

**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  
SECOND 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 request for information 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,

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## REQUEST FOR INFORMATION

1. Refer to LG&E/KU's response to Commission Staff's First Request for Information, Item 1.b., regarding the certainty of the 600 MW data center proposed to be located Oldham County. An article published in the Courier-Journal on April 15, 2025, reported objections from Oldham County residents against the project at its current proposed location. State whether LG&E/KU's response to Commission Staff's First Request for Information, Item 1.b., has changed in light of the contents of that media coverage.
2. Refer to LG&E/KU's response to Commission Staff's First Request for Information, Item 18.c.
  - a. For the economic development project stages labeled as "Inquiry," "Suspect," or "Prospect," identify the projects associated with each category along with the load and potential location of each of those projects.
  - b. For the "Prospect" stage, identify the project(s) that is/are closest to being transitioned to the "Imminent" stage.
3. Refer to LG&E/KU's response to Commission Staff's First Request for Information, Item 28.c., provide further details of what minimum contract duration, minimum contract demand, and credit support, assurance, or security requirements would entail.
4. Refer to LG&E/KU's response to Commission Staff's First Request for Information, Item 96, regarding economic development discount rates. State whether LG&E/KU intend to offer economic development discount rates to any of the potential data centers that are projected to located within their service territories.
5. Refer to LG&E/KU's response to Kentucky Coal Association's First Request for Information, Item 4. State when the results of the analysis on the continued operation of Mill Creek Unit 2 are expected to be completed.

6. Metro-LFUCG's First Request for Information, Item 1 asked "how current ratepayers are protected if the load forecasted for projected development does not occur." The Companies' response simply cross-referenced the response to PSC 1-28. The Companies' response to PSC 1-28 does not appear to address how current ratepayers will be protected if the load forecasted for projected development does not occur regardless of the likelihood of whether the load forecasted for projected development does not occur. Please explain how current ratepayers are protected if the load forecasted for projected development does not occur.
  
7. Refer to LG&E/KU's response to Metro-LFUCG's First Request for Information, Item 6. Confirm whether the difference in timing of the contracts for labor and materials is the only factor as to why the Companies believe that the EPC bids will reflect some cost efficiency for Brown 12 and an escalated difference for Mill Creek 6. If there are other factors, please describe what those factors are.
  
8. Refer to LG&E/KU's response to Metro-LFUCG's First Request for Information, Item 11.
  - a. State whether the Companies have developed a scoring rubric to evaluate proposals submitted by prospective EPC contractors. If yes, provide a copy of that scoring rubric. If not, explain if and when they will develop such a rubric.
  
  - b. Provide copies of any scoring rubric developed or used by the Companies over the last five years for evaluating EPC contractors on generation facilities.
  
9. Refer to LG&E/KU's response to Metro-LFUCG's First Request for Information, Item 19. The item asked 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. The Response referred to the testimony of Lonnie Bellar at pages 8-9, which indicates that costs for the Marion County Solar project have increased \$35 million since the estimate

provided in Case No. 2022-00402. Mr. Bellar does not provide a similar comparison for Mercer County Solar. Please state whether the costs associated with the Companies' Mercer County Solar project are currently projected to be higher than anticipated as of the date the Companies originally requested Commission approval in Case No. 2022-00402, and if so, quantify the anticipated increase.

10. Please explain how the term "economic development load" is defined, as used in the Companies' application. Include in your response whether the Companies have tracked actual or forecasted projected economic development load prior to the preparation of the most recent Integrated Resource Plan and this case. (Note: This question corrects the term identified in Metro-LFUCG's First Request for Information, Item 27.)
  
11. Refer to LG&E/KU's response to Metro-LFUCG's First Request for Information, Items 32 and 37.
  - a. State whether the Companies plan to communicate with data centers regarding their renewable capacity requirements.
  - b. If data centers have renewable capacity requirements, explain how the Companies will satisfy those requirements.
  - c. State whether it is possible that a data center would choose not to locate in the territory of an electric utility if the electric utility cannot satisfy the data center's renewable capacity requirements.
  
12. Refer to LG&E/KU's response to Metro-LFUCG's First Request for Information, Item 45 and LG&E/KU's response to Commission Staff's First Request for Information, Item 28b. State whether the Companies will propose requirements for participation in DSM programs in new tariff provisions for large, high load factor customers. If not, please explain why not.