

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

In the matters of:

ELECTRONIC APPLICATION OF	)	
KENTUCKY UTILITIES COMPANY FOR	)	
AN ADJUSTMENT OF ITS ELECTRIC	)	<b>Case No. 2025-00113</b>
RATES AND APPROVAL OF CERTAIN	)	
REGULATORY AND ACCOUNTING	)	
TREATMENTS	)	

AND

ELECTRONIC APPLICATION OF	)	
LOUISVILLE GAS AND ELECTRIC	)	
COMPANY FOR AN ADJUSTMENT OF ITS	)	<b>Case No. 2025-00114</b>
ELECTRIC AND GAS RATES AND	)	
APPROVAL OF CERTAIN REGULATORY	)	
AND ACCOUNTING TREATMENTS	)	

**SIERRA CLUB’S FIRST REQUEST FOR INFORMATION  
TO KENTUCKY UTILITIES COMPANY AND  
LOUISVILLE GAS AND ELECTRIC COMPANY**

Sierra Club hereby submits this First Request for Information to Kentucky Utilities Company (“KU”) and Louisville Gas and Electric Company (“LG&E”), collectively referred to as “LG&E/KU” or the “Companies”. Please provide responses to these data requests below to the undersigned counsel.

**GENERAL INSTRUCTIONS**

**1) Definitions: For the purposes of these data requests, the following definitions shall apply:**

- a) The term “LGE/KU” means and includes Louisville Gas and Electric Company and Kentucky Utilities Company and any and all affiliates and/or subsidiaries, successors, predecessors, agents, consultants, and witnesses in this proceeding, and any and all of their affiliates, subsidiaries, or predecessors.

- b) The term “Companies” and “Company” means and includes Louisville Gas and Electric Company and Kentucky Utilities Company and any and all affiliates and/or subsidiaries, successors, predecessors, agents, consultants, and witnesses in this proceeding, and any and all of their affiliates, subsidiaries, or predecessors.
- c) “Document” means all written, recorded or graphic matters, however produced or reproduced, pertaining in any manner to the subject of this proceeding, whether or not now in existence, without limiting the generality of the foregoing, all originals, copies and drafts of all writings, correspondence, telegrams, notes or sound recordings of any type of personal or telephone communication, or of meetings or conferences, minutes of directors or committee meetings, memoranda, inter-office communications, studies, analyses, reports, results of investigations, reviews, contracts, agreements, working papers, statistical records, ledgers, books of account, vouchers, bank checks, x-ray prints, photographs, films, videotapes, invoices, receipts, computer printouts or other products of computers, computer files, stenographer’s notebooks, desk calendars, appointment books, diaries, or other papers or objects similar to any of the foregoing, however denominated. If a document has been prepared in several copies, or additional copies have been made, and the copies are not identical (or which, by reasons of subsequent modification of a copy by the addition of notations, or other modifications, are no longer identical) each non-identical copy is a separate “document.”
- d) “And” or “or” shall be construed conjunctively or disjunctively as necessary to make the requests inclusive rather than exclusive.
- e) The terms “you” and “your” refer to “LG&E/KU.”
- f) The term “person” means any natural person, corporation, corporate division, partnership, limited liability company, other unincorporated association, trust, government agency, or entity.
- g) The term “regarding” means consisting of, containing, mentioning, suggesting, reflecting, concerning, regarding, summarizing, analyzing, discussing, involving, dealing with, emanating from, directed at, pertaining to in any way, or in any way logically or factually connected or associated with the matter discussed.
- h) The singular as used herein shall include the plural and the masculine gender shall include the feminine and the neuter.
- i) “Identify” or “identifying” or “identification” when used in reference to a person that is a natural person means to state: the full name of the person and any names under which he conducts business; the current employer of the person, the person’s job title and classification, the present or last known work address of the person; and, the present or last known telephone number of the person.
- j) “Identify” or “identifying” or “identification” when used in reference to a person other than a natural person means to state: the full name of the person and any

names under which it conducts business; the present or last known address of the person; and, the present or last known telephone number of the person.

- k) “Identify” or “identifying” or “identification” when used in reference to a document means to provide with respect to each document requested to be identified by these discovery requests a description of the document that is sufficient for purposes of a request to produce or a subpoena duces tecum, including the following:
  - (a) the type of document (e.g., letter, memorandum, etc.);
  - (b) the date of the document;
  - (c) the title or label of the document;
  - (d) the Bates stamp number or other identifier used to number the document for use in litigation;
  - (e) the identity of the originator;
  - (f) the identity of each person to whom it was sent;
  - (g) the identity of each person to whom a copy or copies were sent;
  - (h) a summary of the contents of the document;
  - (i) the name and last known address of each person who presently has possession, custody or control of the document; and,
  - (j) if any such document was, but is no longer, in your possession, custody or control or is no longer in existence, state whether it: (1) is missing or lost; (2) has been destroyed; or (3) has been transferred voluntarily or involuntarily, and if so, state the circumstances surrounding the authorization for each such disposition and the date of such disposition.
- l) “Identify” or “identifying” or “identification” when used in reference to communications means to state the date of the communication, whether the communication was written or oral, the identity of all parties and witnesses to the communication, the substance of what was said and/or transpired and, if written, identify the document(s) containing or referring to the communication.
- m) “Current” when used in reference to time means in the present time of this data request.
- n) “Customer” means a person or company (residential, commercial, or industrial) who buys retail electricity on a regular and ongoing basis from LG&E/KU.
- o) “Workpapers” are defined as original, electronic, machine-readable, unlocked, Excel format (where possible) with formulas in-tact.

### **OTHER INSTRUCTIONS**

- a) Responses are to be provided in electronic format (e.g., text documents should be in the original word processor file format or PDF, data files should be in Excel).
- b) If you contend that any response to any data request may be withheld under the attorney-client privilege, the attorney work product doctrine or any other privilege 4 or basis, please state the following with respect to each such response in order to

explain the basis for the claim of privilege and to permit adjudication of the propriety of that claim: 1) The privilege asserted and its basis; 2) The nature of the information withheld; and, 3) The subject matter of the document, except to the extent that you claim it is privileged.

- c) For any document or set of documents LG&E/KU objects to providing to Sierra Club on the grounds it is burdensome or voluminous, please identify the specific document (see instruction (k) above).
- d) These data requests are to be answered with reference to all information in your possession, custody or control or reasonably available to you. These data requests are intended to include requests for information, which is physically within your possession, custody or control as well as in the possession, custody or control of your agents, attorneys, or other third parties from which such documents may be obtained.
- e) If any data request cannot be responded to or answered in full, answer to the extent possible and specify the reasons for your inability to answer fully.
- f) These data requests are continuing in nature and require supplemental responses should information unknown to you at the time you serve your responses to these data requests subsequently become known.
- g) For each response, identify all persons (see instruction (j)) that were involved in the preparation of the answers to the interrogatories below and/or are responsible for compiling and providing the information contained in each answer.
- h) Identify which witness(es) at the hearing is competent to adopt and/or discuss the response.
- i) Please produce the requested documents in electronic format to the following individuals:  
  
Joe Childers, Joe@jchilderslaw.com  
Nathaniel Shoaff, nathaniel.shoaff@sierraclub.org
- j) Wherever the response to an interrogatory or request consists of a statement that the requested information is already available to the Sierra Club, 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).
- k) In the event that any document referred to in response to any request for information has been destroyed, specify the date and the manner of such destruction, the reason for such destruction, the person authorizing the destruction and the custodian of the document at the time of its destruction.

- l) Sierra Club reserves the right to serve supplemental, revised, or additional discovery requests as permitted in this proceeding.

### **REQUESTS FOR INFORMATION**

- 1-1. Refer to the testimony of Witness John Crocket, at page 13, line 6 to page 14, line 9 quantifying jobs associated with data center projects in other states. Please provide the Companies' estimate of the number of jobs associated with projects in their economic development queue. Please specify the numbers of jobs that are permanent positions and those that are for construction or other temporary purposes.
- 1-2. Refer to the testimony of Witness Shannon Montgomery, at page 15, line 16 to page 18, line 10, addressing the benefits of the Companies' Advanced Metering Infrastructure ("AMI") programs.
  - a. Please provide, or identify where this information already exists in the record, the Companies' analysis of costs and benefits associated with their AMI programs.
  - b. Please describe the public education and outreach efforts the Company intends to conduct to educate customers on the benefits of AMI as that relates to customer energy consumption and customer bill reductions.
- 1-3. Refer to the "Full Customer Notice of Rate Adjustment" and "Abbreviated Customer Notice of Rate Adjustment" filed in these dockets on June 25, 2025. Other than these documents and related redline versions filed in these dockets the same day, please provide all publicly-facing presentations or other educational materials the Companies have released to educate their ratepayers on the proposed rate increases.
- 1-4. Refer to the testimony Witness Michael Hornung, at page 4, line 7 to page 8, line 4, describing the Companies' proposed Extremely High Load Factor ("EHLF") tariff.
  - a. Please identify how many existing customers would qualify for this rate based on load (greater than 100 MVA) and capacity factor (greater than 85% average) criteria identified at Witness Hornung's testimony, page 8, lines 9-10.
  - b. Identify whether existing customers that qualify under those criteria would be obligated to take service under this rate or would have the option to remain on their existing rate.
  - c. Please state whether the Companies expect new customers other than data centers will qualify for the EHLF tariff.
- 1-5. Refer to the testimony of Witness Hornung at page 7, lines 14-19, addressing the protections for existing customers incorporated into the proposed EHLF tariff.

- a. Please state whether the Companies evaluated additional customer protection measures. If such evaluation exists, please provide the Companies' evaluation of those potential measures.
  - b. Please state whether the Companies considered including provisions in the EHLF tariff that would identify costs that must be covered by the prospective EHLF customer, including feasibility study costs and contributions in aid of construction.
  - c. Please provide the Companies' evaluation of such measures, if such an evaluation exists.
- 1-6. Regarding the proposed EHLF tariff, please state whether the Companies evaluated the rates and other measures that utilities across the country have implemented to protect existing customers from economic impacts associated with proposed data centers. If a written evaluation of those rates and utility practices exists, please provide that evaluation.
- 1-7. Refer to the testimony of Witness Hornung at page 14, line 1 to 16, line 14 addressing rates applicable electric vehicle ("EV") charging.
- a. Please provide the Companies' comparison of costs and charging revenues associated with the Companies' electric vehicle rates, incentives, programs, and any Company-owned or Company-operated charging stations.
  - b. If no formal comparison exists, please state the total revenues associated with EV charging since the EV specific rates or programs were approved, and the total amount of costs associated with providing electricity to those customers.
  - c. Identify the number of residential customers currently taking service under the Companies' EV-specific rate offerings.
  - d. For EV-specific rate offerings that include time-of-use rate differentiation or managed charging, please provide the percentage of charging that occurs on-peak and the percentage that occurs off-peak for each rate offering.
  - e. Please describe the companies' public education and outreach efforts aimed at communicating the environmental benefits and customer cost savings of EV adoption.
- 1-8. Refer to the testimony of Witness Charles Schram, at page 11, lines 3-5, identifying overall EV growth in the Companies' service territory from 2020 to 2024.
- a. Identify the number of electric vehicles, by class (i.e., light-, medium-, or heavy-duty), currently registered in the Companies' service territory.

- b. Provide the Companies' forecast for EV adoption in their service territories, broken down by vehicle class.
- 1-9. Refer to the testimony of Witness Schram at page 10, lines 8-12, addressing net metering.
  - a. Please identify the number of customers, by class type (i.e. residential, commercial, industrial), that take service under the Company's existing net metering tariff, along with the cumulative generating capacity of those customers' distributed generation systems.
- 1-10. Refer to the testimony of Witness Schram at page 10, line 12 to page 11, line 2 regarding customers that utilize battery storage systems.
  - a. Please identify any incentives the Companies provide to their customers to incentivize use of battery storage systems.
  - b. Please provide any assessment the Companies have conducted regarding the costs and benefits of incentive programs the Companies have considered related to distributed energy storage systems such as residential batteries.

Dated: July 3, 2025

Respectfully submitted,

/s/ Joe F. Childers

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**CERTIFICATE OF SERVICE**

This is to certify that the foregoing copy of Sierra Club's First Request for Information to LG&E/KU in this action is being electronically transmitted to the Commission on July 3, 2025, and that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding.

/s/ Joe F. Childers  
JOE F. CHILDERS