

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF LOUISVILLE)	
GAS AND ELECTRIC COMPANY FOR A SITE)	
COMPATIBILITY CERTIFICATE FOR THE)	CASE NO.
CONSTRUCTION OF A BATTERY ENERGY)	2024-00082
STORAGE SYSTEM FACILITY AT E.W. BROWN)	
GENERATING STATION IN MERCER COUNTY,)	
KENTUCKY)	

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

Louisville Gas and Electric Company (LG&E), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due on July 26, 2024. The Commission directs LG&E 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 shall make timely amendment to any prior response if LG&E 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 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 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 shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Provide the planned setbacks for the battery energy storage facility. Include a table with the following:
 - a. the distance from the nearest road to the facility;
 - b. the distance from the nearest residence to the facility;

c. the distance from the nearest non-participating or non-LG&E-owned structure to the facility;

d. the distance from the facility to the nearest adjoining property boundary;

e. the distance from the nearest transmission structure including but not limited to lines or substation.

2. State whether there are any proposed structures or facilities related to the battery energy storage facility at E.W. Brown Generating Station that are 2,000 feet or closer to the following and, if so, provide the distance:

a. Residential neighborhood as defined in 278.700(6);

b. School;

c. Hospital; and

d. Nursing Facility.

3. Refer to LG&E's response to Commission Staff's First Request for Information, Item 4, and KRS 278.704(2). Explain all bases for LG&E's contention that the setback requirements contained in KRS 278.704 do not apply to battery projects. In this response include an explanation of the applicability of the first sentence of KRS 278.704(2) starting with "no construction certification shall be issued" to this case.

4. Refer to LG&E's notice requesting that this matter be taken under submission and decided based upon the written record. State whether LG&E continues to request that this matter be taken under submission and decided based upon the written record.

Linda C. Bridwell

Linda C. Bridwell, PE
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DATED JUL 17 2024

cc: Parties of Record

Case No. 2024-00082

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