

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

RESPONSE OF
LOUISVILLE GAS AND ELECTRIC COMPANY
AND
KENTUCKY UTILITIES COMPANY
TO
THE COMMISSION STAFF'S POST HEARING REQUEST FOR
INFORMATION
DATED MAY 19, 2025

FILED: JUNE 6, 2025

VERIFICATION

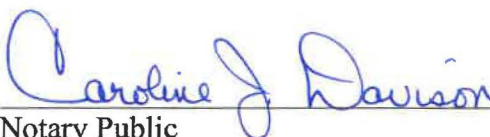
COMMONWEALTH OF KENTUCKY)
)
COUNTY OF JEFFERSON)

The undersigned, **John Bevington**, being duly sworn, deposes and says that he is Senior Director – Business and Economic Development for PPL Services Corporation and he provides services to LG&E and KU Services Company, that he has personal knowledge of the matters set forth in the responses for which he is identified as the witness, and the answers contained therein are true and correct to the best of his information, knowledge, and belief.



John Bevington

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 2nd day of June 2025.



Notary Public

Notary Public ID No. KYNP63286

My Commission Expires:

January 22, 2027



VERIFICATION

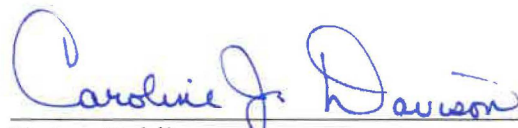
COMMONWEALTH OF KENTUCKY)
)
COUNTY OF JEFFERSON)

The undersigned, **Michael S. Sebourn**, being duly sworn, deposes and says that he is Director – Energy Planning, Analysis and Forecasting for LG&E and KU Services Company, that he has personal knowledge of the matters set forth in the responses for which he is identified as the witness, and the answers contained therein are true and correct to the best of his information, knowledge, and belief.



Michael S. Sebourn

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 29th day of May 2025.



Notary Public

Notary Public ID No. KYNP63286

My Commission Expires:

January 22, 2027



VERIFICATION

COMMONWEALTH OF KENTUCKY)
)
COUNTY OF JEFFERSON)

The undersigned, **David L. Tummonds**, being duly sworn, deposes and says that he is Senior Director - Project Engineering for Kentucky Utilities Company and Louisville Gas and Electric Company and is an employee of LG&E and KU Services Company, that he has personal knowledge of the matters set forth in the responses for which he is identified as the witness, and the answers contained therein are true and correct to the best of his information, knowledge, and belief.


David L. Tummonds

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


Notary Public

Notary Public, ID No. KYNP 4577

My Commission Expires:

April 1, 2028



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

**Response to Commission Staff's Post Hearing Request for Information
Dated May 19, 2025**

Case No. 2024-00326

Question No. 1

Responding Witness: John Bevington

- Q-1. Refer to Commission Staff's First Request for Information, Item 21. Provide a map showing the potential data center (DC) locations and include the number of MW associated with each location.
- A-1. See attachment being provided in a separate file, which shows the location and MW of the data centers in the economic development queue as of June 4, 2025.

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

**Response to Commission Staff's Post Hearing Request for Information
Dated May 19, 2025**

Case No. 2024-00326

Question No. 2

Responding Witness: Michael S. Sebourn

- Q-2. Refer to the hearing testimony of Mr. Michael Seabourn on May 14, 2025. Provide the presentation(s) regarding PLEXOS and PROSYM prepared to compare actual information to the forecasted information as well as all workpapers used to compile the information in the presentations for the years 2022, 2023, and 2024.
- A-2. The Companies review PROSYM results, including comparisons of prospective forecasts to historical data, as part of their annual business planning process. These comparisons demonstrate the reasonableness of the Companies' forecasts. The Companies do not compare actual metrics to PROSYM forecasts for concurrent years because the variances between assumed and actual inputs make such a comparison less useful. The Companies have not included PLEXOS in these comparisons because they do not use it to prepare their business plans. Relevant slides from the Companies' annual business plan presentations and the supporting workpapers are attached. See the attachment being provided in a separate file. Certain information 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**

**Response to Commission Staff's Post Hearing Request for Information
Dated May 19, 2025**

Case No. 2024-00326

Question No. 3

Responding Witness: David L. Tummonds

- Q-3. Refer to IRP Volume I, Table 8-4 at 8-14 and 6-6, FN 38, in which LG&E/KU reference Mercer and Marion County solar projects moving forward. Also refer to Joint Application in Case No. 2022-00402 CPCN in which LG&E/KU, on page 3, state: "the Mercer County Solar Facility is to be built and on-line in 2026," "the Brown BESS is to be built and on-line in 2026," and "the Marion County Solar Facility is to be built by BrightNight, LLC and purchased and on-line in 2027." The Companies' 2024-00326 IRP pointed to these renewables projects as moving forward despite the status of the solar PPAs. Provide an update to those projects including whether construction has begun, the current progress of construction, applicable, and whether the facilities will still be online in 2027.
- A-3. The Companies started construction of the Mercer County solar project in late April as noted in the communication on March 25, 2025.¹ As noted in that communication, the Companies communicated emergency response information specific to this initial construction activity to local officials and notified residents and businesses within 2000' of the initial construction plan. Both communications noted that updates would be provided in advance of the Engineering, Procurement, and Construction ("EPC") activities on site. As previously noted, the Companies expect to execute that EPC agreement in June 2025 and expect the facility to be online in 2027.

Construction has not commenced on the Marion County solar project. The Companies expect the Marion facility to be online in 2027.

¹ *Electronic Joint Application of Kentucky Utilities Company and Louisville Gas and Electric Company for Certificates of Public Convenience and Necessity and Site Compatibility Certificates and Approval of a Demand Side Management Plan and Approval of Fossil Fuel-Fired Generation Unit Retirements*, Case No. 2022-00402, LG&E/KU Update (Ky. PSC Mar. 25, 2025); *Electric Application of Kentucky Utilities Company and Louisville Gas and Electric Company for a Site Compatibility Certificate for the Construction of a Solar Facility in Mercer County, Kentucky*, Case No. 2023-00361, LG&E/KU Update (Ky PSC Mar. 25, 2025)