COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER 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
IN THE MATTER OF 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

THE UNITED STATES DEPARTMENT OF DEFENSE AND ALL OTHER FEDERAL EXECUTIVE AGENCIES' RESPONSE TO THE JOINT KENTUCKY UTILITIES COMPANY AND LOUISVILLE GAS AND ELECTRIC COMPANY FIRST SETS OF DATA REQUESTS

Data Request No. 1:

In Excel spreadsheet or other format, with all formulas, columns and rows unprotected and fully accessible, please provide all workpapers and source documents not previously provided relied upon by DoD/FEA in this matter.

Responsible Witness: Michael P. Gorman and Jessica A. York

Response:

For Mr. Gorman's and Ms. York's workpapers, please refer to DoD/FEA's response to the Public Service Commission of Kentucky's First Set of Data Requests, Data Request No. 1, in Case No. 2025-00114 and Case No. 2025-00113.

Data Request No. 2:

Other than Mr. Gorman and Ms. York, please identify any persons, including experts, whom DoD/FEA have consulted or retained with regard to evaluating the Companies' Applications in these proceedings.

Responsible Witness: Michael P. Gorman

Response:

DoD/FEA has not retained other experts for this case.

Data Request No. 3:

For each person identified in response to Request No. 2 above, please state:

- a. the subject matter of the discussions, consultations, or evaluations;
- b. the written opinions of such persons regarding the Companies' Applications;
- c. the facts to which each person relied upon; and
- d. a summary of the person's qualifications to render such discussions, consultations, or evaluations.

Responsible Witness: Michael P. Gorman

Response:

DoD/FEA has not retained other experts for this case.

Data Request No. 4:

For each person identified in response to Request No. 2 above, please identify all proceedings in all jurisdictions in which the witness or person has offered evidence, including but not limited to, pre-filed testimony, sworn statements, and live testimony or analysis. For each response, please provide the following:

- a. the jurisdiction in which the testimony, statement, or analysis was pre-filed, offered, given, or admitted into the record;
- b. the administrative agency or court in which the testimony, statement, or analysis was pre-filed, offered, admitted, or given;
- c. the date(s) the testimony, statement, or analysis was pre-filed, offered, admitted, or given;
- d. the identifying number for the case or proceedings in which the testimony, statement, or analysis was pre-filed, offered, admitted, or given; and
- e. whether the person was cross-examined.

Responsible Witness: Michael P. Gorman

Response:

DoD/FEA has not retained other experts for this case.

Data Request No. 5:

Provide copies of all electronic files in native format with formulas intact used in your analysis. This includes copies of all workpapers supporting your testimony, analyses, and conclusions.

Responsible Witness: Michael P. Gorman

Response:

Please refer to the response to Data Request No. 1.

Data Request No. 6:

Provide copies of all electronic files in native format with formulas intact used in your analysis. This includes copies of all workpapers supporting your testimony, analyses, and conclusions.

Responsible Witness: Michael P. Gorman

Response:

Please refer to the response to Data Request No. 1.

COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER 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
IN THE MATTER OF 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
STATE OF MISSOURI) OUNTY OF ST. LOUIS)	

VERIFICATION OF MICHAEL P. GORMAN

The undersigned, **Michael P. Gorman**, being duly sworn, deposes and says that he is a Managing Principal of Brubaker & Associates, Inc., and that he has personal knowledge of the matters set forth in the responses for which he is identified as the witness, and the answers contained therein are true and correct to the best of his information, knowledge and belief.

Michael P. Gorman

Jammy & Klossner Notary Public

Subscribed and sworn to before me, a Notary Public in said County and State, this 23rd day of September, 2025.

TAMMY S. KLOSSNER
Notary Public - Notary Seal
STATE OF MISSOURI
St. Charles County
My Commission Expires: Mar. 18, 2027
Commission # 15024862

COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER 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))
IN THE MATTER OF 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))
STATE OF MISSOURI) OF ST. LOUIS)	,

VERIFICATION OF JESSICA A. YORK

The undersigned, **Jessica A. York**, being duly sworn, deposes and says that she is a Principal of Brubaker & Associates, Inc., and that she has personal knowledge of the matters set forth in the responses for which she is identified as the witness, and the answers contained therein are true and correct to the best of her information, knowledge and belief.

Jussie O. Ch Jessica A. York

Subscribed and sworn to before me, a Notary Public in said County and State, this 23rd day of September, 2025.

TAMMY S. KLOSSNER
Notary Public - Notary Seal
STATE OF MISSOURI
St. Charles County
My Commission Expires: Mar. 18, 2027
Commission # 15024862

Jammy Sklossner Notary Public

Respectfully submitted,

/s/ Kyle J Smith___

Kyle J. Smith
General Attorney
U.S. Army Legal Services Agency
Environmental Law Division (JALS-ELD)
9275 Gunston Road
Fort Belvoir, VA 22060-4446
Telephone: (703) 693 -1274

Email: kyle.j.smith124.civ@army.mil

CERTIFICATE OF SERVICE

I, Kyle J Smith, representative for DoD/FEA, hereby certify that a copy of DoD/FEA's Response to the Joint Kentucky Utilities Company and Louisville Gas and Electric Company's First Set of Data Requests were served electronically on September 23, 2025, along with the Read1st Cover Letter, on the following:

Robert M. Conroy Rick E. Lovekamp Robert.conroy@lg-ku.com Rick.lovecamp@lge-ku.com

Allyson K. Sturgeon Sara V. Judd asturgeon@pplweb.com svjudd@pplweb.com

W. Duncan Crosby, III Lindsey W. Ingram, III <u>Duncan.crosby@skofirm.com</u> l.ingram@skofirm.com

Joe F. Childers
Bethany Baxter
Nathaniel T. Shoaff
joe@jchilderslaw.com
bethany@jchilderslaw.com
Nathaniel.shoaff@sierraclub.org

Randal A. Strobo David E. Spenard rstrobo@strobobarkley.com dspenard@strobobarkley.com Lawrence W. Cook
J. Michael West
Angela M. Goad
T. Toland Lacy
John G. Horne II
Larry.cook@ky.gov
Michael.west@ky.gov
Angela.goad@ky.gov
Thomas.lacy@ky.gov
John.horne@ky.gov

Michael L. Kurtz Jody Kyler Cohn <u>mkurtz@bkllawfirm.com</u> jkylercohn@bkllawfirm.com

James W. Gardner M. Todd Osterloh Rebecca C. Price jgardner@sturgillturner.com tosterloh@sturgillturner.com rprice@sturgillturner.com

Carrie H. Grundmann Steven Wing-Kern Lee cgrundmann@spilmanlaw.com slee@spilmanlaw.com

Kurt J. Boehm kboehm@bklawfirm.com

Byron L. Gary Tom FitzGerald Ashley Wilmes byron@kyrc.org FitzKRC@aol.com Ashley@kyrc.org M. Todd Osterloh
James W. Gardner
Rebecca C. Price
Paul Werner
Hannah Wigger
jgardner@sturgillturner.com
tosterloh@sturgillturner.com
pwerner@sheppardmullin.com
hwigger@sheppardmullin.com

/s/ Kyle J Smith