COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

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| AN ELECTRONIC EXAMINATION OF THE |) | |
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| APPLICATION OF THE FUEL ADJUSTMENT |) | CASE NO. |
| CLAUSE OF LOUISVILLE GAS & ELECTRIC |) | 2020-00248 |
| COMPANY FROM NOVEMBER 1, 2019 |) | |
| THROUGH APRIL 30, 2020 |) | |

COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION TO LOUISVILLE GAS AND ELECTRIC COMPANY

Louisville Gas and Electric Company (LG&E), pursuant to 807 KAR 5:001, is to file with the Commission an electronic version of the following information. The information requested herein is due within 14 days of the date of this request. The Commission directs LG&E to the Commission's March 16, 2020 and March 24, 2020 Orders in Case No. 2020-00085, regarding filings with the Commission. The Commission expects the original documents to be filed with the Commission within 30 days of the lifting of the current state of emergency. All responses in paper medium shall be appropriately bound, tabbed, and indexed. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the name of the witness responsible for responding to the questions related to the information provided. Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or

¹ Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-* 19 (Ky. PSC Mar. 16, 2020), Order at 5–6. Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-* 19 (Ky. PSC Mar. 24, 2020), Order at 1–3.

association or a governmental agency, be accompanied by a signed certification of the preparer or the person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

LG&E shall make timely amendment to any prior response if LG&E obtains information that indicates the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which LG&E fails or refuses to furnish all or part of the requested information, LG&E shall provide a written explanation of the specific grounds for their failure to completely and precisely respond.

Careful attention shall be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, LG&E shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

- 1. Refer to LG&E's response to Staff's First Request for Information (Staff's Request) Item 3a, footnotes 1 and 2. Provide an update on the status of the contract with the Refined coal facility operator and whether LG&E intends to extend the contract.
- 2. Refer to LG&E's response to Staff's Request, Item 6, Attachment, page 1 of 1. Explain the process for LG&E purchasing natural gas from LG&E Gas Supply.

- 3. Refer to LG&E's response to Staff's Request, Item 9. Explain whether any of the on-site reviews and inspections of mining operations, scales, and sampling systems have uncovered or corrected any issues with fuel suppliers or transportation providers.
- 4. Refer to LG&E's response to Staff's Request, Item 10, page 2 of 2. If the Court's sustaining of LG&E's objection ultimately stands, explain whether LG&E will be able to walk away from the contract through Force Majeure with no further obligation to fulfill what would have been any remaining obligations under the contract.
 - 5. Refer to Staff's Request, Item 13. Provide the information as requested.
- 6. Refer to the fuel contract letter filed on the Commission's website on May 22, 2020, between LG&E and Alliance Coal in regards to the Black Lung Disability Trust Fund Excise Tax (BLET), attachment A, column labeled "BLET Increase for 2020 (per ton)".
 - a. Explain how the \$0.60 rate was derived.
- b. Explain any additional charges included in the \$0.60 rate that are included with the federally approved BLET rate.
- c. Explain whether the BLET has affected any additional fuel contracts for LG&E.



Kent A. Chandler
Acting Executive Director
Public Service Commission
P.O. Box 615
Frankfort, KY 40602

DATED OCT 09 2020

cc: Parties of Record

*Honorable Allyson K Sturgeon Managing Senior Counsel - Regulatory & LG&E and KU Energy LLC 220 West Main Street Louisville, KENTUCKY 40202

*Andrea M. Fackler Manager, Revenue Requirement LG&E and KU Energy LLC 220 West Main Street Louisville, KENTUCKY 40202

*Robert Conroy Vice President, State Regulation and Rates LG&E and KU Energy LLC 220 West Main Street Louisville, KENTUCKY 40202

*Louisville Gas and Electric Company 220 W. Main Street P. O. Box 32010 Louisville, KY 40232-2010

*Louisville Gas and Electric Company Louisville Gas and Electric Company 220 W. Main Street P. O. Box 32010 Louisville, KY 40232-2010