

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 POST-HEARING 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 no later than July 8, 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 20. State whether the study being conducted with Texas Gas Transmission regarding the potential costs and benefits of additional alternatives for supporting system reliability has been completed. If the study has been completed, provide a copy of the study. If the study has not been concluded, provide the

date on which LG&E/KU expects the study to be completed, and provide the copy within ten days of completion.

2. Refer to Staff's First Request, Item 36. Explain how much energy was not delivered as a result of PJM curtailing deliveries from Ohio Valley Electric Corporation (OVEC) to LG&E/KU on December 24, 2022.

3. Refer to LG&E/KU's response to Staff's First Request, Item 49b. Explain what the demand was for each of the three customers out of compliance with the Curtailable Service Rider-2 (CSR-2) one hour prior to the start of the December 23, 2022, physical curtailment.

a. Had the three customers complied on the CSR-2 on December 23, 2022, explain what the approximate kVA reduction expected from each of the three customers would have been.

b. Had the two customers complied with the CRS-2 on December 24, 2022, explain what the approximate kVA reduction would have been.

c. Provide a detailed explanation stating what caused each customer to be out of compliance with CSR-2 on December 23 and 24, 2022.

4. Refer to LG&E/KU's response to Staff's First Request, Item 85, Attachment After Action Review.

a. State what LG&E/KU's policy is for notifying the public of extreme weather events. Include as part of the answer what information, if any, LG&E/KU provides customers regarding energy conservation for weather events such as Winter Storm Elliott.

b. State whether LG&E/KU updated its policies for notifying the public after Winter Storm Elliott. Include as part of the answer all changes made to LG&E/KU's policies for such public notices.

5. Refer to LG&E/KU's response to Staff's First Request, Item 85, Attachment After Action Review.

a. Provide a detailed explanation of LG&E/KU's statement regarding a BA/BA agreement with MISO. Include as part of the answer all reasoning provided by MISO in determining that it would not sell energy to LG&E/KU.

b. Provide a detailed explanation of any follow-up conversations that occurred within LG&E/KU during and/or after Winter Storm Elliott regarding the lack of a BA/BA agreement.

c. State whether LG&E/KU has pursued, or is pursuing, a Balancing Authority (BA) to BA agreement with MISO or any other RTO. Include as part of your answer the status of any ongoing discussions or negotiations for such a BA/BA agreement.

d. Provide the expected scope or parameters of what a potential BA/BA agreement with MISO or another RTO would entail.

e. Explain whether follow up occurred with Policy and Tariffs as described under "What Did Not Go Well," on page 2.

f. Explain whether LG&E/KU has updated its internal procedures to communicate with Key Accounts during emergency events such as Winter Storm Elliott.

g. Provide any copies of operating protocols for Key Accounts that LG&E/KU keeps as records related to emergency events.

6. Refer to LG&E/KU's response to the Attorney General's First Request for Information, Item 2, Attachment, *Winter Storm Elliott Events in the LG&E and KU Balancing Authority Area (BAA) December 23-24, 2022*.

a. Provide a detailed explanation of the Brown 8 Unit "controls alarm for emissions limitation hit at 10:51, which caused the derating it 100 MW".

b. State whether LG&E/KU could have sought a waiver from the Department of Energy, or another agency, to operate the unit during Winter Storm Elliott. If LG&E/KU did not seek or consider seeking a waiver, then explain why not.

c. Provide an explanation of the process involved with seeking a waiver to operate an electrical unit during an emergency weather event beyond its emissions limitations.

7. Refer to Charles Schram's testimony at the formal hearing on May 23, 2024. Identify all other utilities, RTOs, or other markets which LG&E/KU contacted in an attempt to purchase energy between December 22 and December 25, 2022.

8. Refer to Charles Schram's testimony at the hearing on May 23, 2024, at 7:24:00 PM.

a. Provide all bids that were not met with a match and provide the reasoning for why those bids were not met, including being subject to Available Transfer Capability (ATC).

b. Provide a list of utilities that did not have the ATC to participate in the bidding process.

9. Refer to LG&E/KU's response to the Attorney General's First Request for Information, Item 2, Attachment *Winter Storm Elliott Events in the LG&E and KU*

Balancing Authority Area (BAA) December 23-24, 2022. Provide a chart detailing the energy shortfall for every hour LG&E/KU declared an Energy Emergency Alert (EEA) 2 or EEA-3 status.

10. Refer to Lonnie Bellar's Direct Testimony at the formal hearing on May 23, 2024, at 03:42:52 PM.

a. Explain how customers on life support equipment, hospitals, and other priority list are made aware of where on LG&E/KU's priority list they were located in case of emergency load shedding procedures before an emergency.

b. Explain how these priority customers know during an emergency if certain priority status is being considered for load shedding purposes.

c. Explain whether priority list customers will be made aware of their positioning on the priority list pursuant to current operating procedures.



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