

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

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JUN 16 2011

PUBLIC SERVICE  
COMMISSION

**In the Matter of:**

**APPLICATION OF KENTUCKY UTILITIES )**  
**FOR CERTIFICATES OF PUBLIC CONVENIENCE )**  
**AND NECESSITY AND APPROVAL OF ITS 2011 ) CASE NO. 2011-00161**  
**COMPLIANCE PLAN FOR RECOVERY )**  
**BY ENVIRONMENTAL SURCHARGE )**

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**PETITION OF RICK CLEWETT, RAYMOND BARRY, SIERRA CLUB, AND THE  
NATURAL RESOURCES DEFENSE COUNCIL FOR FULL INTERVENTION**

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Pursuant to K.R.S. § 278.310 and 807 K.A.R. 5:001 § 3(8), Rick Clewett, Raymond Barry, Sierra Club, and the Natural Resources Defense Council (“NRDC”) (collectively “Movants”), petition the Commission for full intervention in this case. The Movants have a wealth of knowledge and experience in a wide variety of the complex and rapidly changing issues which impact Kentucky Utilities’ (“KU”) application for Certificates of Public Convenience and Necessity, and interests in this proceeding that are not adequately represented by any other party to the proceeding. The Movants seek full intervention to help to ensure that any Certificates of Public Convenience and Necessity are approved only if they represent the best option to satisfy their members’ interest in low cost energy service.

On June 1, 2011, KU filed an application for Certificates of Public Convenience and Necessity for the installation of pollution control equipment on the E.W. Brown (“Brown”) and the Ghent power plants pursuant to the Public Service Commission’s authority under the Kentucky Revised Statutes and Kentucky Administrative Code to regulate the electric utilities in

the state. KRS § 278.020(1), and 807 KAR 5:001, Sections 8 and 9. KU seeks approval for the retrofit work so that it can recover the full costs of installing this pollution control equipment, which it estimates at \$1.1 billion.<sup>1</sup> KU needs to install this equipment because the Brown and Ghent power plants do not comply with existing and expected federal Clean Air Act requirements under the proposed Clean Air Transport and Hazardous Air Pollutant rules and the federal Resource Conservation and Recovery Act and because of current EPA enforcement actions.<sup>2</sup>

In order to comply with the Clean Air Act, the proposed environmental controls projects (“Projects”) would involve extensive work to retrofit the plants. For particulate matter and mercury abatement, KU proposes to install baghouses to capture particulate matter, a Powdered Activated Carbon (“PAC”) injection system to capture mercury, and a lime injection system to protect the baghouses from the corrosive effects of sulfuric acid mist at the three units at Brown and four units at Ghent plants.<sup>3</sup> For NOx abatement, KU proposes to modify various systems at Ghent Units 1, 3, and 4 to expand the operating range of the Selective Catalytic Converter.<sup>4</sup> For the storage of coal combustion residues, KU proposes to convert the Brown main ash pond to a dry-storage landfill.<sup>5</sup>

The alternative compliance path for KU is to retire some or all of the Brown and/or Ghent units and replace the capacity, if such capacity is actually needed.<sup>6</sup> KU purports to have evaluated the revenue requirements of these options and determined that retrofitting the Brown

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<sup>1</sup> Application of KU for Certificates of Public Convenience and Necessity and Approval of Its 2011 Compliance Plan for Recovery by Environmental Surcharge (hereafter KU Application) at pg. 7.

<sup>2</sup> KU Application at pgs. 1, 3-4, 6; *see also* Direct Testimony of John N. Voyles, Jr. at 2, 5-20.

<sup>3</sup> KU Application at pg 3; *see also* Direct Testimony of John N. Voyles, Jr. at 10-14.

<sup>4</sup> KU Application at pg 7; *see also* Direct Testimony of John N. Voyles, Jr. at 12.

<sup>5</sup> KU Application at pg 6-7; *see also* Direct Testimony of John N. Voyles, Jr. at 7-8.

<sup>6</sup> *See, e.g.*, Direct Testimony of Charles R. Schram at 4.

and Ghent plants is the most cost-effective means of complying with existing and expected law,<sup>7</sup> but the Company never disclosed what replacement alternatives were considered although it appears that it only considered natural gas.<sup>8</sup>

This proceeding comes at a critical juncture for KU. Existing or expected federal Clean Air Act, Clean Water Act, and Resource Conservation and Recovery Act regulations will require KU to either install pollution controls on coal units or to retire such units. Technological advances and changes in market conditions have made a larger suite of both supply- and demand-side options available for KU to provide service to their customers. Moreover, growing awareness of the public health, environmental, and economic impacts of energy production have increased the importance of the pursuit of energy efficiency and renewable energy resources from both a cost and environmental perspective. For the Commission, energy efficiency and conservation are paramount considerations for determining the rates and services of utilities and their importance will continue to grow “as more constraints are . . . placed on utilities that rely significantly on coal-fired generation.”<sup>9</sup> In short, KU faces a new reality involving a growing set of costs to its existing generation fleet, an expanding set of options for how to service its customers, and an increasingly complex set of factors relevant to identifying the lowest cost mix of supply- and demand-side resources for meeting its customers’ needs. The organizational Movants, on behalf of their members, have gained significant expertise on these issues in proceedings throughout the country, and seek to bring such expertise to this proceeding.

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<sup>7</sup> KU Application at 4; Direct Testimony of Charles R. Schram at 5.

<sup>8</sup> See Direct Testimony of Charles R. Schram at 5 (the only alternative mentioned in Mr. Schram’s Direct Testimony is natural gas. He states, “[t]he replacement generation technology, if required, is expected to be a natural gas-fired combined cycle combustion turbine.”).

<sup>9</sup> *In the Matter of: Joint Application of PPL Corporation, E.ON AG, E.ON US Investments Corp., E.ON U.S. LLC, Louisville Gas and Electric Company, and Kentucky Utilities Company for Approval of an Acquisition of Ownership and Control of Utilities* (Case No. 2010-00204) Order, Sept. 30, 2010 at 20 (noting that the Commission stated its support for energy-efficiency programs in a report “to the Kentucky General Assembly in July 2008 pursuant to Section 50 of the 2007 Energy Act”).

## **I. THE MOVANTS**

Movants seek full intervention in order to ensure that their interests in lower cost and cleaner energy options are fully represented, and to bring to this proceeding their expertise in developing plans for providing a lower cost and cleaner energy future. Movants Rick Clewett and Raymond Barry are each KU customers, are long time Sierra Club members, and have a deep interest in seeing KU transform to meet the new reality in a way that is both low cost and cleaner. Their addresses are as follows:

Rick Clewett  
225 Aberdeen Drive  
Lexington, Kentucky 40517

Raymond Barry  
3415 Snaffle Road  
Lexington, Kentucky 40513

Sierra Club is one of the oldest conservation groups in the country with over 625,000 members nationally in sixty-four chapters in all fifty states including the District of Columbia and Puerto Rico. Sierra Club has over 5,000 members in Kentucky, which are part of the Cumberland Chapter. This chapter has five groups including a Northern Kentucky group and a Bluegrass Group. The Cumberland Chapter's address is:

Sierra Club  
Cumberland Chapter  
P.O. Box 1368  
Lexington, Kentucky 40588-1368

The Natural Resources Defense Council ("NRDC") is a national non-profit environmental organization, headquartered in New York, that has worked for its 40-year history to, among other things, promote energy efficiency and renewable energy sources, and protect air and water quality. NRDC has 2,942 members in Kentucky, many of whom reside in KU's

service areas and/or live near KU's existing power generating facilities. NRDC has a Midwest Office, which address is:

Natural Resources Defense Council  
2 N. Riverside Plaza, Suite 2250  
Chicago, Illinois 60660

## **II. LEGAL BACKGROUND**

The Commission's regulations regarding intervention provide that a person may seek leave to intervene in a Commission proceeding and, upon timely motion:

If the commission determines that a person has a special interest in the proceeding which is not otherwise adequately represented **or** that full intervention by [the] party is likely to present issues or to develop facts that assist the commission in fully considering the matter without unduly complicating or disrupting the proceedings, such person shall be granted full intervention.

807 K.A.R. 5:001 § 3(8)(emphasis added). In other words, the Commission must grant full intervention if Movants either have interests in this proceeding that are not adequately represented or they offer expertise that would assist in evaluation of the application for Public Convenience and Necessity. As explained below, Movants satisfy both standards for intervention.

Movants are seeking intervention in a Certificates of Public Convenience and Necessity proceeding that is governed by KRS § 278.020(1).<sup>10</sup> Pursuant to that statute, KU cannot install equipment until it receives a certificate that "public convenience and necessity require the service or construction." KRS § 278.020(1). The Commission has the right to "issue or refuse to issue the certificate, or issue it in part and refuse it in part." *Id.* KU is also seeking to recover \$1.1 billion from the ratepayers for these projects pursuant to KRS § 278.183.<sup>11</sup> This proceeding

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<sup>10</sup> KU Application at 1.

<sup>11</sup> KU Application at 1, 7.

is intended to evaluate the reasonableness of KU's submission and to identify possible improvements or less costly alternatives.

### **III. THE COMMISSION SHOULD GRANT MOVANTS FULL INTERVENTION**

#### **A. This Petition to Intervene is Timely Filed**

This request to intervene is timely. KU filed its application for Certificates of Public Convenience and Necessity for the installation of pollution control equipment on the Mill Creek and Trimble power plants on June 1, 2011. On June 14, 2011, the Commission issued an order finding the KU application deficient and requested that KU correct this deficiency within fifteen days. KU has not filed a corrected application and the Commission has not yet issued a scheduling order in this proceeding. Movants have submitted this Petition shortly after KU filed its deficient application. As such, this Petition is timely.

#### **B. Movants Will Present Issues and Develop Facts That Will Assist the Commission in Fully Considering the Matter Without Unduly Complicating or Disrupting the Proceedings.**

The Commission should grant Movants full intervention because they are "likely to present issues or to develop facts that assist the commission in fully considering the matter without unduly complicating or disrupting the proceedings." 807 K.A.R. 5:001 § 3(8). This proceeding involves complex questions regarding whether installing pollution control equipment on a number of existing coal-fired power plant units is a public convenience or necessity. According to KU, retrofitting these plants is the most cost effective option of the alternatives it evaluated.<sup>12</sup> However, KU's application does not list what other alternatives were considered, nor provide information necessary to evaluate that conclusion. In fact, it appears that the only

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<sup>12</sup> KU Application at 4; Direct Testimony of Charles R. Schram at 5.

technology considered was a natural gas-fired combined cycle plant.<sup>13</sup> It is not even clear which natural gas combined cycle alternative KU considered. Using natural gas fuel as a fuel choice presents a number of alternatives that KU should have considered, including building a new natural gas combined cycle facility, repowering existing units with natural gas, purchasing an existing natural gas combined cycle plant, or purchasing unused capacity from an existing natural gas plant. As parties to this proceeding, the Movants will ensure that the appropriate suites of alternatives were examined, such as replacing the capacity with natural gas, renewable energy sources, and/or efficiency.<sup>14</sup> Movants bring to this docket their unique perspective and experience in advancing technical and regulatory solutions to increasing renewable and demand side energy sources to all regions of the country.

Movants Sierra Club and NRDC have developed expertise that encompasses a broad range of environmental and energy concerns that fully complement the myriad of technical and policy issues parties will face in this proceeding. In particular, NRDC and Sierra Club's staff and consultants have extensive experience in resource planning, analyzing the potential for cost effective energy efficiency, and in the laws and regulations regulating energy production. NRDC and Sierra Club have jointly or individually intervened and/or provided testimony on these issues in a multitude of similar proceedings in a number of states including Arkansas, Arizona, California, Colorado, Florida, Illinois, Iowa, Louisiana, Michigan, Mississippi, Missouri, New York, New Jersey, Nevada, Ohio, Oklahoma, Oregon, South Carolina, Utah,

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<sup>13</sup> See Direct Testimony of Charles R. Schram at 5 (the only alternative mentioned in Mr. Schram's Direct Testimony is natural gas. He states, "[t]he replacement generation technology, if required, is expected to be a natural gas-fired combined cycle combustion turbine.").

<sup>14</sup> "[A]s more constraints are . . . placed on utilities that rely significantly on coal-fired generation," this is an important issue for the Commission to consider. See, e.g., *In the Matter of: Joint Application of PPL Corporation, E.ON AG, E.ON US Investments Corp., E.ON U.S. LLC, Louisville Gas and Electric Company, and Kentucky Utilities Company for Approval of an Acquisition of Ownership and Control of Utilities* (Case No. 2010-00204) Order, Sept. 30, 2010 at 20 (noting that the Commission stated its support for energy-efficiency programs in a report "to the Kentucky General Assembly in July 2008 pursuant to Section 50 of the 2007 Energy Act").

Wisconsin, and Wyoming. NRDC and Sierra Club have also regularly presented testimony before the U.S. Congress and various state legislatures on issues related to the electric utility industry, including energy efficiency, renewable energy, and coal generation.

Movants are aware of past holdings by the Commission that it does not make decisions about environmental regulations.<sup>15</sup> But the Movants are not seeking intervention to opine about the environmental impacts of KU's coal plants and its environmental compliance plans. Instead, Movants are seeking to present testimony regarding whether the compliance plan proposed by KU is the least cost option in light of the full range of regulatory, capital, operating, and fuel costs that KU's plants face, whatever need exists, and the increasing availability of low cost energy efficiency and renewable energy alternatives. The Commission cannot reach a logical determination on the reasonableness of KU's request to recoup \$1.1 billion from its ratepayers to pay for environmental controls without evaluating each of those issues. As such, Movants are seeking intervention to address topics that are directly at issue in this proceeding.

First; it is premature for the Commission to determine if these pollution upgrades are a public convenience or necessity. KU concedes the Hazardous Air Pollutant and Clean Air Transport Rules under the Clean Air Act and Coal Combustion Residuals Rule under the Resource Conservation Recovery Act are not finalized.<sup>16</sup> Without these final rules, KU has no way of knowing whether its premature retrofit work will meet federal requirements. Nonetheless, KU wants authority to gamble on the installation of pollution controls that it hopes will meet (or be a cost effective foundation for meeting) EPA's final requirements for the Hazardous Air Pollutant, Clean Air Transport, and Coal Combustion Residuals Rules. This gamble violates the principle that the utility property should be used and useful for public convenience and necessity

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<sup>15</sup> *In the Matter of The 2008 Joint Integrated Resource Plan of Louisville Gas and Electric Company and Kentucky Utilities Company* (Case No. 2008-148) Order, July 18, 2008 at 5-6.

<sup>16</sup> KU Application at 3, 6, Direct Testimony of Gary H. Revlett at 2, 4, 13-14, 15-18.



at the time of rate consideration and, more importantly, is imprudent. If KU is wrong, it will have to go back and expend additional resources to meet EPA requirements and may have acted prematurely.

Second, if the Commission decides that it is not premature for the Commission to determine if these pollution upgrades are a public convenience or necessity, it must examine the entire suite of emerging federal regulations in order to accurately determine what is the least cost option. In its application, KU insists that it must address certain emerging federal regulations now. However, it has completely failed considered a number of emerging federal requirements that will require additional expenditures on control technology (emerging retrofits) or may lead to plants being repowered or retired. In this way, KU is asking ratepayers to fund piecemeal work that it could do more efficiently or not at all once KU has a better understanding of the full suite of federal requirements. KU has stated that retrofitting these plants is the most cost effective compliance option.<sup>17</sup> However, since KU has only analyzed a subset of the expected regulatory obligations, the accuracy of that conclusion is doubtful. Movants want to ensure that the Commission evaluates the full regulatory and capital costs facing these KU plants, including the expected regulation of greenhouse gas emissions,<sup>18</sup> so it can accurately determine the least cost option for moving forward. Movants are not advocating any particular resource mix or alternative at this time, and instead simply endorse a robust examination of the comparative costs and benefits of viable options once the full suite of emerging federal requirements are considered.

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<sup>17</sup> KU Application at 4; Direct Testimony of Charles R. Schram at 5.

<sup>18</sup> EPA entered into a settlement agreement with a number of states, Sierra Club and NRDC, which establishes a schedule for promulgating a rule to regulate greenhouse gas emissions from existing sources. EPA will finalize this rule by May 26, 2012. The Commission can also find a copy of this settlement agreement and the proposed regulatory schedule at <http://www.epa.gov/airquality/ghgsettlement.html>.

Through full intervention, NRDC and Sierra Club, on behalf of their members including the individual Movants, will use their expertise and consultants to provide current data and analysis to investigate the adequacy of KU's proposed compliance plan, explore additional alternatives for replacing capacity, investigate the adequacy of KU's cost analyses, and present evidence and argument in support of energy efficiency, renewable energy resources, and other low carbon generation technologies if they represent reasonable and prudent alternatives for KU to pursue.

KU's application deals with complicated topics. However, the Movants helping the Commission to explore many of the assumptions and inputs will not unduly complicate the matter. Rather, it will allow for a more robust examination to ensure that the Commission approves the least cost alternative for KU. Finally, the Movants are represented by experienced counsel and will comply with all deadlines in the proceeding established by the Commission. As such, Movants' participation will not disrupt this proceeding.

**C. Movants Have Special Interests in This Proceeding Which Are Not Adequately Represented.**

As noted above, 807 K.A.R. 5:001 § 3(8) provides two alternative bases for granting full intervention. Parties either need to have a special interest not adequately represented or present issues and facts that will help the Commission fully consider the matter. As explained in Section III.B., above, the Movants will present issues and facts that will help the Commission fully consider the matter. Therefore, the Commission can grant full intervention on that basis alone and need not consider the Movants' special interest. Nevertheless, as explained below, the Movants also have special interests that are not adequately represented.

The individual Movants are all customers and rate payers of KU. As such, they help fund KU's operations, and the Commission's decision about whether to grant the Certificates of

Convenience and Necessity for installation of pollution control equipment and subsequent surcharges for \$1.1 billion will directly impact their bills. In addition, the individual Movants live within the KU service territory and, therefore, are impacted by the economic, public health, and environmental effects of the resource decisions that KU makes. Organizational Movants NRDC and Sierra Club each have members who are customers and ratepayers of KU and, therefore, have the same interests as the individual Movants. In addition, Movants' desire to promote energy efficiency, peak demand reduction, renewable energy, and cost-effective low carbon energy sources in Kentucky is directly related to the issues of this proceeding, in which KU has proposed and the parties are evaluating whether to install pollution control equipment on existing plants or pursue a different options.

Movants' interests are not adequately represented by any of the parties in the proceeding, as none of the other parties can adequately represent the organizational Movants' interests as national organizations that are interested in costs associated with emerging federal regulations compliance is not piecemealed, and in the promotion of energy efficiency, renewable energy, and other low carbon generation sources as the most reasonable and cost effective way for KU to maintain essential electric services and meet emerging federal regulatory requirements.

The Attorney General cannot adequately represent the Movants' interest. The Attorney General has the unenviable task of representing all consumers and all of their diverse interests, even if some of the interests are diametrically opposed to each other. In fact, courts have "repeatedly held that private companies can intervene on the side of the government, even if some of their interests converge." *See, e.g., Hardin v. Jackson*, 600 F. Supp. 2d 13, 16 (D.D.C. 2009). That is because "government entities are usually charged with representing the interests of the American people, whereas aspiring intervenors, like the [Movants] here, are dedicated to

representing their personal interests or the interests of their members or members' businesses.” *County of San Miguel, Colo. v. MacDonald*, 244 F.R.D. 36, 48 (D.D.C. 2007); *Purnell v. Akron*, *Purnell v. Akron*, 925 F.2d 941, 949 (6th Cir. 1991) (granting intervention in a wrongful death suit when intervenors' interests were personal and narrower than the current defendants); *Fund for Animals, Inc. v. Norton*, 322 F.3d 728, 737 (D.C. Cir. 2003) (movant satisfied its burden where it sought to protect interests that were “more narrow and parochial” than the government's interests); *Am. Horse Prot. Ass'n v. Veneman*, 200 F.R.D. 153, 159 (D.D.C. 2001) (granting intervention of right where intervenors had “more narrow interests and concerns” than the government entity); *Jansen v. Cincinnati*, 904 F.2d 336, 343 (6th Cir. 1990) (granting intervention when intervenors agreed with the government's conclusion but differed in their rationale); *Southern Utah Wilderness v. Norton*, 2002 WL 32617198, at \*5 (D.D.C. June 28, 2002) (concluding that government entity may not adequately represent specific interests of private entity). While the Attorney General is tasked with representing the overall, and sometimes conflicting, public interest(s) in this proceeding, the Movants have a more narrow interest and concern in ensuring that compliance with emerging federal regulations is not piecemealed and complete costs associated with each alternative are adequately presented to the Commission.

Thus, the Attorney General may not be able to represent the Movants' interest, or at least not as forcefully, because of the Attorney General's obligation to represent all consumers. The Attorney General has previously encouraged the Commission to allow public interest groups to intervene when the “Attorney General is not capable of providing the same perspective and representation” as a public interest group.<sup>19</sup> Moreover, the Commission cannot interpret its

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<sup>19</sup> See *In the Matter of: Application of Columbia Gas of Kentucky, Inc. for an Adjustment of Rates for Gas Service* (Case No. 2009-00141), Attorney General's Comments Regarding the Motion of Stand Energy Corporation

regulations to provide that the mere fact that the Attorney General intervened in this case to mean that the public interest Movants' interest are adequately represented, for that is the situation in every case. Such an interpretation would render the intervention provision for parties other than the Attorney General superfluous, which would run contrary to the rules of statutory and regulatory interpretation. *See Lexington-Fayette Urban County Government v. Johnson*, 280 S.W.3d 31, 34 (Ky. 2009), *University of Cumberlands v. Pennybacker*, 308 S.W.3d 668, 683-84 (Ky. 2010).

Finally, neither the Commission staff nor the Attorney General's office will marshal the same level of environmental expertise, if any, as Movants with regard to emerging federal regulatory requirements and what pollution control upgrades utilities will need to make to meet those obligations. As such Movants are uniquely positioned to share their expertise with the Commission to ensure that it does not authorize the proposed Certificates of Convenience and Necessity and accompanying \$1.1 billion in surcharges only to discover that another billion dollar investment is required to meet additional environmental compliance obligations. Finally, allowing Movants to intervene will serve the public interest because no other party to this proceeding has the capacity or the incentive to assure that Movants' concerns are addressed.

#### **IV. CONCLUSION**

For the foregoing reasons, the Movants respectfully request full intervention in this matter.

Respectfully submitted,



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Customer Group to Intervene, June 17, 2009 at 1 (arguing that the Commission should grant the SEC Customer Group's motion to intervene).

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Dated: June 16, 2011

## CERTIFICATE OF SERVICE

I certify that I mailed a copy of this Petition For Full Intervention by first class mail on June 16, 2011 on the following:

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