

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

**JOINT DATA REQUESTS OF
KENTUCKY UTILITIES COMPANY AND
LOUISVILLE GAS AND ELECTRIC COMPANY
PROPOUNDED TO THE ATTORNEY GENERAL AND
KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC.**

Kentucky Utilities Company (“KU”) and Louisville Gas and Electric Company (“LG&E”) (collectively, “Companies”) respectfully submit the following data requests to the Attorney General and Kentucky Industrial Utility Customers, Inc. (collectively, “AG-KIUC”) to be answered by the date specified in the procedural schedule established by the Kentucky Public Service Commission (“Commission”) in this matter on May 29, 2025.

Instructions

1. As used herein, “Documents” include all correspondence, memoranda, notes, email, maps, drawings, surveys or other written or recorded materials, whether external or internal, of every kind or description in the possession of, or accessible to, AG-KIUC, its witnesses, or its counsel.
2. Please identify by name, title, position, and responsibility the person or persons answering each of these data requests.

3. These requests shall be deemed continuing so as to require further and supplemental responses if AG-KIUC receives or generates additional information within the scope of these requests between the time of the response and the time of any hearing conducted herein.

4. If the specific document, work paper, or information requested does not exist but a similar document, work paper, or information does exist, provide the similar document, work paper, or information.

5. Please provide all responsive electronic documents in native file format with all information unprotected and unhidden, including without limitation all formulas in spreadsheets, and with all metadata intact and unchanged. For each such electronic document, please identify and explain all elements thereof that would not be self-evident to a person unfamiliar with the document or file, e.g., file names or column labels.

6. If AG-KIUC objects to any request on the ground that the requested information is proprietary in nature, or for any other reason, please notify the undersigned counsel as soon as possible.

7. For any document withheld on the ground of privilege, state the following: date; author; addressee; indicated or blind copies; all persons to whom distributed, shown or explained; and the nature and legal basis for the privilege asserted.

8. If any document requested has been destroyed or transferred beyond the control of AG-KIUC, its counsel, or its witnesses, 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 such a document was destroyed or transferred by reason of a document retention policy, describe in detail the document retention policy.

9. Unless otherwise stated in the request, if a document responsive to a request is a matter of public record, please produce a copy of the document rather than a reference to the record where the document is located.

Data Requests

General: All Witnesses

1. In Excel spreadsheet or other format, with all formulas, columns and rows unprotected and fully accessible, please provide all workpapers and source documents not previously provided.

Witness: Lane Kollen

2. Please refer to Mr. Kollen's testimony at page 14, lines 3-5: "I recommend the GCRR allocation and rate design follow the Group 1/Group 2 methodology previously authorized for the Companies' environmental surcharges and Retired Asset Recovery Riders." Please explain the substantive rationale for this position, and please provide citations to relevant Commission orders supporting that substantive rationale.
3. Please refer to Mr. Kollen's testimony at pages 12-15. Please explain why the proposed Generation Cost Recovery Rider would be necessary if the Companies "pre-sold" 85% of the capacity of Mill Creek 6 under Rate EHLF with the modification Mr. Kollen proposed (minimum demand charge of 90% of maximum contract capacity with no ramp).

Witness: Leah J. Wellborn

4. Please refer to Ms. Wellborn's testimony at page 19, lines 10-13: "I recommend the Commission require the Companies make another filing in this same proceeding before they commence site construction of Mill Creek 6 to demonstrate they have

met the conditions of these threshold requirements, and obtain Commission approval to proceed with site construction.”

- a. Please explain in detail what Ms. Wellborn proposes the Companies would have to file and demonstrate in the proposed follow-up filing.
- b. Please explain why additional Commission approval would be necessary if the Companies demonstrated in a simple informational filing that they met the conditions of the initial CPCN approval.
- c. Please explain what the follow-up approval proceeding would consist of and what Ms. Wellborn would expect the procedural schedule to be (both in terms of elements and timing).

Dated: June 23, 2025

Respectfully submitted,



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*Counsel for Louisville Gas and Electric Company
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CERTIFICATE OF SERVICE

In accordance with the Commission's Order of July 22, 2021 in Case No. 2020-00085 (Electronic Emergency Docket Related to the Novel Coronavirus COVID-19), this is to certify that the electronic filing has been transmitted to the Commission on June 23, 2025, and that there are currently no parties in this proceeding that the Commission has excused from participation by electronic means.

A handwritten signature in blue ink, appearing to read "A. B. Smith", is written above a horizontal line.

*Counsel for Kentucky Utilities Company and
Louisville Gas and Electric Company*