COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

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ELECTRONIC APPLICATION OF KENTUCKY)	
UTILITIES COMPANY AND LOUISVILLE GAS)	CASE NO. 2025-0019
AND ELECTRIC COMPANY FOR AN ORDER)	CASE NO. 2025-00190
APPROVING THE ESTABLISHMENT OF)	
REGULATORY ASSETS)	

RESPONSE OF
KENTUCKY UTILITIES COMPANY
AND
LOUISVILLE GAS AND ELECTRIC COMPANY
TO
THE COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
JULY 17, 2025

FILED: JULY 29, 2025

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

Notary Public Lly

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 he provides services to 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.

Christopher M. Garrett

Notary Public

Notary Public ID No. KYNP63286

My Commission Expires:

January 22, 2027

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 28th day of 2025.

Notary Public

Notary Public ID No. KYNP 63286

My Commission Expires:

January 22, 2027



Response to Commission Staff's First Request for Information July 17, 2025

Case No. 2025-00196

Question No. 1

Responding Witness: Peter W. Waldrab

- Q-1. Refer to the Application, page 4-5, paragraph 14 which states that LG&E/KU experienced nearly 1,000 reports of wires down and over 200 broken poles. State whether LG&E/KU anticipates the actual number of broken poles and downed wires to differ from the amounts reported in the application. If so, provide an updated number of downed wires and broken poles that resulted from the May 2025 Storm.
- A-1. LG&E/KU replaced 275 distribution poles and 15 transmission structures due to the May 16, 2025 Storm. There were a total of 823 LG&E/KU wire down events.

Response to Commission Staff's First Request for Information July 17, 2025

Case No. 2025-00196

Question No. 2

Responding Witness: Peter W. Waldrab

- Q-2. Refer to the Application, page 5, paragraph 15. Provide the number of off system resources that assisted in restoration efforts.
- A-2. A total of 589 off-system resources assisted with restoration efforts.

Response to Commission Staff's First Request for Information July 17, 2025

Case No. 2025-00196

Question No. 3

Responding Witness: Robert M. Conroy / Christopher M. Garrett

- Q-3. Refer to the Application, pages 7-8, paragraph 24.
 - a. Provide the amount of storm-related costs built into KU's base rates.
 - b. Provide the amount of storm-related costs built into LG&E's base rates.
 - c. Provide the amount of storm damage expenses outside of the May 2025 Storm that KU has incurred since January 1, 2025, that have not been deferred.
 - d. Provide the amount of storm damage expenses outside of the May 2025 Storm that LG&E has incurred since January 1, 2025, that have not been deferred.

A-3.

- a. The amount of storm-related costs included in the test year in Case No. 2020-00349 for KU is \$3.2 million.
- b. The amount of storm-related costs included in the test year in Case No. 2020-00350 for LG&E is \$4.6 million.
- c. For KU, the amount of storm damage operating expenses YTD through June, exclusive of the May 2025 Storm and the 2025 Winter Storm Blair (\$7.6 million), which has not been deferred is \$3.8 million.
- d. For LG&E, the amount of storm damage operating expenses YTD through June, exclusive of the May 2025 Storm and the 2025 Winter Storm Blair (\$2.2 million), which has not been deferred is \$4.1 million.

Response to Commission Staff's First Request for Information July 17, 2025

Case No. 2025-00196

Question No. 4

- Q-4. Refer to the Application, Exhibit 1. Provide support for the calculations of the Contingency amounts for both capital and Operation and Maintenance (O&M) costs in Excel spreadsheet format with all formulas, columns, and rows unprotected and fully accessible.
- A-4. See attachment being provided in separate file.

Response to Commission Staff's First Request for Information July 17, 2025

Case No. 2025-00196

Question No. 5

- Q-5. Refer to the Application Exhibit 1. Provide the estimated timeline for the actual costs of the May 2025 Storm to be processed in LG&E/KU's respective accounting books.
- A-5. The estimated timeline for the actual costs of the May 2025 Storm to be completed is in January 2026, after the December 2025 accounting close.

Response to Commission Staff's First Request for Information July 17, 2025

Case No. 2025-00196

Question No. 6

- Q-6. Provide whether LG&E/KU anticipates the Federal Emergency Management Agency (FEMA) will assist with any of the storm damage restoration costs. Provide also whether LG&E/KU anticipates assistance from insurance or other Federal or State programs.
- A-6. The Companies do not anticipate any FEMA relief. Property and casualty insurance for distribution and transmission storm damage is generally not available in commercial insurance markets. As a result, the Companies do not carry any insurance and will not receive any proceeds for this type of damage.

Response to Commission Staff's First Request for Information July 17, 2025

Case No. 2025-00196

Question No. 7

- Q-7. State how the deferral of the May 2025 Storm costs as regulatory assets impacts LG&E/KU's debt to equity ratio.
- A-7. The Companies will maintain their targeted capital structure irrespective of deferral accounting treatment.