

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

In the Matter of:

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

In the Matter of:

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

**POSTHEARING REQUESTS FOR INFORMATION OF JOINT
INTERVENORS KENTUCKIANS FOR THE COMMONWEALTH,
KENTUCKY SOLAR ENERGY SOCIETY, METROPOLITAN HOUSING
COALITION AND MOUNTAIN ASSOCIATION TO KENTUCKY
UTILITIES COMPANY AND LOUISVILLE GAS AND ELECTRIC
COMPANY**

Dated: November 12, 2025

DEFINITIONS

1. "Document" means the original and all copies (regardless of origin and whether or not including additional writing thereon or attached thereto) of any memoranda, reports, books, manuals, instructions, directives, records, forms, notes, letters, or notices, in whatever form, stored or contained in or on whatever medium, including digital media.
2. "Study" means any written, recorded, transcribed, taped, filmed, or graphic matter, however produced or reproduced, either formally or informally, a particular issue or situation, in whatever detail, whether or not the consideration of the issue or situation is in a preliminary stage, and whether or not the consideration was discontinued prior to completion.
3. "Person" means any natural person, corporation, professional corporation, partnership, association, joint venture, proprietorship, firm, or the other business enterprise or legal entity.
4. A request to identify a natural person means to state his or her full name and business address, and last known position and business affiliation at the time in question.
5. A request to identify a document means to state the date or dates, author or originator, subject matter, all addressees and recipients, type of document (e.g., letter, memorandum, telegram, chart, etc.), identifying number, and its present location and custodian. If any such document was but is no longer in the Company's possession or subject to its control, state what disposition was made of it and why it was so disposed.
6. A request to identify a person other than a natural person means to state its full name, the address of its principal office, and the type of entity.
7. "And" and "or" should be considered to be both conjunctive and disjunctive, unless specifically stated otherwise.
8. "Each" and "any" should be considered to be both singular and plural, unless specifically stated otherwise.

9. Words in the past tense should be considered to include the present, and words in the present tense include the past, unless specifically stated otherwise.
10. “You” or “your” means the person whose filed testimony is the subject of these data requests and, to the extent relevant and necessary to provide full and complete answers to any request, “you” or “your” may be deemed to include any other person with information relevant to any interrogatory who is or was employed by or otherwise associated with the witness or who assisted, in any way, in the preparation of the witness’ testimony.
11. “Companies”, “Kentucky Utilities Company and Louisville Gas & Electric Company”, or “LG&E-KU”, means Kentucky Utilities Company and Louisville Gas & Electric Company, their parents or subsidiaries, and/or any of its officers, directors, employees or agents who may have knowledge of the particular matter addressed, and affiliated companies including member cooperatives.
12. “Joint Intervenors” means Kentuckians for the Commonwealth, Kentucky Solar Energy Society, Metropolitan Housing Coalition and Mountain Association who have been moved for the status of full intervention as joint intervenors in this matter.
13. Unless otherwise specified in each individual request the term “tariff” means the tariff as filed in this matter by LG&E-KU.
14. “Commission” or “PSC” means the Kentucky Public Service Commission, including its Commissioners, personnel, and offices.
15. “ROE” means “return on equity.”
16. “SCR” means “selective catalytic reduction.”
17. “SM” means “Sharing Mechanism.”
18. “GCR” means “Generation Cost Recovery.”
19. “HVT” means “hearing video transcript.”
20. “KHC” means “Kentucky Housing Corporation.”

INSTRUCTIONS

1. If any matter is evidenced by, referenced to, reflected by, represented by, or recorded in any document, please identify and produce for discovery and inspection each such document.
2. These requests for information are continuing in nature, and information which the responding party later becomes aware of, or has access to, and which is responsive to any request is to be made available to Joint Intervenors. Any studies, documents, or other subject matter not yet completed that will be relied upon during the course of this case should be so identified and provided as soon as they are completed. The Respondent is obliged to change, supplement and correct all answers to interrogatories to conform to available information, including such information as it first becomes available to the Respondent after the answers hereto are served.
3. Unless otherwise expressly provided, each data request should be construed independently and not with reference to any other interrogatory herein for purpose of limitation.
4. The answers provided should first restate the question asked and also identify the person(s) supplying the information.
5. Please answer each designated part of each information request separately. If you do not have complete information with respect to any interrogatory, 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.
6. In the case of multiple witnesses, each interrogatory should be considered to apply to each witness who will testify to the information requested. Where copies of testimony, transcripts, or depositions are requested, each witness should respond individually to the information request.
7. Wherever the response to a request consists of a statement that the requested information is already available to Joint Intervenors, please provide a detailed citation to the document that contains the information. This citation shall include the title of the document, relevant page number(s), and, to the extent possible, paragraph number(s) and/or chart/table/figure number(s).

8. If you claim a privilege including, but not limited to, the attorney-client privilege or the work product doctrine, as grounds for not fully and completely responding to any discovery request, please describe the basis for your claim of privilege in sufficient detail so as to permit Joint Intervenors or the Commission to evaluate the validity of the claim. With respect to documents for which a privilege is claimed, please produce a “privilege log” that identifies the author, recipient, date, and subject matter of the documents or interrogatory answers for which you are asserting a claim of privilege and any other information pertinent to the claim that would enable Joint Intervenors or the Commission to evaluate the validity of such claims.
9. Whenever the documents responsive to a discovery request consist of modeling files (including inputs or output) and/or workpapers, the files and workpapers should be provided in machine-readable electronic format (e.g., Microsoft Excel), with all formulas and cell references intact.
10. The interrogatories are to be answered under oath by the witness(es) responsible for the answer.

**POSTHEARING DATA REQUESTS PROPOUNDED TO
KENTUCKY UTILITIES COMPANY AND LOUISVILLE GAS
AND ELECTRIC COMPANY BY JOINT INTERVENORS**

Joint Intervenors hereby tender the following supplemental requests for information to the Companies:

- 4.1. Refer to the November 4, 2025 HVT at approximately 9:35 to 9:37 a.m.
 - a. Produce the analysis referenced by Witness Conroy comparing the method of cost allocation used in the Group 1/Group 2 approach to the cost allocation methodologies that would be used in base rates.
 - b. Produce any supporting workpapers, workbooks, modeling files, or other documents used in the analysis produced in response to subpart a.
 - c. Explain what base rate cost allocation methodologies were assumed in the analysis produced in response to subpart a.
 - d. State whether the base rate cost allocation methodologies assumed in the analysis produced in response to subpart a. are the same as the methodologies that the Companies currently use in allocating base rate costs. If not, explain how they are different.
- 4.2. Refer to the November 4, 2025 HVT at approximately 3:38 p.m. Produce each analysis supporting Mr. Garrett's belief that the Companies will underearn a 9.9% ROE, if any.
- 4.3. Refer to Witness Bellar's Hearing Testimony, November 4, 2025 HVT beginning at approximately 4:09 p.m.
 - a. Produce each press release issued by each of the Companies (e.g., PPL Corp., LG&E, KU) concerning these rate case proceedings.
 - b. Produce each press release issued by each of the Companies (e.g., PPL Corp., LG&E, KU) concerning Case No. 2025-00045.
- 4.4. Refer to Witness Crockett's Hearing Testimony, November 5, 2025 HVT beginning at approximately 11:21 a.m.

- a. Confirm that PPL's most-recent common stock dividend was paid October 1, 2025, at \$0.2725/share. If anything but confirmed, please state the date paid and amount of PPL's most-recent quarterly stock dividend.
- b. Confirm each of the following PPL annual dividends. If anything but confirmed, please provide PPL's annual dividend for each of the last three years.

Year	Annual Dividend (\$/share)
2025	\$1.09
2024	\$1.03
2023	\$0.96

- c. Confirm that PPL Corp has roughly 739 million outstanding shares. If anything but confirmed, please provide a specific explanation of the number of outstanding shares over at least the last twelve months.
- 4.5. Refer to the November 5, 2025 HVT at approximately 9:18 to 9:20 a.m.
- a. Produce the "bottom-up" capital and O&M plans for Mill Creek 2 referenced by Witness Bellar that are reflected in the Companies Supplemental Testimony Exhibit 5.
 - b. Identify the date that such plans were created.
 - c. Identify the capital and O&M costs that the Companies have incurred to date to keep Mill Creek 2 open until 2031 rather than retiring the unit in 2027.
- 4.6. Refer to the November 5, 2025 HVT at approximately 9:33 to 9:35 a.m., and the Companies' response to AG-KIUC Post-Hearing Data Request 1 in Case No. 2025-00045.
- a. Produce an updated version of the table in the referenced post-hearing data response to reflect the Companies' most recent forecast of the costs to reliably operate Mill Creek 2 through the anticipated 2031 in-service date of Mill Creek 6.
 - b. Identify the Companies' most recent forecast of the costs of extending the life of Mill Creek 2 beyond 2031, including the costs of:
 - i. SCR installation

- ii. incremental transmission costs
 - iii. any other notable life-extension costs
- 4.7. Refer to the November 5, 2025 HVT at approximately 11:25 to 11:43 a.m., Attachment 2 to Tab 60 of the Companies' Applications, and the Companies' Responses to the Commission Staff's First Request for Information number 41, as well as Commission Staff's Post-Hearing Request for Information to Kentucky Utilities Company and Commission Staff's Post-Hearing Request for Information to Louisville Gas and Electric Company number 31, and provide also the amount and value of any other forms of incentives, including stock options or forms of deferred compensation (specify) for the same period as requested by staff in the post-hearing data request (2020 through present day 2025), and by name and title, in full, for affiliates, parents, and subsidiaries for the employees listed in Attachment 2 to Tab 60 and attachment 3 to the Companies' Responses to the Commission Staff's First Request for Information number 41.
- 4.8. Refer to the November 5, 2025 HVT at approximately 3:28 to 3:31 p.m. and provide, by Company, the:
- a. most recent two years and forecasted three years of capital costs and new capacity associated with capacity-related distribution projects;
 - b. annual solar production of distributed energy systems; and
 - c. annual average solar availability factor.
- 4.9. Refer to the November 5, 2025 HVT at approximately 4:15 to 4:16 p.m. and provide the Companies' joint firm point-to-point transmission service rates over the most recent five years.
- 4.10. Refer to the November 6, 2025 HVT at approximately 11:38 to 11:43 a.m., and respond to the following:
- a. The total number of disconnections by Company for each month for 2020 through present day 2025;
 - b. The dates of any suspensions of disconnections due to Company policy; and
 - c. Explain whether the Companies analyze any trends in disconnections and causation, and provide any such analysis or reasons, or otherwise explain any apparent trends.

- 4.11. Refer to the November 6, 2025 HVT at approximately 11:43 a.m. Please produce the Companies' policies with regard to disconnections during periods of extreme weather.
- 4.12. Refer to the November 6, 2025 HVT at approximately 11:47 to 11:50 a.m.
- a. Please clarify whether disconnection of customers enrolled in prepay will be suspended during periods of extreme weather.
 - b. Please confirm that a customer on Prepay who has already been disconnected will not automatically be reconnected before or during periods of extreme weather.
- 4.13. Refer to the November 6, 2025 HVT at approximately 11:13 to 11:15 a.m. , and explain how a late payment in the period of July 2027, to July 2028, would impact the calculation of Kentucky-jurisdictional revenues, including if that payment remained outstanding at the end of the period for purposes of proposed Adjustment Clause SM.
- 4.14. Refer to the Rebuttal Testimony of Shannon L. Montgomery Vice President, Customer Services on Behalf of Kentucky Utilities Company and Louisville Gas and Electric Company
- a. Provide the communication between Kentucky Housing Corporation and the Companies referenced at page 16, lines 1-8, and any additional communications regarding the topic referenced there.
 - b. Have the Companies sought to determine or quantify the funds from the Infrastructure and Investment Jobs Act distributed by KHC? If so, please provide any such quantification.
- 4.15. Refer to the Companies' Response to Joint Intervenor Q-2.11. Please identify each column of data from the attachment that the Companies' utilized in calculating the following:
- a. The estimated collateral amount.
 - b. The estimated 15-year minimum demand charge obligation.

[Signature on next page]

Respectfully Submitted,



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CERTIFICATE OF SERVICE

In accordance with the Commission's July 22, 2021 Order in Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19*, this is to certify that the electronic filing was submitted to the Commission on November 12, 2025; that the documents in this electronic filing are a true representation of the materials prepared for the filing; and that the Commission has not excused any party from electronic filing procedures for this case at this time.



Byron L. Gary