COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

RESPONSE OF
LOUISVILLE GAS AND ELECTRIC COMPANY
TO
THE ATTORNEY GENERAL AND KENTUCKY INDUSTRIAL UTILITY CUSTOMERS' POST HEARING DATA REQUESTS

DATED NOVEMBER 12, 2025

FILED: NOVEMBER 25, 2025

VERIFICATION

COMMONWEALTH OF KENTUCKY)
)
COUNTY OF JEFFERSON)

The undersigned, **Lonnie E. Bellar**, being duly sworn, deposes and says that he is Executive Vice President of Engineering, Construction and Generation for PPL Services Corporation and he provides services to Louisville Gas and Electric Company and Kentucky Utilities Company, 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.

Lonnie E. Bellar

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 20th day of November 2025.

Notary Public

Notary Public ID No. KYNP63286

My Commission Expires:

January 22, 2027

CAROLINE J. DAVISON
COMM EXPIRES 1/22/2027
NOTARY PUBLIC
ID # KYNP63286
STATE AT LARGE, KENTUCKY

VERIFICATION

COMMONWEALTH OF KENTUCKY)
)
COUNTY OF JEFFERSON)

The undersigned, **John Bevington**, being duly sworn, deposes and says that he is Senior Director – Business and Economic Development for PPL Services Corporation and he provides services to Louisville Gas and Electric Company and Kentucky Utilities Company, 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.

John Bevington

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 18th day of November 2025.

Caroline J Davison
Notary Public

Notary Public ID No. KYNP63286

My Commission Expires:

January 22, 2027

CAROLINE J. DAVISON
COMM EXPIRES 01/22/2027
NOTARY PUBLIC
ID # KYNP63286
STATE AT LARGE, KENTUCKY

VERIFICATION

COMMONWEALTH OF KENTUCKY)

COUNTY OF JEFFERSON)

The undersigned, **Chad E. Clements**, being duly sworn, deposes and says that he is the Director – Regulated Utility Tax for PPL Services Corporation and currently provides tax related services to Louisville Gas and Electric Company and Kentucky Utilities Company, that he has personal knowledge of the matters set forth in the responses for which he is identified as a witness, and that the answers contained therein are true and correct to the best of his information, knowledge, and belief.

Chad E. Clements

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 18th day of November 2025.

Caroline J. Davison
Notary Public

Notary Public ID No. KYNP63286

My Commission Expires:

January 22, 2027

CAROLINE J. DAVISON
COMM EXPIRES 01/22/2027
NOTARY PUBLIC
ID # KYNP63286
STATE AT LARGE, KENTUCKY

VERIFICATION

COMMONWEALTH OF KENTUCKY	)
	)
COUNTY OF JEFFERSON	)

The undersigned, **Robert M. Conroy**, being duly sworn, deposes and says that he is Vice President, State Regulation and Rates, for Kentucky Utilities Company and Louisville Gas and Electric Company and an employee of LG&E and KU Services Company, 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.

Robert M. Conroy

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 21st day of November 2025.

Notary Public

Notary Public ID No. KYNP61560

My Commission Expires:

November 9, 2026

TAMMY J. ELZY
COMM EXPIRES 11/09/2026
NOTARY PUBLIC
ID # KYNP61560
STATE AT LARGE, KENTUCKY

VERIFICATION

COMMONWEALTH OF KENTUCKY)
)
COUNTY OF JEFFERSON)

The undersigned, **Christopher M. Garrett**, being duly sworn, deposes and says that he is Vice President – Financial Strategy & Chief Risk Officer for PPL Services Corporation and Vice President, Finance and Accounting, for Kentucky Utilities Company and Louisville Gas and Electric Company and he provides services to Kentucky Utilities Company and Louisville Gas and Electric Company, 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.

Christopher M. Garrett

Christopher M. Garrett

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 21st day of November 2025.

Tammy J. Elzy

Notary Public

Notary Public ID No. KYNP61560

My Commission Expires:

November 9, 2026

TAMMY J. ELZY
COMM EXPIRES 11/09/2026
NOTARY
PUBLIC
ID # KYNP61560
STATE AT LARGE, KENTUCKY

VERIFICATION

COMMONWEALTH OF KENTUCKY)
)
COUNTY OF JEFFERSON)

The undersigned, **Charles R. Schram**, being duly sworn, deposes and says that he is Vice President –Energy Supply and Analysis for Kentucky Utilities Company and Louisville Gas and Electric Company and is an employee of LG&E and KU Services Company, 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.

Charles R. Schram

Charles R. Schram

Subscribed and sworn to before me, a Notary Public in and before said County and State this 18th day of November 2025.

Jennifer Lynn Vincent

Notary Public

Notary Public ID No. KYNP32193

My Commission Expires:

06-25-2029

JENNIFER LYNN VINCENT
NOTARY PUBLIC
Commonwealth of Kentucky
Commission # KYNP32193
My Commission Expires 6/25/2029

LOUISVILLE GAS AND ELECTRIC COMPANY

Response to Attorney General and Kentucky Industrial Utility Customers' Post Hearing Data Requests Dated November 12, 2025

Case No. 2025-00114

Question No. 1

Responding Witness: Christopher M. Garrett

Q-1. Refer to the deferral accounting described in the Stipulation at Article IV Section 4.1 and 4.2 for each of the five expense categories listed below:

(A) Pension and OPEB Expense;

(B) Storm Restoration Expense;

(C) Vegetation Management Expense;

(D) De-Pancaking Expense; and

(E) Inline Inspection and Well Logging Expense.

a. For each expense category listed above from Section 4.1, provide the base rate level that will be used to determine the amounts recorded to either regulatory assets or liabilities after the end of each calendar year.

b. For each expense category listed above from Section 4.1, describe how the base rate level was determined and provide copies of all support used in that determination.

A-1.

a.

(A)

	LGEE	LGEG	LGE Total
Pension expense - updated as of 4/30/2025 [AG-KIUC 2-25(d)]	814,621	301,298	1,115,919
OPEB expense - updated as of 4/30/2025 [AG-KIUC 2-25(d)]	1,279,659	473,298	1,752,957
Total Pension and OPEB expense	2,094,279	774,597	2,868,876

(B) See the response to PSC PH-9.

(C) See the response to PSC PH-11.

(D) See the response to PSC PH-12.

(E) There are no expenses associated with Inline Inspection and Well Logging Expense included in the determination of base rates.

b.

(A) See the Supplemental response to AG-KIUC 2-25(d) for pensions filed on August 22, 2025. See attachment provided in excel format which includes a calculation similar to AG-KIUC 2-25(d) for OPEB impacts.

(B) Storm damage expenses included in the test year represent the 5-year average as provided in the response to AG-KIUC 2-39.

(C) See attachment to AG-KIUC 2-41 for the vegetation management expenses included in the test year. The stipulation agreement adjustment is referenced in PSC PH-11 and is shown as the proforma adjustment in AG-KIUC 2-41.

(D) LG&E utilized the test year amount of $10.410 million provided as an attachment to Metts rebuttal testimony (05-2025 Rebuttal Testimony KU LGE Exhibit HDM-4 Misc Transmission Expense) less the stipulated adjustment of $3.486 million for the estimated net impact of OMU's decision to join MISO. The $3.486 million represents OMU's estimated annual depancaking expenses net of OMU's annual third-party transmission revenues that will cease once OMU joins MISO.

(E) The Companies have removed all in-line inspection and well logging costs from the test year as they are seeking to defer and amortize the associated costs over the subsequent inspection life-cycle. The Companies were previously afforded capitalization treatment for first-time inspection and well logging costs as part of FERC Accounting Guidance Order AI20-3-000 and are requesting similar treatment for subsequent inspection and well logging costs via deferral accounting.

LOUISVILLE GAS AND ELECTRIC COMPANY

Response to Attorney General and Kentucky Industrial Utility Customers' Post Hearing Data Requests
Dated November 12, 2025

Case No. 2025-00114

Question No. 2

Responding Witness: Charles R. Schram

Q-2. Provide the amount of Kentucky mined coal (tonnage and $ amount) burned at Mill Creek 2 over the last five years.

A-2. During the period of January 1, 2020, to October 31, 2025, the Company purchased 14.9 million tons of Kentucky mined coal for Mill Creek Station at a cost of $703.5 million. The amount allocated to Mill Creek unit 2, based on burn, was three million tons at a cost of $145.4 million.

LOUISVILLE GAS AND ELECTRIC COMPANY

Response to Attorney General and Kentucky Industrial Utility Customers' Post Hearing Data Requests
Dated November 12, 2025

Case No. 2025-00114

Question No. 3

Responding Witness: Lonnie E. Bellar

Q-3. Describe how many employees are expected to be laid off when Mill Creek 2 is retired. What is the average total compensation per employee?

A-3. The Companies do not plan to lay off employees when Mill Creek 2 is retired.

LOUISVILLE GAS AND ELECTRIC COMPANY

Response to Attorney General and Kentucky Industrial Utility Customers' Post Hearing Data Requests
Dated November 12, 2025

Case No. 2025-00114

Question No. 4

Responding Witness: Chad E. Clements / Christopher M. Garrett

Q-4. Describe the expected decline in state and local tax revenues when Mill Creek 2 is retired.

A-4. The retirement of Mill Creek 2 when viewed on a stand-alone basis will result in a reduction of property taxes, use taxes, payroll taxes, and coal severance taxes on a state and local basis. The estimated annual reductions are approximately $350 thousand for property tax, $100 thousand for use tax, and $1.4 million for coal severance taxes (paid by coal supplier) using 2024 information. The estimated annual reduction for state and local payroll taxes is approximately $100 thousand exclusive of planned transition efforts to staff Mill Creek 5 and Mill Creek 6.

LOUISVILLE GAS AND ELECTRIC COMPANY

Response to Attorney General and Kentucky Industrial Utility Customers' Post Hearing Data Requests
Dated November 12, 2025

Case No. 2025-00114

Question No. 5

Responding Witness: Lonnie E. Bellar / John Bevington

Q-5. Describe the potential for new jobs and other economic benefits that can be expected associated with each of the generation resources currently planned to be included in the GCR (including but not limited to Mill Creek 5, Mercer Solar, Marion Solar, and Battery Storage).

A-5. The new generation resources will require incremental operations and maintenance requirements such that the Companies plan to add the following number of employees specific to each of the noted resources:

- 4 associated with Mercer Solar, Marion Solar, and the Brown BESS
- 26 associated with Mill Creek 5
- 14 associated with Brown 12
- 11 associated with Mill Creek 6

The construction of these resources, as well as periodic outages and other maintenance events, will drive additional economic benefits through the life of the assets.

In addition to the direct economic benefits and jobs created by these resources, they will also help meet the needs of existing, expanding, and new customers to drive additional economic development and job growth. As noted in the Companies' response to AG-KIUC PHDR 3 in Case No. 2025-00045, this summer Gov. Beshear highlighted Kentucky economic development of more than $6.3 billion of new investment and more than 1,000 new full-time jobs.[1] These generating resources will help ensure there is safe, reliable, and lowest reasonable cost energy available for that kind of economic development and job growth—and even more—for years to come.

[1] *See* Case No. 2025-00045, Companies' Response to AG-KIUC PHDR 3 (citing Team Kentucky, "Gov. Beshear Highlights 10-Day Economic Win Streak With Over $6.3 Billion Invested and More Than 1,000 Jobs," New Kentucky Home (Aug. 20, 2025) ("Today, Gov. Andy Beshear highlighted an economic win streak for Kentucky, with more than $6.3 billion in new investment and over 1,000 full-time jobs announced by four iconic companies in less than two weeks.").

LOUISVILLE GAS AND ELECTRIC COMPANY

Response to Attorney General and Kentucky Industrial Utility Customers' Post Hearing Data Requests
Dated November 12, 2025

Case No. 2025-00114

Question No. 6

Responding Witness: Robert M. Conroy

Q-6. Provide a comparison of KU/LG&E's electric rates and rate increases each year from 2021 to mid-2025 compared to the national average. Provide the source of the information including all links if available.

A-6. See attachments being provided in separate files. The rates shown are sourced from Edison Electric Institute's Typical Bill and Average Rates Reports published for Winter 2022, 2023, 2024, and 2025. The relevant portions of the EEI reports used in the rate comparison are provided in the attached files.