

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF KENTUCKY)	
UTILITIES COMPANY AND LOUISVILLE GAS)	CASE NO.
AND ELECTRIC COMPANY FOR CERTIFICATES)	2025-00045
OF PUBLIC CONVENIENCE AND NECESSITY)	
AND SITE COMPATIBILITY CERTIFICATES)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO SIERRA CLUB

Sierra Club, 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 3, 2025. The Commission directs Sierra Club 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 person supervising the preparation of the response on behalf of the entity that 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).

response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Sierra Club shall make timely amendment to any prior response if Sierra Club 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 Sierra Club fails or refuses to furnish all or part of the requested information, Sierra Club 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, Sierra Club 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 Chelsea Hotaling (Hotaling Direct Testimony), page 49. Provide the implementation timeline for the Good Neighbor Plan if it is upheld and goes into effect for Kentucky.

2. Refer to the Hotaling Direct Testimony, page 49 and the Direct Testimony of Phillip Imber, pages 5–6. Explain whether the State Implementation Plan requires Ozone reductions at Ghent 2.

3. Refer to the Direct Testimony of Stacy L Sherwood (Sherwood Direct Testimony), pages 3 and 4. Provide the workpapers relied upon to support the conclusions and calculations when stating that: “the potential savings of one less rate case, which averages a cost of \$3 million, would result in ratepayers paying carrying costs on the regulatory asset in the amount of \$406 million if the assets are in-service for 12 months before being included in the rate base. Provide any formulas or calculations in Excel format with the formulas and cells intact and unlocked.

4. Refer to the Sherwood Direct Testimony, pages 9 and 10 and Table 1 on page 10.

a. Provide the workpapers relied on in compiling Table 1. Include in the response any calculations or foundation documents. Provide any calculations or formulas in Excel format with the formulas and cells intact and unlocked.

b. Additionally, assume for the purposes of this request that 1050 MW of economic load growth materializes. State whether the witness would expect the residential rate impact to differ from Table 1. As part of the answer provide the expected residential rate impact to customers with the assumed load growth. Include all workpapers and foundational documents and provide any calculations in Excel format with formulas and cells intact and unlocked.

5. Refer to the Sherwood Direct Testimony, pages 10 and 11. State whether the witness is aware of other utilities who sought regulatory assets for post-in-service carrying costs, operations, and maintenance expense, property taxes, investment tax credit amortization, and depreciation expenses in similarly situated proceedings to this

case. If yes, provide, to the extent practicable, the utility involved, the jurisdiction, and the ultimate disposition of that issue in the identified case.

6. Refer to the Direct Testimony of Jeremy Fisher, pages 15 and 16.

a. Explain whether witness Fisher has a recommendation on how many MW of data center load growth should be reflected in Louisville Gas and Electric Company (LG&E) and Kentucky Utilities Company's (KU) (jointly, LG&E/KU) load forecast.

b. Explain what forecasting methodology witness Fisher recommends LG&E/KU adopt related to data center load growth. Provide any supporting documentation for the conclusion.

c. Refer to the Hotaling Direct Testimony, page 51, line 6. Provide details associated with the EPA's current position regarding the continuance of the 2015 Ozone National Ambient Air Quality Standards (NAAQS) regulations.

7. Refer to Hotaling Direct Testimony, page 18, line 6 through page 20, line 2.

a. Explain why it would not be unduly discriminatory for the Companies to request a "financial commitment from prospective customers" for making investments in generator resources when they do not do so for other large industrial and commercial customers seeking service.

b. Provide examples of other state commissions, including any relevant case reference, that have issued orders that their incumbent load serving entities (LSE) establish large load tariffs that include a requirement "to post collateral" or "some other financial mechanism" to establish a level of commitment.

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DATED JUN 20 2025

cc: Parties of Record

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