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
THE COMMISSION STAFF'S POST-HEARING REQUEST FOR INFORMATION

DATED NOVEMBER 12, 2025

FILED: NOVEMBER 25, 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 20th day of November 2025.

____
Notary Public

Notary Public ID No. KYNP63286

My Commission Expires:

January 22, 2027

CAROLINE J. DAVISON
COMM EXPIRES 1/22/2027
NOTARY PUBLIC
ID # KYNP63286
STATE AT LARGE, KENTUCKY

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 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.

John Bevington

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 18th day of November 2025.

Caroline J Davison
Notary Public

Notary Public ID No. KYNP63286

My Commission Expires:

January 22, 2027

CAROLINE J. DAVISON
COMM EXPIRES 01/22/2027
NOTARY PUBLIC
ID # KYNP63286
STATE AT LARGE, KENTUCKY

VERIFICATION

COMMONWEALTH OF KENTUCKY)
)
COUNTY OF JEFFERSON)

The undersigned, **Robert M. Conroy**, being duly sworn, deposes and says that he is Vice President, State Regulation and Rates, 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.

____
Robert M. Conroy

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 21st day of November 2025.

____
Notary Public

Notary Public ID No. KYNP61560

My Commission Expires:

November 9, 2026

TAMMY J. ELZY
COMM EXPIRES 11/09/2026
NOTARY PUBLIC
ID # KYNP61560
STATE AT LARGE, KENTUCKY

VERIFICATION

STATE OF NEW JERSEY)
)
COUNTY OF CAMDEN)

The undersigned, **Dylan W. D'Ascendis**, 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.

Dylan W. D'Ascendis

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 18th day of November 2025.

Notary Public

Notary Public ID No. 2416714

My Commission Expires:

February 1, 2027

Joyce E Kelly
NOTARY PUBLIC
State of New Jersey
ID # 2416714
My Commission Expires 2/1/2027

VERIFICATION

COMMONWEALTH OF KENTUCKY)
)
COUNTY OF JEFFERSON)

The undersigned, **Andrea M. Fackler**, being duly sworn, deposes and says that she is Manager - Revenue Requirement/Cost of Service for LG&E and KU Services Company, that she has personal knowledge of the matters set forth in the responses for which she is identified as the witness, and the answers contained therein are true and correct to the best of her information, knowledge, and belief.

Andrea M. Fackler
Andrea M. Fackler

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 24th day of November 2025.

Caroline J. Davison
Notary Public

Notary Public ID No. KYNP63286

My Commission Expires:

January 22, 2027

CAROLINE J. DAVISON
COMM EXPIRES 01/22/2027
NOTARY PUBLIC
ID # KYNP63286
STATE AT LARGE, KENTUCKY

VERIFICATION

COMMONWEALTH OF KENTUCKY)
)
COUNTY OF JEFFERSON)

The undersigned, **Christopher M. Garrett**, being duly sworn, deposes and says that he is Vice President – Financial Strategy & Chief Risk Officer for PPL Services Corporation and Vice President, Finance and Accounting, for Kentucky Utilities Company and Louisville Gas and Electric Company 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 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.

Christopher M. Garrett

Christopher M. Garrett

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 21st day of November 2025.

Tammy J. Elzy

Notary Public

Notary Public ID No. KYNP61560

My Commission Expires:

November 9, 2026

TAMMY J. ELZY
COMM EXPIRES 11/09/2026
NOTARY PUBLIC
ID # KYNP61560
STATE AT LARGE, KENTUCKY

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 18th day of November 2025.

Caroline J. Davison
Notary Public

Notary Public ID No. KYNP63286

My Commission Expires:

January 22, 2027

CAROLINE J. DAVISON
COMM EXPIRES 01/22/2027
NOTARY PUBLIC
ID # KYNP63286
STATE AT LARGE, KENTUCKY

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

Timothy S. Lyons

On this 25th day of November, 2025, before me, the undersigned notary public, personally appeared **Timothy S. Lyons**, proved to me through satisfactory evidence of identification, which were VT Drivers License, to be the person whose name is signed on the preceding or attached document in my presence.

(seal)

Holly B. Rees
Commission No. 157.0015375
Notary Public State of Vermont

Exp 1/31/27

Notary Public Signature

VERIFICATION

COMMONWEALTH OF KENTUCKY)
)
COUNTY OF JEFFERSON)

The undersigned, **Heather D. Metts**, being duly sworn, deposes and says that she is Director – Financial Planning and Budgeting for Kentucky Utilities Company and Louisville Gas and Electric Company and an employee of LG&E and KU Services Company, that she has personal knowledge of the matters set forth in the responses for which she is identified as the witness, and the answers contained therein are true and correct to the best of her information, knowledge and belief.

Heather D. Metts

Heather D. Metts

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 21st day of November 2025.

Tammy J. Elzy

Notary Public

Notary Public, ID No. KYNP61560

My Commission Expires:

November 9, 2026

TAMMY J. ELZY
COMM EXPIRES 11/09/2026
NOTARY PUBLIC
ID # KYNP61560
STATE AT LARGE, KENTUCKY

VERIFICATION

COMMONWEALTH OF KENTUCKY)
)
COUNTY OF JEFFERSON)

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

Shannon Montgomery
Shannon L. Montgomery

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 18th day of November 2025.

Caroline J. Davison
Notary Public

Notary Public ID No. KYNP63286

My Commission Expires:

January 22, 2027

CAROLINE J. DAVISON
COMM EXPIRES 01/22/2027
NOTARY PUBLIC
ID # KYNP63286
STATE AT LARGE, KENTUCKY

VERIFICATION

COMMONWEALTH OF PENNSYLVANIA)
)
COUNTY OF LEHIGH)

The undersigned, **Vincent T. Poplaski**, being duly sworn, deposes and says that he is Vice President Total Rewards 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 foregoing response, and that the answers contained therein are true and correct to the best of his information, knowledge, and belief.

Vincent T. Poplaski
Vincent T. Poplaski (Nov 19, 2025 09:30:53 EST)
Vincent T. Poplaski

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 21 day of November, 2025.

Commonwealth of Pennsylvania - Notary Seal
Sharon L. Fazio, Notary Public
Bucks County
My commission expires January 31, 2027
Commission number 1343431
Member, Pennsylvania Association of Notaries

Sharon L. Fazio
Notary Public

Notary Public, ID No. 1343431
(SEAL)

My Commission Expires: 1/31/2027

VERIFICATION

COMMONWEALTH OF KENTUCKY)
)
COUNTY OF JEFFERSON)

The undersigned, **Charles R. Schram**, being duly sworn, deposes and says that he is Vice President –Energy Supply and Analysis for Kentucky Utilities Company and Louisville Gas and Electric Company and is 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.

Charles R Schram

Charles R. Schram

Subscribed and sworn to before me, a Notary Public in and before said County and State this 18th day of November 2025.

Jennifer Lynn Vincent

Notary Public

Notary Public ID No. KYNP32193

My Commission Expires:

06-25-2029

JENNIFER LYNN VINCENT
NOTARY PUBLIC
Commonwealth of Kentucky
Commission # KYNP32193
My Commission Expires 6/25/2029

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 18th day of November 2025.

Caroline J. Davison
Notary Public

Notary Public ID No. KYNP63286

My Commission Expires:

January 22, 2027

CAROLINE J. DAVISON
COMM EXPIRES 01/22/2027
NOTARY PUBLIC
ID # KYNP63286
STATE AT LARGE, KENTUCKY

KENTUCKY UTILITIES COMPANY

Response to Commission Staff's Post-Hearing Request for Information
Dated November 12, 2025

Case No. 2025-00113

Question No. 1

Responding Witness: Andrea M. Fackler

Q-1. Refer to the Stipulation, Exhibit 1, KU Electric Revenue Allocation and Rate Design Schedules.

a. Provide the Exhibit in Excel spreadsheet format with all formulas, rows, and columns unprotected and fully accessible.

b. Provide a table that compares the percentage of class revenue allocation for the fixed and volumetric charges of each rate class between the stipulation and application.

c. Provide a table that compares the percentage of revenue allocation to each rate class between the stipulation and application.

A-1.

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

b. See attachment being provided in a separate file. The Company is providing the percentages broken out between basic service charge, energy, and demand to align with the Schedule M billing determinant files.

c. See attachment being provided in a separate file. The total revenues for each rate class uses the data provided in response to part (b).

KENTUCKY UTILITIES COMPANY

Response to Commission Staff's Post-Hearing Request for Information
Dated November 12, 2025

Case No. 2025-00113

Question No. 2

Responding Witness: Timothy S. Lyons

Q-2. Refer to the Hearing Testimony of Tim S. Lyons (Lyons Hearing Testimony). Conduct a Federal Energy Regulatory Commission (FERC) 12 Coincident Peak (CP) test for KU and indicate if, those results support a 12 CP allocation or another allocation, with a detailed rationale.

A-2. See attachment being provided in a separate file.

The file contains calculation of the three tests that FERC has used to consider whether a 12 CP method is appropriate for a given system. The tests are:

- Test 1: On/Off Peak
- Test 2: Low/ Annual Peak
- Test 3: Average/ Annual Peak

The tests show for KU the 12-CP thresholds are met in two of the three tests. The results of Test 2 of 65.77 percent are below the threshold of 66.00 percent. In addition, the results of Test 3 of 81.08 percent are just slightly above the threshold of 81.00 percent. Thus, there is not definitive support for utilizing the 12-CP method.

The Company continues to support use of the 6-CP method since it reflects the Company's seasonal demands in the winter and summer months.

KENTUCKY UTILITIES COMPANY

Response to Commission Staff's Post-Hearing Request for Information
Dated November 12, 2025

Case No. 2025-00113

Question No. 3

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

Q-3. Refer to the Hearing Testimony of Robert M. Conroy (Conroy Hearing Testimony). Provide the Generation Cost Recovery (GCR) billing factor and estimated bill impact for the year 2031.

A-3. See the response to Question No. 4.

KENTUCKY UTILITIES COMPANY

Response to Commission Staff's Post-Hearing Request for Information
Dated November 12, 2025

Case No. 2025-00113

Question No. 4

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

Q-4. Refer to Conroy Hearing Testimony. Provide the GCR adjustment clause estimated monthly bill impact for the years 2026, 2027, 2028, 2029, 2030, 2031, and 2032.

A-4. See attachment being provided in a separate file for the estimated monthly and annual bill impacts. Note that customers will benefit from lower fuel adjustment clause costs provided by low-cost energy from the units for which the Companies will recover costs through the GCR adjustment clause, which reduced fuel costs will automatically flow through to customers. The Companies expect these benefits will be more than $60 million per year on average from 2028 through 2035 (across both Companies, not just for KU), and they are not included in the preliminary bill analysis.[2]

[2] Joint Supplemental Testimony of Robert M. Conroy and Christopher M. Garrett at 8 (Oct. 31, 2025).

KENTUCKY UTILITIES COMPANY

Response to Commission Staff's Post-Hearing Request for Information
Dated November 12, 2025

Case No. 2025-00113

Question No. 5

Responding Witness: Lonnie E. Bellar / Robert M. Conroy / Andrea M. Fackler

Q-5. Refer to Conroy Hearing Testimony. Provide the Mill Creek 2 adjustment clause estimated monthly bill impact for the years 2026, 2027, 2028, 2029, 2030, 2031, and 2032. Include in the response any assumptions made with regard to the stay-open costs of Mill Creek 2.

A-5. Not applicable. The Mill Creek 2 adjustment clause is only applicable to LG&E given its 100% ownership share.

KENTUCKY UTILITIES COMPANY

Response to Commission Staff's Post-Hearing Request for Information Dated November 12, 2025

Case No. 2025-00113

Question No. 6

Responding Witness: Christopher M. Garrett

Q-6. Refer to Conroy Hearing Testimony. Provide the earned return on equity for KU, by month, for the years 2020, 2021, 2022, 2023, 2024, and 2025, year to date calculated in the same manner as proposed for the sharing mechanism.

A-6. KU's total company earned annual return on equity for 2020-2024 has been provided in filing requirement Section 16(8)(k) and as an attachment to the response to DOD 1-8. The ROE for the period of November 2024 – October 2025 is 10.18%

The Companies do not calculate earned returns on equity for Kentucky base rates on a monthly or annual basis absent a rate case filing.[3] Currently, the Companies only calculate earned returns on a total Company basis which is referenced above. Importantly, these returns do not account for the various proforma and jurisdictional adjustments needed to complete the calculation in a manner consistent with the sharing mechanism. Additionally, the Companies believe monthly return on equity calculations are not particularly useful given monthly returns would need to be annualized for comparative purposes to the stipulated ROEs of 9.40% and 10.15% for the sharing mechanism. Annualization would likely result in returns being above the ROE thresholds during peak usage months (summer and winter) and below the thresholds during shoulder months (spring and fall).

[3] Determining the earned base rate ROE in a manner consistent with the sharing mechanism would entail updating all the Schedules included in Exhibit 3 on an annual basis for the years requested. This would include making all the various proforma and jurisdictional adjustments included in the current rate case proceeding for each of those years requested. This calculation has not been performed and could not be done so in a timely manner given the extensive nature of the various adjustments needed to be performed. This is the primary reason the sharing mechanism provides the Companies an additional month to complete the calculation compared to other mechanism filings (Reporting Period ends July 31, 2028 with Earnings Report due October 1, 2028).

KENTUCKY UTILITIES COMPANY

Response to Commission Staff's Post-Hearing Request for Information
Dated November 12, 2025

Case No. 2025-00113

Question No. 7

Responding Witness: Christopher M. Garrett

Q-7. Refer to Conroy Hearing Testimony. Provide an example calculation for how revenue would be normalized over the 13-month sharing mechanism period.

A-7. See attachment being provided in a separate file. The example calculation uses actual base non-fuel revenues from July 2024 through July 2025 and customer counts from June 2024 through July 2025 as a proxy for the future sharing mechanism period of July 2027 through July 2028. Normalizing the July 2028 revenues to reflect an average month of usage is necessary because the Companies do not recover their base rate revenue requirement symmetrically across months. July is typically an above average usage month for Kentucky Utilities, resulting in more than one-twelfth of the revenue requirement being recovered in July.

KENTUCKY UTILITIES COMPANY

Response to Commission Staff's Post-Hearing Request for Information
Dated November 12, 2025

Case No. 2025-00113

Question No. 8

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

Q-8. Refer to Conroy Hearing Testimony. Provide an updated analysis that compares the group 1 and group 2 methodology, used in the environmental cost recovery mechanism (ECR) and proposed in the GCR, to the cost allocation utilized in a base rate case. In this comparison, update the analysis to include the extremely high load factor (EHLF) customers in group 2, as proposed in this case.

A-8. See the response to JI 4.1. See the attachment being provided in a separate file that shows the allocation of GCR revenue requirements for 2027 through 2032 using the proposed Group 1/Group 2 methodology and using base rate test year allocators from the Companies' class cost of service study filed with the application in this proceeding. The Group 1/Group 2 methodology uses the stipulated revenues to determine the allocation of GCR revenue requirements by rate class. The Companies do not currently have any customers taking service under the proposed EHLF tariff and do not have any forecasted during the test year. Therefore, while placeholders are included for the EHLF tariff, the resulting allocators are zero and no costs are allocated to this rate class.

KENTUCKY UTILITIES COMPANY

Response to Commission Staff's Post-Hearing Request for Information Dated November 12, 2025

Case No. 2025-00113

Question No. 9

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

Q-9. Refer to Conroy Hearing Testimony. Provide the annual storm damage expense embedded in KU's proposed base rates.

A-9. Annual storm damage expense embedded in base rates is $5.989 million (Kentucky jurisdictional).[4]

[4] See response to AG-KIUC 2-39 which provides support for *Total* KU storm damage expense of $6.439 million.

KENTUCKY UTILITIES COMPANY

Response to Commission Staff's Post-Hearing Request for Information
Dated November 12, 2025

Case No. 2025-00113

Question No. 10

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

Q-10. Refer to Conroy Hearing Testimony. Provide the percentage of revenue allocation for all classes between the fixed and volumetric charges. Additionally, include the amount of eliminated subsidization for each class.

A-10. See attachment being provided in a separate file. The Company is providing the percentages broken out between basic service charge (customer), energy (commodity), and demand. Because it is unclear whether "the amount of eliminated subsidization for each class" intends to refer to inter-class subsidies, intra-class subsidies, or both, the attachment provides forecasted revenue across the three rate components listed above for current rates, stipulated rates, and cost of service-based rates (based on the Company's application). This provides an indication of movement relative to cost of service between current and stipulated rates.

KENTUCKY UTILITIES COMPANY

Response to Commission Staff's Post-Hearing Request for Information
Dated November 12, 2025

Case No. 2025-00113

Question No. 11

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

Q-11. Refer to Conroy Hearing Testimony. Provide the annual proposed vegetation management expense imbedded in KU's base rates.

A-11. Annual vegetation management expense as filed in this case is $28.874 million for KU (Kentucky jurisdictional). Annual vegetation management expense in the Stipulation is reduced by $8.779 million to $20.095 million (Kentucky jurisdictional).[5]

[5] See response to AG-KIUC 2-41 which provides support for *Total* KU vegetation management expense of $31.450 million inclusive of a $9.520 million proforma adjustment which was removed as part of the Stipulation.

KENTUCKY UTILITIES COMPANY

Response to Commission Staff's Post-Hearing Request for Information
Dated November 12, 2025

Case No. 2025-00113

Question No. 12

Responding Witness: Robert M. Conroy / Christopher M. Garrett / Heather D. Metts

Q-12. Refer to Conroy Hearing Testimony. Provide the annual proposed depancaking expense imbedded in KU's base rates.

A-12. KU test year depancaking expense as filed in this case is $28.948 million (Kentucky jurisdictional - see Exhibit HDM-4 to the Rebuttal Testimony of Heather D. Metts). KU test year depancaking expense in the Stipulation is reduced by $6.313 million (for the estimated net impact of OMU's decision to join MISO) for a reduced test year amount of $22.635 million (Kentucky jurisdictional).

KENTUCKY UTILITIES COMPANY

Response to Commission Staff's Post-Hearing Request for Information Dated November 12, 2025

Case No. 2025-00113

Question No. 13

Responding Witness: Michael E. Hornung

Q-13. Provide an updated version of the Attachment to KU's response to Commission Staff's Second Request for Information (Staff's Second Request), Item 1, maintaining the same format and color coding, with the following revisions: (1) Changes made outside of this case since the case was filed that are still in effect marked in blue font; (2) Changes made as a result of discovery during this case highlighted in yellow; and (3) Changes made as a result of the stipulation, as well as the recently proposed Adjustment Clause MC2, marked in purple font. For clarity purposes, the Attachment to KU's response to Staff's Second Request, Item 1, should be the starting point, with any revisions to that document appropriately marked as described above.

A-13. See attachment being provided in a separate file.

The Company could not find a way to change individual edits to the text coloring scheme the Commission outlines above in Word. However, the Company has used the following highlighting scheme to organize the associated revisions:

1) Changes made outside of this case since the case was filed that are still in effect highlighted in light blue.
2) Changes made a result of discovery during this case highlighted in yellow.
3) Changes made as a result of the stipulation, as well as the recently proposed Adjustment Clause MC2, highlighted in light green.

The only changes made to the KU tariffs outside of this case since the case was filed that are still in effect are the KU Amended ECR changes (Sheet Nos. 87-87.1) filed on November 17, 2025, as a result of the Final Order in the CPCN case (Case No. 2025-00045).

KENTUCKY UTILITIES COMPANY

Response to Commission Staff's Post-Hearing Request for Information
Dated November 12, 2025

Case No. 2025-00113

Question No. 14

Responding Witness: Michael E. Hornung

Q-14. Provide a clean version of the tariff as currently proposed by the Stipulation and Recommendation.

A-14. See attachment being provided in a separate file. To clarify, the attachment is the clean version of the redline attachment to Question No.13.

KENTUCKY UTILITIES COMPANY

Response to Commission Staff's Post-Hearing Request for Information
Dated November 12, 2025

Case No. 2025-00113

Question No. 15

Responding Witness: Robert M. Conroy

Q-15. Refer to Conroy Hearing Testimony.

a. Provide a list of mechanisms the 9.90 percent ROE may apply to.

b. Confirm that application would not be automatic. If not confirmed, provide the basis for the authority to automatically apply the 9.90 percent ROE.

A-15.

a. The 9.90% ROE would apply to the following mechanisms: Retired Asset Recovery Adjustment Clause (RAR), Environmental Cost Recovery Surcharge Adjustment Clause (ECR), and Generation Cost Recovery Adjustment Clause (GCR).

b. If the Commission approves a 9.90% ROE for base rates in this proceeding, it would automatically apply to all of the mechanisms listed above except ECR. Each such mechanism already includes (RAR) or is proposed to include (GCR) a provision that automatically applies the most recently approved base rate ROE to the mechanism.

For ECR, the Company has asked the Commission to approve applying the base rate ROE approved in this case to the ECR mechanism, which the amended Stipulation supports as part of the relief the Company requested in this case. Therefore, if the Commission approves the Stipulation, the Company would apply the 9.90% ROE to the ECR mechanism.

KENTUCKY UTILITIES COMPANY

Response to Commission Staff's Post-Hearing Request for Information
Dated November 12, 2025

Case No. 2025-00113

Question No. 16

Responding Witness: Michael E. Hornung

Q-16. Refer to Conroy Hearing Testimony. Presuming that the stipulation is approved except for the provision that the Rate EHLF tariff would only be applied to new customers, provide how many current customers would fall under the stipulated EHLF tariff.

A-16. The Company does not have any current customers that would be eligible for service under EHLF. There is only one customer that meets the availability terms of EHLF, but the Company serves that customer under a Commission-approved special contract.

KENTUCKY UTILITIES COMPANY

Response to Commission Staff's Post-Hearing Request for Information
Dated November 12, 2025

Case No. 2025-00113

Question No. 17

Responding Witness: Michael E. Hornung

Q-17. Refer to Conroy Hearing Testimony. Provide the workpapers for how the Maximum Load Charge per kVA was calculated for the EHLF tariff. Provide the exhibit in Excel spreadsheet format with all formulas, rows, and columns unprotected and fully accessible.

A-17. See the attachment to the response to PSC 1-54, 2025 PSC DR1 KU Attach to Q54 - Sch M CONFIDENTIAL, Tab Sch M-2.3(2), Row 454 for Tariff RTS and Row 542 for Tariff EHLF. The Basic Service Charge and Energy Charge for EHLF are the same rates proposed for RTS. The EHLF Maximum Load Charge is the sum of the proposed RTS Demand kVA Charges (Base, Intermediate, and Peak).

KENTUCKY UTILITIES COMPANY

Response to Commission Staff's Post-Hearing Request for Information
Dated November 12, 2025

Case No. 2025-00113

Question No. 18

Responding Witness: Dylan W. D'Ascendis

Q-18. Refer to the Hearing Testimony of Dylan W. D'Ascendis (D'Ascendis Hearing Testimony). Specify the operating data selection criteria used to justify the exclusion of NorthWestern Corp. from the Electric Utility Proxy Group and explain how NorthWestern Corp.'s percentage of operating income and assets from regulated electric operations did not meet the screening criteria. In the response, include how NorthWestern Corporation's percentage of operating income and assets from regulated electric operations changed from the time original testimony was filed to the time the update to the analyses took place.

A-18. The screening criteria data on which Mr. D'Ascendis relied to determine his proxy groups (including data for NorthWestern Corp.) is in the attachment being provided in a separate file. Table 1, below, presents the operating income and assets data for NorthWestern Corp. as of the analytical periods presented in Mr. D'Ascendis' Direct and Rebuttal Testimonies.

Table 1: Operating Income and Asset Data for NorthWestern Corp. as of Mr. D'Ascendis' Direct and Rebuttal Testimonies

Date	Regulated Electric Operating Income	Total Net Operating Income	% Net Operating Income Attributable to Electric Operations	Regulated Electric Assets	Total Assets	% Assets Attributable to Electric Operations
9/2/2025	281,711	351,101	80.2%	6,034,159	8,778,105	68.74%
2/28/2025	247,973	292,916	84.7%	6,071,021	7,600,652	79.88%

Since NorthWestern Corp.'s assets attributable to regulated electric operations were less than 70% in fiscal year 2024, it was eliminated from Mr. D'Ascendis' updated Electric Utility Proxy Group.

KENTUCKY UTILITIES COMPANY

Response to Commission Staff's Post-Hearing Request for Information
Dated November 12, 2025

Case No. 2025-00113

Question No. 19

Responding Witness: Christopher M. Garrett

Q-19. Refer to the Hearing Testimony of Christopher M. Garrett (Garrett Hearing Testimony). Explain how the following allocation factors impacted KU and how these have been applied:

a. Rate Base ratio;

b. Planned asset ratio;

c. Provide three examples within the last 12 months of an expense allocated to KU, the ratio(s) applied, the resulting expense allocation.

A-19. The Rate Base ratio and the Plan Asset Ratio are both allocation ratios described in the Company's Cost Allocation Manual (CAM), which was provided to the PSC on March 31, 2025 and included in Tab 51 - 807 KAR 5:001 Section 16(7)(u) of the filing requirements, and are methods which PPL affiliates follow in providing certain goods and performing certain services for affiliate companies and in receiving charges for goods and services from affiliated companies and then allocating those charges to affiliates.

a. The Rate Base ratio is based upon applicable rate base per entity at year-end for the preceding year. In the last 12 months the use of this ratio has been limited to two projects, both of which have been charged below-the-line to the Company.

b. The Plan Asset ratio is based upon the split of plan assets in the pension.

c. The Company is providing three examples of expenses within the last twelve months allocated to KU and the resulting expense allocation.

Example 1:

LG&E and KU Services Company (LKS) received invoice 6150 from Strategic Advisors. The invoice is provided in Attachment 1 to this response. The CAM indicates that government relations and lobbying services should be allocated using the Rate Base ratio. The Rate Base ratio, which is calculated based on rate base per entity, allocates 56% KU.

Attachment 2 to this response shows the allocation of $140 of the total invoice $250 to KU.

Example 2:

PPL Services (PPLS) incurred employee expenses for office supplies for an employee working in the pension area and for a business trip for that employee to attend the Employee Benefit Plan Board (EBPB) meeting. The receipts are provided in Attachments 3 and 4 to this response. The CAM indicates that services for company pension and other benefit plans should be allocated using the Plan Assets ratio.

The Plan Asset ratio allocated 33.59% of the receipts total of $2,385.55 to LKS from PPLS. See the first tab of Attachment 5 to this response showing the allocation of $801.31 from PPLS to LKS.

The Plan Asset ratio allocated 49% from LKS to KU.

See the second tab of Attachment 5 to this response showing the LKS allocation of 49% to KU. KU received $392.64.

Example 3:

PPL Services (PPLS) incurred an expense for an online subscription used to complete benefit plan Form 5500 filings from FIS Relius and booked an accounting correction for $3. The receipt is provided in Attachment 6 to this response. The correcting journal entry is provided in Attachment 7 to this response. The CAM indicates that services for company pension and other benefit plans should be allocated using the Plan Assets ratio.

The Plan Asset ratio allocated 33.59% of the receipt and journal entry total of $998.24 ($995.24+$3) to LKS from PPLS. See the first tab of Attachment 8 to this response showing the allocation from PPLS to LKS.

The Plan Asset ratio allocated 49% from LKS to KU.

See the second tab of Attachment 8 to this response showing the LKS allocation of 49% to KU. KU received $164.30.

KENTUCKY UTILITIES COMPANY

Response to Commission Staff's Post-Hearing Request for Information
Dated November 12, 2025

Case No. 2025-00113

Question No. 20

Responding Witness: Lonnie E. Bellar

Q-20. Refer to the Hearing Testimony of Lonnie E. Bellar (Bellar Hearing Testimony). Provide the business plan for Mill Creek Unit 2 pertaining to the estimated timing and amounts of both capital investments and operating and maintenance (O&M) expense.

a. Refer to Bellar Hearing Testimony. Provide what the O&M and rate base adjustments would be for the test period to include the stay open costs of Mill Creek Unit 2. Provide this information in Excel spreadsheet format with all formulas, rows, and columns unprotected and fully accessible.

b. Refer to Bellar Hearing Testimony. Provide an update to and breakdown of the amount of investment for Mill Creek 2 stay open costs. Provide this information in Excel spreadsheet format with all formulas, rows, and columns unprotected and fully accessible.

A-20. Not applicable. The Mill Creek 2 adjustment clause is only applicable to LG&E given its 100% ownership share.

KENTUCKY UTILITIES COMPANY

Response to Commission Staff's Post-Hearing Request for Information
Dated November 12, 2025

Case No. 2025-00113

Question No. 21

Responding Witness: Lonnie E. Bellar / Christopher M. Garrett

Q-21. Refer to KU's supplemental filing on October 31, 2025, Exhibit 5.

a. In the MC2 LGE Tab Row 11 O&M, explain the negative values beginning in October 2027 and continuing in each subsequent October. Include in the response any workpapers in Excel spreadsheet format with all formulas, rows, and columns unprotected and fully accessible.

b. Explain the large increases in O&M beginning in November 2027 and continuing in each subsequent November. Include in the response any workpapers in Excel spreadsheet format with all formulas, rows, and columns unprotected and fully accessible.

A-21. Not applicable. The Mill Creek 2 adjustment clause is only applicable to LG&E given its 100% ownership share.

KENTUCKY UTILITIES COMPANY

Response to Commission Staff's Post-Hearing Request for Information
Dated November 12, 2025

Case No. 2025-00113

Question No. 22

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

Q-22. For purposes of this request, assume that a final Order in this case was issued on December 31, 2025. For the Renewable Purchase Power Adjustment Clause, the Generation Cost Recovery Adjustment Clause, and the Mill Creek Unit 2 Adjustment Clause, provide the following for the period of January 2026 through January 2028:

a. A timeline for filings with the Commission including but not limited to monthly updates or forms for review;

b. A list of what would be included in each filing;

c. The timeline for the review process and expected Order issuances, if applicable;

d. A list of any filings as a result of these mechanisms that do not occur on a specific timeline; and

e. Any proposed end dates for the mechanisms or a statement that the mechanisms are ongoing indefinitely.

A-22. The Mill Creek Unit 2 Adjustment Clause is not applicable to KU.

a. The Companies proposed filing the Renewable Purchase Power Adjustment Clause and the Generation Cost Recovery Adjustment Clause monthly reporting forms 10 days prior to the effective date of the applicable billing factors, which is consistent with the filing of the Environmental Cost Recovery Surcharge ("ECR"), Fuel Adjustment Clause ("FAC"), and Off-System Sales Adjustment Clause ("OSS") (collectively, "FAC-OSS"). The effective date is the first day of the first meter read window for the billing period, and the billing period is the second month after the costs are incurred. Below are the monthly filing dates through November 2026. The meter read dates beyond this are still being finalized. Of note, neither of these adjustment clauses is expected to incur recoverable costs in 2026. The filing schedule below assumes the adjustment clauses will be approved effective as of January 1, 2026, not as of the assumed December 31, 2025 final order date.

Expense Month	Filing Date with the Kentucky Public Service Commission
January 2026	Friday, February 20, 2026
February 2026	Friday, March 20, 2026
March 2026	Monday, April 20, 2026
April 2026	Tuesday, May 19, 2026
May 2026	Thursday, June 18, 2026
June 2026	Tuesday, July 21, 2026
July 2026	Friday, August 21, 2026
August 2026	Friday, September 18, 2026
September 2026	Monday, October 19, 2026
October 2026	Friday, November 20, 2026

b. See Joint Stipulation Testimony Exhibit 1 at pages 12-13. Additionally, the Companies provided monthly reporting form templates to the Commission to demonstrate the information necessary to support the determination of revenue requirements and billing factors for each adjustment clause. The Renewable Purchase Power Adjustment Clause monthly reporting form template was provided as Direct Testimony Exhibit AMF-1 with an illustrative populated version provided as Direct Testimony Exhibit AMF-3. See also the Direct Testimony of Andrea M. Fackler at pages 36-39. The Generation Cost Recovery Adjustment Clause monthly reporting form template was provided as Joint Supplemental Testimony Exhibit 2. The latter form template was designed using the Environmental Cost Recovery Surcharge Adjustment Clause monthly reporting form template since the types of costs to recover (e.g., capital, O&M, depreciation, and property taxes) are similar to those proposed for recovery through the Generation Cost Recovery Adjustment Clause. The reporting form templates are what the Companies believe are appropriate, but the Companies welcome direction from the Commission to ensure these form templates provide all the information the Commission needs concerning each proposed mechanism.

c. The monthly filings can be reviewed at any time by the Commission. If an error were to be discovered by the Commission or the Companies after filing, the Companies would account for the correction as a prior period adjustment in the next applicable monthly filing if the billing factors had already commenced being billed to customers. If they have not commenced being billed, the Companies would update the billing factors so that customers are billed the corrected billing factors. Similar to the ECR and FAC-OSS, the Companies do not expect the Commission will issue an order approving each monthly filing.

The Stipulation also recommends annual review proceedings for the Commission to review costs recovered under the Generation Cost Recovery Adjustment Clause. The Companies anticipate the review process would be similar to the ECR and FAC review processes, in which the Commission initiates proceedings to review the costs recovered through the mechanism. While the Stipulation suggests annual reviews, the Companies welcome more or less frequent review proceedings at the Commission's discretion. The Companies do expect the Commission will issue an order at the conclusion of the review proceeding regarding the prudency of the costs incurred by the Companies and the application of the mechanism in accordance with the tariff similar to the orders issued in ECR and FAC review proceedings.

d. The Companies do not expect to make any filings outside of the timing noted in part a. Corrected filings will be included in the monthly filing as a supplement and disclosed in the filing letter.

e. The Renewable Purchase Power Adjustment Clause and the Generation Cost Recovery Adjustment Clause would continue in perpetuity.

KENTUCKY UTILITIES COMPANY

Response to Commission Staff's Post-Hearing Request for Information
Dated November 12, 2025

Case No. 2025-00113

Question No. 23

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

Q-23. For purposes of this request, assume that a final Order in this case was issued on December 31, 2025. For the Sharing Mechanism Adjustment Clause, provide the following through the date it ceases to be in effect:

a. A timeline for filings with the Commission including but not limited to monthly updates or forms for review;

b. A list of what would be included in each filing;

c. The timeline for the review process and expected Order issuances, if applicable;

d. A list of any filings as a result of these mechanisms that do not occur on a specific timeline; and

e. Proposed end date for the mechanism, if any.

A-23.

a. After the Reporting Period,[6] the Companies will make a filing with the Commission by October 1, 2028, showing the Companies' calculations of their actual adjusted earned returns, the adjusted returns for the top and bottom end of the ROE deadband of 9.40% and 10.15%, and the resulting revenue deficiency or surplus (if any). If there is a revenue deficiency or surplus, the amount will be collected from or distributed to customers during the November 2028 through November 2029 billing cycles ("Adjustment Period"). After the Adjustment Period, the Companies will make a one-time true-up filing on February 1, 2030, to account for any over- or under-collection from or distribution to customers during the Adjustment Period. This over- or under- amount will be collected from or distributed to customers during the March 2030 billing cycle.

[6] The Reporting Period for the time-limited Sharing Mechanism ("Adjustment Clause SM") is July 2027 through July 2028.

b. See Joint Stipulation Testimony Exhibit 1 at pages 13-18. Additionally, the filing made with the Commission by October 1, 2028, will include the following calculations: (1) the actual adjusted jurisdictional net operating income and earned return on common equity for each utility for the Reporting Period; (2) the adjusted jurisdictional net operating income necessary to achieve the return on common equity at the top and bottom of the return in equity deadband; and (3) the amount, if any, by which the actual adjusted net operating income exceeds the adjusted net operating income for the top end of the return on equity deadband ("surplus") or falls short of the adjusted net operating income for the bottom end of the return on equity deadband ("deficiency"). The Adjustment Clause SM reporting form templates were provided as Joint Supplemental Testimony Exhibit 3. See also the discussion in Joint Supplemental Testimony of Robert M. Conroy and Christopher M. Garrett at pages 9-12. The forms were designed in part using the base rate case filing requirement Schedules A, C, H, and J[7] since the underlying calculations for Adjustment Clause SM will primarily mimic these schedules filed in the application in this proceeding. The Companies believe the reporting forms are appropriate, but the Companies welcome direction from the Commission to ensure the form templates provide all the information the Commission needs concerning the proposed mechanism.

c. The Stipulation stated that the Commission has full authority to review the filing and conduct an appropriate review proceeding.[8] If the Commission deemed a review proceeding necessary, the Companies anticipate the Commission would open a review proceeding shortly after the Companies made their filings with the Commission by October 1, 2028. The Companies would anticipate the Commission would issue its final order in each review proceeding within six months of initiating the proceeding, making all necessary prudency findings, findings concerning the accuracy of the Companies' calculations, and setting forth any adjustments the Companies might need to make concerning future billing cycles affected by the Sharing Mechanisms.

During the pendency of the review proceedings, the Companies' Sharing Mechanisms would function in accordance with the Companies' filings, i.e., beginning with the November 2028 billing cycle, each Sharing Mechanism would either collect funds, return funds, or have no effect according to the

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[7] Filing requirement 807 KAR 5:001 Section 16(8) (a) (Schedule A), 807 KAR 5:001 Section 16(8) (c) (Schedule C), 807 KAR 5:001 Section 16(8) (h) (Schedule H), and 807 KAR 5:001 Section 16(8) (j) (Schedule J).

[8] The Commission did open annual review proceedings for the Companies' prior Earnings Sharing Mechanisms. *See, e.g., The Annual Earnings Sharing Mechanism Filing of Louisville Gas and Electric Company*, Case No. 2001-00054, Order (Ky. PSC May 29, 2001); Case No. 2001-00054, Order (Ky. PSC Dec. 3, 2001); *The Annual Earnings Sharing Mechanism Filing of Kentucky Utilities Company*, Case No. 2001-00055, Order (Ky. PSC May 29, 2001); Case No. 2001-00055, Order (Ky. PSC Dec. 3, 2001).

Companies' calculations, and it would continue to do so during the pendency of the review proceeding.

After the Commission's final order in each proceeding, the Companies would make any adjustments necessary to the remaining billings affected by the Sharing Mechanisms to reflect the impact of the Commission's orders. Thus, if the Commission opened review proceedings on November 1, 2028, and issued its final orders by April 30, 2029, the Companies would anticipate making any necessary adjustments to their Sharing Mechanisms during the remaining billing cycles of the Adjustment Period (i.e., through and including November 2029).

This approach—having the Sharing Mechanism function while the review proceeding is pending, with any changes the Commission requires to be implemented for the balance of the Adjustment Period—is consistent with the operation of the Companies' prior Earnings Sharing Mechanisms.[9]

Any final true-up would occur in the March 2030 billing cycle, for which the Companies would make their true-up filings by February 1, 2030. Because the true-up would be a pure math exercise—what final collection or return of funds is needed to true-up the prior collection or return of funds (if any)—the Companies do not foresee the need for true-up review proceedings; rather, the Companies assume the Staff would review the filings for mathematical accuracy.

d. The Companies do not expect to make any filings outside of the timing noted in part a. If a correction is identified after the Adjustment Clause SM billing factors take effect for the Adjustment Period, the impact of the correction can be included in the true-up filing and addressed in the filing letter.

e. Adjustment Clause SM will cease to be in effect after the completion of the Companies' March 2030 billing cycle, and the Companies will withdraw the Adjustment Clause SM tariff sheets from their tariffs.

[9] *See, e.g., Louisville Gas and Electric Company's Annual Earnings Sharing Mechanism Filing for Calendar Year 2001*, Case No. 2002-00071, Order (Ky. PSC Feb. 28, 2003); *Kentucky Utilities Company's Annual Earnings Sharing Mechanism Filing for Calendar Year 2001*, Case No. 2002-00072, Order (Ky. PSC Feb. 28, 2003).

KENTUCKY UTILITIES COMPANY

Response to Commission Staff's Post-Hearing Request for Information
Dated November 12, 2025

Case No. 2025-00113

Question No. 24

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

Q-24. Refer to Bellar Hearing Testimony and KU's supplemental filing on October 31, 2025, Exhibit 5, Tab Estimated Bill Impact. Provide the bill impact if the Mill Creek Unit 2 recovery mechanism was combined with the GCR mechanism in the same format as originally filed. Include in the response the workpapers for the exhibit in Excel format with all cells unlocked and formulas intact.

A-24. The Mill Creek Unit 2 recovery mechanism is not applicable to KU. Therefore, the bill impact provided for GCR as Supplemental Testimony Exhibit 1 reflects the Company's best estimate at this time. See also the response to Question No. 4.

KENTUCKY UTILITIES COMPANY

Response to Commission Staff's Post-Hearing Request for Information
Dated November 12, 2025

Case No. 2025-00113

Question No. 25

Responding Witness: Shannon L. Montgomery

Q-25. Refer to Bellar Hearing Testimony. Provide a reference for each of the studies or reports referenced regarding the impacts of advanced metering infrastructure (AMI) on health. If the document is not publicly available, provide a copy of the information.

A-25. See attachment being provided in a separate file.

KENTUCKY UTILITIES COMPANY

Response to Commission Staff's Post-Hearing Request for Information Dated November 12, 2025

Case No. 2025-00113

Question No. 26

Responding Witness: Vincent Poplaski

Q-26. Refer to the Rebuttal Testimony of Vincent Poplaski, pages 4-5. The testimony explains that the issuance of Restricted Stock Units (RSUs) as a form of incentive compensation is a "time-based measure" rather than a financial measure.

a. Explain why RSUs are considered a time-based measure and not a financial measure, given that the RSU is tied to the stock price of KU's parent company.

b. Explain under what conditions an employee at KU would be awarded an RSU.

A-26.

a. RSUs are a time-based measure because they are designed to promote long-term employee retention and vest *solely* based on continued employee service. RSU awards are necessary to meet labor market expectations for certain roles and follow a three-year vesting schedule wherein employees must continue employment during that period until the restrictions lapse. The RSUs are then distributed to employees in the form of shares of PPL Corporation common stock, and employees will vest in the RSUs (as long as they remained employed at PPL) regardless of how PPL's stock price performed over the vesting period. RSUs are not linked to operational or financial performance and vesting does not depend on the attainment of any financial metrics, a specific PPL stock price, or any other performance goals related to individual or company. RSUs are granted to ensure PPL can attract talent (by meeting labor market expectations) and retain talent (via the multi-year vesting period) necessary for success. RSUs are the only component of PPL's total rewards program that promotes long-term employee retention.

b. Employees are eligible to receive RSUs based on their job level. For example, based on prevailing market practices, roles at and above the director level typically receive RSUs annually. Employees in manager level roles and a limited number of high-level individual contributor roles are in an eligibility pool and may be selected to receive an RSU grant based on performance and contributions.

KENTUCKY UTILITIES COMPANY

Response to Commission Staff's Post-Hearing Request for Information Dated November 12, 2025

Case No. 2025-00113

Question No. 27

Responding Witness: Daniel Johnson

Q-27. Refer to the Direct Testimony of Daniel Johnson, pages 16-23.

a. Explain how KU currently utilizes Artificial Intelligence (AI).

b. Provide any current policies related to AI.

c. Explain how PPL's plan to upgrade IT systems includes AI integration, beyond the creation of a data and AI team.

d. Explain whether KU believes that the implementation of AI will reduce future O&M expenses and, if so, how future O&M costs will be reduced.

A-27.

a. Kentucky Utilities (KU) employs advanced Artificial Intelligence (AI) technologies across multiple operational domains to improve efficiency, reliability, and customer experience. These enterprise-grade AI systems support critical functions such as:

- Employee Development: Adaptive learning platforms utilize AI to deliver personalized training programs, enhancing workforce skills and compliance readiness.

- Operational Safety: Predictive analytics powered by AI assess large datasets to identify and mitigate potential hazards, reinforcing KU's commitment to a safe operating environment.

- Infrastructure Management: AI tools monitor non-Operational Technology (non-OT) systems to enable proactive maintenance and reduce service disruptions.

- Accessibility and Administrative Efficiency: AI solutions streamline administrative processes and ensure equitable access to information and services for all customers.

- Cybersecurity: AI-driven monitoring and threat detection safeguard sensitive data and infrastructure against evolving cyber risks.

In addition to these established applications, KU is advancing its use of AI agents to strengthen customer service and operational responsiveness:

- Customer Service Agents: Intelligent virtual agents provide immediate assistance for routine inquiries, guide customers through self-service options, and escalate complex issues with full context to human representatives, reducing resolution times.

- Agent Assistance: AI-powered tools support customer service representatives by delivering real-time recommendations, summarizing account histories, and suggesting next-best actions, thereby improving accuracy and efficiency.

b. See attachment being provided in a separate file.

c. PPL's comprehensive IT modernization plan emphasizes Artificial Intelligence (AI) integration as a core component of operational improvement, extending well beyond the establishment of a dedicated data and AI team. The strategy includes deployment of Agentic AI capabilities, which enable autonomous decision-making and dynamic orchestration of complex workflows. These agent-based systems will proactively manage tasks, optimize resource allocation, and adapt to changing operational conditions with minimal human intervention, thereby improving reliability and efficiency.

   In addition to Agentic AI, the plan incorporates:

   - Cybersecurity Enhancements: AI-driven threat detection and response mechanisms to safeguard critical systems and customer data.

   - Adaptive Learning Platforms: AI-enabled training programs tailored to individual employee needs, supporting workforce development and compliance.

   - Predictive Analytics for Safety: Advanced modeling to anticipate and mitigate operational risks, reinforcing PPL's commitment to safety.

   - Proactive Infrastructure Maintenance: AI monitoring of non-Operational Technology (non-OT) systems to prevent service disruptions.

- Accessibility and Administrative Efficiency: AI tools to streamline administrative processes and ensure equitable access to services.

Furthermore, PPL is advancing the use of AI-powered customer service agents and agent-assist tools to improve customer experience. These systems will provide immediate responses to routine inquiries, assist human representatives with real-time recommendations, and enable faster resolution of complex issues. By integrating these capabilities, PPL aims to deliver a more responsive, secure, and efficient service environment.

This holistic approach demonstrates PPL's commitment to leveraging advanced AI—including Agentic AI—to support modernization objectives, enhance operational resilience, and improve customer satisfaction in alignment with regulatory and business priorities.

d. KU believes that the implementation of Artificial Intelligence (AI) will contribute to reductions in future Operations and Maintenance (O&M) expenses through multiple efficiency gains:

- Proactive Maintenance and Asset Management

  AI-driven predictive analytics will identify potential equipment failures and system anomalies early, reducing unplanned outages and emergency repair costs.

- Workforce Efficiency and Internal Productivity

  AI-enabled tools will automate repetitive administrative tasks such as data entry, report generation, and scheduling. This automation will reduce manual effort, free employee time for higher-value activities, and lower labor hours associated with routine processes.

- Agent Assistance for Customer Service and Field Operations

  AI-powered assistants will provide real-time recommendations, summarize account histories, and suggest next-best actions for service representatives and field technicians. This will improve first-contact resolution rates and reduce time spent on problem-solving.

- Optimized Resource Allocation

  Agentic AI systems will dynamically orchestrate workflows and prioritize tasks based on operational conditions, minimizing redundant activities and improving utilization of resources.

- Reduced Training and Compliance Costs

Adaptive learning platforms will deliver personalized training, reducing time and expense associated with traditional instruction and improving compliance efficiency.

- Cybersecurity and Risk Mitigation

  AI-based threat detection will reduce the likelihood of costly security incidents, lowering potential remediation and recovery expenses.

By automating manual processes, improving internal productivity, and enabling predictive maintenance, KU expects AI integration to reduce future O&M costs while enhancing reliability and customer service.

KENTUCKY UTILITIES COMPANY

Response to Commission Staff's Post-Hearing Request for Information
Dated November 12, 2025

Case No. 2025-00113

Question No. 28

Responding Witness: Daniel Johnson

Q-28. Refer to KU's response to Commission Staff's Second Request for Information (Staff's Second Request) Request, Item 60, Attachment, page 8 of 19. Of those efficiencies noted, how many of the employee reductions will be in the Commonwealth of Kentucky.

A-28. With the IT restructuring that occurred earlier this year, there were 66 Kentucky based employees who had their positions eliminated. Of those 66, 22 of them accepted positions with Accenture, our Managed Services Provider.

KENTUCKY UTILITIES COMPANY

Response to Commission Staff's Post-Hearing Request for Information Dated November 12, 2025

Case No. 2025-00113

Question No. 29

Responding Witness: Robert M. Conroy

Q-29. Refer to the testimony provided generally. Provide the titles, roles and respective corporation or entities for each witness who provided testimony or responded to data requests in this case and reconcile any discrepancies between the affidavits, testimony, and supporting documentation. For example, in Chistopher Garrett's Direct Testimony, page 1 and his Rebuttal Testimony, page 1 it lists his role as Vice President - Financial Strategy and Chief Risk Officer for PPL Services Corporation, but does not list that he is Vice President of Finance and Accounting for Kentucky Utilities Company and Louisville Gas and Electric Company as it states in the affidavit and the statement of education and work experience.

A-29.

- Lonnie E. Bellar, Executive Vice President - Engineering, Construction and Generation for PPL Services Corporation
    - No discrepancies
- John Bevington, Senior Director – Business and Economic Development for PPL Services Corporation
    - No discrepancies
- Julissa Burgos, Assistant Treasurer, PPL Services Corporation
    - Omitted "Services" from PPL Services Corporation in data request response verification pages. The omission was an oversight, not intentional.
- Chad E. Clements, Director – Regulated Utility Tax for PPL Services Corporation
    - No discrepancies
- Robert M. Conroy, Vice President - State Regulation and Rates for Kentucky Utilities Company and Louisville Gas and Electric Company and an employee of LG&E and KU Services Company

  - In certain places it was unwieldy to list all this information, but there are no substantive inconsistencies.

- John R. Crockett III, President for Kentucky Utilities Company and Louisville Gas and Electric Company, and Senior Vice President and Chief Development Officer, PPL Services Corporation

  - In certain places it was unwieldy to list all this information, but there are no substantive inconsistencies.

- Dylan W. D'Ascendis, Partner, ScottMadden, Inc.

  - No discrepancies

- Andrea M. Fackler, CPA, CGMA, Manager of Revenue Requirement/Cost of Service for Kentucky Utilities Company and Louisville Gas and Electric Company and an employee of LG&E and KU Services Company

  - In certain places it was unwieldy to list all this information, but there are no substantive inconsistencies.

- Christopher M. Garrett, Vice President – Financial Strategy and Chief Risk Officer, PPL Services Corporation and Vice President – Finance and Accounting for Kentucky Utilities Company and Louisville Gas and Electric Company

  - In certain places it was unwieldy to list all this information, but there are no substantive inconsistencies.

- Michael E. Hornung, Manager of Pricing/Tariffs for Kentucky Utilities Company and Louisville Gas and Electric Company and an employee of LG&E and KU Services Company

  - In certain places it was unwieldy to list all this information, but there are no substantive inconsistencies.

- Daniel J. Johnson, Senior Vice President, Chief Information Officer for PPL Services Corporation

  - No discrepancies

- Timothy S. Lyons, Partner, ScottMadden, Inc.

  - No discrepancies

- Drew T. McCombs, Director of Regulatory Accounting for PPL Services Corporation

  - No discrepancies

- Elizabeth J. "Beth" McFarland, Vice President - Transmission for Kentucky Utilities Company and Louisville Gas and Electric Company and an employee of LG&E and KU Services Company

  - In certain places it was unwieldy to list all this information, but there are no substantive inconsistencies.

- Heather D. Metts, CPA, CGMA, Director of Financial Planning and Budgeting for Kentucky Utilities Company and Louisville Gas and Electric Company and an employee of LG&E and KU Services Company

  - In certain places it was unwieldy to list all this information, but there are no substantive inconsistencies.

- Shannon L. Montgomery, Vice President - Customer Service for Kentucky Utilities Company and Louisville Gas and Electric Company and an employee of LG&E and KU Services Company

  - In certain places it was unwieldy to list all this information, but there are no substantive inconsistencies.

- Vincent T. Poplaski, Vice President, Total Rewards for PPL Services Corporation

  - No discrepancies

- Tom C. Rieth, Vice President - Gas Operations for Louisville Gas and Electric Company and Vice President for Kentucky Utilities Company and an employee of LG&E and KU Services Company

  - "Gas Operations" should not have appeared in Mr. Reith's Kentucky Utilities Company title in direct testimony, rebuttal testimony, and data request response verification pages. The inclusion was an oversight, not intentional.

- Charles R. Schram, Vice President - Energy Supply and Analysis for Kentucky Utilities Company and Louisville Gas and Electric Company and an employee of LG&E and KU Services Company

  - In certain places it was unwieldy to list all this information, but there are no substantive inconsistencies.

- John J. Spanos, President, Gannett Fleming Valuation and Rate Consultants LLC

  - Application incorrectly states "Gannett Fleming, Inc." The error was unintentional.

- Peter W. Waldrab, PE, Vice President - Electric Distribution for Louisville Gas and Electric Company and Kentucky Utilities Company and an employee of LG&E and KU Services Company

  - In certain places it was unwieldy to list all this information, but there are no substantive inconsistencies.

KENTUCKY UTILITIES COMPANY

Response to Commission Staff's Post-Hearing Request for Information
Dated November 12, 2025

Case No. 2025-00113

Question No. 30

Responding Witness: Vincent Poplaski

Q-30. Refer to KU's response to Commission Staff's First Request for Information (Staff's First Request), Item 41. Provide attachments in Excel spreadsheet format with all formulas, rows, and columns unprotected and fully accessible.

A-30. See attachments being provided in separate files. Only Attachments 1, 2, 3, 7, and 8 to the response to PSC 1-41 were in Excel format. Certain information requested is confidential and proprietary and is being provided under seal pursuant to a petition for confidential protection.

KENTUCKY UTILITIES COMPANY

Response to Commission Staff's Post-Hearing Request for Information
Dated November 12, 2025

Case No. 2025-00113

Question No. 31

Responding Witness: Vincent Poplaski

Q-31. Refer to the Hearing Testimony of John R. Crockett.

a. Provide all salary, wage and compensation information related to executive employees by name and title, in full, for affiliates, parents, and subsidiaries for the employees listed in KU's response to Staff's First Request, Item 41, for the years 2020 through present day 2025. This response should be reconciled with the response to Item 31 as well. Provide all information in excel spreadsheet format with all formulas, rows, and columns unprotected and fully accessible.

b. Provide the individual affiliates, parents, and subsidiaries amounts for each employee for each of those years allocated, by entity of allocation.

c. Provide the number of employees solely employed by KU, if any.

A-31.

a. See the response to Question No. 52.

b. See the response to Question No. 52, Tab Titled "Allocation from REG Accounting".

c. None of the executive employees listed in KU's response to PSC 1-41 is a KU employee. Rather, they are LG&E and KU Services Company employees. For a complete listing of KU headcount by department, see the attachment to the response to AG-KIUC 1-67.

KENTUCKY UTILITIES COMPANY

Response to Commission Staff's Post-Hearing Request for Information
Dated November 12, 2025

Case No. 2025-00113

Question No. 32

Responding Witness: John Bevington

Q-32. Refer to the Hearing Testimony of John Bevington (Bevington Hearing Testimony). Explain how many projects in the economic pipeline would qualify for service pursuant to the EHLF tariff with the shift from 100 MVA to 50 MVA.

A-32. Based on the file provided in response to Question No. 33, shifting the minimum capacity requirement from 100MVA to 50MVA adds four projects that would qualify for the EHLF tariff.

KENTUCKY UTILITIES COMPANY

Response to Commission Staff's Post-Hearing Request for Information
Dated November 12, 2025

Case No. 2025-00113

Question No. 33

Responding Witness: John Bevington

Q-33. Refer to Bevington Hearing Testimony. Provide an updated project tracking document for the economic development pipeline, including the total expected MW for each project.

A-33. See the updated attachment to PSC 2-32 being provided in a separate file, which provides information on the active projects in the Companies' economic development pipeline, as of November 12, 2025. Certain information requested is confidential and proprietary and is being provided under seal pursuant to a petition for confidential protection.

KENTUCKY UTILITIES COMPANY

Response to Commission Staff's Post-Hearing Request for Information
Dated November 12, 2025

Case No. 2025-00113

Question No. 34

Responding Witness: Shannon L. Montgomery

Q-34. Provide a copy of the most recent Fiserve agreement.

A-34. See attachment being provided in a separate file. 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 Commission Staff's Post-Hearing Request for Information
Dated November 12, 2025

Case No. 2025-00113

Question No. 35

Responding Witness: Shannon L. Montgomery

Q-35. Provide any updates, if available, to the Pre-Pay tariff development. Include any sample bills or bill summaries.

A-35. The Companies do not have any material updates to report, including sample bills or bill summaries.

KENTUCKY UTILITIES COMPANY

Response to Commission Staff's Post-Hearing Request for Information
Dated November 12, 2025

Case No. 2025-00113

Question No. 36

Responding Witness: Andrea M. Fackler / Daniel Johnson / Heather D. Metts

Q-36. Refer to the response to Staff's Second Request, Item 66. Confirm that the expenses related to the five year IT business plan are included in the base rate calculation in this proceeding. If not confirmed, specifically identify the amount of IT upgrades included in the base period and the forecast period, respectively.

A-36. Confirmed. As indicated in the response to PSC 2-66, the costs for the IT upgrades are in the five-year IT business plan. Therefore, the Company included the 2026 level of such costs in this proceeding.

KENTUCKY UTILITIES COMPANY

Response to Commission Staff's Post-Hearing Request for Information
Dated November 12, 2025

Case No. 2025-00113

Question No. 37

Responding Witness: Peter W. Waldrab

Q-37. Refer to the Hearing Testimony of Peter Waldrab (Waldrab Hearing Testimony). For each regulatory asset recorded based on storm damages over the past five years provide the following:

a. The Tmed threshold for the year of the storm;

b. The amount of customer minutes of interruption (CMI);

c. Whether the storm qualified as a Major Event Day under IEEE Standard 1366;

A-37.

a. See attachment being provided in a separate file.

b. See attachment referenced in response to part (a). The Companies follow IEEE Standard 1366 for Major Event Days by accruing all CMI impacts of an outage event to the calendar day on which the interruption began. In storms requiring multi-day restoration efforts, CMI impacts often span multiple days accordingly.

c. See attachment referenced in response to part (a).

KENTUCKY UTILITIES COMPANY

Response to Commission Staff's Post-Hearing Request for Information
Dated November 12, 2025

Case No. 2025-00113

Question No. 38

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

Q-38. Refer to Waldrab Hearing Testimony. Provide a breakdown of the types of solar panels (i.e. fixed tilt, single-access tracking) for NM-2 customers.

A-38. The Company does not keep records on the type of solar panels (fixed/tracking) installed by customers. This information is not requested in the application process. However, as the majority of NMS-2 applications are roof mounted, it can be assumed that the majority of the panels would be fixed tilt.

KENTUCKY UTILITIES COMPANY

Response to Commission Staff's Post-Hearing Request for Information Dated November 12, 2025

Case No. 2025-00113

Question No. 39

Responding Witness: Charles R. Schram

Q-39. Refer to Waldrab Hearing Testimony. Provide the system daily peak and seasonable peak for both the summer and winter.

A-39. See the table below for seasonal peaks and the attachment being provided in Excel format for the daily peaks since 2020 and including the forecasted test year.[10]

Year	Summer Peak, Total System (MW)	Summer Peak, KU System (MW)	Summer Peak, LG&E System (MW)	Winter Peak, Total System (MW)	Winter Peak, KU System (MW)	Winter Peak, LG&E System (MW)
2020	6,069	3,571	2,505	5,317	3,642	1,703
2021	6,123	3,586	2,540	5,589	3,828	1,813
2022	6,187	3,655	2,572	6,407	4,433	2,048
2023	6,191	3,565	2,639	5,004	3,396	1,666
2024	6,061	3,569	2,510	6,407	4,474	1,933
2025	6,134	3,593	2,541	6,814	4,797	2,017
2026	6,242	3,682	2,560	6,150	4,306	1,858

[10] The KU system includes ODP.

KENTUCKY UTILITIES COMPANY

Response to Commission Staff's Post-Hearing Request for Information Dated November 12, 2025

Case No. 2025-00113

Question No. 40

Responding Witness: Charles R. Schram

Q-40. Refer to the Rebuttal Testimony of Charles R. Schram at 2, which referred to one Curtailable Service Rider (CSR) physical curtailment in 2025.

a. Explain the need for physical curtailment during this 2025 event.

b. Explain whether the CSR-1 and CSR-2 customers curtailed the amounts required by contract and, if not, whether there were any consequences for the customer.

c. Provide the total amount of MW curtailed by these customers during this 2025 event.

d. Refer to KU's response to Commission Staff's Fourth Request for Information, Item 14. Provide an updated avoided capacity cost analysis for qualifying facility (QF) rates utilizing the methodology approved in 2023-00404[11] and the updated assumptions listed in Item 14. Provide this information in Excel spreadsheet format with all formulas, rows, and columns unprotected and fully accessible.

A-40.

a. A substation issue at the Ghent station caused Ghent units 2 and 4 to trip on a hot summer afternoon. Physical curtailment for CSR customers was initiated to ensure the Companies could maintain their required reserves.

b. See the attachment to the response to AG-KIUC 2-52(h), which shows that two KU CSR customers were non-compliant during the 2025 event and were charged non-compliance penalties and that no LG&E CSR customers were non-compliant during this event.

c. See the response to AG-KIUC 2-52(g).

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[11] Case No. 2023-00404, *Electronic Tariff Filings of Louisville Gas and Electric Company and Kentucky Utilities Company to Revise Purchase Rates for Small Capacity and Large Capacity Cogeneration and Power Production Qualifying Facilities and Net Metering Service-2 Credit Rates* (Ky. PSC Aug. 30, 2024), Order.

d. See the response and workpapers provided as attachments to PSC 4-13(b). The tables below from Section 5 of Exhibit CRS-6 have been updated to reflect avoided capacity costs based on the cost of Brown 12 in 2030 and scaled by availability factors for QF technology options. Assumptions for capital and fixed operating costs for Brown 12 in 2030 are consistent with Case No. 2025-00045. The table below shows the availability factors by QF technology based on the availability of the resource during monthly peak hours.

Availability of QF Technologies during Peak Hours (% of Nameplate Capacity)

	Monthly Peak Hour	Solar: Single-Axis Tracking	Solar: Fixed Tilt	Wind	Other
Jan	7	0.0%	0.0%	37.0%	100.0%
Feb	8	15.2%	4.5%	38.2%	100.0%
Mar	7	10.5%	1.8%	34.0%	100.0%
Apr	14	73.7%	35.7%	34.7%	100.0%
May	15	71.6%	36.3%	23.8%	100.0%
Jun	15	76.9%	46.0%	20.1%	100.0%
Jul	15	77.9%	52.7%	14.0%	100.0%
Aug	15	72.7%	53.9%	11.8%	100.0%
Sep	16	63.5%	37.4%	15.1%	100.0%
Oct	15	55.6%	42.4%	21.9%	100.0%
Nov	7	1.1%	0.6%	46.4%	100.0%
Dec	7	0.0%	0.0%	39.6%	100.0%
Annual Average		**43.3%**	**26.1%**	**28.0%**	**100.0%**

Table 13: Qualifying Facility Avoided Capacity Rates for Transmission Connected Projects, without Line Losses ($/MWh)

	QF Avoided Capacity, 2030 Need (without line losses for transmission connected projects)		
		7-Year PPA Beginning:	
Technology	**2-Year PPA**	**2026**	**2027**
Solar: Single-Axis Tracking	0.00	13.69	18.99
Solar: Fixed Tilt	0.00	13.11	18.18
Wind	0.00	6.89	9.56
Other Technologies	0.00	7.81	10.83

Table 14: Qualifying Facility Avoided Cost Rates for Transmission Connected Projects, without Line Losses ($/MWh)

Technology	QF All-In Avoided Cost Rates (without line losses for transmission connected projects) 2-Year PPA	2026/2027 Avoided Cost Rate
Solar: Single-Axis Tracking	31.52	53.09
Solar: Fixed Tilt	31.55	52.48
Wind	30.62	43.15
Other Technologies	30.54	44.70

Table 17: Qualifying Facility Avoided Capacity Rates by Company, with Line Losses ($/MWh)

Technology	QF Avoided Capacity, 2030 Need, KU (with line losses)			QF Avoided Capacity, 2030 Need, LG&E (with line losses)		
	2-Year PPA	7-Year PPA Beginning: 2026	7-Year PPA Beginning: 2027	2-Year PPA	7-Year PPA Beginning: 2026	7-Year PPA Beginning: 2027
Solar: Single-Axis Tracking	0.00	14.57	20.22	0.00	14.26	19.78
Solar: Fixed Tilt	0.00	13.95	19.35	0.00	13.65	18.93
Wind	0.00	7.33	10.17	0.00	7.17	9.95
Other Technologies	0.00	8.31	11.53	0.00	8.13	11.28

Table 18: Qualifying Facility All-In Avoided Cost Rates for 2-Year and 7-Year PPAs by Company, with Line Losses ($/MWh)

	QF All-In Avoided Cost Rate, KU		QF All-In Avoided Cost Rate, LG&E	
	2-Year PPA	2026/2027 Avoided Cost Rate	2-Year PPA	2026/2027 Avoided Cost Rate
Solar: Single-Axis Tracking	33.02	55.89	32.40	54.79
Solar: Fixed Tilt	33.05	55.24	32.43	54.15
Wind	32.07	45.34	31.47	44.46
Other Technologies	31.99	46.98	31.38	46.06

KENTUCKY UTILITIES COMPANY

Response to Commission Staff's Post-Hearing Request for Information
Dated November 12, 2025

Case No. 2025-00113

Question No. 41

Responding Witness: Heather D. Metts / Peter W. Waldrab

Q-41. Refer to the Hearing Testimony of Drew McCombs and KU's response to the Attorney General/Kentucky Industrial Utility Customers (Attorney General/KIUC)'s Second Request for Information, Item 39.

a. Explain the decrease for maintenance of overhead lines and operation supervision and engineering between the base period and test period.

b. Explain the benefits of including some amount of storm damage expense in the revenue requirement versus deferring all storm damage costs.

A-41.

a. The decrease in the test year from the base year in maintenance of overhead lines is $12.7 million and in operations supervision and engineering is $1.5 million. The base period includes significant costs for the September 27, 2024 and January 5, 2025 major storms (which were deferred through regulatory assets). The test year is based on a 5-year historical average of storm costs excluding any regulatory asset level storms.

b. Inclusion of the 5-year average amount of storm damage expenses will provide the Commission insight into the level of storm damage expenses incurred by the Company in relation to past experience. Additionally, inclusion of the 5-year average in base rates will serve to mitigate intergenerational inequities and future rate increases should storm damages increase or decrease during the period. Lastly, the inclusion of the 5-year average will reduce the associated carrying costs the Company will incur and bear between rate cases and customers will bear following rate cases.

KENTUCKY UTILITIES COMPANY

Response to Commission Staff's Post-Hearing Request for Information Dated November 12, 2025

Case No. 2025-00113

Question No. 42

Responding Witness: Michael E. Hornung / Charles R. Schram

Q-42. Refer to the Hearing Testimony of Michael E. Hornung (Hornung Hearing Testimony). Refer also to the Direct Testimony of Michael E. Hornung, page 3. Explain how the rates for the Residential Time-of-Day tariffs can vary based upon service territory, but the peak times do not vary based upon utility-specific system peaks.

A-42. KU and LG&E have planned and operated their electric generation on a combined, integrated basis since they merged almost thirty years ago.[12] Therefore, the Companies' combined system peaks and energy needs drive generation investments and energy requirements, not utility-specific peaks or energy needs. That is why the Companies' RTOD peak times are the same for both Companies; the goal of the RTOD rates is to incentivize customers to move their usage off-peak, which is a combined-system concern, not a utility-specific concern. (Note that this is also why all the Companies' other time-differentiated rates' base, intermediate, and peak periods (as applicable) are the same across the Companies' electric tariffs.)

But the Companies have different RTOD *rates* for the same reason they have different RS, GS, PS, and all other rates; namely, LG&E and KU have different costs of service. Each utility's different embedded costs and billing determinants help determine the rates for each rate schedule and its rate components (e.g., Basic Service Charge and time-of-day rates). Therefore, it is appropriate and logical for the Companies to have the same peak periods for their RTOD rate schedules while having different rates for each of the Companies' RTOD rate schedules.

[12] *See, e.g., Joint Application of Louisville Gas and Electric Company and Kentucky Utilities Company for Approval of Merger*, Case No. 97-300, Order at 18-19 (Ky. PSC Sept. 12, 1997) ("After the merger, the generation and transmission systems of KU and LG8E will be operated and planned on an integrated basis. Planning objectives will be to maximize the economy, efficiency, and reliability of the system as a whole. Generation units with the lowest variable operating costs will be dispatched first, irrespective of ownership.").

KENTUCKY UTILITIES COMPANY

Response to Commission Staff's Post-Hearing Request for Information
Dated November 12, 2025

Case No. 2025-00113

Question No. 43

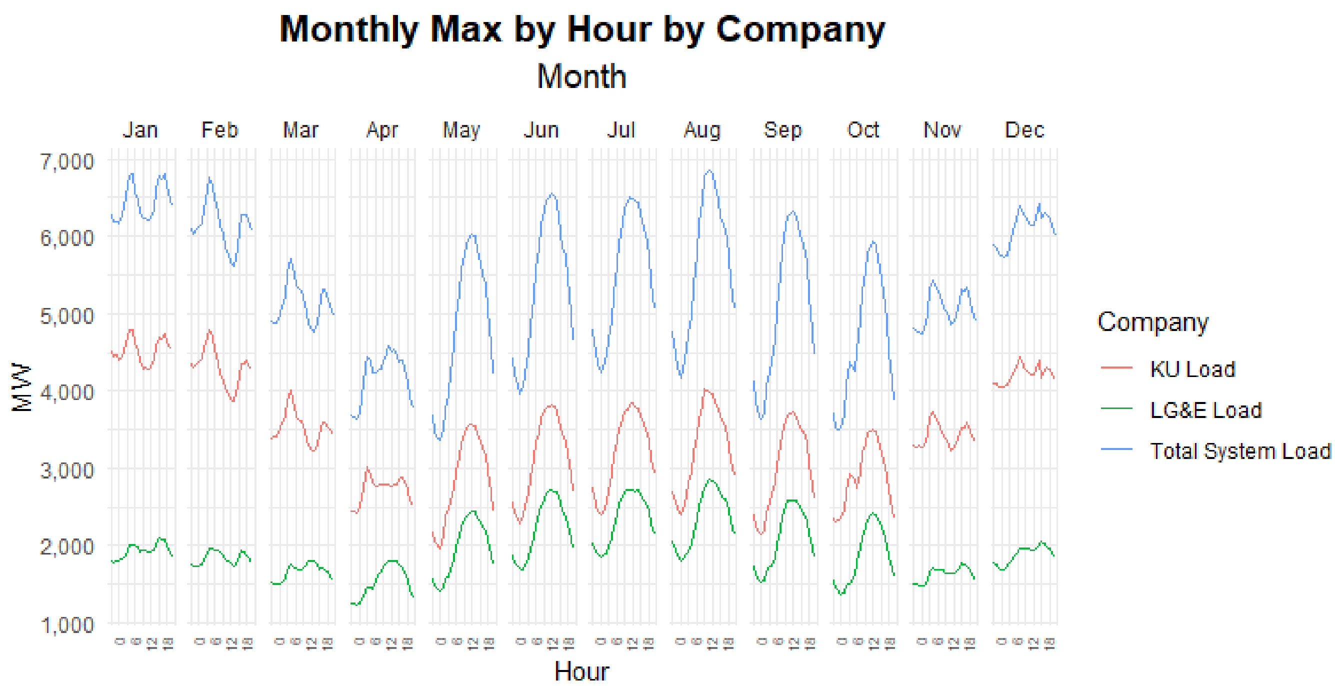
Responding Witness: Michael E. Hornung / Charles R. Schram

Q-43. Refer to the Hornung Hearing Testimony. Provide the monthly residential peak periods for KU only, excluding any data related to LG&E customers.

A-43. See the response to Question No. 42. The Companies plan the system based on system load as a whole and not solely for the residential class. The Companies do not have the requested peak data for the residential class only, so the figure below shows the monthly maximum loads by hour since 2010 on the KU and LG&E systems individually alongside the combined load for the total system.[13] Note that for both Companies the summer months show an afternoon peak period over the course of 4 or 5 hours, consistent with the RTOD peak summer period. However, the winter months, particularly some of the highest peaks ever experienced in January and December, show both morning and evening peak periods for the total system and KU. Peak winter loads in LG&E tend to occur in the evenings. The LG&E system is typically summer peaking due to the high incidence of natural gas heating within the service territory

See also the attachment providing the underlying data to the chart below.

[13] Excluding load associated with the departed municipal customers. The KU system and total system include ODP.


Monthly Max by Hour by Company
Month
Jan
Feb
Mar
Apr
May
Jun
Jul
Aug
Sep
Oct
Nov
Dec
MW
7,000
6,000
5,000
4,000
3,000
2,000
1,000
0 6 12 18
Hour
Company
KU Load
LG&E Load
Total System Load

KENTUCKY UTILITIES COMPANY

Response to Commission Staff's Post-Hearing Request for Information
Dated November 12, 2025

Case No. 2025-00113

Question No. 44

Responding Witness: Michael E. Hornung

Q-44. Refer to the Hornung Hearing Testimony. Explain in detail why LG&E/KU utilized combined system data to specify the peaks in residential time of day (RTOD), rather than utility-specific peaks.

A-44. See the response to Question No. 42.

KENTUCKY UTILITIES COMPANY

Response to Commission Staff's Post-Hearing Request for Information
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Case No. 2025-00113

Question No. 45

Responding Witness: Michael E. Hornung / Peter W. Waldrab

Q-45. Refer to the Hornung Hearing Testimony. Explain why an anti-islanding safety feature should be added to the Net Metering Interconnection Guidelines.

A-45. Anti-islanding features are a crucial safety function of a distributed generation resource that prevents the inverter from supplying power to a de-energized utility source. Supplying power to a de-energized utility source creates a dangerous "island" resulting in safety hazards for utility workers or potential damage to utility equipment. This feature should be explicitly added to the interconnection requirements to ensure the safety of utility workers, the public, and utility-owned assets. Anti-islanding safety features are native on any inverter that is UL1741 and IEEE1547 compliant.

KENTUCKY UTILITIES COMPANY

Response to Commission Staff's Post-Hearing Request for Information
Dated November 12, 2025

Case No. 2025-00113

Question No. 46

Responding Witness: Michael E. Hornung

Q-46. Refer to the Hornung Hearing Testimony. Provide the language that will be added to the General Service (GS) and Power Service (PS) tariffs if the Commission approves KU's proposal regarding legacy GS/PS customers.

A-46. If the Commission approves the provisions contained in Section 9.10 of the Stipulation and Recommendation, the Companies would add the following language to the availability section of both the Rate GS and Rate PS tariff sheets:

"Customers who are receiving service under this tariff who meet the availability terms as of January 1, 2026 will no longer be eligible for the grandfathered status as outlined above."

KENTUCKY UTILITIES COMPANY

Response to Commission Staff's Post-Hearing Request for Information
Dated November 12, 2025

Case No. 2025-00113

Question No. 47

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

Q-47. Refer to Hornung Hearing Testimony. Assuming the Commission approves KU's proposal regarding legacy GS/PS customers, explain whether LG&E/KU would commit to pre-emptively communicating and working with the affected customers in the future if their usage indicates that they are on the path to being moved to another rate schedule.

A-47. If approved, the only customers impacted would be those already on the appropriate rate, so there will be no change to assigned rates. In the future, any updates to tariffs or rates for which the customer is served will be communicated through standard business practices.

KENTUCKY UTILITIES COMPANY

Response to Commission Staff's Post-Hearing Request for Information
Dated November 12, 2025

Case No. 2025-00113

Question No. 48

Responding Witness: John Bevington / Michael E. Hornung

Q-48. Refer to Hornung Hearing Testimony. Explain when KU changed its policy regarding Transmission Service Requests (TSR) and Related Implementation costs. Include in the response the amounts collected by KU in relation to TSRs and Related Implementation Costs since the policy was changed.

A-48. For the sake of clarity, there was not a written policy on this topic prior to the filing of the proposed tariff provision. Therefore, it might be better described as a change in practice, though the Company acknowledges discussing it as a change in policy at the hearing in this proceeding.

Beginning about 2021, KU changed its practice regarding Transmission Service Requests (TSRs) for prospective customers requesting studies to determine transmission capacity at project specific locations prior to finalizing investment decisions. KU changed its practice after it began receiving a number of such requests related to projects such as cryptocurrency mining. More recently, such requests have primarily concerned prospective data center projects.

Since the change in practice concerning these prospective customer projects, KU has collected deposits for each TSR requested to be studied by the Independent Transmission Operator (ITO), as required under the FERC Open Access Transmission Tariff (OATT). These deposits cover all actual costs of the TSR study, and any remaining balance is refunded to the customer.

The following TSRs have each had a deposit paid by the requesting customer that was held for services by either KU or LG&E:

TSR Request	Company	Deposit
LGE-TSR-2022-003	KU	$25,000
LGE-TSR-2024-001	LG&E	$50,000
LGE-TSR-2024-011	LG&E	$50,000
LGE-TSR-2024-012	LG&E	$75,000
LGE-TSR-2024-013	LG&E	$75,000
LGE-TSR-2024-014	ODP	$75,000
LGE-TSR-2024-015	KU	$75,000
LGE-TSR-2025-004	LG&E	$75,000
LGE-TSR-2025-005	KU	$75,000
LGE-TSR-2025-006	LG&E	$75,000
LGE-TSR-2025-010	LG&E	$75,000
LGE-TSR-2025-011	KU	$75,000

Regarding Related Implementation costs, there is not a precise date when the practice changed, though it is arguably when the Company's sister utility, LG&E, entered into its reimbursement agreement concerning the Camp Ground Road data center, which was first effective on July 1, 2024. The Company has entered into no such agreements and thus has not collected any such costs since the practice change.

KENTUCKY UTILITIES COMPANY

Response to Commission Staff's Post-Hearing Request for Information Dated November 12, 2025

Case No. 2025-00113

Question No. 49

Responding Witness: Michael E. Hornung

Q-49. Refer to the Hornung Hearing Testimony. Explain whether a decrease to a Net Metering Service-1 (NMS-1) eligible customer-generator's generation capacity would result in the loss of NMS-1 legacy status.

A-49. A customer would not lose NMS-1 legacy status with a decrease in generation capacity.

KENTUCKY UTILITIES COMPANY

Response to Commission Staff's Post-Hearing Request for Information
Dated November 12, 2025

Case No. 2025-00113

Question No. 50

Responding Witness: Michael E. Hornung / Counsel

Q-50. Refer to the Hornung Hearing Testimony. Explain whether any increase to a NMS-1 eligible customer generator's generation capacity, no matter the size, would result in the loss of NMS-1 legacy status.

A-50. A customer would lose NMS-1 legacy status with an increase in generation capacity.

Note that this policy is consistent with KRS 278.466(6) and KRS 278.466 more broadly. KRS 278.466(3) and (4) *require* a utility to compensate net metering customers using a dollar-denominated bill credit after such is established for a utility; the only exception, which KRS 278.466(6) creates, is for "an eligible electric generating facility *in service prior to the effective date of the initial net metering order* by the commission in accordance with subsection (3) of this section …."[14] Arguably, even a replacement due to a repair of some or all of a legacy NMS-1 eligible electric generating facility would no longer qualify for legacy status under KRS 278.466(6) because it was not "in service prior to the effective date of the initial net metering order." That is not the position the Company has taken regarding a repair of an otherwise legacy NMS-1 facility that does not increase the facility's total capacity, but it shows the reasonableness of the Company's position concerning loss of legacy status for facility owners who choose to increase their facilities' capacity.

[14] Emphasis added.

KENTUCKY UTILITIES COMPANY

Response to Commission Staff's Post-Hearing Request for Information
Dated November 12, 2025

Case No. 2025-00113

Question No. 51

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

Q-51. Refer to the Direct Testimony of Tim S. Lyons, page 29, lines 15-16.

a. Explain how KU determined its inflation factor for its special charges cost justification.

b. Explain whether the Commission has ever accepted an adjustment to special charges based upon an inflation factor and identify any such instances.

A-51.

a. The inflation factor was derived from the wage index assumption in Tab 60 of Filing Requirements (807 KAR 5:001 Section 16(8)(g) Attachment 3 Page 28 of 35).

b. The Companies are aware of the Commission approving special charges that included an inflation factor in their most recent rate cases:

- In the Companies' 2020 base rate cases, the Commission approved the Companies' proposed meter pulse charges,[15] and the workpapers for those charges explicitly show inflation adjustments.[16]

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[15] *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, Order Appx. B at 9 (Ky. PSC June 20, 2021) (approving meter pulse charge of $21.00); *Electronic Application of Louisville Gas and Electric Company for an Adjustment of Its Electric and Gas 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. 2020-00350, Order Appx. B at 10 and 14 (Ky. PSC June 20, 2021) (approving electric meter pulse charge of $21.00 and gas meter pulse charges of $8.00 for Rate FT or Rider TS-2 and $28.00 for other).

[16] Case No. 2020-00349, Attachment to KU Response to PSC 2-126 (Jan. 22, 2021), available at https://psc.ky.gov/pscecf/2020-00349/mike.hornung%40lge-ku.com/01222021010255/2020_PSC_DR2_KU_Attach_to_Q126.xlsx (see "KU Meter Pulse" and "KU Meter Pulse – 5-Year" tabs); Case No. 2020-00350, Attachment to LG&E Response to PSC 1-56 (Dec. 15, 2020), available at https://psc.ky.gov/pscecf/2020-00350/rick.lovekamp%40lge-ku.com/12152020013044/2020_Att_KU_LGE_PSC_1-56_Exhibit_WSS-19_Special_Charges.xlsx (see

- In the Companies' 2018 base rate cases, the Companies proposed changes to their returned check and meter pulse charges, all of which explicitly included inflation adjustments.[17] The Commission ultimately approved returned check and meter pulse charges in those cases that explicitly included inflation adjustments,[18] though the meter pulse charges were slightly lower due to cost adjustments resulting from the stipulation, not a removal of inflation adjustments.[19]

"LGE-E Meter Pulse – 5-Year" tab); Case No. 2020-00350, Attachment to LG&E Response to PSC 2-140 (Jan. 22, 2021), available at https://psc.ky.gov/pscecf/2020-00350/rick.lovekamp%40lge-ku.com/01222021123342/2020_PSC_DR2_LGE_Attach_to_Q140_-_electric_meter_pulse.xlsx (see "LGE-E Meter Pulse" and "LGE-E Meter Pulse – 5-Year" tabs); Case No. 2020-00350, Attachment to LG&E Response to PSC 2-141 (Jan. 22, 2021), available at https://psc.ky.gov/pscecf/2020-00350/rick.lovekamp%40lge-ku.com/01222021123342/2020_PSC_DR2_LGE_Attach_to_Q141_--_gas_meter_pulse.xlsx (see "LGE-G Meter Pulse" and "LGE Gas Meter Pulse – 5-Year" tabs).

[17] *Electronic Application of Kentucky Utilities Company For an Adjustment of Its Electric Rates*, Case No. 2018-00294, Direct Testimony of William Steven Seelye at Exh. WSS-17 (Sept. 28, 2018), *available at* https://psc.ky.gov/pscecf/2018-00294/derek.rahn%40lge-ku.com/09282018074941/12_-_KU_Testimony_and_Exhibits_3_of_3.pdf; *Electronic Application of Louisville Gas and Electric Company For An Adjustment of Its Electric and Gas Rates*, Case No. 2018-00295, Direct Testimony of William Steven Seelye at Exh. WSS-17 (Sept. 28, 2018), *available at* https://psc.ky.gov/pscecf/2018-00295/derek.rahn%40lge-ku.com/09282018081716/12_-_LGE_Testimony_and_Exhibits_3_of_3.pdf.

[18] Case No. 2018-00294, Order Appx. B at 8 (Ky. PSC Apr. 30, 2019) (approving $3.00 returned payment charge and $24.00 meter pulse charge); Case No. 2018-00295, Order Appx. B at 9 (Ky. PSC Apr. 30, 2019) (approving $3.00 returned payment charge and $24.00 meter pulse charge).

[19] Case No. 2018-00294, Attachment to KU Response to PSC PHDR 8 (Mar. 20, 2019), *available at* https://psc.ky.gov/pscecf/2018-00294/rick.lovekamp%40lge-ku.com/03202019111719/2018_PSC_PH_KU_Attach_to_Q8_-_WSS-17_-_Settlement_-_Cost_Support_for_Special_Charges.xlsx; Case No. 2018-00295, Attachment to LG&E Response to PSC PHDR 12 (Mar. 20, 2019), *available at* https://psc.ky.gov/pscecf/2018-00295/rick.lovekamp%40lge-ku.com/03202019112458/2018_PSC_PH_LGE_Attach_to_Q12_-_WSS-17_-_Settlement_-_Cost_Support_for_Special_Charges.xlsx.

KENTUCKY UTILITIES COMPANY

**Response to Commission Staff's Post-Hearing Request for Information
Dated November 12, 2025**

Case No. 2025-00113

Question No. 52

Responding Witness: Vincent Poplaski

Q-52. Refer to KU's response to Staff's First Request, Item 41. KU's response to the request was not responsive. Provide the information listed in 41 (a)-(o) as requested in the format of Schedule K. For each executive officer, list out by name and titles. In schedule K, be sure to provide the amounts, in gross dollars, separately for total company operations and jurisdictional operations information individually for each corporate officer. For clarity, total company operations refer to PPL Corporation and all subsidiaries. Provide also the following listed items:

a. Overtime pay, individually for each executive officer, or a statement that there is none;

b. Confirmation that the bonus listed in Attachment 3 includes incentive compensation. If not confirmed, provide total incentive compensation for each executive officer;

c. The stock options for each individual corporate officer;

d. Total deferred compensation for each individual corporate officer;

e. The total company operations compensation amount and total jurisdiction operations compensation amount for each individual corporate officer; and

f. A description for Attachment 3, as none was included in the body of the data response.

A-52. See attachment being provided in a separate file. The information requested is confidential and proprietary and is being provided under seal pursuant to a petition for confidential protection.

a. Executive officers do not receive overtime pay.

b. Confirmed. The bonus column on Attachment 3 to the response to PSC 1-41 includes the total incentive compensation (both short- and long-term incentive pay, as well as any other discretionary bonuses) for each executive officer listed.

c. The company no longer grants stock options. The Company does grant equity-based compensation that are not stock options. For example, the Company grants restricted stock units and performance units. The performance units are only granted to executives.

d. Deferred compensation is made up of several things: Long-term incentive compensation is included in incentive pay, as noted in response to part b. above; non-qualified deferred compensation (meaning outside of 401(k) governance) is part of base pay. Non-qualified matching amounts are included in Other, column W of Schedule K.

e. See attachment being provided in a separate file. The individual corporate officers listed in response to PSC-41 receive a single paycheck. They do not receive compensation for "total company operations" separate from their compensation for "total jurisdiction operations." The attached Excel file in the format of Schedule K shows the individual officers' base salary, their incentive pay, and any additional salary and benefit information, as requested in the LKS "Officers" tab. All compensation information included in the Schedule K is based on actual, W-2 reported earnings. Therefore, incentive pay in the Schedule K is included based on earned (not target) amounts. The individual officers' incentive pay is not shown in the LG&E and KU tabs because incentive pay for those officers is not allocated to the utilities and is therefore not in the cost of service in these proceedings. Likewise, incentive pay for non-executive officers is not in the LKS tab. Rather, it is in the LG&E and KU Schedule K tabs because it is allocated to the utilities and it is included in the cost of service in these proceedings. The tab in the Excel file entitled "Allocation from REG Accounting" shows the percentage allocations to LG&E, KU and other subsidiaries for the individual officers' base salary.

f. Attachment 3 to the response to PSC 1-41 lists the wages for LG&E and KU Services Company officers from 2021 through February of 2025. For each officer listed by title, it provides their base compensation, their vacation payout for unused vacation hours, their bonus (which includes all incentive pay as discussed in part b. above) and other compensation (which includes any other perquisites that officers receive, such as group term life insurance, relocation (2022 only), vehicle allowance (2021-2023 only; the company no longer provides this), executive physical , financial planning, tax preparation, wellness reimbursement, executive auto lease difference (2023 only) and non-qualified stock options (2021 only; the company no longer grants stock options).

KENTUCKY UTILITIES COMPANY

Response to Commission Staff's Post-Hearing Request for Information
Dated November 12, 2025

Case No. 2025-00113

Question No. 53

Responding Witness: Andrea M. Fackler / Michael E. Hornung

Q-53. Refer to the Hearing Testimony of Andrea M. Fackler regarding the revisions to KU's Retired Asset Recovery tariff (Tariff RAR). Provide an updated clean and redlined version of KU's Tariff RAR based on Ms. Fackler's statement that the removal of the concept of jurisdicationalizing the revenue requirement for KU's retired generating units was an error.

A-53. See attachments being provided in separate files. The yellow highlighted text in the redline tariff signifies the text that was inadvertently deleted and has been added back into the tariff.

KENTUCKY UTILITIES COMPANY

Response to Commission Staff's Post-Hearing Request for Information
Dated November 12, 2025

Case No. 2025-00113

Question No. 54

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

Q-54. Provide the following allocations for a period of 15 years beginning in the first year of in-service for Mill Creek 5: (1) capital costs; (2) operating costs and (3) return on the costs of a combined cycle for each respective customer class:

a. Using the COSS(s) provided in a rate application, and

b. If recovered via the proposed generation cost recovery mechanism.

c. Include in this response a narrative description of the notable differences in results for each customer class.

d. Provide the responses to part (a) and part (b) in Excel spreadsheet format with all formulas, rows, and columns unprotected and fully accessible.

A-54.

a-b. See the attachment being provided in a separate file. Certain information requested is confidential and proprietary and is being provided under seal pursuant to a petition for confidential protection.

c. The differences in allocation results between the methodologies are primarily due to the basis for the allocator used – one is revenue based and one is production cost based – and that the base rate allocation is cost-based while the revenues are based on the stipulation reached in this proceeding. Note that residential customers would receive lower cost allocations under the Adjustment Clause GCR allocation methodology than they would under a base rate allocation approach.

d. See the response to part (a).