

**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)	

**SUPPLEMENTAL 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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Dated: July 31, 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.

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 Intervenor 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 Intervenor 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 DATA REQUESTS PROPOUNDED TO
KENTUCKY UTILITIES COMPANY BY JOINT
INTERVENORS

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

- 1.1. Please refer to the Company's response to Sierra Club Request 1-6 and confirm whether the Company evaluated the Kentucky Power Company's revisions to Tariff I.G.S. as approved in Case No. 2024-00305 prior to filing its application in this proceeding. If the Company did not evaluate the Kentucky Power Company's revisions to Tariff I.G.S prior to filing its application in this proceeding, confirm whether the Company has since evaluated the referenced Tariff I.G.S. revisions.
- 1.2. Please explain the process that would apply for an EHLF rate customer to continue taking service under the EHLF rate after the customer's Initial Contract Term. For instance, would the customer extend its initial contract or sign a separate contract with a new Initial Contract Term?
 - a. Please also explain what proposed provisions under the EHLF rate would apply to a customer continuing to take service under the EHLF rate after the customer's Initial Contract Term.
 - b. Please refer to the Company's response to Staff Request 2-6. If a customer continues taking service under the EHLF rate after the Initial Contract Term, clarify whether and how the exit fee requirement would apply upon early termination of any extended or additional contract under the EHLF rate. To the extent that the Company proposes that the exit fee requirement would not apply in such a scenario, provide the Company's basis for the Company's proposal.
- 1.3. In the case of multi-tenant data center developments, also known as colocated data centers, please explain which entity or entities the Company would expect to enter into an Electric Service Agreement utilizing the EHLF rate. For example, in the case of Poe Companies and PowerHouse Data Centers' possible data center development, would the Company expect that either or both project developers (Poe Companies and/or PowerHouse) would execute Electric Service Agreement(s) for the entire facility (at 100% of the requested service level), or would the Company expect that each individual tenant of a multi-tenant data center development would separately execute an Electric Service Agreement utilizing the EHLF rate?

- a. If the Company expects that, in the case of multi-tenant data center facilities, “the customer” would be the facility developer(s) or owner(s), please state whether that could impact the ability of an individual tenant at that facility to:
 - i. Participate in a Company-sponsored demand-side management program;
 - ii. Own and operate qualifying facilities;
 - iii. Enroll in the Company’s Green Tariff options;
 - iv. Participate in the Company’s Solar Share Program.
 - b. For each of the four activities specified in subpart (a) where the Company answers in the affirmative, please also identify and explain each possible impact to the individual tenant if the Company’s direct “customer” was the facility developer(s) or owner(s).
- 1.4. Please refer to the Company’s response to Joint Intervenor Request 1.163, which states that “[t]he customer will supply the Company with the expected average monthly load factor based on estimated future demand and energy needs.” Please explain who the Company would expect “the customer” to be in the case of a multi-tenant data center facility (i.e., would the owner or developer of a multi-tenant data center facility, or each individual tenant, be “the customer” supplying expected average monthly load factor).
- 1.5. Refer to the Company’s response to Joint Intervenor Request 1.166, which states that “[t]he Company will manage customers’ ramp-up periods by implementing minimum billing and provisions outlined in the Electric Service Agreement, effective from the agreement’s ramp schedule commencement dates. This is to allow flexibility between customer projects that could vary in size and complexity.”
- a. Please provide the Company’s anticipated range of potential ramp-up period lengths and ramp rates, along with the anticipated range of potential minimum billing that would apply during ramp-up periods, for customers under the EHLF rate.
 - b. Please explain each of the ways in which the Company believes that EHLF rate customer projects will vary in complexity.
 - c. Please explain whether the Company would expect a multi-tenant data center facility to share a single ramp schedule, or would each individual tenant need or prefer its own distinct ramp schedule.

- d. Explain in detail the “minimum billing and provisions” referenced in your response that would apply during the ramp-up periods.
 - e. Identify and produce any model or proposed version of the Electric Service Agreement referenced in your response.
- 1.6. Please refer to Joint Intervenor Request 1-170(a). To the extent not already produced, please explain all assumptions used for the provided revenue analysis for a hypothetical 402 MW customer.
- a. Please also confirm that the Company has not produced any analysis regarding expenses to serve this hypothetical 402 MW customer or net income or profit related to the hypothetical customer. To the extent not confirmed, produce that analysis and all associated workpapers, inputs, and assumptions.
- 1.7. Please refer to the Company’s response to Joint Intervenor Requests 1.170(b) (stating that no analysis of EHLF customers’ possible impact to the Company’s expenses has been performed) and 1.159(f) (stating that “EHLF rate was created to be revenue neutral with the RTS rate by consolidating RTS time-of-day demand rates into a single rate,” *inter alia*).
- a. Please explain the intended meaning of “revenue neutral with the RTS rate” as used in response to Joint Intervenor Request 1.159(f).
 - b. If the Company has not undertaken a study of the expenses it would undertake to serve an EHLF rate eligible customer, please explain the Companies’ empirical basis for determining that rate EHLF should be designed to be revenue neutral with respect to the RTS rate.
- 1.8. Refer to the Direct Testimony of Michael Hornung at p. 4 lines 8-19. State whether the Company will require all new customers with a contract capacity greater than 100 MVA and an average monthly load factor above 85% to take service under rate EHLF. If not:
- a. Explain why not.
 - b. Identify what other types of rates or special contracts such customers could be allowed to take service under.
 - c. State whether the Company will commit to ensuring that at least the same level of protections for other customers as are provided under rate EHLF will apply to such new customers that are not required to take service under rate EHLF. If so, how would such level of protections be achieved?
- 1.9. Refer to the Direct Testimony of Michael Hornung at p. 7 lines 14-19.

- a. Explain in detail the basis for setting the minimum demand charge ratchet at 80% of contract capacity, instead of a higher percent such as 85 or 90 including production of supporting workpapers, if any.
 - b. Explain in detail the basis for setting the required contract term at 15 years, instead of a higher length such as 20 years, including production of supporting workpapers, if any.
- 1.10. Refer to your response to Joint Intervenor Request 1.160. State whether the 15-year contract term for EHLF customers includes the load ramp period.
 - a. If so, identify the maximum length of such ramp period that would be allowed.
 - b. If not, identify and explain what terms and conditions of service would apply to the customer during the ramp period.
- 1.11. Refer to your response to Direct Testimony of Michael Hornung at p. 7 lines 19-23.
 - a. Explain how the “more than \$100 million” collateral amount was calculated, and produce any workpapers used in such calculation.
 - b. Explain how the “about \$1.1 billion” 15-year minimum demand charge obligation was calculated, and produce any workpapers used in calculating that amount.
- 1.12. Refer to your response to LFUCG Request 1.53. State whether the Company has taken steps to inform potential EHLF customers of the opportunity to participate in the Solar Share Program.
 - a. If so, identify each such step that the Company has taken and produce any documentation of the same.
 - b. If not, explain why not.
- 1.13. Refer to the proposed EHLF tariff at p. 35 of Attachment to Filing Requirement Tab 4, and to 55-2025_JI_DR1_KU_Attach_to_Q170a_-_Data_Center_Rev_Analysis.
 - a. State whether the Capacity Reduction Fee identified in the proposed EHLF tariff could be calculated for the hypothetical 402 MW customer from the data provided in the referenced attachment produced in response to Joint Intervenor Request 1.170(a).
 - i. If so, identify each column of data from the attachment that would be included in calculating that Fee.

- ii. If not, identify what the Fee would be for the hypothetical 402 MW customer and explain how that Fee was calculated.
 - b. State whether the Exit Fee identified in the proposed ELHF tariff could be calculated for the hypothetical 402 MW customer from the data provided in the referenced attachment produced in response to Joint Intervenor Request 1.170(a)
 - i. If so, identify each column of data from the attachment that would be included in calculating that Exit Fee.
 - ii. If not, identify what the Exit Fee would be for the hypothetical 402 MW customer, and explain how that Exit Fee was calculated.
 - c. Explain what each of the numbers in row 3, columns M through U of the referenced attachment produced in response to Joint Intervenor Request 1.170(a) represent, and explain how they were calculated.
- 1.14. Please refer to the Company's tariff sheets in Tab 4 of the initial filing, and specifically Sheet 6, RTOD-Energy, and:
- a. Explain how the Company determined the "Off-Peak" and "On-Peak" hours for both the "Summer Months" and "All Other Months";
 - b. Provide any supporting documentation or analysis, including workpapers in native machine-readable format.
- 1.15. State whether any standard or model Electric Service Agreement for EHLF customers has been created. If so, produce the same. If not, identify when the Company anticipates creating such standard or model agreement.
- 1.16. Please refer to the Company's tariff sheets in Tab 4 of the initial filing, and specifically Sheet 7, RTOD-Demand, and:
- a. Explain how the Company determined the "Peak" hours for both the "Summer Months" and "All Other Months";
 - b. Provide any supporting documentation or analysis, including workpapers in native machine-readable format.
- 1.17. Please refer to Company's response to Joint Intervenor Request 1-53, and respond to the following:
- a. Do the companies acknowledge that affordability of rates is not only a function of the electricity rate, but also of customer ability to pay, for example,

residential customer income level or revenue expectations of commercial and industrial customers? If not, please explain why not.

- b. Is the Company aware Kentucky household income falls below the national median income?¹
- 1.18. Please refer to Hornung Direct, page 18-19. How do the companies square the decision to exclude jobs benefits in net metering rate calculations with the Commission's Sept. 24, 2021 *Order* in Case Nos. 2020-00349 and 2020-00350 at pages 57-58: "The Commission directs LG&E/KU to evaluate job benefits and economic development as an export rate component for LG&E/KU's next rate case filing"?
- 1.19. Please refer to the Company's responses to JI 1-74 and 75, stating "The Company does not have a business reason to maintain data in regards to the socio-economic status of the customer." Given the Company is granted a monopoly to provide an essential public service, do they not believe that to fulfill that obligation to all customers, they should make reasonable efforts to understand the basis for non-payment of bills?
- 1.20. Refer to the response to JI 1-107, which confirms that if approved, the Company's proposed NMS-2 rates will apply for existing NMS-2 customers whose generators began service after September 24, 2021, resulting in those customers seeing their dollar-denominated bill credit drop from \$0.07534/kWh to \$0.03859/kWh.
- a. Please explain how, in the Company's view, this roughly 48% reduction in the dollar-denominated bill credit is consistent with the principle of gradualism.
- b. Please explain how, in the Company's view, this roughly 48% reduction in the dollar-denominated bill credit for existing NMS-2 customers is consistent with the public interest in affording reasonable certainty regarding an ensured rate of return for customer-generators' investments?
- 1.21. Please refer to the response to JI 1-93–96, and respond to the following requests:
- a. State the actual total number of Company live agents
- b. Specify the typical number of live agents available each day of the week on an hourly or shift basis (if provided on a shift basis, please specify how shifts are structured each day of a typical week as part of your response).
- c. Are Company live agents equipped to answer all inquiries related to LIHEAP assistance, reconnection services, notices of disconnection, payment plans, WeCare program offerings, etc.? Please explain.

¹ See, e.g., <https://worldpopulationreview.com/state-rankings/median-household-income-by-state>.

1.22. Regarding closure of the Company's offices:

- a. Please provide the number of customer calls to the Company on a monthly basis from January 2022 to June 2025, or the most recent month available.
- b. Please provide the actual and projected expenses avoided by closing physical office locations.
- c. Please explain whether and how the expenses identified in response to subpart (b) have been reallocated? In your response, please specify each investment made in digital infrastructure, staffing, customer service enhancements, or outreach programs.
- d. Since the closures, have you expanded your live agent workforce? If so, what is the percentage increase in live agent staffing compared to pre-closure levels?
- e. What is the current average response time for email and phone inquiries for the live agents?
- f. For individuals without access to a phone or internet services, what alternative methods are available to obtain information or receive assistance?
- g. Please list the available payment methods for bill payment at third party locations.
- h. Confirm if third party locations accept the Healthy Benefits+ Medicaid card for energy bill payment.

1.23. Please refer to the Company's response to JI 1-150, and respond to the following:

- a. Are third party vendors equipped to answer questions related to LIHEAP assistance, reconnection services, notices of disconnection, payment plans, WeCare program offerings, etc.?
- b. The Company proposes in this base rate case to "cover the cost of cash payments after this rate case if approved". How does the proposal address the service gap left by the closure of in-person offices, particularly for customers who prefer or require face-to-face communication for account resolution, program enrollment, or billing questions?
- c. If the Company states that it has no control over third-party payment processing fees, how is it proposing to waive those fees under the current rate case? Please clarify the mechanism by which the Company would absorb or offset these fees, despite indicating they are set and collected by an independent third-party vendor.
- d. According to available figures in the Company's response, third-party vendors collected \$709,653.75 in fees at a rate of \$1.95 per transaction, indicating a

minimum of approximately 363,925 transactions between April 2023 and May 2025. According to provided records, third party transactions increased in both 2024 and 2025 compared to the same periods in 2023.

- i. Does the amount of transactions demonstrate ongoing demand for in-person or assisted payment options? Please explain why or why not, and supporting analysis for the Company's view(s), if any.
- ii. Has the Company evaluated whether opening an in-person office is warranted to meet customer needs, particularly for those facing digital or financial barriers? If so, please describe each such evaluation process (or methodology), including timing and individuals involved, and produce related reports, studies, memoranda, meeting minutes or other documentation of evaluation process, progress, outcomes, and next steps, if any.
- iii. Given that third-party payment processing fees (e.g., \$1.95 per transaction) are paid by customers in order to remit payment to the utility, does the Company consider these fees to be functionally equivalent to a rate increase for affected customers? Please explain the Company's view.
- iv. If these charges are a condition of paying in person, should they not be subject to Public Service Commission approval? Please explain the Company's view on why or why not.

1.24. Please answer the following requests with respect to customer payment methods and related costs:

- a. Provide, or identify where already stated in the record, the historic test year and forecast test year costs for processing electric bill payments, including but not limited to payments by credit card.
- b. Please explain the Company's methodology for recovering the costs for processing electric bill payments. To the extent that allocations may vary depending on the particular rate used by a residential, commercial, or industrial customer, please explain in full.
- c. Provide, or identify where already stated in the record, the historic test year and forecast test year costs for processing customer payments by physical check.
- d. Please explain the Company's methodology for recovering the costs for processing payments by physical check. To the extent that allocations may vary depending on the particular rate used by a residential, commercial, or industrial customer, please explain in full.
- e. Please explain whether the Company has a unique method (or methods) of receiving customer bill payments for amounts greater than \$500,000? If so,

please identify each such method, explain customer eligibility to use each such method, identify the historic test year and forecast test year costs for each such method, and explain how those costs are allocated to customers.

- 1.25. Please refer to the Company's response to JI 1-158, and answer the following requests:
 - a. Has the Company conducted any analysis on the potential hardship this increase may cause?
 - b. What mitigation measures are being proposed to assist vulnerable customers?
- 1.26. Please refer to the Company's response to Walmart Request 1-8(b) and provide the basis for the Company's decision not to aggregate customers' load to satisfy the 100 MVA threshold for customers with multiple locations under the proposed EHLF rate. If any analysis exists related to that decision, please provide each such analysis along with any workpapers or other supporting documentation.
- 1.27. In reference to the Companies' response to JI 1.81, the response provides a short list of transformers that were "upsized" due to installed solar PV being greater than the transformer nameplate rating. What additional transformer upsizing is anticipated to be needed at various levels of NEM penetration, including the 1% threshold and higher thresholds?
- 1.28. Why are transformers deemed to be in need of upsizing? Is it based on a simplified calculation or a more sophisticated assessment of transformer and demand-side attributes (e.g., transformer temperatures, reactive power, potential for demand response)?

[Signature on next page]

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 July 31, 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