

**COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION**

IN THE MATTER OF:  ELECTRONIC 2024 JOINT INTEGRATED RESOURCE PLAN OF LOUISVILLE GAS AND ELECTRIC COMPANY AND KENTUCKY UTILITIES COMPANY	: : : : : : : : : :	CASE NO. 2024-00326
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**SECOND SET OF DATA REQUESTS OF  
KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC.  
TO KENTUCKY UTILITIES COMPANY AND  
LOUISVILLE GAS & ELECTRIC COMPANY**

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**COUNSEL FOR KENTUCKY INDUSTRIAL  
UTILITY CUSTOMERS, INC.**

Dated: January 22, 2025

## DEFINITIONS

1. “Document” means the original and all copies (regardless of origin and whether or not including additional writing thereon or attached thereto) of memoranda, reports, books, manuals, instructions, directives, records, forms, notes, letters, notices, confirmations, telegrams, pamphlets, notations of any sort concerning conversations, telephone calls, meetings or other communications, bulletins, transcripts, diaries, analyses, summaries, correspondence investigations, questionnaires, surveys, worksheets, and all drafts, preliminary versions, alterations, modifications, revisions, changes, amendments and written comments concerning the foregoing, in whatever form, stored or contained in or on whatever medium, including computerized memory or magnetic media.
2. “Study” means any written, recorded, transcribed, taped, filmed, or graphic matter, however produced or reproduced, either formally or informally, a particular issue or situation, in whatever detail, whether or not the consideration of the issue or situation is in a preliminary stage, and whether or not the consideration was discontinued prior to completion.
3. “Person” means any natural person, corporation, professional corporation, partnership, association, joint venture, proprietorship, firm, or the other business enterprise or legal entity.
4. A request to identify a natural person means to state his or her full name and residence address, his or her present last known position and business affiliation at the time in question.
5. A request to identify a document means to state the date or dates, author or originator, subject matter, all addressees and recipients, type of document (e.g., letter, memorandum, telegram, chart, etc.), number of code number thereof or other means of identifying it, and its present location and custodian. If any such document was, but is no longer in the Company’s possession or subject to its control, state what disposition was made of it.
6. A request to identify a person other than a natural person means to state its full name, the address of its principal office, and the type of entity.
7. “And” and “or” should be considered to be both conjunctive and disjunctive, unless specifically stated otherwise.
8. “Each” and “any” should be considered to be both singular and plural, unless specifically stated otherwise.
9. Words in the past tense should be considered to include the present, and words in the present tense include the past, unless specifically stated otherwise.
10. “You” or “your” means the person whose filed testimony is the subject of these interrogatories and, to the extent relevant and necessary to provide full and complete answers to any request, “you” or “your” may be deemed to include any person with information relevant to any interrogatory who is or was employed by or otherwise associated with the witness or who assisted, in any way, in the preparation of the witness’ testimony.
11. “LG&E/KU” or “Company” means Louisville Gas & Electric Company and Kentucky Utilities Company and/or any of their officers, directors, employees or agents who may have knowledge of the particular matter addressed, and affiliates including PPL Corporation.

## INSTRUCTIONS

1. If any matter is evidenced by, referenced to, reflected by, represented by, or recorded in any document, please identify and produce for discovery and inspection each such document.
2. These interrogatories are continuing in nature, and information which the responding party later becomes aware of, or has access to, and which is responsive to any request is to be made available to Kentucky Industrial Utility Customers. Any studies, documents, or other subject matter not yet completed that will be relied upon during the course of this case should be so identified and provided as soon as they are completed. The Respondent is obliged to change, supplement and correct all answers to interrogatories to conform to available information, including such information as it first becomes available to the Respondent after the answers hereto are served.
3. Unless otherwise expressly provided, each interrogatory should be construed independently and not with reference to any other interrogatory herein for purpose of limitation.
4. The answers provided should first restate the question asked and also identify the person(s) supplying the information.
5. Please answer each designated part of each information request separately. If you do not have complete information with respect to any interrogatory, so state and give as much information as you do have with respect to the matter inquired about, and identify each person whom you believe may have additional information with respect thereto.
6. In the case of multiple witnesses, each interrogatory should be considered to apply to each witness who will testify to the information requested. Where copies of testimony, transcripts or depositions are requested, each witness should respond individually to the information request.
7. The interrogatories are to be answered under oath by the witness(es) responsible for the answer.
8. Responses to requests for revenue, expense and rate base data should provide data on the basis of Total Company as well as Intrastate data, unless otherwise requested.

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- Q.2-1. Refer to IRP Table 9-1 and the Companies responses to KIUC 1-3 and KIUC 1-10. Please confirm that the Company’s preferred plan and reported revenue requirements in table 9-1 reflects build case E01 (Low Gas, medium coal to gas ratio fuel input build plan) optimized under an ELG scenario but assessed under a MGMR fuel scenario. If not, please describe the assumptions reflected in Table 9-1.
- Q.2-2. Refer to page 5-25 of the IRP that states, “Table 5-3 contains the least-cost resource plans across all fuel scenarios for these two load and environmental scenarios.” Do the Companies imply that under a E01 (LGMR) and E02 (MGMR) build plans under the “03\_ELG” environmental scenario, there is no difference in the build plans? Please explain.
- Q.2-3. Comparing “CONFIDENTIAL\_20241001\_FinancialModel\_05\_RefCase\_0328.xlsx” and “CONFIDENTIAL\_20241001\_FinancialModel\_03\_ELG\_0328.xlsx”
- a. Confirm that the Reference Case Financial model (05\_RefCase) is intended to reflect plan E01, under MGMR fuel assumptions, and ELG scenarios as found in Financial Model 03\_ELG. If not, please explain which full financial model should match to 05\_Ref Case.
  - b. Did the Companies run the Ref Case/Preferred Plan under the various fuel and environmental scenarios in order to compare its performance under various futures? If so, please provide the results of such analysis. If not, please explain why not.
  - c. Please explain why the “05\_RefCase” model only shows 16 years (2024-2039) whereas the other financial models appear to reflect 26 years (2025-2050).
  - d. Please explain the unit retirement assumptions for BR3 in the 03\_ELG model (2030 for E01 and 2031 for E02) compared to 2035 for the 05\_Ref Case model.
  - e. Are unit retirements determined economically though the capacity expansion plan model or forced into specific years? Please explain.

- Q.2-4. Refer to the file, “CONFIDENTIAL\_20241001\_FinancialModel\_05\_RefCase\_0328.xlsx”
- f. Did the Companies run the reference case (05\_Ref) for the comparable study duration through 2050? If so, please provide the financial model results or identify where they can be found in the Company’s workpapers. If not, please explain why not.
  - g. Why is terminal value so much smaller when comparing the 05\_ref to other cases? Is this a function of the shorter study period? Please explain.

Q.2-5. Refer to provided response to KIUC 1-2 part j and discussion related to service under Tariff RTS:

- h. Confirm that the tariff includes language regarding contract term, “Company, however, may require a longer fixed term of contract and termination notice because of conditions associated with the Customer's requirements for service.”
- i. What term is the company requiring for new (data center) customers taking service under RTS and how was such a term length determined? Please explain.
- j. What termination notice is the Company requiring for new (data center) customers taking service under RTS and how was such a requirement determined? Please explain.

/s/ Michael L. Kurtz

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