

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 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 June 21, 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 LG&E's response to Commission Staff's First Request for Information (Staff's First Request), Item 47, Attachment, page 22, 7.1.1 Possible Karst Areas. Given the results and recommendations in the Geotechnical Report, provide how LG&E will mitigate potential karst hazards which as the report states, can cause "catastrophic failures beneath buildings and structures".

2. Refer to LG&E's response to Staff's First Request, Item 2. Explain where in the bidding process the Engineering, Procurement, and Construction (EPC) selection is.

3. Refer to LG&E's response to Staff's First Request, Item 4. Identify and provide any of Mercer County's planning and zoning requirements that would be applicable to LG&E's proposed facility if LG&E was not exempt from all planning and zoning requirements pursuant to KRS 100.324 (i.e. requirements that would apply based on the nature of the facility without regard to an exception based on ownership by a utility).

4. Refer to LG&E's response to Staff's First Request, Item 7. State whether LG&E has had any contact with the city of Burgin, Kentucky regarding this project.



Linda C. Bridwell, PE
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Public Service Commission
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DATED JUN 06 2024

cc: Parties of Record

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