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	Docket No. 2025-00045

LOUISVILLE METRO AND LFUCG'S
FIRST REQUEST FOR INFORMATION TO LG&E/KU

In accordance with the Public Service Commission's ("Commission") March 13, 2025 Order, Louisville/Jefferson County Metro Government ("Louisville Metro") and Lexington-Fayette Urban County Government ("LFUCG") propound the following data requests upon the Kentucky Utilities Company ("KU") and Louisville Gas and Electric Company ("LG&E")(collectively, the "Companies"). The Companies shall respond to these requests in accordance with the provisions of the Commission's March 13, 2025 Order, applicable regulations, and the instructions set forth below.

INSTRUCTIONS

1. Please provide written responses, together with any and all exhibits pertaining thereto, separately indexed and tabbed by each response.

2. The responses provided should restate LFUCG and Louisville Metro's request and also identify the witness(es) responsible for supplying the information.

3. If any request appears confusing, please request clarification directly from counsel for LFUCG and Louisville Metro.

4. Please answer each designated part of each information request separately. If you do not have complete information with respect to any item, please so state and give as much information as you do have with respect to the matter inquired about, and identify each person whom you believe may have additional information with respect thereto.

5. To the extent that the specific document, workpaper, or information does not exist as requested, but a similar document, workpaper, or information does exist, provide the similar document, workpaper, or information.

6. 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.

7. If the Companies object to any request on any grounds, please notify counsel for LFUCG and Louisville Metro as soon as possible.

8. For any document withheld on the basis of privilege, state the following: date; author; addressee; blind copies; all persons to whom distributed, shown, or explained; and, the nature and legal basis for the privilege asserted.

9. In the event any document called for has been destroyed or transferred beyond the control of the company, state the following: 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.

10. These requests shall be deemed continuing so as to require 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.

Respectfully submitted,

/s/ M. Todd Osterloh

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Request for Information

1. Describe how current ratepayers are protected if the load forecasted for projected development does not occur.

2. Explain whether the economic analyses for new generation facilities consider cost impacts for customers and not just LG&E/KU (the "Companies")? If so, what are these cost impacts for customers?

3. Refer to the testimony of Lonnie Bellar at page 2, describing the unprecedented large and rapid load growth projected by the Companies. State whether the Companies have identified any risks associated with the unprecedented scope and nature of the projected load growth and whether the Companies have developed any measures to mitigate against any such risk to protect their ratepayers from projected load growth that either fails to materialize or falls short of the projected levels at any time during the operational lives of the proposed certificate of public convenience and necessity ("CPCN") projects.

4. Refer to the testimony of Lonnie Bellar at page 7, indicating the current estimated completion cost for Mill Creek 5 NGCC is $913.4 million, and at page 10, regarding increase in the cost of Mill Creek 5.

    a) Provide in detail and quantify the factors that drove the increase from the initial cost estimate of $662 million as provided in Case No.

2022-00402 to the current estimated completion cost of $913.4 million.

b) Provide an estimate of the potential contractual risk related to force majeure and shipment delays.

5. Refer to the testimony of Lonnie Bellar at page 11, regarding the $25 million Unit Reservation Agreement with GE for the proposed Brown 12 NGCC.

a) State whether LG&E can recoup this cost if the company fails to obtain a CPCN for the construction of Brown 12.

b) Regarding Mill Creek 6, state when and what factors will be considered by LG&E to enter into a similar Unit Reservation Agreement and will the cost be the same as or similar to the agreement associated with Brown 12.

6. Refer to the testimony of David Tummonds at page 4, regarding the work by the Companies to leverage the current construction of Mill Creek 5 into advantages for Mill Creek 6. Explain why the estimated cost for Mill Creek 6 is higher than that of Brown 12 ($1.415 billion vs. $1.383 billion) even though Mill Creek 6 would have certain construction advantages that Brown 12 does not have.

7. Refer to the testimony of Stuart Wilson at page 18, regarding the 2025 CPCN Assessment constraint of Mill Creek 3 and 4 not operating beyond 2044 due to landfill storage capacity limits. Reconcile this assumed retirement dates for Mill

Creek 3 and 4 with the Companies' response to Commission Staff's First Data Request, Item 48.c., in Case No. 2022-00402, and Exhibit SAW-1 2025 Resource Assessment, page 40, in which the end of operating life of Mill Creek 3 and 4 are projected to be 2039 for both units.

8. Please refer to the testimony in Case No. 2022-00402 of John Crockett at page 8 in which he refers to a full-scale carbon capture feasibility study at the Cane Run NGCC facility. Please provide a status update to that study. Has it been completed? If so, please describe the results and provide a copy of the report? If not, when is the estimated completion date?

9. What is the estimated life expectancy of the proposed NGCC facilities (Brown 12 and Mill Creek 6)?

10. How much carbon is expected to be generated by the two NGCC units over the period 2030-2055?

11. Charles Schram testifies about the delivery of gas for the two new NGCC facilities. In addition, Lonnie Bellar testifies at page 10, lines 15-17 about the dramatic increase in the turbine costs, stating the "market has gotten tighter for NGCC turbines since then [the prior CPCN case] due to an increased demand for the NGCC facilities."

a) Explain whether the increased demand for gas turbines results in the price for construction of the two proposed facilities to dramatically increase.

b) If the CPCNs are approved, how long will construction take to complete the units and will construction contracts provide for a fixed price for the entire construction period?

c) Why has the commodity price for gas not increased as much as the cost of construction of the gas turbines? For gas supply contracts, what is the length of time for the longest duration of those contracts that are fixed price?

d) How long are typical gas transportation contracts that are expected and why have those prices not increased with the increased demand for the service?

12. Regarding the proposed NGCC facilities,

a) State whether the Companies plan to have on-site fuel storage for these facilities.

b) If the Companies plan to have on-site fuel storage, identity the storage capacity that is planned and the corresponding time the facilities can operate with only the fuel in storage.

c) If the Companies do not plan to have on-site fuel storage, confirm that the Companies would rely on the flow of natural gas from the transmission-pipeline owner.

d) Refer to the testimony of Charles Schram at pages 21-22, regarding firm gas transportation.

   i. State whether the firm gas transportation contract for Cane Run 7 NGCC is set to expire in 2027 and will need to be re-extended or re-negotiated.

   ii. Describe the term length that the Companies will seek for the delivery of firm gas to Mill Creek 6 and Brown 12 NGCCs.

   iii. Confirm that the Companies will seek to include in any firm gas transportation contracts for Mill Creek 6 and Brwon 12 NGCCs provisions for rollover rights to ensure opportunities to extend those contracts as needed.

13. What is the expected retirement date of Ghent 2 without the addition of the SCR technology? If the technology CPCN request is granted, when is the expected retirement date?

14. Have there been any announcements from the Trump Administration easing environment standards such that the expected Ghent 2 facility may operate

beyond its previously expected retirement date, even without adding the SCR? If so, please provide the EPA rule which has been impacted and provide the new retirement date.

15. Does PPL still have a goal of a net-zero greenhouse gas emissions ("GHG") by 2050? Do the Companies have a similar goal? If not, do the Companies have a GHG goal?

16. Please provide a list of every renewable generation project currently in operation that provides energy to the Companies.

a) For each such project, please provide the county in which it is located; the type of generation (e.g. solar, hydro); the nameplate capacity; whether it is company owned, leased or PPA (and if it is a PPA, who is the counterparty?)

b) Please provide the same information requested above for which the Companies expect to be in operation in ten years (planned units).

17. Did the Companies engage other major account holders to encourage them to be partners with the Companies in renewable projects? If yes, please describe what the Companies did. If not, please describe why not.

18. Refer to the Companies' Green Tariff, Option #3 Renewable Power Agreement, which requires a threshold of a minimum monthly billing load of 10 MVA or (MW as appropriate). Can customers aggregate accounts from the same customer

be eligible? If not, why not? Can different customers aggregate loads together to qualify? If not, why not?

19. Refer to the testimony of Charles Schram at pages 9-10 and 13, in which he indicates that costs associated with solar PPAs have increased and that the Companies' two owned solar projects are advancing. Explain whether the costs associated with the Companies' two owned solar projects are currently projected to be higher than anticipated as of the date the Companies originally requested Commission approval in Case No. 2022-00402.

20. Refer to the testimony of Charles Schram at page 11, regarding the execution risk related to the six solar PPAs and that this risk is a key reason for the companies' proposal to self-build the Cane Run battery energy facility. Explain why the Companies did not consider any self-build solar proposals in this matter.

21. Refer to the testimony of Stuart Wilson at page 32, regarding the Companies' ownership shares of the proposed projects.

a) The testimony states that the reason the Companies assigned 100 percent ownership of the proposed Brown 12 and Mill Creek 6 projects to LG&E was that the energy requirements of the anticipated 1,400 MW data center load would be assumed to be located in LG&E's service territory would exceed the energy produced by those two projects. However, as noted in the testimony, the 2025 CPCN Load Forecast projects 1,750 MW of data center load. Explain how the Companies intend to provide service to the remaining projected 350 MW data center load and associated energy requirements.

b) Further explain the ownership assignment of 68 percent to KU and 32 percent to LG&E of the proposed Cane Run battery storage facility (in contrast to the 100 percent LG&E ownership of the Brown battery storage facility).

22. Is the technology for the Battery Electric Storage System (BESS) proposed to be built at Cane Run the most energy efficient technology available in the market at this time? Please explain your answer.

23. With respect to the Brown BESS approved in Case No. 2022-000402, please provide the current status of construction to include:

a) The percentage of completion to date,
b) Expected completion date,
c) The costs expended to date on the project,
d) Expected completion date, and
e) Expected total costs for the completed project

24. Refer to the testimony of Charles Schram at page 26, regarding "fine-tuning the extensive settings associated with the battery resource to ensure optimal

integration with existing resources. This includes matching the battery's response to other ramping resources under some conditions while allow more rapid response under other system conditions." Explain this statement in more detail along with a hypothetical example illustrating this statement.

25. Elaborate on the purposes of the BESS and how it was sized. How does the 400MW, 4-hour system compare to the duration and size of the peak loads forecasted for 2032?

26. In the Integrated Resource Plan presented to the Commission in Case No. 2024-00326 a load forecast was included. When was that forecast prepared? When did the Companies prepare the new load forecast submitted in this matter?

27. How is the term "economic load growth," which is used throughout the Application, defined?

28. Is any of the anticipated economic development load expected to receive federal funds of any type to support the loads? If yes, please state the project, the amount of the load and the source of federal funding.

29. State whether the Companies anticipate receiving federal or state incentives for the facilities on which approval is sought in this matter.

30. If projected development does not come to fruition, or does not occur at the level forecasted, will the Companies accelerate plans for retirement of existing, coal generating facilities?

31. Regarding the BlueOval SK Battery Park (BOSK),

a) Has construction been initiated for Phase 2 of the BOSK?

b) When will power be needed for Phase 1 of BOSK so that the batteries can be produced?

c) How long after receiving the approval for construction of Phase 2 will it take before Phase 2 can produce batteries?

d) From now until Phase 2 of BOSK is complete, will the entire facility need only one-half of the projected 250 MWs? If not, why not?

32. Does the owner of the proposed 402MW data center to be located in Jefferson County have renewable targets that it must meet at that facility? If so, what are those targets? How much of those targets are expected to be met on-site by self-generation behind the meter?

33. State whether either of the Companies have executed any contracts with Poe Development and PowerHouse Data Centers—or any other data center—related to electric service or rates. If yes, please provide a copy of the contract(s). If no, please state whether the Companies anticipate executing a contract with data centers related to electric rates and service and when those contracts would be anticipated to be executed.

34. If a data center were to receive electrical service from LG&E or KU without a special contract, identify the rate classification(s) on which charges to the data center would be based.

35. Have the Companies required data centers or other large-load customers to provide a form of security to ensure repayment of costs to the Companies that are incurred to provide service to the data centers or other large-load customers?

36. Do the Companies anticipate requiring data centers or other large-load customers to provide a form of security to ensure repayment of costs to the Companies that are incurred to provide service to the data centers or other large-load customers?

37. Many Companies in the data center market have renewable energy requirements. Have the new customers' requests for energy included requirements for renewable power? How will LGE-KU meet these requirements?

38. Do the Companies have minimum monthly billing demand based on a large-load customer's on-peak contract capacity or other factor? If yes, please detail these minimum requirements. If no, state whether the Companies anticipate proposing a minimum requirement in the future.

39. Refer to the testimony of John Bevington at pages 5 and 14, in which he indicates there is "more than 6,000 MW of total data center load in the Companies' more than 8,000 MW economic development queue."

a) Please describe in detail what comprises the anticipated 6,000 MW total data center load, including number and energy needs of anticipated data centers, timing of energy needs, and projected geographical locations of the data centers.

b) Describe how data centers located in Kentucky will impact economic development in Kentucky.

c) Describe in detail the additional 2,000 MW load in the economic development queue.

40. Refer to the testimony of John Bevington at page 9, regarding the Meta data center project to be located in Entergy Louisiana's service territory. The testimony indicates that Meta pledges to "invest more than $200 million in local infrastructure improvements, contribute up to $1 million annually to Entergy's low-income customer support program, and work with Entergy to bring at least 1,500 MW of new renewable energy to the grid."

a) State whether the Companies' discussions with any of the potential data center projects include the types of pledges that are involved in the Meta data center project in Louisiana.

b) State whether the Companies anticipate any of the data center projects that the Companies are interacting with would result in similar pledges that were made by the Meta data center project in Louisiana.

41. Refer to the testimony of John Bevington at page 10, in which he states that data centers can provide significant property tax revenue. Describe and quantify the anticipated tax benefits of data centers planned in the Companies' service territory.

42. Describe what infrastructure additions or upgrades the Companies anticipate making in order to serve data centers.

43. Refer to the testimony of John Bevington at page 9, in which he indicates that data centers have an average load factor of 95 percent. Given data centers' needs for uninterrupted service, state whether adjustments would be appropriate to the Companies' reserve margins if 6,000 MW of total data center load is added to the Companies' system.

44. Refer to Application ¶ 14, in which the Companies indicate that they anticipate 20 MW from an economic development prospect in the auto industry and 19.4 MW from an existing customer's expansion as economic development load. Please describe in detail these prospects, the location of these potential projects, and the reasons why the Companies believe that it is reasonable to include the projects in their forecasts

45. Considering the impact to peak load and the concentration of load (e.g. few, large customers), explain whether there is a DSM obligation of the new customers.