

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.
RATES AND APPROVAL OF CERTAIN	)	2025-00114
REGULATORY AND ACCOUNTING	)	
TREATMENTS	)	

**KENTUCKY SOLAR INDUSTRIES ASSOCIATION, INC.  
REQUEST FOR INFORMATION TO JOINT INTERVENORS**

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 Requests for Information to Kentuckians for the Commonwealth, Kentucky Solar Energy Society, and Metropolitan Housing Coalition (collectively, “Joint Intervenors”) 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 Joint Intervenors’ response to the appropriate Staff request will be deemed a satisfactory response.
- 2) Please identify the Joint Intervenors’ 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 Joint Intervenors receive 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 Joint Intervenors 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 Joint Intervenors, 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 Joint Intervenors 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 Request for Information to the Joint Intervenors.

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 12<sup>th</sup> 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 Request for Information to Joint Intervenors**  
**Case Number: 2025-00114**

1. Reference: James Fine Testimony, page 23, line 18 to page 24, line 1 and page 29, lines 15 through 17. Please explain if the use of ELCC is a common practice in states with which the witness is familiar.
2. Reference: James Fine Testimony, page 23, lines 3 through 6. Please elaborate on the importance of “consistency across filings” and why the lack of consistency should “raise a red flag for the Commission” in this context.
3. Reference: Roger D. Colton Testimony, page 86, line 7 through page 92, line 3.
  - a. Please elaborate and explain whether the barriers to low-income household participation in rooftop solar, electric vehicle charging, or other energy efficiency opportunities are exclusively financial barriers or whether there are separate barriers beyond purely financial considerations that could be addressed by the recommendations provided.
  - b. Please explain whether these non-financial barriers such as a utility customer lacking “the dominion interest” (at 87:4-5) are discriminatory against utility customers who face such barriers if those barriers effectively prevent these customers from participation in utility programs or tariffs that are available to other customers.