

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

**In the Matter of:**

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

**RESPONSE OF**  
**KENTUCKY UTILITIES COMPANY**  
**AND**  
**LOUISVILLE GAS AND ELECTRIC COMPANY**  
**TO**  
**LOUISVILLE/JEFFERSON COUNTY METRO GOVERNMENT AND**  
**LEXINGTON-FAYETTE URBAN COUNTY GOVERNMENT**  
**SUPPLEMENTAL REQUEST FOR INFORMATION**


**DATED MAY 22, 2026**

**FILED: MAY 29, 2026**

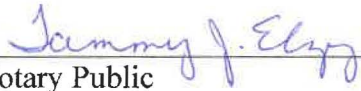
VERIFICATION

COMMONWEALTH OF KENTUCKY )  
 )  
COUNTY OF JEFFERSON )

The undersigned, **Robert M. Conroy**, being duly sworn, deposes and says that he is Vice President, State Regulation and Rates, for Kentucky Utilities Company and Louisville Gas and Electric Company and 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.

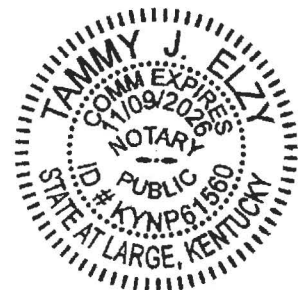
  
\_\_\_\_\_  
**Robert M. Conroy**

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 27<sup>th</sup> day of May 2026.

  
\_\_\_\_\_  
Notary Public

Notary Public ID No. KYNP61560

My Commission Expires:  
November 9, 2026



VERIFICATION

COMMONWEALTH OF KENTUCKY )  
 )  
COUNTY OF JEFFERSON )

The undersigned, **Christopher M. Garrett**, being duly sworn, deposes and says that he is Vice President of Financial Strategy and Chief Risk Officer for PPL Services Corporation and he provides services to Kentucky Utilities Company and Louisville Gas and Electric 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.

*Christopher M. Garrett*  
\_\_\_\_\_  
**Christopher M. Garrett**

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 26<sup>th</sup> day of May 2026.

*Tammy J. Ely*  
\_\_\_\_\_  
Notary Public

Notary Public ID No. KYNP61560

My Commission Expires:

November 9, 2026



**KENTUCKY UTILITIES COMPANY  
AND  
LOUISVILLE GAS AND ELECTRIC COMPANY**

**Response to Louisville/Jefferson County Metro Government and Lexington-Fayette  
Urban County Government  
Supplemental Request for Information  
Dated May 22, 2026**

**Case No. 2026-00077**

**Question No. 1**

**Responding Witness: Christopher M. Garrett**

Q-1. Refer to the response to Louisville Metro/LFUCG's Initial Request for Information, Item 1, in which the Companies state that, "employees of KU will transfer to LG&E and the majority of LG&E and KU Services employees will transfer to LG&E with certain employees transferring to PPL Services." Refer also to the response to Public Service Commission's Staff's Initial Request for Information, Item 23, in which the Companies state: "The previous merger studies included the potential elimination of approximately 10 full-time employees, primarily accounting positions."

Explain whether the 10 full time employees whose positions potentially could be eliminated are the "certain employees transferring to PPL Services."

A-1. The majority of the estimated 10 full-time employees are expected to transfer to PPL Services or are current PPL Services employees.

**KENTUCKY UTILITIES COMPANY  
AND  
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**Response to Louisville/Jefferson County Metro Government and Lexington-Fayette  
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**Question No. 2**

**Responding Witness: Robert M. Conroy**

- Q-2. Refer to the response to Louisville Metro/LFUCG's Initial Request for Information, Item 15. Explain whether, notwithstanding the protections in the Extremely High Load Factor tariff, either utility could incur risk or injury that would otherwise have been limited to the other utility without the merger.
- A-2. The EHLF tariff protection provisions are established to safeguard both the remaining retail customers and the Companies against risks associated with non-performance by exceptionally large load customers and potential stranded costs. These provisions are expected to remain effective and operate as intended following a merger. At present, it is not evident what additional risks or damage might arise that are not already addressed by the existing tariff provisions.

Moreover, contrary to the exclusively negative premise of the request, having a single legal entity rather than two can create benefits, including efficiency gains and potentially more favorable financing rates and costs. Also, although it is true that, for example, losing a major customer for one utility today would affect only that utility, it is equally true that gaining a major customer would benefit only one utility today. Overall, the Companies believe the benefits of merging into a single legal entity exceed the potential "risk[s] and injur[ies]" if the Companies merge now—while it is economical to do so.