COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matters 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

-and-

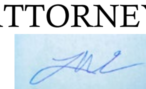
ELECTRONIC APPLICATION OF LOUISVILLE GAS & ELECTRIC COMPANY FOR AN ADJUSTMENT OF ITS ELECTRIC AND GAS RATES AND APPROVAL OF CERTAIN REGULATORY AND ACCOUNTING TREATMENTS	))))	CASE No. 2025-00114

JOINT RESPONSES OF ATTORNEY GENERAL AND KIUC TO STAFF'S POST-HEARING DATA REQUESTS

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 Post-Hearing Data Requests of the Kentucky Public Service Commission Staff in the above-styled matters.

Respectfully submitted,

RUSSELL COLEMAN
ATTORNEY GENERAL



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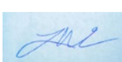
Certificate of Service and Filing

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 25th day of November, 2025



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Assistant Attorney General

WITNESS / RESPONDENT RESPONSIBLE:
LEAH WELLBORN

QUESTION No. 1
Page 1 of 1

Refer to the Hearing Testimony of Leah Wellborn (Wellborn Hearing Testimony). Explain whether the 6 Coincident Peak methodology results in a lower allocation of costs to residential ratepayers as compared to the 12 Coincident Peak methodology. Identify and explain any distinction between both Kentucky Utilities Company (KU) and Louisville Gas & Electric (LG&E) in the response.

RESPONSE:

Looking at the various methodologies used for allocating costs to residential customers, the following table provides a side-by-side comparison of the 12 CP and 6 CP allocations for KU and LG&E. [1]

Residential	6 CP	12 CP
KU	47.5%	42.1%
LG&E	47.4%	44.2%

The 6 CP allocation does not result in a lower allocation than the 12 CP methodology for residential customers, as shown in the table above. I understand that the proposed stipulation provides a rate increase for residential customers based on the system average increase, and not specifically rely on a 12 CP or 6 CP allocation methodology. [2]

[1] Companies Response to PSC 1-54.
[2] Stipulation section 5.3.

WITNESS / RESPONDENT RESPONSIBLE:
LEAH WELLBORN

QUESTION No. 2
Page 1 of 1

Refer to the Wellborn Hearing Testimony. Explain whether the 6 Coincident Peak methodology is more reasonable for both utilities as compared the 12 coincident Peak methodology given the differences in LG&E's and KU's system peaking periods.

RESPONSE:

The 6 CP methodology reflects the seasonal peaks for both Companies, which correspond to the months of need that drive new resource decisions. For both utilities and the combined utilities, the peak summer month is August and the peak winter month is January, which are the driving months for resource additions. When taking the Companies together, the August and January months remain the peak summer and winter peak respectively, but the diversity in the systems mitigate LGE's longer summer peak period and KU's longer winter peak period.

For KU, the 6 CP allocator includes the 3 summer months of July – September and 3 winter months of December – February, reflects its load shape as a winter peaking utility, but not to the fullest extent that could be justified by taking the highest 6 peak months of the year (4 winter and 2 summer).

For LG&E, the 6 CP allocator includes 4 summer months of June – September and 2 winter months of January and February, reflecting its load shape as a summer peaking utility, but not the fullest extent that could be justified by taking the highest 6 peak months of the year (5 summer and 1 winter).

A 12 CP allocation could be a reasonable alternative, but to the extent the Companies are seeking to align allocation to planning, the 6 CP allocation with summer and winter peak months better reflects the peaks that contribute to new resource additions.

WITNESS / RESPONDENT RESPONSIBLE:
LEAH WELLBORN

QUESTION No. 3
Page 1 of 1

Refer to the Wellborn Hearing Testimony. Identify and explain which customer rate class(es) a 6 Coincident Peak methodology would benefit as compared to a 12 Coincident Peak methodology.

RESPONSE:

For LG&E: Based on the Company's responses to PSC 1-54, specifically the file; "2025 PSC DR1 LGE Attach to Q54 - LGE Demand Data.xlsx" Tab: "Demand Allocators" the following provides a comparison of the derived demand allocators, with a column to compare by class which classes see a benefit under the 6 CP allocation compared to the 12 CP.

Demand Allocators					
LGE	**6CP**	**%**	**12CP**	**%**	**6CP BENEFIT**
Total	**2,183,969**	**100.0%**	**1,929,524**	**100.0%**	**TO 12 CP**
RS	1,034,804	47.4%	852,062	44.2%	FALSE
GS	249,941	11.4%	226,376	11.7%	TRUE
PS-Secondary	246,658	11.3%	231,097	12.0%	TRUE
PS-Primary	10,202	0.5%	9,685	0.5%	TRUE
TOD-Secondary	234,629	10.7%	224,005	11.6%	TRUE
TOD-Primary	261,231	12.0%	246,531	12.8%	TRUE
RTS - Transmission	133,609	6.1%	125,761	6.5%	TRUE
SCC	8,643	0.4%	7,857	0.4%	TRUE
LS & RLS	3,607	0.2%	5,410	0.3%	TRUE
LE	194	0.0%	291	0.0%	TRUE
TE	387	0.0%	387	0.0%	TRUE
OSL	8	0.0%	10	0.0%	TRUE
EV	56	0.0%	53	0.0%	TRUE

For KU: Based on the Company's responses to PSC 1-54, specifically the file, "2025 PSC DR1 KU Attach to Q54 - KU Demand Data - Redacted.xlsx" Tab: "Demand Allocators" the following provides a comparison of the derived demand allocators, with a column to compare by class which classes see a benefit under the 6 CP allocation compared to the 12 CP.

Demand Allocators					
KU	**6CP**	**%**	**12CP**	**%**	**6CP BENEFIT**
Total	**3,419,472**	**100.0%**	**3,156,223**	**100.0%**	**TO 12 CP**
RS	1,623,518	47%	1,328,975	42%	FALSE
GS	345,214	10%	353,557	11%	TRUE
AES	24,443	1%	24,220	1%	TRUE
PS-Secondary	271,106	8%	279,395	9%	TRUE
PS-Primary	15,417	0%	14,717	0%	TRUE
TOD-Secondary	290,563	8%	309,548	10%	TRUE
TOD-Primary	529,093	15%	527,535	17%	TRUE
RTS - Transmission	228,508	7%	229,450	7%	TRUE
FLS - Transmission	76,816	2%	78,848	2%	TRUE
LS & RLS	13,849	0%	9,233	0%	FALSE
LE	600	0%	400	0%	FALSE
TE	248	0%	248	0%	TRUE
OSL	53	0%	54	0%	TRUE
EV	44	0%	43	0%	TRUE

AFFIDAVIT

STATE OF GEORGIA)

COUNTY OF FULTON)

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

Leah J. Wellborn

Leah J. Wellborn

Sworn to and subscribed before me on this 25th day of November 2025.

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

Jessica K Inman

Notary Public