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**

JOINT APPLICATION

Kentucky Utilities Company ("KU") and Louisville Gas and Electric Company ("LG&E") (collectively "Companies"), pursuant to KRS Chapter 278, including KRS 278.020(1) and applicable sections of 807 KAR Chapter 5, hereby apply to the Kentucky Public Service Commission ("Commission") for Certificates of Public Convenience and Necessity ("CPCN") for the construction of two approximately 645 megawatt ("MW") net summer rating natural gas combined cycle combustion turbine ("NGCC") facilities, one at KU's E.W. Brown Generating Station in Mercer County, Kentucky ("Brown 12") and the other at LG&E's Mill Creek Generating Station in Jefferson County, Kentucky ("Mill Creek 6"), including on-site natural gas and electric transmission construction associated with those facilities.

The Companies further apply to the Commission pursuant to KRS Chapter 278, including KRS 278.020(1) and applicable sections of 807 KAR Chapter 5, for a CPCN to construct a 400 MW, 4-hour (1600 megawatt hour ("MWh")) lithium-ion battery energy storage system ("BESS") facility at LG&E's Cane Run Generation Station in Jefferson County, Kentucky ("Cane Run BESS").

KU further applies to the Commission pursuant to KRS Chapter 278, including KRS 278.020(1) and applicable sections of 807 KAR Chapter 5, for a CPCN to construct a selective catalytic reduction ("SCR") facility at its Ghent Generating Station in Carroll County, Kentucky for Ghent 2.

The Companies further apply to the Commission pursuant to KRS 278.216 and applicable sections of 807 KAR Chapter 5 for site compatibility certificates for Brown 12, Mill Creek 6, and the Cane Run BESS.

As discussed in Robert M. Conroy's testimony, the Companies are requesting the approval of regulatory asset treatment for the difference between allowance for funds used during construction ("AFUDC") accrued at the Companies' weighted average cost of capital and AFUDC accrued using the methodology approved by the Federal Energy Regulatory Commission ("FERC") during the construction periods of Brown 12, Mill Creek 6, and the Cane Run BESS. Regarding Brown 12, Mill Creek 6, and the Cane Run BESS, the Companies are also requesting regulatory asset treatment for post-in-service carrying costs, operating and maintenance expense, property taxes, investment tax credit amortization, and depreciation expense until such costs are fully reflected in the Companies' retail base rates or an applicable cost recovery mechanism. The Companies further request that post-in-service carrying costs be accrued using the Companies' weighted average cost of capital.

In support of this Joint Application, the Companies respectfully state:

1. <u>Addresses</u>: Applicant LG&E's full name and business address are: Louisville Gas and Electric Company, 820 W. Broadway, Louisville, Kentucky 40202. LG&E's mailing address is: Louisville Gas and Electric Company, 2701 Eastpoint Parkway, Louisville, Kentucky 40223.

Applicant KU's full name and business address are: Kentucky Utilities Company, One Quality Street, Lexington, Kentucky 40507. KU's mailing address is Kentucky Utilities

Company c/o Louisville Gas and Electric Company, 2701 Eastpoint Parkway, Louisville, Kentucky 40223.

The Companies may be reached by electronic mail at the electronic mail addresses of their counsel set forth below.

2. LG&E is incorporated in the Commonwealth of Kentucky and attests it is in good corporate standing. LG&E was incorporated in Kentucky on July 2, 1913.

3. KU is incorporated in the Commonwealth of Kentucky and the Commonwealth of Virginia and attests it is in good corporate standing in both states. KU was incorporated in Kentucky on August 17, 1912, and in Virginia on November 26, 1991.

4. LG&E is a public utility, as defined in KRS 278.010(3)(a), engaged in the electric and gas business. LG&E generates and purchases electricity, and it distributes and sells electricity at retail in Jefferson County and portions of Bullitt, Hardin, Henry, Meade, Oldham, Shelby, Spencer, and Trimble Counties. LG&E also purchases, stores, and transports natural gas, and it distributes and sells natural gas at retail in Jefferson County and portions of Barren, Bullitt, Green, Hardin, Hart, Henry, Larue, Marion, Meade, Metcalfe, Nelson, Oldham, Shelby, Spencer, Trimble, and Washington Counties.

5. KU is a public utility, as defined in KRS 278.010(3)(a), engaged in the electric business. KU generates and purchases electricity, and it distributes and sells electricity at retail in the following counties in Central, Northern, Southeastern, and Western Kentucky:

Adair	Edmonson	Jessamine	Ohio
Anderson	Estill	Knox	Oldham
Ballard	Fayette	Larue	Owen
Barren	Fleming	Laurel	Pendleton
Bath	Franklin	Lee	Pulaski
Bell	Fulton	Lincoln	Robertson
Bourbon	Gallatin	Livingston	Rockcastle
Boyle	Garrard	Lyon	Rowan
Bracken	Grant	Madison	Russell

Bullitt	Grayson	Marion	Scott
Caldwell	Green	Mason	Shelby
Campbell	Hardin	McCracken	Spencer
Carlisle	Harlan	McCreary	Taylor
Carroll	Harrison	McLean	Trimble
Casey	Hart	Mercer	Union
Christian	Henderson	Montgomery	Washington
Clark	Henry	Muhlenberg	Webster
Clay	Hickman	Nelson	Whitley
Crittenden	Hopkins	Nicholas	Woodford
Daviess			

6. Pursuant to 807 KAR 5:001 Section 8, on February 21, 2025, the Companies filed with the Commission notice of their intent to use electronic filing procedures in this proceeding. Copies of all orders, pleadings and other communications related to this proceeding should be directed to:

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Economic Development Efforts Lead to Unprecedented Load Growth

7. As explained in the testimony of Tim A. Jones and John Bevington, the Companies expect significant load growth from 2025 through 2032. Annual energy requirements are forecasted to climb sharply from 32,808 gigawatt hours ("GWh") in 2025 to a high of 48,129 in 2032. Seasonal system peak demands climb from 6,230 MW (summer) and 6,146 (winter) in 2025 to 8,034 MW (summer) and 7,930 (winter) in 2032.

8. Economic development load is responsible for virtually all this growth. The Companies' 2025 CPCN Load Forecast, which is described in Mr. Jones's testimony, projects that existing non-economic development load will decline slightly in the near-to-medium term, with a small amount of net growth beginning in the late 2030s. This projection is consistent with the Companies' earlier load forecasts the Commission found reasonable.[1] Economic development load, however, is projected to increase between 2025 and 2032 by approximately 2,000 MW.

9. The projections of significant economic development growth are driven primarily by the anticipated location of 1,750 MW of high load factor, energy-intensive data

[1] *Electronic Joint Application of Kentucky Utilities Company and Louisville Gas and Electric Company For Certificates of Public Convenience and Necessity and Site Compatibility Certificates and Approval of A Demand Side Management Plan and Approval of Fossil Fuel-Fired Generating Unit Retirements*, Case No. 2022-00402, (Ky. PSC Nov. 6, 2023), Order at 61-66; *Electronic 2021 Joint Integrated Resource Plan of Louisville Gas and Electric Company and Kentucky Utilities Company*, Case No. 2021-00393, Order Appx. "Commission Staff's Report on the 2021 Integrated Resource Plan of Louisville Gas and Electric Company and Kentucky Utilities Company" at 51 (Ky. PSC Sept. 16, 2022).

centers in the Companies' service territories. In its 2024 Regular Session, the Kentucky General Assembly enacted legislation to induce data centers to locate to Kentucky, which declared that "the inducement of the location of data center projects within the Commonwealth is of *paramount importance* to the economic well-being of the Commonwealth" and provided tax incentives for data centers to locate in Jefferson County.[2]

10. On January 16, 2025, Poe Development and PowerHouse Data Centers announced a joint venture to construct a 402 MW data center in Jefferson County.[3] As Mr. Bevington testifies, this first hyperscale data center in Kentucky is part of the more than 6,000 MW of prospective data center project load currently in the Companies' economic development queue.

11. In addition to data center load, the Companies' 2025 CPCN Load Forecast sponsored by Mr. Jones includes both phases of the BlueOval SK Battery Park ("BOSK"), with a summer peak load of more than 250 MW, as well as 20 MW from an economic development prospect in the auto industry and 19.4 MW from an existing customer's expansion. In all, as Mr. Bevington testifies, the Companies currently have over 8,000 MW of economic development load potential based upon their current list of potential customers, of which almost 2,000 MW is unrelated to data centers or BOSK.

12. Unlike most other customer loads, the projected economic development loads, particularly the BOSK and data center load, have very high load factors, estimated to be in the

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[2] 2024 Ky. Acts Ch. 166, § 38(3) (codified at KRS 154.20-222(3)) (emphasis added); *id.* at Ch. 166 § 42 (codified at KRS 139.499).

[3] *See, e.g.,* PowerHouse Data Centers, "PowerHouse Data Centers and Poe Companies Partner to Develop Kentucky's First Hyperscale Data Center Campus" (Jan. 16, 2025), available at https://www.powerhousedata.com/news/powerhouse-data-centers-and-poe-companies-partner-to-develop-kentuckys-first-hyperscale-data-center-campus (accessed Jan. 16, 2025).

range of 90 to 95 percent, respectively. As a result, these loads will have a large impact on energy requirements and demands in all hours, including system seasonal peak loads.

13. The Companies have a legal obligation to plan to serve and then actually serve these loads. KRS 278.030(2) requires that a utility "shall furnish adequate, efficient and reasonable service." "Adequate service" includes having sufficient capacity to serve the "maximum estimated" requirements of customers and to "assure . . . customers of reasonable continuity of service."[4] KRS 278.018(3) further provides that retail electric suppliers must render "adequate service" to facilities within its certified territory. The Commission has recognized that this obligation extends not only to existing customers, but also to new customers.[5] Accordingly, the Companies have requested CPCNs for the proposed facilities to ensure they will have sufficient resources to provide safe and reliable service at the lowest reasonable cost to serve their customers' projected needs.

CPCN Requests

14. Statement of Need (807 KAR 5:001, Section 15(2)(a)). As explained in the testimony of Messrs. Jones and Bevington, the Companies project unprecedented load growth from 2025 through 2032. The Companies currently anticipate that about 2,000 MW of economic development load will be added to the Companies' system compared to the Companies' existing load, including 1,750 MW of high load factor data centers and more than 250 MW of BOSK load, all of which the Companies also anticipate will have a high load factor, as well as other large customer loads, including 20 MW from an economic development

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[4] KRS 278.010(14).

[5] *See, e.g.*, *Joint Application of Powergen PLC, LG&E Energy Corp., Louisville Gas and Electric Company, and Kentucky Utilities Company for Approval of a Merger*, Case No. 2000-00095, Order at 22-24 (Ky. PSC May 15, 2000).

prospect in the auto industry and 19.4 MW from an existing customer's expansion as economic development load.

To continue to serve customers safely and reliably at the lowest reasonable cost in view of the Companies' load projections will require capacity additions to ensure adequate energy supply is available to meet customers' needs at every moment of every day, regardless of the weather or temperature. Tables 1 and 2 below reflect the capacity need beginning in 2028 based on minimum reserve margins of 23% in the summer and 29% in the winter.[6]

Table 1: Summer Peak Demand and Resource Summary (2025 CPCN Load Forecast, MW)

	2025	**2028**	**2029**	**2030**	**2031**	**2032**	**2035**	**2040**	**2050**
Peak Load	**6,230**	**6,795**	**7,304**	**7,677**	**8,040**	**8,034**	**8,017**	**7,992**	**7,967**
Fully Dispatchable Generation Resources									
Existing Resources	7,612	7,618	7,618	7,618	7,618	7,618	7,618	7,618	7,618
Retirements/Additions									
Coal	-300	-597	-597	-597	-597	-597	-1,009	-1,161	-2,029
Small-Frame SCCTs	0	-47	-47	-47	-47	-47	-47	-47	-47
NGCC (Mill Creek 5)	0	645	645	645	645	645	645	645	645
Total	7,312	7,619	7,619	7,619	7,619	7,619	7,207	7,055	6,187
Reserve Margin	17.4%	12.1%	4.3%	-0.8%	-5.2%	-5.2%	-10.1%	-11.7%	-22.3%
Renewable/Limited-Duration Resources									
Existing Resources	106	107	107	107	107	107	107	107	107
Existing CSR	107	107	107	107	107	107	107	107	107
Existing Disp. DSM	69	150	166	170	179	190	208	227	227
Retirements/Additions									
Solar	0	201	201	201	201	201	201	201	201
BESS	0	125	125	125	125	125	125	125	125
Dispatchable DSM	0	1	1	1	2	2	4	5	5
Total	282	689	705	710	719	730	747	766	766
Total Supply	**7,594**	**8,308**	**8,324**	**8,329**	**8,338**	**8,349**	**7,954**	**7,821**	**6,953**
Total Reserve Margin	**21.9%**	**22.3%**	**14.0%**	**8.5%**	**3.7%**	**3.9%**	**-0.8%**	**-2.1%**	**-12.7%**
Capacity Need	**68**	**50**	**660**	**1,114**	**1,552**	**1,534**	**1,907**	**2,009**	**2,846**

[6] Note the following for Tables 1 and 2:

1. "Coal" assumes Mill Creek 1 is retired at the end of 2024; Mill Creek 2 will be retired after Mill Creek 5 is commissioned in 2027. Any potential reduction in Ghent 2's summer capacity due to Ozone NAAQS regulations is not reflected.
2. "Small-Frame SCCTs" assumes Haefling 1-2 and Paddy's Run 12 are retired in 2026.
3. Existing Dispatchable DSM ("Existing Dep. DSM") reflects expected load reductions under normal peak weather conditions.
4. "Solar PPAs" assumes 120 MW of solar capacity is added in 2026, and an additional 120 MW of solar capacity is added in 2027. Capacity values reflect 83.7% expected contribution to summer peak capacity and 0% to winter peak capacity.
5. "BESS" assumes Brown BESS is in-service in 2027.
6. Positive values in "Capacity Need" reflect a capacity deficit.

Table 2: Winter Peak Demand and Resource Summary (2025 CPCN Load Forecast, MW)

	2025	2028	2029	2030	2031	2032	2035	2040	2050
Peak Load	**6,146**	**6,481**	**6,918**	**7,386**	**7,795**	**7,930**	**7,928**	**7,928**	**7,940**
Fully Dispatchable Generation Resources									
Existing Resources	7,909	7,977	7,977	7,977	7,977	7,977	7,977	7,977	7,977
Retirements/Additions									
Coal	-300	-597	-597	-597	-597	-597	-1,013	-1,013	-2,051
Small-Frame SCCTs	0	-55	-55	-55	-55	-55	-55	-55	-55
NGCC (Mill Creek 5)	0	660	660	660	660	660	660	660	660
Total	7,609	7,985	7,985	7,985	7,985	7,985	7,569	7,569	6,531
Reserve Margin	23.8%	23.2%	15.4%	8.1%	2.4%	0.7%	-4.5%	-4.5%	-17.7%
Renewable/Limited-Duration Resources									
Existing Resources	72	72	72	72	72	72	72	72	72
Existing CSR	111	111	111	111	111	111	111	111	111
Existing Disp. DSM	24	110	124	125	135	145	158	163	163
Retirements/Additions									
Solar	0	0	0	0	0	0	0	0	0
BESS	0	125	125	125	125	125	125	125	125
Dispatchable DSM	0	125	125	125	125	125	125	125	125
Total	206	417	431	433	442	452	465	471	471
Total Supply	**7,815**	**8,402**	**8,416**	**8,418**	**8,427**	**8,437**	**8,034**	**8,040**	**7,002**
Total Reserve Margin	**27.2%**	**29.6%**	**21.7%**	**14.0%**	**8.1%**	**6.4%**	**1.3%**	**1.4%**	**-11.8%**
Capacity Need	**113**	**-42**	**507**	**1,111**	**1,629**	**1,792**	**2,193**	**2,188**	**3,241**

To meet customers' projected demand and energy requirements shown above reliably and economically, the Companies gathered and developed cost and performance estimates for resources to be considered in the near term in addition to their existing and approved resources. The Companies accomplished this through a May 2024 request for proposals for renewable energy options ("May 2024 RFP"), which Charles R. Schram discusses. As David L. Tummonds testifies, the Companies also developed site-specific costs for Brown 12 and Mill Creek 6, and they also considered the cost and other considerations of siting an NGCC unit at KU's Green River Generating Station. As Mr. Tummonds further explains, the Companies also developed site-specific cost estimates for Cane Run BESS and a possible BESS facility at Ghent. On the demand side, consistent with the 2024 IRP, the Companies modeled new dispatchable demand-side management program measures and an expansion of the Companies' Curtailable Service Rider. As reflected in the Resource Assessment, the

Companies considered these reasonably available options while also considering the impacts of various load and fuel price scenarios.

The Companies' analysis concluded that the optimal plan for meeting customers' expected demand and energy needs safely and reliably across a wide variety of possible futures at the lowest reasonable cost includes the following:

- Construction of a 645 MW net summer rating NGCC unit at the E.W. Brown Generating Station (Brown 12) to be in service by 2030;
- Construction of a 645 MW net summer rating NGCC unit at the Mill Creek Generating Station (Mill Creek 6) to be in service by 2031;
- Construction of a 400 MW, 4-hour (1600 MWh) battery storage facility at the Cane Run Generation Station (Cane Run BESS) to be in service in 2028; and
- Construction of a SCR system at the Ghent Generation Station for Ghent 2 to be operational by 2028 for control of nitrogen oxides ("NO_x") emissions to help ensure ongoing compliance with National Ambient Air Quality Standards ("NAAQS") for ozone.

A detailed description of the Companies' analysis is set forth in Mr. Wilson's testimony and in the Resource Assessment (Exhibit SAW-1) attached to his testimony.

The Commission has previously found that a need existed for the construction of Brown 12. The Commission's Final Order in Case No. 2022-00402 denied a CPCN to construct Brown 12 to be in service in 2028 but expressly stated a need for the facility in 2030 existed and construction of Brown 12 should be deferred with the construction beginning "on a date that provides for an in-service date in 2030."[7]

15. Permits from Public Authorities (807 KAR 5:001, Section 15(2)(b)). The Companies will be required to obtain certain environmental and construction-related permits associated with the construction of the Brown 12, Mill Creek 6, the Ghent 2 SCR, and the Cane

[7] Case No. 2022-00402, Order of Nov. 6, 2023 at 137.

Run BESS. The required permits and the process for obtaining those permits are discussed in the direct testimonies of Philip A. Imber and Mr. Tummonds, which accompany this Joint Application and are incorporated herein by reference. Copies of those permits will be filed with the Commission, as obtained, to the extent required by law or requested by the Commission. The permits described by Messrs. Imber and Tummonds are the only permits that will be necessary for the projects for which approval is sought in this case.

16. Location of Proposed Construction (807 KAR 5:001, Section 15(2)(c)). Brown 12 will be located at KU's E.W. Brown Generating Station in Mercer County, Kentucky. Mill Creek 6 will be located at LG&E's Mill Creek Generating Station in Jefferson County, Kentucky. The Cane Run BESS facility will be located at LG&E's Cane Run Generating Station in Jefferson County, Kentucky. The proposed SCR facility for Ghent 2 will be located at KU's Ghent Generating Station in Carroll County, Kentucky. There are no like facilities in the vicinity of any of the proposed facilities, and the Companies do not anticipate that any of the proposed facilities will compete with any other public utilities, corporations, or persons.

17. Manner of Proposed Construction (807 KAR 5:001, Section 15(2)(c)). As explained in detail in the direct testimony of Mr. Tummonds, the Companies will construct Brown 12, Mill Creek 6, the Cane Run BESS, and the Ghent 2 SCR primarily through a self-build process. The Companies have selected or will select one or more engineering firms to perform engineering services, optimize design for the Companies' needs, support environmental permitting, and to assist the Companies in their procurement efforts. The Companies anticipate beginning construction for each project soon after receiving a CPCN and other required regulatory and environmental approvals. The Companies anticipate Brown 12

will be completed and operational in 2030 and Mill Creek 6 will be completed and operational in 2031. The Companies anticipate completing construction of the Cane Run BESS in 2028. KU expects that the SCR system for Ghent 2 will be constructed and operational by 2028.

18. Maps and Plans, Specifications and Drawings (807 KAR 5:001, Section 15(2)(d)). The required maps and the conceptual plans, specifications, and drawings for Brown 12, Mill Creek 6, the Cane Run BESS, and the Ghent 2 SCR are attached as Joint Application Exhibits 1, 2, 3, and 4, respectively.

19. Financing Plans (807 KAR 5:001, Section 15(2)(e)). The total projected capital cost for Brown 12, including related gas and electric transmission work, is approximately $1.383 billion. The total projected capital cost for Mill Creek 6, including related gas and electric transmission work, is approximately $1.415 billion. The total projected capital cost for the Cane Run BESS is approximately $775 million. The total projected capital cost for the SCR facility for Ghent 2 is approximately $152 million. The Companies' proposed financing of such costs is discussed in the direct testimony of Mr. Conroy, which accompanies this Joint Application and is incorporated herein by reference.

20. Estimated Cost of Operation (807 KAR 5:001, Section 15(2)(f)). The estimated annual cost of operation of the proposed construction projects is set forth in the direct testimony of Mr. Tummonds, which accompanies this Joint Application and is incorporated herein by reference.

21. Ownership. As discussed in the testimony of Messrs. Conroy and Wilson, the Companies currently anticipate that LG&E will own 100% of Brown 12 and Mill Creek 6 and that KU and LG&E will own 68% and 32%, respectively, of the Cane Run BESS. KU will

own 100% the Ghent 2 SCR. The costs for these projects will be allocated in accordance with their ultimate ownership percentages.

22. Site Compatibility Certificates (KRS 278.216). As explained by Messrs. Imber and Conroy, the Companies are requesting site compatibility certificates under KRS 278.216 for Brown 12, Mill Creek 6, and the Cane Run BESS. Attached as Joint Application Exhibits 5, 6, and 7 are the required Site Assessment Reports for Brown 12, Mill Creek 6, and the Cane Run BESS, respectively, with the content required by KRS 278.708.

Supporting Testimony

23. The Companies support their requests in this Joint Application with the verified testimony and exhibits of the following persons:[8]

- Lonnie E. Bellar, Senior Vice President, Engineering and Construction, PPL Services Corporation
- Robert M. Conroy, Vice President, State Regulation and Rates
- Phillip A. Imber, Director, Environmental Compliance, PPL Services Corporation
- Charles R. Schram, Director, Power Supply
- David L. Tummonds, Senior Director, Project Engineering
- Stuart A. Wilson, Director, Energy Planning, Analysis, and Forecasting
- Tim Jones, Senior Manager, Sales Analysis and Forecasting
- John Bevington, Senior Director, Business and Economic Development, PPL Services Corporation.

[8] Unless otherwise stated, the listed witnesses are officers or employees of LG&E and KU.

WHEREFORE, Kentucky Utilities Company and Louisville Gas and Electric Company respectfully request the Kentucky Public Service Commission to enter an order:

1. Granting the Companies a certificate of public convenience and necessity to construct an approximately 645 MW net summer rating natural gas combined cycle combustion turbine at KU's E.W. Brown Generating Station (Brown 12), including related gas and electric transmission construction at the station;

2. Granting the Companies a certificate of public convenience and necessity to construct an approximately 645 MW net summer rating natural gas combined cycle combustion turbine at LG&E's Mill Creek Generating Station (Mill Creek 6), including related gas and electric transmission construction at the station;

3. Granting the Companies a certificate of public convenience and necessity to construct a 400 MW, 4-hour (1,600 MWh) battery storage facility at LG&E's Cane Run Station (Cane Run BESS);

4. Granting KU a certificate of public convenience and necessity to construct a selective catalytic reduction system at KU's Ghent Generating Station for Ghent 2;

5. Granting the Companies site compatibility certificates pursuant to KRS 278.216 for Brown 12, Mill Creek 6, and the Cane Run BESS;

6. Approving (1) regulatory asset treatment for the difference between AFUDC accrued at the Companies' weighted average cost of capital and AFUDC accrued using the methodology approved by the FERC during the construction periods of Brown 12, Mill Creek 6, and the Cane Run BESS and (2) regulatory asset treatment for post-in-service carrying costs, operating and maintenance expense, property taxes, investment tax credit amortization, and depreciation expense until such costs are fully reflected in the Companies' retail base rates or

an applicable cost recovery mechanism, with post-in-service carrying costs to be accrued using the Companies' weighted average cost of capital; and

7. Granting any and all other relief to which the Companies may be entitled.

Dated: February 28, 2025

Respectfully submitted,

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<u>CERTIFICATE OF COMPLIANCE</u>

In accordance with 807 KAR 5:001, Section 8 as modified by the Commission's Order of July 22, 2021 in Case No. 2020-00085 (Electronic Emergency Docket Related to the Novel Coronavirus COVID-19), this is to certify that the electronic filing has been transmitted to the Commission on February 28, 2025; and that there are currently no parties in this proceeding that the Commission has excused from participation by electronic means.

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Counsel for Kentucky Utilities Company and Louisville Gas and Electric Company