

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC JOINT APPLICATION OF)	
KENTUCKY UTILITIES COMPANY AND)	CASE NO.
LOUISVILLE GAS AND ELECTRIC COMPANY)	2026-00077
FOR APPROVAL OF MERGER)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO ATTORNEY GENERAL OF THE COMMONWEALTH OF KENTUCKY, BY AND
THROUGH THE OFFICE OF RATE INTERVENTION

Attorney General of the Commonwealth of Kentucky, by and through the Office of Rate Intervention (Attorney General), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due June 24, 2026. The Commission directs Attorney General 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.

Attorney General shall make timely amendment to any prior response if Attorney General 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 Attorney General fails or refuses to furnish all or part of the requested information, Attorney General 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 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 3, lines 21-22. Explain the basis for this statement. Include in the explanation citations to any supporting documentation, statutes or prior Commission Orders to support this statement.

2. Refer to Kollen Direct Testimony, pages 17–18. Explain how the \$5 million in annual base revenue recovery was calculated.

3. Refer to Kollen Direct Testimony, pages 10–11.

a. Define “actual merger savings” for the purpose of the recommended offset. As part of the explanation, include the data sources and recommended calculation methodology used to quantify the savings as defined.

b. State what period following any approved merger should be used to calculate any “actual merger savings”.

4. Refer to Kollen Direct Testimony, page 12. Provide the information relied on for the statement that “in general, KU average customer bills will be less and LG&E average customer bills will be more after the rates are reset based on a single set of combined Company rates, all else equal.” Include as part of the response each affected customer class for each Kentucky Utilities Company (KU) and Louisville Gas and Electric Company (LG&E) and whether the LG&E or KU rate class will experience a rate increase or decrease and the magnitude of the change.

5. Refer to Kollen Direct Testimony, page 12. State whether different rates of unification for different rate classes is appropriate when considering the magnitude of any rate change that may result from the merger moving forward.

Linda Bridwell RP

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DATED **JUN 16 2026**

cc: Parties of Record

Case No. 2026-00077

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