

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

**In the Matter of:**

<b>AN ELECTRONIC EXAMINATION OF THE</b>	)	
<b>APPLICATION OF THE FUEL ADJUSTMENT</b>	)	
<b>CLAUSE OF LOUISVILLE GAS AND ELECTRIC</b>	)	<b>CASE NO. 2025-00341</b>
<b>COMPANY FROM NOVEMBER 1, 2022</b>	)	
<b>THROUGH OCTOBER 31, 2024</b>	)	

**RESPONSE OF**  
**LOUISVILLE GAS AND ELECTRIC COMPANY**  
**TO**  
**COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION**  
**DATED MARCH 5, 2026**

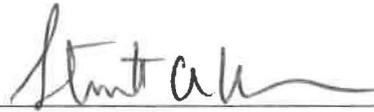
**FILED: MARCH 20, 2026**



VERIFICATION

COMMONWEALTH OF KENTUCKY )  
 )  
COUNTY OF JEFFERSON )

The undersigned, **Stuart A. Wilson**, being duly sworn, deposes and says that he is Director – Power Supply 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.

  
\_\_\_\_\_  
**Stuart A. Wilson**

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 9 day of MARCH 2026.

  
\_\_\_\_\_  
Notary Public  
Notary Public ID No. KYNP32193

My Commission Expires:

06-25-2029



**LOUISVILLE GAS AND ELECTRIC COMPANY**

**Response to Commission Staff's Third Request for Information  
Dated March 5, 2026**

**Case No. 2025-00341**

**Question No. 1**

**Responding Witness: Philip A. Imber**

Q-1. Regarding the repeal of the "Endangerment Finding" in Section 202(a) of the Clean Air Act:

- a. Explain how its repeal affects LG&E's current and future planning in its environmental compliance strategy.
- b. Explain how its repeal affects LG&E's current and future operating strategy.
- c. Explain whether its repeal affects LG&E's current and future planning as it relates to controls for any pollutant limitations listed in the National Ambient Air Quality Standards.
- d. If not discussed above, explain whether LG&E is aware of any pending relaxation of environmental control standards that may affect its current level of compliance related to fossil fuel generation.

A-1.

- a. *The Reconsideration of the Greenhouse Gas Endangerment Finding and Motor Vehicle Greenhouse Gas Emissions Standards Under the Clean Air Act*, signed on February 12, 2026, finalizes the recession of the *2009 Greenhouse Gas Endangerment Finding* ("EF"). The EF serves as a prerequisite for regulating greenhouse gases ("GHG") for motor vehicles and other sectors. The scope of this final rule is specific to motor vehicles and does not directly apply to GHG rules for the electric generating unit ("EGU") sector. Beyond the EF action, the Environmental Protection Agency ("EPA") must issue a final rule to repeal current EGU GHG regulations for LG&E to assess impact to current or future environmental compliance planning or operating strategy. The EF repeal does not affect the Company's current or future environmental compliance planning or operating strategy.
- b. See the response to part a.
- c. The referenced repeal applies solely to greenhouse gases and does not relate to the other criteria pollutants defined in the NAAQS. This action does not affect the Company's current or future planning for compliance with the NAAQS.

- d. The Company is not aware of any pending relaxation of environmental control standards that would affect its current level of compliance related to fossil fuel generation. The Company fully expects existing air-, water-, and waste-related environmental quality control systems to continue operating with no anticipated phase-out.

The Companies continue to monitor EPA actions but are unable to predict changes in regulation, regulatory guidance, legal interpretations, policy positions, and implementation actions. Further, durability of deregulation activities is uncertain (ability to withstand litigation). As a result, the Companies continue to propose and perform flexible compliance and operating strategies to ensure our ability to serve.

**LOUISVILLE GAS AND ELECTRIC COMPANY**

**Response to Commission Staff's Third Request for Information  
Dated March 5, 2026**

**Case No. 2025-00341**

**Question No. 2**

**Responding Witness: Stuart A. Wilson**

- Q-2. Refer to LG&E's Response to Commission Staff's Second Request for Information (Staff's Second Request), Item 10. Of the 723 reserve shutdowns due to generation load not being needed, explain whether the phrase "generation not being needed" also means that there were no off system sales opportunities outside the LG&E/KU system available.
- A-2. Confirmed. Almost all of these reserve shutdown events pertain to simple cycle combustion turbines, which are typically dispatched over a portion of a day to serve peak demands or in response to a baseload unit outage. The Companies monitor power markets continuously for the opportunity to make off-system sales or purchases. Before decommitting any unit and changing its status to reserve shutdown, the Companies consider off-system sales opportunities.

**LOUISVILLE GAS AND ELECTRIC COMPANY**

**Response to Commission Staff's Third Request for Information  
Dated March 5, 2026**

**Case No. 2025-00341**

**Question No. 3**

**Responding Witness: Philip A. Imber**

- Q-3. Refer to LG&E's Response to Staff's Second Request, Item 14. For non-fuel generation costs and with the recent elimination of the "endangerment clause" in Section 202(a) of the Clean Air Act, explain how that affects LG&E's plans for the continued use of its environmental controls. Include in the response whether it can simply choose not to run its pollution control equipment or if there is a timeline to phasing out the use of its controls.
- A-3. See the response to Question No. 1, part d.