

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

**ATTORNEY GENERAL’S RESPONSES TO DATA REQUESTS OF LOUISVILLE
GAS & ELECTRIC CO. AND KENTUCKY UTILITIES CO.**

The intervenor, the Attorney General of the Commonwealth of Kentucky, through his Office of Rate Intervention [“OAG”], hereby submits his Responses to Data Requests of Louisville Gas & Electric Co. and Kentucky Utilities Co. in the above-styled matter.

Respectfully submitted,

RUSSELL COLEMAN
ATTORNEY GENERAL



LAWRENCE W. COOK
J. MICHAEL WEST
ANGELA M. GOAD
T. TOLAND LACY
JOHN G. HORNE II
ASSISTANT ATTORNEYS GENERAL
1024 CAPITAL CENTER DR., STE. 200
FRANKFORT, KY 40601
(502) 696-5453
FAX: (502) 564-2698
Larry.Cook@ky.gov
Michael.West@ky.gov
Angela.Goad@ky.gov
Thomas.Lacy@ky.gov
John.Horne@ky.gov

Certificate of Service and Filing

Pursuant to the Commission's Orders in Case No. 2020-00085, and in accord with all other applicable law, Counsel certifies that an electronic copy of the forgoing was served and filed by e-mail to the parties of record. Counsel further certifies that the responses set forth herein are true and accurate to the best of their knowledge, information, and belief formed after a reasonable inquiry.

This 23rd day of June, 2026



Assistant Attorney General

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In Re: Electronic Joint Application of Kentucky Utilities Co. and Louisville Gas &
Electric Co. for Approval of Merger
Case No. 2026-00077
Attorney General's Responses to LG&E-KU Data Requests

WITNESS / RESPONDENT RESPONSIBLE:
LANE KOLLEN

QUESTION No. 1
Page 1 of 1

In Excel spreadsheet or other format, with all formulas, columns, and rows unprotected and fully accessible, please provide all workpapers and source documents not previously provided.

RESPONSE:

Refer to the Excel file provided by the AG in response to Staff 1-2.

WITNESS / RESPONDENT RESPONSIBLE:
LANE KOLLEN

QUESTION No. 2
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See Mr. Kollen's testimony at page 19, lines 4-11. For the referenced Duke Energy Carolinas, LLC and Duke Energy Progress, LLC merger case:

- a. Explain whether the projected savings in that case are of a similar nature to the projected savings in the Companies' merger case.
- b. Describe and quantify the savings in the Duke case and compare and contrast them with the savings in the Companies' merger case.

RESPONSE:

Refer to the Direct Testimony of Nelson Peeler at 23-34 in the Joint Application of Duke Energy Carolinas, LLC and Duke Energy Progress, LLC in Public Service Commission South Carolina Docket 2025-230-E for an overview of Duke Energy's CBAs and descriptions of the forecast merger savings. The forecast merger savings developed by Duke Energy in that case were more extensive and of greater magnitude in total than the limited savings forecast by KU and LG&E in this proceeding. The forecast merger administrative savings developed by Duke Energy were relatively small and generally consistent with the basis of the forecast merger administrative savings developed by KU and LG&E in this proceeding.

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WITNESS / RESPONDENT RESPONSIBLE:
LANE KOLLEN

QUESTION No.3
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See Mr. Kollen's testimony at page 17, lines 4-7. If the Commission authorized the Companies to use regulatory deferral accounting to account for base-rate-related reduced depreciation expense resulting from the proposed unified depreciation rates, would Mr. Kollen agree the Commission should approve the proposed unified depreciation rates? If your response is anything other than an unqualified yes, please provide a detailed explanation of your response.

RESPONSE:

No. There still is no compelling reason to change depreciation rates between base rate proceedings. Nevertheless, if the Commission authorizes the proposed change in depreciation rates, then the deferral of the reduction in depreciation expense to a regulatory liability and subsequent refund in a future base rate proceeding would be necessary to mitigate the harm to customers from the Companies' proposal.

WITNESS / RESPONDENT RESPONSIBLE:
LANE KOLLEN

QUESTION No. 4
Page 1 of 2

See Mr. Kollen's testimony at page 16, line 8. Identify all asset classes for which there are "missing depreciation rates."

RESPONSE:

For context, Mr. Kollen quotes his testimony as follows:

In addition, even a cursory review of the depreciation rates provided by the Companies in response to Staff discovery, but without the underlying study and workpapers, there appear to be problems that include missing depreciation rates and, for some plant accounts, anomalous rates that seem inconsistent with the expected results.²³

²³The Companies response to Staff 2-5 (the *Companies mistakenly identified this response as being to Staff 1-5, but the response, actually originally filed on May 1, 2026, appears to have been made in response to the PSC's second data requests*). Refer to Exhibit LK-2.

Mr. Kollen's testimony was based on a preliminary Excel workbook comparison developed under Mr. Kollen's supervision based on the "final" depreciation rates provided in response to Staff 2-5, but prior to the receipt of the Companies' comparison of the rates and calculation of the effects on depreciation expense in the form of a "depreciation proof" in response to AG 2-6. Although the Companies provided the "final" depreciation rates in response to Staff 2-5, they did not provide the underlying schedules or workpapers in that response. The Companies did not provide the underlying schedules and workpapers until they filed a supplemental response to Staff 2-5 on May 29, only five business days before the filing date for Intervenor testimony and after the date the AG could ask written discovery regarding the study and workpapers. The preliminary Excel workbook relied on the depreciation rates from Exhibit 2 (LG&E) and Exhibit 3 (KU) attached to the Companies' Stipulation Testimony of Robert Conroy and Christopher Garrett in Case Nos. 2025-00113 and 2025-00114 and the "final" depreciation rates from the initial response to Staff 2-5.

After Mr. Kollen developed the preliminary Excel workbook, the Companies' provided a comprehensive comparison of the "final" depreciation rates provided in the initial response to Staff 2-5 to the depreciation rates adopted by the Commission as a result of the Stipulation in Cases 2025-00113 and 2025-00114 in the response to AG 2-6. Mr. Kollen did not revisit or attempt to finalize or reconcile the results from the preliminary Excel workbook with the results from the Companies' response to AG 2-6. Mr. Kollen has attached the preliminary

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Excel workbook in response to this request, but notes that he relied on it solely for the testimony quoted above, and not for the quantifications of the harm to customers from the Companies' proposal, which were calculated by the Companies in response to AG 2-6 based on the depreciation study date of June 30, 2024.

WITNESS / RESPONDENT RESPONSIBLE:
LANE KOLLEN

QUESTION No. 5
Page 1 of 1

See Mr. Kollen's testimony at page 18, lines 6-10.

- a. Is it Mr. Kollen's position that the delay he proposes would be cost-effective? If the answer is yes, please state the basis for this position and supply all supporting calculations, documentation, and workpapers.
- b. Is it Mr. Kollen's position that the delay he proposes would result in administrative efficiencies? If the answer is yes, please state the basis for this position and supply all supporting calculations, documentation, and workpapers.

RESPONSE:

a., b. Mr. Kollen believes there would be no material difference in cost whether the modifications are made to consolidate the PowerPlant data at this time or at a later date. Further, even if the Commission adopted the proposed depreciation rates and required the reduction in depreciation expense to be deferred to a regulatory liability, the combined Company still would have to calculate the depreciation expense based on the depreciation rates for each legacy utility to calculate the reduction in depreciation expense each month.

AFFIDAVIT

STATE OF GEORGIA)


COUNTY OF FULTON)

LANE KOLLEN, being duly sworn, deposes and states: that the attached are his sworn responses and that the statements contained are true and correct to the best of his knowledge, information and belief.



Lane Kollen

Sworn to and subscribed before me on this
23rd day of June 2026.



Notary Public

