

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matters of:

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

**SOUTHERN RENEWABLE ENERGY ASSOCIATION’S INITIAL
REQUESTS FOR INFORMATION TO LOUISVILLE GAS
AND ELECTRIC COMPANY AND KENTUCKY UTILITIES COMPANY**

Comes now the Southern Renewable Energy Association (also “SREA”), by and through counsel, and, in accordance with the Public Service Commission’s Order dated October 30, 2024 respectfully tenders its Initial Requests for Information to Louisville Gas and Electric Company (“LG&E”) and Kentucky Utilities Company (“KU” and collectively “Companies”) into the record of the instant case. SREA acknowledges that the Commission has not entered an Order addressing SREA’s Motion to Intervene; therefore, SREA provisionally tenders these requests (pending entry of an Order).

- 1) In each case in which a request seeks information provided in response to a request of Commission Staff, reference to the Companies’ response to the appropriate Staff request will be deemed a satisfactory response.
- 2) Please identify the Companies’ witness who will be prepared to answer questions concerning the request during an evidentiary hearing.

- 3) These requests shall be deemed continuing and, therefore, require further and supplemental responses if the Companies receive or generate additional information within the scope of these request between the time of the response and the time of any evidentiary hearing held by the Commission.
- 4) If any request appears confusing, please request clarification directly from Counsel for SREA as soon as reasonable.
- 5) 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.
- 6) 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 who is not familiar with the printout.
- 7) If the Companies have any objections to any request on the grounds that the requested information is proprietary in nature, or for any other reason, please notify Counsel for SREA as soon as reasonable.
- 8) For any document withheld on the basis of privilege, state the following: Date; author; addressee; indicated or blind copies; all person to whom distributed, shown, or explained; and the nature and legal basis for the privilege asserted.
- 9) In the event that any document called for has been destroyed or transferred beyond the control of the Companies, 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 policy.

10)As the Companies discover errors in its filing and/or responses, please provide an update as soon as reasonable that identifies such errors and provide the document to support any changes.

WHEREFORE, SREA respectfully submits its Initial Requests for Information to the Companies.

Respectfully submitted,

/s/ Randal A. Strobo

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NOTICE AND CERTIFICATION FOR FILING

Undersigned counsel provides notices that the electronic version of the paper has been submitted to the Commission by uploading it using the Commission's E-Filing System on this 28th day of March 2025. Pursuant to the Commission's July 22, 2021 Order in Case No. 2020-00085 (Electronic Emergency Docket Related to the Novel Coronavirus COVID-19), the paper, in paper medium, is not required to be filed.

/s/ Randal A. Strobo

NOTICE CONCERNING SERVICE

The Commission has not yet excused any party from electronic filing procedures for this case.

/s/ Randal A. Strobo

**STRENGTHENED REGULATORY ENVIRONMENT
INITIAL REQUESTS FOR INFORMATION TO
LOUISVILLE GAS AND ELECTRIC COMPANY AND
KENTUCKY UTILITIES COMPANY
KY PSC CASE NO. 2025-00045**

1. Reference: Direct Testimony of Lonnie E. Bellar (“Bellar Direct”), page 3, lines 7 through 10. In terms of efforts to “induce data centers to locate in Jefferson County,” please explain the Companies’ role including the foundation or basis for that role.
2. Reference: Bellar Direct, page 5, line 20 through page 6, line 14. In developing the proposed resource plan, what role, if any, did ownership of the proposed generation assets by the Companies serve in the decision process? If the Companies’ ownership of the proposed generation assets did not influence the decision process, please confirm this fact.
3. Reference: Bellar Direct, page 7, lines 15 through 17. In that the Brown BESS project remains “pending final determination of critical equipment and appropriate contracting,” please explain whether the Companies expect a similar determination for the proposed BESS facility at the Cane Run Generation Station. If yes, indicate the date by which the Companies expect the final determination. If no, explain why there are different expectations for Brown BESS and the proposed BESS facility at the Cane Run Generation Station.
4. Reference: Direct Testimony of Robert M. Conroy (“Conroy Direct”), page 7, line 12 through page 8, line 9. In developing the proposed resource plan, what role, if any, did considerations regarding ownership of versus contracting for the necessary resources serve in the decision process? If the proposed resource plan was developed without any consideration of ownership versus contracting, please confirm this fact.
5. Reference: Conroy Direct, page 9, lines 1 through 11. Explain how the Companies’ proposal demonstrates an engagement of an “all-of-the-above approach to electric generation resources” given that only one (1) of the eight (8) resources, natural gas, identified in this testimony will serve as the electric generation resource for the two (2) new generation facilities, Brown 12 and Mill Creek 6.
6. Reference: Direct Testimony of John Bevington (“Bevington Direct”), page 13, line 6 through page 14, line 14; and Conroy Direct, page 3, line 9 through page 5, line 14. Given the service obligation, as identified and described in the Conroy Direct testimony, explain how the Companies have the discretion to withdraw or terminate a transmission service request (“TSR”) concerning a potential customer.
7. Reference: Application, pages 11 and 12, paragraph 17. The Application states, at pertinent part, “the Companies will construct Brown 12, Mill Creek 6, the Cane Run BESS, and the Ghent 2 SCR primarily through a self-build process.” Also

reference the Volume I, page 8-13 (PDF 98) of the Companies' 2024 Joint Integrated Resource Plan in KY PSC Case No. 2024-00326, which states that "As needed, the Companies use an RFP process to obtain offers for energy and capacity from the electricity market."

- a. Did the Companies engage in a request for proposals (RFP) process prior to deciding to construct the proposed projects through a self-build process?
- b. If the Companies engaged in an RFP process, did the Companies bid the self-build proposals into the RFP process?
- c. If the Companies did not engage in an RFP process to obtain offers for energy and capacity from the electricity market, please explain the Companies' decision.
- d. Please provide any applicable documentation that was used to support the decision about whether to conduct an RFP process, including any memoranda, workpapers, emails, and other communications that discuss the decision about whether an RFP process was needed.