

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

**ELECTRONIC 2024 JOINT )**  
**INTEGRATED RESOURCE PLAN )**  
**OF LOUISVILLE GAS AND ELECTRIC ) Case No. 2024-00326**  
**COMPANY AND KENTUCKY )**  
**UTILITIES COMPANY )**

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**SUPPLEMENTAL DATA REQUESTS OF THE ATTORNEY GENERAL**

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Comes now the Attorney General of the Commonwealth of Kentucky, by his Office of Rate Intervention (“Attorney General”), and submits these Data Requests to Louisville Gas and Electric Company and Kentucky Utilities Company (hereinafter “LG&E/KU” or “Companies”) to be answered by February 11, 2025, in accord with the following:

- (1) In each case where a request seeks data provided in response to a staff request, reference to the appropriate requested item will be deemed a satisfactory response.
- (2) Identify the witness who will be prepared to answer questions concerning each request.
- (3) Repeat the question to which each response is intended to refer.
- (4) These requests shall be deemed continuing so as to require further and supplemental responses if the companies receive or generate additional information within the scope of these requests between the time of the response and the time of any hearing conducted hereon.

(5) Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association, be accompanied by a signed certification of the preparer or person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

(6) If you believe any request appears confusing, please request clarification directly from undersigned Counsel.

(7) To the extent that the specific document, workpaper or information as requested does not exist, but a similar document, workpaper or information does exist, provide the similar document, workpaper, or information.

(8) To the extent that any request may be answered by way of a computer printout, please identify each variable contained in the printout which would not be self-evident to a person not familiar with the printout.

(9) If the company has objections to any request on the grounds that the requested information is proprietary in nature, or for any other reason, notify undersigned Counsel as soon as possible, and in accordance with Commission direction.

(10) As used herein, the words "document" or "documents" are to be construed broadly and shall mean the original of the same (and all non-identical copies or drafts thereof) and if the original is not available, the best copy available. These terms shall include all information recorded in any written, graphic or other tangible form and shall include, without limiting the generality of the foregoing, all reports; memoranda; books or notebooks; written or recorded statements,

interviews, affidavits and depositions; all letters or correspondence; telegrams, cables and telex messages; contracts, leases, insurance policies or other agreements; warnings and caution/hazard notices or labels; mechanical and electronic recordings and all information so stored, or transcripts of such recordings; calendars, appointment books, schedules, agendas and diary entries; notes or memoranda of conversations (telephonic or otherwise), meetings or conferences; legal pleadings and transcripts of legal proceedings; maps, models, charts, diagrams, graphs and other demonstrative materials; financial statements, annual reports, balance sheets and other accounting records; quotations or offers; bulletins, newsletters, pamphlets, brochures and all other similar publications; summaries or compilations of data; deeds, titles, or other instruments of ownership; blueprints and specifications; manuals, guidelines, regulations, procedures, policies and instructional materials of any type; photographs or pictures, film, microfilm and microfiche; videotapes; articles; announcements and notices of any type; surveys, studies, evaluations, tests and all research and development (R&D) materials; newspaper clippings and press releases; time cards, employee schedules or rosters, and other payroll records; cancelled checks, invoices, bills and receipts; and writings of any kind and all other tangible things upon which any handwriting, typing, printing, drawings, representations, graphic matter, magnetic or electrical impulses, or other forms of communication are recorded or produced, including audio and video recordings, computer stored information (whether or not in printout form), computer-readable media or other

electronically maintained or transmitted information regardless of the media or format in which they are stored, and all other rough drafts, revised drafts (including all handwritten notes or other marks on the same) and copies of documents as hereinbefore defined by whatever means made.

(11) For any document withheld on the basis of privilege, state the following: date; author; addressee; indicated or blind copies; all persons to whom distributed, shown, or explained; and, the nature and legal basis for the privilege asserted.

(12) In the event any document called for has been destroyed or transferred beyond the control of the company, please state: the identity of the person by whom it was destroyed or transferred, and the person authorizing the destruction or transfer; the time, place, and method of destruction or transfer; and, the reason(s) for its destruction or transfer. If destroyed or disposed of by operation of a retention policy, state the retention policy.

(13) Provide written responses, together with any and all exhibits pertaining thereto, in one or more bound volumes, separately indexed and tabbed by each response, in compliance with Kentucky Public Service Commission Regulations.

(14) "And" and "or" should be considered to be both conjunctive and disjunctive, unless specifically stated otherwise.

(15) "Each" and "any" should be considered to be both singular and plural, unless specifically stated otherwise.

Respectfully submitted,

RUSSELL COLEMAN  
ATTORNEY GENERAL



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*Certificate of Service and Filing*

Pursuant to the Commission's Orders and in accord with all other applicable law, Counsel certifies that, on January 22, 2025, an electronic copy of the foregoing was served via the Commission's electronic filing system.

this 22nd day of January, 2025

A handwritten signature in blue ink, appearing to read "J. Michael New". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

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Assistant Attorney General

**ELECTRONIC 2024 JOINT INTEGRATED RESOURCE PLAN OF LOUISVILLE  
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No. 2024-00326**

**Supplemental Data Requests**

1. See [https://www.wdrb.com/in-depth/developers-unveil-plans-for-large-tech-data-center-in-louisville-the-1st-of-its-kind/article\\_e7adef68-c92f-11ef-b262-bf1780db36c6.html](https://www.wdrb.com/in-depth/developers-unveil-plans-for-large-tech-data-center-in-louisville-the-1st-of-its-kind/article_e7adef68-c92f-11ef-b262-bf1780db36c6.html) for an article entitled, *Developers unveil plans for large tech data center in Louisville, the 1st of its kind in Kentucky*.
  - a. Provide detailed information regarding the generation, transmission, and distribution needs for the project described therein including information related to cost and timelines.
  - b. Will the needs specified in response to Section (a), require any reconsideration of the plans specified in the IRP or is this additional load tolerated by the capacity of the system planned for in the filed IRP?
  
2. See Response to AG Data Request 1-8 where it states “LG&E’s and KU’s actions contribute to and help inform PPL’s emission goals.” See also Response to AG Data Request 1-9 where links are provided to PPL’s “Climate Action” website. Confirm that PPL has a self-described “ambitious goal to achieve net-zero carbon emissions by 2050,” and targets a 70% emissions reduction by 2035.
  - a. Discuss how LG&E/KU can simultaneously pursue the specified goals while at the same time complying with the policy of the Commonwealth of Kentucky as specified in KRS 164.1807 which states in part, “[t]he energy needs of the Commonwealth are best met by continuing to engage in an all-of-the-above approach to electric generation resources, including but not limited to coal, oil, natural gas, wind, solar, hydropower, nuclear, and any future or emerging technologies like hydrogen power.”
  - b. Inasmuch as, pursuant to KRS 164.1807(k), it is the policy of the Commonwealth that, “[f]urther retirement of fossil fuel-fired electric generating resources is not necessary for the protection of the environment or the health, safety, and welfare of the citizens of the Commonwealth,” confirm that PPL’s goal, which LG&E/KU is directly contrary to the law and policy of the Commonwealth.
  - c. The Companies gave substantial treatment to environmental regulation in its IRP. See Volume I at 6-7 through 6-11. Please specify where in the IRP the Companies gave consideration to Kentucky laws relating to energy and the environment.
  - d. If LG&E/KU failed to consider Kentucky policy and law in the IRP process, explain why they failed to do so.

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- e. If LG&E/KU considered Kentucky policy and law in the IRP process but failed to discuss that consideration in the filing, discuss why it failed to do so.
3. See Response to AG Data Request 1-12.
- a. Discuss why LG&E/KU fail to specifically prefer in-state generation when the General Assembly has stated the Commonwealth's policy that, "[i]t is in the interest of the Commonwealth that it be able to generate sufficient electricity within its borders to serve its own industrial, residential, and commercial demand and to power its own economy." See KRS 164.1807(f).
  - b. Discuss whether it is appropriate for a public utility that has been granted a service territory by the Commonwealth to disregard the energy and environmental policies of the same Commonwealth that granted that monopoly.