

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 KENTUCKIANS FOR THE COMMONWEALTH,
KENTUCKY SOLAR ENERGY SOCIETY,
METROPOLITAN HOUSING COALITION,
AND MOUNTAIN ASSOCIATION**

Kentucky Utilities Company (“KU”) and Louisville Gas and Electric Company (“LG&E”) (collectively, “Companies”) respectfully submit the following data requests to the Kentuckians for the Commonwealth, Kentucky Solar Energy Society, Metropolitan Housing Coalition, and Mountain Association (collectively, “Joint Intervenors”) 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, Joint Intervenors, their witnesses, or their 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 Joint Intervenors receive or generate 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 Joint Intervenors object 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 Joint Intervenors, their counsel, or their 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: Sean O’Leary

2. Refer to Mr. O’Leary’s testimony at page 17. Provide support for the statement that “higher-than-forecasted load growth would require lower-than-forecasted prices to make computing accessible to a much larger universe of users,” including without limitation copies of or hyperlinks to all source documents or other information upon which Mr. O’Leary relied to make this statement.

Witness: Elizabeth A. Stanton

3. Please refer to Ms. Stanton’s testimony at page 46, lines 8-9.
 - a. Please quantify Ms. Stanton’s asserted “difference in project likelihood between inquiries from real estate developers and inquiries from data center operators.”
 - i. Please provide all workpapers in native format with formulas intact supporting Ms. Stanton’s quantification.
 - ii. If Ms. Stanton cannot quantify the asserted difference, please explain why not.

- b. Please provide copies of or hyperlinks to all source documents or other information upon which Ms. Stanton relied to assert the existence of a “difference in project likelihood between inquiries from real estate developers and inquiries from data center operators.”
- 4. Please refer to Table 7 on page 40 of Ms. Stanton’s testimony.
 - a. Has any other state or federal regulatory agency adopted Ms. Stanton’s full proposed collection of 25 pass-fail criteria to evaluate data center load forecasts? If so, please state which agencies have done so, when they did so, and provide copies of or hyperlinks to all source documents or other information showing they did so.
 - b. For each of the 25 criteria, please list all state or federal regulatory agencies that have adopted the criterion as a probability weighting for evaluating or performing load forecasts and the probability each such agency has assigned to the criterion. Please provide copies of or hyperlinks to all supporting source documents or other supporting information.
 - c. Please provide copies of or hyperlinks to all source documents or other information upon which Ms. Stanton relied to assign an equal probability weighting (i.e., 4%) to each of the 25 criteria listed in the table.
- 5. Please refer to Ms. Stanton’s testimony at page 35, lines 2-5. Please quantitatively define the following terms used in the cited sentence:
 - a. Short-term
 - b. Large customer load
 - c. High likelihood

- d. Merely speculative
- e. Low likelihood

Dated: June 23, 2025

Respectfully submitted,



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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*