

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

In the matter of: :

ELECTRONIC JOINT APPLICATION OF KENTUCKY : CASE NO. 2025-00045  
UTILITIES COMPANY AND LOUISVILLE GAS AND :  
ELECTRIC COMPANY FOR CERTIFICATES OF  
PUBLIC CONVENIENCE AND NECESSITY AND SITE :  
COMPATIBILITY CERTIFICATES  
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**KENTUCKY COAL ASSOCIATION’S FIRST REQUEST FOR INFORMATION TO  
KENTUCKY UTILITY COMPANY AND LOUISVILLE GAS & ELECTRIC COMPANY**

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The Kentucky Coal Association (KCA) intervener in this action, respectfully requests the applicant, Kentucky Utilities Company and Louisville Gas and Electric Company (collectively, the “Companies”), to respond to the First Request of Information in accordance with the Order of Procedure entered herein.

Additional Instructions

A. Each request for information shall be accorded a separate answer on a separate piece of paper, and each subpart thereof shall be accorded a separate answer. Each request or subpart thereof shall be specifically admitted or denied, and information inquiries or subparts thereof should not be combined for the purpose of supplying a common answer.

B. Restate the information inquiry immediately preceding each response.

C. Identify the name, title, and business address of each person(s) providing each response and provide the data on which the response was created.

D. In answering these requests, utilize all information and documents that are available to you, including information in the possession of any of your agents, employees or attorneys, or otherwise subject to your custody or control.

E. If you object to any part of a request, answer all parts of such interrogatories or requests to which you do not object, and as to each part to which you do object, separately set forth the specific basis for the objection.

F. If you claim any form of privilege or other protection from disclosure as a ground for withholding information responsive to a request, please explain your claim with sufficient specificity to permit KCA to make a full determination as to whether your claim is valid.

G. In each instance, the request shall be construed so as to require the most inclusive answer or production.

H. Please attach written material to any answer for which written material is requested and/or available. If such written material is not available, state where it may be obtained. Please label the written material with the number of the request to which it pertains.

#### Definitions

As used in these Requests for Information, the following terms have the meaning as set forth below:

1. "You" or "your" means the Companies or the witness, as the context requires.
2. "List", "describe", "explain", "specify" or "state" shall mean to set forth fully, in detail, and unambiguously each and every fact of which the Companies or their officers, employees, agents or representatives, have knowledge which is relevant to the answer called for by the request.
3. The terms "document" or "documents" as used herein shall have the same meaning and scope as in Rule 34 of the Kentucky Rules of Civil Procedure and shall include, without limitation, any writings and documentary material of any kind whatsoever, both originals and copies (regardless of origin and whether or not including additional writing thereon or

attached thereto), and any and all drafts, preliminary versions, alterations, modifications, revisions, changes and written comments of and concerning such material, including but not limited to: correspondence, letters, memoranda, notes, reports, directions, studies, investigations, questionnaires and surveys, inspections, permits, citizen complaints, papers, files, books, manuals, instructions, records, pamphlets, forms, contracts, contract amendments or supplements, contract offers, tenders, acceptances, counteroffers or negotiating agreements, notices, confirmations, telegrams, communications sent or received, print-outs, diary entries, calendars, tables, compilations, tabulations, charts, graphs, maps, recommendations, ledgers, accounts, worksheets, photographs, tape recordings, movie pictures, videotapes, transcripts, logs, work papers, minutes, summaries, notations and records of any sort (printed, recorded or otherwise) of any oral communication whether sent or received or neither, and other written records or recordings, in whatever form, stored or contained in or on whatever medium including computerized or digital memory or magnetic media that:

- (a) are now or were formerly in your possession, custody or control; or
- (b) are known or believed to be responsive to these requests, regardless of who has or formerly had custody, possession or control.

4. The terms "identify" and "identity" when used with respect to an entity mean to state its full name and the address of its principal place of business.

5. The term to "state the basis" for an allegation, contention, conclusion, position or answer means (a) to identify and specify the sources therefore, and (b) to identify and specify all facts on which you rely or intend to rely in support of the allegation, contention, conclusion, position or answer, and (c) to set forth and explain the nature and application to the relevant facts of all pertinent legal theories upon which you rely for your knowledge, information and/or belief

that there are good grounds to support such allegation, contention, conclusion, position or answer.

6. The terms "and" and "or" have both conjunctive and disjunctive meanings as necessary to bring within the scope of the request any information or documents that might otherwise be construed to be outside their scope; "all" and "any" mean both "each" and "every".

7. The terms "relates to" or "relating to" mean referring to, concerning, responding to, containing, regarding, discussing, describing, reflecting, analyzing, constituting, disclosing, embodying, defining, stating, explaining, summarizing, or in any way pertaining to.

8. The term "including" means "including, but not limited to."

### **FIRST REQUEST FOR INFORMATION OF KCA**

**1.1** Please provide all analyses with related assumptions performed by the Companies including those developed subsequent to the filing of the IRP, including but not limited to the following:

- a.** Possible changes in environmental requirement assumptions and the loss of credits from the Inflation Reduction Act (IRA);
- b.** Proposed and implemented tariffs that could affect the supply chain and the cost of new generation;
- c.** Continuing inflation; and
- d.** A potential economic recession related to the factors listed above.

**1.2** Do the costs for the proposed two CCGT's reflect compliance with Section 111(b) of the Clean Air Act? If yes, what is assumed: a low-capacity factor or a CCS retrofit?

**1.3** Please provide additional information supporting the Companies' revised load growth assumptions including the following:

- a. The status of the 6,000 MW potential data center demand referred to in the Testimony of John Bevington, including timing, term sheets, and exclusivity.
- b. The basis for the 2,000 MW potential load growth from industrial customers.
- c. Whether BOSK would owe the Companies Liquidated Damages (LD) if Phase 2 is not completed and /or not operated. If so, what are the estimated LD's.

**1.4** Given the change in the load growth assumptions from the 2024 IRP, the retirement of MC 2 should be reconsidered. Have the Companies evaluated the continued operation of MC 2? If so, please provide the assumptions, analysis, and findings. If not, please explain why.

**1.5** Please provide the Companies' assessment of the risks and timing of the projected increases in demand. Did the Companies consider new technologies such as "DeepSeek," which may have the potential for significantly reducing data center costs and energy demand?

**1.6** Did the Companies evaluate data center developers building dedicated generation, "behind the meter", to support their power needs?

**1.7** Please provide for the new CCGT's what the Companies evaluated in order to increase the reliability of these plants in the event of gas supply problems. Specifically, please provide any analyses of dual fuel capability and/or on-site LNG production performed by the Companies.

**1.8** Please provide the following assumptions in the CPCN for:

- a. Delivered coal prices by year for each coal plant;
- b. Delivered natural gas price curves on a monthly basis for the existing and planned CCGT's and CT's;
- c. Documentation including updated actual fuel prices through December 2024 supporting the use of the Companies "C-T-G" pricing methodology going forward

given the decline in power sector coal demand and the increase in total demand for natural gas including significantly increased LNG exports;

- d. Expected terms (duration and pricing) of firm and interruptible pipeline supply agreements; and
- e. Assumed monthly peak and off-peak energy and capacity prices through the forecast period that the Companies would pay absent the construction of adequate resources.

**1.9** In development of the IRP and CPCN did the Companies discuss energy and environmental policy with the new presidential administration? If so, please explain how the results of those discussions are addressed in the IRP and/or CPCN.

**1.10** Have the Companies engaged with the Energy & Environment Cabinet, Economic Development Cabinet, or the EPIC Commission in the development of the IRP and CPCN? If so, please explain how the interests of the Commonwealth are incorporated in the IRP and CPCN.

Respectfully submitted,

/s/Matt Malone

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**CERTIFICATE OF SERVICE**

I hereby certify that KCA's March 28, 2025 electronic filing is a true and accurate copy of KCA's pleading and Read 1<sup>st</sup> Document to be filed in paper medium; that the electronic filing has been transmitted to the Commission on March 28, 2025; that an original and one copy of the filing will not be mailed to the Commission given the pandemic orders; that there are currently no parties excused from participation by electronic service; and that, on March 28, 2025, electronic mail notification of the electronic filing is provided to all parties of record.

/s/Matt Malone

Attorney for Kentucky Coal Association, Inc.