

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

In the Matter of:

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

**INITIAL REQUESTS FOR INFORMATION OF JOINT INTERVENORS  
KENTUCKIANS FOR THE COMMONWEALTH, KENTUCKY SOLAR  
ENERGY SOCIETY, AND MOUNTAIN ASSOCIATION TO KENTUCKY  
UTILITIES COMPANY**

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Mountain Association*

Dated: July 03, 2025

## **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. “Company”, “Kentucky Utilities Company”, or “KU”, means Kentucky Utilities Company, their 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.
12. “Joint Intervenors” means Kentuckians for the Commonwealth, Kentucky Solar Energy Society, and Mountain Association who have been moved for the status of full intervention as joint intervenors in this matter.
13. Unless otherwise specified in each individual request the term “tariff” means the tariff as filed in this matter by KU.
14. “Commission” or “PSC” means the Kentucky Public Service Commission, including its Commissioners, personnel, and offices.
15. “LIHEAP” means “Low Income Home Energy Assistance Program.”
16. “kW” means “kilowatt.”
17. “kWh” means “kilowatt-hour.”
18. “FERC” means the Federal Energy Regulatory Commission.
19. “DPA” means “deferred payment arrangements.”
20. “DER” means “distributed energy resource.”
21. “IRS” means the Internal Revenue Service.
22. “HEA” means “home energy assistance.”
23. “FLEX” means “Fixed and Limited Income Extension.”

24. "Rcvd" means "received."
25. "Dlvd" means "delivered."
26. "NMS" means "Net Metering Service."
27. "AC" means "alternating current."
28. "DC" means "direct current."
29. "KRS" means "Kentucky Revised Statute."
30. "SQF" refers to "Small Capacity Cogeneration and Small Power Production Qualifying Facilities."
31. "LQF" refers to "Large Capacity Cogeneration and Large Power Production Qualifying Facilities."
32. "SAIDI" means "system average interruption duration index."
33. "SAIFI" means "system average interruption frequency index."
34. "CAIDI" means "customer average interruption duration index."
35. "MED" means "major event day."
36. "NESC" means "National Electrical Safety Code."
37. "PPA" means "power purchase agreement."
38. "ELHF" means "Extremely High Load Factor."
39. "AMI" means "advanced metering infrastructure."
40. CPCN means "certificate of public convenience and necessity."
41. "RTO" means "Regional Transmission Organization."
42. "MMBtu" means "one billion British thermal units."

43. “IRP” means “Integrated Resource Plan.”

44. “NERC” means “North American Electric Reliability Corporation.”

45. “IVR” means “interactive voice response.”

46. “VRU” means “voice response unit.”

## **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.

**INITIAL DATA REQUESTS PROPOUNDED TO**  
**KENTUCKY UTILITIES COMPANY BY JOINT**  
**INTERVENORS**

Joint Movants for Joint Intervention hereby tender the following initial requests for information to the Company:

- 1.1. In excel format, please provide each zip code served in whole or part by each company.
- 1.2. In Excel format, by zip code, as well as for the company as a whole, for the year ending December 31, 2024 (or for the most recent month available if this month is not available), please provide the number of residential customers.
- 1.3. In Excel format, by zip code, as well as for the company as a whole, for the year ending December 31, 2024 (or for the most recent month available if this month is not available), please provide the number of residential customers identified as “low-income.”
- 1.4. In identifying customers as “low-income” for the immediately preceding data request, please provide a detailed explanation of each indicator of “low-income” status the Company used in identifying a customer as low-income.
- 1.5. In Excel format, by zip code, as well as for the company as a whole, for the most recent month available, please provide:
  - a. The number of customers having received a LIHEAP cash grant; and
  - b. The number of customers having received an energy assistance grant other than or in addition to LIHEAP.
- 1.6. In Excel format, by zip code, as well as for each company as a whole, for the most recent month available, please provide the estimated number of customers with annual income at or below 150% of the Federal Poverty Level.
- 1.7. In Excel format, in sufficient detail to allow replication, by month for the most recent 24 months, please provide residential bills at median use given:
  - a. Existing rates;
  - b. Rates as proposed in this proceeding.
- 1.8. In Excel format, in sufficient detail to allow replication, for the most recent 24 months, please provide residential bills at mean use given:
  - a. Existing rates;
  - b. Rates as proposed in this proceeding.



- 1.9. In Excel format, for the most recent three years, and projected for the next two years, please provide the percentage of total annual residential bills disaggregated by fixed charges and volumetric charges given:
  - a. Existing rates;
  - b. Rates as proposed in this proceeding.
- 1.10. In Excel format, in increments of 100 kWh, provide the percentage of total bill comprised of fixed charges and the percentage of total bill comprised of volumetric charges given:
  - a. Existing rates;
  - b. Rates as proposed in this proceeding.
- 1.11. In Excel format, by month for the most recent 24 months, please provide the median monthly residential usage.
- 1.12. In Excel format, by month for the most recent 24 months, please provide the median monthly residential bills.
- 1.13. In Excel format, by month for the most recent 24 months, please provide the median monthly residential arrearage.
- 1.14. In Excel format, please provide by month for each month from October 2023 to the present:
  - a. Dollars of total residential billings attributable to volumetric charges;
  - b. Dollars of total residential billings attributable to fixed monthly service charges;
  - c. Dollars of total residential billings attributable to late payment charges;
  - d. Dollars of total residential billings attributable to miscellaneous customer service fees (other than late charges).
- 1.15. In Excel format, by month for the months October 2023 to the present inclusive, please provide for residential customers:
  - a. The number of residential customers;
  - b. The number of bills issued to residential customers;
  - c. The dollars billed for current service to residential customers;
  - d. The number of payments received from or on behalf of residential customers;
  - e. The dollars of payments received from or on behalf of residential customers;
  - f. The number of residential accounts with an unpaid balance on their monthly bill;
  - g. The number of residential accounts with a \$0 balance on their monthly bill;
  - h. The number of residential accounts with a credit balance on their monthly bill.

- 1.16. Please provide complete residential tariff sheets, if any, for each and every one of the following, or specific citation to where in publicly-available copies of existing and proposed tariff sheets each of the following may be found:
  - a. Late fees;
  - b. Deposits;
  - c. Bad check fees;
  - d. Disconnect/reconnect fees (for nonpayment);
  - e. New service connection fees;
  - f. Field collection fees.
- 1.17. For each fee for which a tariff page was provided, please provide for the three most recent Fiscal Years and for the current Fiscal Year to date:
  - a. The total residential revenue by year generated by that fee;
  - b. The ratemaking treatment of that revenue; and
  - c. The proposed ratemaking treatment of that revenue in this proceeding.
- 1.18. For each fee for which a tariff page was provided, please provide a line-item explanation of how each expense recovered through the fee is allocated between customer classes. In this explanation, provide a specific identification of the specific allocator that is used to allocate the expenses. Separately indicate whether the expense is reduced or offset by the revenue generated by the customer service fee prior to being allocated between classes.
- 1.19. For each fee for which a tariff page was provided immediately above, provide a detailed explanation of how the expenses collected through that fee are removed from the expenses otherwise allocated to the residential kWh charge in the Company's allocated cost of service study. In providing this description, provide a specific reference, by line number and page number, to the Company's allocated cost of service study at which place the expenses have been removed from those expenses otherwise allocated to the residential class.
- 1.20. Assume for purposes of this Data Request that a residential bill is rendered on Day 1. Assume further the bill remains unpaid. Provide a timeline identifying each collection step until the bill is final-billed for nonpayment. Identify the Day on which each step of the collection process can be expected to occur.
- 1.21. Assume for purposes of this Data Request, that 100 residential bills are rendered on Day 1. Please provide:
  - a. What percent of those bills are paid by the due date of the bill. Please identify what Day the due date falls on.
  - b. What percent of those bills are paid by the time the next month's bill is rendered.
  - c. What percent of those bills are paid by the time the second subsequent bill is rendered.

- d. What percent of those bills are paid by the time the third subsequent bill is rendered.
- 1.22. By year for the most recent five years available, please provide:
- a. The total dollars of FERC electric refunds received by the Company disaggregated by refund;
  - b. The total dollars of FERC fines, sanctions or other penalties received by the Company disaggregated by each instance of fines, sanctions or other penalties.
- 1.23. For each of the dollar amounts identified above, please provide:
- a. The refund to customers disaggregated by customer class;
  - b. The dollars not refunded to customers due to a failure to meet the tariff thresholds for providing refunds;
  - c. The dollars currently held, and the length of time those dollars have been held, due to a failure to refund those dollars because the size of the refund has not met the tariffed thresholds for providing refunds.
- 1.24. Please provide the application for service for electricity service.
- 1.25. Separately identify all information that an applicant for service must provide to the Company above and beyond the information solicited in the application for service for electricity service.
- 1.26. Please identify all circumstances, if any, under which the company may decline to provide service to an applicant for service.
- 1.27. Please provide a complete copy of any and all internal Company policies regarding the percentage of bill, or dollar amount, that will be reserved for write-offs or uncollectibles based on:
- a. The size of arrears in dollars;
  - b. The age of arrears in months.
- 1.28. In Excel format, please provide by month for each month since October 2023, the dollars of arrears by aging bucket for residential customers using the following aging bands: total; 1-30 days; 31-60 days; 61-90 days; 91-180 days; and more than 180 days. If aging bands other than those identified are used by the Company, provide those bands that the Company uses. Indicate whether the data provided in each band is additive.
- 1.29. In Excel format, please provide by month for each month since October 2023, the number of accounts by arrearage aging bucket for residential customers using the following aging bands: total; 1-30 days; 31-60 days; 61-90 days; 91-180 days; and more than 180 days. If aging bands other than those identified are

used by the Company, provide those bands that the Company uses. Indicate whether the data provided in each band is additive.

- 1.30. Please identify all ways, if any, in which identified low-income customers are treated differently from residential customers who are not identified as low-income, with respect to:
  - a. The imposition, calculation, refund or other treatment of cash security deposits;
  - b. Shutoffs for nonpayment (other than seasonal protections);
  - c. Shutoff notices (e.g., number of, timing of, content of, etc.);
  - d. Seasonal nonpayment shutoff protections;
  - e. Late payment charges;
  - f. Deferred payment arrangements ("DPAs"), including downpayments, monthly installments, terms (in months) or other DPA components or procedures;
  - g. Reconnection fees;
  - h. Collection fees (if any) (distinguish by type of fee if distinctions arise for more than one fee);
  - i. Levelized budget billing (including not only the monthly budget billing but also any annual true-up or other budget billing process or component).
- 1.31. For each item identified in the immediately preceding discovery request for which the Company treats identified low-income customers differently from residential customers not identified as low-income, please indicate whether the authorization or mandate or other source for the differential treatment lies in:
  - a. Statute;
  - b. Commission regulation;
  - c. Company tariff;
  - d. Company process not included in a tariff;
  - e. Other (please identify).
- 1.32. Please provide a copy of all written documents, including tariffs, staff training manuals and staff "procedures" manuals, that describe and explain the policies and procedures for when it is appropriate and/or inappropriate to negotiate deferred payment plans.
- 1.33. Please provide a list of all internal policy constraints placed on the entry into a deferred payment agreement. Such constraints might include, but not be limited to, for example, a prior defaulted payment arrangement, or other similar policies.
- 1.34. Please provide a copy of all written documents, including tariffs, staff training manuals and staff "procedures" manuals, and/or specific citation to the location of such in publicly-available materials, that describe and explain the policies and procedures for negotiating the terms of deferred payment plans, including but not

limited to downpayments, maximum length of the plan, maximum payment per month toward arrears, minimum payment per month toward arrears.

- 1.35. Please provide a copy of all written documents, including tariffs, staff training manuals and staff "procedures" manuals, that describe and explain the basic administrative process a customer must "walk-through" in order to obtain a deferred payment arrangement. A response to this Data Request should contain a description of the process from the point of initial contact with the Company to the point where the Company and the customer document the agreement, including any process for supervisory review when a customer disagrees with the terms of the offered payment arrangement.
- 1.36. In Excel format, by month for each month October 2023 to the present inclusive, please provide:
  - a. The total number of active deferred payment arrangements in existence;
  - b. The number of new deferred payment arrangements entered into;
  - c. The number of deferred payment arrangements successfully completed each month;
  - d. The number of defaulted deferred payment arrangements;
  - e. The average term (in months) of deferred payment arrangements newly entered into;
  - f. The average remaining dollars of arrears at the time of default for defaulted payment arrangements.
  - g. The dollars of arrears subject to the payment agreement collected prior to the default.
  - h. The number of renegotiated DPAs newly entered into;
- 1.37. Please provide a detailed description of how payments by customers on deferred payment plans are applied to a customer's account when those payments exceed the bill for current service plus the payment plan installment. For example, is the amount of the excess payment applied to the next monthly bill or are those payments applied to the last due payment plan installment?
- 1.38. Please provide a copy of all forms, instructions, notices or other written materials of any nature provided to a customer setting forth the terms of their payment agreement.
- 1.39. Please provide a copy of all forms, instructions, notices or other written materials of any nature provided to a customer informing that customer that if he/she believes he/she cannot afford the payment agreement that has been offered, he/she has the right to appeal the payment agreement and/or to request a hearing to obtain an agreement to which they may be entitled.

- 1.40. Please provide a list of all policies establishing whether or not residential customers may or may not enter into a levelized monthly Budget Billing plan (e.g., customer must have been a customer for at least 12-months; customer may not be in arrears; etc.).
- 1.41. In Excel format, by month for each month since October 2023, please provide:
- a. The number of customers newly entering into Budget Billing;
  - b. The number of customers existing Budget Billing for any reason;
  - c. The number of customers removed from Budget Billing for nonpayment;
  - d. The number of active Budget Billing customers;
  - e. The number of Budget Billing customers with bill credits;
  - f. The average credit on a Budget Billing account with a bill credit;
  - g. The aggregate bill credits on accounts with a bill credit;
  - h. The number of Budget Billing customers with a bill balance;
  - i. The average balance on a Budget Billing account with a bill balance;
  - j. The aggregate bill balance on accounts with a bill balance;
  - k. The number of Budget Billing accounts who ended their annual Budget Billing period with a bill credit;
  - l. The average dollar amount of the year-end bill credits;
  - m. The number of Budget Billing accounts who ended their annual Budget Billing with a bill balance;
  - n. The average dollar amount of the year-end bill balances.
- 1.42. Please provide a copy of each internal operating procedure, if any, detailing how and under what circumstances intra-year modifications are made, if at all, to monthly budget billing amounts if a residential customer's monthly budget billing amount appears to be over- or under-collecting actual annual bills.
- 1.43. Please provide a detailed explanation of the procedures by which:
- a. The amount of a year-end underpayment is charged to a budget billing customer;
  - b. The amount of a year-end overpayment is refunded to a budget billing customer.
- 1.44. In Excel format, by month since October 2023 to the present inclusive, please provide the number of budget billing customers who entered the levelized budget billing plan with a pre-existing arrearage.
- 1.45. Please provide a detailed description of how the company knows whether a residential customer has a DER such as smart thermostats, solar, batteries, and electric vehicles that are subject to management by the company.
- 1.46. By zip code, as well as for each company as a whole, for the most recent data available, please provide the number of residential customers with:

- a. Rooftop solar interconnections;
  - b. Battery connections;
  - c. Smart thermostat connections;
  - d. Electric vehicle connections.
- 1.47. Please provide by month since October 2023), for the Company as a whole and by zip code:
- a. The number of disconnection notices for nonpayment issued to residential customers;
  - b. The number of residential nonpayment disconnections;
  - c. The number of residential reconnections (after a nonpayment disconnection);
  - d. The number of newly entered into deferred payment arrangements;
  - e. The number of active deferred payment arrangements;
  - f. The number of defaulted deferred payment arrangements;
  - g. The number of successfully completed deferred payment arrangements;
  - h. The average term (in months) of active deferred payment arrangements;
  - i. The average installment payment (in dollars) of active deferred payment arrangements;
  - j. The number of accounts having been charged late payment charges;
  - k. The dollars of late payment charges levied;
  - l. The number of accounts in arrears (not on payment arrangements);
  - m. The dollars of accounts in arrears (not on payment arrangements);
  - n. The average arrears at the time of a nonpayment disconnection;
- 1.48. Is the Company capable of producing annual load curves, showing hourly use, for customers disaggregated by:
- a. Residential customers;
  - b. LIHEAP recipients.
  - c. If “yes,” please provide such annual load curves for the two most recent years.
  - d. If two years are not available, provide such load curves as are available;
  - e. If not, why not?
- 1.49. Please provide all studies, evaluations or other written documents demonstrating that the energy use of LIHEAP recipients is reflective of the energy use of residential customers who are not receiving LIHEAP.
- 1.50. Please provide a copy of a typical residential notice of disconnection for nonpayment printed in each of the following months:
- a. August 2024.
  - b. November 2024;
  - c. January 2025;
  - d. April 2025.

- e. If more than one type of residential disconnection notice is issued, provide a copy of each.
- 1.51. Please provide a copy of a typical residential bill for each of the following months:
- a. August 2024 (bill with no arrears);
  - b. August 202 (bill with arrears);
  - c. November 2024 (bill with no arrears);
  - d. November 2024 (bill with arrears);
  - e. January 2025 (bill with no arrears);
  - f. January 2025 (bill with arrears);
  - g. April 2025 (bill with no arrears);
  - h. April 2025 (bill with arrears).
- 1.52. Please provide a copy of all reports, evaluations, memos, analyses or other written documents of any nature prepared since January 1, 2020, containing the Company methodology, procedure or process designed to systematically review, study or assess the Company residential billing and/or payment records in an effort to:
- a. Characterize patterns of nonpayment;
  - b. Identify the characteristics of nonpayers;
  - c. Identify predictors of nonpayment;
  - d. Identify strategies to reduce nonpayment;
  - e. Identify early indicators of nonpayment.
- 1.53. Please provide for the period January 1, 2020 to present:
- a. All written reports, evaluations, assessments, presentations, or other written document which identify metrics by which the Company measures whether electric bills are “affordable.”
  - b. All reports or other written documents collecting data on the metrics identified in the immediately preceding data request.
- 1.54. Please identify any documents, analyses or reports prepared by or for the Company since January 1, 2020, using Company-specific data, that indicates, evaluates or otherwise discusses the amount which residential arrears must reach in order for the Company to cost-effectively disconnect service due to the arrearage.
- 1.55. Please identify any documents, analyses or reports, not already identified in response to the request immediately above, produced since January 1, 2020, which is in the custody or control of the Company, regardless of whether the documents or information contained therein was prepared by or for the Company, that indicates, evaluates, discusses, concerns or addresses in any way the amount which residential arrears must reach in order for the Company to cost-effectively disconnect service due to the arrearage.



- 1.56. Please provide a single copy of any report, evaluation, study or other written document of any nature, within the custody or control of the Company, whether or not prepared by or for the Company, dated within the past five years, identifying, evaluating or otherwise discussing why nonpaying residential customers do not make contact with the utility when, in response to bill nonpayment, those nonpaying customers receive a request or notice to contact a utility to avoid the disconnection of service.
- 1.57. Please provide a single copy of any report, evaluation, study or other written document of any nature, within the custody or control of the Company, whether or not prepared by or for the Company, dated within the past five years, identifying, evaluating or otherwise discussing the effectiveness of written shutoff notices as a means to communicate information to residential customers in arrears.
- 1.58. Please provide a single copy of any report, evaluation, study or other written document of any nature, within the custody or control of the Company, whether or not prepared by or for the Company, dated within the past five years, identifying, evaluating or otherwise discussing why residential customers do not successfully complete deferred payment plans (sometimes known as payment agreements or other similar terms) in order to avoid the disconnection of service for nonpayment.
- 1.59. Please provide any and all price elasticity studies in the possession or control of the Company, whether or not done specifically for the Company, dated within the past five years, regarding long- and/or short-term price elasticities for the following:
- a. Residential customers as a whole;
  - b. Low-income residential customers;
  - c. Low-use residential customers, irrespective of income.
- 1.60. Please provide all written studies currently within the custody or control of the Company, whether or not prepared by or for the Company, dated within the past five years, that explicitly assess the extent to which the following activities reduce residential bad debt:
- a. Cash security deposits;
  - b. Deferred payment agreements;
  - c. Disconnections for nonpayment;
  - d. Late payment charges.
- 1.61. Please provide all written studies currently within the custody or control of the Company, whether or not prepared by or for the Company, dated within the past

five years, that explicitly assess the extent to which the following activities reduce residential arrears:

- a. Cash security deposits;
- b. Deferred payment agreements;
- c. Disconnections for nonpayment;
- d. Late payment charges.

1.62. Please provide all written studies currently within the custody or control of the Company, whether or not prepared by or for the Company, dated within the past five years, that explicitly assess the extent to which the following activities accelerate residential payments:

- a. Cash security deposits;
- b. Deferred payment agreements;
- c. Disconnections for nonpayment;
- d. Late payment charges.

1.63. By month since October 2023, please provide by zip code, as well as for the Company as a whole, (or other geographic identifier if zip codes are not available):

- a. The number of monthly bills that have been returned to the Company as undeliverable as addressed;
- b. The number of accounts for which bills were returned to the Company as undeliverable as addressed who were subsequently sent a notice of disconnection for nonpayment;
- c. The number of mailed notices of disconnection for nonpayment that were returned to the Company as undeliverable as addressed.

1.64. Please provide a detailed explanation of the process of notice disconnection for non-payment in those instances where:

- a. Bills are returned as undeliverable as addressed;
- b. Disconnection notices are returned as undeliverable as addressed.

1.65. Please provide a detailed description of the order in which LIHEAP payments are applied against residential accounts in the event that the LIHEAP benefit exceeds the bill for current service in the month the benefit is received:

- a. When the account has no arrearage balance in the month in which the benefit is received; and
- b. When the account has an arrearage balance in the month in which the benefit is received.

1.66. Assume that a residential account has an unpaid balance that is subject to a deferred payment agreement that is six months long. This residential account receives a LIHEAP benefit that exceeds the bill for current service plus the current payment agreement installment in the month the benefit is received.

Please provide a detailed description of how the balance of the LIHEAP benefit exceeding the bill for current service plus the current payment agreement installment is applied against future bills for current service and future payment agreement installments

- 1.67. Please provide all studies of the economic health of the Company service territory prepared by or for the Company within the past five years.
- 1.68. Please identify all metrics of economic health of the Company service territory tracked by the Company or used or reported by the Company within the past five years.
- 1.69. Please provide a single copy of all reports (analyses, memos, evaluations, or other written document) in which the Company utilized the metrics identified in the immediately preceding question within the past five years.
- 1.70. Please provide a single copy of all reports or discussions of the economic health of the Company service territory provided to Company management, Board or investors within the past five years.
- 1.71. Please identify all reports of the economic health of the Company service territory, prepared by a person or entity external to the Company, routinely relied on by the Company.
- 1.72. For all such reports identified in response to the immediately preceding question, please provide a single copy of each such report since January 2023.
- 1.73. Please provide for each year 2023 through present inclusive, copies of:
  - a. Each Company agenda identifying low-income issues as a separately-stated agenda item;
  - b. Each presentation or other set of materials to the company Board of Directors regarding low-income energy issues;
  - c. Each holding company Board of Directors agenda identifying low-income issues as a separately-stated agenda item;
  - d. Each set of presentation or other set of materials distributed to the holding company Board of Directors as part of the agenda item;
  - e. Each Company Board agenda identifying customer service and/or credit and collection issues as a separately stated agenda item;
  - f. Each presentation to the Company Board of Directors regarding customer service and/or credit and collection issues;
  - g. Each set of written materials regarding customer service and/or credit and collection issues distributed as part of the agenda item.

- 1.74. Please provide all studies, analyses, memos, workpapers, or written documents of any nature within the custody or control of the Company, prepared since January 1, 2020, that disaggregate the source of bad debt to the Company by the socio-economic status of the customer (for residential bad debt).
- 1.75. Please provide all studies, analyses, memos, workpapers, or written documents of any nature within the custody or control of the Company, prepared since January 1, 2020, that disaggregate the source of arrears to the Company by socio-economic status of the customer (for residential arrears);
- 1.76. Please provide all studies, analyses, evaluations or other written documents, that consider, examine or otherwise discuss racial disparities in the Company's service territory regarding:
- a. Nonpayment service disconnections;
  - b. Dollars in arrears;
  - c. Accounts in arrears;
  - d. Accounts on payment arrangements;
  - e. Accounts that have defaulted on payment arrangements;
  - f. Participation in low-income discounts
  - g. Receipt of federal fuel assistance.
- 1.77. Please provide a comprehensive list of the "grid challenges" referenced in the testimony of Waldrab, page 2, lines 4 – 7.
- 1.78. Please refer to the Direct Testimony of Peter W. Waldrab ("Waldrab Direct") at page 29 lines 9 through 15, and provide, in Excel format, by month for the most recent 24 months available, by zip code, as well as for the company as a whole:
- a. The number of DER applications disaggregated by the type of DER;
  - b. The number of solar interconnection applications.
- 1.79. Please refer to Waldrab Direct at page 31 line 19 through page 32 line 16. In Excel format, by month for the most recent 24 months available, provide by zip code, as well as for each company as a whole, the number of new electric vehicle connections.
- 1.80. Please refer to Waldrab Direct, page 39 line 16 through page 41 line 23. In Excel format, by month for the most recent 24 months available, provide by zip code, as well as for each company as a whole, :
- a. The number of residential accounts taking service under net metering;
  - b. The dollars of net metering credits provided.
- 1.81. Please refer to Exhibit PWW-3 at page 2 and provide by zip code, as well as for the company as a whole:
- a. The number of each "upsized" service transformer.

- b. The dollars invested in “upsized” service transformer.
- 1.82. Please refer to Exhibit PWW-3 at page 3 and provide a copy of each “locational analysis” of solar PV referenced.
- 1.83. Please refer to the Direct Testimony of Shannon L. Montgomery (“Montgomery Direct”) at page 6 lines 1 through 5, and provide in Excel format, by zip code, as well as for the company as a whole, for the most recent 24 months available, the number of participants in the Bring Your Own Device program.
- 1.84. Please refer to Montgomery Direct at page 6 lines 6 through 9, and provide in Excel format, by zip code, as well as for the company as a whole, for the most recent 24 months available:
- a. The number of customers participating in the Peak Time Rebates program;
  - b. The dollars of credits provided through the Peak time Rebates program.
- 1.85. Please refer to Montgomery Direct at page 7 line 11 through page 8 line 22 and provide in Excel format, by month for the most recent 24 months available:
- a. The dollars of customer contributions;
  - b. The dollars of shareholder match of customer contributions;
  - c. The dollars of shareholder contributions if different from the dollars of shareholder match.
- 1.86. Please refer to Montgomery Direct at page 20 and provide in Excel format, please provide a distribution of the 2,795 Solar Share participants by zip code, as well as for the company as a whole.
- 1.87. Please indicate the number of customers within each Solar Share Program option (One Time or Monthly), the number of shares purchased by each customer, and the rate class of each participating customer.
- 1.88. Please refer to the Direct Testimony of Timothy S. Lyons (“Lyons Direct”) at page 29 lines 2 through 4, and provide:
- a. A detailed description of all actions taken by the company to ensure that Solar Share does not shift costs to non-participating customers; and
  - b. A quantification of the dollars of costs retained within the Solar Share participant base.
- 1.89. Regarding the Solar Share Program Rider, please provide all workpapers with formulas intact used to determine the “One Time Solar Capacity Charge,” the “Monthly Solar Capacity Charge,” and the Solar Energy Credit.

- 1.90. Please provide for each of the most recent three years available, the IRS Form 990s for the Company's Foundation. If no Form 990 was filed, please provide an explanation of why no Form 990 was filed.
- 1.91. Please provide, for each of the most recent three years available, the annual reports for:
- KU's Winter Care program;
  - The Winterhelp Energy Assistance Fund.
- 1.92. In Excel format, please provide by year for 2023 and 2024, the following for each of the following: (1) LIHEAP; (2) LIHEAP Crisis; (3) HEA; (4) Winterhelp; (5) WE CARE; (6) FLEX:
- A list of the customers receiving assistance from each program (with all personally identifiable information redacted);
  - The dollars of arrears on the customer's account at the time the customer received such assistance;
  - The dollars of arrears on the customer's account four months after receiving such assistance; and
  - The dollars of arrears on the customer's account twelve months after receiving such assistance.
- 1.93. Please provide a list of the names and addresses of locations:
- Where a residential customer can currently make a cash payment toward his or her bill.
  - Where a residential customer can currently make a payment of other than cash toward his or her bill.
- 1.94. Please provide a list of the names and addresses of locations where a residential customer can walk in and make personal contact with a Company service representative that:
- Is capable of immediately responding to an inquiry about a residential bill; or
  - Can negotiate a deferred payment arrangement for an outstanding bill; or
  - Can negotiate a resolution to an outstanding shutoff for nonpayment; or
  - Can negotiate a service reconnection after a shutoff for nonpayment; or
  - Can provide assistance in referring to customer to LIHEAP; or
  - Can provide assistance in referring a customer to a Company-supported hardship fund.
- 1.95. For each office listed in response to the preceding data request, please provide the following:
- The actual number of Company personnel whose job it is to handle these walk-in customer contacts for each year for the past three years;
  - The budgeted number of Company personnel whose job it would be to handle these walk-in customer contacts for each year for the past three years;

- c. The current hours of staffed operation;
  - d. A list of changes in the hours of operation that have occurred since January 2022, including the date on which change was implemented.
  - e. The number of in-person contacts involving a deferred payment plan;
  - f. The number of in-person contacts made in response to a pending notice of a nonpayment disconnection;
  - g. The number of in-person contacts made seeking the reconnection of service;
  - h. The number of in-person contacts made inquiring about LIHEAP assistance.
- 1.96. Assuming the closure of field offices as proposed in this rate proceeding, please provide a list of all addresses and offices at which a person may have an in-person conversation regarding:
- a. An inquiry about a residential bill; or
  - b. The negotiation of a deferred payment arrangement for an outstanding bill; or
  - c. The negotiation of a resolution to an outstanding shutoff for nonpayment; or
  - d. The negotiation of a service reconnection after a shutoff for nonpayment; or
  - e. The referral of a customer to LIHEAP; or
  - f. The application by a customer to a Company-support hardship fund.
- 1.97. Please provide all customer satisfaction surveys prepared since January 1, 2022, which are specific to the Company's interactive voice response (IVR) or voice response unit (VRU) systems. Provide:
- a. The survey instrument specific to IVR and/or VRU systems;
  - b. The results of all surveys specific to IVR and/or VRU systems;
  - c. Any evaluation or assessment of the results of all surveys specific to IVR and/or VRU systems;
  - d. The means of selecting the persons to be surveyed specifically about IVR and/or VRU systems.
- 1.98. Please provide all customer satisfaction point-of-contact surveys for customers who made contact with the Company regarding a credit and collection issue for:
- a. Phone contact with a customer service representative;
  - b. In-person contact at a walk-in company office;
  - c. A phone contact made through an IVR and/or VRU system;
  - d. A web-based contact.
- 1.99. Please provide all customer satisfaction point-of-contact surveys for customers who made contact with the Company regarding the negotiation of a deferred payment arrangement for:
- a. Phone contact with a customer service representative;
  - b. In-person contact at a walk-in company office;
  - c. A phone contact made through an IVR and/or VRU system;
  - d. A web-based contact.

- 1.100. Please provide the following information regarding the Company's NMS-1 & NMS-2 customer-generators, for each year from 2018 through 2024. For all requests below that result in a data response, please provide the data in Excel spreadsheet format with formulas intact and cells unlocked.
- a. For each month and year, how many kWh of excess generation ("Received or Rcvd" kWh) were supplied back to the Companies from all Net Metering ("NMS") customers? Provide the aggregate amount for each month and year of total received "Rcvd" kWh by rate class.
  - b. For each month and year, how many kWh of energy produced by the Companies ("Delivered" or "Dlvd") were used by all NMS customers? Provide the aggregate amount for each month and year of total delivered "Dlvd" kWh by rate class.
  - c. For purposes of this question and the proposed tariff, please explain whether the Companies define "excess generation" on an hourly, daily, or billing period basis, or if none of these, explain how the Companies define and measure "excess generation."
  - d. List the number of residential and commercial customers taking NMS service. List the number by each specific tariff.
  - e. List the total installed generation capacity (AC and DC) for customers receiving NMS by each specific tariff.
  - f. For each NMS customer, without divulging customer identity or geographic location, please list the capacity (system size in KW) of their Distributed Generation System, the technology type of that system (e.g. photovoltaic, wind, hydro, biomass), and the date of interconnected operation, and the rate class. List the total amount of kWh delivered to the grid from each NMS customer in each month.
  - g. What was the total combined capacity by rate class of all NMS customers, all residential NMS customers, and all commercial NMS customers for each year?
  - h. What percentage of the Company's single hour peak load for the previous year did the aggregate NMS customer generation represent for each year?
  - i. Please provide any additional data concerning net metering or generation from NMS customers for the years 2018 through 2024 which the Company has reported to the US Energy Information Administration, FERC, the Kentucky Energy and Environment Cabinet, or any other regulatory agency. This includes but is not limited to data filed on Form EIA-861 for each of those years.
  - j. For each NMS customer, please provide the monthly and annual energy consumption data for the year prior to the interconnected operation of the customer generation system. If this data is not available, please explain why not.
  - k. For each new NMS account in the years 2021, 2022, 2023, and 2024, provide the name of the installation contractor(s) identified on the customer's net metering application.



- 1.101. Please refer to Exhibit CRS-6, entitled “2026-2027 Qualifying Facilities Rates & Net Metering Service-2 Bill Credit.” Please provide all supporting workpapers in native format with formulas intact and cells unlocked.
- 1.102. Please refer to Order, *In the Matter of Electronic Application of Kentucky Utilities Company for an Adjustment of Its Electric Rates, a Certificate of Public Convenience and Necessity to Deploy Advanced Metering Infrastructure, Approval of Certain Regulatory and Accounting Treatments, and Establishment of a One-Year Surcredit*, Case No. 2020-00349.
- a. In the present application, please explain how each of the guiding principles developed by the Commission in Kentucky Power Company Case No. 2020-00174, and reiterated in the Commission’s Order in Case No. 2020-00249 were addressed and incorporated into the formulation of each of the proposed tariffs. See Order at 41-42.
  - b. Please explain which of the components of the Commission’s Avoided Cost Rate Calculation were updated in this filing, and the basis and formulae for how each was calculated. Provide all supporting workpapers in native format with formulas intact and cells unlocked for the calculation and formulation of:
    - i. Avoided energy cost
    - ii. Avoided generation capacity cost
    - iii. Avoided transmission capacity cost
    - iv. Avoided distribution capacity cost
    - v. Avoided ancillary services cost
    - vi. Avoided carbon cost
    - vii. Avoided environmental compliance cost, and
    - viii. Jobs benefits.
- 1.103. Please provide a breakdown by category of each component of costs included in the Company’s avoided cost calculations, and the methodology and data on which the cost was calculated and assigned. Please provide a comparison of the current costs for each category with the assumed avoided costs in 2020-00349 and 00350, and explain the basis or bases for the increase or decrease in costs.
- 1.104. For the last two years (2023 and 2024), please provide the following:
- a. The Companies’ load profile for each of the last two years, expressed in 15-minute intervals.
  - b. A profile of the Companies’ cost of generation in each 15-minute interval, or in the shortest time interval for which data is available.
  - c. A breakdown of how the Company’s cost of power changes over the course of each day for each month of the year.
  - d. The Companies’ cost of power during off-peak and peak demand times for each month (including all energy, demand, and transmission charges).

- e. Identify what resources the Companies called on to meet peak demand each month (including market purchases, if applicable).
- 1.105. Has the Company performed cost of service analysis on net metering customers? Please explain whether and how net metering customers cost more or less to serve than non-net metering customers. If the Company has not performed cost of service analysis on net metering customers, how has the Company determined that its proposed net metering tariff changes adhere to the principle of cost causation, i.e. that customers are fairly allocated the costs to serve them. Please provide copies of any and all such studies.
- 1.106. Has the Company performed any studies or analysis of the impact distributed energy resources could have or has had on their distribution grid, to reduce or defer infrastructure investments, or to improve system reliability or resilience for customers? Is the Company aware of any such studies performed by other parties in other regions or utility territories? Please provide copies of any such studies or analysis.
- 1.107. Is it the Companies' intention that the proposed NMS-2 rates will apply to all NMS-2 customers whose generators began service after September 24, 2021?
- a. If so, will NMS-2 customers who began taking service between September 24, 2021 and May 30, 2025 see their dollar-denominated bill credit drop to \$0.03859/kWh?
  - b. If not, please explain.
- 1.108. Please refer to the proposed NMS-2 tariff which states: "Consistent with KRS 278.466(1), Company will cease offering service Rider NMS-2 to any new Customer-generator after: (A) the cumulative generating capacity of NMS-1 and NMS-2 Customer-generators reaches a combined one percent (1%) of Company's single hour peak load during a calendar year; and (B) Company receives Commission approval to do so."
- a. What is the Companies' best estimate of when the 1% threshold will be reached?
  - b. After reaching 1%, if the Commission approves the Companies ceasing to offer NMS-2 service, what options will be available to customers who wish to install solar or other generating equipment?
- 1.109. Please refer to the Companies' SQF and LQF tariffs, which states: "Company hereby permits Seller to operate its generating facilities in parallel with Company's system." Please confirm whether:
- a. SQF and LQF customers allowed to consume their on-site generation behind the meter.
  - b. If more energy is generated than needed on site, the Company will purchase the excess generation at the rates defined in the SQF and LQF tariffs.

- 1.110. Please provide working Excel models of the Company's class cost of service studies developed for this rate case.
- 1.111. Please provide all cost of service workpapers in native electronic format, including any and all linked data and working files.
- 1.112. Please provide the FERC decisions authorizing the revenue requirements for the transmission systems for LG&E and KU since 2010.
- 1.113. Please provide a list by year of all new generation units larger than 1 MW built and installed in the service territories of LG&E and KU since 2010. Please note whether that generation is owned by LG&E or KU or an affiliate, or by a third party, and the generation technology and fuel/energy source for each.
- 1.114. Please provide a list of all new power purchase agreements by year signed by LG&E and KU since 2010. Please note the generation technology and fuel/energy source for each.
- 1.115. Please provide the historic peak demands by utility for LG&E and KU since 2010.
- 1.116. Please provide the historic energy sales by utility for LG&E and KU since 2010.
- 1.117. Please provide all historic environmental compliance costs recorded by utility by year for LG&E and KU since 2010.
- 1.118. Please provide all historic operational cost data for all utility owned generation by plant since 2010 separated by 1) fuel 2) maintenance 3) capital replacement and 4) environmental compliance.
- 1.119. Please specify the fuel or energy source for all utility owned generation for each plant by year since 2010.
- 1.120. Please provide amount of fuel or energy source consumed in MMBtus for all utility owned generation for each plant by year since 2010. (EIA filings made by the utility are sufficient.)
- 1.121. Please provide historic annual generation for all utility owned generation for each plant by year since 2010. (EIA filings made by the utility are sufficient.)
- 1.122. Please provide the Integrated Resource Plans for LG&E and KU applicable to this rate case.

- 1.123. In developing the load forecasts for that IRP, is that forecast developed from the utilities' historic metered loads?
- 1.124. In developing the load forecasts for that IRP, is a forecast of output from rooftop solar resources subtracted from the forecast or is the added generation included as an additional generation resource?
- 1.125. In preparing the generation resource plan for the IRP, is the rooftop solar generation included as a generation resource?
- 1.126. In preparing the generation resource plan for the IRP, is the planning reserve margin set based on the metered customer load? What is the planning reserve margin?
- 1.127. In operating the generation and transmission system, does LG&E use the NERC recommended 7% operational reserve margin? Does KU use the NERC recommended 7% operational reserve margin?
- 1.128. In operating the generation and transmission system, do LG&E and KU use the customer metered load as the benchmark for the operational reserve margin? If not, what adjustments do LG&E and KU make to set the benchmark?
- 1.129. Do LG&E and KU make any adjustments to the operational reserve margin for the presence of rooftop solar generation?
- 1.130. Do LG&E and KU make any adjustments to the operational reserve margin for other self-generation resources such as cogeneration? If so, is there a generation unit capacity size used as a criterion as inclusion in either the generation portfolio or as an adjustment to the benchmark used for establishing the operational reserve margin?
- 1.131. Do LG&E or KU have data on the geographic location of installed rooftop solar capacity in each of their service territories? If so, do LG&E or KU have data on installed rooftop solar capacity by distribution circuit? If so, please provide data on installed rooftop solar capacity by distribution circuit.
- 1.132. Do LG&E or KU make use of a margin of error in estimating the amount of distribution capacity needed on each circuit? Does LG&E or KU use a margin of excess distribution capacity on each circuit to determine if new investment is required to increase that capacity?
- 1.133. Do LG&E or KU have load usage data for each distribution circuit? If so please provide the load usage data for each distribution circuit since 2010.

- 1.134. Do LG&E or KU have load forecasts for each distribution circuit? If so please provide the load forecasts for each distribution circuit.
- 1.135. Please refer to the Direct Testimony of Charles R. Schram, p. 9, footnote 7, stating that the Companies no longer anticipate KU will reach the 1% level of its single-hour peak load in 2026.
- a. Produce all studies, analyses, workpapers, or other documents prepared by or relied on by the Companies to determine when each Company will reach the 1% level.
  - b. Explain when the Companies anticipate reaching the 1% level in the KU service territory.
  - c. Explain what is meant by an “updated understanding of the timing of the Solar for All program in Kentucky.”
- 1.136. Please refer to the Direct Testimony of Charles R. Schram, p.10, lines 1-4. Please provide all studies, analyses, workpapers, or other documents prepared by or relied on by the Companies that support the statement that “customers who do install solar will install relatively smaller systems.”
- 1.137. Please refer to the Direct Testimony of Charles R. Schram, p. 10, lines 4-7, stating that “for the forecasted test period, the reduced distributed generation capacity addition rate resulting from assuming the Companies will cease offering Rider NMS-2 service to new net metering customers after reaching the 1% level does not materially impact forecasted sales.” Have the Companies separately forecasted continuing to offer Rider NMS-2 beyond the 1% level? If so, please provide all supporting workpapers in native format with formulas intact and cells unlocked. If not, please explain why not.
- 1.138. Please refer to the Direct Testimony of Charles R. Schram, p.10, lines 12-16. Please provide all studies, analyses, workpapers, or other documents prepared by or relied on by the Companies that support the statement that “batteries have not proven to be particularly attractive to the Companies’ customers to date.”
- 1.139. Please refer to the Direct Testimony of Peter W. Waldrab, p. 5, lines 10-21. For each Company, and each of the years 2019-2023, please identify the SAIDI, SAIFI, and CAIDI including Major Storms/Major Events.
- 1.140. Please refer to the Direct Testimony of Peter W. Waldrab, p. 9, lines 12-17. Please provide a list of all Major Event Days (“MEDs”) from 2020 to present during which the Companies have experienced outages or other interruptions in service.
- 1.141. Please refer to the Direct Testimony of Peter W. Waldrab, p. 11, lines 4-13, stating that “Beginning in 2023, prompted by the occurrence of a number of

significant severe weather events like those described above, the Companies undertook to study their design standards to determine whether those standards were appropriate.”

- a. Produce all studies, reports, sources, and documents relied upon in reaching the conclusion that the Companies’ NESC design criteria for electric distribution facilities were no longer appropriate.
- b. Produce the Companies’ most recently completed study of its distribution design standards.

- 1.142. Please refer to the Direct Testimony of Peter W. Waldrab, p. 11, line 22 to p. 12, line 2. Please explain what “new and innovative methods” the Companies applied “to assess the costs and benefits of improvements to distribution infrastructure to guide their investment strategy and improve all-in reliability.”
- 1.143. Please refer to the Company’s Application, p. 10, para. 16. Please explain further what is meant by the statement that “the United States has experienced high levels of inflation, which has increased costs for all enterprises, yet the request in this case is less than those inflation levels.”
- 1.144. Please refer to the Company’s Application, p. 14, para. 26. Please explain further what is meant by the statement that the Company “seeks the approval of this clause to eliminate questions about cost recovery for such PPAs from PPA-approval proceedings.” Specifically, what questions does the Company seek to “eliminate”?
- 1.145. Please define the Company’s “reasonable operating expenses” as referenced in paragraph 14 of the Company’s Application.
  - a. What is considered a reasonable level of operating activity for the Company, and how is this determined?
  - b. What is the Company’s current authorized rate of return, and what level of rate of return is the Company seeking through this Application?
  - c. How does the Company intend to allocate or utilize any additional profit resulting from the proposed increase in rates?
- 1.146. The Company outlines the following planned investments in paragraph 15 of the Application: \$1 billion in transmission upgrades, \$700 million in non-mechanism generation capital, \$500 million in IT infrastructure, and \$350 million in AMI infrastructure. Please clarify the following:
  - a. Please further define and explain what types of projects fall under non-mechanism generation capital.
  - b. Are these investments in addition to the roughly \$3.7 billion in new infrastructure proposed in Case No. 2025-00045?

- 1.147. Given the level of proposed investment, what measurable improvements in grid stability does the Company anticipate, and how will those improvements be assessed or quantified?
- 1.148. In light of the proposed cost increases, has the Company assessed the potential increase in demand for its WeCare program? What preparations—if any—has the Company made to support a larger number of WeCare applicants?
- 1.149. Given the anticipated increase in disconnections due to higher rates and the widespread deployment of AMI, would the Company consider waiving reconnection fees?
- 1.150. Relating to the Company's closure of its in-person customer service offices, please respond to the following questions:
- a. How many customers per month during the period since offices began closing paid via third-party vendors?
  - b. What amount was paid by those customers in additional fees, both on a per-customer and total basis?
  - c. What part of any such fees were paid to the vendors?
  - d. What part of any such fees were paid to the Company?
  - e. Does the Company have any plans to reimburse customers for these third-party transaction fees, or to otherwise mitigate the financial burden this change has caused since 2017?
  - f. Please provide a breakdown of all customers paying at in-person offices in the year prior to closure, by zip code.
  - g. How many customers per zip code paid third-party transaction fees to pay for their utility bill.
  - h. Please provide a comprehensive list of all third-party vendors utilized, along with corresponding total payment data, to determine where payments have been directed.
  - i. Please provide detailed data on all fees paid by ratepayers on a monthly basis since the inception of third-party fee collection.
- 1.151. Please describe, and provide complete and detailed documentation on, all current low-income or income-eligible programs that the Company currently operates relating to energy efficiency and renewable energy, including, but not limited to, the name of the program, annual budget, the customer segment to which the program applies, the number of participating customers, and the applicable tariff sheets. Please include information for any programs that have been provided in the past 5 years. Please provide information for any programs currently planned and/or in development for the future.

- 1.152. Please provide all data on the energy savings achieved to date through the Company's AMI program. How does the company measure and verify these savings?
- 1.153. Please provide an update on the status of the AMI rollout and what date the transition to AMI meters will be complete.
- 1.154. Please identify all services and benefits customers presently receive from AMI meters.
- For each service or benefit, indicate the number of customers actively participating in that service, where applicable.
  - For each service or benefit, explain if and how the AMI meter enables customers to reduce their utility costs.
  - Have the Companies' modeled the expected bill savings customers will receive through AMI meters? Please provide all studies and associated workpapers.
- 1.155. Please identify all services and benefits the Companies plan to provide in the future to customers utilizing AMI technology, including:
- The number of customers expected to participate in each service,
  - The dates when these services will become available,
  - The cost to participate in the said program or service (if a participation cost is required).
- 1.156. Please provide all analysis the Companies have prepared of the costs and benefits to the Companies associated with the AMI deployment. Include all workpapers with formulas intact.
- 1.157. Has the Company conducted a comprehensive evaluation of alternative solutions such as energy efficiency measures, renewable energy options, energy efficiency programs, and Regional Transmission Organization ("RTO") participation prior to proposing a rate increase?
- Please explain why RTO involvement is not being considered as part of the Company's strategy.
- 1.158. Given the upward trajectory of residential rates, how does the Company plan to ensure that rates remain fair, just, and reasonable for customers?
- 1.159. Please provide all workpapers, analyses, studies and other documents supporting the following proposed Extremely High Load Factor Service ("ELHF") rate provisions:



- a. Minimum demand charge ratchet;
  - b. Minimum contract length;
  - c. Changes to contract capacity;
  - d. Termination of contract and exit fee;
  - e. Collateral requirements; and
  - f. All other EHLF rate provisions.
- 1.160. Please identify which EHLF rate provisions would apply during a new customer's load ramp period.
- 1.161. Please provide any model contract language (including an entire model contract if one exists) that the Company plans to use for EHLF customers.
- 1.162. Please provide all studies, analysis, and workpapers related to the following EHLF thresholds:
- a. A contract capacity greater than 100 MVA; and
  - b. An expected average monthly load factor above 85%.
- 1.163. Please explain how the Company plans to determine an EHLF customer's expected average monthly load factor.
- 1.164. For each potential data center customer in the Company's economic development queue, provide the potential customer's anticipated:
- a. Contract capacity; and
  - b. Expected average monthly load factor.
- 1.165. Identify by state and utility each specific utility tariff or rate that the Company reviewed when developing its draft EHLF provisions.
- 1.166. Did the Company consider including provisions in its EHLF rate addressing the length and ramp rate of a new customer's load ramp period? If so, please explain the basis for not addressing such issues in the proposed tariff revisions. If not, please explain why not.
- 1.167. Did the Company consider including provisions in its EHLF rate addressing EHLF customers participating in demand response or to interrupt load (e.g., size of interruptible load, notice of planned interruption, duration of interruption, and maximum hours of interruption per year)? If so, please explain the basis for not addressing such issues in the proposed EHLF rate. If not, please explain why not.
- 1.168. Did the Company consider including provisions in its EHLF rate addressing clean or renewable energy resources? If so, please explain the basis for not

addressing such issues in the proposed tariff revisions. If not, please explain why not.

- 1.169. Did the Company consider including provisions in its EHLF rate addressing contributions in aid of construction for upgrades to transmission, distribution, and/or generation resources? If so, please explain the basis for not addressing such issues in the proposed tariff revisions. If not, please explain why not.
- 1.170. Please provide all analyses and studies, along with all workpapers, conducted by or at the direction of the Company to analyze the potential impact(s) of EHLF customers on the following. To the extent that separate analyses exist for data center customers rather than EHLF customers, please provide those as well.
- The Company's revenue;
  - The Company's expenses;
  - The Company's net income or profit;
  - The Company's cost of service study results, including cost allocation to customer classes;
  - Cost-shifting or cross-subsidization among customer classes; and
  - Residential rate or bill impacts.
- 1.171. Has the Company studied the load shape of data center or EHLF customers being served by other utilities? If not, please explain why not. If yes, please provide the results of such studies, along with all workpapers and documentation.
- Has the Company taken any other steps to evaluate the potential load shape of data center or EHLF customers? If not, explain why not. If yes, please provide the results of such evaluations, along with all workpapers and documentation.
- 1.172. Please identify each type of cost associated with interconnecting a new EHLF customer.
- For each type of cost, please identify whether it is directly assigned to the prospective customer load.
  - Please describe and identify the range of total interconnection costs for a prospective new EHLF customer.
- 1.173. Please identify each type of cost associated with building and interconnecting new energy resources to serve new EHLF customers.
- For each type of cost, please identify if there is any circumstance under which the cost is directly assigned to the prospective EHLF customer.
  - Please describe and identify the range of total new energy resources costs for a prospective EHLF customer.

- 1.174. Does the Company expect EHLF customers to take service at distribution voltage? If yes, what proportion of those customers might take service from the distribution system? How will the Company determine if those customers take service on the distribution system?
- 1.175. Does the Company anticipate needing additional power supply resources to serve EHLF customers beyond those proposed in Case No. 2025-00045?
- a. If yes, please identify the additional power supply resources the Company anticipates needing to serve EHLF customers.

[Signature on next page]

Respectfully Submitted,



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*Kentuckians for the Commonwealth,*

*Kentucky Solar Energy Society, and*

*Mountain Association*

### **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 July 03, 2025; 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