

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matters of:

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

AND

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

**KENTUCKY SOLAR INDUSTRIES ASSOCIATION, INC.
2ND 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 August 27, 2025, respectfully tenders its 2nd 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 requests 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 2nd 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 12th day of September 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 2nd Supplemental Request for Information to KU and LG&E
Case Numbers: 2025-00113 and 2025-00114

1. Please state responses to the following:
 - a. When QFs or Rider NMS-2 customers seek to interconnect with the Companies' power grid, which system components (e.g., PV array, inverter, etc.) do the Companies collect data about?
 - b. What data are collected and in what units are the data collected for each system component?
 - c. Provide an example of the form used by these interconnecting customers to provide the Companies with information about the interconnecting system.
2. Reference: Application, Direct Testimony of Charles R. Schram ("Schram Direct"), page 9, lines 13-15. Please provide the formula used to calculate an individual net metered systems' contribution to the one percent (1%) cap.
3. Reference: Schram Direct, page 10, lines 13-16. Please explain why the Companies did not consider the 2.48 MW of battery capacity in its various analyses regarding distributed solar and net metering compensation.
4. Please explain whether, and if applicable how, the Companies' proposed methodology for calculating net metering generating capacity in relation to the one percent (1%) threshold will be revised or otherwise altered in response to the United States Court of Appeals for the District of Columbia Circuit's September 9, 2025, Opinion on remand from the Supreme Court of the United States in *Solar Energy Industries Association v. Federal Energy Regulatory Commission* (Case No. 21-1126).
<https://media.cadc.uscourts.gov/opinions/docs/2025/09/21-1126-2134022.pdf>. If the Companies do not plan to revise or otherwise alter their methodology, explain why not. (Please note that the request does not seek the provision of information covered by the attorney client privilege.)
5. Reference: Schram Direct, page 33, lines 13-21 and Section 2 of Exhibit CRS-6. Also refer to the Companies' Response to KYSEIA Supplemental Request for Information at Q-2, and Direct Testimony of Timothy S. Lyons, Exhibit TSL-3, page 384.
 - a. Please explain why the Companies allocate generation maintenance expenses to energy in retail rates but exclude maintenance costs from the energy component of cost rates.

- b. Please explain if the Companies are familiar with the relationship between “equivalent operating hours” and the scheduling of required maintenance activities in accordance with manufacturer recommendations. One example of this relationship is available from Siemens at <https://www.siemens-energy.com/global/en/home/products-services/service/maintenance-overhaul-service.html> under the section titled “Inspection & overhaul schedule.”