

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC TARIFF FILING OF KENTUCKY	)	
UTILITIES COMPANY FOR APPROVAL OF AN	)	CASE NO.
ECONOMIC DEVELOPMENT RIDER SPECIAL	)	2022-00371
CONTRACT WITH BITIKI-KY, LLC	)	

COMMISSION STAFF'S POST-HEARING REQUEST FOR INFORMATION  
TO KENTUCKY UTILITIES COMPANY

Kentucky Utilities Company (KU), pursuant to 807 KAR 5:001E, shall file with the Commission an electronic version of the following information. The information requested is due no later than June 14, 2023. The Commission directs KU to the Commission's July 22, 2021 Order in Case No. 2020-00085<sup>1</sup> regarding filings with the Commission. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the question to which the response is made and 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 preparer or the person supervising the preparation of the response on behalf of the entity that the

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<sup>1</sup> Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC July 22, 2021), Order (in which the Commission ordered that for case filings made on and after March 16, 2020, filers are NOT required to file the original physical copies of the filings required by 807 KAR 5:001, Section 8).

response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

KU shall make timely amendment to any prior response if KU obtains information that indicates the response was incorrect or incomplete when made or, though correct or complete when made, is now incorrect or incomplete in any material respect.

For any request to which KU fails or refuses to furnish all or part of the requested information, KU shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied and scanned 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, KU shall, in accordance with 807 KAR 5:001E, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. For each marginal demand cost calculation shown in KU's Rebuttal Testimony Exhibits SAW-1 through SAW-4 filed on February 21, 2023, provide a monthly billing comparison for the discount period in the same format as KU's response to Commission Staff's Second Request for Information, Item 4.

- a. Using these monthly billing comparisons, provide the break-even energy price for each year of the discount period for each scenario.

b. Explain how the Fuel Adjustment Clause (FAC) would affect the margins during the discount period.

2. Confirm that the FAC would at least partially recover energy rates in excess of the base rate amount.

3. Explain why it is reasonable to compare the base energy rate and total marginal variable costs of energy, including amounts that will be recovered through the FAC.

4. Refer to the Rebuttal Testimony of Stuart Wilson, page 6. Also refer to KU's planned for generation retirements and replacement units in Case Nos. 2022-00402 and 2023-00122.<sup>2</sup> Provide the forecasted reserve margins for the discount period assuming that no generation is retired, and no capacity additions are acquired.

5. Refer to KU's response to Joint Intervenor's First Request for Information, Item 13.

a. In Excel spreadsheet format, with all formulas, columns, and rows unprotected and fully accessible, provide the reserve margin analysis, with generation itemized by unit. Include projected retirements, additions, and any expected changes in capacity (e.g., modifications to existing facilities that increase or decrease capacity).

b. Explain what the high load and low load scenario represent in regard to the base load scenario.

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<sup>2</sup> Case No. 2022-00402, *Electronic Joint Application of Kentucky Utilities Company and Louisville Gas and Electric Company for Certificates of Public Convenience and Necessity and Site Compatibility Certificates and Approval of a Demand Side Management Plan and Approval of Fossil Fuel-Fired Generating Unit Retirements* (Ky. PSC Dec. 15, 2022); and Case No 2023-00122, *Electronic Joint Application of Kentucky Utilities Company and Louisville Gas and Electric Company for Approval of Fossil Fuel-Fired Generating Unit Retirements* (Ky. PSC May 10, 2023).

6. Provide the equivalent Loss of Load Expectation of KU's minimum reserve margin target.

7. Provide the dollar per megawatt cost of a natural gas combined cycle unit with carbon capture.



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DATED   JUN 02 2023  

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