

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC 2024 JOINT INTEGRATED)	
RESOURCE PLAN OF LOUISVILLE GAS AND)	CASE NO.
ELECTRIC COMPANY AND KENTUCKY)	2024-00326
UTILITIES COMPANY)	

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

Louisville Gas and Electric Company (LG&E) and Kentucky Utilities Company (KU) (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 February 11, 2025. 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 the Integrated Resource Plan (IRP), Volume I, pages 8–21. Provide an in-depth explanation, including projected program costs and projected energy savings, for the potential Demand-Side Management and Energy Efficiency program enhancements included in the IRP.

2. Refer to the IRP, Volume I, pages 8–22. Regarding the Business Demand Response program, explain the assumption that, by expanding eligible participation to customers between 50 kW and 200 kW, the number of customer opt-outs will increase.

3. Refer to IRP, Volume III, 2024 RTO Membership Analysis, pages 13–14. Explain whether LG&E/KU conducts an Effective Load Carrying Capacity (ELCC) study for each type of resource (wind, solar, and thermal). If not, explain what methodology LG&E/KU uses for capacity accreditation and how it differs from the ELCC analysis.

4. Explain whether LG&E/KU finds PJM Interconnection LLC's (PJM) ELCC methodology reasonable.

5. Refer to IRP, Volume III, Generation Planning and Analysis, October 2024, page 2, footnote 13.

a. Explain why the contribution to peak for solar in winter is set to zero.

b. Explain whether LG&E/KU would continue to assign a zero percent capacity factor to solar energy at E.W. Brown once the Battery Energy Storage System (BESS) is installed and operational.

6. Refer to IRP Volume III, Generation Planning and Analysis, October 2024, Table 2: Renewable Resources (2030 Installation; 2030 Dollars). Provide the unforced capacity (UCAP) for Kentucky Solar, Kentucky Wind, and Indiana Wind through the year 2039.

7. Refer to the following news article, Developers unveil plans for large tech data center in Louisville, the 1st of its kind in Kentucky² describing the development of a new, large scale data center.

8. Explain whether the three load forecast scenarios were created with the new large-scale data center in mind. If not, explain how incorporating the new, large scale data center would affect LG&E/KU's load forecasting.

9. Would LG&E/KU expect to file a special contract for Commission approval under LG&E's current Economic Development Rider if plans for the new, large scale data center were to be finalized? If not, explain why not.

10. Refer to LG&E/KU's response to Commission Staff's First Request for Information (Staff's First Request), Item 2. In addition to the 16 different data center projects that LG&E/KU's economic development team (Team) is involved, provide the number of large manufacturing facilities that the Team is working on.

11. Refer to LG&E/KU's response to Staff's First Request Item 2, Item 20, and Item 21.

a. In addition to the five transmission service requests (TSRs) for data centers submitted by LG&E/KU to Transerv, explain whether there have been any TSRs submitted for large manufacturing facilities.

b. For each TSR related project issued to-date, provide the date the each TSR was submitted, the projected number of MW needed to serve the applicant,


² [Developers Unveil Plans for Large Tech Data Center in Louisville, the 1st of Its Kind in Kentucky, In-depth, wdrb.com.](https://www.wdrb.com/news/developers-unveil-plans-for-large-tech-data-center-in-louisville-the-1st-of-its-kind-in-kentucky-in-depth)

and the projected number of construction and permanent jobs associated with each project.

12. Explain whether any of the project owner/developers have presented an Engineering, Procurement, and Construction contract.

13. Refer to LG&E/KU's response to Staff's First Request, Item 7. Explain what actions LG&E/KU have taken to achieve the target winter and summer reserve margin deficits.

14. Refer to LG&E/KU's response to the Sierra Club's First Request for Information (Sierra Club's First Request), Item 5b. Because unforced capacity (UCAP) is a measure of the capacity the natural gas combined cycle unit and simple cycle combustion turbine will actually provide, explain the rationale for modeling on an installed capacity basis for meeting minimum capacity reserves when for capacity dispatch an UCAP basis is employed.

 *RP*

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

DATED JAN 22 2025

cc: Parties of Record

*Angela M Goad
Assistant Attorney General
Office of the Attorney General Office of Rate
700 Capitol Avenue
Suite 20
Frankfort, KENTUCKY 40601-8204

*Joe F. Childers
Childers & Baxter PLLC
300 Lexington Building, 201 West Sho
Lexington, KENTUCKY 40507

*Nathaniel Shoaff
Sierra Club
2101
Webster St. , Suite 1300
Oakland, CALIFORNIA 94612

*Aaron D Reedy
Hurt, Deckard & May
The Equus Building
127 West Main Street
Lexington, KENTUCKY 40507

*John Horne
Office of the Attorney General Office of Rate
700 Capitol Avenue
Suite 20
Frankfort, KENTUCKY 40601-8204

*Rick E Lovekamp
Manager - Regulatory Affairs
LG&E and KU Energy LLC
220 West Main Street
Louisville, KENTUCKY 40202

*Ashley Wilmes
Kentucky Resources Council, Inc.
Post Office Box 1070
Frankfort, KENTUCKY 40602

*Kristin Henry
Staff Attorney
Sierra Club Environmental Law Program
2101 Webster Street
Suite 1300
Oakland, CALIFORNIA 94612

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

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

*Larry Cook
Assistant Attorney General
Office of the Attorney General Office of Rate
700 Capitol Avenue
Suite 20
Frankfort, KENTUCKY 40601-8204

*Randal A. Strobo
Strobo Barkley PLLC
239 South 5th Street
Ste 917
Louisville, KENTUCKY 40202

*Byron Gary
Kentucky Resources Council, Inc.
Post Office Box 1070
Frankfort, KENTUCKY 40602

*J. Michael West
Office of the Attorney General Office of Rate
700 Capitol Avenue
Suite 20
Frankfort, KENTUCKY 40601-8204

*Simon Mahan
Southern Renewable Energy Association
11610 Pleasant Ridge Road
Suite 103
Little Rock, ARKANSAS 72223

*Honorable David Edward Spenard
Strobo Barkley PLLC
239 South 5th Street
Ste 917
Louisville, KENTUCKY 40202

*Honorable Michael L Kurtz
Attorney at Law
Boehm, Kurtz & Lowry
36 East Seventh Street
Suite 1510
Cincinnati, OHIO 45202

*Kentucky Utilities Company
220 W. Main Street
P. O. Box 32010
Louisville, KY 40232-2010

*Jody Kyler Cohn
Boehm, Kurtz & Lowry
36 East Seventh Street
Suite 1510
Cincinnati, OHIO 45202

*Honorable Matthew R Malone
Attorney at Law
Hurt, Deckard & May
The Equus Building
127 West Main Street
Lexington, KENTUCKY 40507

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

*Whit Cox
Southern Renewable Energy Association
11610 Pleasant Ridge Road
Suite 103
Little Rock, ARKANSAS 72223