

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.
POST-HEARING REQUESTS FOR INFORMATION**

Comes now the Kentucky Solar Industries Association, Inc. (“KYSEIA”), by and through counsel, and, in accordance with the Public Service Commission’s Orders dated November 10, 2025 respectfully tenders its Post-Hearing 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 Post-Hearing Requests for Information to KU and LG&E.

Respectfully submitted,

/s/ David E. Spenard

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NOTICE AND CERTIFICATION FOR FILING AND SERVICE

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

/s/ David E. Spenard

**KYSEIA's Post-Hearing Requests for Information to KU and LG&E
Case Numbers: 2025-00113 and 2025-00114**

1. Please supply a copy of the White Paper: Beyerle, David S.; Stewart, Noah M.; Lavin, Shaun E.; Alkire, Chad C.; Nikolic, Heather; Kelty, Samuel; Boggs, Ezekiel A.; Boyle, Declan; Holloway, Lawrence E.; and Patrick, Aron M., "The Rhythm of Renewables: Minute-by-Minute Insights from Kentucky" (2025). *Electrical and Computer Engineering Faculty Publications*. 62., listed in the Renewable Energy publications in the Innovate research portion of the PPL Corporation website at: <https://www.pplweb.com/innovation/research-and-development/academic-publications/>
2. On a company-by-company basis (Kentucky jurisdictional electric operations), provide the (a) planning reserve margin in MW and as a percentage, (b) incremental cost of firm natural gas supply and transportation delivery contracts, (c) natural gas volume and percentage of total supply for which firm supply and transportation delivery has been secured and is planned to be secured, and (c) the marginal cost in \$ per unit of capacity for the highest cost planned capacity units or purchases. If these amounts cannot be provided on a company-by-company basis, supply them for the combined Companies' Kentucky jurisdictional operations.
3. On a company-by-company basis (Kentucky jurisdictional electric operations) for the calendar years 2022, 2023, and 2024, provide the quantity and price for (a) market purchases of energy by month; (b) the market purchases of capacity by month; and (c) the market purchases of transmission by month. If these amounts cannot be provided on a company-by-company basis, supply them for the combined Companies' Kentucky jurisdictional operations.
4. Please describe and quantify the impact of the Companies' plan to not meet their full capacity requirements (i.e., projected peak load plus reserve margin) on off-system sales.
5. Regarding the Stipulation and Recommendation (as amended by the filing on November 5, 2025), please respond to the following requests.
 - a. Refer to Section 1.1 (Stay-Out Commitment), 1.2 (Stay-Out Exceptions), and Section 9.13 (Net Metering). Following the issuances of a final Order in the instant cases, do the Companies intend to (next) update their Small and Large Capacity Cogeneration and Power Production Qualifying Facilities ("QF") credit rates prior to August 1, 2028 (the end of the base-rate "stay out" term) for any reason(s) than those identified in Section 1.2(A), Section 1.2(B) (emergency rate relief), and/or Section 1.2(D) (statutory or regulatory change)? If yes, provide the anticipated date of the filing for the next QF credit rate update filing or related tariff filing for updating QF rates and the reason(s) for the filing. If no,

please reconcile this position with the Companies' stated intent to file avoided cost rates every two years.¹

- b. Refer to Section 1.1 (Stay-Out Commitment), 1.2 (Stay-Out Exceptions), and Section 9.13 (Net Metering). Please confirm that NMS-2 rates are subject to the stay-out commitment such that the NMS-2 rates proposed through the Stipulation and Recommendation (if accepted and ordered by the Commission) will stay in effect until the effective date of new rates resulting from the Companies' next base rate cases. If this cannot be confirmed, and if the Companies intend to or reserve the right to update NMS-2 rates during the stay-out term for any reason(s) other than those identified in Section 1.2(A), Section 1.2(B) (emergency rate relief), and/or Section 1.2(D) (statutory or regulatory change), please fully explain the Companies' position concerning why the NMS-2 rates are not subject to the full term of the stay-out period (through August 1, 2028) including whether the Companies intend to update such rates every two years and the reason(s) for such bi-annual updates.
- c. Refer to Section 2.3 (Summary Calculation of Electric Revenue Requirement Increases), Section 3.3 (Summary Calculation of Gas Revenue Requirement Increase), and Section 9.13 (Net Metering). Please explain why it is not necessary for the Companies to demonstrate the derivation of the NMS-2 rates agreed upon and recommended by the Companies and the parties to the Stipulation and Recommendation (as amended) in a manner similar to the Summary Calculation of Electric Revenue Requirement Increases per Section 2.3.
- d. Refer to Section 8.3 (Renewable Energy Goals). Please provide a narrative that describes the Companies' study or studies of Distributed Energy Resource Management Systems ("DERs" or "DERMS"). Provide with the response a copy of the Companies' most recent study of the implementation of DERs or DERMS by the Companies, including, if available, the methodology and results related to the evaluation of costs and benefits.
- e. Regarding DERs or DERMS, when do the Companies anticipate implementing DERs or DERMS within their Kentucky certified service territories? If the Companies have already implemented DERs or DERMS within their Kentucky certified service territories, state the date of implementation (by company) and the numbers of participants (by company).
- f. Please identify when the Companies began requiring customers to install DERs- or DERMS-compatible inverters or other equipment on customer-owned

¹ See, for example, Case No. 2020-00349, *Electronic Application of Kentucky Utilities Company for an Adjustment of its Electric Rates, a Certificate of Public Convenience and Necessity to Deploy Advanced Metering Infrastructure, Approval of Certain Regulatory and Accounting Treatments, and Establishment of a One-Year Surcredit*, Order (Ky. P.S.C. Sept. 24, 2021), page 38.

generation, and provide the quantity and percentage of customer-generators with such equipment.

- g. Do the Companies characterize their commitment to move forward with the resources approved in Case No. 2025-00045 (the most recent CPCN case) as irreversible? If the commitment for a specific resource is characterized irreversible, please identify the basis for such a characterization. If the commitment is not currently characterized as irreversible, then please state whether and, if applicable, how, the commitment for an approved resource becomes irreversible.