

**COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION**

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

**THIRD SET OF DATA REQUESTS OF ATTORNEY GENERAL AND KIUC
TO KENTUCKY UTILITIES COMPANY AND
LOUISVILLE GAS & ELECTRIC COMPANY**

Comes now the Attorney General of the Commonwealth of Kentucky, by his Office of Rate Intervention (“Attorney General”) and Kentucky Industrial Utility Customers (“KIUC”), and submit these Third Set of Data Requests to Kentucky Utilities Company and Louisville Gas and Electric Company (hereinafter “KU”, “LG&E,” or collectively “KU/LG&E” or “Companies”) to be answered by June 2, 2025 in accord with the following:

(1) In each case where a request seeks data provided in response to a staff request, reference to the appropriate requested item will be deemed a satisfactory response.

(2) Identify the witness who will be prepared to answer questions concerning each request.

(3) Repeat the question to which each response is intended to refer.

(4) These requests shall be deemed continuing so as to require further and supplemental responses if the company receives or generates additional information within the scope of these requests between the time of the response and the time of any hearing conducted hereon.

(5) Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association, be accompanied by a signed certification of the preparer or person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person’s knowledge, information, and belief formed after a reasonable inquiry.

(6) If you believe any request appears confusing, please request clarification directly from undersigned Counsel for the Office of Attorney General.

(7) 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.

(8) 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 not familiar with the printout.

(9) If the company has objections to any request on the grounds that the requested information is proprietary in nature, or for any other reason, notify the Office of the Attorney General as soon as possible, and in accordance with Commission direction.

(10) As used herein, the words “document” or “documents” are to be construed broadly and shall mean the original of the same (and all non-identical copies or drafts thereof) and if the original is not available, the best copy available. These terms shall include all information recorded in any written, graphic or other tangible form and shall include, without limiting the generality of the foregoing, all reports; memoranda; books or notebooks; written or recorded statements, interviews, affidavits and depositions; all letters or correspondence; telegrams, cables and telex messages; contracts, leases, insurance policies or other agreements; warnings and caution/hazard notices or labels; mechanical and electronic recordings and all information so stored, or transcripts of such recordings; calendars, appointment books, schedules, agendas and diary entries; notes or memoranda of conversations (telephonic or otherwise), meetings or conferences; legal pleadings and transcripts of legal proceedings; maps, models, charts, diagrams, graphs and other demonstrative materials; financial statements, annual reports, balance sheets and other accounting records; quotations or offers; bulletins, newsletters, pamphlets, brochures and all other similar publications; summaries or compilations of data; deeds, titles, or other instruments of ownership; blueprints and specifications; manuals, guidelines, regulations, procedures, policies and instructional materials of any type; photographs or pictures, film, microfilm and microfiche; videotapes; articles; announcements and notices of any type; surveys, studies, evaluations, tests and all research and development (R&D) materials; newspaper clippings and press releases; time cards, employee schedules or rosters, and other payroll records; cancelled checks, invoices, bills and receipts; and writings of any kind and all other tangible things upon which any handwriting, typing, printing, drawings, representations, graphic matter, magnetic or electrical impulses, or other forms of communication are recorded or produced, including audio and video recordings, computer stored information (whether or not in printout form), computer-readable media or other

electronically maintained or transmitted information regardless of the media or format in which they are stored, and all other rough drafts, revised drafts (including all handwritten notes or other marks on the same) and copies of documents as hereinbefore defined by whatever means made.

(11) For any document withheld on the basis 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.

(12) In the event any document called for has been destroyed or transferred beyond the control of the company, please 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 retention policy.

(13) Provide written responses, together with any and all exhibits pertaining thereto, in one or more bound volumes, separately indexed and tabbed by each response, in compliance with Kentucky Public Service Commission Regulations.

(14) “And” and “or” should be considered to be both conjunctive and disjunctive, unless specifically stated otherwise.

(15) “Each” and “any” should be considered to be both singular and plural, unless specifically stated otherwise.

**THIRD SET OF DATA REQUESTS OF ATTORNEY GENERAL AND KIUC
TO KENTUCKY UTILITIES COMPANY AND
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Case No. 2024-00045**

1. Refer to Confidential Filing Workpaper file “Exhibit TAJ-2 - CONFIDENTIAL\Load_Forecasting\CPCN\Work\AWJ_JDL_Charts.xlsx” tab: “Peak_Chart_2”
 - a. Please confirm that the “without Economic Development” CPCN forecasts (columns C and H) exclude all economic development, including the projects identified in the Companies’ application (Data Centers, BOSK, Auto, etc.)
 - b. Please provide an hourly breakdown of the economic development load component forecast by economic development category (DC, BOSK, Auto, etc.) for each of the 5 CPCN forecasts for each year of the forecast. Please present each category similar to the breakdown provided for the 2024 IRP in “Exhibit TAJ-2 - CONFIDENTIAL\ Load_Forecasting\ CPCN\ Work\ 2024IRP_Mid_Econ_Dev_Requirements.xlsx”
2. See Company’s response to AG/KIUC 1-39 regarding Cane Run dispatch.
 - a. Please explain how the Companies interpret and use the Station Revenue Report provided in PROSYM.
 - b. Please provide the hourly charge and discharge energy profiles and dollar margin calculations for each Cane Run BESS resource modeled in the L1750_Eo2_MGMR run.
 - c. Please provide the Cane Run BESS average charge cost, charge GWh, discharge cost, discharge GWh, assumed efficiency (losses), and assumed resource value (margin) consistent with the Companies PROSYM Station Revenue Report under a MGMR fuel scenario 1750 MW load for each month of the study horizon.
 - d. Please confirm that the Companies PROSYM modeling for 1750 MW case provided in file, “Case No. 2025-00045 - Exhibit SAW-2 - CONFIDENTIAL\PROSYM\01_Stage1_Step2\CaseFolders\L1750Eo2\MGMR\C000\CONFIDENTIAL_2025CPCNL1750Eo2MGMRC000.yr” shows the 2031 Cane Run BESS station revenue report margin is only \$55,000 and negative for years 2036-2040. If not, confirmed, please provide the estimated “value” of the Cane Run BESS energy dispatch compared to the system lambda and/or market price modeled in PROSYM.

3. See p. 14 lines 8-10 of the Direct Testimony of John Bevington and the Companies response to AG-KIUC 2-21.
 - a. Please provide a list of the data centers or other new large load included in the Companies' load forecast that have signed an engineering, procurement, and construction ("EPC") contract.
 - b. Provide a copy of any EPC or other contracts the Companies have signed or are negotiating for transmission work that will need to be completed prior to the customer beginning to take service. Provide the total cost of each transmission project identified by new customer load as well as the estimated time to complete and expected date of completion for each transmission project identified by new customer load.
4. See the Companies response to AG-KIUC 2-40.
 - a. Provide the initial estimated costs and timeline for the study identified project transmission system related upgrades identified in the 5 TSRs that total 1,252 MW. Please include both the interconnection and system upgrade projects separately.
 - b. Please explain how the Companies will monitor and track new transmission projects attributed to data center customers.
5. Refer to the Companies' response to AG/KIUC 2-24
 - a. Does the Company have an internal policy for contracting with new customers? What requirements must be met in order to offer a contract (available capacity, appropriate contract terms, etc.)?
 - b. What internal teams approve new contracts? Who ultimately signs electric service agreements on behalf of the Companies?
 - c. Have the Companies considered a temporary pause on new data center contracts until a new large load/high load factor tariff is approved? If not, why not?
6. Please provide a copy of the study referenced in response to PSC 2-47 once completed on May 30, 2025.
7. If new federal legislation were passed modifying the availability of ITC or PTCs for BESS and/or solar, would the Companies' action plan and preferred resource plan be reevaluated?¹ If so, please explain how. If not, explain why not.
8. Please describe in detail the Companies' methodology and process for evaluating the need for entering into new or renegotiated coal supply contracts.
 - a. Please provide a copy of all coal procurement guidelines including details around contract targets by year, transportation, hedging, stockpile management, etc.

¹ <https://www.congress.gov/bill/119th-congress/house-bill/1/text>

- b. Please provide complete copies of all coal supply and transportation contracts in effect over the last three years and into future years. For each contract, identify the generating units it supplies.
- c. For each coal supply contract supplied in 3-8(a) provide a monthly comparison of the projected volume of coal and the actual volume of coal taken at each generation station in calendar year 2024. Please include the total cost of all pricing components.
- d. Describe in detail how the Companies incorporate the coal transportation and supply prices from the coal contracts into its Plexos expansion plan and PROSYM production cost modeling. Specifically, please describe how the commodity and transportation costs are included as fixed or variable in the models and whether marginal or average pricing is used.

RUSSELL COLEMAN
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**COUNSEL FOR KENTUCKY INDUSTRIAL
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Dated: May 27, 2025