

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
SUPPLEMENTAL 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 Supplemental 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.

- 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 Supplemental Requests for Information to the Companies.

Respectfully submitted,

/s/ David E. Spenard

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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 2nd day of May 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/ David E. Spenard

NOTICE CONCERNING SERVICE

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

/s/ David E. Spenard

**SREA SUPPLEMENTAL REQUESTS FOR INFORMATION TO
LOUISVILLE GAS AND ELECTRIC COMPANY AND
KENTUCKY UTILITIES COMPANY
KY PSC CASE NO. 2025-00045**

1. Reference: Response to Public Service Commission Staff's First Request for Information, Question 2(a) ("Staff 1-___").
 - a. For each of the ten (10) wind installations, (i) identify the Kentucky County in which the facility is located and (ii) whether the facility is located within KU's certified service territory, LG&E's certified service territory, or not located within either Company's certified service territory.
 - b. For the hydro installation, (i) identify the Kentucky County in which the facility is located and (ii) whether the facility is located within KU's certified service territory, LG&E's certified service territory, or not located within either Company's certified service territory.
 - a. Clarify whether the Companies classify a battery storage installation as a "generation" resource. If the Companies classify battery storage as a generation resource, explain why.
 - a. Response to Staff 1-5(b). With regard to electric vehicle charging, what are the Companies' assumptions regarding the percentage of electric vehicle charging that will take place at a residence as compared to electric vehicle charging that will take place at a non-residential charging station (in the hourly load forecast process)?
2. Reference: Response to Staff 1-7.
 - a. The response states: "The Companies have sufficient space at currently-owned generation properties to construct the additional generation required to serve the noted additional load." In a scenario which the Companies are "required to serve" the entire 8,000 MW of load and projects, what considerations concerning transmission are relevant to selecting the property or properties that will be used in the construction of the additional generation facilities for this load and projects?
 - b. If additional generation facilities (beyond those requested through the instant application and under the assumption that certificates are granted in the instant case) are sought in a subsequent case or cases prior to the completion of any transmission upgrade or modifications necessary for supporting service through the facilities sought through this application, is there a risk that costs will be incurred for transmission upgrades or modifications that will not be sufficient to support such additional (subsequently sought) generation facilities? Otherwise stated: Is there a risk that the Companies may spend funds

on a transmission upgrade or modification project which will be inadequate (prior to going into service) due to subsequent increases in generation facilities beyond those sought by the Companies in the instant CPCN proceeding? If yes, explain any steps or measures the Companies are taking to minimize this risk. If no, explain why not.

3. Reference: Response to Staff 1-18(c).

- a. At pertinent part, concerning "Prospect" project stage status, the response includes the following statement: "There are currently six projects in this stage, representing 2,200 MW of peak demand. The Companies have submitted three TSRs for two projects in this stage." Have the Companies submitted more than one (1) TSR for either of the two projects for which the three (3) TSRs have been submitted? If yes, explain why there has been a submission of more than one (1) TSR for the same project. If no, explain why three (3) TSRs have been submitted for two (2) projects.
- b. At pertinent part, concerning "Imminent" project stage status, the response includes the following statement: "There is currently one project in this stage, representing 402 MW. The Companies have submitted two TSRs for this project." Explain why the submission of two (2) TSRs for this project is necessary or otherwise caused.
- c. With regard to "upgrades or modifications to the transmission system necessary to accommodate the TSR," are any costs associated with these upgrades or modifications collected from the developer prior to the customer receiving service from the upgraded or modified transmission system? If yes, (i) what costs are collected, and (ii) will the collection of these costs through the same collection mechanism used prior to service continue after service commences or will a different mechanism for collecting these costs apply?

4. Reference: Response to Staff 1-23. At pertinent part, the response includes the following statement: "Therefore, to evaluate resources on an equal footing, the Companies completed the analysis with no transmission system upgrade costs." Explain whether and, if applicable, how the Companies' evaluation subsequently included transmission system upgrade costs in their analysis. If transmission system upgrade costs have been excluded from the analysis, is the exclusion premised upon such costs being immaterial?

5. Reference Response to Staff 1-28.

- a. When is a TSR required as a condition of receiving service or continuing to receive service under either one of the Companies' Retail Transmission Service (RTS) tariff?

- b. Can the Companies' transmission operator approve for either Company transmission service to a customer in the absence of a TSR? If yes, explain how.
 - c. [Additional reference: The "Term of Contract" provision in each of the Companies' RTS tariff and Response to Staff 1-28(c).] At pertinent part, the response states: "Finally, regarding service terms for data center customers, the Companies anticipate a combination of minimum contract duration, minimum contract demand, and credit support, assurance, or security requirements will help mitigate the risks addressed in this request." For service under the RTS tariffs, since January 1, 2015, has either Company required a "longer fixed term of contract and termination notice because of conditions associated with the Customer's requirements for service"? If yes, (i) identify each instance in which such a longer fixed term of contract and termination notice has been required, (ii) the longer fixed term of contract and termination notice, and (iii) the conditions associated with the customer's requirements for service serving as the basis for the imposition of the requirement.
 - d. Are there scenarios in which data centers or other projects that will have a twelve (12)-month-average monthly minimum demand exceeding 250 kVA could receive service from either of the Companies through a tariff and/or special contract other than a RTS tariff (or is the RTS tariff the exclusive means through which such a customer may receive service)?
 - e. By Company, for both January 1, 2015 and separately again for January 1, 2025, provide a schedule indicating how many customers were receiving service under each Company's RTS tariff on each date?
6. Reference: Response to Attorney General and Kentucky Industrial Utility Customers' Initial Data Request, Question No. 19 ("AG KIUC 1-__"): Staff 1-96. At pertinent part, the response states: "The Companies will not commit to serving data center load if they cannot do so reliably."
- a. Explain the role, if any, that TSRs serve in determining whether the data center load can be reliably served.
 - b. Explain whether and, if applicable, how the Companies can decline to serve a data center or other large project (with a minimum demand or a proposed minimum demand exceeding 250 kVA).
 - c. With regard to the term "commit" as that term is used in the response, (i) how do the Companies "commit," (ii) at what stage in the process of a data center or other large project proposal must the Companies either "commit" or decline to commit, and (iii) what role and/or responsibilities, if any, does the developer of a data center or other large project have concerning reliability including developer responsibility for funding any generation, transmission, and/or

distribution upgrades or modifications necessary for reliable service for the proposed data center or other large project?

7. Reference: Response to Louisville/Jefferson County Metro Government and Lexington-Fayette Urban County Government's First Request for Information, Question 16 ("Louisville Metro LFUCG 1-__").
 - a. What additional steps and/or approvals (including local (Hardin County) government, board, or agency approvals), if any, are necessary for the Rhudes Creek Solar project to move forward into construction if construction has yet to commence?
 - b. If the project is under construction such that it can be substantially completed in the absence of any additional local (Hardin County) government, board, or agency approvals, state the start date of the construction.
 - c. When do the Companies expect the Rhudes Creek solar facility to go into service (and explain the basis for the expectation)?
8. Reference: Response to Louisville Metro LFUCG 1-35. At pertinent part, the response states: "The EPC contract requires the potential customer to bear costs until the customer begins to take service, which can be tens of millions of dollars." What, with regard to the customer bearing costs, does the EPC contract require after the customer begins to take service?
9. Reference: Southern Renewable Energy Association's Initial Request for Information, Question 5 ("SREA 1-__"). In that Mr. Conroy's direct testimony in support of the application does not enumerate battery storage among the identified "electric generation resources," is it the position of the Companies that battery storage, of itself, is an electric generation resource?
10. Reference: SREA 1-6. By Company, and by year for each year from January 1, 2015 to present, identify the TSRs concerning a potential customer that have been withdrawn or terminated. For each TSR that was withdrawn or terminated, state the reason why the TSR was withdrawn or terminated.