

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 FOURTH REQUEST FOR INFORMATION
TO LOUISVILLE GAS AND ELECTRIC COMPANY

Louisville Gas and Electric Company (LG&E), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due on September 23, 2025. The Commission directs LG&E 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

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).

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.

LG&E shall make timely amendment to any prior response if LG&E 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 LG&E fails or refuses to furnish all or part of the requested information, LG&E 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, LG&E 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 Shannon L. Montgomery (Montgomery Direct Testimony), page 11, lines 16–20. Provide the amount of savings LG&E has estimated and used in this case as a result of the paperless billing proposal and provide a detailed explanation for how the savings were calculated.

2. Refer to the Montgomery Direct Testimony, page 23, lines 7–13. Explain why LG&E believes removing the requirement that customers who purchase new smart thermostats through the Online Transactional Marketplace be automatically enrolled in the Bring Your Own Device program for smart thermostats would increase smart thermostat purchases through the Online Transactional Marketplace.

3. Refer to the Montgomery Direct Testimony, page 25, line 20, through page 28, line 8.

a. Provide a detailed explanation of the disconnection/reconnection process beginning with the customer receiving a low funds alert and ending with reconnection.

b. Explain whether a prepay customer whose balance reaches zero after hours, on a weekend, or on a holiday will be immediately disconnected upon the balance reaching zero or whether the disconnection will occur at a later time, for example, on the next business day during regular business hours.

4. Refer to the Direct Testimony of Michael E. Hornung, page 8, lines 7–22.

a. Provide any insights LG&E has identified through the offering of the General Service Time-of-Day (GTOD) rates.

b. Explain whether LG&E has experienced any adverse revenue impacts through the offering of the GTOD rates.

5. Refer to the Direct Testimony of Michael E. Hornung, page 21, lines 3–4. Also refer to LG&E's response to Commission Staff's Third Request for Information, Item 10. Explain why LG&E is proposing to remove the cap on the amount of Solar Share Facilities capacity a customer may subscribe.

6. Refer to the Direct Testimony of Michael E. Hornung, page 25, line 13, through page 26, line 6.

a. Explain LG&E's current practices and assignment of cost responsibility concerning customers or prospective customers who request service resulting in Transmission Service Requests (TSR) and eventual transmission system-related additions or upgrades and identify the provision, if any, in the current tariff that addresses such practices and cost responsibility.

b. Explain what type of service would require LG&E to issue a TSR to its Independent Transmission Organization.

c. Explain the rationale for setting the threshold for existing customers to enter into engineering, procurement, and construction agreements to cover all transmission-related costs LG&E incurs related to any studied service at \$10 million.

7. Refer to LG&E's response to Commission Staff's Second Request for Information (Staff's Second Request), Item 28.

a. Provide the citations to Kentucky law that address liability protection that LG&E relied upon in drafting its revised liability language.

b. Explain how the liability-limitation language in LG&E's current tariffs is inadequate to protect LG&E and its customers.

8. Refer to LG&E's response to Commission Staff's Second Request, Item 1, Electric Tariff, page 160 of 244. Explain the purpose of the revisions made to the Small Business Audit and Direct Install program.

9. Refer to LG&E's response to Commission Staff's Third Request for Information (Staff's Third Request), Item 14(a). Provide a cite to the requirement that

communications between a Distributed Energy Resources equipment and company control systems for all generators over 1 MW in capacity.

10. Refer to LG&E's response to Staff's Third Request, Item 14(b). Also refer to the application, Tab 4, Electric Tariff, page 200 of 204.

a. Since Level 1 interconnections do not require the same level of engineering review as a Level 2 interconnection, explain why the fees should be the same.

b. Provide cost support for the \$100 Level 1 inspection and processing fee.

c. Explain how many times LG&E has had to conduct an impact study related to a Level 1 Application.

11. Refer to Case No. 2023-00404,² which states "[t]he Commission finds that LG&E/KU should incorporate the arguments raised by the Joint Intervenors herein, in regard to updating the other components of the bill credits, and file additional evidence and testimony in its next base rate case." For each avoided cost component, explain how LG&E/KU incorporated the arguments raised by the Joint Intervenors.

12. Refer to LG&E/KU's response to Joint Intervenor's First Request for Information, Item 103. Provide the requested analysis.

13. Refer to Case No. 2023-00404, LG&E/KU's October 31, 2023 tariff filings, Generation and Planning Analysis, October 2023 (October 2023 Planning Analysis),

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 at 24.

page 17; LG&E/KU's response to Commission Staff's First Request for Information, Item 5; and the August 30, 2024 final Order. Using the methodologies approved by the Commission, provide calculations for each of the following components for NM-2 credits:

- a. Ancillary Services Avoided Cost;
- b. Avoided Generation Capacity Avoided Cost;
- c. Avoided Transmission Capacity Avoided Cost;
- d. Avoided Distribution Capacity Avoided Cost;
- e. Avoided Carbon Cost; and
- f. Avoided Environmental Compliance Cost.

14. Refer to Case No. 2023-00404, August 30, 2024 final Order, pages 22-23 and LG&E/KU's response to Commission Staff's First Request for Information, Item 5. For both qualified facility (QF) rates and net-metering-2 (NM-2) rates, provide an update to the avoided cost analysis using a natural gas combined cycle (NGCC) unit that the utility is planning for, currently procuring, or constructing and as the avoided cost benchmark. Include in the updated analysis, the Seasonal Capacity Need as reflected in Case No. 2025-00045.³ In this analysis, explain why LG&E chose the specific NGCC unit as a basis.

15. Refer to the Direct Testimony of Charles Schram, pages 32-34 and Exhibit CRS-6. For avoided energy costs for both QF and NM-2 rates, explain what, if any, changes LG&E/KU made to its methodology or calculations from the methodology approved in Case No. 2023-00404.

³ Case No. 2025-00045, *Electronic Application of Kentucky Utilities Company and Louisville Gas and Electric Company for Certificates of Public Convenience and Necessity and Site Compatibility Certificates*.

16. Refer to Case No. 2020-00350,⁴ September 24, 2021 final Order, page 48 which states “based upon the evidence of record, the Commission finds that LG&E/KU’s proposed methodology for NMS 2 netting period is not fair, just and reasonable, and should be rejected. This is because LG&E/KU’s proposed instantaneous credit for all energy exported on to the grid is inconsistent with the plain language of KRS 278.465(4).”

a. Explain how LG&E changed its netting methodology based on this finding.

b. Explain why LG&E’s current netting methodology is not considered instantaneous.

17. Refer to the Direct Testimony of Michael E. Hornung, page 29, lines 1–29.

a. Confirm that LG&E’s current Local Gas Delivery Service Tariff, Standard Facilities Contribution Rider, Pooling Service – Rider TS-2, and Pooling Service – Rate FT allow customers to provide security in a form other than cash payment.

b. If confirmed, explain why a revision to these tariffs is necessary and explain any potential harm to the customer or LG&E that would result from the customer providing security in the form of a cash payment.

c. If not confirmed, explain why not.

18. Refer to the Direct Testimony of Michael E. Hornung, page 29, lines 4–7, in which it is stated that LG&E is removing cash as a means of providing credit support in the Standard Facility Contribution Rider. Also refer to LG&E’s response to Staff’s Second

⁴ Case No. 2020-00350, *Electronic Application of Louisville Gas and Electric Company for an Adjustment of its Electric and Gas Rates, A Certificate of Public Convenience and Necessity to Deploy Advanced Metering Infrastructure, Approval of Certain Regulatory and Accounting Treatments, and Establishment of a One-Year Surcredit.*

Request, Item 1, Attachment 2, page 82 of 167, which still lists cash prepayment as an acceptable form of credit support. Explain the discrepancy between the testimony and the data request response.

19. Refer to LG&E's response to Staff's Second Request, Item 1, Gas Tariff, page 98–99 of 167. Explain the reasoning for deleting the Business Solutions provision from the tariff.

20. Refer to LG&E's response to Staff's Third Request, Item 8.

a. Explain why the cost to implement the features was approximately double the estimated amount.

b. Explain how these features will be impacted by the proposed technology changes. Include in the response any estimated fee increases.

c. Explain why the costs were approximately two times higher than KU's costs.

21. Refer to LG&E's response to Staff's Third Request, Item 28. In light of the uniformity between the Integrated Resource Plan and this proceeding's load forecast, confirm that the load forecast in Case No. 2025-00045 was not the basis for financial planning in this case.

22. Refer to LG&E's response to Staff's Third Request, Item 33.

a. Provide the projected useful life of Selective Catalytic Reduction (SCR) catalysts.

b. For each unit listed in this response that SCR catalyst(s) replacement is planned, provide the installation date of the catalyst(s).

23. Refer to LG&E's response to Staff's Third Request, Item 77. Explain how installing remote flow equipment at the customer's expense for some, but not all Rate FT customers, does not violate KRS 278.180(1).

24. Refer to LG&E's response to Staff's Third Request, Item 34. Explain why the longer-term goal of TSIP could not be achieved in the period of 2032-2037.

25. Refer to LG&E's response to Staff's Third Request, Item 36. Provide the justification for LG&E increasing wages from 7 to 11 percent for distribution line tech employees when the labor rates for distribution line tech employees have increased, on average, by 4.4 percent from 2020-2025.

26. Refer to LG&E's response to the Attorney General's First Request for Information, Item 49. Refer also to LG&E's response to Staff's Second Request, Item 95. Explain whether LG&E anticipates meter contractor expense to continue following the anticipated completion date of the advanced metering infrastructure project to be 2025.

27. Refer to the Direct Testimony of Shannon Montgomery, page 16, lines 10-12. Explain how much of this reduction was the result of the deviations from regulations related to meters and meter testing granted in the final Order in Case No. 2020-00349/350.

28. Refer to the Direct Testimony of Shannon Montgomery, page 17, lines 18-21. Explain how LG&E intends to make customers aware of these two opportunities to explore saving on their bill.

29. Refer to LG&E's response Staff's Second Request, Item 35.

a. Explain whether the 6 CP method has been accepted methodology by the Commission. Include in the response whether LG&E has ever proposed this methodology before. For the response, include full case citations.

b. Provide the results of the cost of service study when using 12 CP methodology in place of 6 CP.

c. Provide examples of any other utility that utilizes the 6 CP method in Kentucky for its cost of service study.

d. Provide examples of any parent company or other subsidiary of the parent company that utilizes the 6 CP method.

30. Refer to LG&E's response to Staff's Third Request, Item 23.

a. Confirm that rates were calculated to reach the cost of service study supported revenue increase for each rate class and not based upon the cost-based rates supported by the study.

b. If confirmed, explain the rationale behind the decision. Additionally, explain why LG&E chose not to propose rates based upon the cost-based rate for each rate class.

31. Provide a detailed table with the following for LG&E Electric:

a. Current class revenue and rates.

b. Proposed class revenue and rates.

c. Cost of service study class revenue and rates.


32. Provide a detailed table with the following for LG&E Electric:

a. Current class rate of return on rate base.

b. Proposed class rate of return on rate base.

33. Provide a detailed table with the following for LG&E Electric:
- a. Current class share of revenue in dollars and percentage.
 - b. Current class share of energy usage in kWhs and percentage.
 - c. Proposed class share of revenue in dollars and percentage.
 - d. Proposed class share of energy in kWhs and percentage.

34. Refer to the Direct Testimony of Richard A. Baudino in which the Attorney General recommended a decrease to LG&E's cost of debt due to an actual debt issuance securing a lower interest rate than the projected interest rate. Confirm whether the referenced debt issuance occurred. If confirmed, provide the date of the debt issuance, the actual principal amount, and the actual interest rate that was secured.



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DATED **SEP 10 2025** _____

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