

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

AN ELECTRONIC EXAMINATION OF THE)
APPLICATION OF THE FUEL ADJUSTMENT) CASE NO.
CLAUSE OF KENTUCKY UTILITIES COMPANY) 2025-00340
FROM NOVEMBER 1, 2022 THROUGH)
OCTOBER 31, 2024.)

COMMISSION STAFF'S SECOND 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 on February 20, 2026. 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. Explain whether KU has ever sold or would consider selling generation capacity for any length of time into Midcontinent Independent System Operator (MISO), PJM Interconnection LLC (PJM), or to any other entity.

2. Refer to the Direct Testimony of Andrea Fackler (Fackler Direct Testimony), page 7, lines 15-22. Of the \$401 million in purchased fuel and power expense attributable to Louisville Gas and Electric Company (LG&E), and \$569 million attributable to Kentucky Utilities Company (KU) (collectively, KU/LG&E) incurred for the 12-month period ending

November 2025, explain how much of the expense is accounted for by fuel purchases, power purchases from each of the utilities selling power to each other, and how much is attributable to fuel or power purchases from outside of KU and LG&E. Include a complete breakdown of the amounts for fuel purchases separately from power purchases.

3. Refer to the Direct Testimony of Stuart A. Wilson (Wilson Direct Testimony), page 3, lines 14-21, and page 5, lines 1-4. Explain how KU decides how much natural gas to procure through forward contracts.

4. Refer to the Wilson Direct Testimony, page 4, lines 1-4.

a. Explain whether Cane Run Unit 7 is served by one or two interstate pipelines.

b. Explain whether Cane Run Unit 7 is fully supported with firm pipeline transportation.

5. Refer to the Wilson Direct Testimony, page 6, lines 18-23. Explain the imbalance provisions of the transportation agreements and how they function such that they can be used to reduce gas purchases during limited periods of gas price spikes.

6. Refer to the Direct Testimony of Delbert Billiter (Billiter Direct Testimony), page 3, lines 13-15. Explain Norfolk Southern's issues that impacted coal deliveries and how those issues were resolved.

7. Refer to the Billiter Direct Testimony, page 7, lines 15-20. Provide the coal price comparison that demonstrates KU's coal costs were reasonable.

8. Refer to the Direct Testimony of James R. Frank (Frank Direct Testimony), page 3, lines 13-16.

a. Confirm that when KU looks for power purchase opportunities in the wholesale power market, it means Tennessee Valley Authority (TVA), MISO, and PJM. If this cannot be confirmed, provide what KU means.

b. Explain how KU monitors the wholesale power market and then makes decisions to purchase hourly power. Include in the response if KU calculates the hourly marginal price of their generation as compared to current and forecast wholesale power market marginal prices.

9. Refer to the Frank Direct Testimony, page 4, lines 13-14. Explain whether any of KU's power sales or purchase practices, or procedures, will change once KU/LG&E's yet to be proposed merger is finalized. If so, explain the anticipated changes.

10. Refer to the Direct Testimony of Michael P. Drake (Drake Direct Testimony), page 3, lines 1-2.

a. Explain how reserve shutdown differs from a maintenance or forced outage.

b. Explain whether and why any generation units were placed in reserve shutdown during the two-year review period.

11. Refer to the Drake Direct Testimony, Exhibit MPD-1.

a. On page 1 of 8, explain what a borescope is and what is being inspected during a borescope inspection.

b. On page 2 of 8, explain what combustion turbine blading entails.

12. Refer to KU's response to Commission Staff's First Request for Information (Staff's First Request), Item 4, page 2 of 2, and the Confidential Attachment to Item 4.

[REDACTED]

13. Refer to KU's response to Staff's First Request, Item 6.

- For each forward natural gas contract, provide the contract length and the forward time period over which the gas will be delivered.
- If not already provided, provide a copy of the forward natural gas purchase contracts.

14. Refer to KU's response to Staff's First Request, Item 13. KU makes the majority of its electric sales to LG&E.

- After the planned merger between KU and LG&E is approved and completed, explain whether the analogous post-merger schedules will look similar to current FAC filings with the Commission, with the exception that there would be no LG&E sales, or explain any foreseen differences in the filings.
- Explain what cost components are included in the tables' Other Charges (\$) columns.

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DATED _____

cc: Parties of Record

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