

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matters of:

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

-and-

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

**JOINT RESPONSES OF ATTORNEY GENERAL AND KIUC TO DATA  
REQUESTS OF LOUISVILLE GAS & ELECTRIC CO.  
AND KENTUCKY UTILITIES COMPANY**

The intervenors, the Attorney General of the Commonwealth of Kentucky, through his Office of Rate Intervention (“OAG”), and the Kentucky Industrial Utility Customers, Inc. (“KIUC”) hereby submit their Joint Responses to Data Requests of Louisville Gas & Electric Co. (“LG&E”) and Kentucky Utilities Co. (“KU”) in the above-styled matters.

Respectfully submitted,

RUSSELL COLEMAN  
ATTORNEY GENERAL



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**Certificate of Service and Filing**

Pursuant to the Commission's Orders in Case No. 2020-00085, and in accord with all other applicable law, Counsel certifies that an electronic copy of the forgoing was served and filed by e-mail to the parties of record. Counsel further certifies that the responses set forth herein are true and accurate to the best of their knowledge, information, and belief formed after a reasonable inquiry.

This 16<sup>th</sup> day of September, 2025



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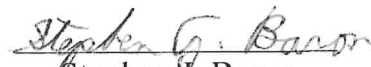
Assistant Attorney General

# AFFIDAVIT


STATE OF GEORGIA )

COUNTY OF FULTON )

STEPHEN J. BARON, being duly sworn, deposes and states: that the attached are his sworn responses and that the statements contained are true and correct to the best of his knowledge, information and belief.

  
Stephen J. Baron

Sworn to and subscribed before me on this  
16<sup>th</sup> day of September 2025.

  
Notary Public

Jessica K Inman  
NOTARY PUBLIC  
Cherokee County, GEORGIA  
My Commission Expires 07/31/2027

**AFFIDAVIT**

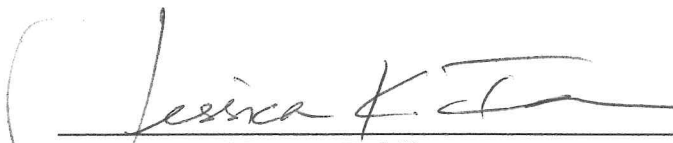
STATE OF GEORGIA            )

COUNTY OF FULTON         )

RICHARD A. BAUDINO, being duly sworn, deposes and states: that the attached is his sworn testimony and that the statements contained are true and correct to the best of his knowledge, information and belief.

  
Richard A. Baudino

Sworn to and subscribed before me on this  
16th day of September 2025.

  
\_\_\_\_\_  
Notary Public

Jessica K Inman  
NOTARY PUBLIC  
Cherokee County, GEORGIA  
My Commission Expires 07/31/2027

# AFFIDAVIT

STATE OF GEORGIA            )

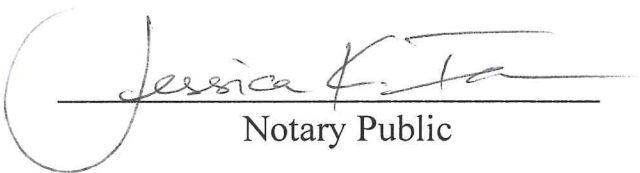
COUNTY OF FULTON        )

LANE KOLLEN, being duly sworn, deposes and states: that the attached are his sworn responses and that the statements contained are true and correct to the best of his knowledge, information and belief.



Lane Kollen

Sworn to and subscribed before me on this  
16th day of September 2025.



Notary Public


Jessica K Inman  
NOTARY PUBLIC  
Cherokee County, GEORGIA  
My Commission Expires 07/31/2027

# AFFIDAVIT

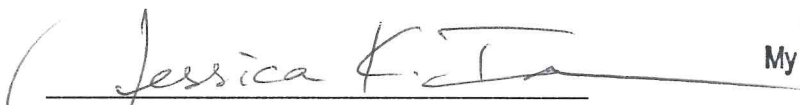
STATE OF GEORGIA )

COUNTY OF FULTON )

RANDY A. FUTRAL, being duly sworn, deposes and states: that the attached are his sworn responses and that the statements contained are true and correct to the best of his knowledge, information and belief.

  
\_\_\_\_\_  
Randy A. Futral

Sworn to and subscribed before me on this  
16th day of September 2025.

  
\_\_\_\_\_  
Notary Public

Jessica K Inman  
NOTARY PUBLIC  
Cherokee County, GEORGIA  
My Commission Expires 07/31/2027

WITNESS / RESPONDENT RESPONSIBLE:  
ALL WITNESSES

QUESTION No. 1  
Page 1 of 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 AG-KIUC in this matter.

RESPONSE:

Mr. Baudino's workpapers are being provided on this same date in response to Staff data requests.

Mr. Baron's workpapers are in the attached Public and Confidential ZIP files.

Mr. Kollen's and Mr. Futral's workpapers were provided with the upload of Mr. Kollen's direct testimony on September 9, 2025.

WITNESS / RESPONDENT RESPONSIBLE:  
RICHARD A. BAUDINO

QUESTION No. 2  
Page 1 of 1

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.

RESPONSE:

All workpapers are being uploaded on this same date in response to Staff data requests.



WITNESS / RESPONDENT RESPONSIBLE:  
RANDY A. FUTRAL

QUESTION No. 3  
Page 1 of 1

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.

RESPONSE:

See response to Question No. 1. All Mr. Futral's workpapers were provided with the upload of Mr. Kollen's direct testimony on September 9, 2025.

WITNESS / RESPONDENT RESPONSIBLE:  
RANDY A. FUTRAL

QUESTION No. 4  
Page 1 of 1

Mr. Futral provides recommended disallowance or reductions based on the Companies' requested increases from base year amounts to forecasted test year amounts. Those recommendations are itemized at Table 1 on page 9 of his testimony. Please provide the total revenue requirement he recommends for the forecasted test period and the increase in revenue requirement he recommends for the forecasted test period. Provide these recommendations in table format and for KU, LGEE, and LGEG.

RESPONSE:

Refer to the Summary Table of AG-KIUC adjustments to the Companies' requests for KU, LGEE, and LGEG contained in the Direct Testimony of Mr. Kollen at page 6. Each of the revenue requirement adjustments recommended by Mr. Futral are included in this table with the designation of "Futral" as the AG-KIUC witness in the far right hand column. This table combines the recommended reductions in expenses times the expense gross-up factor to determine the revenue requirement adjustment amounts. These calculations are performed in the summary tabs of the revenue requirement electronic workpaper files for each Company that were provided with the upload of Mr. Kollen's direct testimony on September 9, 2025. Table 1 on page 9 of Mr. Futral's testimony only shows changes to the amounts of certain expenses between the base year and test year and is not indicative of the recommendation amounts contained in his testimony.

WITNESS / RESPONDENT RESPONSIBLE:  
RANDY A. FUTRAL

QUESTION No. 5  
Page 1 of 1

See Mr. Futral's recommendation to disallow Long-Term Incentive Plan expense for the forecasted test year at pp. 24-29 of his testimony. Please also see Tab 60 to the Companies' Applications in this case entitled "2025 General Rate Case Remuneration Study." State whether Mr. Futral agrees or disagrees with the following statements in that study, and, if he disagrees, please provide all reasons, support, and documentation for that disagreement:

- i. At page 1: "LG&E and KU's strategy to provide short term and long term at risk compensation is consistent with the majority of the publicly traded utility peers examined. Overall, we find the Company's short-term and long-term at-risk compensation program designs to be comparable to the designs of utility peers."
- ii. At page 1: "Summary Conclusion: Based upon our review, we find LG&E and KU's overall compensation and benefit levels are within the range of market competitiveness and the short-term and long-term at-risk compensation program designs are aligned with market practices, based on the multiple market perspectives we examined."
- iii. At page 7: "Award Mix: LG&E and KU grants long-term at-risk awards with the mix of 80% weighted to PSUs and 20% to RSUs for executives and 100% RSUs for participants below the executive level which is consistent with what we observe in the market."

RESPONSE:

Mr. Futral has no reason to disagree with the statements referenced that are contained in the 2025 General Rate Case Renumeration Study at tab 60. The question is not whether the stock-based long-term incentive plans are comparable to similar plans of utility peers, but whether ratepayers should be held responsible for the costs associated with them.

WITNESS / RESPONDENT RESPONSIBLE  
STEPHEN J. BARON

QUESTION No. 6  
Page 1 of 1

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.

RESPONSE:

See response to Question No. 1.

WITNESS / RESPONDENT RESPONSIBLE  
STEPHEN J. BARON

QUESTION No. 7  
Page 1 of 1

Refer to Mr. Baron's testimony, page 51. Explain how the recommended \$2.50/kW-month increases in the CSR-1 and CSR-2 credits and the non-compliance penalty were calculated. Provide all workpapers and source documents related to this request not previously provided in response to Question No. 1.

RESPONSE:

Mr. Baron's recommended \$2.50/kW-month increase in the CSR-1, CSR-2 and non-compliance penalty is based on Mr. Baron's assessment of a reasonable mitigated increase and an increase consistent with gradualism. While an increase in excess of \$7/kW-month could be justified based on Mr. Baron's avoided cost analysis, in recognition of gradualism, Mr. Baron has determined that a \$2.50/kW-month would be reasonable. There are no workpapers supporting the \$2.50/kW-month recommendation since it is a judgmental recommendation.

WITNESS / RESPONDENT RESPONSIBLE  
LANE KOLLEN

QUESTION No. 8  
Page 1 of 1

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.

RESPONSE:

All workpapers were provided with the upload of Mr. Kollen's direct testimony on September 9, 2025.