COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matters of:

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

AND

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

KENTUCKY SOLAR INDUSTRIES ASSOCIATION, INC.
SUPPLEMENTAL REQUEST FOR INFORMATION TO
AND KENTUCKY UTILITIES COMPANY AND
LOUISVILLE GAS AND ELECTRIC COMPANY

Comes now the Kentucky Solar Industries Association, Inc. ("KYSEIA"), by and through counsel, and, in accordance with the Public Service Commission's Orders dated June 18, 2025, respectfully tenders its Supplemental Requests for Information to Kentucky Utilities Company ("KU") and Louisville Gas and Electric Company ("LG&E" and collectively "Companies") into the records of each of the above-styled cases.

1) In each case in which a request seeks information provided in response to a request of Commission Staff, reference to the Companies' response to the appropriate Staff request will be deemed a satisfactory response.
2) Please identify the Companies' witness who will be prepared to answer questions concerning the request during an evidentiary hearing.
3) These requests shall be deemed continuing and, therefore, require further and supplemental responses if the Companies receives or generate additional information within the scope of these request between the time of the response and the time of any evidentiary hearing held by the Commission.
4) If any request appears confusing, please request clarification directly from Counsel for KYSEIA as soon as reasonable.
5) To the extent that the specific document, workpaper, or information as requested does not exist, 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 who is not familiar with the printout.
7) If the Companies have any objections to any request on the grounds that the requested information is proprietary in nature, or for any other reason, please notify Counsel for KYSEIA as soon as reasonable.
8) For any document withheld on the basis of privilege, state the following: Date; author; addressee; indicated or blind copies; all person to whom distributed, shown, or explained; and the nature and legal basis for the privilege asserted.

9) In the event that any document called for has been destroyed or transferred beyond the control of the Companies, state: 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 policy.

10) As the Companies discover errors in their filing and/or responses, please provide an update as soon as reasonable that identifies such errors and provide the document(s) to support any changes.

WHEREFORE, KYSEIA respectfully submits its Supplemental Request for Information to KU and LG&E.

Respectfully submitted,

/s/ David E. Spenard

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NOTICE AND CERTIFICATION FOR FILING

Undersigned counsel provides notices that the electronic version of the paper has been submitted to the Commission by uploading it using the Commission's E-Filing System on this 31st day of July 2025. Pursuant to the Commission's July 22, 2021 Order in Case No. 2020-00085 (Electronic Emergency Docket Related to the Novel Coronavirus COVID-19), the paper, in paper medium, is not required to be filed.

/s/ David E. Spenard

NOTICE CONCERNING SERVICE

The Commission has not yet excused any party from electronic filing procedures for this case.

/s/ David E. Spenard

KYSEIA's Supplemental Request for Information to KU and LG&E
Case Numbers: 2025-00113 and 2025-00114

1. Reference: Companies' Response to KYSEIA's Initial Request for Information, Question 2 ("Response to KYSEIA 1-__").

   a. Please provide off-system sales quantities in MWh in 8,760-hour format for each of the Companies' generating resources during the most recent year and as forecast in the test year in spreadsheet format with all formulas and links intact.

   b. Please provide quantities of purchase power used to serve native load in MWh in 8,760-hour format for each of the Companies' generating resources during each calendar year since and including 2020 in spreadsheet format with all formulas and links intact.

2. Reference: Application, Direct Testimony of Charles R. Schram ("Schram Direct"), page 33, lines 13-21, and Section 2 of Exhibit CRS-6. Please explain fully which variable operations and maintenance costs (e.g., costs associated with the repair, overhaul, replacement, or inspection of a resource, as well as consumables other than those already identified) are included in avoided energy costs. If not, please explain fully why not.

3. Reference: Schram Direct, Exhibit CRS-6, page 11 of 14, Response to KYSEIA 1-5, and Response to KYSEIA 1-21(c) and (d).

   a. Please provide all studies or other documentation in which the Companies have examined the potential reliability impacts of 1,000 MW or more of QFs by QF type?

   b. Please explain why the Companies expectation for new data center load of between 1,750 MW and 6,000 MW is not reflected in workpapers previously provided in Exhibit CRS-7 at the file path \CSR_QF_NMS\ PLEXOS\Results\20250312_2025QF_PlexosResults.xlsm on worksheet "USE-dump" in the column labeled "Planning Peak Load (MW)", which shows a declining peak load over the analysis years.

4. Reference: Response to KYSEIA 1-7.

   a. Please define and explain what is meant by "energy cost perspective."

   b. Please explain all differences in modeling assumptions and resource configurations for the 815 MW of solar that was selected in the 2025 CPCN Resource Plan in high gas price scenarios and the 80 MW of QF solar whose addition appears to have no impact on the selected solar quantity.

5. Reference: Response to KYSEIA 1-11(d), Attachment, which appears to show distribution circuit level loads at the times of the 2023 and 2024 system-wide peak load (HE 15 on 8/23/2023 and HE 15 on 8/28/2024).

    a. Please provide, in spreadsheet format, the date, time (hour ending format) and quantity of maximum annual non-coincident peak demand for each individual substation and distribution feeder on the Companies' systems for each of calendar years 2023 and 2024. Please include a column in your response identifying whether the circuit or substation is an LGE facility or a KU facility.

    b. Please provide the data shown in "04-2025_KSIA_DR1_KU_Attach_to_Q11(d).pdf" in spreadsheet format.

6. Reference: Application, Direct Testimony of Peter W. Waldrab ("Waldrab Direct"), Exhibit PWW-3 at Page 1 of 5 which states, "For the LG&E case, meter data was collected from 47 residential meters on the WO1184 circuit, which feeds the Norton Commons community. Similarly, for the KU case, meter data was collected from 21 residential meters on the 777-0431 circuit, which feeds the Rocky Creek Reserve community."

    a. Please provide the total number of residential meters on the WO1184 circuit.

    b. Please provide the total number of residential meters on the 777-0431 circuit.

    c. Please provide the margin of error, confidence level, and other metrics related to the statistical validity of the sample sizes used.

7. Reference: Waldrab Direct, Exhibit PWW-3 at Page 2 of 5, Figure 2. Please provide all PV Watts input values for the output results depicted.

8. Reference: Response to KYSEIA 1-13(b). Please define "maximum export potential" and explain how this metric is determined.

9. Reference: Response to KYSEIA 1-12(c), which states, "a clipped production profile was chosen to maximize the capacity factor for the solar production resulting in the best-case output for solar."

    a. Please confirm that a "clipped" production profile reduces the total kWh delivered to the grid.

    b. Please explain fully how a "clipped" production profile maximizes the capacity factor of solar production and provide an example if possible.

10. Reference: Response to KYSEIA 1-15 and Schram Direct, page 9, lines 13-15.

a. Please explain whether the cumulative generating capacity of net metering systems used by the Companies to calculate the 1% threshold is based on nameplate capacity, AC or DC inverter capacity, actual net metering exports in the single-hour of peak load, estimated net metering output (including both behind the meter and exported output), or some other methodology.

b. Please provide the MWh quantity of total net metering exports at the time of each company's single-hour peak load during 2024 and in all hours as forecasted for the test year.

11. Reference: Schram Direct, Exhibit CRS-6, page 3 of 14, stating, "To focus the analysis on the cost of the Companies' resources serving native load, market electricity purchases and off-system sales were not permitted in PROSYM."

a. Please explain if off-system sales provide financial or other benefits to ratepayers.

b. Please explain the mechanism by which ratepayers benefit financially or otherwise from off-system sales.

c. Please provide an example of how off-system sales impact retail rates.

12. Reference: Schram Direct, page 35, lines 7 through 11 that state: "Because the Companies are transitioning from lower economic minimum reserve margins to higher minimum reserve margins developed to reduce the loss of load expectations to one day in ten years, the capacity need is assumed to be immediate, in 2026."

a. Please explain what resources the Companies will use to fill the immediate capacity need in 2026.

b. Please provide the cost of the resources the Companies will use to fill the immediate capacity need in 2026.

c. Additional Reference: Schram Direct, Exhibit CRS-6, Page 6 of 14. Please explain why modeling results shown in Table 5 only include years starting in 2030.

d. Please explain what resources the Companies will use to fill the capacity need in years 2027-2029.

e. Please provide the cost of the resources the Companies will use to fill the capacity need in 2027-2029.

13. Reference: Waldrab Direct, Exhibit PWW-3 at pages 1-3.

a. Please provide the number, model (if known), and load of electric vehicle chargers installed in the Companies' service territories since 2020, including a breakout by customer class.

b. Please provide the number of residential customer accounts that have upgraded their electric service capability, including those that required transformer upgrades, and the upgrade quantity, since 2020.

c. Please provide the number of new service accounts for newly constructed facilities served by existing substations and distribution feeders since 2020, by company and by customer class.

14. Reference: Schram Direct, Exhibit CRS-1, Exhibit CRS-2, Exhibit CRS-3, and Exhibit CRS-4. Please provide, in spreadsheet format with all formulas and links intact, the data in the identified Exhibits.