

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

**In the Matter of:**

<b>ELECTRONIC 2024 JOINT INTEGRATED</b>	)	
<b>RESOURCE PLAN OF LOUISVILLE GAS AND</b>	)	<b>CASE NO. 2024-00326</b>
<b>ELECTRIC COMPANY AND KENTUCKY</b>	)	
<b>UTILITIES COMPANY</b>	)	

**FEBRUARY 14, 2025 SUPPLEMENTAL AND CORRECTED RESPONSE OF  
LOUISVILLE GAS AND ELECTRIC COMPANY  
AND  
KENTUCKY UTILITIES COMPANY  
TO  
JOINT INTERVENORS METROPOLITAN HOUSING COALITION,  
KENTUCKIANS FOR THE COMMONWEALTH, KENTUCKY SOLAR  
ENERGY SOCIETY AND MOUNTAIN ASSOCIATION'S, INITIAL  
REQUEST FOR INFORMATION  
DATED NOVEMBER 22, 2024**

**FILED: FEBRUARY 14, 2025**

VERIFICATION

COMMONWEALTH OF KENTUCKY )  
 )  
COUNTY OF JEFFERSON )

The undersigned, **Elizabeth J. McFarland**, being duly sworn, deposes and says that she is Vice President, Transmission for Kentucky Utilities Company and Louisville Gas and Electric Company and an employee of LG&E and KU Services Company, and that she has personal knowledge of the matters set forth in the responses for which she is identified as the witness, and the answers contained therein are true and correct to the best of her information, knowledge, and belief.

*Elizabeth J. McFarland 2/7/25*

**Elizabeth J. McFarland**

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 7<sup>th</sup> day of February 2025.

*Caroline J. Davison*  
Notary Public

Notary Public ID No. KYNP 63286

My Commission Expires:

January 22, 2027



VERIFICATION

COMMONWEALTH OF KENTUCKY )  
 )  
COUNTY OF JEFFERSON )

The undersigned, **Shannon L. Montgomery**, being duly sworn, deposes and says she is the Vice President, Customer Services for Kentucky Utilities Company and Louisville Gas and Electric Company and an employee of LG&E and KU Services Company, and that she has personal knowledge of the matters set forth in the responses for which she is identified as the witness, and the answers contained therein are true and correct to the best of her information, knowledge, and belief.

*Shannon Montgomery*  
\_\_\_\_\_  
Shannon L. Montgomery

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 4th day of February 2025.

*Caroline J. Davison*  
\_\_\_\_\_  
Notary Public  
Notary Public ID No. KYNP63286

My Commission Expires:

January 22, 2027



**LOUISVILLE GAS AND ELECTRIC COMPANY**  
**AND**  
**KENTUCKY UTILITIES COMPANY**

**February 14, 2025 Supplemental Response to Joint Intervenors Metropolitan Housing Coalition, Kentuckians for the Commonwealth, Kentucky Solar Energy Society and Mountain Association's Initial Request for Information**  
**Dated November 22, 2024**

**Case No. 2024-00326**

**Question No. 1.49**

**Responding Witness: John Bevington / Tim A. Jones / Elizabeth J. McFarland / Michael S. Sebourn**

- Q-1.49. Please refer to page 7-12 through 7-13 in Section 7 of IRP Volume I, in which the Companies describe the benefits of data centers: "Given the nature of their operations, data centers have extremely high load factors – upwards of 95%. Energy intensive data centers are crucial to consumers, businesses, and the safety and security of our nation. They support critical business applications, store valuable business and personal data, keep data safe from threats, and serve as a foundation for modern business and government applications."
- a. Please describe how these benefits associated with data centers are relevant to ratepayers.
  - b. What transmission planning and/or analyses have the Companies conducted in relation to anticipated load growth from data centers? Please provide supporting documentation, background materials, and analysis (in machine-readable Excel format with formulae intact).
  - c. What reliability planning and/or analyses have the Companies conducted in relation to anticipated load growth from data centers? Please provide supporting documentation, background materials, and analysis (in machine-readable Excel format with formulae intact).
  - d. What requirements for curtailable potential are assumed in the Companies modeling in relation to anticipated load growth from data centers? Please provide supporting documentation, background materials, and analysis (in machine-readable Excel format with formulae intact).
  - e. What requirements for data centers investment in on-site battery energy storage systems (BESS) are assumed in the Companies' modeling in relation to anticipated load growth from data centers? Please provide supporting

documentation, background materials, and analysis (in machine-readable Excel format with formulae intact).

**A-1.49. Original Response:**

- b. The Companies have not conducted transmission planning or analyses concerning the generic load growth from data centers modeled in the IRP. (See the response to PSC 1-21.) Transmission planning and related costs for such large potential customers is highly location-specific. For transmission planning and analyses conducted by the Companies for specific potential data center loads, see attachment being provided in a separate file. Note that the files are being provided in their native format, not necessarily in Excel because exporting to Excel either is not possible or would result in inoperable or incomprehensible files. The information requested is confidential and proprietary and is being provided under seal pursuant to a petition for confidential protection. See the response to Question No. 1.61 for the procedures for interconnecting a new customer.

**February 14, 2025 Supplemental Response:**

- b. The Companies have identified additional analysis related to anticipated load growth from data centers. See attachments being provided in separate files. The information requested is confidential and proprietary and is being provided under seal pursuant to a petition for confidential protection.

**LOUISVILLE GAS AND ELECTRIC COMPANY  
AND  
KENTUCKY UTILITIES COMPANY**

**February 14, 2025 Corrected Response to Joint Intervenors Metropolitan Housing Coalition, Kentuckians for the Commonwealth, Kentucky Solar Energy Society and Mountain Association’s Initial Request for Information  
Dated November 22, 2024**

**Case No. 2024-00326**

**Question No. 1.55**

**Responding Witness: Shannon L. Montgomery / Stuart A. Wilson**

Q-1.55. Please provide the following data over the most recent three-year period available, and related internal analysis considered as part of the 2024 IRP:

- a. Monthly number of customers that received a disconnection notice by zip code;
- b. Monthly number of disconnections for nonpayment by zip code;
- c. Monthly average number of customers with a past due balance;
- d. Monthly average past due balance amount;
- e. Monthly average number of participants in a payment assistance program

A-1.55. **Original Response:**

c. and d. See the table below.

	<u>2021</u>	<u>2022</u>	<u>2023</u>
c. Monthly average number of customers with a past due balance	99,335	103,142	103,199
d. Monthly average past due balance amount	\$ 199.46	\$ 202.72	\$ 188.12

**February 14, 2025 Corrected Response:**

Following the submission of this initial request for information, the Companies identified that the averaging function in SQL did not perform as expected to return the average number of customer with a past due balance or the monthly average past due balance amounts. The corrections are provided in the table below.

	<u>2021</u>	<u>2022</u>	<u>2023</u>
c. Monthly average number of customers with a past due balance	109,160	130,102	149,243
d. Monthly average past due balance amount	\$ 221.52	\$ 219.64	\$ 194.27