

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

**LEXINGTON-FAYETTE URBAN COUNTY GOVERNMENT'S
SECOND REQUEST FOR INFORMATION TO KENTUCKY UTILITIES**

In accordance with the Public Service Commission's ("Commission") June 18, 2025, Order, Intervenor Lexington-Fayette Urban County Government ("LFUCG") propounds the following data requests upon the Applicant Kentucky Utilities ("KU"). KU shall respond to these requests in accordance with the provisions of the Commission's June 18, 2025, Order, applicable regulations, and the instructions set forth below.

INSTRUCTIONS

1. Please provide written responses, together with any and all exhibits pertaining thereto, separately indexed and tabbed by each response.
2. The responses provided should restate LFUCG's request and also identify the witness(es) responsible for supplying the information.
3. If any request appears confusing, please request clarification directly from counsel for LFUCG.

4. Please answer each designated part of each information request separately. If you do not have complete information with respect to any item, please so state and give as much information as you do have with respect to the matter inquired about, and identify each person whom you believe may have additional information with respect thereto.

5. To the extent that the specific document, workpaper, or information does not exist as requested, but a similar document, workpaper, or information does exist, provide the similar document, workpaper, or information.

6. To the extent that any request may be answered by way of a computer printout, please identify each variable contained in the printout which would not be self-evident to a person not familiar with the printout.

7. If KU objects to any request on any grounds, please notify counsel for LFUCG as soon as possible.

8. For any document withheld on the basis of privilege, state the following: date; author; addressee; blind copies; all persons to whom distributed, shown, or explained; and, the nature and legal basis for the privilege asserted.

9. In the event any document called for has been destroyed or transferred beyond the control of the company, state the following: the identity of the person by whom it was destroyed or transferred, and the person authorizing the destruction or transfer; the time, place, and method of destruction or transfer; and, the reason(s) for its destruction or transfer. If destroyed or disposed of by operation of a retention policy, state the retention policy.

10. These requests shall be deemed continuing so as to require further and supplemental responses if the company receives or generates additional information within the scope of these requests between the time of the response and the time of any hearing conducted hereon.

Respectfully submitted,



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**LFUCG'S SECOND REQUEST FOR INFORMATION
TO KENTUCKY UTILITIES COMPANY**

1. Refer to the Companies' proposed Green Tariff.
 - a. Confirm that Green Tariff Option #3 is limited to a customer contracting for a minimum monthly billing load of 10 MVA (or MW as is appropriate), but that a customer with multiple accounts may aggregate those accounts for the sole purpose of meeting the 10 MVA requirement.
 - b. Confirm that Green Tariff Option #3 is available as a rider to customers to be served *only* under Company's Standard Rate Schedules TODS, TODP, RTS, EHLF, and FLS.
 - c. Confirm that the aggregation of accounts identified in (a) above is limited to those accounts in Rate Schedules TODS, TODP, RTS, EHLF, and FLS.
 - d. Confirm that Green Tariff Option #2 is available as a rider to customers receiving service under Company's standard GS, GTOD-Energy, GTOD-Demand, PS, TODS, TODP, RTS, or FLS rate schedules.
 - e. Explain why the Companies do not allow customers under Green Tariff Option #3 to aggregate accounts under accounts under GS, GTOD-Energy, GTOD-Demand, and PS.
2. Refer to the Direct Testimony of Lyons at page 27, line 9. Provide a detailed narrative describing the differences in how the proposed base rates for the LS rate class were determined in comparison to the proposed base rates for the RLS rate class.
3. Refer to the responses to Items 1 and 3 of LMG's and LFUCG's First Requests for Information, in which the Companies indicate that the proposed rates in Rate LS are based on new lighting installations. Identify every other rate classification within the Companies' current or proposed tariff for which the rate design is based on the cost of new or future installations.
4. Refer to the responses to Item 13 of Louisville Metro Government's ("LMG") and LFUCG's First Requests for Information, which state in part: "Most existing RLS fixtures have a comparable LED with a lower monthly rate." Identify each RLS fixture that does not have a comparable LED with a lower monthly rate than its RLS counterpart. Include within your answer the RLS fixture and its proposed monthly rate, as well as the comparable LED fixture and its proposed rate.
5. Refer to Items 18 and 20 of LMG's and LFUCG's First Requests for Information, which request the number of certain accounts as of June 30 on each year since 2020. The attachments to the responses include a column for a "Grand Total." Explain what the "Grand Total" amounts reflect.
6. Refer to the responses to Item 14 of LMG's and LFUCG's First Requests for Information, which indicates that 46.4% of outdoor lights provided "by the Company" to customers are LED lights. Confirm that both KU and LG&E individually have 46.4% of outdoor lights in each Company's system that are LED lights. If this is incorrect, please

- identify the percentage of streetlights throughout KU's system that is an LED light and the percentage of streetlights throughout LG&E's system that is an LED light.
7. Refer to responses to Item 18 of LMG's and LFUCG's First Requests for Information. For KU, if totals in the attachment for LED lights in June 2025 are summed, it appears to indicate that there are 18,542 LED lights out of 64,770 total lights in KU's system, which would be 28.6%. For LG&E, if totals in the attachment for LED lights in June 2025 are summed, it appears to indicate that there are 6,399 LED lights out of 21,562 total lights in LG&E's system, which would be 29.7%.
 - a. Confirm that these totals and calculated percentages are accurate. If not, please explain why they are not.
 - b. Explain why the percentage of LED lights shown in the responsive attachments do not equal the percentage (46.4%) identified in the Companies' responses to Item 14 of LMG's and LFUCG's First Requests for Information.
 8. Refer to the Wood Pole - Rate Code PK5 for KU and PL5 for LG&E.
 - a. Identify the number of accounts for each of those two rate codes as of June 30 on each year since 2020.
 - b. These rate codes fall under the Companies' designation for overhead service. Explain what circumstances would exist for the Companies to charge this rate to customers.
 9. Refer to responses to Item 23 of LMG's and LFUCG's First Requests for Information. KU indicated that it has had 266, 1052, and 1374 replacements for Rate RLS in each of the last three years in its jurisdictional system. LG&E indicated that it had 1,846, 1,994, and 1,736 in each of the last three years.
 - a. Confirm that each of these replacements would have resulted in a lighting fixture from Rate RLS be replaced with a fixture from Rate LS.
 - b. Both KU responded that they "would anticipate a similar amount over the next 5 years." KU has experienced approximately 5 times the replacements in 2024 compared to 2022. Does KU expect replacements over the next 5 years to be similar to the 2022 amount, to the 2024 amount, or to a continuing increasing trend? Explain your answer.
 10. Refer to responses to Item 24 of LMG's and LFUCG's First Requests for Information and Exhibit WSS-5 of Steve Seelye's direct testimony in the 2020 Rate Case. For KU and LG&E individually, please identify the following:
 - a. The number of fixtures and the date on which that number is based;
 - b. The most current Net Book Value;
 - c. The estimated percent of the Net Book Value for Poles and Fixtures; and
 - d. The underlying facts on which the estimated percentages in (c) were based.
 11. Refer to Schedule M-2.3 at page 26 of 31 for KU and Schedule M-2.3-E at page 25 of 31 for LG&E. Explain why the Companies do not include any forecasted revenue for Lighting Service conversions.

12. In responses to Item 35 of LMG's and LFUCG's First Requests for Information, which related to technological advancements and improved communications with customers, the Companies stated: "The Company is exploring the feasibility of adding functionality to their mobile app that would enable users to report street light outages by using a map to identify and select the streetlight in question." A similar question was asked by LMG and LFUCG in the 2020 rate case (Item 25), in which the Companies stated, "The Company is considering the feasibility of developing this type of feature on the Company's App or Website, but has no definitive plans for deployment." Detail and explain the Companies' progress over the last five years on this issue.
13. Refer to the responses to Item 50(b) of LMG's and LFUCG's First Requests for Information.
 - a. State whether the Companies' proposed changes to NMS-2 will impact existing customers on the NMS-2 rate schedule.
 - b. State whether the Companies' proposed changes to NMS-2 will impact existing customers on the NMS-1 rate schedule.
14. Refer to the Companies' Net Metering Service proposed tariffs. Explain to whom the proposed changes will apply. Include within your answer whether any existing customers on the NMS-1 or NMS-2 rate schedules will be grandfathered into any provisions and, if so, which ones.
15. Refer to the responses to Item 50(b) of LMG's and LFUCG's First Requests for Information, in which the Companies indicate that "no RTS or potential EHLF customers have expressed interest in opting into Rider SSP to date." Describe in detail communications the Companies have had with potential EHLF customers related to clean-energy-procurement needs and what options would be available to those potential customers.
16. Refer to TSL-2 at page 3 of 4, which indicates KU has rate base of \$160,397,661 within Rate LS & RLS and TSL-5 at page 3 of 4, which indicates LG&E has rate base of \$137,446,895 within Rate LS & RLS.
 - a. Identify the rate base for each Company within Rate LS.
 - b. Identify the rate base for each Company within Rate RLS
 - c. If the Companies cannot delineate rate base between Rate LS and Rate RLS, explain why not.
17. Identify each Companies' rate base associated with LED lighting.
18. Identify each Companies' rate base associated with non-LED lighting.