

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

In the Matter of:

ELECTRONIC APPLICATION OF KENTUCKY)	
UTILITIES COMPANY AND LOUISVILLE GAS)	
AND ELECTRIC COMPANY FOR CERTIFICATES)	CASE NO. 2025-00045
OF PUBLIC CONVENIENCE AND NECESSITY)	
AND SITE COMPATIBILITY CERTIFICATES)	

**POST HEARING REQUESTS FOR INFORMATION OF KENTUCKIANS
FOR THE COMMONWEALTH, KENTUCKY SOLAR ENERGY SOCIETY,
METROPOLITAN HOUSING COALITION, AND MOUNTAIN
ASSOCIATION TO LOUISVILLE GAS & ELECTRIC COMPANY AND
KENTUCKY UTILITIES COMPANY**

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Kentuckians for the Commonwealth,
Kentucky Solar Energy Society,
Metropolitan Housing Coalition, and
Mountain Association*

Dated: Aug. 13, 2025

DEFINITIONS

1. "Document" means the original and all copies (regardless of origin and whether or not including additional writing thereon or attached thereto) of any memoranda, reports, books, manuals, instructions, directives, records, forms, notes, letters, or notices, in whatever form, stored or contained in or on whatever medium, including digital media.
2. "Study" means any written, recorded, transcribed, taped, filmed, or graphic matter, however produced or reproduced, either formally or informally, a particular issue or situation, in whatever detail, whether or not the consideration of the issue or situation is in a preliminary stage, and whether or not the consideration was discontinued prior to completion.
3. "Person" means any natural person, corporation, professional corporation, partnership, association, joint venture, proprietorship, firm, or the other business enterprise or legal entity.
4. A request to identify a natural person means to state his or her full name and business address, and last known position and business affiliation at the time in question.
5. A request to identify a document means to state the date or dates, author or originator, subject matter, all addressees and recipients, type of document (e.g., letter, memorandum, telegram, chart, etc.), identifying number, and its present location and custodian. If any such document was but is no longer in the Company's possession or subject to its control, state what disposition was made of it and why it was so disposed.
6. A request to identify a person other than a natural person means to state its full name, the address of its principal office, and the type of entity.
7. "And" and "or" should be considered to be both conjunctive and disjunctive, unless specifically stated otherwise.
8. "Each" and "any" should be considered to be both singular and plural, unless specifically stated otherwise.
9. Words in the past tense should be considered to include the present, and words in the present tense include the past, unless specifically stated otherwise.

10. “You” or “your” means the person whose filed testimony is the subject of these data requests and, to the extent relevant and necessary to provide full and complete answers to any request, “you” or “your” may be deemed to include any other person with information relevant to any interrogatory who is or was employed by or otherwise associated with the witness or who assisted, in any way, in the preparation of the witness’ testimony.
11. “Companies”, “Louisville Gas & Electric Company and Kentucky Utilities Company”, or “LG&E-KU ”, means Louisville Gas & Electric Company and Kentucky Utilities Company, their parents or subsidiaries, and/or any of its officers, directors, employees or agents who may have knowledge of the particular matter addressed, and affiliated companies including member cooperatives.
12. “Joint Intervenors” means Kentuckians for the Commonwealth, Kentucky Solar Energy Society, Metropolitan Housing Coalition, and Mountain Association who have been granted the status of full intervention as joint intervenors in this matter.
13. Unless otherwise specified in each individual request the term “tariff” means the tariff as filed in this matter by LG&E-KU .
14. “Commission” or “PSC” means the Kentucky Public Service Commission, including its Commissioners, personnel, and offices.
15. “DSM” means Demand Side Management.
16. “EE” means Energy Efficiency.
17. “HVT” means Hearing Video Transcript.
18. “ITO” means Independent Transmission Organization.
19. “NGCC” means Natural Gas Combined Cycle.
20. “TSR” means Transmission Service Request.

INSTRUCTIONS

1. If any matter is evidenced by, referenced to, reflected by, represented by, or recorded in any document, please identify and produce for discovery and inspection each such document.
2. These requests for information are continuing in nature, and information which the responding party later becomes aware of, or has access to, and which is responsive to any request is to be made available to Joint Intervenors. Any studies, documents, or other subject matter not yet completed that will be relied upon during the course of this case should be so identified and provided as soon as they are completed. The Respondent is obliged to change, supplement and correct all answers to interrogatories to conform to available information, including such information as it first becomes available to the Respondent after the answers hereto are served.
3. Unless otherwise expressly provided, each data request should be construed independently and not with reference to any other interrogatory herein for purpose of limitation.
4. The answers provided should first restate the question asked and also identify the person(s) supplying the information.
5. Please answer each designated part of each information request separately. If you do not have complete information with respect to any interrogatory, so state and give as much information as you do have with respect to the matter inquired about and identify each person whom you believe may have additional information with respect thereto.
6. In the case of multiple witnesses, each interrogatory should be considered to apply to each witness who will testify to the information requested. Where copies of testimony, transcripts, or depositions are requested, each witness should respond individually to the information request.
7. Wherever the response to a request consists of a statement that the requested information is already available to Joint Intervenors, please provide a detailed citation to the document that contains the information. This citation shall include the title of the document, relevant page number(s), and, to the extent possible, paragraph number(s) and/or chart/table/figure number(s).

8. If you claim a privilege including, but not limited to, the attorney-client privilege or the work product doctrine, as grounds for not fully and completely responding to any discovery request, please describe the basis for your claim of privilege in sufficient detail so as to permit Joint Intervenor or the Commission to evaluate the validity of the claim. With respect to documents for which a privilege is claimed, please produce a "privilege log" that identifies the author, recipient, date, and subject matter of the documents or interrogatory answers for which you are asserting a claim of privilege and any other information pertinent to the claim that would enable Joint Intervenor or the Commission to evaluate the validity of such claims.
9. Whenever the documents responsive to a discovery request consist of modeling files (including inputs or output) and/or workpapers, the files and workpapers should be provided in machine-readable electronic format (e.g., Microsoft Excel), with all formulas and cell references intact.
10. The interrogatories are to be answered under oath by the witness(es) responsible for the answer.

POST HEARING DATA REQUESTS PROPOUNDED TO
LOUISVILLE GAS & ELECTRIC COMPANY AND
KENTUCKY UTILITIES COMPANY BY JOINT
INTERVENORS

Joint Intervenors hereby tender the following post-hearing requests for information to the Companies:

- 4.1. Please refer to the August 6, 2025 Hearing Video Transcript (“HVT”) at approximately 10:51-10:53 and produce the most recent version of the Companies’ list of economic development loads, including inactive projects (e.g. “lost” opportunities or other projects not brought to fruition as referenced by Mr. Bevington, as well as any completed or contracted projects). To the extent available, include the following information:
 - a. Stage in the economic development pipeline;
 - b. Expected size (in kW or MW);
 - c. Location;
 - d. Name;
 - e. Type of project;
 - f. Whether the developer has submitted Transmission Service Request (“TSR”), and the stage of the TSR;
 - g. Whether the developer has signed an Engineering Letter of Authorization;
 - h. Whether the developer or another entity has signed a Contract(s) for Electric Service for the project.
- 4.2. Please refer to the August 6, 2025 HVT at approximately 4:32 PM and produce the Transitional Cluster Study that was completed on July 18, 2025, along with all supporting workpapers, inputs, outputs, and assumptions.
- 4.3. Please refer to the August 6, 2025 HVT at approximately 4:15 PM to 4:19 PM and answer the following requests.
 - a. Please produce the Confidentiality Agreement that the Companies have entered into regarding the Borealis Project.
 - b. Please refer to Sierra Club request 1.38(a) and produce all communications that the Companies have had with Texas Gas Transmission, Texas Eastern, and/or Tennessee Gas regarding firm transportation service for Brown 12 and Mill Creek 6 that have not already been produced, including all

communications with Texas Gas Transmission that have occurred since the Companies entered into a Confidentiality Agreement regarding the Borealis Project.

- c. Please identify in the record the Companies' assumed gas transportation cost for Mill Creek 6.
- 4.4. Please refer to Attachment 1 produced in response to Sierra Club request 1.38(a) and answer the following requests.
- a. Please produce the draft termsheet referenced on Page 1 of Attachment 1 and explain to what extent that termsheet has been incorporated into the Companies' assumed gas transportation cost for Brown 12.
 - b. If the Companies completed the Service Request Form identified in Pages 7-8 of Attachment 1, please produce the completed Service Request Form.
 - c. If the Companies completed the Confidentiality Agreement identified in Pages 9-14 of Attachment 1, please produce the completed Confidentiality Agreement.
 - d. Please explain the status of any bidding from the Companies pertaining to the Mississippi Crossing Project.
 - e. To the extent that any communications pertaining to the Mississippi Cross Project exist that have not otherwise been produced, please produce those communications.
 - f. Please identify in the record the Companies' assumed gas transportation cost for Brown 12.
- 4.5. Please refer to the August 7, 2025 HVT at approximately 9:14-9:18 AM and provide the following:
- a. The Independent Transmission Organization ("ITO") analysis of system and network upgrades referenced in response to Joint Intervenor's request 1.25(a). If no such analysis is yet complete, provide the anticipated date of completion.
 - b. Any analysis completed by either the Companies or the ITO analyzing electric transmission needs to keep Mill Creek 2 in-service beyond 2027.
 - c. Any analysis completed by either the Companies or the ITO analyzing additional electric transmission costs that would result from extending the life of Mill Creek 2 beyond 2027.
- 4.6. Please refer to the August 7, 2025 HVT at approximately 9:24-9:26 AM and provide the following:

- a. Please explain what transmission upgrades would be necessary to keep Mill Creek 2 in-service past 2027 (assuming Mill Creek 5 is online and Mill Creek 3 & 4 remain online), including an estimate of costs for such upgrades.
 - b. Please explain what transmission upgrades would be necessary to keep Mill Creek 2 in-service past 2031 (assuming both Mill Creek 5 and Mill Creek 6 are online and Mill Creek 3 & 4 remain online), including an estimate of costs for such upgrades.
- 4.7. Please refer to the August 7, 2025 HVT at approximately 9:26 AM and provide the following:
 - a. The current amount (MW) of interconnection rights at the Mill Creek site.
 - b. Please explain whether the Companies have sufficient interconnection rights to accommodate Mill Creek 5 in a scenario where Mill Creek 2 remains in-service beyond 2027 and Mill Creek 3 & 4 remain online.
 - c. Please explain whether the Companies have sufficient interconnection rights to accommodate Mill Creek 6 in a scenario where Mill Creek 2 remains in-service beyond 2031 and Mill Creek 3 & 4 remain online.
- 4.8. Please refer to the August 7, 2025 HVT at approximately 9:28-9:30 AM and provide the Companies' best estimate of total electric transmission costs for each NGCC facility, including both transformer costs and network upgrade costs.
- 4.9. Please refer to the August 7, 2025 HVT at approximately 11:11-11:13 AM and list DSM Advisory Group participants (e.g., the Office of the Attorney General, Kentuckians for the Commonwealth, Wal-Mart).
Note: This request does not seek identification of particular individuals that participated in meetings.
- 4.10. Please refer to the August 7, 2025 HVT at approximately 11:18-11:26 AM, and answer the following requests.
 - a. Identify and produce electronic messages related to the Friday, August 2, 2024, and Wednesday, August 7, 2024 emails from Sarah Pierce, Metropolitan Housing Coalition, to John Hayden, LG&E/KU Energy, LLC, displayed at hearing and attached hereto as an Attachment. A related message includes but is not limited to responses directly to Ms. Pierce. For example, any forwarding of the identified messages and subsequent messages among the Companies' DSM Team or other employees discussing Ms. Pierce's communications. Please produce responsive record in native file format with metadata intact.

Note: If any such document was but is no longer in the Company's possession or subject to its control, state what disposition was made of it and why it was so disposed.

- b. Please identify and produce any policy or written explanation of process for a DSM Advisory Group participant to request a meeting, if any.
- 4.11. Please refer to Lana Isaacson's Rebuttal Testimony, page 4, lines 9-10, stating that "[t]he Companies have historically assumed \$0 avoided T&D costs in evaluating DSM-EE programs," and the August 7, 2025 HVT at approximately 12:09-12:11, and answer the following requests.
- a. State the Companies' total transmission plant net book value at the end of 2024.
 - b. State the Companies' total distribution plant net book value at the end of 2024.
 - c. State the approximate portion of the Companies' respective revenue requirements attributable to transmission- and distribution-related cost recovery.
 - d. Confirm that through the Transmission System Improvement Program, or TSIP, the Companies spent \$719.6 million in transmission related capital projects (\$118.3 million in reliability improvements and \$601.3 million in resiliency improvements) over the five-year period of 2017-2021. If anything but confirmed, please explain.
 - e. Confirm that "From January 1, 2022 to June 30, 2026, the Companies have spent and plan to spend over one billion dollars (\$1,024 million) in capital on transmission-related projects." If anything but confirmed, please explain.

[Signatures on next page]

Respectfully Submitted,



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CERTIFICATE OF SERVICE

In accordance with the Commission's July 22, 2021 Order in Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19*, this is to certify that the electronic filing was submitted to the Commission on Aug. 13, 2025; that the documents in this electronic filing are a true representation of the materials prepared for the filing; and that the Commission has not excused any party from electronic filing procedures for this case at this time.



Byron L. Gary

ATTACHMENT

From: Sarah Pierce [REDACTED]
Date: Wed, Aug 7, 2024 at 12:22 PM
Subject: Re: DSM Advisory Group
To: Hayden, John [REDACTED]

Hi John,
Thanks for the update. We were under the impression we would be meeting in August or at least in the fall. Can we go ahead and get that scheduled? The advisory group is looking forward to further discussing the DSM programs in depth.
Thank you,
Sarah



Sarah Pierce
Housing & Energy Affordability Program Coordinator
[REDACTED] (cell) [REDACTED]g

On Wed, Aug 7, 2024 at 9:33 AM Hayden, John <[REDACTED]> wrote:
Sarah,
Thanks for reaching out...we don't have one planned at this time.

-jh

John Hayden
Senior Planning & Development Specialist
Planning & Development | Energy Efficiency | Emerging Business
LG&E and KU Energy LLC
[220 West Main Street, Louisville, KY 40202](#)
Office: [REDACTED] 8
[REDACTED]

Business Use

From: Sarah Pierce [REDACTED]
Sent: Friday, August 02, 2024 2:50 PM
To: Hayden, John [REDACTED]
Subject: DSM Advisory Group

You don't often get email from [REDACTED]. [Learn why this is important](#)
EXTERNAL email. STOP and THINK before responding, clicking on links, or opening attachments.

Hi there!
I hope you are well. I am reaching out to see if you all have a tentative date and/or Doodle poll for the next DSM advisory group meeting. I vaguely remember August being mentioned, so I wanted to make sure we had it on our calendars!
Thanks,
Sarah



Sarah Pierce
Housing & Energy Affordability Program Coordinator
[REDACTED] (cell) [REDACTED]g