

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)	

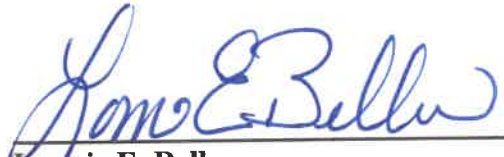
RESPONSE OF
KENTUCKY UTILITIES COMPANY
TO
KENTUCKIANS FOR THE COMMONWEALTH, KENTUCKY SOLAR
ENERGY SOCIETY, AND MOUNTAIN ASSOCIATION 'S INITIAL REQUEST
FOR INFORMATION
DATED JULY 3, 2025

FILED: JULY 16, 2025

VERIFICATION

COMMONWEALTH OF KENTUCKY)
)
COUNTY OF JEFFERSON)

The undersigned, **Lonnie E. Bellar**, being duly sworn, deposes and says that he is Executive Vice President of Engineering, Construction and Generation for PPL Services Corporation and he provides services to Louisville Gas and Electric Company and Kentucky Utilities Company, that he has personal knowledge of the matters set forth in the responses for which he is identified as the witness, and the answers contained therein are true and correct to the best of his information, knowledge and belief.



Lonnie E. Bellar

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 10th day of July 2025.

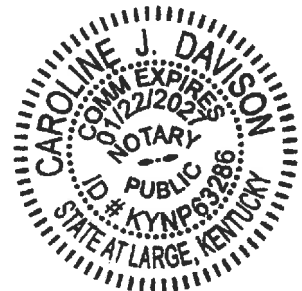


Notary Public

Notary Public ID No. KYNP63286

My Commission Expires:

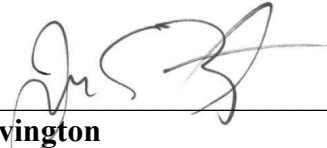
January 22, 2027



VERIFICATION

COMMONWEALTH OF KENTUCKY)
)
COUNTY OF JEFFERSON)

The undersigned, **John Bevington**, being duly sworn, deposes and says that he is Senior Director – Business and Economic Development for PPL Services Corporation and he provides services to LG&E and KU Services Company, that he has personal knowledge of the matters set forth in the responses for which he is identified as the witness, and the answers contained therein are true and correct to the best of his information, knowledge, and belief.



John Bevington

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 10th day of July 2025.



Notary Public

Notary Public ID No. KYNP63286

My Commission Expires:

January 22, 2027



VERIFICATION

COMMONWEALTH OF KENTUCKY)

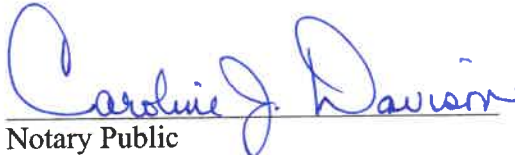
COUNTY OF JEFFERSON)

The undersigned, **Chad E. Clements**, being duly sworn, deposes and says that he is the Director – Regulated Utility Tax for PPL Services Corporation and currently provides tax related services to Louisville Gas and Electric Company and Kentucky Utilities Company, that he has personal knowledge of the matters set forth in the responses for which he is identified as a witness, and that the answers contained therein are true and correct to the best of his information, knowledge, and belief.

Signed by:

563E022E6AAG41B...
Chad E. Clements

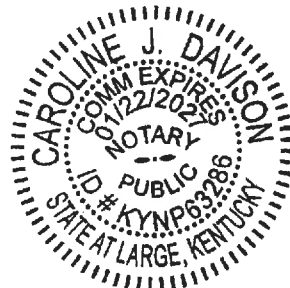
Subscribed and sworn to before me, a Notary Public in and before said County and State, this 11th day of July 2025.


Notary Public

Notary Public ID No. KYNP63286

My Commission Expires:

January 22, 2027

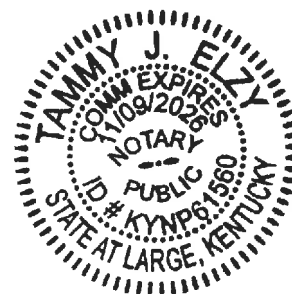


COMMONWEALTH OF KENTUCKY)
)
COUNTY OF JEFFERSON)


Robert M. Conroy

Sammy J. Elzy
Notary Public

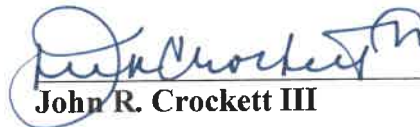
November 9, 2026



VERIFICATION

COMMONWEALTH OF KENTUCKY)
)
COUNTY OF JEFFERSON)

The undersigned, **John R. Crockett III**, being duly sworn, deposes and says that he is President of LG&E and KU Energy and Chief Development Officer of Kentucky Utilities Company and Louisville Gas and Electric Company and an employee of LG&E and KU Services Company, that he has personal knowledge of the matters set forth in the responses for which he is identified as the witness, and the answers contained therein are true and correct to the best of his information, knowledge, and belief.


John R. Crockett III

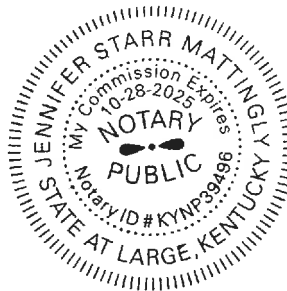
Subscribed and sworn to before me, a Notary Public in and before said County and State, this 11 day of July 2025.


Notary Public

Notary Public ID No. KYNP39496

My Commission Expires:

October 28, 2025

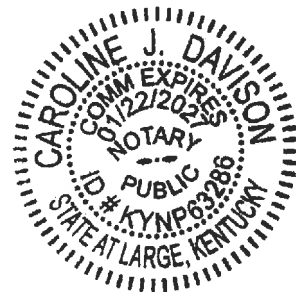


COMMONWEALTH OF KENTUCKY)
)
COUNTY OF JEFFERSON)

Andrea M. Fackler
Andrea M. Fackler

Caroline J. Davison
Notary Public

January 22, 2027



COMMONWEALTH OF KENTUCKY)
)
COUNTY OF JEFFERSON)


Christopher M. Garrett

Sammy J. Elyx
Notary Public

November 9, 2026



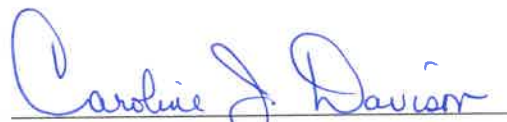
VERIFICATION

COMMONWEALTH OF KENTUCKY)
)
COUNTY OF JEFFERSON)

The undersigned, **Michael E. Hornung**, being duly sworn, deposes and says that he is Manager of Pricing/Tariffs for LG&E and KU Services Company, that he has personal knowledge of the matters set forth in the responses for which he is identified as the witness, and the answers contained therein are true and correct to the best of his information, knowledge, and belief.


Michael E. Hornung

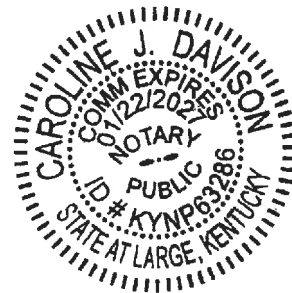
Subscribed and sworn to before me, a Notary Public in and before said County and State, this 14th day of July 2025.


Notary Public

Notary Public ID No. KYNP63286

My Commission Expires:

January 22, 2027



VERIFICATION

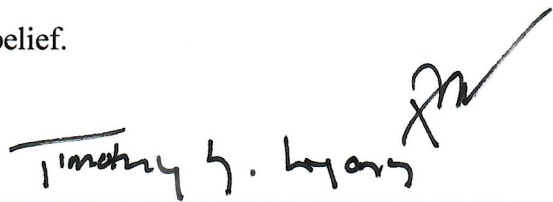
STATE OF VERMONT)

)

COUNTY OF CHITTENDEN)

)

The undersigned, **Timothy S. Lyons**, being duly sworn, deposes and says that he is a Partner with ScottMadden Inc., that he has personal knowledge of the matters set forth in the responses for which he is identified as the witness, and the answers contained therein are true and correct to the best of his information, knowledge and belief.




Timothy S. Lyons

On this 14 day of July, 2025, before me, the undersigned notary public, personally appeared **Timothy S. Lyons**, proved to me through satisfactory evidence of identification, which were Vermont Driver's License, to be the person whose name is signed on the preceding or attached document in my presence.

(seal)




Notary Public Signature
Exp. Jan 31, 2027

VERIFICATION

COMMONWEALTH OF KENTUCKY)

COUNTY OF JEFFERSON)

The undersigned, **Drew T. McCombs**, being duly sworn, deposes and says that he is Director - Regulatory Accounting for PPL Services Corporation and he provides services to Kentucky Utilities Company and Louisville Gas and Electric Company, that he has personal knowledge of the matters set forth in the responses, and that the answers contained therein are true and correct to the best of his information, knowledge, and belief.

Drew T. McCombs
Drew T. McCombs

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 14th day of July 2025.

Tammy J. Ely
Notary Public

Notary Public ID No. KYNP61560


My Commission Expires:

November 9, 2026





COMMONWEALTH OF KENTUCKY)
)
COUNTY OF JEFFERSON)

Elizabeth J. McFarland
Elizabeth J. McFarland


Notary Public

COMMONWEALTH OF KENTUCKY)
)
COUNTY OF JEFFERSON)


Shannon L. Montgomery


Notary Public

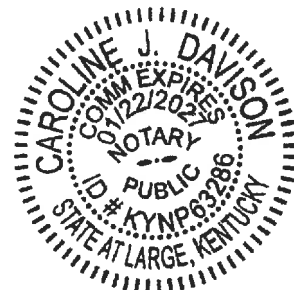


COMMONWEALTH OF KENTUCKY)
)
COUNTY OF JEFFERSON)


Charles R. Schram

Caroline J. Davison
Notary Public


January 22, 2027



VERIFICATION

COMMONWEALTH OF KENTUCKY)
)
COUNTY OF JEFFERSON)

The undersigned, **Peter W. Waldrab**, being duly sworn, deposes and says that he is Vice President, Electric Distribution, for Kentucky Utilities Company and Louisville Gas and Electric Company and an employee of LG&E and KU Services Company, that he has personal knowledge of the matters set forth in the responses for which he is identified as the witness, and the answers contained therein are true and correct to the best of his information, knowledge, and belief.



Peter W. Waldrab

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 10th day of July 2025.

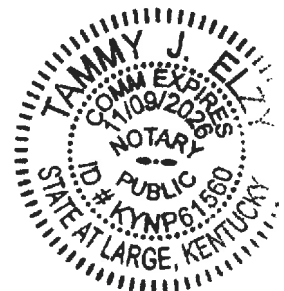


Notary Public

Notary Public ID No. KYNP61560

My Commission Expires:

November 9, 2026



KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association's Initial Request for Information**

Dated July 3, 2025

Case No. 2025-00113

Question No. 1.1

Responding Witness: Drew T. McCombs / Shannon L. Montgomery

Q-1.1. In excel format, please provide each zip code served in whole or part by each company.

A-1.1. See attachment being provided in a separate file.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association's Initial Request for Information
Dated July 3, 2025**

Case No. 2025-00113

Question No. 1.2

Responding Witness: Drew T. McCombs / Shannon L. Montgomery

- Q-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.
- A-1.2. The Company's billing system is only able provide customer data as of its most recent system run. It is not able to produce customer data from previous dates in the detail requested. See attachment being provided in a separate file for the most recent data available as of July 2, 2025.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association's Initial Request for Information**

Dated July 3, 2025

Case No. 2025-00113

Question No. 1.3

Responding Witness: Shannon L. Montgomery

- Q-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."
- A-1.3. The Company does not maintain income data for its customers. The Company defines a "low-income" customer as an account that has received at least one paid pledge during a calendar year. See attachment being provided in a separate file.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association's Initial Request for Information
Dated July 3, 2025**

Case No. 2025-00113

Question No. 1.4

Responding Witness: Shannon L. Montgomery

- Q-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.
- A-1.4. See the response to Question No. 1.3.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association's Initial Request for Information**

Dated July 3, 2025

Case No. 2025-00113

Question No. 1.5

Responding Witness: Shannon L. Montgomery

Q-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.

A-1.5.

- a. – b. See attachment being provided in a separate file.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association's Initial Request for Information
Dated July 3, 2025**

Case No. 2025-00113

Question No. 1.6

Responding Witness: Shannon L. Montgomery

- Q-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.
- A-1.6. The Company cannot provide this information as it does not maintain customers' annual income levels.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association's Initial Request for Information
Dated July 3, 2025**

Case No. 2025-00113

Question No. 1.7

Responding Witness: Andrea M. Fackler / Shannon L. Montgomery

- Q-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.
- A-1.7. See attachment being provided in a separate file. Median residential usage is provided by month for the most recent 24 months. Class average residential bill calculations can be found in the Company's Filing Requirements, specifically Schedule M in Tab 66, Section 16(8)(m) and Schedule N in Tab 67, Section 16(8)(n).

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association's Initial Request for Information
Dated July 3, 2025**

Case No. 2025-00113

Question No. 1.8

Responding Witness: Andrea M. Fackler / Shannon L. Montgomery

- Q-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.
- A-1.8. See attachment being provided in a separate file. Mean residential usage is provided by month for the most recent 24 months. Class average residential bill calculations can be found in the Company's Filing Requirements, specifically Schedule M in Tab 66, Section 16(8)(m) and Schedule N in Tab 67, Section 16(8)(n).

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association's Initial Request for Information**

Dated July 3, 2025

Case No. 2025-00113

Question No. 1.9

Responding Witness: Andrea M. Fackler / Shannon L. Montgomery

Q-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.

A-1.9.

- a. See attachment being provided in a separate file for the most recent three years. The Company does not project residential bill amounts.
- b. The requested analysis does not presently exist and would require original work for the Company to create.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association's Initial Request for Information**

Dated July 3, 2025

Case No. 2025-00113

Question No. 1.10

Responding Witness: Andrea M. Fackler / Shannon L. Montgomery

- Q-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.
- A-1.10. The requested analysis does not presently exist, would require original work for the Company to create, and is overly broad in not providing a specific cutoff for the increments in which the information is requested. See the residential electric typical bill comparisons under current and proposed rates in the Company's Filing Requirements, specifically Schedule N in Tab 67, Section 16(8)(n). The native Excel spreadsheet was provided as a confidential attachment to PSC 1-54 as "2025 PSC DR1 KU Attach to Q54 – Sch N CONFIDENTIAL.xlsx".

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association's Initial Request for Information**

Dated July 3, 2025

Case No. 2025-00113

Question No. 1.11

Responding Witness: Shannon L. Montgomery

Q-1.11. In Excel format, by month for the most recent 24 months, please provide the median monthly residential usage.

A-1.11. See the response to Question No. 1.7.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association's Initial Request for Information
Dated July 3, 2025**

Case No. 2025-00113

Question No. 1.12

Responding Witness: Shannon L. Montgomery

Q-1.12. In Excel format, by month for the most recent 24 months, please provide the median monthly residential bills.

A-1.12. See attachment being provided in a separate file.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association's Initial Request for Information
Dated July 3, 2025**

Case No. 2025-00113

Question No. 1.13

Responding Witness: Shannon L. Montgomery

Q-1.13. In Excel format, by month for the most recent 24 months, please provide the median monthly residential arrearage.

A-1.13. See attachment being provided in a separate file.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association's Initial Request for Information**

Dated July 3, 2025

Case No. 2025-00113

Question No. 1.14

Responding Witness: Shannon L. Montgomery

Q-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).

A-1.14. See attachment being provided in a separate file.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association's Initial Request for Information
Dated July 3, 2025**

Case No. 2025-00113

Question No. 1.15

Responding Witness: Shannon L. Montgomery

Q-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.

A-1.15. See attachment being provided in a separate file.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association's Initial Request for Information**

Dated July 3, 2025

Case No. 2025-00113

Question No. 1.16

Responding Witness: Michael E. Hornung

Q-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.

A-1.16. The complete proposed tariff sheets can be found in Filing Requirements Tab 4; side-by-side tariff sheets comparing the complete current tariff to the complete proposed tariff are in Filing Requirements Tab 5. The complete current tariff sheets can be found at the Commission's website ([KU Tariff.pdf](#)).

- | | | | |
|----|----------------------------|------------------|----------------------|
| a. | RS Late Fees: | Current tariff: | Sheet No. 5.1 |
| | | Proposed tariff: | Sheet No. 5.1 |
| b. | Deposits: | Current tariff: | Sheet Nos. 102-102.1 |
| | | Proposed tariff: | Sheet Nos. 102-102.6 |
| c. | Bad Check Fees: | Current tariff: | Sheet No. 45 |
| | | Proposed tariff: | Sheet No. 45 |
| d. | Disconnect/Reconnect Fees: | Current tariff: | Sheet No. 45 |
| | | Proposed tariff: | Sheet No. 45 |

- e. New Service Connection Fees: Current tariff: Sheet No. 98
Proposed tariff: Sheet No. 98
- f. Field Collection Fees: Current tariff: Sheet Nos. 45-45.2
(Special Charges), and 66-66.1 (Temporary-to-Permanent and Seasonal
Service)
Proposed tariff: Sheet Nos. 45-45.2
(Special Charges), and 66-66.1 (Temporary-to-Permanent and Seasonal
Service)

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association's Initial Request for Information**

Dated July 3, 2025

Case No. 2025-00113

Question No. 1.17

Responding Witness: Michael E. Hornung / Shannon L. Montgomery

Q-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.

A-1.17.

- a. See attachment being provided in a separate file.
- b. This request is too vague to permit the Company to provide a response; it is unclear what "ratemaking treatment of that revenue" means without additional context or explanation.
- c. See the response to part (b).

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association's Initial Request for Information
Dated July 3, 2025**

Case No. 2025-00113

Question No. 1.18

Responding Witness: Timothy S. Lyons

Q-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.

A-1.18. See the table below that contains the fees, FERC account where the cost is recovered through the fees, and allocator used to allocate the cost to each rate class.

Fee	FERC Account	Allocator
Late Fees	903	Customers
Bad Check Fees	903	Customers
Service disconnection and reconnections	586	Meters
New Service Connection Fees	587	Customers
Field Collection Fees	587	Meters

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association's Initial Request for Information
Dated July 3, 2025**

Case No. 2025-00113

Question No. 1.19

Responding Witness: Timothy S. Lyons

- Q-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.
- A-1.19. See page 388-389 of Exhibit TSL-3 in Mr. Lyons's Direct Testimony for allocation of other revenues to each rate class in the allocated cost of service study. See also attachment "2025 PSC DR1 KU Attach to Q54 - Exhibit_TSL-2,TSL-3,TSL-4,TSL-11_KU_COSS - Redacted.xlsx", tab "Input Revenues" to KU's response to PSC 1-54. See also the response to Question No. 1-18 for how the expenses associated with the fees are allocated.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association's Initial Request for Information
Dated July 3, 2025**

Case No. 2025-00113

Question No. 1.20

Responding Witness: Shannon L. Montgomery

Q-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.

A-1.20. Business Day 1: Account is billed, with invoice due 16 business days later.

Business Day 16: Bill is due.

Business Day 17: Late Payment Charge automatically applied to account.

Business Day 19: Disconnect notice is generated and mailed.

Business Day 27: Past-due amount is due.

Business Day 28: Eligible for disconnect.

Business Day 38: Automatic Turn-Off Process begins, account automatically scheduled for disconnection and final bill is generated and sent.

Business Day 54: Final bill is due.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association's Initial Request for Information**

Dated July 3, 2025

Case No. 2025-00113

Question No. 1.21

Responding Witness: Shannon L. Montgomery

Q-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.

A-1.21.

- a. - d. The requested analysis does not presently exist and would require original work for the Company to create.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association's Initial Request for Information
Dated July 3, 2025**

Case No. 2025-00113

Question No. 1.22

Responding Witness: Drew T. McCombs

Q-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.

A-1.22.

- a. In Docket No. ER22-1857-000, KU received \$1 million in refunds from Owensboro Municipal Utility over an 18-month period beginning in September 2022. This refund was the result of a reimbursement issued to Owensboro Municipal Utility from KU in Docket No. EL18-203-000.
- b. The Company has not received any FERC fines, sanctions or other penalties for the most recent five years.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association's Initial Request for Information
Dated July 3, 2025**

Case No. 2025-00113

Question No. 1.23

Responding Witness: Drew T. McCombs

Q-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.

A-1.23.

- a. – c. Not applicable.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association's Initial Request for Information
Dated July 3, 2025**

Case No. 2025-00113

Question No. 1.24

Responding Witness: Shannon L. Montgomery

Q-1.24. Please provide the application for service for electricity service.

A-1.24. See attachment being provided in a separate file.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association's Initial Request for Information**

Dated July 3, 2025

Case No. 2025-00113

Question No. 1.25

Responding Witness: Shannon L. Montgomery

Q-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.

A-1.25. The Company does not require additional information unless more is needed for identity verification or to determine occupancy when a balance owed is owed at the new service address.

To assist with proving identity, the Company may ask for a photograph of a legal form of ID such as a driver's license or passport. To determine occupancy, the Company may ask for a copy of a lease or deed.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association's Initial Request for Information**

Dated July 3, 2025

Case No. 2025-00113

Question No. 1.26

Responding Witness: Shannon L. Montgomery

- Q-1.26. Please identify all circumstances, if any, under which the company may decline to provide service to an applicant for service.
- A-1.26. An applicant may be initially denied service if they have outstanding debt or the applicant's identity cannot be verified.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association's Initial Request for Information
Dated July 3, 2025**

Case No. 2025-00113

Question No. 1.27

Responding Witness: Drew T. McCombs

Q-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.

A-1.27.

- a. – b. See attachment being provided in a separate file.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association's Initial Request for Information**

Dated July 3, 2025

Case No. 2025-00113

Question No. 1.28

Responding Witness: Shannon L. Montgomery

- Q-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.
- A-1.28. See attachment being provided in a separate file. The data is additive, which means that you need to add all the residential aging bands dollars together to calculate the total residential arrearage.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association's Initial Request for Information**

Dated July 3, 2025

Case No. 2025-00113

Question No. 1.29

Responding Witness: Shannon L. Montgomery

- Q-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.
- A-1.29. See attachment being provided in a separate file. The data is additive, which means that you need to add all the residential customers in aging bands together to calculate the total residential customers whose residential arrearage dollars are displayed in Question No. 1.28.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association's Initial Request for Information**

Dated July 3, 2025

Case No. 2025-00113

Question No. 1.30

Responding Witness: Shannon L. Montgomery

Q-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).

A-1.30.

- a. No difference.
- b. No difference.
- c. No difference.
- d. No difference.

- e. Residential Customers who receive a pledge for or notice of low income energy assistance from an authorized agency will not be assessed or required to pay a late payment charge for the bill for which the pledge or notice is received, nor will they be assessed or required to pay a late payment charge in any of the eleven (11) months following receipt of such pledge or notice.
- f. No difference.
- g. No difference.
- h. No difference.
- i. No difference.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association's Initial Request for Information**

Dated July 3, 2025

Case No. 2025-00113

Question No. 1.31

Responding Witness: Shannon L. Montgomery

Q-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).

A-1.31.

- a. Not applicable.
- b. Not applicable.
- c. See Company Tariff Sheet No. 5.1, Late Payment Charge
- d. Not applicable.
- e. Not applicable.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association's Initial Request for Information**

Dated July 3, 2025

Case No. 2025-00113

Question No. 1.32

Responding Witness: Shannon L. Montgomery

- Q-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.
- A-1.32. See attachment being provided in a separate file. The information requested is considered confidential and proprietary and is being provided under seal pursuant to a petition for confidential protection.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association's Initial Request for Information**

Dated July 3, 2025

Case No. 2025-00113

Question No. 1.33

Responding Witness: Shannon L. Montgomery

Q-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.

A-1.33. See the response to Question No. 1.32.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association's Initial Request for Information**

Dated July 3, 2025

Case No. 2025-00113

Question No. 1.34

Responding Witness: Shannon L. Montgomery

- Q-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.
- A-1.34. The Company website references the Customer Bill of Rights. See the response to Question No. 1.32.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association's Initial Request for Information**

Dated July 3, 2025

Case No. 2025-00113

Question No. 1.35

Responding Witness: Shannon L. Montgomery

Q-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.

A-1.35. See the response to Question No. 1.32.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association's Initial Request for Information**

Dated July 3, 2025

Case No. 2025-00113

Question No. 1.36

Responding Witness: Shannon L. Montgomery

Q-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;

A-1.36.

- a. – h. See attachment being provided in a separate file. It is the Company's policy to not renegotiate DPAs.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association's Initial Request for Information**

Dated July 3, 2025

Case No. 2025-00113

Question No. 1.37

Responding Witness: Shannon L. Montgomery

- Q-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?
- A-1.37. The payment will pay the installment plan, then the current bill with the same due date. Any overpayment is then applied to the next open and due receivable. Receivables are paid by the oldest age and the due date of the receivable. If there is still credit left over, it will be credited to the subsequent invoice.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association's Initial Request for Information**

Dated July 3, 2025

Case No. 2025-00113

Question No. 1.38

Responding Witness: Shannon L. Montgomery

- Q-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.
- A-1.38. No confirmation is sent for payment plans less than 30 days, which make up the majority of the Company's payment plan agreements, in accordance with KAR 807 5:006. See attachment being provided in a separate file for an example of a payment plan for a term greater than one month. Customer information that is nonresponsive to the request has been redacted.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association's Initial Request for Information
Dated July 3, 2025**

Case No. 2025-00113

Question No. 1.39

Responding Witness: Shannon L. Montgomery

- Q-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.
- A-1.39. The Customer agrees to the terms of the payment arrangement during the set-up process. However, if a customer expresses that they may be unable to meet the obligation, the Company will provide resources for assistance. The Company website references the Customer Bill of Rights, which lists the customer's options to negotiate a plan and to contact the Public Service Commission.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association's Initial Request for Information**

Dated July 3, 2025

Case No. 2025-00113

Question No. 1.40

Responding Witness: Shannon L. Montgomery

- Q-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.).
- A-1.40. Residential customers are eligible for Budget Billing as long as they have not been removed from Budget Billing in the past twelve months, have more than 10 months of usage at the service address, are not pending disconnect, and agree to include all active services on the Budget Billing plan. Customers on Residential Time-of-Day rates or other rates that require a Demand reading are not eligible.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society, and
Mountain Association's Initial Request for Information**

Dated July 3, 2025

Case No. 2025-00113

Question No. 1.41

Responding Witness: Shannon L. Montgomery

Q-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.

A-1.41.

- a. – d. See attachment being provided in a separate file.
- e. – n. The requested analysis does not presently exist and would require original work for the Company to create.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association's Initial Request for Information**

Dated July 3, 2025

Case No. 2025-00113

Question No. 1.42

Responding Witness: Shannon L. Montgomery

Q-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.

A-1.42. Every four months, the Budget amount is reviewed and revised if necessary to reflect changes from expected rates and/or usage. The accumulated difference between actual and estimated usage is spread over the remaining months of that plan year. The new amount takes effect in the following month and the customer's bill will have the following message: "YOUR BUDGET AMOUNT HAS CHANGED. Energy use can change, often due to weather-related heating or cooling. This helps avoid a large account balance on your budget settlement month. Based on your actual consumption, your budget amount has been revised to \$_____."

A budget bill amount is if the new budget amount is greater than 5% over or 25% under the current budget amount.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association's Initial Request for Information**

Dated July 3, 2025

Case No. 2025-00113

Question No. 1.43

Responding Witness: Shannon L. Montgomery

Q-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.

A-1.43.

- a. The Settlement Bill includes the current month's bill for actual usage plus the accumulated debit (Accumulator). If quoted amount is not paid by the bill due date, Customer is responsible for the full amount shown on the bill and is then eligible for disconnection.

If the account is current and customer advises they are having difficulty paying the Settlement balance, offer the option of rolling the Settlement back into the Accumulator.

In this scenario, Customer must pay at least one and a half times the new Budget amount by the Current Bill Due Date. If the payment is received by the current bill due date, the remaining settlement amount will be added back to the Accumulator. The new Budget amount will be reviewed and changed on the next invoice to accommodate the settlement roll-in.

- b. Any credits are applied toward the current month's bill for actual usage. If the credit is less than the current month's bill, the bill will be reduced by the amount of the credit. The Settlement Bill is billed for the difference.

If the credit is more than the current month's bill, the customer owes nothing for the current month (the Settlement Bill). Leftover credit is applied to future bills.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association's Initial Request for Information**

Dated July 3, 2025

Case No. 2025-00113

Question No. 1.44

Responding Witness: Shannon L. Montgomery

- Q-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.
- A-1.44. The Company assumes that a levelized budget billing plan is the Company budget billing plan. Any arrearages must be paid before a customer can enter a budget billing plan. Customers are only able to roll their current bill balance into a budget billing plan.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association's Initial Request for Information**

Dated July 3, 2025

Case No. 2025-00113

Question No. 1.45

Responding Witness: Shannon L. Montgomery

Q-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.

A-1.45. The Company knows that a customer has a smart thermostat if the customer chooses to enroll their thermostat in the Bring Your Own Device program. The Company knows that a customer has an electric vehicle if the customer chooses to enroll their vehicle in the Optimized Electric Vehicle Charging program.

All DER interconnections associated with solar energy, wind energy, biomass or biogas energy, or hydro-energy installation require an application which indicates the type of DER. Battery storage is a question on the application but not required to complete the application.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association's Initial Request for Information**

Dated July 3, 2025

Case No. 2025-00113

Question No. 1.46

Responding Witness: Shannon L. Montgomery

Q-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.

A-1.46.

- a. See the response to Question No. 1.100(d-e) and (g).
- b. See the response to Question No. 1.100(d-e) and (g).
- c. See the attachment being provided in a separate file for data on customers who have enrolled thermostats in the Bring Your Own Device program. The Company does not have data for smart thermostats on customers who have not enrolled in the Bring Your Own Device program.
- d. See attachment being provided in a separate file for data the Company has on electric vehicle connections. The data is electric vehicle registrations by zip code but not by company or service territory. For zip codes where the Company shares service territory with other electric utilities, the count of electric vehicles may represent more than the electric vehicles registered to addresses served by the Company.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association's Initial Request for Information**

Dated July 3, 2025

Case No. 2025-00113

Question No. 1.47

Responding Witness: Shannon L. Montgomery

Q-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;

A-1.47.

- a. – n. See attachment being provided in a separate file.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association's Initial Request for Information**

Dated July 3, 2025

Case No. 2025-00113

Question No. 1.48

Responding Witness: Charles R. Schram

Q-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?

A-1.48.

- a. Yes.
- b. Yes.
- c. See the response to KYSEIA 1-17. The Company has not created load shapes for calendar year 2023, and the Company has not created load shapes for LIHEAP customers, all of which would require significant original work.
- d. See the response to part (c).
- e. See the response to part (c).

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association's Initial Request for Information**

Dated July 3, 2025

Case No. 2025-00113

Question No. 1.49

Responding Witness: Shannon L. Montgomery / Charles R. Schram

Q-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.

A-1.49. The Company has not completed any studies on the energy use of LIHEAP customers. The Company does not administer LIHEAP but assists its low-income agency partners to ensure delivery of LIHEAP pledges.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association's Initial Request for Information**

Dated July 3, 2025

Case No. 2025-00113

Question No. 1.50

Responding Witness: Shannon L. Montgomery

Q-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.

A-1.50.

- a. – d. See attachments being provided in separate files. Customer information that is nonresponsive to the request has been redacted.
- e. Not applicable.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association's Initial Request for Information**

Dated July 3, 2025

Case No. 2025-00113

Question No. 1.51

Responding Witness: Shannon L. Montgomery

Q-1.51. Please provide a copy of a typical residential bill for each of the following months:

- a. August 2024 (bill with no arrearage);
- b. August 2024 (bill with arrearage);
- c. November 2024 (bill with no arrearage);
- d. November 2024 (bill with arrearage);
- e. January 2025 (bill with no arrearage);
- f. January 2025 (bill with arrearage);
- g. April 2025 (bill with no arrearage);
- h. April 2025 (bill with arrearage).

A-1.51.

- a. – h. See attachments being provided in separate files. Customer information that is nonresponsive to the request has been redacted.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association's Initial Request for Information**

Dated July 3, 2025

Case No. 2025-00113

Question No. 1.52

Responding Witness: Shannon L. Montgomery

Q-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.

A-1.52.

- a. – e. See attachment being provided in a separate file.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association's Initial Request for Information**

Dated July 3, 2025

Case No. 2025-00113

Question No. 1.53

Responding Witness: John R. Crockett

Q-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.

A-1.53.

- a. – b. See Crockett Testimony page 10 lines 1-7 for data on affordability

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association's Initial Request for Information**

Dated July 3, 2025

Case No. 2025-00113

Question No. 1.54

Responding Witness: Shannon L. Montgomery

- Q-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.
- A-1.54. The Company does not have any studies that discuss the amount which residential arrears must reach in order for the Company to cost-effectively disconnect service due to the arrearage. No studies or analyses have been completed.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association's Initial Request for Information**

Dated July 3, 2025

Case No. 2025-00113

Question No. 1.55

Responding Witness: Shannon L. Montgomery

- Q-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.
- A-1.55. The Company does not have any studies that discuss the amount which residential arrears must reach in order for the Company to cost-effectively disconnect service due to the arrearage.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association's Initial Request for Information**

Dated July 3, 2025

Case No. 2025-00113

Question No. 1.56

Responding Witness: Shannon L. Montgomery

- Q-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.
- A-1.56. The Company does not have any studies that indicate why customers do not contact the Company after nonpayment communication.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association's Initial Request for Information**

Dated July 3, 2025

Case No. 2025-00113

Question No. 1.57

Responding Witness: Shannon L. Montgomery

- Q-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.
- A-1.57. See the response to Question No. 1.52 which contains information related to shutoff notices (referred to as "Brown Bill").

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association's Initial Request for Information**

Dated July 3, 2025

Case No. 2025-00113

Question No. 1.58

Responding Witness: Shannon L. Montgomery

- Q-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.
- A-1.58. The Company does not have any studies that discuss why residential customers do not successfully complete deferred payment plans.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association's Initial Request for Information**

Dated July 3, 2025

Case No. 2025-00113

Question No. 1.59

Responding Witness: Charles R. Schram

Q-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.

A-1.59.

- a. - c. The Company has not performed any studies on this topic in the last 5 years. For information on the use of elasticities in the Company's forecast modeling, see the attachment to filing requirements at Tab 16 – 807 KAR 5:001 Sec. 16(7)(c) Item B, Appendices A and B.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association's Initial Request for Information**

Dated July 3, 2025

Case No. 2025-00113

Question No. 1.60

Responding Witness: Shannon L. Montgomery

Q-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.

A-1.60.

- a. The Company does not have any studies that assess the extent to which cash security deposits reduce residential bad debt.
- b. The Company does not have any studies that assess the extent to which deferred payment agreements reduce residential bad debt.
- c. See the response to Question No. 1.52 which contains information related to charge-offs which occur at 91+ days.
- d. The Company does not have any studies that assess the extent to which late payment charges reduce residential bad debt.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association's Initial Request for Information**

Dated July 3, 2025

Case No. 2025-00113

Question No. 1.61

Responding Witness: Shannon L. Montgomery

Q-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.

A-1.61.

- a. The Company does not have any studies that assess the extent to which cash security deposits reduce residential arrears.
- b. The Company does not have any studies that assess the extent to which deferred payment agreements reduce residential arrears.
- c. See the response to Question No. 1.52.
- d. The Company does not have any studies that assess the extent to which late payment charges reduce residential arrears.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association's Initial Request for Information**

Dated July 3, 2025

Case No. 2025-00113

Question No. 1.62

Responding Witness: Shannon L. Montgomery

Q-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.

A-1.62.

- a. The Company does not have any studies that assess the extent to which cash security deposits accelerate residential payments.
- b. The Company does not have any studies that assess the extent to which deferred payment agreements accelerate residential payments.
- c. See the response to Question No. 1.52.
- d. The Company does not have any studies that assess the extent to which late payment charges accelerate residential payments.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association's Initial Request for Information**

Dated July 3, 2025

Case No. 2025-00113

Question No. 1.63

Responding Witness: Shannon L. Montgomery

Q-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.

A-1.63.

- a. – c. The Company does not keep statistics on bills and disconnection notices returned as undeliverable mail. See the response to Question No. 1.64 for discussion of the automated process that the Company is currently developing in consultation with its bill print vendor related to returned mail.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association's Initial Request for Information**

Dated July 3, 2025

Case No. 2025-00113

Question No. 1.64

Responding Witness: Shannon L. Montgomery

Q-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.

A-1.64.

- a. – b. The Company is currently automating a new process for addressing returned bills and disconnection notices where the Company's bill print vendor will provide the Company a file of all customers with returned bills or disconnect notices and the Company will then initiate automated phone calls to these customers requesting they contact the Company to update their mailing information.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association's Initial Request for Information**

Dated July 3, 2025

Case No. 2025-00113

Question No. 1.65

Responding Witness: Shannon L. Montgomery

Q-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.

A-1.65.

- a. – b. Whether the account has an arrearage balance or not, the LIHEAP benefit applies to the account and any excess benefit becomes a credit on the customer's account and is applied to the subsequent invoice.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association's Initial Request for Information**

Dated July 3, 2025

Case No. 2025-00113

Question No. 1.66

Responding Witness: Shannon L. Montgomery

- Q-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
- A-1.66. The requested analysis does not presently exist and would require original work for the Company to create.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association's Initial Request for Information**

Dated July 3, 2025

Case No. 2025-00113

Question No. 1.67

**Responding Witness: John R. Crockett / Christopher M. Garrett / Shannon L.
Montgomery**

- Q-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.
- A-1.67. See the attachment being provided in a separate file. Portions of the attachment that are nonresponsive to the request have been redacted. Also see the direct testimony of John Crockett (pp. 15-16) and Shannon Montgomery (pp. 5-10) regarding assistance to low-income customers.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association's Initial Request for Information
Dated July 3, 2025**

Case No. 2025-00113

Question No. 1.68

**Responding Witness: John R. Crockett / Christopher M. Garrett / Shannon L.
Montgomery**

Q-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.

A-1.68. See the response to Question No. 1.67.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association's Initial Request for Information**

Dated July 3, 2025

Case No. 2025-00113

Question No. 1.69

**Responding Witness: John R. Crockett / Christopher M. Garrett / Shannon L.
Montgomery**

Q-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.

A-1.69. There are no such documents.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association's Initial Request for Information
Dated July 3, 2025**

Case No. 2025-00113

Question No. 1.70

**Responding Witness: John R. Crockett / Christopher M. Garrett / Shannon L.
Montgomery**

Q-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.

A-1.70. See the response to Question No. 1.67.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association's Initial Request for Information**

Dated July 3, 2025

Case No. 2025-00113

Question No. 1.71

**Responding Witness: John R. Crockett / Christopher M. Garrett / Shannon L.
Montgomery**

Q-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.

A-1.71. There are no such documents.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association's Initial Request for Information**

Dated July 3, 2025

Case No. 2025-00113

Question No. 1.72

**Responding Witness: John R. Crockett / Christopher M. Garrett / Shannon L.
Montgomery**

Q-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.

A-1.72. There are no such documents.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society, and
Mountain Association's Initial Request for Information**

Dated July 3, 2025

Case No. 2025-00113

Question No. 1.73

Responding Witness: John R. Crockett / Shannon L. Montgomery

Q-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.

A-1.73.

- a. See attached agendas from the Customer Commitment Advisory Forum.
- b. No applicable Company Board of Directors' agenda items, presentations or materials exist.
- c. No applicable holding company Board of Directors' agenda items, presentations or materials exist.
- d. No applicable holding company Board of Directors' agenda items, presentations or materials exist.

- e. No applicable Company Board of Directors' agenda items, presentations or materials exist.
- f. No applicable Company Board of Directors' agenda items, presentations or materials exist.
- g. No applicable Company Board of Directors' agenda items, presentations or materials exist.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association's Initial Request for Information**

Dated July 3, 2025

Case No. 2025-00113

Question No. 1.74

Responding Witness: Shannon L. Montgomery

- Q-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).
- A-1.74. The Company does not have a business reason to maintain data in regards to the socio-economic status of the customer. Accordingly, no such documents exist.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association's Initial Request for Information**

Dated July 3, 2025

Case No. 2025-00113

Question No. 1.75

Responding Witness: Shannon L. Montgomery

- Q-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);
- A-1.75. The Company does not have a business reason to maintain data in regards to the socio-economic status of the customer. Accordingly, no such documents exist.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association's Initial Request for Information**

Dated July 3, 2025

Case No. 2025-00113

Question No. 1.76

Responding Witness: Shannon L. Montgomery

Q-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.

A-1.76. The Company does not have a business reason to maintain race data for its customers. Accordingly, no such documents exist.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association's Initial Request for Information**

Dated July 3, 2025

Case No. 2025-00113

Question No. 1.77

Responding Witness: Peter W. Waldrab

Q-1.77. Please provide a comprehensive list of the “grid challenges” referenced in the testimony of Waldrab, page 2, lines 4 – 7.

A-1.77. Common grid challenges:

- Aging Infrastructure
- Vegetation
- Circuit Topology
- System Contingency
- Resiliency in Natural Disasters
- Wildfire Mitigation
- EV Charging
- Distributed Energy Resources
- Bi-Directional Power Flow
- Rapid Load Growth
- Data Center Load Accommodation
- Customer Expectations for Power Quality and Reliability

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association's Initial Request for Information**

Dated July 3, 2025

Case No. 2025-00113

Question No. 1.78

Responding Witness: Shannon L. Montgomery / Peter W. Waldrab

Q-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.

A-1.78.

- a. See attachment being provided in a separate file.
- b. See attachment being provided in a separate file.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association's Initial Request for Information
Dated July 3, 2025**

Case No. 2025-00113

Question No. 1.79

Responding Witness: Shannon L. Montgomery / Peter W. Waldrab

Q-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.

A-1.79. See the response to Question No. 1.46(d).

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association's Initial Request for Information**

Dated July 3, 2025

Case No. 2025-00113

Question No. 1.80

Responding Witness: Shannon L. Montgomery

Q-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.

A-1.80.

- a. See the response in Question No. 1.100(d).
- b. See attachment being provided in a separate file.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association's Initial Request for Information
Dated July 3, 2025**

Case No. 2025-00113

Question No. 1.81

Responding Witness: Peter W. Waldrab

Q-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.

A-1.81.

- a. The following chart shows the known transformers that were "upsized" due to installed solar PV being greater than the transformer nameplate rating:

Utility	Zip Code	System Size AC/DC	xfrmr size (new)	xfrmr Size (original)	Cost	Date Submitted
KU	40175-1462	37.1 kW/42.5 kW	50 kva	15kva	\$713	2/13/2025
KU	42503-2792	44.5 kW/45 kW	50 kva	37 kva	\$885	8/5/2024
KU	40067	42.6 kW/52.9 kW	50 kva	37 kva	\$1,054	12/12/2022

- b. See the response to part (a). Costs listed were born by the individual solar PV installer (customer or contractor).

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association's Initial Request for Information
Dated July 3, 2025**

Case No. 2025-00113

Question No. 1.82

Responding Witness: Peter W. Waldrab

- Q-1.82. Please refer to Exhibit PWW-3 at page 3 and provide a copy of each "locational analysis" of solar PV referenced.
- A-1.82. "Locational analysis" refers to the individual study performed for each solar PV application. As this study was hypothetical, no "location analysis" was completed.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association's Initial Request for Information**

Dated July 3, 2025

Case No. 2025-00113

Question No. 1.83

Responding Witness: Shannon L. Montgomery

Q-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.

A-1.83. See the response to Question No. 1.46 part (c).

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association's Initial Request for Information
Dated July 3, 2025**

Case No. 2025-00113

Question No. 1.84

Responding Witness: Shannon L. Montgomery

Q-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.

A-1.84.

- a. See attachment being provided in a separate file.
- b. No incentives have been provided through the Peak Time Rebates program as a Peak Time Rebates event has not yet been called. Incentives will be provided for demand response events that include the Peak Time Rebates program and when participants in the program reach their 12-month enrollment anniversary.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association's Initial Request for Information
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Case No. 2025-00113

Question No. 1.85

Responding Witness: Shannon L. Montgomery

Q-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.

A-1.85.

- a. – c. See attachment being provided in a separate file.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association's Initial Request for Information
Dated July 3, 2025**

Case No. 2025-00113

Question No. 1.86

Responding Witness: Shannon L. Montgomery

Q-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.

A-1.86. See attachment being provided in a separate file.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association's Initial Request for Information**

Dated July 3, 2025

Case No. 2025-00113

Question No. 1.87

Responding Witness: Shannon L. Montgomery

Q-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.

A-1.87. See attachment being provided in a separate file.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association's Initial Request for Information**

Dated July 3, 2025

Case No. 2025-00113

Question No. 1.88

Responding Witness: Andrea M. Fackler / Timothy S. Lyons

Q-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.

A-1.88.

- a. See page 380-387 of Exhibit TSL-3 in Mr. Lyons's Direct Testimony that shows a direct assignment of plant investment and expenses related to the Solar Share Program (SSP) and the Business Solar Program (BSP). These costs are assigned only to SSP and BSP. See also page 11-12 of Exhibit TSL-3 for direct assignment of plant investment related to SSP and BSP is assigned only to SSP and BSP rate classes. Finally, see page 29 of Mr. Lyons Direct Testimony that states, "...the Companies have imputed revenues to bring the class rate of return for SSP and BSP in the Companies' cost of service studies up to the overall rate of return on rate base proposed by the Companies in these proceedings. Specifically, for the SSP and BSP, revenues of \$187,063 are imputed for KU and revenues of \$137,436 are imputed for LG&E."
- b. See page 380-387 of Exhibit TSL-3 in Mr. Lyons's Direct Testimony for direct assignment of plant investment and expenses related to SSP and BSP.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association's Initial Request for Information**

Dated July 3, 2025

Case No. 2025-00113

Question No. 1.89

Responding Witness: Michael E. Hornung

- Q-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.
- A-1.89. The Company is not proposing to change the charges in the Solar Share Program Rider. The current charges were determined by the Commission in the 2018 Rate Case Final Order. See attachment being provided in a separate file.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association's Initial Request for Information**

Dated July 3, 2025

Case No. 2025-00113

Question No. 1.90

Responding Witness: Chad E. Clements / Christopher M. Garrett

- Q-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.
- A-1.90. See attachments being provided in separate files. The Company's 2022, 2023, and 2024 LG&E and KU Foundation IRS Form 990-PF are provided. The information requested is confidential and proprietary and is being provided under seal pursuant to a petition for confidential protection.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association's Initial Request for Information**

Dated July 3, 2025

Case No. 2025-00113

Question No. 1.91

Responding Witness: Shannon L. Montgomery

Q-1.91. Please provide, for each of the most recent three years available, the annual reports for:

- a. KU's Winter Care program;
- b. The Winterhelp Energy Assistance Fund.

A-1.91. See attachments being provided in a separate files. The Company has provided the most recent three years available for the HEA Annual Report. The Company does not have an annual report for the WinterCare or WinterHelp programs. WinterHelp is a program for LG&E customers.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association's Initial Request for Information**

Dated July 3, 2025

Case No. 2025-00113

Question No. 1.92

Responding Witness: Shannon L. Montgomery

Q-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. A list of the customers receiving assistance from each program (with all personally identifiable information redacted);
- b. The dollars of arrears on the customer's account at the time the customer received such assistance;
- c. The dollars of arrears on the customer's account four months after receiving such assistance; and
- d. The dollars of arrears on the customer's account twelve months after receiving such assistance.

A-1.92.

- a. See attachment being provided in a separate file. The Company does not maintain such a list but has provided counts for customers receiving assistance from each program.
- b. – d. The requested analysis does not presently exist and would require original work for the Company to create. The Company does not track the data required to provide the dollars of arrears on the customer's account at the time, four months after, nor twelve months after the customer received such assistance.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association 's Initial Request for Information**

Dated July 3, 2025

Case No. 2025-00113

Question No. 1.93

Responding Witness: Shannon L. Montgomery

Q-1.93. Please provide a list of the names and addresses of locations:

- a. Where a residential customer can currently make a cash payment toward his or her bill.
- b. Where a residential customer can currently make a payment of other than cash toward his or her bill.

A-1.93.

- a. Customers can make a cash payment through Company vendor Fiserv. A complete listing of locations is found at <https://www.checkfreepay.com/en/payment-locator.html>.
- b. Customers can make a non-cash payment through Paymentus, My Account, through their bank, and by mailing in a payment. Customers can also utilize the Company's auto-pay feature.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
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Dated July 3, 2025

Case No. 2025-00113

Question No. 1.94

Responding Witness: Shannon L. Montgomery

Q-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:

- a. Is capable of immediately responding to an inquiry about a residential bill; or
- b. Can negotiate a deferred payment arrangement for an outstanding bill; or
- c. Can negotiate a resolution to an outstanding shutoff for nonpayment; or
- d. Can negotiate a service reconnection after a shutoff for nonpayment; or
- e. Can provide assistance in referring to customer to LIHEAP; or
- f. Can provide assistance in referring a customer to a Company-supported hardship fund.

A-1.94.

- a. Since the closure of the last business offices in June 2024, the Company does not have any walk-in customer service locations. Customers can still make personal contact via phone and email with live agents by contacting the Company's contact centers. Many tasks can also be performed via self-service.
- b. – f. See the response to part (a).

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
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Case No. 2025-00113

Question No. 1.95

Responding Witness: Shannon L. Montgomery

Q-1.95. For each office listed in response to the preceding data request, please provide the following:

- a. 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;
- b. 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;
- 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.

A-1.95.

- a. – h. See the response to Question No. 1.94 part (a).

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
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Case No. 2025-00113

Question No. 1.96

Responding Witness: Shannon L. Montgomery

Q-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.

A-1.96. The Companies interpret the term “field offices” to refer to our electric distribution operations centers, which are located in various counties throughout our service territories. They are used to manage and maintain our energy infrastructure to ensure reliable service for customers. They serve as staging areas for dispatching crews during storm responses. The Companies are not proposing to close any field offices in this case. Field offices are not open to the public.

Historically, the types of in-person customer interactions referenced in each subpart of this question would have taken place at the Companies’ local business offices, which have now all been closed. In light of those closures, customers may now contact the Companies via phone or email to discuss any of the items listed in parts (a) through (f) of this request.

KENTUCKY UTILITIES COMPANY

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Case No. 2025-00113

Question No. 1.97

Responding Witness: Shannon L. Montgomery

Q-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.

A-1.97.

- a. The Company does not survey customers on the IVR.
- b. – d. See the response to part (a).

KENTUCKY UTILITIES COMPANY

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Case No. 2025-00113

Question No. 1.98

Responding Witness: Shannon L. Montgomery

Q-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.

A-1.98.

- a. The customer satisfaction point-of-contact survey is not specific to credit and collections issues. See attachment being provided in a separate file.
- b. The Company does not have walk-in company offices.
- c. The Company does not survey customers on phone contact made through an IVR and/or VRU system.
- d. The Company does not survey customers on web-based contacts.

KENTUCKY UTILITIES COMPANY

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Case No. 2025-00113

Question No. 1.99

Responding Witness: Shannon L. Montgomery

Q-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.

A-1.99.

- a. The customer satisfaction point-of-contact survey is not specific to deferred payment arrangements. See attachment provided in response to Question No. 1.98(a).
- b. The Company does not have walk-in company offices.
- c. The Company does not survey customers on deferred payment arrangements made through the IVR.
- d. The Company does not survey customers on web-based contacts.

KENTUCKY UTILITIES COMPANY

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Case No. 2025-00113

Question No. 1.100

Responding Witness: Michael E. Hornung / Shannon L. Montgomery / Charles R. Schram

Q-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.

A-1.100.

- a. See attachment being provided in a separate file.
- b. See the attachment provided in response to part (a)
- c. Excess Generation refers to energy produced by the customer that is not used onsite and is sent to the Company's grid. Bilateral meters track both incoming and outgoing energy flows.
- d. See attachment being provided in a separate file.
- e. See the attachment provided in response to part (d).
- f. See attachment being provided in a separate file.
- g. See the attachment provided in response to part (d).

- h. The Companies do not have the data regarding NMS generation during the peak hour. For information on installed NMS capacity as a percentage of peak load, see the table below.

Year	Percent of prior year's peak (LG&E)	Percent of prior year's peak (KU)
2018	0.1%	0.1%
2019	0.1%	0.1%
2020	0.2%	0.2%
2021	0.3%	0.3%
2022	0.6%	0.4%
2023	0.8%	0.6%
2024	0.9%	0.6%

- i. For information concerning net metering or generation from NMS customers for the years 2018 through 2024, please refer to Kentucky Utilities' EIA-861 Monthly submissions to the Energy Information Administration (EIA). The data is located at <https://www.eia.gov/electricity/data/eia861m/>. The Kentucky Utilities monthly data will be under the Net Metering section for each year and on the Utility Level-States tab.
- j. See attachment being provided in a separate file. Monthly consumption for the twelve months prior to interconnection was provided where available. Customers that took NMS the same period they moved into their premise will not appear in the data for this response.
- k. The Companies do not track this information.

KENTUCKY UTILITIES COMPANY

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Question No. 1.101

Responding Witness: Charles R. Schram

Q-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.

A-1.101. See the workpapers previously provided in Exhibit CRS-7 in the folder named "CSR_QF_NMS."

KENTUCKY UTILITIES COMPANY

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Case No. 2025-00113

Question No. 1.102

**Responding Witness: Robert M. Conroy / Michael E. Hornung / Elizabeth J.
McFarland / Charles R. Schram / Peter W. Waldrab**

Q-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.

A-1.102.

- a. See the following direct testimonies and workpapers: Hornung at 18-19 (overview and jobs benefits); McFarland at 31-32 and Exh. BJM-3 (avoided transmission capacity cost); Schram at 30-39, Exh. CRS-6, and Exh. CRS-7 folder “CSR_QF_NMS” (avoided energy cost, avoided generation capacity cost, avoided ancillary services cost, avoided carbon cost, and avoided environmental compliance cost); and Waldrab at 37-41 and Exh. PWW-3 (avoided distribution capacity cost).
- b. See the response to part (a).

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Question No. 1.103

Responding Witness: Robert M. Conroy / Michael E. Hornung

Q-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.

A-1.103. The Company has not performed the requested analysis. See the response to Question No. 1.102.

KENTUCKY UTILITIES COMPANY

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Question No. 1.104

Responding Witness: Charles R. Schram

Q-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).

A-1.104.

- a. See attachment being provided in a separate file. The attachment includes both 15-minute and hourly values of combined-company energy requirements. The hourly data comes from the Energy Management System ("EMS"), which is used for planning and operational purposes. The 15-minute data is sourced outside of the EMS system and should therefore be considered an estimate.
- b. The attachment being provided in a separate file contains marginal energy costs from the Companies' FERC Form 714, a breakdown of these costs by year, month, and hour, and a breakdown of these costs by peak type (peak and off-peak).
- c. See the response to part (b).
- d. See the response to part (b). Demand charges are not applicable. There are no hourly cost adders related to the Companies' internal transmission costs.
- e. See attachment being provided in a separate file.

KENTUCKY UTILITIES COMPANY

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Question No. 1.105

Responding Witness: Robert M. Conroy

Q-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.

A-1.105. No. First, KRS 278.466(6) precludes the Company from applying or charging any Rider NMS-1 customer different rates than would apply to that customer absent net metering.

Second, regarding Rider NMS-2 customers, the Company has not asserted, and it is unaware of, any evidence to suggest that the cost to *serve* Rider NMS-2 customers and similarly situated non-Rider NMS-2 customers is different. The Company's proposed Rider NMS-2 compensation rate fully accounts for the value Rider NMS-2 customers provide, which rate applies to all energy such customers produce to the grid and for which all other customers pay through the Company's fuel adjustment clause. For references to the Company's analysis supporting its proposed Rider NMS-2 rate, see the response to Question No. 102(a).

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Question No. 1.106

Responding Witness: Peter W. Waldrab

Q-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.

A-1.106. See the direct testimony of Peter W. Waldrab, Exhibit PWW-3 (avoided distribution capacity cost).

KENTUCKY UTILITIES COMPANY

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Question No. 1.107

Responding Witness: Robert M. Conroy / Michael E. Hornung

Q-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.

A-1.107. Yes. Upon approval in this proceeding, the proposed compensation rate will be effective January 1, 2026, for all customers under Rider NMS-2.

- a. See above.
- b. Not applicable.

KENTUCKY UTILITIES COMPANY

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Question No. 1.108

Responding Witness: Robert M. Conroy / Michael E. Hornung / Charles R. Schram

Q-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?

A-1.108.

- a. See the direct testimony of Charles R. Schram, p. 9, lines 13-15. See also the response to Question No. 1.135.
- b. Customers with behind the meter generation would still have the ability to offset their own consumption and would have the ability to receive compensation for generation fed back to the grid at the rates specified in the SQF tariff.

KENTUCKY UTILITIES COMPANY

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Question No. 1.109

Responding Witness: Robert M. Conroy / Michael E. Hornung

Q-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.

A-1.109.

- a. This is confirmed for customers who are providing "as available" energy to the Companies. A customer that contracts to sell their entire output with a capacity payment will not offset their own consumption.
- b. See the response to part (a).

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Question No. 1.110

Responding Witness: Timothy S. Lyons

Q-1.110. Please provide working Excel models of the Company's class cost of service studies developed for this rate case.

A-1.110. See attachment "2025 PSC DR1 KU Attach to Q54 - Exhibit_TSL-2,TSL-3,TSL-4,TSL-11_KU_COSS - Redacted.xlsx" to PSC 1-54.

KENTUCKY UTILITIES COMPANY

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Question No. 1.111

Responding Witness: Timothy S. Lyons

Q-1.111. Please provide all cost of service workpapers in native electronic format, including any and all linked data and working files.

A-1.111. All workpapers used by the Company's cost of service witness, Timothy S. Lyons, were previously provided in KU's response to PSC 1-54 in native electronic format including any and all linked data and working files.

KENTUCKY UTILITIES COMPANY

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Question No. 1.112

Responding Witness: Andrea M. Fackler / Elizabeth J. McFarland

Q-1.112. Please provide the FERC decisions authorizing the revenue requirements for the transmission systems for LG&E and KU since 2010.

A-1.112. FERC approved the use of a formula rate for the LG&E and KU transmission systems. The transmission formula rate is contained in Attachment O to the LG&E and KU Joint Pro Forma Open Access Transmission Tariff. See attachments being provided in separate files for FERC decisions since 2010 on modification to the Attachment O.

KENTUCKY UTILITIES COMPANY

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Case No. 2025-00113

Question No. 1.113

Responding Witness: Lonnie E. Bellar / Elizabeth J. McFarland / Charles R. Schram / Peter W. Waldrab

Q-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.

A-1.113. See the table below for a list of installed generation units that are owned and operated by the Companies in their service territories.

Plant	Unit	Operation Date	Ownership			Technology & Fuel
			KU	LGE	3rd Party	
Trimble County	2	2011	61%	14%	25% ¹	Supercritical Coal (Barge)
Cane Run	7	2015	78%	22%	0%	Natural Gas Combined Cycle
E.W. Brown	Solar	2016	61%	39%	0%	Solar PV
Simpsonville Solar	1	2019	56%	44%	0%	Solar PV

Additionally, see the table below for a list of generation units, of which the Companies are aware, that are physically located in their service territories, but are owned and operated by third parties and are not designated as the Companies' Network Resources.

Plant	Unit	Operation Date	Ownership			Technology & Fuel
			KU	LGE	3rd Party	
Ashwood Solar I, LLC	1	2025	0%	0%	100%	Solar PV
Cooperative Solar One	1	2017	0%	0%	100%	Solar PV
Green City Recovery, LLC	1	2016	0%	0%	100%	Landfill Gas
Green City Recovery, LLC	2	2019	0%	0%	100%	Landfill Gas

¹ The Illinois Municipal Electric Agency (IMEA) owns 12.12% of Trimble County 2. The Indiana Municipal Power Agency (IMPA) owns 12.88% of Trimble County 2.

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Question No. 1.114

Responding Witness: Charles R. Schram

Q-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.

A-1.114.

Name	Type	Year Signed	Generation Technology	Fuel/Energy Source	Status
Rhudes Creek	PPA	2019	Photovoltaic	Solar	Awaiting siting approvals
Grays Branch	PPA	2023	Photovoltaic	Solar	Awaiting siting approvals and final pricing
Nacke Pike	PPA	2023	Photovoltaic	Solar	Awaiting siting approvals and final pricing
Gage	PPA	2023	Photovoltaic	Solar	Terminated
Ragland	PPA	2021	Photovoltaic	Solar	Terminated
Song Sparrow	PPA	2023	Photovoltaic	Solar	Terminated
Bluegrass Generation Company	Tolling Agreement	2014	Simple Cycle Combustion Turbine	Natural Gas	Ended 2019

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Question No. 1.115

Responding Witness: Charles R. Schram

Q-1.115. Please provide the historic peak demands by utility for LG&E and KU since 2010.

A-1.115. See attachment being provided in a separate file.

KENTUCKY UTILITIES COMPANY

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Question No. 1.116

Responding Witness: Drew T. McCombs

Q-1.116. Please provide the historic energy sales by utility for LG&E and KU since 2010.

A-1.116. See attachment being provided in a separate file.

KENTUCKY UTILITIES COMPANY

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Case No. 2025-00113

Question No. 1.117

Responding Witness: Drew T. McCombs

Q-1.117. Please provide all historic environmental compliance costs recorded by utility by year for LG&E and KU since 2010.

A-1.117. See attachment being provided in a separate file.

KENTUCKY UTILITIES COMPANY

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Case No. 2025-00113

Question No. 1.118

Responding Witness: Lonnie E. Bellar / Drew T. McCombs

Q-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.

A-1.118. See attachment being provided in a separate file.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
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Case No. 2025-00113

Question No. 1.119

Responding Witness: Lonnie E. Bellar / Charles R. Schram

Q-1.119. Please specify the fuel or energy source for all utility owned generation for each plant by year since 2010.

A-1.119. See attachment being provided in a separate file.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
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Case No. 2025-00113

Question No. 1.120

Responding Witness: Charles R. Schram

Q-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.)

A-1.120. See attachment being provided in a separate file. Note that fuel consumption reported for Trimble County 1 and Trimble County 2 reflect 100% of the fuel consumed by the unit as reported to NERC GADS. The Companies' collective ownership of these units is 75%.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
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Dated July 3, 2025

Case No. 2025-00113

Question No. 1.121

Responding Witness: Charles R. Schram

Q-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.)

A-1.121. See attachment being provided in a separate file. Note that Gross Actual Generation (MWh) reported for Trimble County 1 and Trimble County 2 reflect 100% of the gross generation from the unit as reported to NERC GADS. The Companies' collective ownership of these units is 75%.

KENTUCKY UTILITIES COMPANY

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Case No. 2025-00113

Question No. 1.122

Responding Witness: Charles R. Schram

Q-1.122. Please provide the Integrated Resource Plans for LG&E and KU applicable to this rate case.

A-1.122. See the response to DOD 1-27.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
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Case No. 2025-00113

Question No. 1.123

Responding Witness: Charles R. Schram

Q-1.123. In developing the load forecasts for that IRP, is that forecast developed from the utilities' historic metered loads?

A-1.123. Yes, historical metered load and trends are the starting point of the load forecasts used in regulatory filings (IRP, Rate Case, etc.), but the forecast is often adjusted based upon information obtained from major accounts and economic development prospects.

The IRP is focused on total energy requirements needed to serve customer metered sales, so energy requirements and metered sales are closely related. Essentially, energy requirements are metered sales plus losses. The Companies use a bottom-up approach to load forecasting that starts with forecasts of billed month metered sales by rate. The forecast models are specified using historical billed month metered sales. The sales forecasts are adjusted for major account and economic development changes, converted to calendar month, aggregated by company, and grossed up for losses to calculate calendar month energy requirements used in IRP planning.

KENTUCKY UTILITIES COMPANY

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Question No. 1.124

Responding Witness: Charles R. Schram

Q-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?

A-1.124. The forecasted output of rooftop solar is used to reduce the load forecast. Therefore, it is not included as a generation resource.

KENTUCKY UTILITIES COMPANY

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Case No. 2025-00113

Question No. 1.125

Responding Witness: Charles R. Schram

Q-1.125. In preparing the generation resource plan for the IRP, is the rooftop solar generation included as a generation resource?

A-1.125. See the response to Question No. 1.124.

KENTUCKY UTILITIES COMPANY

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Case No. 2025-00113

Question No. 1.126

Responding Witness: Charles R. Schram

Q-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?

A-1.126. As discussed in the response to Question No. 1.123, the load forecast used for determination of the planning reserve margin begins with historical metered loads. The Companies' planning reserve margin in the 2024 IRP is 23% in the summer and 29% in the winter based on a loss-of-load expectation of one or fewer days in 10 years.

KENTUCKY UTILITIES COMPANY

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Case No. 2025-00113

Question No. 1.127

Responding Witness: Elizabeth J. McFarland / Charles R. Schram

Q-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?

A-1.127. The Companies jointly dispatch their generation fleet. The Companies are unaware of a "NERC recommended 7% operational reserve margin" except in the context of Western Electricity Coordinating Council ("WECC") Regional Reliability Standard BAL-STD-002-0 which pertained to contingency reserves, never applied to the Companies, and has since been superseded. Also see the response to Question No. 1.128.

KENTUCKY UTILITIES COMPANY

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Case No. 2025-00113

Question No. 1.128

Responding Witness: Elizabeth J. McFarland / Charles R. Schram

Q-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?

A-1.128. The Companies interpret operational reserve margin as specific to generation reserves. The Companies' Operating Reserve (as defined by NERC) target does not change with customer load. The Companies are required to maintain Contingency Reserves in the amount allotted to them by the TEE Contingency Reserve Sharing Group (TCRSG), currently 211 MW. Above that, the Companies currently target an additional 75 MW of Operating Reserve - Spinning for regulation and frequency response.

KENTUCKY UTILITIES COMPANY

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Case No. 2025-00113

Question No. 1.129

Responding Witness: Charles R. Schram

Q-1.129. Do LG&E and KU make any adjustments to the operational reserve margin for the presence of rooftop solar generation?

A-1.129. No. See the response to Question No. 1.128.

KENTUCKY UTILITIES COMPANY

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Case No. 2025-00113

Question No. 1.130

Responding Witness: Charles R. Schram

Q-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?

A-1.130. No. See the response to Question No. 1.128.

KENTUCKY UTILITIES COMPANY

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Case No. 2025-00113

Question No. 1.131

Responding Witness: Shannon L. Montgomery / Peter W. Waldrab

Q-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.

A-1.131. Yes. See the response to Question No. 1.100.

KENTUCKY UTILITIES COMPANY

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and Mountain Association 's Initial Request for Information
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Case No. 2025-00113

Question No. 1.132

Responding Witness: Peter W. Waldrab

Q-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?

A-1.132. No, the Company uses standard equipment ratings to determine the capacity on each circuit. The Company assesses actual loading levels from SCADA data during summer and winter peak against ratings. Where new customer load is added, that is considered against prior loading levels and equipment ratings. New investment is scheduled to be completed the year loads are expected to exceed any equipment ratings under normal seasonal peak conditions. The Companies do not use a margin of excess distribution capacity.

KENTUCKY UTILITIES COMPANY

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Case No. 2025-00113

Question No. 1.133

Responding Witness: Peter W. Waldrab

Q-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.

A-1.133. See attachment being provided in a separate file. The attached file contains the SCADA data for Company circuits with all available data.

KENTUCKY UTILITIES COMPANY

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Case No. 2025-00113

Question No. 1.134

Responding Witness: Peter W. Waldrab

Q-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.

A-1.134. The Company does not forecast by distribution circuit.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
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Case No. 2025-00113

Question No. 1.135

Responding Witness: Charles R. Schram

Q-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."

A-1.135.

- a. The timing of reaching the 1% can be approximated using the current level of installed NMS capacity and the NMS forecast model. Total NMS forecast capacity by company, as calculated by taking the forecasted customers multiplied by the average capacity by rate and summed by company, is compared to 1% of the actual or forecasted peaks for each year. The cap is said to be hit if total cumulative installed capacity in that year reaches this amount. See the response to Question No. 1.100 part (h) for annual capacity % of the prior year's peak.
- b. As mentioned in the 2025 CPCN, solar adoption growth has slowed, and overall capacity is coming in lower than what would be expected by the Companies' distributed solar forecasts. Should NMS adoptions in the KU service territory continue at the rate experienced from May 2024-April 2025, KU would reach the 1% level sometime between 2029 and 2031. This will be dependent upon what levels of data center load locate within the KU service territory, as this could have an impact on the peaks and thus the 1% level. Another variable is weather. KU's service territory peaks in the winter months, so should weather be mild and result in a low winter peak in a given year, KU would be more likely to reach the 1% level in that year.

- c. The Companies included a Solar for All topside adjustment in the final step of the distributed solar capacity forecast used in the Rate Case load forecast. The assumption was these grant funds would begin to be distributed in 2025, but as of the date of this response, these funds are still not available to Kentucky customers.

KENTUCKY UTILITIES COMPANY

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Question No. 1.136

Responding Witness: Charles R. Schram

Q-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.”

A-1.136. In 2021, the Companies used the AMI sample of customers available to evaluate the economics of distributed generation in various years, tax incentives (0% and 26%), export credit scenarios (QF and NMS), etc. The results of this analysis suggested the number of customers adopting would not be as affected under QF versus NMS, but the installed capacity size was reduced consistently moving from NMS to QF. See attachment being provided in a separate file.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
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Case No. 2025-00113

Question No. 1.137

Responding Witness: Robert M. Conroy / Charles R. Schram

Q-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.

A-1.137. Yes, the Companies’ High Case Solar Scenario from the 2024 IRP contemplates continuing to offer NMS-2 beyond the 1% level. See attachment being provided in a separate file for a summary of the high case capacity forecast.

KENTUCKY UTILITIES COMPANY

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Question No. 1.138

Responding Witness: Charles R. Schram

Q-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.”

A-1.138. Regarding distributed energy storage, although batteries may be the most feasible of all options in terms of physical location, their ROI is not competitive when compared to solar under the Companies’ current rate design.² Batteries can only increase total energy consumption for residential customers due to AC-to-DC losses when charging and DC-to-AC losses when discharging. Given that the vast majority of residential customers take service under Rate RS, which has a flat rate per kWh and no demand charge, this can only mean a more expensive energy proposition for the battery alone for most of the Companies’ residential customers. For those on residential time-of-day energy rates or net metering, the disparity between the peak and off-peak rates or the tariff rate and the net metering sellback rate is unlikely to justify the up-front cost. Certainly, that rate difference has not proven to be an incentive for customers to date: Of the 17 customers on the Companies’ residential time-of-day rates, 17 are net metering customers and zero have battery storage systems.

Putting aside economics, some customers may purchase battery storage as a backup power supply. But if a customer uses a battery solely as a backup power supply, i.e., it discharges only during power outages, by definition it can only increase demand; it can never help reduce demand. Thus, although such a battery

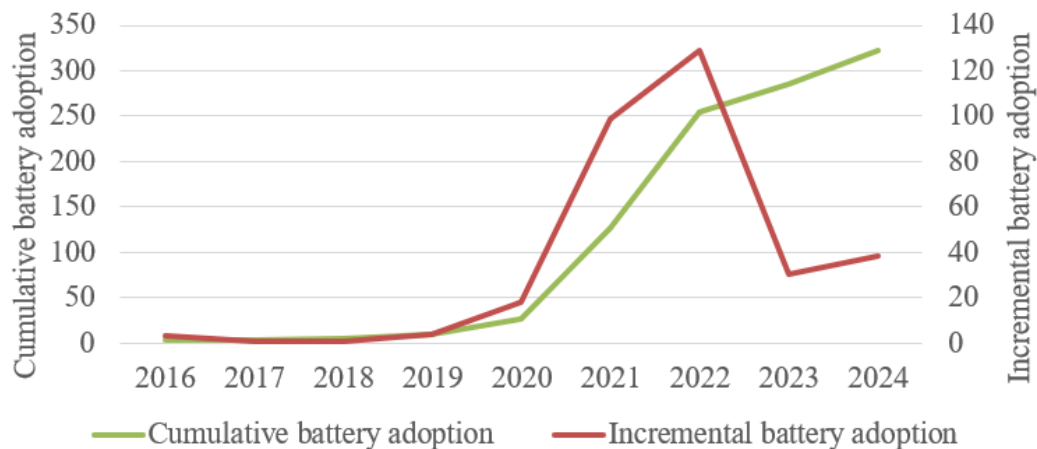
² See, e.g., DNV and Z Federal, “Distributed Generation, Battery, and Combined Heat and Power Research –Final Report” at 43 (Mar. 22, 2024) (prepared for U.S. Department of Energy, U.S. Energy Information Administration, Office of Energy Analysis), available at https://www.eia.gov/analysis/studies/buildings/dg_storage_chp/pdf/dg_storage_chp.pdf (accessed Jan. 19, 2025):

While solar PV benefits from being a familiar option to customers as method of procuring clean energy under favorable economic conditions, battery storage systems are typically not purchased solely on the basis of customer economics. Adoption of battery storage systems by customers is largely dependent on the value the customer places on accessing reliable backup power. Thus, battery storage adoption is more closely linked to the customer’s perception and quantification of resiliency needs

can affect the Companies' load forecast, it would be minimal and could only increase the customer's demand and energy requirements.

Regardless, based on the data available to the Companies, batteries have not proven to be particularly attractive to the Companies' customers to date: The Companies' net metering customers had only 2,481 kW of distributed battery storage capacity across 323 installations at the end of 2024, which is only about 6% of the Companies' net metering customer base and less than 0.03% of all customers. The Companies' 6% rate of battery storage attachment to solar installations is neither uncommon nor surprising. According to Berkeley Lab, most states other than Hawaii and California have residential battery attachment rates between 4% and 10% and non-residential battery attachment rates below 2%.³

The figure below shows the cumulative and incremental number of net metering solar customers with battery installations by year. Notably, after an uptick in 2021 and 2022, incremental battery storage adoption in 2023 significantly decreased. Incremental battery storage adoption was slightly higher in 2024 compared to 2023 but nowhere near the adoption levels seen in 2021 or 2022.



³ Berkeley Lab, "Tracking the Sun: Pricing and Design Trends for Distributed Photovoltaic Systems in the United States, 2024 Edition" at 20 (Aug. 2024), available at https://emp.lbl.gov/sites/default/files/2024-10/Tracking%20the%20Sun%202024_Report.pdf (accessed July 11, 2025).

KENTUCKY UTILITIES COMPANY

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Case No. 2025-00113

Question No. 1.139

Responding Witness: Peter W. Waldrab

Q-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.

A-1.139. See attachment being provided in a separate file.

KENTUCKY UTILITIES COMPANY

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Question No. 1.140

Responding Witness: Peter W. Waldrab

Q-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.

A-1.140. See attachment being provided in a separate file.

KENTUCKY UTILITIES COMPANY

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Question No. 1.141

Responding Witness: Peter W. Waldrab

Q-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.

A-1.141.

- a. See attachments being provided in separate files.
- b. See attachment being provided in a separate file.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
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Question No. 1.142

Responding Witness: Peter W. Waldrab

- Q-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.”
- A-1.142. The Companies utilize Risk Return on Investment (RROI) as described in Exhibit PWW-2 page 16. Additionally, the Companies utilize advanced analytics to highlight line segments of the Distribution system for targeted improvements within reliability/resiliency investments.

KENTUCKY UTILITIES COMPANY

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Question No. 1.143

Responding Witness: Robert M. Conroy

Q-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."

A-1.143. See the Direct Testimony of Robert M. Conroy at page 2 and the Direct Testimony of John R. Crockett at page 3.

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Question No. 1.144

Responding Witness: Robert M. Conroy / Andrea M. Fackler

Q-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"?

A-1.144. See the Direct Testimony of Andrea M. Fackler at page 36, line 11, through page 37, line 3.

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Case No. 2025-00113

Question No. 1.145

Responding Witness: Robert M. Conroy / Christopher M. Garrett

Q-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?

A-1.145. The Company's reasonable operating expenses are those prudently incurred expenses necessary to provide adequate service.

- a. A reasonable level of operating activity is the activity necessary to provide adequate service.
- b. See the response to Walmart 1-9 for the current authorized return on equity. See the Direct Testimony of Dylan W. D'Ascendis for the requested return on equity in this proceeding. See also Application Tab 56, Schedule C-1, for rates of return.
- c. The Company will continue to maintain its balanced capital structure comprised of 53% equity and 47% debt with any additional profit reinvested in the business or returned to equity holders.

KENTUCKY UTILITIES COMPANY

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Case No. 2025-00113

Question No. 1.146

Responding Witness: Lonnie E. Bellar

Q-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?

A-1.146.

- a. See the response to PSC No. 2-34(a).
- b. Yes.

KENTUCKY UTILITIES COMPANY

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Question No. 1.147

Responding Witness: Elizabeth J. McFarland / Peter W. Waldrab

Q-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?

A-1.147. Given the level of proposed investment in the transmission and distribution systems, the Company anticipates several measurable improvements in grid stability:

- **First Quartile SAIDI/SAIFI Performance:** The investments would not only sustain the reliability improvement that have been achieved since 2017 but will aim to achieve first quartile performance in the System Average Interruption Duration Index (SAIDI) and System Average Interruption Frequency Index (SAIFI) within 5-10 years.
- **Reduction in Outages:** By replacing aging and end-of-life assets, the risk of sudden failures causing widespread and prolonged power disruptions will be minimized. This will benefit not only Kentucky customers but also all interconnected customers served through the Companies' transmission system.
- **Enhanced Grid Resilience:** The investments will drive down reliability risk, replace obsolete technology, and build a more resilient grid, ensuring consistent and reliable power delivery.

These improvements will be assessed and quantified through:

- **Monitoring SAIDI and SAIFI Metrics:** Regular tracking of these indices will provide a clear measure of improvements in outage duration and frequency. Distribution plans to track a rolling 10-year average all-in SAIDI performance.
- **Asset Performance Tracking:** Evaluating the performance and failure rates of replaced assets will help quantify the reduction in reliability risks.

- **Customer Satisfaction Surveys:** Surveys will gauge customer perceptions of reliability and power quality, providing direct feedback on the effectiveness of the investments.
- **Benchmarking Against Industry Standards:** Comparing performance metrics to industry standards and peer utilities will help assess the relative success of the investments.

These measures will ensure that the investments lead to tangible improvements in grid stability while maintaining a reasonable cost balance for customers.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
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Case No. 2025-00113

Question No. 1.148

Responding Witness: Shannon L. Montgomery

Q-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?

A-1.148. The Company has not assessed the potential increase in demand for its WeCare program in light of the proposed cost increases and are ready to serve customers who are eligible for this program or any of the other DSM/EE programs offered by the Company. The Company tracks program participation and can file a mid-plan adjustment to request additional budget dollars should WeCare participation outpace the 7-year budget.

As part of Case No. 2022-00402, the Company received approval to increase participation levels and budget dollars for direct install measures for the single family WeCare program. In addition, the Company began offering a new multifamily WeCare program in January 2024. The participation level between these two programs increased by 35% from levels prior to 2024.

The Company offers other residential DSM/EE programs at a no or low cost to participate including Online Marketplace, Bring Your Own Device, Residential Online Audit, and Peak Time Rebates.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
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Dated July 3, 2025

Case No. 2025-00113

Question No. 1.149

Responding Witness: Robert M. Conroy / Michael E. Hornung

Q-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?

A-1.149. The result reached in Case No. 2020-00349 was that customers who have AMI meters capable of remote disconnection and reconnection will no longer be charged the disconnect/reconnect service charge. Such provision is reflected in Sheet No. 45, Special Charges, of the Company's tariff.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
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Dated July 3, 2025

Case No. 2025-00113

Question No. 1.150

Responding Witness: Shannon L. Montgomery

Q-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.

A-1.150.

- a. See attachment being provided in a separate file.

- b. Customers paid \$1.95 per third-party cash payment. The total amount of third-party cash payment fees KU customers paid from April 2023 to May 2025 is \$709,653.75.
- c. 100% of all are fees paid to the vendor.
- d. No fees are paid to the Company.
- e. No. The vendor collected 100% of these fees. The Company collected no part of these fees as they were paid to the vendor alone. The Company proposes in this base rate case to cover the cost of cash payments after this rate case if approved.
- f. See attachment being provided in a separate file. 2022 was the last full year prior to the beginning of business offices closures.
- g. The Company has no business reason to maintain this data.
- h. See the response to part (a).
- i. See the response to part (a).

KENTUCKY UTILITIES COMPANY**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association 's Initial Request for Information****Dated July 3, 2025****Case No. 2025-00113****Question No. 1.151****Responding Witness: Shannon L. Montgomery**

Q-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.

A-1.151. For general information on the income-qualified DSM programs, see the program page here: <https://lge-ku.com/wecare>. See attachment being provided in a separate file, which was provided as Exhibit LI-6 in Case No. 2022-00402, for annual budget information. The applicable tariff is sheet number 86.

Participation and budget information:

Year Ending	WeCare for Homeowners & Renters (Customer segment: Residential customers at or below 200% of the federal poverty level)		WeCare for Apartment Owners (Customer segment: Owners of multifamily buildings with units occupied by income-qualified tenants)	
	Participants	Budget (\$000s)	Participants	Budget (\$000s)
2020	1,350	\$3,170	Program offering began in 2024	
2021	1,630	\$3,173		
2022	1,985	\$3,334		
2023	2,093	\$3,180		
2024	513	\$4,486	445	\$546
2025 through May	511	\$4,480 (full year)	30	\$556 (full year)

The Company is currently rolling out the DSM/EE programs that were approved in Case No. 2022-00402 and do not plan to file for a new DSM/EE Plan at this time. There is an opportunity to conduct pilot programs during the current 2024-2030 Plan period.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association 's Initial Request for Information**

Dated July 3, 2025

Case No. 2025-00113

Question No. 1.152

Responding Witness: Shannon L. Montgomery / Peter W. Waldrab

Q-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?

A-1.152. See the response to PSC 2-74.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association 's Initial Request for Information**

Dated July 3, 2025

Case No. 2025-00113

Question No. 1.153

Responding Witness: Shannon L. Montgomery

Q-1.153. Please provide an update on the status of the AMI rollout and what date the transition to AMI meters will be complete.

A-1.153. Through June 30, 2025, the AMI rollout is 99.1% complete for KU. The estimated completion date is December 31, 2025.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association 's Initial Request for Information**

Dated July 3, 2025

Case No. 2025-00113

Question No. 1.154

Responding Witness: Christopher M. Garrett / Shannon L. Montgomery

Q-1.154. Please identify all services and benefits customers presently receive from AMI meters.

- a. For each service or benefit, indicate the number of customers actively participating in that service, where applicable.
- b. For each service or benefit, explain if and how the AMI meter enables customers to reduce their utility costs.
- c. Have the Companies' modeled the expected bill savings customers will receive through AMI meters? Please provide all studies and associated workpapers.

A-1.154. See the response to PSC 2-74.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association 's Initial Request for Information
Dated July 3, 2025**

Case No. 2025-00113

Question No. 1.155

Responding Witness: Shannon L. Montgomery

Q-1.155. Please identify all services and benefits the Companies plan to provide in the future to customers utilizing AMI technology, including:

- a. The number of customers expected to participate in each service,
- b. The dates when these services will become available,
- c. The cost to participate in the said program or service (if a participation cost is required).

A-1.155. The AMI project will be completed in December 2025. Services provided with the initial rollout are described in the response to PSC 2-74. Additional services and benefits will be analyzed and offered in the future.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association 's Initial Request for Information**

Dated July 3, 2025

Case No. 2025-00113

Question No. 1.156

Responding Witness: Christopher M. Garrett / Shannon L. Montgomery

Q-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.

A-1.156. See the responses to PSC 2-74 and PSC 2-95.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association 's Initial Request for Information**

Dated July 3, 2025

Case No. 2025-00113

Question No. 1.157

Responding Witness: Robert M. Conroy / Charles R. Schram

Q-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?

- a. Please explain why RTO involvement is not being considered as part of the Company's strategy.

A-1.157. Yes. See the Companies' 2024 Integrated Resource Plan (Case No. 2024-00326) and the ongoing proceeding for the Companies CPCN request for new resources (Case No. 2025-00045).

- a. See the 2024 RTO Membership Analysis filed in Volume III of the 2024 IRP, which is attached to the response to DOD 1-26(a).

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association 's Initial Request for Information
Dated July 3, 2025**

Case No. 2025-00113

Question No. 1.158

Responding Witness: Robert M. Conroy

Q-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?

A-1.158. The Company ensures that its rates are fair, just, and reasonable by making prudent investments and expenditures necessary to provide adequate service.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association 's Initial Request for Information**

Dated July 3, 2025

Case No. 2025-00113

Question No. 1.159

Responding Witness: Michael E. Hornung / Counsel

Q-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.

A-1.159. The Companies object to parts (a) – (e) of this request because all responsive documents are subject to attorney-client privilege, protected from disclosure under the work product doctrine because they were prepared at the direction of counsel in preparation for this proceeding, or both. Without waiving this objection, see the response to Sierra Club 1-6.

- f. The EHLF rate was created to be revenue neutral with the RTS rate by consolidating RTS time-of-day demand rates into a single rate. Supporting analysis for RTS can be found in Mr. Lyons's cost-of-service study and in the Schedule M billing determinants attached to the response to PSC 1-54.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association 's Initial Request for Information**

Dated July 3, 2025

Case No. 2025-00113

Question No. 1.160

Responding Witness: Michael E. Hornung

Q-1.160. Please identify which ELHF rate provisions would apply during a new customer's load ramp period.

A-1.160. All EHLF tariff provisions would apply for the customers full 15 year term.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association 's Initial Request for Information
Dated July 3, 2025**

Case No. 2025-00113

Question No. 1.161

Responding Witness: Michael E. Hornung

Q-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.

A-1.161. No such contract exists.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association 's Initial Request for Information**

Dated July 3, 2025

Case No. 2025-00113

Question No. 1.162

Responding Witness: Michael E. Hornung / Counsel

Q-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%.

A-1.162. The Companies object to all parts of this request because all responsive documents are subject to attorney-client privilege, protected from disclosure under the work product doctrine because they were prepared at the direction of counsel in preparation for this proceeding, or both. Without waiving this objection, see the response to Sierra Club 1-6.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association 's Initial Request for Information**

Dated July 3, 2025

Case No. 2025-00113

Question No. 1.163

Responding Witness: Michael E. Hornung

Q-1.163. Please explain how the Company plans to determine an EHLF customer's expected average monthly load factor.

A-1.163. The customer will supply the Company with the expected average monthly load factor based on estimated future demand and energy needs.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association 's Initial Request for Information
Dated July 3, 2025**

Case No. 2025-00113

Question No. 1.164

Responding Witness: John Bevington

Q-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.

A-1.164.

- a. See the response to PSC 2-32.
- b. The expected average monthly load factor for each data center project in the economic development project pipeline is greater than 85% which matches the qualification noted in the proposed Extremely High Load Factor tariff in this case.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association 's Initial Request for Information
Dated July 3, 2025**

Case No. 2025-00113

Question No. 1.165

Responding Witness: Michael E. Hornung

Q-1.165. Identify by state and utility each specific utility tariff or rate that the Company reviewed when developing its draft EHLF provisions.

A-1.165. See the response to Sierra Club1-6.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association 's Initial Request for Information**

Dated July 3, 2025

Case No. 2025-00113

Question No. 1.166

Responding Witness: Michael E. Hornung

Q-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.

A-1.166. The 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.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association 's Initial Request for Information**

Dated July 3, 2025

Case No. 2025-00113

Question No. 1.167

Responding Witness: Michael E. Hornung

Q-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.

A-1.167. The Company includes demand response programs for non-residential customers in its Demand Side Management tariff. All current and future programs will be offered through this tariff.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association 's Initial Request for Information**

Dated July 3, 2025

Case No. 2025-00113

Question No. 1.168

Responding Witness: Michael E. Hornung

Q-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.

A-1.168. Customers have clean or renewable energy resource opportunities addressed through the Companies' Qualifying Facilities, Green, and Solar Share tariffs.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association 's Initial Request for Information**

Dated July 3, 2025

Case No. 2025-00113

Question No. 1.169

Responding Witness: Michael E. Hornung

Q-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.

A-1.169. Contributions for upgrades to transmission and distribution facilities are covered under the Companies' Terms and Conditions Tariffs for Line Extensions and Excess Facilities.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association 's Initial Request for Information**

Dated July 3, 2025

Case No. 2025-00113

Question No. 1.170

Responding Witness: Michael E. Hornung

Q-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.

- a. The Company's revenue;
- b. The Company's expenses;
- c. The Company's net income or profit;
- d. The Company's cost of service study results, including cost allocation to customer classes;
- e. Cost-shifting or cross-subsidization among customer classes; and
- f. Residential rate or bill impacts.

A-1.170.

- a. The Company has not performed the requested analysis for the proposed Rate EHLF. The attachment being provided in a separate file is a simplified, merely indicative Rate EHLF revenue analysis the Company previously performed using LG&E RTS rates for a hypothetical 402 MW customer that assumes no ramp.
- b. No such analysis has been performed.
- c. No such analysis has been performed.
- d. The Companies' cost of service analysis was conducted under the assumption that there would be no customers utilizing the EHLF rate for this case's test year, thereby resulting in no cost allocation to any customer classes.
- e. See the response to part (d).
- f. No such analysis has been performed.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association 's Initial Request for Information
Dated July 3, 2025**

Case No. 2025-00113

Question No. 1.171

Responding Witness: John Bevington / Charles R. Schram

Q-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.

- a. 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.

A-1.171. To date, the Company has not been able to obtain data center load shapes from other utilities. However, due to the uncertainty of operations of data centers served by other utilities today, the Company believes it is most reasonable to use assumptions provided to the Company by the prospective data center customers themselves.

- a. The Company has attempted to reach out to Itron to obtain load shapes of data center customers. However, since most utilities consider customer-specific data to be confidential, Itron has not been able to provide data center load shapes to share with the Company up to this point. The Companies assume, however, that a customer qualifying for the EHLF tariff will have a high load factor and thus a relatively flat load shape.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association 's Initial Request for Information
Dated July 3, 2025**

Case No. 2025-00113

Question No. 1.172

Responding Witness: John Bevington / Elizabeth J. McFarland

Q-1.172. Please identify each type of cost associated with interconnecting a new EHLF customer.

- a. For each type of cost, please identify whether it is directly assigned to the prospective customer load.
- b. Please describe and identify the range of total interconnection costs for a prospective new EHLF customer.

A-1.172. Typical costs associated with interconnecting a new EHLF customer can be categorized into the following types:

- Interconnection Study Costs
- Network Facility Costs
- End-User Facility Costs

- a. Interconnection Study Costs are paid for by the Companies and reimbursed from the customer.

Network Facility costs are “network” in nature, meaning the facilities enhance the overall reliability of the grid and are an ultimate benefit to all users of the transmission system. Network costs are borne by the Transmission Owner as outlined in the Company’s *Allocation of Costs for End-User Interconnections* which can be found on the Company’s OASIS website.

End-User Facility costs are for the facilities built, owned, and maintained by the end-user customer. These costs are borne by the end-user customer.

- b. The range of total interconnection costs for a prospective new EHLF customer can vary significantly and depends on many factors including, but not limited to, the service location the customer is requesting, including the proximity of the load to existing transmission infrastructure, any right-of-way requirements, the delivery voltage at the point of interconnection, and the available capacity on the transmission system.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association 's Initial Request for Information
Dated July 3, 2025**

Case No. 2025-00113

Question No. 1.173

Responding Witness: Robert M. Conroy

Q-1.173. Please identify each type of cost associated with building and interconnecting new energy resources to serve new EHLF customers.

- a. For each type of cost, please identify if there is any circumstance under which the cost is directly assigned to the prospective EHLF customer.
- b. Please describe and identify the range of total new energy resources costs for a prospective EHLF customer.

A-1.173. With the exception of purely voluntary, elective renewable generation resources individual customers ask the Company to acquire that are above and beyond what is required to provide safe and reliable service at the lowest reasonable cost (e.g., the Solar Share Program, Business Solar, and Green Tariff Option #3), the Company does not have generation resources dedicated to a particular customer or group of customers. Rather, except those elective generation resources—for which the requesting customers pay—all customers benefit from *all* of the Company's generation resources, and they appropriately pay cost-based rates for those resources based on allocations of those costs determined in fully allocated embedded cost of service studies.⁴ Therefore, there are no costs responsive to this request.

- a. Not applicable.
- b. Not applicable.

⁴ See, e.g., *General Adjustment of Electric Rates of East Kentucky Power Cooperative, Inc.*, Case No. 2006-00472, Order at 36-37 (Ky. PSC Dec. 5, 2007) (“EKPC filed a fully allocated, embedded cost-of-service study in order to determine the contribution that each customer class was making toward its overall rate of return and as an indicator of whether its rates reflect the cost to serve each customer class. ... The Commission finds that EKPC’s cost-of-service study is reasonable and consistent with the methodology accepted in previous rate cases”).

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association 's Initial Request for Information**

Dated July 3, 2025

Case No. 2025-00113

Question No. 1.174

Responding Witness: John Bevington

Q-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?

A-1.174. No. The Company expects EHLF customers to take service at the Transmission Level.

KENTUCKY UTILITIES COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Mountain Association 's Initial Request for Information
Dated July 3, 2025**

Case No. 2025-00113

Question No. 1.175

Responding Witness: Charles R. Schram / Counsel

Q-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.

A-1.175. The Company objects to this request as irrelevant; none of the resources proposed in Case No. 2025-00045 are included in the base or test years at issue in this proceeding, much less resources beyond those proposed in Case No. 2025-00045. Without waiving this objection, the Company states that for the 1,750 MW of data center load included in the load forecast in Case No. 2025-00045, the Company does not presently anticipate needing additional resources to serve EHLF customers beyond those proposed in that case.

- a. Not applicable.