

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.  
REQUEST FOR INFORMATION TO THE ATTORNEY GENERAL  
AND KENTUCKY INDUSTRIAL UTILITIES 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 Requests for Information to the Attorney General of the Commonwealth of Kentucky, by and through the Office of Rate Intervention, and Kentucky Industrial Utilities Customers (collectively, “OAG KIUC”) 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 OAG KIUC response to the appropriate Staff request will be deemed a satisfactory response.
- 2) Please identify the OAG KIUC 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 OAG KIUC receive 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 OAG or KIUC 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 OAG KIUC 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 Attorney General and Kentucky Industrial Utilities Company.

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 OAG KIUC**  
**Case Numbers: 2025-00113 and 2025-00114**

1. Reference: Testimony of Lane Kollen (filed September 9, 2025) at page 93, lines 1-3 and at page 92, lines 15-18. Please explain whether the effect of new generation capacity that will likely provide additional energy for off-system sales and increased OSS margins is exclusive to generation capacity constructed by the Companies or whether a similar effect would be equally likely to occur as a result of new generating capacity constructed, owned, and operated by other entities.