

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 THE ATTORNEY GENERAL AND  
KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC

The Attorney General of the Commonwealth of Kentucky, by and through the Office of Rate Intervention (Attorney General) and Kentucky Industrial Utility Customers, Inc (KIUC) (jointly, Attorney General/KIUC) 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 Attorney General/KIUC 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

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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).

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

Attorney General/KIUC shall make timely amendment to any prior response if Attorney General/KIUC obtain 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 Attorney General/KIUC fails or refuses to furnish all or part of the requested information, Attorney General/KIUC shall provide a written explanation of the specific grounds for their 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, Attorney General/KIUC 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 Direct Testimony of Lane Kollen (Kollen Direct Testimony), page 8.

8. Explain whether the Attorney General/KIUC has concerns regarding the inclusion of an equity return on rate base for post in service deferrals, other than the stated reasoning

that supports the generally accepted accounting principles and the Federal Energy Regulatory Commission's (FERC) uniform system of accounts limits that only allow reporting a deferred debt return on rate base.

2. Refer to Kollen Direct Testimony, pages 8 and 9. Explain whether witness Kollen recommends that any of the listed unaddressed costs and revenues be included in Louisville Gas & Electric Company and Kentucky Utilities Company's (jointly, LG&E/KU) present value revenue requirement calculation (PVRR). If so, identify which ones.

3. Refer to Kollen Direct Testimony, page 12. Explain why Witness Kollen recommends a Generation Cost Recovery Rider (GCRR) solely for Mill Creek 6 and not any of the other proposed generating units.

4. Refer to the Direct Testimony Leah Wellborn (Wellborn Direct Testimony), pages 10 and 11.

a. Provide the workpapers and/or related information relied on by Witness Wellborn when asserting that: "[t]he Companies currently only have 535 MW of economic development load in the announced or imminent pipeline phases, which could be served by existing resources and approval of the Brown 12 NGCC." Provide all Excel files with formulas intact and cells unlocked.

b. Additionally, state whether Witness Wellborn assumed that Mill Creek 2 remained operational in the assumption that Brown 12 was sufficient to serve 535 MW of load growth. If yes, include as part of the answer if, or when, Mill Creek 2 was assumed to retire.

5. Refer to the Wellborn Direct Testimony, Tables 3a and 3b.
  - a. Provide the workpapers relied on by Witness Wellborn in creating the tables. Provide any formulas and calculations in Excel format with the formulas intact and cells unlocked.
  - b. Explain why the summary begins in 2029 and not on an earlier date.
6. Refer to the Wellborn Direct Testimony, page 19. State whether the witness is aware of any jurisdictional utility that currently relies on tariffs or other provisions similar to the “amended EHLF rate[]” discussed in the testimony. If yes, provide the relevant tariff or other provisions; identify the utility, the jurisdiction, and whether any customer is taking service under such provisions, if known.
7. Refer to Wellborn Direct Testimony, page 14. Explain how many MW of economic development load growth LG&E/KU could reliably serve prior to the construction of Brown 12 and/or Ghent SCR.



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

DATED     **JUN 20 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, KY 40601-8204

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

\*Joshua Smith  
Sierra Club  
2101  
Webster St. , Suite 1300  
Oakland, CA 94612

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

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

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

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

\*Thomas J FitzGerald  
Counsel & Director  
Kentucky Resources Council, Inc.  
Post Office Box 1070  
Frankfort, KY 40602

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

\*Bethany Baxter  
Childers & Baxter PLLC  
300 Lexington Building, 201 West Sho  
Lexington, KY 40507

\*James W Gardner  
Sturgill, Turner, Barker & Moloney, PLLC  
333 West Vine Street  
Suite 1400  
Lexington, KY 40507

\*Michael West  
Office of the Attorney General Office of Rate  
700 Capitol Avenue  
Suite 20  
Frankfort, KY 40601-8204

\*Honorable William H May, III  
Attorney at Law  
Hurt, Crosbie & May PLLC  
The Equus Building  
127 West Main Street  
Lexington, KY 40507

\*Jody Kyler Cohn  
Boehm, Kurtz & Lowry  
425 Walnut Street  
Suite 2400  
Cincinnati, OH 45202

\*Honorable Michael L Kurtz  
Attorney at Law  
Boehm, Kurtz & Lowry  
425 Walnut Street  
Suite 2400  
Cincinnati, OH 45202

\*William H May, III  
Hurt, Deckard & May  
The Equus Building  
127 West Main Street  
Lexington, KY 40507

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

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

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

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

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

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

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

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

\*Toland Lacy  
Office of the Attorney General  
700 Capital Avenue  
Frankfort, KY 40601

\*Rebecca C. Price  
Sturgill, Turner, Barker & Moloney  
155 East Main Street  
Lexington, KY 40507

\*Tony Mendoza  
Staff Attorney  
Sierra Club Environmental Law Program  
2101 Webster Street  
Suite 1300  
Oakland, CA 94612

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

\*M. Todd Osterloh  
Sturgill, Turner, Barker & Moloney, PLLC  
333 West Vine Street  
Suite 1400  
Lexington, KY 40507

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

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

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

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