

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 JOINT INTERVENORS - MOUNTAIN ASSOCIATION,
METROPOLITAN HOUSING COALITION, KENTUCKIANS FOR THE
COMMONWEALTH AND KENTUCKY SOLAR ENERGY SOCIETY**

Kentucky Utilities Company (“KU”) and Louisville Gas and Electric Company (“LG&E”) (collectively, “the Companies”) respectfully submit the following data requests to the Joint Intervenors – Mountain Association, Metropolitan Housing Coalition, Kentuckians for the Commonwealth, and Kentucky Solar Energy Society (“Joint Intervenors”) 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, Joint Intervenors, 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 Joint Intervenors receive or generate 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 Joint Intervenors object 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 Joint Intervenors, 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 Joint Intervenors in this matter.

2. Other than Mr. Colton and Mr. Fine, please identify any persons, including experts, whom Joint Intervenors have consulted or retained with regard to evaluating the Companies' Applications in these proceedings.

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.

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 proceeding in which the testimony, statement, or analysis was pre-filed, offered, admitted, or given; and
- e. whether the person was cross-examined.

Witness: James Fine

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

6. See Mr. Fine's testimony at page 2, lines 2-3. Please provide copies of or links to all expert testimony Mr. Fine has given, including both written and oral testimony.

7. Has Mr. Fine identified any actual, particular distribution or transmission investment the Companies (a) have avoided due to Rider NMS-2 customers or (2) will be able to avoid through the end of the test year at issue in this case due to Rider NMS-2 customers? For each such particular avoided investment, please provide all the specific identifying information Mr. Fine possesses, explain in detail how he determined the investment was or will be avoided, and provide all workpapers supporting Mr. Fine's assertions.

8. See Mr. Fine's testimony at page 15, Table JF-3.

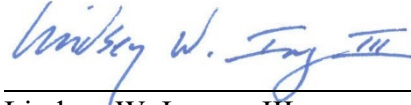
- a. Does Mr. Fine agree that, after adjusting for line losses, a kWh of energy produced by utility-scale solar provides all the same benefits as a kWh of produced by distributed solar with the exception of the transmission, distribution, and jobs benefits components shown in Table JF-3? If not, please explain it detail.
- b. Please state how much of the total avoided cost shown in Table JF-3 is avoided social (or societal) cost of carbon.

Witness: Roger D. Colton

9. 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 these proceedings that the Commission has excused from participation by electronic means.

A handwritten signature in blue ink, reading "Lindsey W. Foy III". The signature is written in a cursive style with a horizontal line extending from the end.

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