## COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

## In the Matter of:

ELECTRONIC APPLICATION OF LOUISVILLE	)	
GAS AND ELECTRIC COMPANY FOR AN	)	
ADJUSTMENT OF ITS ELECTRIC AND GAS	)	CASE NO.
RATES AND APPROVAL OF CERTAIN	)	2025-00114
REGULATORY AND ACCOUNTING	)	
TREATMENTS	)	

## COMMISSION STAFF'S POST-HEARING 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 and Kentucky Industrial Utilities Customers (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 no later than November 25, 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

<sup>&</sup>lt;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 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 Hearing Testimony of Leah Wellborn (Wellborn Hearing Testimony). Explain whether the 6 Coincident Peak methodology results in a lower allocation of costs to residential ratepayers as compared to the 12 Coincident Peak

methodology. Identify and explain any distinction between both Kentucky Utilities Company (KU) and Louisville Gas and Electric Company (LG&E) in the response.

2. Refer to the Wellborn Hearing Testimony. Explain whether the 6 Coincident Peak methodology is more reasonable for both utilities as compared the 12 coincident Peak methodology given the differences in LG&E's and KU's system peaking periods.

3. Refer to the Wellborn Hearing Testimony. Identify and explain which customer rate class(es) a 6 Coincident Peak methodology would benefit as compared to a 12 Coincident Peak methodology.

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Linda C. Bridwell, PE

Linda C. Bridwell, PE Executive Director

**Public Service Commission** 

P.O. Box 615

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DATED **NOV 12 2025** 

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