COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matters of:

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

-and-

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

EMERGENCY JOINT MOTION OF ATTORNEY GENERAL AND KIUC FOR A TWO-WEEK EXTENSION OF TIME TO FILE THEIR REVENUE REQUIREMENTS TESTIMONY BASED ON APPLICANTS' MAJOR CHANGES TO REVENUE REQUIREMENT MODEL

The Attorney General of the Commonwealth of Kentucky, through his Office of Rate Intervention ("OAG"), and the Kentucky Industrial Utility Customers, each by counsel, (hereinafter jointly referred to as "OAG-KIUC") hereby jointly and respectfully request that the Commission grant them a two-week extension of time within which to file their joint direct testimony regarding revenue requirements from Mr. Lane Kollen, separate from rate of return. OAG-KIUC state as follows in support of this motion.

The Commission's June 18, 2025 procedural schedule issued in both dockets allowed for two rounds of discovery based on the application as filed, which have now been completed. The procedural schedule also provided that any intervenor testimony be filed no later than August 29, 2025. The OAG-KIUC have retained four witnesses to provide testimony in these two dockets: Lane Kollen and Randy Futral as to revenue requirements; Richard Baudino regarding rate of return; and Stephen J. Baron regarding cost of service and

rate design. OAG-KIUC believe that, based on data requests from other intervenors in these dockets, it does not appear that any other intervenor will be sponsoring witnesses devoted solely to revenue requirements.

On August 25, 2025 the Companies filed into both dockets significant revisions to their revenue requirements models, supported by multiple new spread sheets. OAG-KIUC's experts have not had any opportunity to submit new data requests based upon this substantial new data, but it is readily apparent that the Companies' updated revenue requirement model will affect the calculations and analyses Mr. Kollen will utilize in drafting his testimony. This will require Mr. Kollen to expend additional time and effort to re-work his analyses and calculations, necessitating major revisions to his draft testimony in order to provide the Commission with relevant and coherent testimony based upon the latest data.

OAG-KIUC remain prepared to file the testimony of Messrs. Baudino, Baron and Futral on the original due date, but respectfully request an extension of time for Mr. Kollen's testimony to be filed. All other dates in the existing procedural schedule would remain unchanged. OAG-KIUC believe that granting this extension would not prejudice any other party. Therefore, OAG-KIUC respectfully request that the Commission amend the procedural schedule to reflect an extension of time for Mr. Kollen's testimony to be filed. Counsel for LG&E-KU has advised that the Companies have no objection to this motion, and has authorized OAG-KIUC to represent such.

Intervenor Testimony (other than OAG-KIUC revenue requirements testimony from Lane Kollen) shall be filed no later than……08/29/2025

OAG-KIUC Testimony of Lane Kollen shall be filed…… 09/09/2025

Respectfully submitted,
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Certificate of Service

Pursuant to the Commission's Orders in Case No. 2020-00085, and in accord with all other applicable law, Counsel certifies that an electronic copy of the forgoing was served and filed by e-mail to the parties of record.

This 26th day of August, 2025

Assistant Attorney General