

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)	CASE NO. 2025-00045
CERTIFICATES OF PUBLIC CONVENIENCE)	
AND NECESSITY AND SITE COMPATIBILITY)	
CERTIFICATES)	

RESPONSE OF
KENTUCKY UTILITIES COMPANY
AND
LOUISVILLE GAS AND ELECTRIC COMPANY
TO
THE ATTORNEY GENERAL AND KENTUCKY INDUSTRIAL UTILITY
CUSTOMERS' POST HEARING DATA REQUESTS
DATED AUGUST 13, 2025

FILED: AUGUST 22, 2025

VERIFICATION

COMMONWEALTH OF KENTUCKY)
)
COUNTY OF JEFFERSON)

The undersigned, **Lonnie E. Bellar**, being duly sworn, deposes and says that he is Executive Vice President of Engineering, Construction and Generation for PPL Services Corporation and he provides services to Louisville Gas and Electric Company and Kentucky Utilities Company, that he has personal knowledge of the matters set forth in the responses for which he is identified as the witness, and the answers contained therein are true and correct to the best of his information, knowledge and belief.



Lonnie E. Bellar

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 20th day of August 2025.

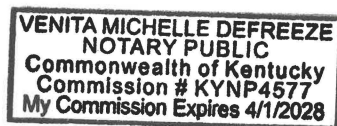


Notary Public

Notary Public ID No. KYNP4577

My Commission Expires:


April 1, 2028



VERIFICATION

COMMONWEALTH OF KENTUCKY)
)
COUNTY OF JEFFERSON)

The undersigned, **John Bevington**, being duly sworn, deposes and says that he is Senior Director – Business and Economic Development for PPL Services Corporation and he provides services to Louisville Gas and Electric Company and Kentucky Utilities Company, that he has personal knowledge of the matters set forth in the responses for which he is identified as the witness, and the answers contained therein are true and correct to the best of his information, knowledge, and belief.



John Bevington

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 19th day of August 2025.



Notary Public


Notary Public ID No. KYNP 4577

My Commission Expires:

April 1, 2028

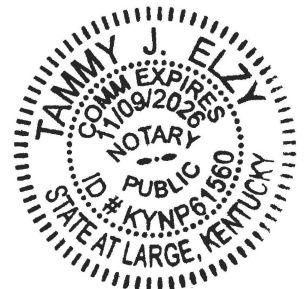


COMMONWEALTH OF KENTUCKY)
)
COUNTY OF JEFFERSON)


Robert M. Conroy

Sammy J. Ely
Notary Public

November 9, 2026



VERIFICATION

COMMONWEALTH OF KENTUCKY)
)
COUNTY OF JEFFERSON)

The undersigned, **Tim A. Jones**, being duly sworn, deposes and says that he is Senior Manager – Sales Analysis and Forecasting for LG&E and KU Services Company, that he has personal knowledge of the matters set forth in the responses for which he is identified as the witness, and the answers contained therein are true and correct to the best of his information, knowledge, and belief.



Tim A. Jones

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 21st day of August 2025.

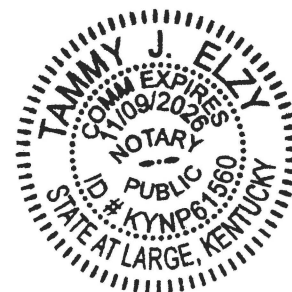


Notary Public

Notary Public ID No. KYNP61560

My Commission Expires:

November 9, 2026



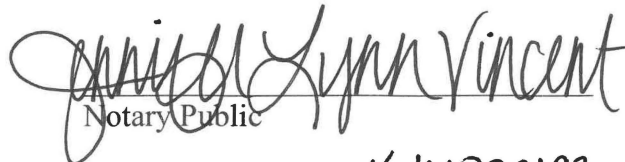
VERIFICATION

COMMONWEALTH OF KENTUCKY)
)
COUNTY OF JEFFERSON)

The undersigned, **Charles R. Schram**, being duly sworn, deposes and says that he is Vice President –Energy Supply and Analysis for Kentucky Utilities Company and Louisville Gas and Electric Company and is an employee of LG&E and KU Services Company, that he has personal knowledge of the matters set forth in the responses for which he is identified as the witness, and the answers contained therein are true and correct to the best of his information, knowledge, and belief.


Charles R. Schram

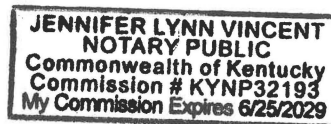
Subscribed and sworn to before me, a Notary Public in and before said County and State this 20th day of August 2025.


Notary Public

Notary Public ID No. KYNP32193

My Commission Expires:

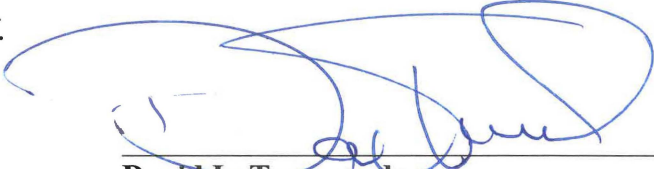
06-25-2029



VERIFICATION

COMMONWEALTH OF KENTUCKY)
)
COUNTY OF JEFFERSON)

The undersigned, **David L. Tummonds**, being duly sworn, deposes and says that he is Vice President - Generation for Kentucky Utilities Company and Louisville Gas and Electric Company and an employee of LG&E and KU Services Company, that he has personal knowledge of the matters set forth in the responses for which he is identified as the witness, and the answers contained therein are true and correct to the best of his information, knowledge, and belief.



David L. Tummonds

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 20th day of August 2025.



Notary Public


Notary Public, ID No. KYNP 4577


My Commission Expires:

April 1, 2028

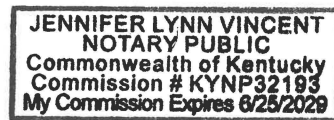


COMMONWEALTH OF KENTUCKY)
)
COUNTY OF JEFFERSON)


Stuart A. Wilson


 Notary Public
 Notary Public ID No. KYNP32193

06-25-2029



**KENTUCKY UTILITIES COMPANY
AND
LOUISVILLE GAS AND ELECTRIC COMPANY**

**Response to Attorney General and Kentucky Industrial Utility Customers’
Post Hearing Data Requests
Dated August 13, 2025**

Case No. 2025-00045

Question No. 1

Responding Witness: David L. Tummonds

Q-1. Provide any updates to the Mill Creek 2 life extension costs.

A-1. The Companies have focused on continued operation of Mill Creek 2 through mid-2031, which will avoid the substantial costs associated with SCR installation, incremental transmission costs, and other notable life-extension costs beyond 2031 operation. The table below notes costs to reliably operate Mill Creek 2 through that the anticipated 2031 in-service date of Mill Creek 6. Note that the total expected stay-open costs are now about \$9 million lower than the \$72 million previously anticipated in the Companies’ Mill Creek 2 life extension analysis provided as the attachment to PSC 3-8(b).

(\$000’s)	2025	2026	2027	2028	2029	2030	2031
Non-Labor	\$3,846	\$10,176	\$5,698	\$3,552	\$3,933	\$3,408	\$1,296
Labor	\$655	\$507	\$1,201	\$784	\$997	\$828	\$416
Capital	\$3,287	\$7,379	\$9,074	\$2,961	\$2,022	\$692	-
Total.	\$7,789	\$18,062	\$15,973	\$7,296	\$6,952	\$4,927	\$1,712

**KENTUCKY UTILITIES COMPANY
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Question No. 2

Responding Witness: Robert M. Conroy

Q-2. State what review or reporting requirements would be appropriate for proposed adjustment clauses MC2 and MC6.

A-2. The Companies would work with Commission Staff on the monthly reporting forms associated with Adjustment Clause MC2, if approved, as soon as practical after the Order in this proceeding. The Companies expect that the reporting forms would be similar to the ECR mechanism. Filings supporting the billing factors would be made at the same time as the FAC and ECR monthly filings and would be billed on a two-month lag after the expense month (e.g., the Companies would bill a January expense month in March).

With regard to Adjustment Clause MC6, the Companies will work with Commission Staff on the monthly reporting forms, if approved, in the year prior to the in-service date of Mill Creek 6. The Adjustment Clause MC6 would function in the same manner as Adjustment Clause MC2 regarding the filing and billing timing.

The Companies believe Commission-initiated annual reviews of the operation of each mechanism would be appropriate to allow the Commission to determine the prudence of the costs recovered through the mechanisms.

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Case No. 2025-00045

Question No. 3

Responding Witness: John Bevington / Tim A. Jones

- Q-3. Provide an update on economic development in the Companies' service territories.
- A-3. Economic development in the Companies' service territory is as active and successful as ever. In just a week and a half this month, Governor Beshear announced or celebrated investments from the private sector in the Companies' service territories totaling over \$6.3 billion along with the creation of more than 1,000 jobs.¹ Corning, Ford, GE Appliances, and General Matter all made commitments this summer that will continue to shape our economy for decades to come and will deliver high tech and innovative products.² These projects are in addition to other previous major project announcements, which projects are

¹ Team Kentucky, "Gov. Beshear Highlights 10-Day Economic Win Streak With Over \$6.3 Billion Invested and More Than 1,000 Jobs," New Kentucky Home (Aug. 20, 2025) ("Today, Gov. Andy Beshear highlighted an economic win streak for Kentucky, with more than \$6.3 billion in new investment and over 1,000 full-time jobs announced by four iconic companies in less than two weeks."), available at https://newkentuckyhome.ky.gov/Newsroom/NewsPage/20250820_EconomicMomentum (accessed Aug. 21, 2025).

² Apple, "Apple and Corning Partner to Manufacture 100 Percent of iPhone and Apple Watch Cover Glass in Kentucky" (Aug. 6, 2025), available at <https://www.apple.com/newsroom/2025/08/apple-corning-to-manufacture-all-iphone-apple-watch-cover-glass-in-kentucky/> (accessed Aug. 21, 2025); Scottie Ellis, "Gov. Beshear Joins Ford Motor Co. to Announce Kentucky's Third-Largest Economic Development Project on Record," Office of the Governor (Aug. 11, 2025), available at <https://www.kentucky.gov/Pages/Activity-stream.aspx?n=GovernorBeshear&prId=2555> (accessed Aug. 21, 2025); Ford, "Ford's \$5B Bet on America: Innovation Meets Efficiency in New EV Platform, Assembly Process and Midsize Truck," Ford from the Road (Aug. 11, 2025), available at <https://www.fromtheroad.ford.com/us/en/articles/2025/ford-affordable-electric-vehicle-platform-midsize-electric-truck> (accessed Aug. 21, 2025); GE Appliances, "GE Appliances Doubles Down on U.S. Manufacturing with \$490 Million Laundry Plant Investment at its Global Headquarters in Louisville, Kentucky," (June 26, 2025), available at <https://pressroom.geappliances.com/news/ge-appliances-doubles-down-on-u-s-manufacturing-with-490-million-laundry-plant-investment-at-its-global-headquarters-in-louisville-kentucky> (accessed Aug. 21, 2025); Team Kentucky, "Gov. Beshear Joins General Matter To Celebrate Milestone for \$1.5 Billion Uranium Enrichment Facility in Paducah, Set To Create 140 Full-Time Jobs," New Kentucky Home (Aug. 5, 2025), available at https://newkentuckyhome.ky.gov/Newsroom/NewsPage/20250805_GeneralMatter (accessed Aug. 21, 2025).

underway and causing additional positive ripple effects in the Kentucky economy. For example, Toyota's commitment to build a new battery electric vehicle in 2024 was followed by an additional announcement to construct a new paint line in Georgetown and further support vehicle electrification efforts.³ Both projects will pour more than \$2 billion into the flagship manufacturing facility.

In the healthcare arena, the University of Kentucky broke ground on the new UK Cancer and Advanced Ambulatory Building in April 2024.⁴ The 550,000 square-foot facility will be the new home to the UK Markey Cancer Center. This June, Norton Healthcare announced its intention to build a new pediatric hospital as part of a 156-acre pediatric care campus in Jefferson County, which Governor Beshear indicated could attract over \$1 billion in investment and create 1,000 jobs.⁵

At the end of July 2025, the Department of Energy announced that the Paducah Gaseous Diffusion Plant was selected as one of four finalist sites to host AI Data Center and Energy Infrastructure projects as part of the Trump Administration's strategy to accelerate the development of AI Infrastructure.⁶ This announcement signals Kentucky's trajectory in the data center realm but also could directly involve KU's service territory, which encompasses the site. Collaborative discussions are ongoing with other utility companies in the area about service provision and how to enable growth in and around the DOE site.

³ Toyota, "A Fresh Coat: Toyota Kentucky Invests \$922 Million to Build Advanced Paint Facility" (Dec. 12, 2024) ("Transformation continues at Toyota Kentucky with a \$922 million investment to build a new advanced paint facility and further support electrification efforts. ... Scheduled to open in 2027, the facility will add 1 million square-feet of capacity while decreasing carbon emissions by 30 percent and water usage by 1.5 million gallons per year. ... This news follows a \$1.3 billion investment announced earlier this year at the Georgetown site to bring assembly of an all-new, three-row battery electric SUV to the U.S. market in 2026. Toyota's investment in Kentucky reaches more than \$11 billion since breaking ground in 1986, underscoring the automaker's promise of stable employment."), available at <https://pressroom.toyota.com/a-fresh-coat-toyota-kentucky-invests-922-million-to-build-advanced-paint-facility/> (accessed Aug. 21, 2025).

⁴ Allison Perry and Elizabeth Chapin, "UK breaks ground on new Cancer and Advanced Ambulatory Building," UKNOW (Apr. 25, 2024), available at <https://uknow.uky.edu/uk-healthcare/uk-breaks-ground-new-cancer-and-advanced-ambulatory-building-0> (accessed Aug. 21, 2025).

⁵ Matthew Glowicki, "Norton Children's to build new full-service pediatric hospital in Louisville. What to know," Louisville Courier-Journal (June 11, 2025) ("Kentucky Gov. Andy Beshear said Wednesday that the project would draw 'well over' \$1 billion in investment across the campus and support 1,000 on-site workers."), available at <https://www.courier-journal.com/story/news/local/2025/06/11/norton-childrens-to-build-full-service-pediatric-hospital-louisville/84119417007/> (accessed Aug. 21, 2025).

⁶ U.S. Dept. of Energy, "DOE Announces Site Selection for AI Data Center and Energy Infrastructure Development on Federal Lands" (July 24, 2025) ("The U.S. Department of Energy (DOE) today announced the next steps in the Trump administration's plan to accelerate the development of AI infrastructure through siting on DOE lands. DOE has selected four sites—Idaho National Laboratory, Oak Ridge Reservation, Paducah Gaseous Diffusion Plant and Savannah River Site—to move forward with plans to invite private sector partners to develop cutting edge AI data center and energy generation projects."), available at <https://www.energy.gov/articles/doe-announces-site-selection-ai-data-center-and-energy-infrastructure-development-federal> (accessed Aug. 21, 2025).

Importantly major announcements like these happen quickly, and without warning or the convenience of having years to prepare for them. Not including the Paducah opportunities, the other projects noted will likely combine for nearly 100 MW of capacity need and will come online within a few short years.

The pipeline of opportunities also remains extremely strong. See the supplemental response to PSC 2-17(g) that the Companies filed on August 13, 2025. The Companies' pipeline includes 179 opportunities totaling almost 9 GW of new and/or expanding load. Of those in the pipeline, 21 opportunities totaling an estimated 6.7 GW are associated with data centers and 42 opportunities totaling almost 1.9 GW is for other economic development projects. The pipeline is reflective of a continuously updated list of projects including the removal of inactive projects and the entry of new ones. Activity and interest have not slowed down.⁷

Based upon the pipeline as of August 13, 2025, see also the attachment being provided in a separate file. Certain information requested is confidential and proprietary and is being provided under seal pursuant to a petition for confidential protection. The expected value calculation for data center load has increased by almost 700 MW. The expected value of non-data center load remains above 550 MW, and certain projects discussed above that were announced this month have yet to be included in these figures. Overall economic development activity continues to support the need for the resources provided by the stipulation.

⁷ The Companies also note that commercial production of batteries began at the BlueOval SK Battery Park on August 19, 2025. BlueOval SK, "BlueOval SK Launches Battery Production at First Kentucky Plant" (Aug. 19, 2025), available at <https://static1.squarespace.com/static/64d1333428e7832185351ab8/t/68a48cf72d02ba1510997680/1755614455374/BlueOval+SK+Launches+Battery+Production+at+First+Kentucky+Plant.pdf> (accessed Aug. 21, 2025).

**KENTUCKY UTILITIES COMPANY
AND
LOUISVILLE GAS AND ELECTRIC COMPANY**

**Response to Attorney General and Kentucky Industrial Utility Customers' Post
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Case No. 2025-00045

Question No. 4

Responding Witness: Lonnie E. Bellar / Charles R. Schram / Stuart A. Wilson

Q-4. Discuss the ability of the Companies to serve existing and new load with the resources recommended in the Stipulation.

A-4. See the response to PSC PHDR-4. Highlighting the need for the resources recommended in the Stipulation, outside the Companies' service territory, both MISO and PJM continue to have resource adequacy challenges. MISO's April 2025 capacity action cleared as high as \$666/MW-day for the summer season. About 90 percent of MISO's generation is owned by vertically integrated utilities with state regulatory oversight.⁸ Still, NERC believes MISO faces an elevated reliability risk that shifts to a high risk in the 2028-2031 timeframe.⁹

PJM's recent capacity auction for 2026-2027 cleared at the price cap of \$329/MW-day (UCAP basis). This is below a simulated clearing price of \$389/MW-day without a cap and below PJM's cost of new entry ("CONE"), calculated at \$462/MW-day on a gross CONE basis, which is likely lagging the current environment of escalating generation equipment prices. PJM continues to look for ways its market design can incentivize new generation, but thus far the changes do not appear to sufficiently support long-term certainty for generation investment return and cost recovery. Furthermore, there is no guarantee that any level of higher capacity prices in a single auction will not return to marginal costs in subsequent auctions, reducing the prospects for new generation investment that depends on reasonable economics to obtain financing. Given these conditions, and with 60 percent of PJM's fossil generation owned by merchant entities due to the unbundled nature of many PJM states' vertically integrated utilities, resource adequacy will likely remain uncertain in the face of retirements and growing load.

⁸<https://cdn.misoenergy.org/Transmission%20Owners%20Sector%20Membership%20and%20Participation%20Guidelines530292.pdf>, page 1.

⁹ <https://www.nerc.com/news/Pages/Statement-on-NERC%E2%80%99s-2024-Long-Term-Reliability-Assessment.aspx>, June 17, 2025.

**KENTUCKY UTILITIES COMPANY
AND
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Question No. 5

Responding Witness: Robert M. Conroy

Q-5. Describe how the Companies communicate to their customers concerning projects like those proposed in this case.

A-5. LG&E and KU use a comprehensive customer education communications approach to ensure customers are aware of the infrastructure investments the Companies are making to reliably serve them and how those investments benefit them. This approach uses clear and consistent messaging across:

- **Website** – A dedicated and updated landing page (lge-ku.com/investments) that provides an overview of the types of system investments the Companies are undertaking, the customer benefits they deliver, and supporting visuals and FAQs. In addition, a specific page (lge-ku.com/powering-kentuckys-growth-together) addresses the Companies' proposed generation investments and information on data center economic development.
- **Customer newsletter** – Frequent stories in both print and electronic versions, with stories highlighting projects and customer benefits.
- **E-blasts** – Regular email communications to keep customers informed about system investments and the role they play in maintaining safe, reliable, and affordable service.
- **Social media** – Regular posts across the Companies' platforms to share infrastructure investments in an engaging, shareable format.
- **Sponsored content and paid media** – Articles, digital ads, and news partnerships to extend the Companies' reach beyond owned channels and connect with broader audiences.
- **Media relations and earned media** – Ongoing engagement with reporters, including interviews, background briefings, and responses to inquiries, to help generate accurate, balanced coverage of proposed investments and their value to the Companies' customers.

By using this multi-channel strategy, the Companies ensure consistent, accessible information is available to customers, whether they prefer to receive updates in

print, online, via email, through social media, or from trusted news sources. This approach also allows the Companies to reinforce key messages over time and provide updates as projects progress.

In addition to the above, the Companies attend all Commission scheduled public comment meetings in any proceeding involving the Companies. At those meetings, the Companies' personnel from Customer Service, Communication, Regulatory, and Legal listen to public comments regarding the specific proceeding. Customer Service personnel are available to address any specific billing or service issues raised by the public, and Communication personnel are available to address any media questions.