

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC INVESTIGATION OF LOUISVILLE)	
GAS AND ELECTRIC COMPANY AND)	CASE NO.
KENTUCKY UTILITIES COMPANY SERVICE)	2023-00422
RELATED TO WINTER STORM ELLIOTT)	

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

Kentucky Utilities Company (KU) and Louisville Gas and Electric Company (LG&E) (jointly, LG&E/KU), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due on March 15, 2024. The Commission directs LG&E/KU to the Commission's July 22, 2021, Order in Case No. 2020-00085¹ 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

¹ 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).

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/KU shall make timely amendment to any prior response if LG&E/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 LG&E/KU fails or refuses to furnish all or part of the requested information, LG&E/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, LG&E/KU 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/KU's response to Commission Staff's First Request for Information (Staff's First Request), Item 1. Explain why LG&E/KU uses a 5 percent buffer when performing the transmission operator (TOP) operation planning studies and does not use a 5 percent buffer in other short-term load forecasting.

2. Refer to LG&E/KU's response to Staff's First Request, Item 2. Explain how LG&E/KU, as a load serving entity (LSE), aggregates the weather inputs into its short-term load forecast.

3. Refer to LG&E/KU's response to Staff's First Request, Item 3. Explain how LG&E/KU, as the Balancing Authority (BA), aggregates the weather inputs into its short-term load forecast.

4. Refer to LG&E/KU's response to Staff's First Request, Items 2 and 3. Explain why LG&E/KU relies on different weather forecasts and information in its capacity as a BA than as an LSE.

5. Refer to LG&E/KU's response to Staff's First Request, Item 7.

a. Explain from a resource planning perspective, why the capacity of the Dix Dam hydro station is assumed to be fully available to serve load during peak events. Include as part of the answer whether LG&E/KU assumes the Dix Dam hydro station will be fully available during extreme cold weather events.

6. Refer to LG&E/KU's response to Staff's First Request, Item 49(b). State whether LG&E/KU took any actions to address the three Curtailable Service Rider-2 (CSR-2) customers who were out of compliance on their contracted physical curtailment on December 23, 2022. Include in the answer whether LG&E/KU took any actions to address the two CSR-2 customers who were out of compliance on their contracted physical curtailment on December 24, 2023.

7. Refer to LG&E/KU's response to Staff's First Request, Item 56. Provide a list of the 136 customers with distributed generation and identify the 21 who have energy

storage or backup generation capacity. How does LG&E/KU determine or track customers having their own internal generation capacity?

8. Refer to LG&E/KU's supplemental response to Staff's First Request, Item 86, Attachment LGE-KU001_0000042. State whether LG&E/KU have assessed the operational coordination between the distribution control center (DCC) and the transmission control center (TCC) and what steps, if any, LG&E/KU have taken to address the issue following Winter Storm Elliott. If not, state why.

9. Refer to LG&E/KU's supplemental response to Staff's First Request, Item 86, Attachment LGE-KU001_0000042. State whether LG&E/KU made any public notices prior to initiating load shed. Include as part of the answer an explanation regarding why LG&E/KU believed its communications with key accounts was an area requiring improvement.

10. Refer to LG&E/KU's supplemental response to Staff's First Request, Item 86, Attachment LGE-KU001_0000042. Provide a list of safety events for LG&E/KU staff that occurred during Winter Storm Elliott.

11. Refer to LG&E/KU's supplemental response to Staff's First Request, Item 86, Attachment LGE-KU001_0000042. Provide any assessments conducted into whether high-load should be an alarming condition or an automated tripping condition for telemetered devices. Refer to LG&E/KU's supplemental response to Staff's First Request, Item 86, Attachment LGE-KU001_0000042. Define the term ERT as used in this document.

12. Refer to LG&E/KU's supplemental response to Staff's First Request, Item 86. Provide all final after-action review forms for each department, including, but not limited to, operations; customer experiences; communications; and safety. and

13. Refer to LG&E/KU's supplemental response to Staff's First Request, Item 86, Attachment LGE-KU001_0000047. Explain why "formal ERT processes [were] not utilized in lower level events; focus needed on ERT activities before formal structure initiated."

14. Refer to LG&E/KU's supplemental response to Staff's First Request, Item 86, Attachment LGE-KU001_0000047. Define the role of the "DCC ERT czar", as used by LG&E/KU in its supplemental response, is expected to have in future cold weather events.

15. Refer to LG&E/KU's supplemental response to Staff's First Request, Item 86, Attachment LGE-KU001_0000047. State whether ERT communication commitments have been updated to clarify use of circuit level ERTs.

16. Refer to LG&E/KU's supplemental response to Staff's First Request, Item 86, Attachment LGE-KU001_0000047. Explain the consequence of allowing ERTs to expire during Winter Storm Elliott.

17. Refer to LG&E/KU's supplemental response to Staff's First Request, Item 86, Attachment LGE-KU001_00000102. Identify in the record all information requested by FERC/NERC related to Winter Storm Elliott. Provide any information or documentation which is not currently in the record.

18. Refer to LG&E/KU's supplemental response to Staff's First Request, Item 86, Attachment LGE-KU001_0000042. Explain the difference between equipment

tripping out under load versus line faults and what steps LG&E/KU has taken since Winter Storm Elliott to improve performance in these areas in cold weather.

19. Refer to LG&E/KU's supplemental response to Staff's First Request, Item 86, Attachment LGE-KU001_0000042. Explain the policies and procedures used to determine when personnel in key IC roles are permitted to participate "as-called-upon basis v. actively staffing their IC role." State whether these policies and procedures have been updated following Winter Storm Elliott, and if so, provide any updated policies and procedures.

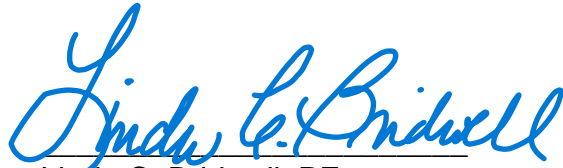
20. Refer to LG&E/KU's response to Joint Intervenors' Initial Request for Information (Joint Intervenors' Initial Request), Item 14. State whether LG&E/KU experienced any outages or derates during Winter Storm Heather in January 2024.

21. Refer to LG&E/KU's response to Joint Intervenors' Initial Request, Item 18a. State whether the companies had a fleet-wide cold weather plan prior to Winter Storm Elliott. Provide the plant specific cold weather plans for each plant that was in place prior to, and during, Winter Storm Elliott.

22. Refer to LG&E/KU's response to Joint Intervenors' Initial Request, Item 21. State whether the extreme event study for 2024 has been completed. If yes, provide the results of the study. If not, please identify when it is expected to be completed.

23. Refer to LG&E/KU's response to Staff's First Request, Item 66. Provide the "predetermined list which identifies and prioritizes circuits for the purpose of load shed during a Capacity Energy Emergency" which the referenced tool utilizes to determine the order circuits are chosen for load shed. How was this list created and how is it maintained?

24. Refer to LG&E/KU's response to Staff's First Request, Item 6. State whether LG&E/KU could have avoided load shed if it had operated below the NERC reserve margin guidelines. Include in the response, why LG&E/KU decided against operating below the NERC reserve margin guidelines.



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DATED MAR 01 2024

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