

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC JOINT APPLICATION OF)	
KENTUCKY UTILITIES COMPANY AND)	CASE NO.
LOUISVILLE GAS AND ELECTRIC COMPANY)	2026-00077
FOR APPROVAL OF MERGER)	

**LOUISVILLE METRO’S AND LFUCG’S
FIRST REQUEST FOR INFORMATION TO LG&E/KU**

In accordance with the Public Service Commission’s (“Commission”) April 10, 2026 Order, Louisville/Jefferson County Metro Government (“Louisville Metro”) and Lexington-Fayette Urban County Government (“LFUCG”) propound the following data requests upon Kentucky Utilities Company (“KU”) and Louisville Gas and Electric Company (“LG&E”) (collectively, the “Companies”). The Companies shall respond to these requests in accordance with the provisions of the Commission’s April 10, 2026 Order, applicable regulations, and the instructions set forth below.

INSTRUCTIONS

1. Please provide written responses, together with any and all exhibits pertaining thereto, separately indexed and tabbed by each response.
2. The responses provided should restate LFUCG and Louisville Metro’s request and identify the witness(es) responsible for supplying the information.
3. If any request appears confusing, please request clarification directly from counsel for LFUCG and Louisville Metro.

4. Please answer each designated part of each information request separately. If you do not have complete information with respect to any item, please 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.

5. To the extent that the specific document, workpaper, or information does not exist as requested, but a similar document, workpaper, or information does exist, provide the similar document, workpaper, or information.

6. To the extent that any request may be answered by way of a computer printout, please identify each variable contained in the printout which would not be self-evident to a person not familiar with the printout.

7. If the Companies object to any request on any grounds, please notify counsel for LFUCG and Louisville Metro as soon as possible.

8. For any document withheld on the basis of privilege, state the following: date; author; addressee; blind copies; all persons to whom distributed, shown, or explained; and the nature and legal basis for the privilege asserted.

9. In the event any document called for has been destroyed or transferred beyond the control of the Companies, state the following: the identity of the person by whom it was destroyed or transferred, and the person authorizing the destruction or transfer; the time, place, and method of destruction or transfer; and, the reason(s) for its destruction or transfer. If destroyed or disposed of by operation of a retention policy, state the retention policy.

10. These requests shall be deemed continuing so as to require supplemental responses if the Companies receive or generate additional information within the scope of these requests between the time of the response and the time of any hearing conducted hereon.

Dated: May 1, 2026

Respectfully submitted,

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REQUESTS FOR INFORMATION

1. Describe the effect the proposed merger will have on current employees of the Companies, including, but not limited to, whether the proposed merger will cause a reduction or relocation of current employees.

2. State whether the Companies will retain a dedicated account representative for LFUCG and/or Louisville Metro that is available to have in-person meetings.

3. Describe any effects the proposed merger will have on offices or other physical locations of the Companies throughout the Companies' service territories, including, but not limited to, whether any regional offices, customer service locations, or other locations where employees of the Companies are based will be affected by the proposed merger and, if so, how they will be affected.

4. Describe the effects and costs, if any, of the proposed merger relating to existing franchise agreements of LG&E and KU, including, but not limited to:

- a. Whether the merger will require new franchises agreements;
- b. The anticipated actions and costs regarding existing franchise agreements:
- c. Effects on how any franchise fees are calculated and whether the franchise fees paid to LFUCG and Louisville Metro will increase or decrease.

5. Explain when the Companies expect to file their next base rate case. Also, assuming the merger is approved as proposed, identify any anticipated savings or additional costs regarding rate case expenses for the next base rate case.

6. Regarding the potential unification of rates between the Companies, explain:

a. Whether either company would experience, on average, higher or lower revenues as compared to if the Companies remained separate;

b. What effect would any potential savings from the proposed merger have on unified rates;

c. Whether any customer classes will benefit more from the merger than others; and

d. Whether any customer classes will experience higher or lower rates than if the Companies had not merged.

7. Refer to the Application, paragraphs 7 – 9, regarding the costs to merge the Companies' information technology systems. Fully explain the information technology systems upgrade that the Companies and PPL are currently undertaking and why this upgrade would not reduce or mitigate the "IT cost hurdle" in the event the merger is delayed.

8. Refer to the Application, paragraphs 10 – 11, confirm that KRS 278.020(6) contains no language prohibiting the Commission from imposing terms and conditions to the merger request as it deems necessary or appropriate in light of its exclusive jurisdiction over rates and service of Commission-regulated electric utilities under KRS 278.040.

9. Refer to the Application, paragraph 18.

a. State whether the Companies agree to continue their commitment to the various conditions included in the Companies' prior cases involving the Companies' acquisitions by Powergen, E.ON, and PPL.

b. State whether any conditions similar to those imposed in previous transactions cases involving the Companies would impose costs that would render the merger not beneficial.

10. Describe how the Companies will maintain the records for and file their respective required reports for the 2026 calendar year if the merger does not take effect on January 1, 2027.¹

11. Regarding unifying the fuel adjustment clause ("FAC") and Off-System Sales Adjustment Clause ("OSS") explain the following:

a. Whether there will be savings or additional costs with the removal of intersystem sales between the Companies;

b. Whether either respective company will experience an increase or decrease in the annual average of each company's FAC factor;

c. The effect unifying the OSS will have on the calculation of the OSS; and

d. Any anticipated savings or additional costs associated with energy and fuel procurement.

12. Refer to Conroy Direct, page 12, line 9. Explain whether the Companies, assuming timely receiving all required regulatory approval, anticipate the effective

¹ Reports refer to the reports utilities are required to be filed pursuant to 807 KAR 5:006, Section 4(1) and (2).

date of the merger will be January 1, 2027. If not, explain when the Companies anticipate that the merger would be effective.

13. Refer to Conroy Direct page 12, line 4. Explain what is required for LG&E to assume KU's fuel contracts and whether there will be any costs associated with such assumption.

14. Explain whether the merger will affect the dispatch of generating units or the Companies' stacking methodology.

15. Explain whether, under the recently approved Extremely High Load Factor tariff, either company after the merger will experience increased costs or risks from extremely high load factor customers than if the Companies had remained separate.

16. Refer to either company's Tariff, Sheet 35, Lighting service. Explain whether the proposed merger will affect how Lighting service rates. The explanation should include, but not be limited to, how the rates will be calculated, whether the Company's forecast revenues from lighting charges will change, and if the lighting rates for one or the other companies will increase or decrease.