

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 SECOND 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 December 20, 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. Refer to the Direct Testimony of Andrea Fackler (Fackler Testimony) at 14, starting on line 12. Although the initial calculated bill impact resulted in a negative percentage, provide the bill impact after approximately six months.

2. Refer to Case No. 2020-00350,² Stipulation Testimony, Exhibit KWB-1, Section 6.14 on page 18. Explain why the amendments to the tariff do not violate this provision of the Stipulation Agreement since the Retirement Asset Recovery Rider (Rider RAR) was tendered as Stipulation Exhibit 8 and Stipulation Exhibit 9.

3. Confirm that Rider RAR will only be calculated to reflect the retirement of Mill Creek 1. If not, confirmed explain why not.

4. Refer to Fackler Testimony at 7, lines 14–19. Explain why LG&E does not believe that including the Environmental Cost Recovery Surcharge revenues is a material change to the rider calculation.

5. Refer to LG&E's response to Commission Staff's First Request for Information (Staff's First Request), Item 6. Provide a hypothetical bill calculated as stated in this response for June 2025. Also, provide a hypothetical bill calculated based on the calculation of the Rider RAR component prior to the Environmental Cost Recovery (ECR) factor for June 2025.

6. Explain the basis for and reasoning behind LG&E's belief that including the Environmental Cost Recovery revenues in total and then calculating the Rider RAR billing factor accurately reflects only the retirement of Mill Creek 1.

7. Explain how LG&E will calculate the Rider RAR factor upon the retirement of another generation unit if the ten-year period of recovery for Mill Creek 1 has not yet expired.

² 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* (filed Apr. 19, 2021), Exhibit 1.

Linda Bridwell *ap*

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DATED DEC 12 2024

cc: Parties of Record

Case No. 2024-00317

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