

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 SIERRA CLUB**

Kentucky Utilities Company (“KU”) and Louisville Gas and Electric Company (“LG&E”) (collectively, “Companies”) respectfully submit the following data requests to the Sierra Club 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, Sierra Club, 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 Sierra Club 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 Sierra Club 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 Sierra Club, 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: Chelsea Hotaling

2. Please refer to Ms. Hotaling's testimony at page 16. Why is Ms. Hotaling not taking a position on whether data center load will ever materialize in the Companies' service territories?
3. If the proposed NGCCs are constructed and data centers never materialize in the Companies' territories, identify all options the Companies could pursue to sell or otherwise utilize the power produced by the NGCCs.
4. Please refer to Ms. Hotaling's testimony at footnotes 40, 41, 43, 44, 45, and 46. The links in these footnotes do not lead to the referenced PDF files. Please provide the referenced PDF files.
5. Please refer to Ms. Hotaling's testimony at page 30. Provide a listing of all potential customer loads in the Companies' queue that are also in another utility's queue. For each item listed, please provide all citations, documents, and other information supporting Ms. Hotaling's assertions concerning such customer load.
6. Please refer to Ms. Hotaling's testimony at page 37, line 4. Identify all of the "other jurisdictions," provide the name of the utility involved in those other jurisdictions, cite the case number in which Ms. Hotaling's experience occurred, and the specific documents in that case(s) supporting Ms. Hotaling's assertions.

Witness: Stacy L. Sherwood

7. Please refer to Ms. Sherwood's testimony at page 7, lines 8-9: "However, the \$3 million savings in rate case cost would come at the carrying cost expense of \$406 million." Please explain in detail why it is reasonable to compare these two values.

Witness: Jeremy Fisher

8. Please refer to Mr. Fisher's testimony at page 6. Identify the 17 utility parent companies that purport to have over 409 GW of data center load in their economic development pipeline. Identify the amount of load stated for each parent company totaling the 409 GW. Provide copies of or cites to the documents supporting the 409 GW total Mr. Fisher states. Provide all workpapers supporting this analysis.
9. Please refer to Mr. Fisher's testimony at pages 6-7. Identify the 6 utility parent companies that purport to have over 300 GW of unspecified economic development pipeline load. Identify the amount of load stated for each parent company totaling the 300 GW. Provide copies of or cites to the documents supporting the 300 GW total Mr. Fisher states. Provide all workpapers supporting this analysis.
10. Please refer to Mr. Fisher's testimony at pages 11-12. Identify the 64 primarily large investor-owned utilities. The 396 GW stated is not the total of the numbers that follow. Identify the amount of load stated for each of the 64 companies' studies and provide copies of or citations to the documents supporting the 396 GW Mr. Fisher states.
11. Please refer to Mr. Fisher's testimony at pages 11-12. Identify the five utilities cited at p. 11, line 18. Provide documentation supporting the statement that "many implied that these inquiries were heavily influenced by data centers."

12. Please refer to Mr. Fisher's testimony at page 12, lines 3-4. Identify the 20 utilities referenced and provide the amount each one contributes to the stated 697 GW. Provide copies of or cites to the documents supporting the 697 GW total Mr. Fisher states. Provide all workpapers supporting this analysis.

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.



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