

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
KENTUCKY COAL ASSOCIATION, INC.

Kentucky Utilities Company (“KU”) and Louisville Gas and Electric Company (“LG&E”) (collectively, “Companies”) respectfully submit the following data requests to the Kentucky Coal Association, Inc. (“KCA”) 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, KCA, 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 KCA 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 KCA 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 KCA, 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: Emily Medine

2. Attachment ESM-1 at page 2 (page 28 of the testimony) states, “Ms. Medine prepares analyses and testimony in support of clients involved in regulatory and legal proceedings. She provides testimony in commission hearings on fuel procurement issues and arbitration proceedings on contract disputes and damages. Ms. Medine regularly speaks at industry meetings.”
 - a. Please provide a complete list of every engagement where Ms. Medine has prepared analyses and testimony in support of clients involved in regulatory and legal proceedings, including every case or docket, jurisdiction, name of the client she represented and a copy of the analysis or testimony.
 - b. Please provide a complete list of each and every engagement where Ms. Medine has prepared testimony or analysis in connection with the representation of a coal company or coal industry association, including the scope of the engagement, the forum, if any, where Ms. Medine provided any testimony or analysis and a copy of any such testimony or analysis.

- c. Please provide a complete list of every occasion where Ms. Medine has spoken at industry meetings, including the date and location of the meeting, the name of the industry meeting and a copy her presentation or remarks.
- 3. Please provide a complete copy of all testimony (including transcripts of live testimony), interviews, articles, publications, or any other public writings or statements of any kind in which Ms. Medine supported or advocated for any entity's construction or acquisition of any natural gas fired electric generating unit. If a transcript of relevant live testimony, an interview, or other public non-written statement is unavailable, please provide a link to where the video may be found. For each item provided (if any), please state whether Ms. Medine supported or advocated for the relevant entity's construction or acquisition of a natural gas fired electric generating unit to facilitate the retirement of, or in lieu of adding or acquiring, coal-fired generation.
- 4. Assume a utility decides on January 1, 2026, to add a Small Modular Reactor to its generation fleet. Provide a timeline detailing all necessary steps from that date forward until the SMR would be in commercial operation. If the state in which this occurs matters, assume it is Kentucky.
- 5. Please see Ms. Medine's testimony at page 2. Please provide a citation to the record supporting the statement, "The Companies acknowledged they will be challenged to meet the construction dates put forward in their IRP."

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 positioned above a horizontal line.

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