

**COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION**

In the Matter of:

ELECTRONIC MONITORING OF LOUISVILLE
GAS & ELECTRIC COMPANY AND KENTUCKY
UTILITIES COMPANY'S MILL CREEK 6 UNIT

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) CASE NO. 2025-00313
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**INITIAL REQUESTS FOR INFORMATION OF JOINT INTERVENORS
KENTUCKIANS FOR THE COMMONWEALTH, KENTUCKY SOLAR ENERGY
SOCIETY, MOUNTAIN ASSOCIATION, AND METROPOLITAN HOUSING
COALITION TO LOUISVILLE GAS & ELECTRIC COMPANY AND KENTUCKY
UTILITIES COMPANY**

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Dated: May 22, 2026

**INITIAL REQUESTS PROPOUNDED TO LOUISVILLE GAS
& ELECTRIC COMPANY AND KENTUCKY UTILITIES
COMPANY BY JOINT INTERVENORS**

DEFINITIONS

1. "Document" means the original and all copies (regardless of origin and whether or not including additional writing thereon or attached thereto) of any memoranda, reports, books, manuals, instructions, directives, records, forms, notes, letters, or notices, in whatever form, stored or contained in or on whatever medium, including digital media.
2. "Study" means any written, recorded, transcribed, taped, filmed, or graphic matter, however produced or reproduced, either formally or informally, a particular issue or situation, in whatever detail, whether or not the consideration of the issue or situation is in a preliminary stage, and whether or not the consideration was discontinued prior to completion.
3. "Person" means any natural person, corporation, professional corporation, partnership, association, joint venture, proprietorship, firm, or the other business enterprise or legal entity.
4. A request to identify a natural person means to state his or her full name and business address, and last known position and business affiliation at the time in question.
5. A request to identify a document means to state the date or dates, author or originator, subject matter, all addressees and recipients, type of document (e.g., letter, memorandum, telegram, chart, etc.), identifying number, and its present location and custodian. If any such document was but is no longer in the Company's possession or subject to its control, state what disposition was made of it and why it was so disposed.
6. A request to identify a person other than a natural person means to state its full name, the address of its principal office, and the type of entity.
7. "And" and "or" should be considered to be both conjunctive and disjunctive, unless specifically stated otherwise.

8. "Each" and "any" should be considered to be both singular and plural, unless specifically stated otherwise.
9. Words in the past tense should be considered to include the present, and words in the present tense include the past, unless specifically stated otherwise.
10. "You" or "your" means the person whose filed testimony is the subject of these data requests and, to the extent relevant and necessary to provide full and complete answers to any request, "you" or "your" may be deemed to include any other person with information relevant to any interrogatory who is or was employed by or otherwise associated with the witness or who assisted, in any way, in the preparation of the witness' testimony.
11. "Companies" means, collectively, Kentucky Utilities Company and Louisville Gas & Electric Company, and their parents or subsidiaries, and/or any of their officers, directors, employees or agents who may have knowledge of the particular matter addressed, and affiliated companies including member cooperatives.
12. "Kentucky Utilities Company" or "KU" means Kentucky Utilities Company, and its parents or subsidiaries, and/or any of its officers, directors, employees or agents who may have knowledge of the particular matter addressed, and affiliated companies including member cooperatives.
13. "Louisville Gas & Electric Company" or "LG&E" means Louisville Gas & Electric Company, and its parents or subsidiaries, and/or any of its officers, directors, employees or agents who may have knowledge of the particular matter addressed, and affiliated companies including member cooperatives.
14. "Joint Intervenors" means Kentuckians for the Commonwealth, Kentucky Solar Energy Society, Mountain Association, and Metropolitan Housing Coalition, and Metropolitan Housing Coalition, who have been moved for the status of full intervention as joint intervenors in this matter.
15. Unless otherwise specified in each individual request the term "tariff" means the tariff as filed in this matter by LG&E and KU.
16. "Commission" or "PSC" means the Kentucky Public Service Commission, including its Commissioners, personnel, and offices.
17. ##

INSTRUCTIONS

1. If any matter is evidenced by, referenced to, reflected by, represented by, or recorded in any document, please identify and produce for discovery and inspection each such document.
2. These requests for information are continuing in nature, and information which the responding party later becomes aware of, or has access to, and which is responsive to any request is to be made available to Joint Intervenors. Any studies, documents, or other subject matter not yet completed that will be relied upon during the course of this case should be so identified and provided as soon as they are completed. The Respondent is obliged to change, supplement and correct all answers to interrogatories to conform to available information, including such information as it first becomes available to the Respondent after the answers hereto are served.
3. Unless otherwise expressly provided, each data request should be construed independently and not with reference to any other interrogatory herein for purpose of limitation.
4. The answers provided should first restate the question asked and also identify the person(s) supplying the information.
5. Please answer each designated part of each information request separately. If you do not have complete information with respect to any interrogatory, so state and give as much information as you do have with respect to the matter inquired about and identify each person whom you believe may have additional information with respect thereto.
6. In the case of multiple witnesses, each interrogatory should be considered to apply to each witness who will testify to the information requested. Where copies of testimony, transcripts, or depositions are requested, each witness should respond individually to the information request.
7. Wherever the response to a request consists of a statement that the requested information is already available to Joint Intervenors, please provide a detailed citation to the document that contains the information. This citation shall include the title of the document, relevant page number(s), and, to the extent possible, paragraph number(s) and/or chart/table/figure number(s).

8. If you claim a privilege including, but not limited to, the attorney-client privilege or the work product doctrine, as grounds for not fully and completely responding to any discovery request, please describe the basis for your claim of privilege in sufficient detail so as to permit Joint Intervenors or the Commission to evaluate the validity of the claim. With respect to documents for which a privilege is claimed, please produce a "privilege log" that identifies the author, recipient, date, and subject matter of the documents or interrogatory answers for which you are asserting a claim of privilege and any other information pertinent to the claim that would enable Joint Intervenors or the Commission to evaluate the validity of such claims.
9. Whenever the documents responsive to a discovery request consist of modeling files (including inputs or output) and/or workpapers, the files and workpapers should be provided in machine-readable electronic format (e.g., Microsoft Excel), with all formulas and cell references intact.
10. The interrogatories are to be answered under oath by the witness(es) responsible for the answer.

INITIAL REHEARING REQUESTS PROPOUNDED TO
LOUISVILLE GAS & ELECTRIC COMPANY AND
KENTUCKY UTILITIES COMPANY BY JOINT
INTERVENORS

Joint Intervenors hereby tender the following initial requests for information to the Companies:

- 1.1. Please refer to the Louisville Gas and Electric Company and Kentucky Utilities Company Mill Creek Unit 6 – 60-Day Project Update #1 filed March 31, 2026 (“Project Update”) at page 5 of 8, and provide
 - a. A full copy of the economic development “pipeline.”
 - b. A map showing the potential data center (DC) locations and include the number of MW associated with each location (an update to the Companies’ Responses to the Commission Staff’s Post-Hearing Request for Information, in their most recent Integrated Resource Plan, Case No. 2024-00326, Q. 1).
- 1.2. Please refer to the Project Update at pages 3-4 of 8. State whether any projects have, since June 1, 2025, been removed or cleared from the pipeline due to inactivity, cancellation, request of the entity proposing the project, or any other reason besides the project going into service. If so, identify the total number of such projects that have been removed or cleared, and the total load for such projects.
- 1.3. Please refer to the Project Update at page 4 of 8.
 - a. Identify the total number of data center projects in the pipeline that have submitted Transmission Service Requests (“TSR”), and the total load for such projects.
 - b. Identify the total number of data center projects in the pipeline for which formal transmission studies have been completed, and the total load for such projects.
 - c. Identify the total number of data center projects in the pipeline that have entered into Reimbursement Agreements, and the total load for such projects.
 - d. Confirm that data center projects that have not submitted a TSR or entered into a Reimbursement Agreement have not made any financial commitments in order to be in the pipeline. If not confirmed, explain what other financial commitments are required for a data center project to be included in the pipeline.

- 1.4. Please refer to the Project Update at page 4 of 8. Identify the total number, and total load, of data center projects for which the Companies have incurred costs to:
 - a. Execute the projects identified by the TSR
 - b. Engineer and build substations
 - c. Procure long-lead equipment needed to serve the project
- 1.5. Please refer to the Companies' presentation attached to the Commission's Notice of Filing of Informal Conference Memo and Attendance List Intro the Record dated May 11, 2026 ("Presentation") at pages 4-5 (PDF 6-7 of the full filing), and clarify:
 - a. What is referred to at page 4 as the "power island agreement with GEV" to be executed by the end of April 2026?
 - b. Is this the same as the "LNTP/FNTP" referred to on page 5, row 14?
 - c. Please provide the full electronic, machine-readable version of the sheet shown on page 5.
 - d. Please provide the "power island agreement" and "LNTP/FNTP."
- 1.6. Please refer to pages 4-5 of the Presentation and provide:
 - a. The RFP for EPC, and
 - b. Bids received.
 - c. Any contracts executed.
- 1.7. Please provide the current projected total cost for Mill Creek 6, broken down by cost category (e.g., power island, EPC, etc.).
- 1.8. Please provide any environmental applications related to construction of Mill Creek 6, and any approvals received, such as air or water permits.
- 1.9. Please provide an update on the status of firm gas transportation service for Mill Creek 6, including all known pricing information.
- 1.10. Please also provide an update on the status of any bidding on Project Borealis, which the Companies had anticipated Texas Gas Transmission to hold an open season for in the fourth quarter of 2025.[Signature on next page]

Respectfully Submitted,



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CERTIFICATE OF SERVICE

In accordance with the Commission's July 22, 2021 Order in Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19*, this is to certify that the electronic filing was submitted to the Commission on May 22, 2026; that the documents in this electronic filing are a true representation of the materials prepared for the filing; and that the Commission has not excused any party from electronic filing procedures for this case at this time.



Byron L. Gary