

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

In the Matter of:

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

**JOINT DATA REQUESTS OF
KENTUCKY UTILITIES COMPANY AND
LOUISVILLE GAS AND ELECTRIC COMPANY
PROPOUNDED TO THE ATTORNEY GENERAL
OF THE COMMONWEALTH OF KENTUCKY AND
KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC.**

Kentucky Utilities Company (“KU”) and Louisville Gas and Electric Company (“LG&E”) (collectively, “the Companies”) respectfully submit the following data requests to the Attorney General of the Commonwealth of Kentucky, through his Office of Rate Intervention (“AG”) and Kentucky Industrial Utility Customers, Inc. (“KIUC”) (collectively, “AG-KIUC”) to be answered by the date specified in the procedural schedule established by the Kentucky Public Service Commission (“Commission”) in this matter on June 18, 2025

Instructions

1. As used herein, “Documents” include all correspondence, memoranda, notes, email, maps, drawings, surveys or other written or recorded materials, whether external or internal,

of every kind or description in the possession of, or accessible to, AG-KIUC, its witnesses, or its counsel.

2. Please identify by name, title, position, and responsibility the person or persons answering each of these data requests.

3. These requests shall be deemed continuing so as to require further and supplemental responses if AG-KIUC receives or generates additional information within the scope of these requests between the time of the response and the time of any hearing conducted herein.

4. To the extent that the specific document, work paper, or information as requested does not exist, but a similar document, work paper, or information does exist, provide the similar document, work paper, or information.

5. To the extent that any request may be answered by a computer printout, spreadsheet, or other form of electronic media, please identify each variable contained in the document or file that would not be self-evident to a person not familiar with the document or file.

6. If AG-KIUC objects to any request on the ground that the requested information is proprietary in nature, or for any other reason, please notify the undersigned counsel as soon as possible.

7. For any document withheld on the ground of privilege, state the following: date; author; addressee; indicated or blind copies; all persons to whom distributed, shown or explained; and the nature and legal basis for the privilege asserted.

8. In the event any document requested has been destroyed or transferred beyond the control of AG-KIUC, its counsel, or its witnesses, 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 such a

document was destroyed or transferred by reason of a document retention policy, describe in detail the document retention policy.

9. If a document responsive to a request is a matter of public record, please produce a copy of the document rather than a reference to the record where the document is located.

Data Requests

General: All Witnesses

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.

Witness: Richard A. Baudino

2. 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.

Witness: Randy A. Futral

3. 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.

4. 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.

5. 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.”

Witness: Stephen J. Baron

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.

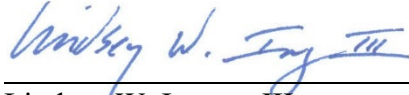
7. Refer to Mr. Baron’s testimony, page 51. Explain how the recommended \$2.50/kW-month increases in the CSR-1 and CSR-2 credits and the non-compliance penalty were calculated. Provide all workpapers and source documents related to this request not previously provided in response to Question No. 1.

Witness: Lane Kollen

8. 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.

Dated: September 12, 2025

Respectfully submitted,



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*Counsel for Louisville Gas and Electric Company
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CERTIFICATE OF SERVICE

In accordance with the Commission's Order of July 22, 2021 in Case No. 2020-00085 (Electronic Emergency Docket Related to the Novel Coronavirus COVID-19), this is to certify that the electronic filing has been transmitted to the Commission on September 12, 2025, and that there are currently no parties in this proceeding that the Commission has excused from participation by electronic means.

A handwritten signature in blue ink, appearing to read "Wendy W. Fong".

*Counsel for Kentucky Utilities Company and
Louisville Gas and Electric Company*