COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

SUPPLEMENTAL DATA REQUESTS OF THE ATTORNEY GENERAL AND KIUC

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 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 May 16, 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.

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Respectfully submitted,

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Certificate of Service and Filing

Pursuant to the Commission's Orders and in accord with all other applicable law, Counsel certifies that the foregoing electronic filing was transmitted to the Commission on May 2, 2025, and there are currently no parties that the Commission has excused from participation by electronic means in this proceeding.

This 2nd day of May, 2025

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Assistant Attorney General

1. Refer to the Companies' response to AG-KIUC 1-9.
   a. Confirm that the Commission could direct the Companies to calculate AFUDC at its WACC without authorizing a regulatory asset in the same manner that Duke Energy Kentucky and Kentucky Power Company calculate AFUDC without recording a regulatory asset. If denied, then provide all authoritative support relied on for your response.
   b. Provide an AFUDC calculation template consistent with using the WACC as the AFUDC rate for Kentucky retail purposes, including, but not limited to, the calculation of the base for that purpose, e.g., prior month end CWIP balance plus half of current month cap ex times the WACC. Describe and include in the calculation template the ADIT effects, if any.
   c. Confirm the Companies' AFUDC proposal applies only to the jurisdictional portions of the new resources.
   d. Confirm that the Companies' proposal to use the WACC as the AFUDC rate will result in different AFUDC rates for each Company and will result in different installed costs per kW for each Company's share of the resources that are allocated between the two Companies.

2. Refer to the Companies' response AG-KIUC 1-10.
   a. Confirm the calculation of post in service carrying charges as requested by the Companies would be at the net of tax WACC due to the deductibility of interest expense for income tax purposes and that the net of tax WACC would be applied to a rate base reduced by the ADIT due to accelerated tax deprecation in excess of book depreciation and the ADIT due to the book tax temporary differences on the deferred operating expenses. Provide all support relied on for your response. In addition, provide a calculation template consistent with your response.
   b. Confirm that GAAP limits the calculation of post in service carrying charges or any deferred financing costs to the cost of debt because the return on equity is not considered an "expense" for deferral purposes. Provide all support relied on for your response.

3. Refer to the response to AG-KIUC 1-11(b).
   a. Indicate whether CWIP is subject to property taxes.
   b. Confirm the Companies agree that any property tax expense deferred in the year when commercial operation is achieved will be based on the January 1 valuation date in that year and not include the additional construction costs incurred after January 1 of that

year until the following year. If not, then explain why not and provide all support for your response.

4. Refer to the response to AG-KIUC 1-11(d).
   a. Confirm whether "costs associated with the underlying investments are recovered from customers on a timely basis" include cash and/or deferred recovery.
   b. Confirm whether the Companies agree it will be the Commission that determines whether the Companies acted prudently and reasonably to elect out of the normalization requirements for ITC regardless of the Companies' determination of whether "costs associated with the underlying investments are recovered from customers on a timely basis."
   c. Confirm it will be the Commission that determines the amortization period for the deferred ITC on the new battery resources/assets subject to the election to opt out of the normalization requirements, not the Companies.
   d. Confirm the Commission is not required to use the estimated service lives for the new battery resources/assets as the amortization period for the deferred ITC subject to the election to opt out of the normalization requirements because there will be no such restriction if the normalization requirements do not apply.
   e. Describe the Companies' proposed amortization period for the deferred ITC on the new battery resources/assets for purpose of its proposal to defer the operating expenses, amortization of the deferred ITC, and carrying cost on the new resources/assets post in-service until the costs are included in rates.

5. Regarding the Companies' Class Cost of Service and Cost Allocation Process.
   a. Please provide a copy of the Companies' latest Rate Class Cost of Service Study. Include all workpapers, calculations, documentation, description of methodology, including all allocators used for assigning fixed and variable costs.
   b. Have the Companies performed any pro-forma cost allocation evaluations for the new CPCN resources using cost allocation assumptions? If so, please provide the study. If not, explain why not.
   c. Have the Companies performed any evaluations for forecasted revenue related to new economic development load customers? If so, please provide the analysis and explain what assumptions were made for future revenues. If not, why not?

6. Refer to the Companies' existing rate tariff structures and environmental cost recovery surcharge.

a. Please explain how Environmental Capital additions are financed and revenue requirements determined.
b. Please provide the Companies' latest Environmental Surcharge rider calculations.
c. Please provide the Companies' most recent Environmental Surcharge report and all associated workpapers.
d. Please identify the approved tariff, relevant docket, and provide all workpapers used to determine current rates.
e. Have the Companies projected costs and revenue requirements for future Environmental compliance expenditures? Please explain and provide all analysis conducted.
f. Do the Companies treat Environmental Capital differently than environmental O&M for rate making? Please explain.

7. Refer to the Companies' currently approved Tariff RTS.
    a. Please provide the underlying rate development workpapers that describe how demand-based costs are allocated and recovered and energy assigned costs are allocated and recovered.
    b. Do the Companies recover all demand allocated costs through the Load charges? Please explain.
    c. Please provide the historic RTS tariff sheets rates for the past 10 years.

8. Have the Companies quantified the additional revenues associated with the load growth and new construction?
    a. Please provide all quantifications the Companies performed associated with the load growth and new construction.
    b. Please provide all PPL and KU/LGE investor presentations given over the past 24 months.
    c. Please provide all PPL or KU/LGE specific presentations to investors on rate base growth and expected investment and/or Return on investment.

9. Refer to AG-KIUC 1-42 which states, "if the Companies were in an over-capacity situation, they would expect to find counterparties interested in purchasing capacity and energy given the anticipated capacity shortages in multiple surrounding systems and the projected national doubling of data center demand and other anticipated load growth." See also the responses to PSC 1-28(c) and KCA 1-5.
    a. Do the Companies make capacity sales currently? If so, please explain the current rate making procedures and accounting.

b. Provide information regarding all capacity sales that were made, or capacity and energy sales, including name, counterparty, capacity, energy, and cost that the Companies have made each year over the past five years. For each of the sales note whether those sales were made because the Companies were in an over-capacity situation.
c. If the Companies were getting a deferral or alternative ratemaking recovery, what effect would the capacity sales have on the accounting treatment of the new generation units?
d. How would the Companies account for capacity sales if revenues from the sales were less than costs, or a net cost transaction? Please explain.
e. How would the Companies treat any refunds to customers coming from a sale if the revenues were greater than costs? Please explain.
f. If the Companies made a capacity sale, how would the accompanying energy be treated? Under what circumstances would the Companies account for energy sales as off system sales, and would the revenues flow through the OSS adjustment clause tariff? Please explain.

10. Refer to the Companies' response to PSC 1-66.
    a. Please provide a copy of the Companies Emergency Action Plan ("EAP")
    b. Please provide a list of the facilities covered under the referenced EAP or outline the process how the Companies develop EAPs for its facilities and what additional items are needed at BESS facilities.
    c. Have the Companies discussed the BESS resource with their insurers? If so, what will the total cost of the plan be and what is the coverage amount? Has that cost been included in the Companies' economic analysis? Please explain and identify the costs.
    d. Please provide a copy of the terms of the BESS insurance policy that have been discussed, or the terms the Companies expect to be included in an insurance policy, and if available, provide a copy of the policy document under which the BESS resource will be covered.

11. Refer to the Companies' response to AG-KIUC 1-27 and operational expectations for BESS resources.
    a. Please describe and provide any documentation the Companies have developed regarding operating plans for the BESS resource. Please include information on BMS, safety, dispatch, degradation, interconnection and any other applicable areas.
    b. Please provide the Companies operational dispatch process for the Brown and Cane Run BESS. Please include any internal documentation referenced in the response.

12. Refer to the Companies' response to AG-KIUC 1-15(e), where the Companies state, "The Companies have not performed ELCC analyses. PJM uses ELCC to support its capacity accreditation process for specific generation technologies. ELCC is not applicable to the Companies because they are not PJM members."
    a. Please explain how the Companies determined the 85% value used to translate the nameplate value to the value recorded in the load and resource balance table.
    b. Provide the study, source, or calculations used to develop the 85% capacity value assumption for Cane Run BESS in the resource assessment tables. Please describe any dispatch assumptions and assumed use case associated with that 85% value.
    c. Please explain how the Companies' methodology for assigning value to the BESS resources is different than an ELCC methodology.
    d. Have the Companies benchmarked the assumed capacity value derived for BESS against any other utilities or market projections? Please provide all industry documents in the Companies possession related to BESS valuation or ELCC forecasting.
    e. Have the Companies reviewed Kentucky Power's ("KPCO") 2022 IRP, which states "Similar to solar, storage ELCC values vary across scenarios, ranging from 66% to 80% by 2037."[1] Please compare the KPCO methodology to that relied on by KU/LGE and generally explain what accounts for the differences between the Companies' ELCC values and KPCO's ELCC values.
    f. Please explain if the Companies expect BESS capacity value to increase, decrease, or stay the same over the life of the resource. Provide year-over-year BESS capacity values, if available.

13. Regarding BESS reliability and capacity value contributions:
    a. Please explain how the Companies expect new BESS resources will dispatch during the winter peak period.
    b. Provide all evidence, studies, calculations relied on to assume a specific optimal dispatch during winter peak period.
    c. Provide all evidence, studies, and calculations on a historic basis in the Companies' possession to demonstrate BESS resource dispatch and reliability during peak winter periods, (i.e. winter storm Elliot.).

14. Refer to the Companies' response to AG-KIUC 1-27 and cost expectations for BESS resources:

[1] KPCO 2022 IRP p. 133 https://psc.ky.gov/pscecf/2023-00092/sebishop%40aep.com/03202023030104/KPCO_2022_IRP_Volume_A-Public.pdf

a. Why did the Companies choose not to perform a RFP for BESS resources? Please explain.
b. What market data points did the Companies collect for price estimates? Please provide all sources of information relied on for price estimates.
c. Did the Companies consider that they could have received asset transfer bids as part of the bids received in an RFP had an RFP been conducted? Please explain.
d. Provide all informal or formal proposals and cost estimates received.

15. Refer to the response to AG-KIUC 1-39.
    a. Have the Companies estimated what the potential revenues could be from the off-system sales ("OSS") of the BESS assets? If not, do the Companies plan on developing this ability based on the information obtained from their operational experience that can be used in future BESS proposals?
    b. Please provide the expected battery degradation of the Cane Run BESS and cost to augment the BESS. Please provide the Companies' reasoning for not including these costs and operational assumptions in the CPCN analysis.
    c. If the Companies was unable to provide a response to part b above, does that mean the Companies consider degradation or augmentation costs to be minimal? Please explain.

16. Refer to the response to LMG-LFUCG_DR1.29
    a. Did the Companies model a sensitivity for the Cane Run BESS without the 50% investment tax credit (ITC)? If not, why did the Company not choose to include this in their analysis?
    b. If the Companies are unable to receive the ITC for Cane Run, how will the Companies account for or recover the additional incremental costs not included in their analysis?

17. Please refer to Exhibit SAW-1 page 20 and table 6-5 in the LG&E KU 2024 IRP.
    a. Please provide a detailed narrative discussing why the cost projected for the Cane Run BESS project ($1,954/kW 2030$) is lower than the capital cost of the generic 4-hour BESS resource ($2,049/kW 2030$). Please reconcile the differences with a side-by-side comparison of the individual component costs deriving each value.
    b. Provide any supporting documentation that supports the decrease in price for the Cane Run BESS resource.

18. Refer to the response to AG-KIUC 1-24.
    a. Why did the Companies not perform a similar analysis to that provided in the 2024 IRP with a data center of 1,050 MW?

b. Is the IRP analysis directly comparable to the CPCN evaluations consistent with the 1,470 MW? If not provide a side-by-side comparison of the changes in assumptions that were made that led to differences in results between the two studies.
c. Refer to the Companies' response to part b and the decision to evaluate "two higher and two lower load scenarios (and not more)," which the Companies attributed to requiring a significant amount of time to evaluate. Explain exactly how much time it would have taken to perform the evaluation. Also explain why the Companies didn't believe it was worth the time that would have been required to evaluate larger sensitivity blocks to capture risk around data center load materialization.

19. Refer to the response to PSC-1-1.
    a. Please reconcile why this response shows 1,002 MW of data center plans "announced" but this amount does not show up in response to AG-KIUC which shows only 50 MW announced. Please confirm the 402 MW Data Center is in the Imminent economic development stage and provide the current economic development stage of the 600 MW data center.

20. Refer to the response to PSC-1-18.
    a. How long have the Companies utilized the five economic development project stages?
    b. Please provide any internal documentation the Companies use to assign the stage of economic development to projects.
    c. Please provide any internal documentation used to move projects from the "Inquiry" stage to the "Advanced" stage. If no internal documentation exists, please provide a narrative on how the Companies move projects through the five stages.
    d. During what stage of the economic development project stages do the Companies require the projects to request a submission of a Transmission Service Requests?

21. Refer to PSC-1-28, specifically part (b) *"The draft versions of those tariff provisions are subject to the work product doctrine. The Companies further respectfully suggest that addressing tariff issues would be more appropriate in the Companies' upcoming base rate cases than this CPCN proceeding."* and (c) *"Finally, regarding service terms for data center customers, the Companies anticipate a combination of minimum contract duration, minimum contract demand, and credit support, assurance, or security requirements will help mitigate the risks addressed in this request."*
    a. Why did the Companies choose to file for additional resources without the ability to lock the potential large load customers who are driving the need for the new generation into long-term contracts?

b. In particular, why did the Companies not choose to develop the tariffs prior to the CPCN proceeding? Please explain.
c. Is there a reason the Companies could not have filed for tariff before filing for a CPCN?
d. Do the Companies expect that customer interest could change once contract terms are known and fully understood? Please explain.
e. Would the Companies expect contracts to be a stronger indicator of commitment from prospective commitments than Transmission Service Requests? Please explain.
f. Please provide all internal documents, proposals, memos, reports, etc. that the Companies have that contemplate service terms for data center customers. Consider this an ongoing request.

22. Refer to the response to LMG-LFUCG_DR1.32 and PSC 1-17.
    a. Is the 1,002 MW for this site hosting potential or based on actual data center facilities? Please confirm that this is only for hosting potential or provide the data center design used to determine the total site load.
    b. How have the Companies verified the estimated demand for the facilities without a tenant in place? What information does the Company have regarding the prospects for obtaining tenants? Please provide.
    c. When do the Companies expect facilities in Jefferson and Oldham Counties to be online?
    d. Is it possible the tenants' ultimate use of the facilities could result in a system demand of less than 402 MW or 600 MW?
    e. Do the Companies have the ability to serve load at this site if the tenants' final demand is greater than 402 MW or 600 MW?
    f. If the Companies begin construction of new generating assets and the facilities in Jefferson and Oldham County are unable to find tenants or interconnect, how will the Companies cover the costs of construction.

23. Refer to the response to LMG-LFUCG_DR1.35
    a. What happens to the costs the customer covered during the engineering, procurement, and construction (EPC) contract after the customer begins to take service? Are these costs refunded back to the customer and the total cost of the system upgrades recovered through general rates? Please specify for both the interconnection facilities and network upgrades costs.

24. Refer to AG-KIUC 1-19 in which the Companies state, "The Companies will not commit to serving data center load if they cannot do so reliably."

   a. Explain how the Companies will determine whether or not it has sufficient resources to serve a data center customer reliably.
   b. Is this process contemplated to begin before signing any contracts?
   c. How have the Companies considered the case in which it commits to build new resources for new load, but the prospective customer load does not want to commit to staying on the system? Please explain.

25. Refer to the Companies' response to AG-KIUC 1-23.
   a. Refer to part a. Which scenarios in the CPCN evaluation algin to which scenarios in the IRP? Please provide a mapping.
   b. Refer to part b. Please explain what inputs were modified.
   c. Refer to part b. Please explain if the Companies changed financing rates or the cost of capital.
   d. Refer to part b. Please explain if the financial models provided in the CPCN are directly comparable to those in the IRP on a cost basis. If not, why not

   e. Refer to Company response to PSC 1-94, "For the reasons described in Mr. Imber's testimony, the Companies' analysis assumes the referenced EPA rule does not go into effect, and the Companies did not directly consider the rule in their resource assessment. Nonetheless, the Companies' 2024 IRP Resource Assessment demonstrates that the proposed NGCCs are least-cost even with a 40 percent capacity factor limit." Why did the Companies choose not to include the EPA-111 analysis as part of this proceeding?

26. Economic Development – Jobs Created See AG-KIUC-AG 1-44.
   a. Please explain what type of jobs, the direct jobs are expected to include, and over what duration of time are the jobs expected to exist (e.g. security, grounds maintenance, etc.). If known, provide job descriptions and details of jobs expected to be created.
   b. Please explain what type of jobs, the indirect jobs are expected to include, and over what duration of time are the jobs expected to exist (e.g. jobs during construction).
   c. Provide all industry metrics on jobs per MW or jobs per site available for data center customer types in the Companies' possession.

27. Refer to Companies response to LJCMG-LFUCG-Q-33 which states, "See Case No. 2024-00326, responses to JI 2-16 and 2-25. The Companies have not executed any contracts for electric service with any data centers as of the date of this response. The Companies expect to execute service contracts with the customers prior to

electric services being rendered. Their execution will be contingent on the finalization of construction of facilities necessary to serve the customer and timing of the meter installation."

a. Do the Companies intend to execute contracts before or after CPCN approval? Please explain and state any specific details of contracts expected.
b. Do the Companies intend to execute contracts before or after construction of any new CC resources **<u>begins</u>**? Please explain and state any specific details of contracts expected.
c. Do the Companies intend to execute contracts before or after construction of any new BESS resources **<u>begins</u>**? Please explain and state any specific details of contracts expected.
d. Do the Companies intend to execute contracts before or after construction of any approved CC resources **<u>is completed</u>**? Please explain and state any specific details of contracts expected.
e. Do the Companies intend to execute contracts before or after construction of any approved BESS resources **<u>is completed</u>**? Please explain and state any specific details of contracts expected.
f. Do the Companies intend to execute contracts before or after installation of new meters at customer sites? Please explain and state any specific details of contracts expected.

28. Refer to the Companies' response to PSC 1-17.
    a. For the 402 MW Camp Ground Road data center project and the 600 MW Project Lincoln: OC Data Center, have the Companies been informed of the "well-known technology companies" the developers have been in talks with about use of the site?
    b. Have the Companies had any discussions with the potential owners of the data centers? Meaning the companies that will install and manage the server farms and the Camp Ground Road and Project Lincoln sites.
    c. Do the Companies plan on requiring the developer or facility tenants sign a contract for electric service or future special service contracts discussed in response to PSC 1-18?

29. Please describe the Companies' process for determining if announced load is likely.
    a. Has KU/LG&E verified land control and progressive site development status in its assessment of viability for prospective pipeline load and the Camp Ground / Lincoln customers? Please explain.
    b. Has KU/LG&E assessed the credit worthiness or balance sheet new load customers? Please explain what level of assessment has been conducted.

30. Please reference Tariff Filling ID TFS2025-00224, Rate DCP (Data Center Power) of East Kentucky Power Cooperative, Inc.
    a. Have the Companies considered only providing service once a data center enters into a contract that has been approved by the KPSC? Would this requirement also apply before beginning any necessary transmission upgrades?
    b. Have the Companies considered an energy demand and load factor threshold for datacenters to participate under the special service contracts referenced in PSC 1-18? If so, what energy demand and load factors are the Companies considering?
    c. Do the Companies plan on allowing data centers to use behind-the-meter or third-party energy sources? If so, how did the Companies account for these in its load forecast and economic development estimates?
    d. Have the Companies considered a "Dedicated Resource" for data centers which would be fully funded by costs recovered from a dedicated rate class or specific customers?

31. Refer to the response to KCA-1.4.
    a. When do the Companies expect to complete their analysis of Mill Creek 2?
    b. How will the Companies incorporate their analysis of reconsidering the Mill Creek 2 units in this proceeding?
    c. How would the action plan for the new BESS and CC resources change if Mill Creek 2 continues to operate passed the currently planned retirement date?
    d. Have the Companies performed any sensitivity analyses that reflect continued operation of Mill Creek 2 passed the currently planned retirement date? If so, please provide the results of those analyses, electronically, with all workpapers.

32. Refer to the Companies' response to KCA-1.4 which states the Companies are currently evaluating continue operation of Mill Creek 2 and the Companies response to LMG-LGUCG 1.30 which states that, "The Companies have no existing plans to accelerate the retirement of existing coal-fired generating facilities. The Companies would analyze and make such decisions holistically and in compliance with applicable law."
    a. Could deferred retirement at Mill Creek 2 defer or delay need for new generation? Please explain.
    b. Please explain what "holistically" means? Would the Companies need to assess alternative resource options in the evaluation? Please explain.
    c. Did the Companies include a deferred retirement analysis at Mill Creek 2 as part of their most recent IRP proceeding? If so, please provide a summary of the findings. If not, please explain why the Companies did not use the proceeding as a means of holistically evaluating a deferred retirement option.

33. Are there any environmental regulations in place that would require the Companies to limit generation at Mill Creek 3 and 4, Mill Creek 5 and Mill Creek 6?
    a. Please provide copies of all existing air permits and describe any limitations or conditions included for the existing Mill Creek site.
    b. Please explain if the Companies' Mill Creek plant is limited to any type of capacity factor limitations (NOx, SOx, PM, etc.). If so, please provide the limits, the reason for the limits, and documentation in the Company's possession regarding its plans to meet the limits. Explain if such limits are enforced annually or seasonally.
    c. Please explain if the Companies' Mill Creek plant is limited to any mass-based limitations (NOx, SOx, PM, etc.) for Mill Creek plant or unit operations. If so, please provide the limits, the reason for the limits, and documentation in the Companies' possession regarding its plans to meet the limits. Explain if such limits are enforced annually or seasonally.
    d. Please explain if the Companies' Mill Creek plant is limited to any hourly limitations (NOx, SOx, PM, etc.) for Mill Creek plant or unit operations. If so, please provide the limits, the reason for the limits, and documentation in the Company's possession regarding its plans to meet the limits. Explain if such limits are enforced annually or seasonally.
    e. Please confirm that proposed new build resources will be permitted to operate at full capacity in addition to existing resources. If not, please explain.
    f. Have the Companies begun the air permitting processes? Provide the status and existing permit documentation for the proposed resources.
    g. If there are environmental regulations that would limit full capacity at the site, how would the Companies address any peak demand concerns? Please explain.
    h. Would the Companies consider an earlier retirement date for Mill Creek 3 and 4 because of environmental limitations on the generating units that are currently in place? Please explain.

34. Please provide the Companies' summer and winter reserve margins used in its last five IRP filings. Please include the Case No. for each referenced IRP. Explain the methodology used in each IRP to derive the RM used in that IRP.

35. Refer to Case No. 2022-00402, Order at 177-78 (Ky. PSC Nov. 6, 2023). It appears that the Companies moved from an economic reserve margin to a 1-in10 LOLE reserve margin in the 2024 IRP based on the Commission's Order in 2022 CPCN and DSM case.
    a. Please explain what methodology and assumption changes have been made since 2022 study.

b. Compare and contrast the old methodology to the new methodology.

36. Please describe the drivers of the increase in reserve margin compared to the 2022 IRP reserve margin and the 2025 planning reserve margin.
    a. Please describe any impacts related to increased energy requirements and higher load factor load on the planning reserve margin.
    b. Please describe any studies performed to quantify the impacts of both shape and magnitude of the load forecast change.
    c. Please describe the impacts of weather normal load forecasting and load forecasts used in the evaluation for reserve margin.

37. Refer to the Companies response to AG-KIUC 1-15(b) and AG-KIUC 1-21.
    a. If the Companies plan reliability on a combined KU/LGE basis and the fact that reserve margins are carried for load changes due primarily to weather and unit availability risk, please explain any possible impacts related to reliability planning and costs.
    b. Do the Companies anticipate any reliability issues with anticipated large high-load factor load growth predominately in a single geographic area? Please explain if the risk of reliability events will increase or decrease with the addition of high-load factor load.
    c. Do the Companies anticipate operating reserve requirements will increase or decrease with the addition of high-load factor load? Please explain.

38. Refer to the Companies' Transmission Service Request Process.
    a. Please explain what a Transmission Service Request is, which parties determine the contents of such request, when the request is made, and the purpose of making a request.
    b. Please explain how the TSR is accepted and processed.
    c. Please explain the findings expected after conducting the associated study. Is the TSR intended to determine whether new load can be served by existing infrastructure or require new infrastructure? Please explain.
    d. Please explain how new infrastructure is paid for if a new project requires additional transmission system upgrades. Are the identified costs assigned to the customers or shared across the system?

39. How will the Companies evaluate the transmission system impact from multiple data centers located in specific counties?

a. Will the Companies analyze the TSRs incrementally as they come in or incorporate a cluster approach? Please explain.
b. How will costs associated with incremental TSRs incorporate results from ongoing facility interconnection processes and who will cover those costs? Please include who would be responsible for both the interconnection and system upgrade costs.

40. Refer to the Companies 3 pending Transmission Service Requests (TSR) (TSR LGE-2024-012, TSR LGE-2024-013, and TSR LGE-2024-014) totaling 1,252 MW and the Companies 1,750 MW of data center load included in the 2025 CPCN load forecast.
    a. When did the Companies assume the 1,750 MW of data center load included in the 2025 CPCN Load Forecast to be online?
    b. When did the Companies assume the 1,750 MW of data center load included in the 2025 CPCN Load Forecasts to have completed Transmission Service Requests?
    c. What is the projected earliest in-service date for the TSRs referenced above. Please reconcile the TSR assumption to the CPCN Load forecast assumption and explain any differences.
    d. For projects who have not yet completed a TSR, how did the Companies account for interconnection and system upgrades they may be needed to get the projects online? Please reconcile the assumptions to the CPCN load forecast assumption and explain any differences.