

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

AN ELECTRONIC EXAMINATION OF THE)	
APPLICATION OF THE FUEL ADJUSTMENT)	CASE NO.
CLAUSE OF LOUISVILLE GAS & ELECTRIC)	2021-00056
COMPANY FROM NOVEMBER 1, 2018)	
THROUGH OCTOBER 31, 2020)	

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

Louisville Gas & 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 on April 17, 2021. The Commission directs LG&E to the Commission's March 16, 2020 and March 24, 2020 Orders in Case No. 2020-00085¹ 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 association or a governmental agency, be accompanied by a signed certification of the

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.

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 its 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 the Direct Testimony of Delbert Billiter, page 2, line 23, and page 3, lines 1–4. Provide an update on how LG&E is working with White Stallion Energy and Eagle River Coal regarding contract deliveries and whether LG&E expects the companies to complete their contract obligations and when LG&E would expect to terminate the contracts.

2. Refer to the Direct Testimony of Charles R. Schram, page 3, lines 14–19.

a. For the natural gas units that are only served by a single natural gas pipeline, explain what is meant by “appropriate amounts of firm natural gas transportation capacity” and whether the amount of pipeline capacity is sufficient to serve each affected unit when the unit would be needed or expected to run.

b. Explain whether natural gas transportation for the units that are served by more than one natural gas pipeline is procured on a firm or spot basis. If on a spot basis, explain which units are affected and the rationale for not purchasing firm pipeline capacity.

3. Refer to the Direct Testimony of Stuart A. Wilson, page 2, lines 17–21. Provide recent examples of when LG&E would have purchased power at favorable prices, but was unable to do so due to transmission constraints and congestion.

4. Refer to LG&E’s response to the Commission Staff’s First Request for Information (Staff’s First Request), Item 2.

a. Explain whether ACNR Coal Sales, Inc. is the same company as Eagle River Coal, and if not, explain why Eagle River Coal is not listed in the table and the reasons for ACNR Coal Sales is behind in its contractual obligations.

b. Explain the difference between the tables on pages 1 and 2.

5. Refer to LG&E’s response to the Staff’s First Request, Item 10. Explain whether LG&E would continue to do business with the owners of coal companies that have proven unreliable in meeting contract obligations and whether LG&E’s due diligence screens out these companies.



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DATED APR 05 2021

cc: Parties of Record

Case No. 2021-00056

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