

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

In the matter of: :

ELECTRONIC 2024 JOINT INTEGRATED : CASE NO. 2024-00326  
RESOURCE PLAN OF LOUISVILLE GAS :  
AND ELECTRIC COMPANY AND :  
KENTUCKY UTILITIES COMPANY :

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**KENTUCKY COAL ASSOCIATION’S SUPPLEMENTAL REQUEST FOR  
INFORMATION TO KENTUCKY UTILITY COMPANY AND LOUISVILLE GAS &  
ELECTRIC COMPANY**

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The Kentucky Coal Association (KCA), intervenor in this action, respectfully requests the applicant, Kentucky Utilities Company and Louisville Gas and Electric Company (collectively, the “Companies”), to respond to the Supplemental Request of Information in accordance with the Order of Procedure entered herein.

Additional Instructions

A. Each request for information shall be accorded a separate answer on a separate piece of paper, and each subpart thereof shall be accorded a separate answer. Each request or subpart thereof shall be specifically admitted or denied, and information inquiries or subparts thereof should not be combined for the purpose of supplying a common answer.

B. Restate the information inquiry immediately preceding each response.

C. Identify the name, title, and business address of each person(s) providing each response and provide the data on which the response was created.

D. In answering these requests, utilize all information and documents that are available to you, including information in the possession of any of your agents, employees or attorneys, or otherwise subject to your custody or control.

E. If you object to any part of a request, answer all parts of such interrogatories or requests to which you do not object, and as to each part to which you do object, separately set forth the specific basis for the objection.

F. If you claim any form of privilege or other protection from disclosure as a ground for withholding information responsive to a request, please explain your claim with sufficient specificity to permit KCA to make a full determination as to whether your claim is valid.

G. In each instance, the request shall be construed so as to require the most inclusive answer or production.

H. Please attach written material to any answer for which written material is requested and/or available. If such written material is not available, state where it may be obtained. Please label the written material with the number of the request to which it pertains.

#### Definitions

As used in these Requests for Information, the following terms have the meaning as set forth below:

1. "You" or "your" means the Companies or the witness, as the context requires.
2. "List", "describe", "explain", "specify" or "state" shall mean to set forth fully, in detail, and unambiguously each and every fact of which the Companies or their officers, employees, agents or representatives, have knowledge which is relevant to the answer called for by the request.
3. The terms "document" or "documents" as used herein shall have the same meaning and scope as in Rule 34 of the Kentucky Rules of Civil Procedure and shall include, without limitation, any writings and documentary material of any kind whatsoever, both originals and copies (regardless of origin and whether or not including additional writing thereon or

attached thereto), and any and all drafts, preliminary versions, alterations, modifications, revisions, changes and written comments of and concerning such material, including but not limited to: correspondence, letters, memoranda, notes, reports, directions, studies, investigations, questionnaires and surveys, inspections, permits, citizen complaints, papers, files, books, manuals, instructions, records, pamphlets, forms, contracts, contract amendments or supplements, contract offers, tenders, acceptances, counteroffers or negotiating agreements, notices, confirmations, telegrams, communications sent or received, print-outs, diary entries, calendars, tables, compilations, tabulations, charts, graphs, maps, recommendations, ledgers, accounts, worksheets, photographs, tape recordings, movie pictures, videotapes, transcripts, logs, work papers, minutes, summaries, notations and records of any sort (printed, recorded or otherwise) of any oral communication whether sent or received or neither, and other written records or recordings, in whatever form, stored or contained in or on whatever medium including computerized or digital memory or magnetic media that:

- (a) are now or were formerly in your possession, custody or control; or
- (b) are known or believed to be responsive to these requests, regardless of who has or formerly had custody, possession or control.

4. The terms "identify" and "identity" when used with respect to an entity mean to state its full name and the address of its principal place of business.

5. The term to "state the basis" for an allegation, contention, conclusion, position or answer means (a) to identify and specify the sources therefore, and (b) to identify and specify all facts on which you rely or intend to rely in support of the allegation, contention, conclusion, position or answer, and (c) to set forth and explain the nature and application to the relevant facts of all pertinent legal theories upon which you rely for your knowledge, information and/or belief

that there are good grounds to support such allegation, contention, conclusion, position or answer.

6. The terms "and" and "or" have both conjunctive and disjunctive meanings as necessary to bring within the scope of the request any information or documents that might otherwise be construed to be outside their scope; "all" and "any" mean both "each" and "every".

7. The terms "relates to" or "relating to" mean referring to, concerning, responding to, containing, regarding, discussing, describing, reflecting, analyzing, constituting, disclosing, embodying, defining, stating, explaining, summarizing, or in any way pertaining to.

8. The term "including" means "including, but not limited to."

#### **SUPPLEMENTAL REQUEST FOR INFORMATION OF KCA**

2-1. On January 20, 2025 the newly inaugurated president declared a national energy emergency that included a number of pro-fossil fuel actions including fast-tracking permits for new fossil fuel infrastructure, over-turning auto emission standards, rolling back restrictions on oil and gas expansion in Alaska, lifting a pause on approvals to export liquefied natural gas, and suspending offshore wind leasing pending further reviews. In addition, President Trump reportedly signed a series of additional executive orders directing government agencies to review and revised environmental policies put into effect during the Biden administration. Do the Companies plan to evaluate the consequences of such actions recognizing potential limitations in making the desired modifications either prior to the IRP being finalized and including in the IRP the limitations related to these potential changes on the analyses including a commitment to reconsider plans prior to making definitive resource decisions?

2-2. To the best of your knowledge, please summarize how some possible regulatory changes could result in changes in the analytics of the IRP including the elimination of Production Tax Credits, Investment Tax Credits, "repeal" of Clean Air Act Section 111(b) and Section 111(d) changes, elimination of the ban on new LNG export terminals, and repeal of the new CCR, ELG, MATS and the Good Neighbor Rule.

2-3. Please explain how the growth, if any, in Data Centers is expected to affect load growth.

2-4. How do the Companies confirm they are not including Data Centers in their load growth which are also being included by other utilities?

- 2-5. How do the Companies plan to protect customers from stranded investments resulting from Data Centers that do not operate as expected and specifically how this concern is addressed in the IRP?
- 2-6. Will the Companies commit to seek no new approvals for coal plant closures until there is transparency into the expected regulatory changes?
- 2-7. Will the Companies commit to seeking third-party buyers of existing coal plants as part of its resource considerations in a manner that would allow these resources to continue to operate and perhaps provide capacity and energy under PPAs to the Companies?
- 2-8. Please indicate whether PPL Corporation is expected to modify any parts of its net-zero corporate policy as a result of expected regulatory changes.
- a. If not, will PPL Corporation agree to assume any incremental costs associated with complying with its Corporate Policies that are not driven by environmental regulations if the incremental costs are not supported by a lowest cost solution.
- 2-9. Please share all analyses the Companies performed to address how sensitive results are to expected changes in regulations affecting coal-fired power plants.
- 2-10. If no analyses have been performed, will the Companies proceed with such analyses before finalizing the IRP?
- 2-11. The Companies have suggested that coal and gas price forecasts should be linked relying on a decision in a prior case by the Commission that the methodology was acceptable in that one instance. However, Fuel prices can and will vary going forward and, KCA requests that the Companies provide **all** documentation including bespoke analyses that confirm this coal price methodology is appropriate for the IRP and any successor analyses.

*For the 2024 IRP Resource Assessment, the Companies developed five fuel price scenarios using the methodology that was used to develop fuel price scenarios for their 2022 CPCN Resource Assessment, which the Commission found to be credible and reasonable in its Final Order in that proceeding. In these fuel price scenarios, natural gas prices are the primary price setting factor, with coal prices derived from gas prices beginning in 2025 based on different historical coal-to-gas ("CTG") price ratios. Sections 4.1.4 and 5.6 in Volume III (2024 IRP Resource Assessment) summarize the Companies' fuel and emission price scenarios.*

2-12. Please provide or identify the full work sheets associated with the below footnote including the referenced third party-bids and forecasts from independent third-party consultants (both redacted as necessary).

<sup>24</sup> The coal price forecast reflects Illinois Basin coal prices. In the first five years of the forecast, the base market price is a blend of prices based on coal bids received but not under contract and forecasts from independent third-party consultants. Beyond the fifth year, prices are increased at the annual growth rate reflected in the EIA's 2021 AEO High Oil and Gas Supply case for "All Coals, Minemouth" price forecast. The high and low coal price forecasts reflect the historical relationship of changes in natural gas and ILB coal prices.

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- a. The Confidential Modeling Inputs included coal price sheets for each case which provide monthly coal prices for each scenario. Please provide the data on an annual basis in a usable file format and include the assumptions for each of these prices including the following: Coal quality (MMBtu/lb, % Sulfur, % Ash, % Moisture) and coal pricing (\$/Ton FOB Mine, \$/Ton FOB Plant).
  - b. The Confidential Modeling Inputs also provided monthly natural gas prices assumptions. Please provide these monthly prices in an excel format, the source of these prices, and how the low and high price scenarios were developed.
  - c. Please provide for each power plant assumed to be burning natural gas, the delivery pipeline(s), the basic terms including term, volume, fixed and variable costs, etc. of the delivering contracts, and the associated pricing.
- 2-13. Please identify all reliability issues related to supply of natural gas of which the Companies are aware in addition to pressurization.
- 2-14. How are the Companies preparing for unexpected events, such as what occurred in North Carolina in 2024 and Southern California in 2025? Are these preparations reflected in the IRP?
- 2-15. Please confirm that Mill Creek 5 is not permitted to burn oil and the Companies did not consider modifying the permit to allow co-firing. If not the case, please explain.
- 2-16. For each gas-fired plant, please provide the current strategies employed or expected to be employed to improve reliability.
- 2-17. With respect to new CCGT's and CT's, please provide all the strategies considered for improving reliability.
- 2-18. Please provide current cost estimates by category for Mill Creek 5 including pipeline costs and estimated completion dates.

- 2.19. Please provide current cost estimates for BESS and estimated completion date.
- 2.20. Please provide updated cost estimates for other technologies since the IRP analysis was performed. Of particular relevance are changes in the costs of renewables.

Respectfully submitted,

/s/Matt Malone

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**KENTUCKY COAL ASSOCIATION**

### **CERTIFICATE OF SERVICE**

I hereby certify that KCA's January 22, 2025 electronic filing is a true and accurate copy of KCA's pleading and Read 1<sup>st</sup> Document to be filed in paper medium; that the electronic filing has been transmitted to the Commission on January 22, 2025; that an original and one copy of the filing will not be delivered to the Commission based on pandemic orders; that there are currently no parties excused from participation by electronic service; and that, on January 22, 2025 electronic mail notification of the electronic filing is provided to all parties of record:

/s/Matt Malone

ATTORNEY FOR KCA