

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the matter of: :

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

**KENTUCKY COAL ASSOCIATION'S REQUEST FOR INFORMATION TO
LOUISVILLE GAS AND ELECTRIC COMPANY AND
KENTUCKY UTILITIES COMPANY**

The Kentucky Coal Association (KCA), intervenor in this proceeding, respectfully requests Louisville Gas and Electric Company and Kentucky Utilities Company (collectively, the "Companies") to respond to the following Requests for Information in accordance with the Commission's Order of Procedure entered herein.

Additional Instructions

- A. Each request for information shall be accorded a separate answer on a separate piece of paper, and each subpart thereof shall be accorded a separate answer. Each request or subpart thereof shall be specifically admitted or denied, and information inquiries or subparts thereof should not be combined for the purpose of supplying a common answer.
- B. Restate the information inquiry immediately preceding each response.
- C. Identify the name, title, and business address of each person(s) providing each response and provide the date on which the response was created.
- D. In answering these requests, utilize all information and documents that are available to you, including information in the possession of any of your agents, employees, or attorneys, or otherwise subject to your custody or control.
- E. If you object to any part of a request, answer all parts of such interrogatories or requests to which you do not object, and as to each part to which you do object, separately set forth the specific basis for the objection.
- F. If you claim any form of privilege or other protection from disclosure as a ground for withholding information responsive to a request, please explain your claim with sufficient specificity to permit KCA to make a full determination as to whether your claim is valid.
- G. Please attach written material to any answer for which written material is requested and/or available. If such written material is not available, state where it may be obtained. Please label the written material with the number of the request to which it pertains.

Definitions

1. "You" or "your" means the Companies or the witness, as the context requires.
2. "List," "describe," "explain," "specify," or "state" shall mean to set forth fully, in detail, and unambiguously each and every fact of which the Companies or their officers, employees,

agents, or representatives have knowledge which is relevant to the answer called for by the request.

3. "Document" or "documents" shall have the same meaning and scope as in Rule 34 of the Kentucky Rules of Civil Procedure, and shall include all writings and documentary material of any kind whatsoever, both originals and copies.

4. "Update" refers to the Louisville Gas and Electric Company and Kentucky Utilities Company Mill Creek Unit 6 – 60-Day Project Update #1, Case No. 2025-00313, dated March 31, 2026.

5. "Companies" refers collectively to Louisville Gas and Electric Company and Kentucky Utilities Company.

REQUEST FOR INFORMATION OF KCA

Q. 1 Please provide the Companies' projected demand loss (e.g., customer attrition, load reduction, facility closures, or other demand decreases) anticipated in the LG&E and KU service territory for each year from 2026 through 2031, including but not limited to:

- a. The methodology and assumptions used to estimate projected demand loss;
- b. Any industrial, commercial, or large load customer departures or load reductions known or anticipated as of the date of this filing; and
- c. Any planned facility retirements or closures by existing customers that would reduce load.

Q. 2 The 60-Day Project Update #1 reports a cumulative demand pipeline totaling approximately 11 GW, with data centers accounting for 10 GW of that total. Please provide the Companies' projected cumulative net demand (i.e., new demand additions less projected demand losses) through November 27, 2031 (the Guaranteed Final Completion date for MC6), broken down by year, including:

- a. The projected MW of new demand additions by year (2026–2031) by customer category (data centers, industrial, commercial, residential, other);
- b. The projected MW of demand losses by year (2026–2031);
- c. A net cumulative demand projection by year; and
- d. The probability-weighted demand projections used by the Companies in their capacity planning analysis supporting the MC6 project.

Q. 3 The Update states that 113 projects were announced between January 1, 2025 and March 2, 2026, representing approximately 247 MW of peak demand. Please provide:

- a. A list of those 113 announced projects by project category, MW of peak demand, and current status (in service, under construction, not yet in service);
- b. For any announced projects that have not yet executed a contract for service, the estimated timeline for execution and the probability of the project proceeding; and
- c. An explanation of how announced projects that do not ultimately execute a service contract are treated in the Companies' long-term demand forecasts.

Q. 4 The Update references the MC6 project being coordinated with the E.W. Brown Unit 12 (BR12) project. Please provide:

- a. A description of how the economies of scale from the combined MC6/BR12 procurement are quantified, including estimated savings attributable to the joint procurement;
- b. An explanation of any scheduling dependencies between MC6 and BR12 that could affect the MC6 timeline if the BR12 project is delayed or cancelled; and
- c. Whether any contracts executed jointly for MC6 and BR12 (including the Power Island Agreement or EPC Agreement) include provisions that would allow either project to proceed independently if the other is cancelled or delayed.

Q.5 Consistent with Question No. 1 (above) will the Companies agree to include any projected demand loss in any future updates provided on MC6.

Respectfully submitted,

/s/ Matt Malone

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CERTIFICATE OF SERVICE

I hereby certify that KCA's electronic filing is a true and accurate copy of KCA's pleading to be filed in this proceeding; that the electronic filing has been transmitted to the Commission on May 21, 2026; that there are currently no parties excused from participation by electronic service; and that electronic mail notification of the electronic filing has been provided to all parties of record on May 21, 2026.

/s/ Matt Malone
ATTORNEY FOR KCA