Steven L. Beshear Governor

Leonard K. Peters Secretary Energy and Environment Cabinet



Commonwealth of Kentucky
Public Service Commission
211 Sower Blvd.
P.O. Box 615

Frankfort, Kentucky 40602-0615 Telephone: (502) 564-3940 Fax: (502) 564-3460 psc.ky.gov David L. Armstrong Chairman

James W. Gardner Vice Chairman

December 14, 2011

PARTIES OF RECORD

Re: Case No. 2011-00161

Attached is a copy of a memorandum which is being filed in the record of the above-referenced case. If you have any comments you would like to make regarding the contents of the memorandum concerning the November 18, 2011 technical conference, please do so within five days of receipt of this letter. If you have any questions, please contact Faith Burns of the Commission staff at 502/564-3940, Extension 235.

kecutive Director

Attachments

cc: Parties of record



INTRA-AGENCY MEMORANDUM

KENTUCKY PUBLIC SERVICE COMMISSION

TO:

Case File - Case No. 2011-00161

FROM:

Faith B. Burns, Staff Attorney

DATE:

December 14, 2011

RE:

Technical Conference of November 18, 2011

On November 16, 2011, Kentucky Utilities Company ("KU") and Louisville Gas and Electric Company requested a technical conference with Commission Staff and the parties to be held on November 18, 2011 at 10:30 a.m. for the purpose of reviewing the changes to the proposed Environmental Cost Recovery Surcharge monthly forms to reflect some of the terms of the Settlement Agreement, Stipulation, and Recommendation ("Settlement Agreement").

The technical conference was conducted as scheduled. A list of attendees is attached. Also attached is a copy of KU's proposed environmental cost recovery surcharge tariff to conform to the terms of the Settlement Agreement; and KU's proposed Environmental Surcharge ("ES") Forms to conform to the Terms of the Settlement Agreement.

Attachments:

Sign-in Sheet Proposed Tariff Proposed ES Forms

¹ Dennis Howard, Larry Cook, Iris Skidmore, and David Barberie appeared telephonically.

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of	In t	าe ∣	Ma	tter	OT:
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APPLICATION OF KENTUCKY UTILITIES COMPANY FOR CERTIFICATES OF PUBLIC CONVENIENCE AND NECESSITY AND APPROVAL OF ITS 2011 COMPLIANCE PLAN FOR RECOVERY BY ENVIRONMENTAL SURCHARGE))))	CASE NO. 2011-00161
APPLICATION OF LOUISVILLE GAS AND ELECTRIC COMPANY FOR CERTIFICATES OF PUBLIC CONVENIENCE AND NECESSITY AND APPROVAL OF ITS 2011 COMPLIANCE PLAN FOR RECOVERY BY ENVIRONMENTAL SURCHARGE))))	CASE NO. 2011-00162

November 18, 2011

Please sign in:

NAME

REPRESENTING

PSC-CETAC

MILE KONTZ

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PSC-FA

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PSC-FA

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Case No. 2011-00161 Case No. 2011-00162 November 18, 2011

Kima Coy Rice Eng. Feresdoon Gorilan PSC-Engineering Dennis Howard LAREN Cook AG LAREN Cook AG LAUR BARBERIE LFUCG	NAME	REPRESENTING
Kimma Coly Fereydoon Garilian PSC-Engineering DENNIS HOWARD LARRY COOK AG LARRY COOK AG LARRY SKIDMORE CAC	Jack Po, Pourel	PSC-Lohal
Ferefdoon Garisian PSC-Engineering DENNIS HOWARD AG LARRY COOK AG LRIS SKIDMORE CAC		PSC-Eny.
DENNIS HOWARD AF LARRY COOK AG IRIS SKIDMORE CAC	Fereydoon Gorsian	
LARRY COOK AG IRIS SKIDMORE CAC	DENNIS HOWARD	
	•	AG
	IRIS SKIDMORE	CAC
	•	LFUCG
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Kentucky Utilities Company

P.S.C. No. 15, First Revision of Original Sheet No. 87 Canceling P.S.C. No. 15, Original Sheet No. 87

Adjustment Clause ECR	
Environmental Cost Recovery Surcharge	
APPLICABLE In all territory served.	
AVAILABILITY OF SERVICE This schedule is mandatory to all Standard Electric Rate Schedules listed in Section 1 of the General Index except CTAC and Special Charges, all Pilot Programs listed in Section 3 of the General Index, and the FAC and DSM Adjustment Clauses. Standard Electric Rate Schedules subject to this schedule are divided into Group 1 or Group 2 as follows: Group 1: Rate Schedules RS; VFD; AES; ST.LT; P.O.LT.; DSK; LE; TE; and Pilot Program LEV. Group 2: Rate Schedules GS; PS; TODS; TODP; RTS; and FLS. Prior to billings for the first billing cycle in March 2012 (cycle beginning February	T T
29, 2012), all rate schedules noted above will be included in Group 1 for purposes of determining and applying the Environmental Surcharge Billing Factor.	↓
RATE	
The monthly billing amount under each of the schedules to which this mechanism is applicable, shall be increased or decreased by a percentage factor calculated in accordance with the following formula.	Deleted: including the fuel clause and demand-side management cost recovery mechanisms
<u>Group</u> Environmental Surcharge Billing Factor = Group E(m) / Group R(m)	Deleted: Jurisdictional
As set forth below, <u>Group E(m)</u> is the <u>sum of Jurisdictional E(m)</u> of each approved environmental compliance plan revenue requirement of environmental compliance costs for the current expense	Deleted: jurisdictional total
month allocated to each of Group 1 and Group 2. Group R(m) for Group 1 is the 12-month average revenue for the current expense and for Group 2 it is the 12-month average non-fuel revenue for the current expense month.	T Deleted: and T T
DEFINITIONS	
 For all Plans, E(m) = [(RB/12) (ROR + (ROR – DR) (TR / (1 – TR))] + OE – BAS + BR a) RB is the Total Environmental Compliance Rate Base. b) ROR is the Rate of Return on Environmental Compliance Rate Base, designated as the overall rate of return [cost of short-term debt, long-term debt, preferred stock, and common equity]. 	
c) DR is the Debt Rate [cost of short-term debt, and long-term debt].	T Deleted: ,
 d) TR is the Composite Federal and State Income Tax Rate. e) OE is the Operating Expenses [Depreciation and Amortization Expense, Property Taxes, Emission Allowance Expense, and O&M expense adjusted for the Average Month 	
Expense already included in existing rates]. <u>OE includes operation and maintenance</u> expense recovery authorized by the K.P.S.C. in all approved ECR Plan proceedings.	T Deleted: I
 f) BAS is the total proceeds from by-product and allowance sales <u>applicable to the pre-2011-Plans only.</u> g) BR is the operation and maintenance expenses, and/or revenues if applicable, 	T
associated with Beneficial Reuse <u>applicable to the pre-2011 Plans only.</u> h) Plans are the environmental surcharge compliance plans submitted to and approved by	Т
the Kentucky Public Service Commission pursuant to KRS 278.183.	
	Deleted: 1
Date of Issue: June 1, 2011 Date Effective: December <u>16,</u> 2011	

Date Effective: December <u>16</u>, 2011
Issued By: Lonnie E. Bellar, Vice President, State Regulation and Rates, Lexington, Kentucky

Kentucky Utilities Company

P.S.C. No. 15, Original Sheet No. 87.1

Adjustment Clause **ECR Environmental Cost Recovery Surcharge** 2) Total E(m) (sum of each approved environmental compliance plan revenue requirement) is multiplied by the Jurisdictional Allocation Ratio to arrive at Jurisdictional E(m). Jurisdictional Deleted: Factor E(m) is multiplied by the Group 1 and Group 2 percentages of total revenues to arrive at Group 1 E(m) and Group 2 E(m). Each individual Group E(m) is reduced by current expense Deleted: and month ECR revenue collected through base rates of each Rate Schedule included in the applicable Group to arrive at the Net Group 1 E(m) and Net Group 2 E(m), Deleted: Jurisdictional Deleted: and Net Group 2 E(m) The <u>Group 1</u> R(m) is the average of total <u>Group 1</u> monthly base revenue for the 12 months ending with the current expense month. Base revenue includes the customer, energy, and Deleted: revenue lighting charges for each rate schedule included in Group 1 to which this mechanism is T Deleted: for the Company applicable and automatic adjustment clause revenues for the Fuel Adjustment Clause and Deleted: demand the Demand-Side Management Cost Recovery Mechanism as applicable for each rate schedule in Group 1. T 4) The Group 2 R(m) is the average of total Group 2 monthly base non-fuel revenue for the 12 Т months ending with the current expense month. Base non-fuel revenue includes the customer, non-fuel energy, and demand charges for each rate schedule included in Group 2 to which this mechanism is applicable and automatic adjustment clause revenues for the Demand-Side Management Cost Recovery Mechanism as applicable for each rate schedule in Group 2. Non-fuel energy is equal to the tariff energy rate for each rate schedule included in Group 2 less the base fuel factor as defined on Sheet No. 85.1, Paragraph 6. Current expense month (m) shall be the second month preceding the month in which the Environmental Surcharge is billed. Deleted: 1

Date of Issue: June 1, 2011 Date Effective: December <u>16</u>, 2011

Issued By: Lonnie E. Bellar, Vice President, State Regulation and Rates, Lexington, Kentucky

ES FORM 1.00

KENTUCKY UTILITIES COMPANY ENVIRONMENTAL SURCHARGE REPORT

Net Group E(m) and Group Environmental Surcharge Billing Factors For the Expense Month of

GROUP I (Total Revenue)	
Net Group $E(m) = Group E(m)$ less Expense Month Revenue	
Collected Through Base Rates ES Form 1.10, line 18	:
· ·	
Group 1 ES Billing Factor ES Form 1.10, line 20	;
20 10 m 110, m 20	
GROUP 2 (Net Revenue)	
Net Group E(m) = Group E(m) less Expense Month Revenue	
Collected Through Base Rates ES Form 1.10, line 18	;
Group 2 ES Billing Factor ES Form 1.10, line 20	;
Effective Date for Billing:	
Submitted by:	
	-
Title: Director, Rates	
2	
Date Submitted:	
Duce Challiton	

ES FORM 1.10

KENTUCKY UTILITIES COMPANY ENVIRONMENTAL SURCHARGE REPORT

Calculation of Total E(m) and Group Surcharge Billing Factors

For the Expense Month of

Calculation of Total E(m)

E(m) = [(RB / 12) (ROR+(RO	OR -DR)(TR/(1-TR)))] + OE - BAS + BR, where
RB	=	Environmental Compliance Rate Base
ROR	=	Rate of Return on the Environmental Compliance Rate Base
DR	=	Debt Rate (both short-term and long-term debt)
TR	=	Composite Federal & State Income Tax Rate
OE	=	Pollution Control Operating Expenses
BAS	=	Total Proceeds from By-Product and Allowance Sales
BR	===	Beneficial Reuse Operating Expenses

		Pre-2011 Environmental Compliance Plans	2011 Environmental Compliance Plans
(1) RB		=	
(2) RB / 12		=	
(3) (ROR + (ROR	- DR) (TR / (1 - TR)))	enter Aller	
(4) OE		Maria.	
(5) BAS		==	Not Applicable
(6) BR		=	Not Applicable
(7) E(m)	(2) x (3) + (4) · (5) + (6)	=	
(8) Total $E(m) = s$	um of Pre-2011 E(m) + 2011 E(m)		

Calculation of Adjusted Total Jurisdictional E(m)

!		
(9)	Jurisdictional Allocation Ratio for Expense Month ES Form 3 10	==
(10)	Jurisdictional E(m) = Total E(m) x Jurisdictional Allocation Ratio [(8) x (9)]	=
(11)	Prior Period Adjustment related to Rate Base or OE (if necessary)	=
(12)	Adjusted Total Jurisdictional E(m) [(10) + (11)]	=
l		

Calculation of Group Environmental Surcharge Billing Factors

		GROUP 1 (Total Revenue)	GROUP 2 (Net Revenue)
(13)	Revenue as a Percentage of Total Revenue for Current Month ES Form 3 00	==	
(14)	Group E(m) [(12) x (13)]	=	
(15)	Adjustment for (Over)/Under-collection pursuant to Case No	MASS.	
(16)	Prior Period Adjustment related to Revenue (if necessary)	500	
(17)	Revenue Collected through Base Rates	22	
(18)	Net Group E(m) = Group E(m) less Expense Month Revenue Collected Through Base Rates $[(14) + (15) + (16) - (17)]$	=	
(19)	Group R(m) = Average Monthly Group Revenue for the 12 Months Ending with the Current Expense Month ES Form 3 00	=	
(20)	Group Environmental Surcharge Billing Factors [(18) ÷ (19)]	=	

ES FORM 2.00

KENTUCKY UTILITIES COMPANY ENVIRONMENTAL SURCHARGE REPORT

Revenue Requirements of Environmental Compliance Costs For the Expense Month of

Determination of Environmental Compliance Rate Base

Determination of Environmental Companies Rate Base		
	Pre-2011 Enviromental Compliance Plan	s 2011 Enviromental Compliance Plan
Eligible Pollution Control Plant		
Eligible Pollution CWIP Excluding AFUDC		
Subtotal		
Additions:		
Inventory - Limestone		
Less: Limestone Inventory in base rates		
Inventory - Emission Allowances per ES Form 2.31, 2.32 and 2.33		
Less: Allowance Inventory Baseline		
Net Emission Allowance Inventory		
Cash Working Capital Allowance		
Subtotal		
Deductions.		
Accumulated Depreciation on Eligible Pollution Control Plant		
Pollution Control Deferred Income Taxes	·	
Pollution Control Deferred Investment Tax Credit		
Subtotal		
Environmental Compliance Rate Base		

Determination of Pollution Control Operating Expenses

	Pre-2011	
	Environmental	2011 Environmental
	Compliance Plan	Compliance Plan
Monthly Operations & Maintenance Expense		
Monthly Depreciation & Amortization Expense		
Monthly Taxes Other Than Income Taxes		
Monthly Emission Allowance Expense from ES Form 2.31, 2.32 and 2.33		
Add KU Current Month TC2 SO ₂ Emission Allowance Expense not reflected on ES Form 2.31		
Less Monthly Emission Allowance Expense in base rates (1/12 of \$58,345.76)		
Net Recoverable Emission Allowance Expense		
Monthly Surcharge Consultant Fee		
Total Pollution Control Operations Expense		

Determination of Beneficial Reuse Operating Expenses

	Environmental
	Compliance Plan
Total Monthly Beneficial Reuse Expense	
Adjustment for Beneficial Reuse in Base Rates (from ES Form 2.61)	
Net Beneficial Reuse Operations Expense	

Proceeds From By-Product and Allowance Sales

	Total	Amount in	Net
	Proceeds	Base Rates	Proceeds
	(1)	(2)	(1) - (2)
Allowance Sales			
Scrubber By-Products Sales			
Total Proceeds from Sales			

Limestone Inventory

For the Month Ended:

	Beginning	n ,	Other	Y F. *1* 3	Ending	Reason(s) for					
	Inventory	Purchases	Adjustments	Utilized	Inventory	Adjustments					
Spare Parts											
				Limes	tone						
At Ghent:											
Tons											
Dollars											
\$/Ton											
At E.W. Brown:											
Tons											
Dollars											
\$/Ton											

Ghent Limestone Inventory in Base Rates: \$ 76,473.34

Net to be included in ECR

Plant, CWIP & Depreciation Expense

For the Month Ended:

(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
Description	Eligible Plant In Service	Eligible Accumulated Deprecention	CWIP Amount Excluding AFUDC	Eligible Net Plant In Service	Unamortized ITC as of	Deferred Tax Balance as of	Monthly Depreciation Expense	Monthly Property Tax Expense
				(2)-(3)+(4)				
2005 Plan: Project 19 - Ash Handling at Ghent 1 and Ghent Station Project 20 - ATB Expansion at E.W. Brown Station (Phase I) Project 21 - FGD's at all E.W. Brown Units and at Ghent 1, 3, and 4 Subtotal								
Less Retirements and Replacement resulting from implementation of 2005 Plan								
Net Total - 2005 Plan:		I						
2006 Plan: Project 23 - TC2 AQCS Equipment Project 24 - Sorbent Injection Project 25 - Metcury Monitors Project 27 - E.W. Brown Electrostatic Precipitators								
Subtotal Less Retirements and Replacement resulting from implementation of 2006 Plan								
Net Total - 2006 Plan:								
2009 Plan: Project 28 - Brown 3 SCR Project 29 - Brown Aux Pond (Phase II) Project 30 - Ghent CCP Storage (Landfill - Phase I) Project 31 - Trimble County Ash Treatment Basin (BAP/GSP) Project 32 - Trimble County CCP Storage (Landfill - Phase I) Project 33 - Beneficial Reuse								
Subtotal Less Retirements and Replacement resulting from implementation of 2009 Plan								
Net Total - 2009 Plan:								
2011 Plan: Project 29 - Brown Landfill (Phase I) Project 34 - E.W. Brown Station Air Compliance Project 35 - Chent Station Air Compliance								
Subtotal Less Retirements and Replacement resulting from implementation of 2011 Plan								
Net Total - 2011 Plan:								
No. Trial All Donor								
Net Total - All Plans:	<u> </u>	<u> </u>		<u> </u>		<u> </u>		

Note 1: Trimble County projects for the 2009 Plan are proportionately shared by KU at 48% and LG&E at 52%
Note 2: Project 29 as approved in the 2009 ECR Plan recovers costs associated with the Brown Aux Pond (Phase II). In the 2011 Plan, Project 29 was amended to recover costs associated with the conversion of the Brown Main Ash Pond to the Brown Landfill (Phase I)

Inventory of Emission Allowances

For the Month Ended:

Vintage Year	Nu	mber of Allowan	ces	Tota	l Dollar Value Of Vintage	Year	Comments and Explanations
	SO ₂	NOx	NOx	SO ₂	NOx	NOx	
	_	Annual	Ozone Season		Annual	Ozone Season	
Current Year							
2012							
2013							
2014							
2015							
2016							
2017							
2018							
2019			3				
2020							
2021							
2022							
2023							
2024							
2025							
2026							
2027							
2028							
2029							
2030							
2031 - 2040							

In the "Comments and Explanation" Column, describe any allowance inventory adjustment other than the assignment of allowances by EPA. Inventory adjustments include, but are not limited to, purchases, allowances acquired as part of other purchases, and the sale of allowances.

Inventory of Emission Allowances (SO2) - Current Vintage Year

For the Month Ended:

	Beginning	Allocations/	Utilized	Utilized		Ending	Allocation, Purchase, or				
	Inventory	Purchases	(Coal Fuel)	(Other Fuels)	Sold	Inventory	Sale Date & Vintage Years				
TOTAL EMISSIC	TOTAL EMISSION ALLOWANCES IN INVENTORY, ALL CLASSIFICATIONS										
Quantity											
Dollars											
\$/Allowance											
	LOWANCES FRO	M EPA: COAL FU	JEL								
Quantity											
Dollars											
ALLOCATED AL	LOWANCES FRO	M EPA: OTHER	FUELS								
Quantity											
Dollars											
ALLOWANCES I	ROM PURCHASI	ES:									
From Market:											
Quantity											
Dollars											
\$/Allowance											
From LG&E											
Quantity											
Dollars											
\$/Allowance											
						······································					

Emission Allowance Expense for Other Power Generation is excluded from expense reported on Form 2.00 for recovery through the monthly billing factor

Inventory of Emission Allowances (NOx) - Ozone Season Allowance Allocation

For the Month Ended:

	Beginning	Allocations/	Utilized	Utilized		Ending	Allocation, Purchase, or				
	Inventory	Purchases	(Coal Fuel)	(Other Fuels)	Sold	Inventory	Sale Date & Vintage Years				
TOTAL EMISSIO	TOTAL EMISSION ALLOWANCES IN INVENTORY, ALL CLASSIFICATIONS										
Quantity											
Dollars											
\$/Allowance											
ALLOCATED AL	LOWANCES FRO	OM EPA: COAL F	UEL		I	ı					
Quantity											
Dollars											
<u> </u>					<u> </u>						
ALLOCATEDAL	I OWANGE ED	Maria - Orition	ESTITUTE C								
ALLOCATED AL	LUWANCES FRU	JMI EPA: UTHEK	FUELS		T	·					
Quantity											
Dollars											
		L	<u> </u>		<u> </u>	l					
ALLOWANCES I	TROM PURCHASI	FS.									
From Market:	KOM I CKCIIAO	l .				l					
Quantity											
Dollars											
\$/Allowance											
		1									
From LG&E:											
Quantity											
Dollars											
\$/Allowance											
			<u> </u>	1	1		Lyrania di Carantina di Caranti				
<u></u>											

Emission Allowance Expense for Other Power Generation is excluded from expense reported on Form 2.00 for recovery through the monthly billing factor.

Inventory of Emission Allowances (NOx) - Annual Allowance Allocation

For the Month Ended:

	Beginning	Allocations/	Utilized	Utilized		Ending	Allocation, Purchase, or				
	Inventory	Purchases	(Coal Fuel)	(Other Fuels)	Sold	Inventory	Sale Date & Vintage Years				
TOTAL EMISSIO	FOTAL EMISSION ALLOWANCES IN INVENTORY, ALL CLASSIFICATIONS										
Quantity											
Dollars											
\$/Allowance											
ALLOCATED AL	LOWANCES FRO	OM EPA: COAL F	UEL			·					
Quantity											
Dollars											
ALLOCATED AL	LOW/ANCES EDG	M EDA. OTHED	ETIET C								
	LOWANCES FRO	JM EPA: OTHER	FUELS			1					
Quantity Dollars											
Dollars											
					L						
ALLOWANCES I	ROM PURCHASI	ES:									
From Market:		I									
Quantity											
Dollars											
\$/Allowance											
From LG&E:											
Quantity											
Dollars							·				
\$/Allowance											

Emission Allowance Expense for Other Power Generation is excluded from expense reported on Form 2.00 for recovery through the monthly billing factor.

ES FORM 2.40

KENTUCKY UTILITIES COMPANY ENVIRONMENTAL SURCHARGE REPORT

O&M Expenses and Determination of Cash Working Capital Allowance

For the Month Ended:

Environmental Compliance Plan									
O&M Expenses	Pre-2011 Plans Amount	2011 Plan Amount							
11th Previous Month									
10th Previous Month									
9th Previous Month									
8th Previous Month									
7th Previous Month									
6th Previous Month									
5th Previous Month									
4th Previous Month									
3rd Previous Month									
2nd Previous Month									
Previous Month									
Current Month									
Total 12 Month O&M									

Determination of Working Capital Allowance							
12 Months O&M Expenses							
One Eighth (1/8) of 12 Month O&M Expenses	1/8	1/8					
Pollution Control Cash Working Capital Allowance							

Pollution Control - Operations & Maintenance Expenses

For the Month Ended:

	E. W.					
O&M Expense Account	Brown	Ghent	Green River	Тутопе	Trimble County	Total
2005 Plan		1				
502056 - ECR Scrubber Operations						
512055 - ECR Scrubber Maintenance						
Total 2005 Plan O&M Expenses		<u> </u>				
2006 Plan						
506159 - ECR Sorbent Injection Operation						
506152 - ECR Sorbent Reactant - Reagent Only						
512152 - ECR Sorbent Injection Maintenance						
506150 - ECR Mercury Monitors Operation			ļ			
512153 - ECR Mercury Monitors Maintenance						
506154 - ECR NOx Operation — Consumables						
506155 - ECR NOx Operation Labor and Other	f					
512151 - ECR NOx Maintenance						
502056 - ECR Scrubber Operations						
512055 - ECR Scrubber Maintenance						
506051 - ECR Precipitator Operation						
506151 - ECR Activated Carbon	r					
512051 - ECR Precipitator Maintenance						
Total 2006 Plan O&M Expenses						
2009 Plan						
506154 - ECR NOx Operation Consumables		_				
506155 - ECR NOx Operation Labor and Other						
512151 - ECR NOx Maintenance						
502012 - ECR Landfill Operations						ļ
512105 - ECR Landfill Maintenance						
Adjustment for CCP Disposal in Base Rates (ES Form 2.51)						
Total 2009 Plan O&M Expenses						
2011 Plan						
506159 - ECR Sorbent Injection Operation	I	· [· · · · · · · · · · · · · · · · · ·				
506159 - ECR Sorbent Reactant - Reagent Only						
512152 - ECR Sorbent Injection Maintenance						
506156 - ECR Baghouse Operations		 				
512156 - ECR Baghouse Maintenance		-				
506151 - ECR Activated Carbon						
Total 2011 Plan O&M Expenses						
Tom 2011 I fair Octat Expenses		<u> </u>				
Current Month O&M Expense for All Plans	TTTTTTTTTTTTTTTTTTTTTTTTTTTTTTTTTTTTTT	1	1		1	T
Current Product Control Page 101 111 1 11113	L		1 1			1

Note 1: Trimble County projects for the 2009 Plan are proportionately shared by KU at 48% and LG&E at 52%.

ES FORM 2.51

KENTUCKY UTILITIES COMPANY ENVIRONMENTAL SURCHARGE REPORT

CCP Disposal Facilities Expenses
For the Month Ended:

On-Site CCP Disposal O&M Expense	Ghent	Trimble County
Existing CCP Disposal Facilities (Pre 2009 Plan Project)		
(1) 12 Months Ending with Expense Month		
(2) Monthly Amount [(1) / 12]		
2009 Plan Project		
(3) Monthly Expense		
Total Generating Station		
(4) Monthly Expense [(2) + (3)]		
Base Rates		
(5) Annual Expense Amount (12 Mo Ending with Last Test Year)		
(6) Monthly Expense Amount [(5) / 12]		
(7) Total Generating Station Less Base Rates [(4) - (6)]		
(8) Less 2009 Plan Project [(7) - (3)]		
If Line (8) Greater than Zero, No Adjustment		
If Line (8) Less than Zero, Adjustment for Base Rates		
Adjustment for Base Rate Amount (to ES Form 2.50)		

Note 1: Trimble County projects for the 2009 Plan are proportionately shared by KU at 48% and LG&E at 52%.

Note 2: ES Form 2.51 will not be utilized until O&M costs associated with the 2009 Plan are incurred.

Beneficial Reuse - Operations & Maintenance Expenses For the Month Ended:

Third Party	O&M Expense Account	Plant	Total O&M					
Total Monthly Be	Total Monthly Beneficial Reuse Expense							
A 1': -4 4 C D								
	Adjustment for Beneficial Reuse in Base Rates (from ES Form 2.61) Net Beneficial Reuse O&M Expense							

Beneficial Reuse Opportunities
For the Month Ended:

On-Site CCP Disposal O&M Expense	E. W. Brown	Ghent	Green River	Tyrone	Trimble County	Total
Existing Beneficial Reuse Opportunities (Pre 2009 Plan Project)						
(1) 12 Months Ending with Expense Month						
(2) Monthly Amount [(1) / 12]						
2009 Plan Project 33						
(3) Monthly Amount (Expense/Revenue)						
Total Beneficial Reuse - Generating Station						
(4) Monthly Expense [(2) + (3)]						
Beneficial Reuse in Base Rates						
(5) Annual Expense Amount (12 Mo Ending with Last Test Year)						
(6) Monthly Expense Amount [(5) / 12]						
(7) Total Generating Station Less Base Rates [(4) - (6)]						
(8) Less 2009 Plan Project 33 [(7) - (3)]						
If Line (8) Greater than Zero, No Adjustment						
If Line (8) Less than Zero, Adjustment for Base Rates						
A C B B A A A A FOR OVA						
Adjustment for Base Rate Amount (to ES Form 2.60)						

Note 1: Trimble County projects for the 2009 Plan are proportionately shared by KU at 48% and LG&E at 52%.

Monthly Average Revenue Computation of R (m) for GROUP 1 AND GROUP 2

For the Month Ended:

	GROUP 1 (Total Revenues) - Kentucky Jurisdictional Revenues							
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	
Month	Non-fuel Base Rate Revenues	Base Rate Fuel Component	Fuel Clause Revenues	DSM Revenues	Environmental Surcharge Revenues	Total	Total Excluding Environmental Surcharge	
	<u> </u>					(2)+(3)+(4)+(5)+(6)	(7)-(6)	
					-			
						 		
		<u> </u>						
Average Monthly Jurisdictional Revenues, Excluding Environmental Surcharge, for 12 Months Ending Current Expense Month.							s -	
Total Kentucky Jurisdictional Revenues for Environmental Surcharge Purposes from ES Form 3.10 =						S -		
GROUP 1 Revenues as a Percentage of Total Revenues for Current Month							%	

	GROUP 2 (Net Revenues) - Kentucky Jurisdictional Revenues							
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
Month	Non-fuel Base Rate Revenues	Base Rate Fuel Component	Fuel Clause Revenues	DSM Revenues	Environmental Surcharge Revenues	Totai	Total Excluding Environmental Surcharge	Total Non-Fuel Revenues plus DSM
						(2)+(3)+(4)+(5)+(6)	(7)-(6)	(2)+(5)
						ļ		
					 			
	Average Monthly Junsdictional Revenues, Excluding Environmental Surcharge and Fuel, for 12 Months Ending Current Expense Month.							s -
	Total Kentucky Jurisdictional Revenues for Environmental Surcharge Purposes from ES Form 3.10 =						*	
GROUP 2 Revenue	GROUP 2 Revenues as a Percentage of Total Revenues for Current Month						°/o	

Reconciliation of Reported Revenues and Calculation of Jurisdictional Allocation Percentage for Current Month

For the Month Ended:

	Revenues	per	Revenues per	
	Form 3.00		Income Statement	
Kentucky Retail Revenues				
(1) Base Rates (Customer Charge, Energy Charge, Demand Charge)	\$	_	\$	
(2) Fuel Adjustment Clause	\$		\$	-
(3) DSM	\$		\$	-
(4) Environmental Surcharge			\$	
(5) CSR Credits			\$	-
(6) Total Kentucky Jurisdictional Revenues for Environmental Surcharge Purposes =	\$			
Non -Jurisdictional Revenues				
(7) Tennessee Retail	\$		\$	
(8) Virginia Retail	\$		\$	
(9) Wholesale	\$		\$	
(10) InterSystem (Total Less Transmission Portion Booked in Account 447)	\$	-	\$	
(11) Total Non-Jurisdictional Revenues for Environmental Surcharge Purposes =	\$			
(12) Total Company Revenues for Environmental Surcharge Purposes =	\$	_		
Jurisdictional Allocation Ratio for Current Month [(6) / (12)] =	%			
Reconciling Revenues				
(13) Brokered	\$	-	\$	-
(14) InterSystem (Transmission Portion Booked in Account 447)			\$	-
(15) Unbilled			\$	-
(16) Provision for Refund			\$	-
(17) Miscellaneous			\$	-
(18) Total Company Revenues per Income Statement =			\$	-