

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF LOUISVILLE	)	
GAS AND ELECTRIC COMPANY FOR	)	
APPROVAL OF RETIRED ASSET RECOVERY	)	
RIDER COST RECOVERY FOR THE	)	CASE NO.
RETIREMENT OF MILL CREEK UNIT 1 AND OF	)	2024-00317
RETIRED ASSET RECOVERY RIDER TARIFF	)	
REVISIONS AND MONTHLY REPORTING	)	
FORMS	)	

COMMISSION STAFF'S FIRST 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 November 22, 2024. The Commission directs LG&E 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

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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).

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. Refer to the Application, page 7, regarding the electric vehicle charging tariffs.

- a. Explain whether LG&E proposes to update these tariffs to include reference to the Retired Asset Recovery Rider (Rider RAR). If not, explain why not.

b. Explain whether revenues will be computed for these rate classes for the purposes of the over-/under-recovery calculation for Rider RAR. If not, explain why not.

2. Refer to the Direct Testimony of Andrea M. Fackler (Fackler Direct Testimony), pages 6-7. Explain if the parties who were included in the Stipulation Agreement in LG&E's 2020 rate case, Case No. 2020-00350,<sup>2</sup> were notified of the proposed changes and revisions in this case for the Rider RAR. If not, explain why not.

3. Refer to the Fackler Direct Testimony, page 9 and Exhibit AMF-1. Provide the location in the proposed tariff and the Case No. 2020-00350 Stipulation Agreement of the proposed over-/under-recovery mechanism.

4. Refer to the Fackler Direct Testimony, page 13, lines 6–8, and Exhibit AMF-1, page 1. Explain how tax losses will be reflected in Accumulated Deferred Income Taxes.

5. Refer to the Fackler Direct Testimony, Exhibit AMF-2. Explain why LG&E proposes to change the effective date from service rendered to bills rendered.

6. Refer to the Fackler Direct Testimony, Exhibit AMF-2 and the Stipulation Agreement in LG&E's 2020 rate case, Case No. 2020-00350, page 14, which states, "The Retired Asset Recovery Rider will use the Group 1 and Group 2 methodology for revenue allocation used in the Utilities' Environmental Cost Recovery Surcharges."<sup>3</sup>

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<sup>2</sup> Case No. 2020-00350, *Electronic Application of Louisville Gas and Electric Company for an Adjustment of Its Electric and Gas Rates, a Certificate of Public Convenience and Necessity to Deploy Advanced Metering Infrastructure, Approval of Certain Regulatory and Accounting Treatments, and Establishment of a One-Year Surcredit* (KY PSC June 30, 2021).

<sup>3</sup> Case No. 2020-00350, June 30, 2021 Order, Appendix A, Stipulation Testimony Exhibit KWB-1, at 14, 5.3.(D).

- a. Explain why the Environmental Cost Recovery (ECR) Surcharge should be included in the R(m).
  - b. Provide the sequential order the Rider RAR and ECR Surcharge would be applied to customer bills.
7. Refer to the Fackler Direct Testimony, Exhibit AMF-4, page 2. Provide the calculation of the monthly levelized expense.
  8. Refer to the Direct Testimony of David Tummonds (Tummonds Direct Testimony), pages 3–4.
    - a. Provide the annual capital expenditures for Mill Creek 1 for the years 2010–2024, by year, separately identifying investments in common plant and those specific to Mill Creek 1.
    - b. Generally, describe the capital investments in Mill Creek 1 for those years.
  9. Refer to the Tummonds Direct Testimony, page 5. Provide a proposed timeline, by month, for decommissioning and demolition activities for Mill Creek 1.



Linda C. Bridwell, PE  
Executive Director  
Public Service Commission  
P.O. Box 615  
Frankfort, KY 40602

DATED NOV 06 2024

cc: Parties of Record

\*Andrea M. Fackler  
Manager, Revenue Requirement  
LG&E and KU Energy LLC  
220 West Main Street  
Louisville, KENTUCKY 40202

\*Louisville Gas and Electric Company  
220 W. Main Street  
P. O. Box 32010  
Louisville, KY 40232-2010

\*Honorable Allyson K Sturgeon  
Vice President and Deputy General Counsel-  
LG&E and KU Energy LLC  
220 West Main Street  
Louisville, KENTUCKY 40202

\*Sara Judd  
Senior Corporate Attorney  
LG&E and KU Energy LLC  
220 West Main Street  
Louisville, KENTUCKY 40202

\*Honorable W. Duncan Crosby III  
Attorney at Law  
Stoll Keenon Ogden, PLLC  
2000 PNC Plaza  
500 W Jefferson Street  
Louisville, KENTUCKY 40202-2828

\*Emily S. Childress  
STOLL KEENON OGDEN PLLC  
300 West Vine Street  
Suite 2100  
Lexington, KENTUCKY 40507-1801

\*Honorable Lindsey W Ingram, III  
Attorney at Law  
STOLL KEENON OGDEN PLLC  
300 West Vine Street  
Suite 2100  
Lexington, KENTUCKY 40507-1801

\*Robert Conroy  
Vice President, State Regulation and Rates  
LG&E and KU Energy LLC  
220 West Main Street  
Louisville, KENTUCKY 40202

\*Louisville Gas and Electric Company  
220 W. Main Street  
P. O. Box 32010  
Louisville, KY 40232-2010