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

In the Matter of:

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| ELECTRONIC MONITORING OF LOUISVILLE GAS & ELECTRIC COMPANY AND KENTUCKY UTILITIES COMPANY'S MILL CREEK 6 UNIT | ) ) ) | CASE NO. 2025-00313 |

# SUPPLEMENTAL 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: October 28, 2026

**SUPPLEMENTAL 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.

## 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.

**SUPPLEMENTAL 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**

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

2.1. Please refer to the Companies' response to JI 1.7 and provide an updated projected total cost for Mill Creek 6 in the same format, broken down by cost category (e.g. power island; engineering, procurement, and construction ("EPC"), etc.).

2.2. Please refer to the Louisville Gas and Electric Company and Kentucky Utilities Company Mill Creek Unit 6 – 60-Day Project Update #4 filed September 30, 2026 ("Project Update #4) at page 1 of 8.

a. Provide the January 20th EPC Request for Proposal ("RFP")

b. Provide the proposal responses and bids received in response to the January 20th RFP. If the bid proposals cannot be produced, please identify what criteria were used in the benchmarking exercise and how each proposal satisfied (or not) each criteria.

c. Provide the "benchmarking results" from the "benchmarking effort" the Companies initiated with other Utilities and Owners Engineers.

d. Explain in what ways the specifications for BR12 and MC6 were revised to "align the projects more closely with the market median."

e. Provide a copy of the updated EPC RFP and revised scope for BR12 and MC6 that was issued to bidders.

2.3. Please refer to Project Update #4 at page 3 of 8, stating: "The Companies will receive and review the updated EPC proposals by the end of November of 2026 and identify deficiencies and/or actionable value engineering opportunities," and provide any updated EPC proposals received prior to the time of response to these requests.

2.4. Please refer to Project Update #4 at page 4 of 8, indicating the 2026 pipeline includes 236 total projects.

a. Provide an updated copy of the economic development pipeline.

b. Please refer to the Companies' response to AG/KIUC 1.33 and PSC 2.17(g) in Case No. 2025-00045 and provide an update on the stage of each project in the economic development pipeline, including the "sales phase" of each project.

2.5. Please refer to the Companies' response to JI 1.2 and provide an update on the number of projects that have been removed or cleared from the economic development pipeline due to inactivity, cancellation, withdrawal by the proposing entity, or other similar reasons unrelated to the project entering service.

2.6. Please refer to the Companies' response to JI 1.3 and provide the following:

a. An update on the total number of data centers in the pipeline that have submitted Transmission Service Requests ("TSRs"), and the total load for such projects.

b. An update on the total number of data centers in the pipeline for which internal analysis and study of the Companies' transmission system has been completed to determine project feasibility.

c. An update on the total number of data center projects in the pipeline that have entered into Reimbursement Agreements, the total load for such projects, and copies of any Reimbursement Agreements.

d. The total number of data center projects in the economic development pipeline that have not submitted a TSR or entered into a Reimbursement Agreement.

2.7. Please refer to the Companies' response to JI 1.4, stating: "If the Companies have incurred costs to serve data center projects, those projects will have an executed Reimbursement Agreement associated with them," and identify the costs the Companies have incurred to date to serve data center projects .

2.8. Please refer to the Companies' response to JI 1.8 and provide any additional applications related to construction of Mill Creek 6, including any approvals received, such as air or water permits.

2.9. Please refer to the Companies' response to JI 1.9 and provide an update on the status of firm gas transportation service for Mill Creek 6, including all known pricing information.

2.10. Please refer to the Companies' response to JI 1.10 and provide an update on any bidding on Project Borealis.

2.11. Please refer to the Companies' response to Staff 1.6, stating: "The Companies have not made changes to the evaluation of the economic development pipeline or the load forecast as a result of Case No. 2025-00045."

a. Explain whether and when the Companies intend to change how it evaluates its economic development pipeline and data center load forecast in light of the Commission's October 28, 2025 Order in Case No. 2025-00045 at page 61, stating: "[T]he Commission is concerned that, on its face, LG&E/KU's methodology for arriving at 1,750 MW of data center load growth may not be reasonable. The Commission encourages LG&E/KU to consider following the recommendations of Joint Intervenors' witness, Elizabeth Stanton, when developing a load forecast related to data center load moving forward: (1) develop probability weights based on evidence, data, and analysis, (2) assign probability weights based on the specific details of each particular data center inquiry; (3) provide a transparent methodology with transparent assumptions made available to the Commission and stakeholders."

b. If not, explain why not.

2.12. Please refer to the Attachment to the Informal Conference Memorandum and Attendance List, filed into the record on October 26, 2026 at page 3 (PDF page 5 of 21) and provide the following:

a. The executed Long Term Service Agreement with GEV.

b. The Large Generator Interconnection initial report, as well as an estimated date of completion for the restudy.

2.13. Please refer to the Attachment to the Informal Conference Memorandum and Attendance List, filed into the record on October 26, 2026 at page 4 (PDF page 6 of 21) and explain what is meant by "submittals" from GEV.

2.14. Please refer to the Attachment to the Informal Conference Memorandum and Attendance List, filed into the record on October 26, 2026 at page 8 (PDF page 10 of 21), stating that "Current all in costs for Advance Class NGCCs range between $3000-$3200/kW and continues to experience upward price pressures – Compared to the as filed price of $2200/kW for MC6" and the Companies' statement that the "Power Island Agreement was executed [at approximately] 12 percent above the costs provided in the CPCN filing."

a. Provide the Companies' most recent MC6 project cost estimate.

b. Explain whether estimated costs for MC6 remain within 5 percent of the estimated costs in Case No. 2025-00045. If so, explain how. If not, explain

why not and provide a brief narrative description as provided for in Companies' response to Staff 1.8.

2.15. Please refer to the Attachment to the Informal Conference Memorandum and Attendance List, filed into the record on October 26, 2026 at page 8 (PDF page 10 of 21), stating: "Gas turbine availability has become the primary project development constraint. The pool of qualified EPC contractors capable of executing large combined-cycle projects remains constrained. Craft labor shortages continue to drive schedule and cost risk. Long Lead equipment remains supply constrained – particularly transformers, switchgear, and related balance-of-plant equipment. Project success is increasingly dependent on securing equipment/craft rather than optimizing cost."

a. Explain why gas turbine availability is a primary project development constraint given the Companies have spent $30 million on a Reservation Agreement.

b. Explain why the Companies are not using the same EPC contractor selected for MC5, identified on page 7 (PDF page 9 of 21) as "TIC."

c. Explain whether these constraints were known risks accounted for in the Companies' application for the MC6 CPCN.

d. Explain how the Companies expect these constraints could impact project development timelines and projected costs.

e. Explain what is meant by "Project success is increasingly dependent on securing equipment/craft rather than optimizing cost."

2.16. Please refer to page 8 of the Attachment to the Informal Conference Memorandum and Attendance List, filed into the record on October 26, 2026.

a. State the amount of Mill Creek 6 NGCC Project costs that are already subject to contract pricing (e.g., the contracted cost for the LongTerm Service Agreement).

b. With regard to Project costs that are already subject to contract pricing, state whether each contract price is firm, or not.

Respectfully Submitted,

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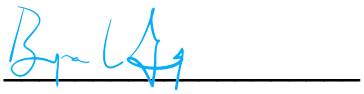
**CERTIFICATE OF SERVICE**

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 October 28, 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.



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