

**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)

INITIAL DATA REQUESTS OF THE ATTORNEY GENERAL

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 December 18, 2024, 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



J. MICHAEL WEST
LAWRENCE W. COOK
ANGELA M. GOAD
JOHN G. HORNE II
ASSISTANT ATTORNEYS GENERAL
1024 CAPITAL CENTER DRIVE, SUITE 200
FRANKFORT, KY 40601-8204
PHONE: (502) 696-5433
FAX: (502) 564-2698
Michael.West@ky.gov
Larry.Cook@ky.gov
Angela.Goad@ky.gov
John.Horne@ky.gov

Certificate of Service and Filing

Pursuant to the Commission's Orders and in accord with all other applicable law, Counsel certifies that, on November 21, 2024, an electronic copy of the foregoing was served via the Commission's electronic filing system.

this 21st day of November, 2024

A handwritten signature in blue ink, appearing to read "J. Michael New". The signature is written in a cursive style with a horizontal line extending from the end.

Assistant Attorney General

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

Data Requests

1. Provide a copy of all confidential filings/workpapers filed with the Commission in this docket.
2. Confirm that the IRP is essentially a snap-shot in time, and does not represent firm resource commitments.
3. Provide the estimated capital and operations and maintenance costs for the “Recommended Resource Plan” which begins on page 5-25 of Volume I of the IRP.
4. Provide an analysis of the rate impacts for the residential customer of average usage for implementation of the Recommended Resource Plan.
5. Discuss whether data center proliferation as shown in the Companies load forecast increases, decreases, or leaves unchanged residential rates.
 - a. Discuss the steps the Companies have taken or will take to mitigate negative rates impacts on residential customers (if any are forecasted) based on data center proliferation.
6. Discuss whether the capital costs at Table 6-4 have changed since the filing of the IRP.
 - a. Discuss why the costs associated with different resources should not be compared against each other including but not limited to, the effect of intermittency of renewable resources, the technical limitations of battery resources (i.e. batteries are not generation resources), etc.
 - b. Confirm that intermittency poses problems for comparing resources based on a levelized cost of energy.
7. See IRP Volume I at 5-26. “To develop the Recommended Resource Plan, the Companies started with the resource plan that is least-cost in the Mid load, Ozone NAAQS + ELG scenario and modified it to (1) support the potential for high economic development load growth and CO2 regulations and (2) have no regrets should high load or CO2 regulations not come to fruition.” See also *Trump taps former Rep. Lee Zeldin to lead EPA*, <https://www.utilitydive.com/news/trump-zeldin-epa-power-plant-carbon-ash-remand-stay/732616/> wherein it is speculated that EPA could revisit carbon, ozone transport, effluent limits and MATS rules, among others.
 - a. Discuss the impact of the recent election results and the associated potential for dramatic changes to the regulatory landscape associated NAAQS and ELG on the Companies’ assumptions related to scenario planning.
8. Please provide copies of any LG&E or KU policy or policy statements regarding carbon free or net-zero emission goals.
9. Please provide copies of any PPL policy or policy statements regarding carbon free or net-zero emission goals.
10. Confirm that LG&E/KU do not rely on solar or wind-generated electricity exclusively to provide power to any single customer twenty-four hours per day, seven days per week, three hundred sixty-five days per year. If unable to confirm,

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please identify customers so served by name and location, and provide the location of the generating facility.

11. Discuss whether the Companies have filed legal challenges to any of the following rules. If so, please provide a copy of the petition(s) challenging the applicable rule. If not, please explain why not:
 - a. a. EPA’s Greenhouse Gas (GHG) Emission rule for fossil fuel power plants, published in the Federal Register May 9, 2024;
 - b. b. EPA’s Coal Combustion Residual (CCR) rule for fossil fuel power plants, published in the Federal Register May 8, 2024;
 - c. c. EPA’s Effluent Limit Guidelines (ELG) rule for fossil fuel power plants that was published in the Federal Register May 9, 2024;
 - d. d. EPA’s Mercury and Air Toxic Standards (MATS) rule for fossil fuel power plants that was published in the Federal Register May 7, 2024.
12. Discuss whether the Companies have a preference for building new generation within Kentucky, outside of Kentucky or no preference either way. Please provide copies of any LG&E or KU policy or policy statements regarding the location of new generation.
13. Discuss whether the Companies have a preference for securing needed capacity on the open market or for building generation capacity.
14. Discuss whether the Companies have a preference for dispatchable generation or intermittent generation.