

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

**In the Matter of:**

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

**RESPONSE OF**  
**KENTUCKY UTILITIES COMPANY**  
**AND**  
**LOUISVILLE GAS AND ELECTRIC COMPANY**  
**TO**  
**THE JOINT INTERVENORS KENTUCKIANS FOR THE COMMONWEALTH,**  
**KENTUCKY SOLAR ENERGY SOCIETY, METROPOLITAN HOUSING**  
**COALITION, AND MOUNTAIN ASSOCIATION'S POST HEARING**  
**REQUESTS FOR INFORMATION**  
**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**

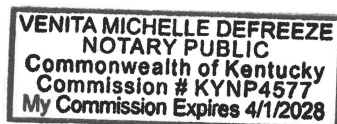
Subscribed and sworn to before me, a Notary Public in and before said County and State, this 20<sup>th</sup> day of August 2025.

  
\_\_\_\_\_  
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 19<sup>th</sup> day of August 2025.

  
Notary Public

Notary Public ID No. KYNP 4577

My Commission Expires:

April 1, 2028




# VERIFICATION

COMMONWEALTH OF KENTUCKY )  
 )  
COUNTY OF JEFFERSON )

The undersigned, **Robert M. Conroy**, being duly sworn, deposes and says that he is Vice President, State Regulation and Rates, 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.

  
Robert M. Conroy

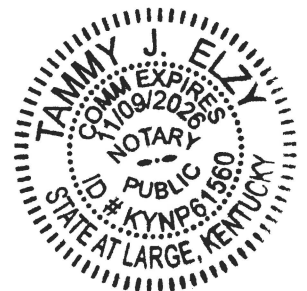
Subscribed and sworn to before me, a Notary Public in and before said County and State, this 20<sup>th</sup> day of August 2025.

  
Notary Public

Notary Public ID No. KYNP61560

My Commission Expires:

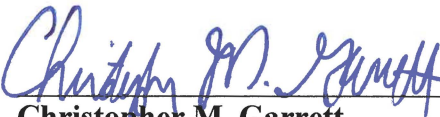
November 9, 2026




## VERIFICATION

COMMONWEALTH OF KENTUCKY )  
)  
COUNTY OF JEFFERSON )

The undersigned, **Christopher M. Garrett**, being duly sworn, deposes and says that he is Vice President – Financial Strategy & Chief Risk Officer for PPL Services Corporation and he provides services to Kentucky Utilities Company and Louisville Gas and Electric 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.

  
Christopher M. Garrett

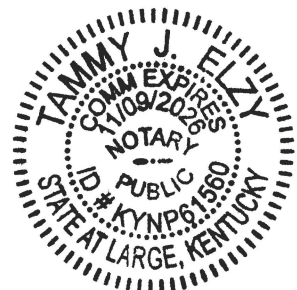
Subscribed and sworn to before me, a Notary Public in and before said County and State, this 20<sup>th</sup> day of August 2025.

  
Notary Public

Notary Public ID No. KYNP61560

My Commission Expires:

November 9, 2026



**VERIFICATION**

**COMMONWEALTH OF KENTUCKY** )  
 )  
**COUNTY OF JEFFERSON** )

The undersigned, **Lana Isaacson**, being duly sworn, deposes and says that she is Manager – Energy Efficiency Programs for LG&E and KU Services Company, that she has personal knowledge of the matters set forth in the responses for which she is identified as the witness, and the answers contained therein are true and correct to the best of her information, knowledge, and belief.

  
\_\_\_\_\_  
**Lana Isaacson**

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

  
\_\_\_\_\_  
Notary Public

Notary Public ID No. KYNP 4577

My Commission Expires:

April 1, 2028



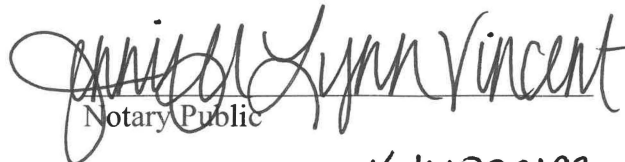
**VERIFICATION**

**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

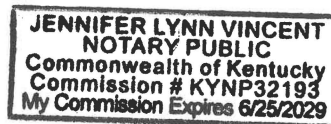
Subscribed and sworn to before me, a Notary Public in and before said County and State this 20th day of August 2025.

  
Notary Public


Notary Public ID No. KYNP32193

My Commission Expires:

06-25-2029



**COMMONWEALTH OF KENTUCKY )**  
**)**  
**COUNTY OF JEFFERSON )**

  
David L. Tummonds

*Krist Michelle D. Flege*  
Notary Public

April 1, 2028





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

**Response to Joint Intervenors Kentuckians for the Commonwealth, Kentucky Solar  
Energy Society, Metropolitan Housing Coalition, and Mountain Association's Post  
Hearing Request for Information  
Dated August 13, 2025**

**Case No. 2025-00045**

**Question No. 1**

**Responding Witness: John Bevington**

Q-1. Please refer to the August 6, 2025 Hearing Video Transcript ("HVT") at approximately 10:51-10:53 and produce the most recent version of the Companies' list of economic development loads, including inactive projects (e.g. "lost" opportunities or other projects not brought to fruition as referenced by Mr. Bevington, as well as any completed or contracted projects). To the extent available, include the following information:

- a. Stage in the economic development pipeline;
- b. Expected size (in kW or MW);
- c. Location;
- d. Name;
- e. Type of project;
- f. Whether the developer has submitted Transmission Service Request ("TSR"),
- g. and the stage of the TSR;
- h. Whether the developer has signed an Engineering Letter of Authorization;
- i. Whether the developer or another entity has signed a Contract(s) for Electric Service for the project.

A-1.

- a-e. See the confidential attachment as a response to this request, which is consistent with the supplemental response to PSC 2-17(g) filed on August 13, 2025, but which now includes all projects that have been both active at

some point in 2025 *and* were marked as inactive (lost or stopped) at some point in 2025. Certain information requested is confidential and proprietary and is being provided under seal pursuant to a petition for confidential protection. See also the responses to AG-KIUC PH-3 and PSC PH-21.

- f-g. See the response to the AG-KIUC 1-45, SC 2-17, and SC 2-18. The list of TSRs and their stages in the study queue are publicly tracked and available on OATI OASIS: [TSR NITS Posting.pdf \(oati.com\)](#).

Further, the Companies are in the midst of filing two TSRs (Opportunity IDs 4478 and 4479 in the August 13, 2025, supplemental response to PSC 2-17(g)) which do not yet have assigned TSR numbers. It is anticipated that the applications will be submitted to the ITO and TSR numbers assigned in the next two weeks.

- h. See the response to JI 1.5(b).
- i. No developer or other entity has signed a contract for electric service.

**KENTUCKY UTILITIES COMPANY  
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Dated August 13, 2025**

**Case No. 2025-00045**

**Question No. 2**

**Responding Witness: Lonnie E. Bellar**

- Q-2. Please refer to the August 6, 2025 HVT at approximately 4:32 PM and produce the Transitional Cluster Study that was completed on July 18, 2025, along with all supporting workpapers, inputs, outputs, and assumptions.
- A-2. See attachment being provided in a separate file. The information requested is confidential and proprietary and is being provided under seal pursuant to a petition for confidential protection.

**KENTUCKY UTILITIES COMPANY  
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**Response to Joint Intervenor Kentuckians for the Commonwealth, Kentucky Solar  
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Dated August 13, 2025**

**Case No. 2025-00045**

**Question No. 3**

**Responding Witness: Charles R. Schram**

Q-3. Please refer to the August 6, 2025 HVT at approximately 4:15 PM to 4:19 PM and answer the following requests.

- a. Please produce the Confidentiality Agreement that the Companies have entered into regarding the Borealis Project.
- b. Please refer to Sierra Club request 1.38(a) and produce all communications that the Companies have had with Texas Gas Transmission, Texas Eastern, and/or Tennessee Gas regarding firm transportation service for Brown 12 and Mill Creek 6 that have not already been produced, including all communications with Texas Gas Transmission that have occurred since the Companies entered into a Confidentiality Agreement regarding the Borealis Project.
- c. Please identify in the record the Companies' assumed gas transportation cost for Mill Creek 6.

A-3.

- a. See attachment being provided in a separate file. The information requested is confidential and proprietary and is being provided under seal pursuant to a petition for confidential protection.
- b. The communications are being provided in a separate attachment. Certain information requested is confidential and proprietary and is being provided under seal pursuant to a petition for confidential protection.
- c. See the responses to JI 1-71 and JI 2-19. The gas transportation costs for Mill Creek 6 are based on indicative pricing received from Texas Gas Transmission in January 2025. However, no term sheet with firm pricing has been provided.

**KENTUCKY UTILITIES COMPANY  
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**Response to Joint Intervenors Kentuckians for the Commonwealth, Kentucky Solar  
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Dated August 13, 2025**

**Case No. 2025-00045**

**Question No. 4**

**Responding Witness: Charles R. Schram**

**Q-4.** Please refer to Attachment 1 produced in response to Sierra Club request 1.38(a) and answer the following requests.

- a. Please produce the draft termsheet referenced on Page 1 of Attachment 1 and explain to what extent that termsheet has been incorporated into the Companies' assumed gas transportation cost for Brown 12.
- b. If the Companies completed the Service Request Form identified in Pages 7-8 of Attachment 1, please produce the completed Service Request Form.
- c. If the Companies completed the Confidentiality Agreement identified in Pages 9-14 of Attachment 1, please produce the completed Confidentiality Agreement.
- d. Please explain the status of any bidding from the Companies pertaining to the Mississippi Crossing Project.
- e. To the extent that any communications pertaining to the Mississippi Cross Project exist that have not otherwise been produced, please produce those communications.
- f. Please identify in the record the Companies' assumed gas transportation cost for Brown 12.

**A-4.**

- a. The referenced term sheet is being provided in a separate file. The service quoted in the term sheet from September 2023 was no longer available as of September 2024. Therefore, the transport cost for Brown 12 is based on available transport service identified as "Station 87."

- b. The Companies did not complete the Service Request Form related to the Mississippi Crossing project.
- c. The Companies did not complete a Confidentiality Agreement related to the Mississippi Crossing project.
- d. The Companies did not participate in “bidding” related to the Tennessee Gas Pipeline’s (“TGP”) Mississippi Crossing Project. Information related to this project was provided by the Companies in response to SC 1-38(a). TGP issued a binding Open Season seeking customers to participate in the project. The Companies did not participate and do not make commitments to procure gas transport until the Commission approves construction of the applicable generating unit.
- e. See the response to part (d).
- f. See the response to JI 1-71.

**KENTUCKY UTILITIES COMPANY  
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Dated August 13, 2025**

**Case No. 2025-00045**

**Question No. 5**

**Responding Witness: Lonnie E. Bellar / David L. Tummonds**

Q-5. Please refer to the August 7, 2025 HVT at approximately 9:14-9:18 AM and provide the following:

- a. The Independent Transmission Organization ("ITO") analysis of system and network upgrades referenced in response to Joint Intervenors request 1.25(a). If no such analysis is yet complete, provide the anticipated date of completion.
- b. Any analysis completed by either the Companies or the ITO analyzing electric transmission needs to keep Mill Creek 2 in-service beyond 2027.
- c. Any analysis completed by either the Companies or the ITO analyzing additional electric transmission costs that would result from extending the life of Mill Creek 2 beyond 2027.

A-5.

- a. The 2024 Transitional Cluster Study Final Report was completed on July 18, 2025 and is available from the ITO. The Executive Summary is available on OASIS at [https://www.oasis.oati.com/woa/docs/LGEE/LGEEdocs/LGE-TCS-2024\\_Final\\_Report\\_Executive\\_Summary.pdf](https://www.oasis.oati.com/woa/docs/LGEE/LGEEdocs/LGE-TCS-2024_Final_Report_Executive_Summary.pdf). PJM is completing an Affected System Study that includes Brown 12, and that study will not be complete until later this year. The ITO has completed no analysis for Mill Creek 6 or the Cane Run BESS as the interconnection request will be submitted in November of 2025 consistent with the Companies' response to JI 1-76. The Companies anticipate the result of the next interconnection request cluster study will be available the middle of 2026.
- b. See attachment being provided in a separate file. The information requested is confidential and proprietary and is being provided under seal pursuant to a petition for confidential protection.

- c. See the response to part (b).



**KENTUCKY UTILITIES COMPANY  
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Dated August 13, 2025**

**Case No. 2025-00045**

**Question No. 6**

**Responding Witness: Lonnie E. Bellar / David L. Tummonds**

Q-6. Please refer to the August 7, 2025 HVT at approximately 9:24-9:26 AM and provide the following:

- a. Please explain what transmission upgrades would be necessary to keep Mill Creek 2 in-service past 2027 (assuming Mill Creek 5 is online and Mill Creek 3 & 4 remain online), including an estimate of costs for such upgrades.
- b. Please explain what transmission upgrades would be necessary to keep Mill Creek 2 in-service past 2031 (assuming both Mill Creek 5 and Mill Creek 6 are online and Mill Creek 3 & 4 remain online), including an estimate of costs for such upgrades.

A-6.

- a. No transmission upgrades are expected to be necessary to keep Mill Creek 2 in-service from 2027 until 2031 (assuming Mill Creek 5 is online and Mill Creek 3 & 4 remain online).
- b. See the response to Question No. 5 part (b).

**KENTUCKY UTILITIES COMPANY  
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**Response to Joint Intervenor Kentuckians for the Commonwealth, Kentucky Solar  
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Hearing Request for Information  
Dated August 13, 2025**

**Case No. 2025-00045**

**Question No. 7**

**Responding Witness: Lonnie E. Bellar / David L. Tummonds**

Q-7. Please refer to the August 7, 2025 HVT at approximately 9:26 AM and provide the following:

- a. The current amount (MW) of interconnection rights at the Mill Creek site.
- b. Please explain whether the Companies have sufficient interconnection rights to accommodate Mill Creek 5 in a scenario where Mill Creek 2 remains in-service beyond 2027 and Mill Creek 3 & 4 remain online.
- c. Please explain whether the Companies have sufficient interconnection rights to accommodate Mill Creek 6 in a scenario where Mill Creek 2 remains in-service beyond 2031 and Mill Creek 3 & 4 remain online.

A-7.

- a. The Generator Interconnection Capacity of the existing generators at the Mill Creek plant are listed below:
  - Mill Creek 2: 308 MW
  - Mill Creek 3: 397 MW
  - Mill Creek 4: 492 MW
- b. Interconnection rights for Mill Creek 5 will be granted through the Generator Interconnection process outlined in the Companies' OATT. Mill Creek 5 is currently in that process but will not have full interconnection rights until an LGIA is signed for that unit.
- c. Interconnection rights for Mill Creek 6 will be granted through the Generator Interconnection process outlined in the Companies' OATT. Mill Creek 6 will begin that process in November 2025 but will not have full interconnection rights until an LGIA is signed for that unit.

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

**Response to Joint Intervenors Kentuckians for the Commonwealth, Kentucky Solar  
Energy Society, Metropolitan Housing Coalition, and Mountain Association's Post  
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Dated August 13, 2025**

**Case No. 2025-00045**

**Question No. 8**

**Responding Witness: Lonnie E. Bellar / David L. Tummonds**

- Q-8. Please refer to the August 7, 2025 HVT at approximately 9:28-9:30 AM and provide the Companies' best estimate of total electric transmission costs for each NGCC facility, including both transformer costs and network upgrade costs.
- A-8. Brown 12: The Companies estimate \$43 million total electric transmission costs.
- Mill Creek 5: The Companies estimate \$29 million total electric transmission costs.
- Mill Creek 6: See scenarios 1-3 in the "Transmission Power Flow Study for Continued Operation of MC2" workpaper referenced in response to Question No. 5.

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

**Response to Joint Intervenors Kentuckians for the Commonwealth, Kentucky Solar Energy Society, Metropolitan Housing Coalition, and Mountain Association's Post Hearing Request for Information  
Dated August 13, 2025**

**Case No. 2025-00045**

**Question No. 9**

**Responding Witness: Lana Isaacson**

Q-9. Please refer to the August 7, 2025 HVT at approximately 11:11-11:13 AM and list DSM Advisory Group participants (e.g., the Office of the Attorney General, Kentuckians for the Commonwealth, Wal-Mart). Note: This request does not seek identification of particular individuals that participated in meetings.

A-9. **Participants from June 3, 2024, Meetings:**

Apogee Climate / Kentucky Solar Energy Society  
Coalition for the Homeless  
Goodwill Industries / Wellspring  
Greater Louisville Sierra Club  
Kentuckians for the Commonwealth  
Kentucky Conservation Committee  
Kentucky Energy and Environment Cabinet / Office of Energy Policy  
Kentucky Housing Corporation (KHC)  
Kentucky Resources Council  
Lexington Fayette Urban County Government (LFUCG)  
Louisville Climate Action Network  
Louisville Metro Government / Mayor's Office  
Metropolitan Housing Coalition  
Mountain Association  
NAACP  
Office of the Attorney General (OAG)  
TRC  
Virtual Peaker  
Wal-Mart  
LG&E / KU

**Participants from July 16, 2024, Meetings:**

Apogee Climate / Kentucky Solar Energy Society  
Bluegrass Greensource  
Greater Louisville Sierra Club  
Kentuckians for the Commonwealth  
Kentucky Conservation Committee  
Kentucky Energy and Environment Cabinet / Office of Energy Policy  
Kentucky Housing Corporation (KHC)  
Kentucky Industrial Utility Customers (KIUC)  
Louisville Climate Action Network  
Louisville Metro Government / Mayor's Office  
Louisville Sustainability Council  
Metropolitan Housing Coalition  
Mountain Association  
NAACP  
Office of the Attorney General (OAG)  
Oracle  
TRC  
Virtual Peaker  
LG&E / KU

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

**Response to Joint Intervenor Kentuckians for the Commonwealth, Kentucky Solar  
Energy Society, Metropolitan Housing Coalition, and Mountain Association's Post  
Hearing Request for Information  
Dated August 13, 2025**

**Case No. 2025-00045**

**Question No. 10**

**Responding Witness: Lana Isaacson**

Q-10. Please refer to the August 7, 2025 HVT at approximately 11:18-11:26 AM, and answer the following requests.

- a. Identify and produce electronic messages related to the Friday, August 2, 2024, and Wednesday, August 7, 2024 emails from Sarah Pierce, Metropolitan Housing Coalition, to John Hayden, LG&E/KU Energy, LLC, displayed at hearing and attached hereto as an Attachment. A related message includes but is not limited to responses directly to Ms. Pierce. For example, any forwarding of the identified messages and subsequent messages among the Companies' DSM Team or other employees discussing Ms. Pierce's communications. Please produce responsive record in native file format with metadata intact. Note: If any such document was but is no longer in the Company's possession or subject to its control, state what disposition was made of it and why it was so disposed.
- b. Please identify and produce any policy or written explanation of process for a DSM Advisory Group participant to request a meeting, if any.

A-10.

- a. See attachment being provided in a separate file.
- b. The Companies do not have any policies or written procedures related to DSM Advisory Group meeting requests.

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

**Response to Joint Intervenors Kentuckians for the Commonwealth, Kentucky Solar  
Energy Society, Metropolitan Housing Coalition, and Mountain Association's Post  
Hearing Request for Information  
Dated August 13, 2025**

**Case No. 2025-00045**

**Question No. 11**

**Responding Witness: Lonnie E. Bellar / Robert M. Conroy / Christopher M.  
Garrett / Lana Isaacson/ Counsel**

Q-11. Please refer to Lana Isaacson's Rebuttal Testimony, page 4, lines 9-10, stating that "[t]he Companies have historically assumed \$0 avoided T&D costs in evaluating DSM-EE programs," and the August 7, 2025 HVT at approximately 12:09-12:11, and answer the following requests.

- a. State the Companies' total transmission plant net book value at the end of 2024.
- b. State the Companies' total distribution plant net book value at the end of 2024.
- c. State the approximate portion of the Companies' respective revenue requirements attributable to transmission- and distribution-related cost recovery.
- d. Confirm that through the Transmission System Improvement Program, or TSIP, the Companies spent \$719.6 million in transmission related capital projects (\$118.3 million in reliability improvements and \$601.3 million in resiliency improvements) over the five-year period of 2017-2021. If anything but confirmed, please explain.
- e. Confirm that "From January 1, 2022 to June 30, 2026, the Companies have spent and plan to spend over one billion dollars (\$1,024 million) in capital on transmission-related projects." If anything but confirmed, please explain.

A-11.

- a. The total transmission plant net book value at the end of 2024 for KU was \$1,335,119,698 and for LG&E was \$401,841,415.

- b. The Companies' total distribution plant net book value at the end of 2024 for KU was \$1,952,679,238 and for LG&E was \$1,432,657,406.
- c. The Companies object to this request as irrelevant because the requested information would have no bearing on avoided costs that might be used in future DSM-EE cost-benefit analyses. Without waiving that objection, the Companies state they cannot provide this information for a number of reasons, e.g., they do not calculate revenue requirements on a functional basis due to being vertically integrated; their revenue requirements are calculated based on capitalization, which is not functionalized; and their base rate revenues are not segregated by function.
- d. Not confirmed. The amounts noted include both O&M and Capital. See the McFarland Direct Testimony at page 8, lines 1-3, in Case Nos. 2025-00113 and 2025-00114.
- e. Confirmed. The statement is contained in the Conroy Direct Testimony at page 4 and McFarland Direct Testimony at page 25 in Case Nos. 2025-00113 and 2025-00114.