

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 POST-HEARING REQUEST FOR INFORMATION
TO KENTUCKY UTILITIES COMPANY

Kentucky Utilities Company (KU), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due no later than November 25, 2025. The Commission directs 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 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.

KU shall make timely amendment to any prior response if 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 KU fails or refuses to furnish all or part of the requested information, 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, 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 Stipulation, Exhibit 1, KU Electric Revenue Allocation and Rate Design Schedules.

a. Provide the Exhibit in Excel spreadsheet format with all formulas, rows, and columns unprotected and fully accessible.

b. Provide a table that compares the percentage of class revenue allocation for the fixed and volumetric charges of each rate class between the stipulation and application.

c. Provide a table that compares the percentage of revenue allocation to each rate class between the stipulation and application.

2. Refer to the Hearing Testimony of Tim S. Lyons (Lyons Hearing Testimony). Conduct a Federal Energy Regulatory Commission (FERC) 12 Coincident Peak (CP) test for KU and indicate if, those results support a 12 CP allocation or another allocation, with a detailed rationale.

3. Refer to the Hearing Testimony of Robert M. Conroy (Conroy Hearing Testimony). Provide the Generation Cost Recovery (GCR) billing factor and estimated bill impact for the year 2031.

4. Refer to Conroy Hearing Testimony. Provide the GCR adjustment clause estimated monthly bill impact for the years 2026, 2027, 2028, 2029, 2030, 2031, and 2032.

5. Refer to Conroy Hearing Testimony. Provide the Mill Creek 2 adjustment clause estimated monthly bill impact for the years 2026, 2027, 2028, 2029, 2030, 2031, and 2032. Include in the response any assumptions made with regard to the stay-open costs of Mill Creek 2.

6. Refer to Conroy Hearing Testimony. Provide the earned return on equity for KU, by month, for the years 2020, 2021, 2022, 2023, 2024, and 2025, year to date calculated in the same manner as proposed for the sharing mechanism.

7. Refer to Conroy Hearing Testimony. Provide an example calculation for how revenue would be normalized over the 13-month sharing mechanism period.

8. Refer to Conroy Hearing Testimony. Provide an updated analysis that compares the group 1 and group 2 methodology, used in the environmental cost recovery

mechanism (ECR) and proposed in the GCR, to the cost allocation utilized in a base rate case. In this comparison, update the analysis to include the extremely high load factor (EHLF) customers in group 2, as proposed in this case.

9. Refer to Conroy Hearing Testimony. Provide the annual storm damage expense embedded in KU's proposed base rates.

10. Refer to Conroy Hearing Testimony. Provide the percentage of revenue allocation for all classes between the fixed and volumetric charges. Additionally, include the amount of eliminated subsidization for each class.

11. Refer to Conroy Hearing Testimony. Provide the annual proposed vegetation management expense imbedded in KU's base rates.

12. Refer to Conroy Hearing Testimony. Provide the annual proposed depancaking expense imbedded in KU's base rates.

13. Provide an updated version of the Attachment to KU's response to Commission Staff's Second Request for Information (Staff's Second Request), Item 1, maintaining the same format and color coding, with the following revisions: (1) Changes made outside of this case since the case was filed that are still in effect marked in blue font; (2) Changes made as a result of discovery during this case highlighted in yellow; and (3) Changes made as a result of the stipulation, as well as the recently proposed Adjustment Clause MC2, marked in purple font. For clarity purposes, the Attachment to KU's response to Staff's Second Request, Item 1, should be the starting point, with any revisions to that document appropriately marked as described above.

14. Provide a clean version of the tariff as currently proposed by the Stipulation and Recommendation.

15. Refer to Conroy Hearing Testimony.
 - a. Provide a list of mechanisms the 9.90 percent ROE may apply to.
 - b. Confirm that application would not be automatic. If not confirmed, provide the basis for the authority to automatically apply the 9.90 percent ROE.
16. Refer to Conroy Hearing Testimony. Presuming that the stipulation is approved except for the provision that the Rate EHLF tariff would only be applied to new customers, provide how many current customers would fall under the stipulated EHLF tariff.
17. Refer to Conroy Hearing Testimony. Provide the workpapers for how the Maximum Load Charge per kVA was calculated for the EHLF tariff. Provide the exhibit in Excel spreadsheet format with all formulas, rows, and columns unprotected and fully accessible.
18. Refer to the Hearing Testimony of Dylan W. D'Ascendis (D'Ascendis Hearing Testimony). Specify the operating data selection criteria used to justify the exclusion of NorthWestern Corp. from the Electric Utility Proxy Group and explain how NorthWestern Corp.'s percentage of operating income and assets from regulated electric operations did not meet the screening criteria. In the response, include how NorthWestern Corporation's percentage of operating income and assets from regulated electric operations changed from the time original testimony was filed to the time the update to the analyses took place.
19. Refer to the Hearing Testimony of Christopher M. Garrett (Garrett Hearing Testimony). Explain how the following allocation factors impacted KU and how these have been applied:

- a. Rate Base ratio;
- b. Planned asset ratio;
- c. Provide three examples within the last 12 months of an expense allocated to KU, the ratio(s) applied, the resulting expense allocation.

20. Refer to the Hearing Testimony of Lonnie E. Bellar (Bellar Hearing Testimony). Provide the business plan for Mill Creek Unit 2 pertaining to the estimated timing and amounts of both capital investments and operating and maintenance (O&M) expense.

- a. Refer to Bellar Hearing Testimony. Provide what the O&M and rate base adjustments would be for the test period to include the stay open costs of Mill Creek Unit 2. Provide this information in Excel spreadsheet format with all formulas, rows, and columns unprotected and fully accessible.

- b. Refer to Bellar Hearing Testimony. Provide an update to and breakdown of the amount of investment for Mill Creek 2 stay open costs. Provide this information in Excel spreadsheet format with all formulas, rows, and columns unprotected and fully accessible.

21. Refer to KU's supplemental filing on October 31, 2025, Exhibit 5.

- a. In the MC2 LGE Tab Row 11 O&M, explain the negative values beginning in October 2027 and continuing in each subsequent October. Include in the response any workpapers in Excel spreadsheet format with all formulas, rows, and columns unprotected and fully accessible.

- b. Explain the large increases in O&M beginning in November 2027 and continuing in each subsequent November. Include in the response any workpapers in

Excel spreadsheet format with all formulas, rows, and columns unprotected and fully accessible.

22. For purposes of this request, assume that a final Order in this case was issued on December 31, 2025. For the Renewable Purchase Power Adjustment Clause, the Generation Cost Recovery Adjustment Clause, and the Mill Creek Unit 2 Adjustment Clause, provide the following for the period of January 2026 through January 2028:

- a. A timeline for filings with the Commission including but not limited to monthly updates or forms for review;
- b. A list of what would be included in each filing;
- c. The timeline for the review process and expected Order issuances, if applicable;
- d. A list of any filings as a result of these mechanisms that do not occur on a specific timeline; and
- e. Any proposed end dates for the mechanisms or a statement that the mechanisms are ongoing indefinitely.

23. For purposes of this request, assume that a final Order in this case was issued on December 31, 2025. For the Sharing Mechanism Adjustment Clause, provide the following through the date it ceases to be in effect:

- a. A timeline for filings with the Commission including but not limited to monthly updates or forms for review;
- b. A list of what would be included in each filing;
- c. The timeline for the review process and expected Order issuances, if applicable;

d. A list of any filings as a result of these mechanisms that do not occur on a specific timeline; and

e. Proposed end date for the mechanism, if any.

24. Refer to Bellar Hearing Testimony and KU's supplemental filing on October 31, 2025, Exhibit 5, Tab Estimated Bill Impact. Provide the bill impact if the Mill Creek Unit 2 recovery mechanism was combined with the GCR mechanism in the same format as originally filed. Include in the response the workpapers for the exhibit in Excel format with all cells unlocked and formulas intact.

25. Refer to Bellar Hearing Testimony. Provide a reference for each of the studies or reports referenced regarding the impacts of advanced metering infrastructure (AMI) on health. If the document is not publicly available, provide a copy of the information.

26. Refer to the Rebuttal Testimony of Vincent Poplaski, pages 4-5. The testimony explains that the issuance of Restricted Stock Units (RSUs) as a form of incentive compensation is a "time-based measure" rather than a financial measure.

a. Explain why RSUs are considered a time-based measure and not a financial measure, given that the RSU is tied to the stock price of KU's parent company.

b. Explain under what conditions an employee at KU would be awarded an RSU.

27. Refer to the Direct Testimony of Daniel Johnson, pages 16-23.

a. Explain how KU currently utilizes Artificial Intelligence (AI).

b. Provide any current policies related to AI.

c. Explain how PPL's plan to upgrade IT systems includes AI integration, beyond the creation of a data and AI team.

d. Explain whether KU believes that the implementation of AI will reduce future O&M expenses and, if so, how future O&M costs will be reduced.

28. Refer to KU's response to Commission Staff's Second Request for Information (Staff's Second Request) Request, Item 60, Attachment, page 8 of 19. Of those efficiencies noted, how many of the employee reductions will be in the Commonwealth of Kentucky.

29. Refer to the testimony provided generally. Provide the titles, roles and respective corporation or entities for each witness who provided testimony or responded to data requests in this case and reconcile any discrepancies between the affidavits, testimony, and supporting documentation. For example, in Christopher Garrett's Direct Testimony, page 1 and his Rebuttal Testimony, page 1 it lists his role as Vice President - Financial Strategy and Chief Risk Officer for PPL Services Corporation, but does not list that he is Vice President of Finance and Accounting for Kentucky Utilities Company and Louisville Gas and Electric Company as it states in the affidavit and the statement of education and work experience.

30. Refer to KU's response to Commission Staff's First Request for Information (Staff's First Request), Item 41. Provide attachments in Excel spreadsheet format with all formulas, rows, and columns unprotected and fully accessible.

31. Refer to the Hearing Testimony of John R. Crockett.

a. Provide all salary, wage and compensation information related to executive employees by name and title, in full, for affiliates, parents, and subsidiaries for

the employees listed in KU's response to Staff's First Request, Item 41, for the years 2020 through present day 2025. This response should be reconciled with the response to Item 31 as well. Provide all information in excel spreadsheet format with all formulas, rows, and columns unprotected and fully accessible.

b. Provide the individual affiliates, parents, and subsidiaries amounts for each employee for each of those years allocated, by entity of allocation.

c. Provide the number of employees solely employed by KU, if any.

32. Refer to the Hearing Testimony of John Bevington (Bevington Hearing Testimony). Explain how many projects in the economic pipeline would qualify for service pursuant to the EHLF tariff with the shift from 100 MVA to 50 MVA.

33. Refer to Bevington Hearing Testimony. Provide an updated project tracking document for the economic development pipeline, including the total expected MW for each project.

34. Provide a copy of the most recent Fiserve agreement.

35. Provide any updates, if available, to the Pre-Pay tariff development. Include any sample bills or bill summaries.

36. Refer to the response to Staff's Second Request, Item 66. Confirm that the expenses related to the five year IT business plan are included in the base rate calculation in this proceeding. If not confirmed, specifically identify the amount of IT upgrades included in the base period and the forecast period, respectively.

37. Refer to the Hearing Testimony of Peter Waldrab (Waldrab Hearing Testimony). For each regulatory asset recorded based on storm damages over the past five years provide the following:

- a. The Tmed threshold for the year of the storm;
- b. The amount of customer minutes of interruption (CMI);
- c. Whether the storm qualified as a Major Event Day under IEEE Standard 1366;

38. Refer to Waldrab Hearing Testimony. Provide a breakdown of the types of solar panels (i.e. fixed tilt, single-access tracking) for NM-2 customers.

39. Refer to Waldrab Hearing Testimony. Provide the system daily peak and seasonable peak for both the summer and winter.

40. Refer to the Rebuttal Testimony of Charles R. Schram at 2, which referred to one Curtailable Service Rider (CSR) physical curtailment in 2025.

- a. Explain the need for physical curtailment during this 2025 event.
- b. Explain whether the CSR-1 and CSR-2 customers curtailed the amounts required by contract and, if not, whether there were any consequences for the customer.
- c. Provide the total amount of MW curtailed by these customers during this 2025 event.
- d. Refer to KU's response to Commission Staff's Fourth Request for Information, Item 14. Provide an updated avoided capacity cost analysis for qualifying facility (QF) rates utilizing the methodology approved in 2023-00404² and the updated

² Case No. 2023-00404, *Electronic Tariff Filings of Louisville Gas and Electric Company and Kentucky Utilities Company to Revise Purchase Rates for Small Capacity and Large Capacity Cogeneration and Power Production Qualifying Facilities and Net Metering Service-2 Credit Rates* (Ky. PSC Aug. 30, 2024), Order.

assumptions listed in Item 14. Provide this information in Excel spreadsheet format with all formulas, rows, and columns unprotected and fully accessible.

41. Refer to the Hearing Testimony of Drew McCombs and KU's response to the Attorney General/Kentucky Industrial Utility Customers (Attorney General/KIUC)'s Second Request for Information, Item 39.

a. Explain the decrease for maintenance of overhead lines and operation supervision and engineering between the base period and test period.

b. Explain the benefits of including some amount of storm damage expense in the revenue requirement versus deferring all storm damage costs.

42. Refer to the Hearing Testimony of Michael E. Hornung (Hornung Hearing Testimony). Refer also to the Direct Testimony of Michael E. Hornung, page 3. Explain how the rates for the Residential Time-of-Day tariffs can vary based upon service territory, but the peak times do not vary based upon utility-specific system peaks.

43. Refer to the Hornung Hearing Testimony. Provide the monthly residential peak periods for KU only, excluding any data related to LG&E customers.

44. Refer to the Hornung Hearing Testimony. Explain in detail why LG&E/KU utilized combined system data to specify the peaks in residential time of day (RTOD), rather than utility-specific peaks.

45. Refer to the Hornung Hearing Testimony. Explain why an anti-islanding safety feature should be added to the Net Metering Interconnection Guidelines.

46. Refer to the Hornung Hearing Testimony. Provide the language that will be added to the General Service (GS) and Power Service (PS) tariffs if the Commission approves KU's proposal regarding legacy GS/PS customers.

47. Refer to Hornung Hearing Testimony. Assuming the Commission approves KU's proposal regarding legacy GS/PS customers, explain whether LG&E/KU would commit to pre-emptively communicating and working with the affected customers in the future if their usage indicates that they are on the path to being moved to another rate schedule.

48. Refer to Hornung Hearing Testimony. Explain when KU changed its policy regarding Transmission Service Requests (TSR) and Related Implementation costs. Include in the response the amounts collected by KU in relation to TSRs and Related Implementation Costs since the policy was changed.

49. Refer to the Hornung Hearing Testimony. Explain whether a decrease to a Net Metering Service-1 (NMS-1) eligible customer-generator's generation capacity would result in the loss of NMS-1 legacy status.

50. Refer to the Hornung Hearing Testimony. Explain whether any increase to a NMS-1 eligible customer generator's generation capacity, no matter the size, would result in the loss of NMS-1 legacy status.

51. Refer to the Direct Testimony of Tim S. Lyons, page 29, lines 15-16.

a. Explain how KU determined its inflation factor for its special charges cost justification.

b. Explain whether the Commission has ever accepted an adjustment to special charges based upon an inflation factor and identify any such instances.

52. Refer to KU's response to Staff's First Request, Item 41. KU's response to the request was not responsive. Provide the information listed in 41 (a)-(o) as requested in the format of Schedule K. For each executive officer, list out by name and titles. In

schedule K, be sure to provide the amounts, in gross dollars, separately for total company operations and jurisdictional operations information individually for each corporate officer. For clarity, total company operations refer to PPL Corporation and all subsidiaries. Provide also the following listed items:

- a. Overtime pay, individually for each executive officer, or a statement that there is none;
- b. Confirmation that the bonus listed in Attachment 3 includes incentive compensation. If not confirmed, provide total incentive compensation for each executive officer;
- c. The stock options for each individual corporate officer;
- d. Total deferred compensation for each individual corporate officer;
- e. The total company operations compensation amount and total jurisdiction operations compensation amount for each individual corporate officer; and
- f. A description for Attachment 3, as none was included in the body of the data response.

53. Refer to the Hearing Testimony of Andrea M. Fackler regarding the revisions to KU's Retired Asset Recovery tariff (Tariff RAR). Provide an updated clean and redlined version of KU's Tariff RAR based on Ms. Fackler's statement that the removal of the concept of jurisdictionalizing the revenue requirement for KU's retired generating units was an error.

54. Provide the following allocations for a period of 15 years beginning in the first year of in-service for Mill Creek 5: (1) capital costs; (2) operating costs and (3) return on the costs of a combined cycle for each respective customer class:

- a. Using the COSS(s) provided in a rate application, and
- b. If recovered via the proposed generation cost recovery mechanism.
- c. Include in this response a narrative description of the notable differences in results for each customer class.
- d. Provide the responses to part (a) and part (b) in Excel spreadsheet format with all formulas, rows, and columns unprotected and fully accessible.



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DATED NOV 12 2025

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