

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 AND GAS) CASE NO. 2025-00114
RATES AND APPROVAL OF CERTAIN)
REGULATORY AND ACCOUNTING)
TREATMENTS)**

**RESPONSE OF
LOUISVILLE GAS AND ELECTRIC COMPANY
TO
KENTUCKIANS FOR THE COMMONWEALTH, KENTUCKY SOLAR
ENERGY SOCIETY, AND METROPOLITAN HOUSING COALITION'S POST
HEARING REQUESTS FOR INFORMATION
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

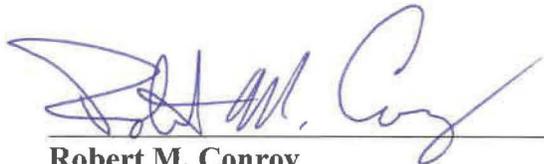
My Commission Expires:
January 22, 2027



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.

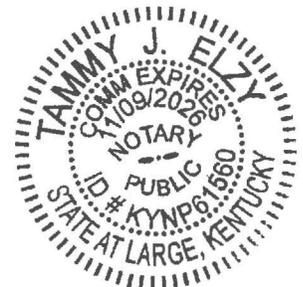


Notary Public

Notary Public ID No. KYNP61560

My Commission Expires:

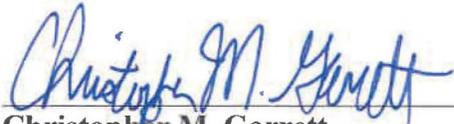
November 9, 2026



VERIFICATION

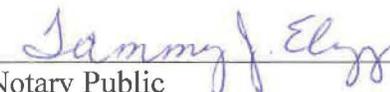
COMMONWEALTH OF KENTUCKY)
)
COUNTY OF JEFFERSON)

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

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



VERIFICATION

COMMONWEALTH OF KENTUCKY)
)
COUNTY OF JEFFERSON)

The undersigned, **Elizabeth J. McFarland**, being duly sworn, deposes and says that she is Vice President, Transmission for Kentucky Utilities Company and Louisville Gas and Electric Company and an employee of LG&E and KU Services Company, that she has personal knowledge of the matters set forth in the responses for which she is identified as the witness, and the answers contained therein are true and correct to the best of her information, knowledge, and belief.

Elizabeth J. McFarland

Elizabeth J. McFarland

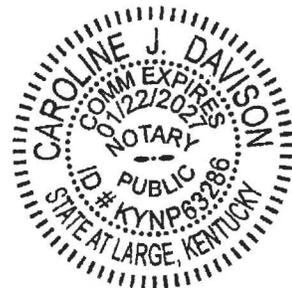
Subscribed and sworn to before me, a Notary Public in and before said County and State, this 18th day of November 2025.

Caroline J. Davison
Notary Public

Notary Public ID No. KYNP63286

My Commission Expires:

January 22, 2027



VERIFICATION

COMMONWEALTH OF KENTUCKY)
)
COUNTY OF JEFFERSON)

The undersigned, **Shannon L. Montgomery**, being duly sworn, deposes and says she is the Vice President, Customer Services for Kentucky Utilities Company and Louisville Gas and Electric Company and an employee of LG&E and KU Services Company, that she has personal knowledge of the matters set forth in the responses for which she is identified as the witness, and the answers contained therein are true and correct to the best of her information, knowledge, and belief.

Shannon Montgomery

Shannon L. Montgomery

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

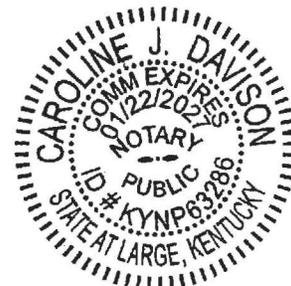
Caroline J. Davison

Notary Public

Notary Public ID No. KYNP63286

My Commission Expires:

January 22, 2027



VERIFICATION

COMMONWEALTH OF PENNSYLVANIA)
)
COUNTY OF LEHIGH)

The undersigned, Vincent T. Poplaski, being duly sworn, deposes and says that he is Vice President Total Rewards 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 foregoing response, and that the answers contained therein are true and correct to the best of his information, knowledge, and belief.

Vincent T. Poplaski
Vincent T. Poplaski (Nov 19, 2025 09:30:53 EST)
Vincent T. Poplaski

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

Commonwealth of Pennsylvania - Notary Seal
Sharon L. Fazio, Notary Public
Bucks County
My commission expires January 31, 2027
Commission number 1343431
Member, Pennsylvania Association of Notaries

Sharon L. Fazio
Notary Public

Notary Public, ID No. 1343431
(SEAL)

My Commission Expires: 1/31/2027

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



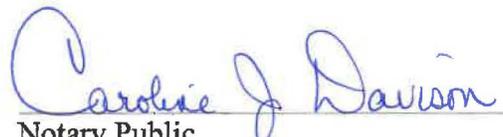
VERIFICATION

COMMONWEALTH OF KENTUCKY)
)
COUNTY OF JEFFERSON)

The undersigned, Peter W. Waldrab, being duly sworn, deposes and says that he is Vice President, Electric Distribution, 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.


Peter W. Waldrab

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


Notary Public

Notary Public ID No. KYNP63286

My Commission Expires:

January 22, 2027



LOUISVILLE GAS AND ELECTRIC COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Metropolitan Housing Coalition's Post Hearing Requests for Information**

Dated November 12, 2025

Case No. 2025-00114

Question No. 4.1

Responding Witness: Robert M. Conroy

- Q-4.1. Refer to the November 4, 2025 HVT at approximately 9:35 to 9:37 a.m.
- a. Produce the analysis referenced by Witness Conroy comparing the method of cost allocation used in the Group 1/Group 2 approach to the cost allocation methodologies that would be used in base rates.
 - b. Produce any supporting workpapers, workbooks, modeling files, or other documents used in the analysis produced in response to subpart a.
 - c. Explain what base rate cost allocation methodologies were assumed in the analysis produced in response to subpart a.
 - d. State whether the base rate cost allocation methodologies assumed in the analysis produced in response to subpart a. are the same as the methodologies that the Companies currently use in allocating base rate costs. If not, explain how they are different.
- A-4.1. Mr. Conroy's recollection at the hearing of the referenced analysis performed nearly 15 years ago was not accurate. The referenced analysis was performed subsequent to the establishment of the Group 1/Group 2 methodology in the 2011 ECR Plan proceeding (Case No. 2011-00162). As agreed to in the Settlement Agreement in that proceeding, "[E]ach utility shall address the impact of this change in revenue allocation in the next two future environmental surcharge two-year reviews or ECR compliance plan proceeding." The referenced analysis was not a comparison to base rate allocation methodologies, but a comparison of the change from allocating the ECR revenue based on total revenues to the two-step Group 1/Group 2 allocation method agreed to in the Settlement Agreement.
- a. The analysis was included in testimony provided in Case No. 2013-00243 and Case No. 2015-00222. See the attachments being provided in separate files. Attachment 1 is the Testimony and Exhibits from Case No. 2013-00243 and Attachment 2 is the Testimony and Exhibits from Case No. 2015-00222.
 - b. See the attachment being provided in a separate file for the workpapers supporting the testimony in Case No. 2015-00222. The Company has been

unable to locate any workpapers supporting the testimony provided in Case No. 2013-00243, although data from that case is included in the workpaper file being provided from Case No. 2015-00222.

- c-d. See the response above. The analysis was not based on a base rate cost allocation methodology.

LOUISVILLE GAS AND ELECTRIC COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Metropolitan Housing Coalition’s Post Hearing Requests for Information
Dated November 12, 2025**

Case No. 2025-00114

Question No. 4.2

Responding Witness: Christopher M. Garrett

Q-4.2. Refer to the November 4, 2025 HVT at approximately 3:38 p.m. Produce each analysis supporting Mr. Garrett’s belief that the Companies will underearn a 9.9% ROE, if any.

A-4.2. The statement that the Companies will underearn the 9.90% ROE was based on the capital spend projections included in the 2025 Business Plan. The analysis below shows the estimated annual regulatory lag for the projected increase in capitalization from July 2026 (midpoint of current test year) through January 2028 (midpoint of sharing mechanism reporting period).¹ This analysis utilizes the stipulated WACC which incorporates a 9.90% ROE. Importantly, the Sharing Mechanism will serve to protect customers down to a 9.40% ROE for not only this anticipated increase in capitalization, but all capitalization included in the current rate case proceeding.

\$millions

	<u>LG&E</u>
Depreciation & Amortization Recovered in Base Rates (Operating Cash Flow)	\$513
Less: Forecasted Base Capex (Investing Cash Flow)	931
Free Cash Flow	<u><u>(\$418)</u></u>
Average Capitalization Increase to Finance Negative Free Cash Flow	\$418
Grossed-up Weighted Average Cost of Capital	<u>9.25%</u>
Annual Required Return on Capitalization	39
Annual Depreciation at Stipulation Depreciation Rates	38
Annual Property Tax	<u>3</u>
Annual Revenue Requirement on Base Capital	<u><u>\$79</u></u>

Note: Reflects budgeted activity for the 19 months July 2026 (midpoint of 2026 rate case) through January 2028 (midpoint of Sharing Mechanism)

¹ The analysis focuses solely on the estimated regulatory lag associated with projected capital expenditures through the sharing mechanism reporting period less the impact of continued depreciation on capitalization. The analysis does not incorporate any potential offsetting changes in load or deferred income taxes.

LOUISVILLE GAS AND ELECTRIC COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Metropolitan Housing Coalition's Post Hearing Requests for Information
Dated November 12, 2025**

Case No. 2025-00114

Question No. 4.3

Responding Witness: Lonnie E. Bellar

- Q-4.3. Refer to Witness Bellar's Hearing Testimony, November 4, 2025 HVT beginning at approximately 4:09 p.m.
- a. Produce each press release issued by each of the Companies (e.g., PPL Corp., LG&E, KU) concerning these rate case proceedings.
 - b. Produce each press release issued by each of the Companies (e.g., PPL Corp., LG&E, KU) concerning Case No. 2025-00045.
- A-4.3.
- a. See attachments being provided in separate files.
 - b. See attachments being provided in separate files.

LOUISVILLE GAS AND ELECTRIC COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Metropolitan Housing Coalition’s Post Hearing Requests for Information
Dated November 12, 2025**

Case No. 2025-00114

Question No. 4.4

Responding Witness: Julissa Burgos

Q-4.4. Refer to Witness Crockett’s Hearing Testimony, November 5, 2025 HVT beginning at approximately 11:21 a.m.

- a. Confirm that PPL’s most-recent common stock dividend was paid October 1, 2025, at \$0.2725/share. If anything but confirmed, please state the date paid and amount of PPL’s most-recent quarterly stock dividend.
- b. Confirm each of the following PPL annual dividends. If anything but confirmed, please provide PPL’s annual dividend for each of the last three years.

Year Annual Dividend (\$/share)

2025	\$1.09
2024	\$1.03
2023	\$0.96

- c. Confirm that PPL Corp has roughly 739 million outstanding shares. If anything but confirmed, please provide a specific explanation of the number of outstanding shares over at least the last twelve months.

A-4.4.

- a. Confirmed
- b. Confirmed
- c. Confirmed. As of October 31, 2025, PPL Corporation had 739.7 million outstanding shares.

LOUISVILLE GAS AND ELECTRIC COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Metropolitan Housing Coalition's Post Hearing Requests for Information
Dated November 12, 2025**

Case No. 2025-00114

Question No. 4.5

Responding Witness: Lonnie E. Bellar

- Q-4.5. Refer to the November 5, 2025 HVT at approximately 9:18 to 9:20 a.m.
- a. Produce the "bottom-up" capital and O&M plans for Mill Creek 2 referenced by Witness Bellar that are reflected in the Companies Supplemental Testimony Exhibit 5.
 - b. Identify the date that such plans were created.
 - c. Identify the capital and O&M costs that the Companies have incurred to date to keep Mill Creek 2 open until 2031 rather than retiring the unit in 2027.
- A-4.5.
- a. See the response to PSC PH-20.
 - b. Estimates for the Mill Creek 2 extension were developed and refined since the CPCN stipulation agreement in July 2025.
 - c. See the response to SIERRA CLUB PH-3.

LOUISVILLE GAS AND ELECTRIC COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Metropolitan Housing Coalition’s Post Hearing Requests for Information
Dated November 12, 2025**

Case No. 2025-00114

Question No. 4.6

Responding Witness: Lonnie E. Bellar

Q-4.6. Refer to the November 5, 2025 HVT at approximately 9:33 to 9:35 a.m., and the Companies’ response to AG-KIUC Post-Hearing Data Request 1 in Case No. 2025-00045.

- a. Produce an updated version of the table in the referenced post-hearing data response to reflect the Companies’ most recent forecast of the costs to reliably operate Mill Creek 2 through the anticipated 2031 in-service date of Mill Creek 6.
- b. Identify the Companies’ most recent forecast of the costs of extending the life of Mill Creek 2 beyond 2031, including the costs of:
 - i. SCR installation
 - ii. incremental transmission costs
 - iii. any other notable life-extension costs

A-4.6.

a.

(\$000’s)	2025	2026	2027	2028	2029	2030	2031
Non-Labor	\$8,413	\$13,243	\$9,330	\$7,303	\$6,086	\$5,702	\$2,261
Labor	\$917	\$507	\$478	\$35	\$219	\$21	\$0
Capital	\$3,956	\$19,644	\$11,882	\$2,961	\$2,022	\$692	\$0
Total	\$13,287	\$33,394	\$21,690	\$10,298	\$8,327	\$6,415	\$2,261

These estimates do not reflect allocated Mill Creek Common costs.

Note that customers will benefit from lower fuel adjustment clause costs provided by low-cost energy from Mill Creek Unit 2, which will automatically flow through to customers. These

benefits are about \$3 million per year on average from 2028 through 2030, and they are not included in the preliminary bill analysis.²

- b. The most recent forecast is shown in Section 2.2 of Attachment 1 to the Companies' response to PSC 3-8(b) in Case No. 2025-00045.
 - i. See response to part (b).
 - ii. See response to part (b).
 - iii. See response to part (b).

² Joint Supplemental Testimony of Robert M. Conroy and Christopher M. Garrett at 14 (Oct. 31, 2025).

LOUISVILLE GAS AND ELECTRIC COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Metropolitan Housing Coalition's Post Hearing Requests for Information
Dated November 12, 2025**

Case No. 2025-00114

Question No. 4.7

Responding Witness: Vincent Poplaski

- Q-4.7. Refer to the November 5, 2025 HVT at approximately 11:25 to 11:43 a.m., Attachment 2 to Tab 60 of the Companies' Applications, and the Companies' Responses to the Commission Staff's First Request for Information number 41, as well as Commission Staff's Post-Hearing Request for Information to Kentucky Utilities Company and Commission Staff's Post-Hearing Request for Information to Louisville Gas and Electric Company number 31, and provide also the amount and value of any other forms of incentives, including stock options or forms of deferred compensation (specify) for the same period as requested by staff in the post-hearing data request (2020 through present day 2025), and by name and title, in full, for affiliates, parents, and subsidiaries for the employees listed in Attachment 2 to Tab 60 and attachment 3 to the Companies' Responses to the Commission Staff's First Request for Information number 41.
- A-4.7. See the response to PSC PHDR Question Nos. 31 and 52.

LOUISVILLE GAS AND ELECTRIC COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Metropolitan Housing Coalition's Post Hearing Requests for Information
Dated November 12, 2025**

Case No. 2025-00114

Question No. 4.8

Responding Witness: Charles R. Schram / Peter W. Waldrab

Q-4.8. Refer to the November 5, 2025 HVT at approximately 3:28 to 3:31 p.m. and provide, by Company, the:

- a. most recent two years and forecasted three years of capital costs and new capacity associated with capacity-related distribution projects;
- b. annual solar production of distributed energy systems; and
- c. annual average solar availability factor.

A-4.8.

- a. For the period 2023-2027, LGE has spent or forecasts to spend \$3.67 million on capacity driven projects. New capacity added cannot be determined as this varies by project and type of improvements associated with the project.
- b. Distributed energy systems are not separately metered. Therefore, the Companies do not have metered data to calculate the annual production of these systems. Instead, the Companies can reasonably estimate production from these systems using solar irradiance. Using this approach, the Companies estimate that LG&E distributed energy systems will produce 48,854 MWh in the forecasted test year.
- c. The Companies assume this is referring to capacity factors instead of availability factors, which the Companies do not calculate for distributed resources. As mentioned in response to part (b), the Companies do not have metered production data but can reasonably estimate capacity factors using installed capacity and estimated solar production. For the forecasted test year, the Companies estimate the average annual capacity factor of distributed energy systems to be 16.3% after adjusting for inverter losses.

As discussed by Mr. Waldrab on November 5, 2025, the Companies do not agree with the implication that annual solar production reduces the need for capacity investments on the distribution system one-for-one. For solar production, or any distributed generation connected to the distribution system,

to offset the need for infrastructure investment, output must offset peak demand at the same time that peak demand occurs and at a section of network that is capacity limited. It must also be predictable such that planners can rely on the generation to occur when needed. The average annual capacity factor is not relevant for system planning purposes. For example, if a circuit's capacity need is driven by winter peak demand occurring during hours of darkness, solar generation in April or May does not address that need.

LOUISVILLE GAS AND ELECTRIC COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Metropolitan Housing Coalition’s Post Hearing Requests for Information
Dated November 12, 2025**

Case No. 2025-00114

Question No. 4.9

Responding Witness: Elizabeth J. McFarland

Q-4.9. Refer to the November 5, 2025 HVT at approximately 4:15 to 4:16 p.m. and provide the Companies’ joint firm point-to-point transmission service rates over the most recent five years.

A-4.9. See table provided below.

Type of Service	Unit of Measure	June 1, 2025 Point to Point	June 1, 2024 Point to Point	June 1, 2023 Point to Point	June 1, 2022 Point to Point	June 1, 2021 Point to Point
Hourly Peak	\$/MWh	\$9.813	\$9.375	\$8.750	\$8.563	\$8.188
Hourly Off-Peak	\$/MWh	\$4.667	\$4.458	\$4.167	\$4.083	\$3.875
Daily Peak	\$/MW-Day	\$157.00	\$150.00	\$140.00	\$137.00	\$131.00
Daily Off-Peak	\$/MW-Day	\$112.00	\$107.00	\$100.00	\$98.00	\$93.00
Weekly	\$/MW-Week	\$786	\$752	\$702	\$684	\$653
Monthly	\$/MW-Month	\$3,405	\$3,258	\$3,042	\$2,963	\$2,830

Note: Rates shown for 2021, 2022, and 2023 reflect rates that were updated from originally filed rates due to adjustments and corrections that were made after the original filing date.

LOUISVILLE GAS AND ELECTRIC COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Metropolitan Housing Coalition's Post Hearing Requests for Information
Dated November 12, 2025**

Case No. 2025-00114

Question No. 4.10

Responding Witness: Shannon L. Montgomery

Q-4.10. Refer to the November 6, 2025 HVT at approximately 11:38 to 11:43 a.m., and respond to the following:

- a. The total number of disconnections by Company for each month for 2020 through present day 2025;
- b. The dates of any suspensions of disconnections due to Company policy; and
- c. Explain whether the Companies analyze any trends in disconnections and causation, and provide any such analysis or reasons, or otherwise explain any apparent trends.

A-4.10.

- a. See attachment being provided in a separate file.
- b. The Companies do not track the dates of suspensions of disconnections due to Company policy.
- c. The Companies have not analyzed any trends in disconnections and causation.

LOUISVILLE GAS AND ELECTRIC COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Metropolitan Housing Coalition's Post Hearing Requests for Information
Dated November 12, 2025**

Case No. 2025-00114

Question No. 4.11

Responding Witness: Shannon L. Montgomery

- Q-4.11. Refer to the November 6, 2025 HVT at approximately 11:43 a.m. Please produce the Companies' policies with regard to disconnections during periods of extreme weather.
- A-4.11. See attachment being provided in a separate file.

LOUISVILLE GAS AND ELECTRIC COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Metropolitan Housing Coalition's Post Hearing Requests for Information
Dated November 12, 2025**

Case No. 2025-00114

Question No. 4.12

Responding Witness: Shannon L. Montgomery

Q-4.12. Refer to the November 6, 2025 HVT at approximately 11:47 to 11:50 a.m.

- a. Please clarify whether disconnection of customers enrolled in prepay will be suspended during periods of extreme weather.
- b. Please confirm that a customer on Prepay who has already been disconnected will not automatically be reconnected before or during periods of extreme weather.

A-4.12.

- a. The Companies will not apply the current weather disconnection policy to Prepay customers. Prepay customers can stop service on their account simply by letting the funds run out. The Companies would not want to obligate customers to more utility charges if that is not their intension.
- b. Prepay customers will not automatically be reconnected before or during periods of extreme weather. Again, the Companies would not want to obligate customers to more utility charges if that is not their intension. However, the customer's electric service will be automatically reconnected once the customer's account has a positive balance, and they have acknowledged the Companies' safety message.

LOUISVILLE GAS AND ELECTRIC COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Metropolitan Housing Coalition's Post Hearing Requests for Information
Dated November 12, 2025**

Case No. 2025-00114

Question No. 4.13

Responding Witness: Christopher M. Garrett

- Q-4.13. Refer to the November 6, 2025 HVT at approximately 11:13 to 11:15 a.m. , and explain how a late payment in the period of July 2027, to July 2028, would impact the calculation of Kentucky-jurisdictional revenues, including if that payment remained outstanding at the end of the period for purposes of proposed Adjustment Clause SM.
- A-4.13. Late payments do not impact the calculation of revenues per se except for any fees that may apply. However, late payments (customer bills) which are ultimately written off will result in increased uncollectible expense. To the extent write-offs occur during the sharing mechanism period, uncollectible expense will increase. The extent to which uncollectible expense for the sharing mechanism period is higher or lower than the uncollectible expense included in base rates will serve to increase or decrease the Companies' earned rates of return on equity during the sharing mechanism reporting period.

LOUISVILLE GAS AND ELECTRIC COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Metropolitan Housing Coalition's Post Hearing Requests for Information
Dated November 12, 2025**

Case No. 2025-00114

Question No. 4.14

Responding Witness: Shannon L. Montgomery

Q-4.14. Refer to the Rebuttal Testimony of Shannon L. Montgomery Vice President, Customer Services on Behalf of Kentucky Utilities Company and Louisville Gas and Electric Company.

- a. Provide the communication between Kentucky Housing Corporation and the Companies referenced at page 16, lines 1-8, and any additional communications regarding the topic referenced there.
- b. Have the Companies sought to determine or quantify the funds from the Infrastructure and Investment Jobs Act distributed by KHC? If so, please provide any such quantification.

A-4.14.

- a. There was a phone call between Kentucky Housing Corporation and the Companies in July 2025.
- b. According to Kentucky Housing Corporation, they received \$52 million from IJA funds which are available through 2029. These IJA funds are in addition to the \$10 million per year formula funds. The formula funds were noted to continue through 2026.

LOUISVILLE GAS AND ELECTRIC COMPANY

**Response to Kentuckians for the Commonwealth, Kentucky Solar Energy Society,
and Metropolitan Housing Coalition’s Post Hearing Requests for Information
Dated November 12, 2025**

Case No. 2025-00114

Question No. 4.15

Responding Witness: Michael E. Hornung

Q-4.15. Refer to the Companies’ Response to Joint Intervenor Q-2.11. Please identify each column of data from the attachment that the Companies’ utilized in calculating the following:

- a. The estimated collateral amount.
- b. The estimated 15-year minimum demand charge obligation.

A-4.15. The minimum monthly bill is the sum of the BSC (Column M), and 80% of the Demand Charges (Columns N, O and P).

a.-b.

	kVA	Price	Min Bill %	Total	
Demand	402,000	\$ 18.93	80%	\$ 6,087,888	
Basic Service Charge / day		\$ 49.28		\$ 1,500	
				\$ 6,089,388	/Month
				\$ 73,072,656	12-Month Collateral
				\$ 146,145,311	24-Month Collateral
				\$ 1,096,089,833	15-Year Min Bill

See attachment being provided in a separate file. The attached spreadsheet provides an updated exhibit from Joint Intervenor Q-1.170a. that includes the formulas for the table above. See cell references AA5:AF12.