

**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)	Case No. 2025-00045
CERTIFICATES OF PUBLIC CONVENIENCE)	
AND NECESSITY AND SITE COMPATIBILITY)	
CERTIFICATES		

**SIERRA CLUB’S REPLY IN SUPPORT OF MOTION FOR RELIEF REGARDING WITNESS
AVAILABILITY AND RESPONSE TO MOTIONS OF CERTAIN PARTIES TO EXCUSE
WITNESSES OR FOR DATES CERTAIN**

Comes now, Sierra Club, by and through its counsel, and files this Reply in support of our motion for a date certain for out-of-state witnesses and Response to the motions to excuse witnesses of certain parties:

1. In its Response, the Companies state that the Companies should be permitted to present their witnesses “first and without interruption at the hearing in this proceeding.”¹ Sierra Club does not oppose the Companies position and we concede this point. We expect to complete our cross examination of Companies witnesses on Monday, August 4, first day of the hearing, though we cannot control the cross examination plans of the other parties, Commission Staff, or the Commissioners. If Company witnesses are still on the stand on Tuesday morning, Sierra Club agrees that our witnesses will take the stand after cross of Companies’ witnesses is completed.
2. In its Response, the Companies claim that providing an out-of-state witness with a date certain would “unduly complicat[e] or disrupt[e] the proceedings.”² Not so. In fact, providing a date certain for out-of-state witness is a common courtesy provided to such witnesses to allow them to

¹ Joint Response of Kentucky Utilities Company and Louisville Gas And Electric Company to Sierra Club’s Motion for Relief Regarding Witness Availability, dated July 31, 2024 (“Response”), at 1.

² Response at 1.

scheduled their travel efficiently and meet other professional commitments, while having minimal impact on any other party to this proceeding.

3. Sierra Club does not oppose the motion to excuse witnesses of the Attorney General, Kentucky Industrial Utility Customers, Inc., or the Kentucky Coal Association.
4. Sierra Club does not oppose the motion of the Southern Renewable Energy Association that seeks a date certain for SREA's witnesses.

We respectfully continue to ask for a date certain of Tuesday, August 5 for our out-of-state witnesses, and we accept the condition that Sierra Club witnesses would take the stand only when the Companies have completed presenting their witnesses.

Dated: July 31, 2025

Respectfully submitted,

/s/ Joe F. Childers

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CERTIFICATE OF SERVICE

This is to certify that the foregoing copy of Sierra Club's Reply in Support of Motion For Relief Regarding Witness Availability and Response to Motions of Certain Parties to Excuse Witnesses in this action is being electronically transmitted to the Commission on July 31, 2025, and that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding.

/s/ Joe F. Childers

JOE F. CHILDERS