

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF KENTUCKY	)	
UTILITIES COMPANY FOR AN ADJUSTMENT OF	)	CASE NO.
ITS ELECTRIC RATES AND APPROVAL OF	)	2025-00113
CERTAIN REGULATORY AND ACCOUNTING	)	
TREATMENTS	)	

COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
TO ATTORNEY GENERAL AND KENTUCKY INDUSTRIAL UTILITIES CUSTOMERS

The Attorney General of the Commonwealth of Kentucky, by and through the Office of Rate Intervention (Attorney General) and Kentucky Industrial Utilities 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 October 10, 2025. The Commission directs Attorney General/KIUC 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

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).

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 fail or refuse to furnish all or part of the requested information, Attorney General/KIUC 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, 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 the Direct Testimony of Lane Kollen (Kollen Direct Testimony), page 69, lines 8-10. Given that KRS 278.264 does not apply to solar generating units, provide the justification for removing the decommissioning expense from Kentucky

Utilities Company (KU) and Louisville Gas & Electric (LG&E) (jointly, KU/LG&E) KU/LG&E's solar generating facilities.

2. Refer to the Kollen Direct Testimony, page 62. Explain why forecasting a negative expense for OPEB and post-employment benefits expense is fair, just and reasonable.

3. Refer to the Kollen Direct Testimony, page 71. Explain why the life spans of KU/LG&E's gas fired combined cycle, combustion turbine generating units, and solar arrays are "unnecessarily short".



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DATED **OCT 1 2025** _____

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