

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

In the Matter of:

ELECTRONIC APPLICATION OF KENTUCKY)	
UTILITIES COMPANY FOR AN ADJUSTMENT OF)	
ITS ELECTRIC AND GAS RATES AND)	CASE NO. 2025-00113
APPROVAL OF CERTAIN REGULATORY AND)	
ACCOUNTING TREATMENTS)	

In the Matter of:

ELECTRONIC APPLICATION OF LOUISVILLE)	
GAS AND ELECTRIC COMPANY FOR AN)	
ADJUSTMENT OF ITS ELECTRIC AND GAS)	CASE NO. 2025-00114
RATES AND APPROVAL OF CERTAIN)	
REGULATORY AND ACCOUNTING)	
TREATMENTS)	

**SUPPLEMENTAL REHEARING REQUESTS FOR INFORMATION OF JOINT
INTERVENORS KENTUCKIANS FOR THE COMMONWEALTH, KENTUCKY
SOLAR ENERGY SOCIETY, MOUNTAIN ASSOCIATION, AND METROPOLITAN
HOUSING COALITION TO LOUISVILLE GAS & ELECTRIC COMPANY AND
KENTUCKY UTILITIES COMPANY**

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Dated: May 8, 2026

DEFINITIONS

1. "Document" means the original and all copies (regardless of origin and whether or not including additional writing thereon or attached thereto) of any memoranda, reports, books, manuals, instructions, directives, records, forms, notes, letters, or notices, in whatever form, stored or contained in or on whatever medium, including digital media.
2. "Study" means any written, recorded, transcribed, taped, filmed, or graphic matter, however produced or reproduced, either formally or informally, a particular issue or situation, in whatever detail, whether or not the consideration of the issue or situation is in a preliminary stage, and whether or not the consideration was discontinued prior to completion.
3. "Person" means any natural person, corporation, professional corporation, partnership, association, joint venture, proprietorship, firm, or the other business enterprise or legal entity.
4. A request to identify a natural person means to state his or her full name and business address, and last known position and business affiliation at the time in question.
5. A request to identify a document means to state the date or dates, author or originator, subject matter, all addressees and recipients, type of document (e.g., letter, memorandum, telegram, chart, etc.), identifying number, and its present location and custodian. 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.
6. A request to identify a person other than a natural person means to state its full name, the address of its principal office, and the type of entity.
7. "And" and "or" should be considered to be both conjunctive and disjunctive, unless specifically stated otherwise.
8. "Each" and "any" should be considered to be both singular and plural, unless specifically stated otherwise.
9. Words in the past tense should be considered to include the present, and words in the present tense include the past, unless specifically stated otherwise.

10. “You” or “your” means the person whose filed testimony is the subject of these data requests and, to the extent relevant and necessary to provide full and complete answers to any request, “you” or “your” may be deemed to include any other person with information relevant to any interrogatory who is or was employed by or otherwise associated with the witness or who assisted, in any way, in the preparation of the witness’ testimony.
11. “Companies” means, collectively, Kentucky Utilities Company and Louisville Gas & Electric Company, and their parents or subsidiaries, and/or any of their officers, directors, employees or agents who may have knowledge of the particular matter addressed, and affiliated companies including member cooperatives.
12. “Kentucky Utilities Company” or “KU” means Kentucky Utilities Company, and its parents or subsidiaries, and/or any of its officers, directors, employees or agents who may have knowledge of the particular matter addressed, and affiliated companies including member cooperatives.
13. “Louisville Gas & Electric Company” or “LG&E” means Louisville Gas & Electric Company, and its parents or subsidiaries, and/or any of its officers, directors, employees or agents who may have knowledge of the particular matter addressed, and affiliated companies including member cooperatives.
14. “Joint Intervenors” means Kentuckians for the Commonwealth, Kentucky Solar Energy Society, Mountain Association, and Metropolitan Housing Coalition, and Metropolitan Housing Coalition, who have been moved for the status of full intervention as joint intervenors in this matter.
15. Unless otherwise specified in each individual request the term “tariff” means the tariff as filed in this matter by LG&E and KU.
16. “Commission” or “PSC” means the Kentucky Public Service Commission, including its Commissioners, personnel, and offices.
17. “DER” means Distributed Energy Resource.
18. “DPV” means Distributed Solar Photovoltaics.
19. “DR” means Demand Response.
20. “EHLF” means Extremely High Load Factor.
21. “ELCC” means Effective Load Carrying Capacity.

22. "FERC" means Federal Energy Regulatory Commission.

23. "MVA" means Megavolt-Ampere.

24. "MW" means Megawatt.

INSTRUCTIONS

1. If any matter is evidenced by, referenced to, reflected by, represented by, or recorded in any document, please identify and produce for discovery and inspection each such document.
2. These requests for information are continuing in nature, and information which the responding party later becomes aware of, or has access to, and which is responsive to any request is to be made available to Joint Intervenors. Any studies, documents, or other subject matter not yet completed that will be relied upon during the course of this case should be so identified and provided as soon as they are completed. The Respondent is obliged to change, supplement and correct all answers to interrogatories to conform to available information, including such information as it first becomes available to the Respondent after the answers hereto are served.
3. Unless otherwise expressly provided, each data request should be construed independently and not with reference to any other interrogatory herein for purpose of limitation.
4. The answers provided should first restate the question asked and also identify the person(s) supplying the information.
5. Please answer each designated part of each information request separately. If you do not have complete information with respect to any interrogatory, 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.
6. In the case of multiple witnesses, each interrogatory should be considered to apply to each witness who will testify to the information requested. Where copies of testimony, transcripts, or depositions are requested, each witness should respond individually to the information request.
7. Wherever the response to a request consists of a statement that the requested information is already available to Joint Intervenors, please provide a detailed citation to the document that contains the information. This citation shall include the title of the document, relevant page number(s), and, to the extent possible, paragraph number(s) and/or chart/table/figure number(s).

8. If you claim a privilege including, but not limited to, the attorney-client privilege or the work product doctrine, as grounds for not fully and completely responding to any discovery request, please describe the basis for your claim of privilege in sufficient detail so as to permit Joint Intervenors or the Commission to evaluate the validity of the claim. With respect to documents for which a privilege is claimed, please produce a "privilege log" that identifies the author, recipient, date, and subject matter of the documents or interrogatory answers for which you are asserting a claim of privilege and any other information pertinent to the claim that would enable Joint Intervenors or the Commission to evaluate the validity of such claims.
9. Whenever the documents responsive to a discovery request consist of modeling files (including inputs or output) and/or workpapers, the files and workpapers should be provided in machine-readable electronic format (e.g., Microsoft Excel), with all formulas and cell references intact.
10. The interrogatories are to be answered under oath by the witness(es) responsible for the answer.

SUPPLEMENTAL REHEARING REQUESTS
PROPOUNDED TO LOUISVILLE GAS & ELECTRIC
COMPANY AND KENTUCKY UTILITIES COMPANY BY
JOINT INTERVENORS

Joint Intervenors hereby tender the following supplemental requests for information to the Company:

- 6.1 Refer to the Response of Kentucky Utilities Company and Louisville Gas and Electric Company to the Commission Staff's First Rehearing Request for Information Dated April 10, 2026, A-15, and:
- a. Confirm the "analysis performed to determine" the "benefits to customers" is based on a comparison of the Commission-approved return on equity in these cases (9.775%) and the lower end of the "deadband" proposed in the Stipulation (9.40%);
 - b. Provide the same analysis comparing the Commission-approved return on equity and the "high end" of the dead band proposed in the Stipulation (10.15%);
 - c. If the Ordered ROE is not changed but a Sharing Mechanism rider is allowed, state whether the Companies propose a downward adjustment to the Sharing Mechanism's "deadband" to maintain the "critical[] ... asymmetr[y]"¹ of the proposed rider; and
 - d. Confirm whether the Companies agree that the current Order does not set any lower or higher bound for actual achieved return on equity for the Companies.
- 6.2 Please refer to Response of Kentucky Utilities Company and Louisville Gas and Electric Company to the Sierra Club's Post Hearing Request for Information Dated April 10, 2026, A-4-2, and
- a. Provide the same analysis for all rate classes;
 - b. Explain whether the difference in rate impact across all rate classes of the Commission's February 16, 2026 Orders in these dockets compared to the filed Stipulation matches the difference between the Commission's Revenue

¹ Kentucky Utilities Company and Louisville Gas and Electric Company, *Joint Petition of Kentucky Utilities Company and Louisville Gas and Electric Company for Reconsideration Of The February 16, 2026 Orders* at 10 (Mar. 11, 2026) ("Companies' Rehearing Petition").

Requirement and the Stipulated Revenue Requirement,² or explain any difference.

- 6.3 Please refer to Response of Kentucky Utilities Company and Louisville Gas and Electric Company to Rehearing Requests for Information of Joint Intervenors Kentuckians for the Commonwealth, Kentucky Solar Energy Society, Mountain Association, and Metropolitan Housing Coalition Dated April 10, 2026 (Companies' Response to JI 5) at A-5.3, and
- a. Specify the amount of FERC 108 Cost of Removal capital the Companies added to the claimed Mill Creek 2 stay-open costs;
 - b. Explain in full how FERC 108 Cost of Removal capital related to Mill Creek 2 was addressed in the rates approved in Case Nos. 2020-00349 and 2020-00350.
 - c. Explain in full how FERC 108 Cost of Removal capital related to Mill Creek 2 were addressed in the Companies' base rate increase proposal in these proceedings.
 - d. Please provide the "number used for base rates" for Mill Creek 2 O&M in each month of the test year relied on in Case Nos. 2020-00349 and 2020-00350.
 - e. Please provide the Companies' actual monthly Mill Creek 2 O&M expenses from July 1, 2021 to July 31, 2025. If already provided, please identify where this information is available in the record of these proceedings.
 - f. Explain by whom, when, and where the Company was "asked to keep the unit in operation"; please provide citations to relevant dockets.
- 6.4 Please refer to the Companies' Response to JI 5 at A-5.4, and provide the attached calculations along with any supporting workpapers in machine-readable electronic format (e.g., Microsoft Excel), with all formulas and cell references intact.

[Signature on next page]

² Companies' Rehearing Petition at 4.

Respectfully Submitted,



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CERTIFICATE OF SERVICE

In accordance with the Commission's July 22, 2021 Order in Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19*, this is to certify that the electronic filing was submitted to the Commission on May 8, 2026; that the documents in this electronic filing are a true representation of the materials prepared for the filing; and that the Commission has not excused any party from electronic filing procedures for this case at this time.



Byron L. Gary