



a PPL company

Jeff DeRouen, Executive Director
Public Service Commission of Kentucky
211 Sower Boulevard
P. O. Box 615
Frankfort, Kentucky 40602

July 25, 2011

RE: *In the Matter of: The 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*

Dear Mr. DeRouen:

Enclosed please find an original and fifteen (15) copies of Louisville Gas and Electric Company's (LG&E) response to the Commission Staff's First Information Request dated July 12, 2011, in the above-referenced matter.

Also enclosed are an original and fifteen (15) copies of a Petition for Confidential Protection regarding certain information contained in response to Question Nos. 9, 22(c), 32(f), 37, 45, and 46(b).

The verification page for Gary H. Revlett is being filed under a separate cover letter.

Should you have any questions regarding the enclosed, please contact me at your convenience.

Sincerely,

Robert M. Conroy

cc: Parties of Record

RECEIVED
JUL 25 2011
PUBLIC SERVICE
COMMISSION

**Louisville Gas and
Electric Company**
State Regulation and Rates
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P.O. Box 32010
Louisville, Kentucky 40232
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COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

THE APPLICATION OF LOUISVILLE GAS AND)
ELECTRIC COMPANY FOR CERTIFICATES)
OF PUBLIC CONVENIENCE AND NECESSITY)
AND APPROVAL OF ITS 2011 COMPLIANCE) **CASE NO. 2011-00162**
PLAN FOR RECOVERY BY ENVIRONMENTAL)
SURCHARGE)

LOUISVILLE GAS AND ELECTRIC COMPANY
RESPONSE TO THE COMMISSION STAFF'S
FIRST INFORMATION REQUEST

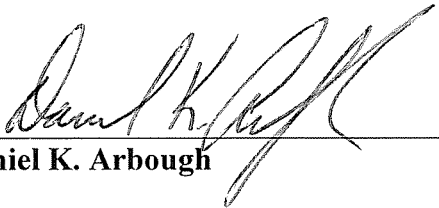
DATED JULY 12, 2011

FILED: JULY 25, 2011

VERIFICATION

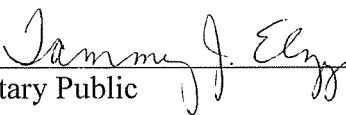
COMMONWEALTH OF KENTUCKY)
) SS:
COUNTY OF JEFFERSON)

The undersigned, **Daniel K. Arbough**, being duly sworn, deposes and says that he is Treasurer for Louisville Gas and Electric Company and an employee of LG&E and KU Services Company, and that he has personal knowledge of the matters set forth in the responses for which he is identified as the witness, and the answers contained therein are true and correct to the best of his information, knowledge and belief.



Daniel K. Arbough

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 22nd day of July 2011.

 (SEAL)

Notary Public

My Commission Expires:

November 9, 2014

VERIFICATION

COMMONWEALTH OF KENTUCKY)
) SS:
COUNTY OF JEFFERSON)

The undersigned, **Lonnie E. Bellar**, being duly sworn, deposes and says that he is Vice President, State Regulation and Rates for Louisville Gas and Electric Company and an employee of LG&E and KU Services Company, and that he has personal knowledge of the matters set forth in the responses for which he is identified as the witness, and the answers contained therein are true and correct to the best of his information, knowledge and belief.



Lonnie E. Bellar

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 22nd day of July 2011.

 (SEAL)

Notary Public

My Commission Expires:

November 9, 2014

VERIFICATION

COMMONWEALTH OF KENTUCKY)
) SS:
COUNTY OF JEFFERSON)

The undersigned, **Shannon L. Charnas**, being duly sworn, deposes and says that she is Director – Accounting and Regulatory Reporting for LG&E and KU Services Company, and that she has personal knowledge of the matters set forth in the responses for which she is identified as the witness, and the answers contained therein are true and correct to the best of her information, knowledge and belief.

Shannon L. Charnas

Shannon L. Charnas

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 22nd day of July 2011.

Sammy J. Ely (SEAL)

Notary Public

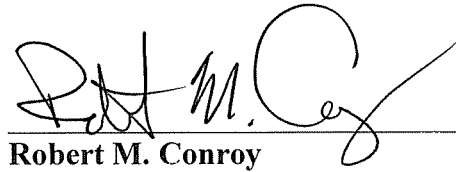
My Commission Expires:

November 9, 2014

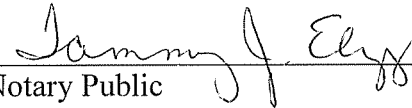
VERIFICATION

COMMONWEALTH OF KENTUCKY)
) SS:
COUNTY OF JEFFERSON)

The undersigned, **Robert M. Conroy**, being duly sworn, deposes and says that he is Director - Rates for LG&E and KU Services Company, and that he has personal knowledge of the matters set forth in the responses for which he is identified as the witness, and the answers contained therein are true and correct to the best of his information, knowledge and belief.


Robert M. Conroy

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 22nd day of July 2011.

 (SEAL)
Notary Public

My Commission Expires:

November 9, 2014

VERIFICATION

COMMONWEALTH OF KENTUCKY)
) SS:
COUNTY OF JEFFERSON)

The undersigned, **Charles R. Schram**, being duly sworn, deposes and says that he is Director – Energy Planning, Analysis and Forecasting for LG&E and KU Services Company, and that he has personal knowledge of the matters set forth in the responses for which he is identified as the witness, and the answers contained therein are true and correct to the best of his information, knowledge and belief.

Charles R. Schram
Charles R. Schram

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 22nd day of July 2011.

Jammy J. Elzy (SEAL)
Notary Public

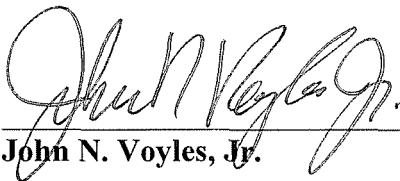
My Commission Expires:

November 9, 2014

VERIFICATION

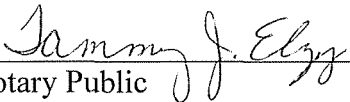
COMMONWEALTH OF KENTUCKY)
) SS:
COUNTY OF JEFFERSON)

The undersigned, **John N. Voyles, Jr.**, being duly sworn, deposes and says that he is Vice President, Transmission and Generation Services for Louisville Gas and Electric Company and an employee of LG&E and KU Services Company, and that he has personal knowledge of the matters set forth in the responses for which he is identified as the witness, and the answers contained therein are true and correct to the best of his information, knowledge and belief.



John N. Voyles, Jr.

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 22nd day of July 2011.

 (SEAL)

Notary Public

My Commission Expires:

November 9, 2014

LOUISVILLE GAS AND ELECTRIC COMPANY

Response to Commission Staff's First Information Request Dated July 12, 2011

Case No. 2011-00162

Question No. 1

Witness: Robert M. Conroy

- Q-1. Refer to Appendix A of the Application at page 1. The bill impact upon an average residential customer is based on average usage of 1,000 kWh per month.
- a. Provide the most recent actual average usage for a residential customer and using the actual average usage, provide the monthly increase on both a dollar and a percentage basis in 2012 and 2016.
 - b. Provide the information requested in item 1.a for an electric space-heating customer.
 - c. Provide the information requested in item 1.a for an electric customer served under rate schedule GS.
- A-1. a. The bill impact provided the Application and in testimony was based on a residential customer using 1,000 kWh per month and was not meant to be representative of the actual average residential usage. Actual average usage for residential customers will vary from month to month. Therefore LG&E used 1,000 kWh per month as a general representation to reflect the impact on a residential customer's bill. The actual average usage for a residential customer for the 12-months ending May 31, 2011 is 1,068 kWh. The monthly bill impact on LG&E's average residential customer is as follows:

2012	2013	2014	2015	2016
\$2.08	\$5.96	\$9.63	\$15.95	\$17.33

- The impact to LG&E customers shown as a percentage is based on the jurisdictional revenue requirement and the forecasted 12-month retail revenues. To calculate the residential customer bill impact, the resulting percentage, or billing factor, is then applied to the total of the basic service charge, energy charge, FAC billings and DSM billings. Therefore, a change in the residential usage assumption will impact the increase in dollars but does not change the billing factor.
- b. The requested information is not available. LG&E does not separately track electric space-heating customers.

- c. For the 12-months ending May 31, 2011, the actual average usage for a GS customer taking single-phase service is 1,430 kWh and three-phase service is 5,667 kWh. The monthly bill impact is as follows:

	2012	2013	2014	2015	2016
GS Single-Phase	\$3.51	\$10.04	\$16.24	\$26.90	\$29.22
GS Three-Phase	\$11.71	\$33.53	\$54.23	\$89.82	\$97.59

LOUISVILLE GAS AND ELECTRIC COMPANY

Response to Commission Staff's First Information Request Dated July 12, 2011

Case No. 2011-00162

Question No. 2

Witness: Charles R. Schram

- Q-2. Refer to the Direct Testimony of Charles R. Schram ("Schram Testimony") and Exhibit CRS-1. Mr. Schram explains the methodology used to analyze the projects included in LG&E's 2011 Environmental Compliance Plan, presents the evidence of the analysis, and makes the final recommendations related to the most cost effective method of complying with appropriate environmental laws and regulations.
- a. Was the effect of potential regulations concerning carbon mitigation considered in any of the analysis? Explain.
 - b. If the answer to a. above is no, would the consideration of carbon mitigation change the proposed 2011 Compliance Plan? Explain. Include in the explanation whether additional unit retirements could result.
- A-2.
- a. Yes, however it is not possible at this time to estimate the scope or costs of potential carbon mitigation regulations and the potential impact on coal and gas fired generating units. There remains considerable uncertainty associated with any future potential carbon mitigation legislation, but the regulations which resulted in the 2011 Compliance Plan are known and imminent. These regulations take effect as early as 2012 and the Company is obligated to comply with the regulations while providing reliable electricity in a least-cost manner.
 - b. While it is possible that consideration of carbon mitigation could change the proposed 2011 Compliance Plan, it is not possible at this time to estimate the scope or costs of potential carbon mitigation regulations and the potential impact on coal and gas fired generating units. Under its "Tailoring Rule", the EPA will regulate CO₂ emissions on a Best Available Control Technology ("BACT") basis, but current BACT solutions for fossil fueled generation, if triggered by permit actions, would not change the 2011 Compliance Plan. Carbon capture and sequestration technologies are not commercially viable on a large scale basis.

LOUISVILLE GAS AND ELECTRIC COMPANY

Response to Commission Staff's First Information Request Dated July 12, 2011

Case No. 2011-00162

Question No. 3

Witness: John N. Voyles, Jr.

- Q-3. Explain the availability of contractors for the emission control systems for which construction is proposed. Include whether contractors for the work are specifically dedicated to environmental compliance work and if so, whether there is concern as to the availability of the contractors to meet EPA deadlines.
- A-3. At this time, the companies that perform these types of large emission control construction projects are available. We believe our plan positions us well to secure contractors from the engineering, procurement & construction (EPC) market and secure adequate resources to perform the work. However, we believe a significant risk exists regarding the availability of experienced contractors to perform the work for the installation of air quality control systems if we do not proceed with securing the contracts as planned. As other utilities enter the market place and compete for resources, we may experience difficulties hiring the best contractors which may ultimately delay the project, increase the cost, or affect quality and safety of the projects.

LOUISVILLE GAS AND ELECTRIC COMPANY

Response to Commission Staff's First Information Request Dated July 12, 2011

Case No. 2011-00162

Question No. 4

Witness: John N. Voyles, Jr.

Q-4. Provide the age and estimated remaining life of each of LG&E's coal-fired generation units.

A-4. The current age of each of LG&E's coal-fired units is shown in the table below.

Plant Name	Age (years)
Cane Run 4	49
Cane Run 5	45
Cane Run 6	42
Mill Creek 1	39
Mill Creek 2	37
Mill Creek 3	33
Mill Creek 4	29
Trimble County 1	21
Trimble County 2	0.5

LG&E believes that continuing a prudent level of ongoing maintenance and investment at its remaining generating units will ensure the ongoing reliable operation of the units and minimize the potential for a significant mechanical failure. Consistent with information provided to the Commission in previous IRP and other proceedings, LG&E has informally grouped units into categories for guiding investment decisions that ensure the remaining useful life is maintained. The expected remaining useful life of each coal unit is discussed below.

With respect to the Trimble County 1 and Mill Creek 3-4 Units, LG&E will maintain these units in such a way as to ensure that, year over year, a minimum 30-year remaining useful life is expected. In other words, for each year LG&E operates and maintains these units, LG&E expects to have at least a 30-year remaining useful life commencing in that year. LG&E has made significant investments in environmental controls on these units.

With respect to Trimble County 2, the new unit is expected to have a life expectancy of at least 60 years.

With respect to the Mill Creek 1-2 Units, LG&E will maintain these units in such a way as to ensure that, year over year, a minimum 20-year remaining useful life is expected. In other words, for each year LG&E operates and maintains these units, LG&E expects to have at least a 20-year remaining useful life commencing in that year.

Although Cane Run 4 is now planned to be retired in 2016, LG&E has maintained the unit with the expectation for the unit to have, year over year, a minimum 10-years of remaining useful life. Although Cane Run 5-6 are now planned to be retired in 2016, LG&E has maintained the units with the expectation for the units to have, year over year, a minimum 15-years of remaining useful life.

LOUISVILLE GAS AND ELECTRIC COMPANY

Response to Commission Staff's First Information Request Dated July 12, 2011

Case No. 2011-00162

Question No. 5

Witness: John N. Voyles, Jr. / Charles R. Schram

- Q-5. Refer to Schram Testimony at page 4. Beginning at line 7, Mr. Schram states, "we assumed that the proposed suite of environmental facilities for each unit was the most cost-effective suite of facilities for the unit; in other words, an analysis of numerous combinations of possible environmental controls for each unit was not necessary." Explain fully the reason(s) for this assumption.
- A-5. The Companies did not base the economic analysis on assumptions for least cost facilities. The Companies clarify that the term "assumed", as used in the Schram testimony on page 4, lines 7-10, refers to the process of using the recommended suite of facilities from the Companies' work with Black and Veatch as inputs to the economic analysis. The Black and Veatch (B&V) study developed the least cost controls to meet emissions limits. The economic analysis then compared building those controls to retiring the unit(s) to determine the least cost compliance plan.

As described more fully in Exhibits JNV-2 and CRS-1, the Companies examined the emissions profile required by the regulations and identified the least-cost technologies to achieve the required emissions reductions. The Companies worked in concert with B&V on assessing potential technologies for each pollutant, the potential layouts of each technology, as well as a review of all B&V submitted draft reports.

Ultimately, the needs analysis identified that reductions in SO₂, Mercury, Particulate Matter and Sulfuric Acid Mists were required. Proven technology alternatives for reducing these emissions are limited. The least costly controls for meeting emissions limits were provided in the Black and Veatch study and used as inputs to the economic analysis.

LOUISVILLE GAS AND ELECTRIC COMPANY

Response to Commission Staff's First Information Request Dated July 12, 2011

Case No. 2011-00162

Question No. 6

Witness: Charles R. Schram

- Q-6. Refer to Exhibit CRS-1 of the Application, at page 4.
- a. The fourth column in Table 2 is labeled "Difference (A)-(B)". Should the column heading read "Difference (B)-(A)"?
 - b. It is stated that installation of additional environmental controls on the Cane Run units 4-6 is not cost effective and the units will be retired pursuant to the 2011 Compliance Plan.
 - (1) Provide the projected dates by which each unit is to be retired.
 - (2) Provide the generating capacity to be lost upon retirement of the units and the LG&E's plan to replace the power.
- A-6.
- a. Yes, the heading should read "Difference (B)-(A)" to most accurately describe the arithmetic subtraction calculation to support the convention that a result greater than zero represents lower net present value of revenue requirements for building controls versus unit retirement.
 - b. (1) Cane Run Units 4-6 are assumed to be retired by December 31, 2015.
 - (2) The retirement of the Cane Run Units results in a reduction of 563 MW of net summer capacity. LG&E is currently evaluating options for replacement capacity. This evaluation includes the responses to a Request for Proposal (RFP) for capacity and energy. LG&E anticipates that any necessary regulatory filings will take place in the fall of 2011.

LOUISVILLE GAS AND ELECTRIC COMPANY

Response to Commission Staff's First Information Request Dated July 12, 2011

Case No. 2011-00162

Question No. 7

Witness: John N. Voyles, Jr.

- Q-7. Refer to the Direct Testimony of Shannon L. Charnas ("Charnas Testimony") at page 3. LG&E proposes to make modifications to Mill Creek Units 3 and 4 to expand the operating range of the units at which their Selective Catalytic Reduction equipment can function to reduce nitrogen oxide emissions, but it does not propose to recover operation and maintenance ("O&M") expenses associated with these modifications.
- a. Explain the nature of these modifications and the resultant O&M expenses.
 - b. Will the labor portion of the O&M expenses, if any, be performed by existing LG&E employees? Explain.
 - c. Explain the decision to not request recovery of the O&M expenses associated with these modifications.
- A-7.
- a. The engineering to determine the specific modifications to the boiler circuit to allow for increased utilization of the SCR has not been finalized, but is scheduled to be completed in early 2012. However, one option being explored and which is reflected in the costs submitted with this ECR filing is to modify the economizers (the last boiler circuit) by changing the surface area which will allow the generating unit to keep the flue gas temperatures higher when operating at lower loads and possibly cooler at higher loads. The higher temperatures at lower loads will allow the SCR to remain in operation at lower loads.
 - b. Operations and Maintenance activities are typically performed by LG&E employees but contracted labor is used to supplement the workforce if necessary.
 - c. As discussed in the testimony of Mr. Voyles, there is no additional O&M cost associated with this project.

Since the capital cost and O&M expense associated with the SCR were included in base rates in conjunction with Plan elimination from the ECR as of the Commission's Order in Case No. 2009-00549, LG&E believes that for simplicity it was not necessary to include the O&M in the ECR for this project.

LOUISVILLE GAS AND ELECTRIC COMPANY

Response to Commission Staff's First Information Request Dated July 12, 2011

Case No. 2011-00162

Question No. 8

Witness: Charles R. Schram

- Q-8. Explain whether the 2011 Compliance Plan will result in de-rating any of the affected units. If so, identify the unit, current rating, and projected rating by unit.
- A-8. The tables in the subsections of Section 4.2 of Exhibit CRS-1 identify the unit-specific auxiliary power requirements for the controls contained in the 2011 Compliance Plan. These de-rates were used in the economic analysis.

LOUISVILLE GAS AND ELECTRIC COMPANY

Response to Commission Staff's First Information Request Dated July 12, 2011

Case No. 2011-00162

Question No. 9

Witness: Charles R. Schram

- Q-9. Explain whether the 2011 Compliance Plan will result in any of LG&E's units being taken offline? If yes, provide which units will be taken out of service and the specific period of time the units will be out of service.
- A-9. Please see the attached. The timing of the addition of new environmental controls will coincide with the Companies' planned outage schedule that may change from time to time. For most units, the addition of controls extends the planned outage by one to two weeks. The attached summary of the outages that include the addition of environmental controls as well as the number of additional outage weeks, if any, that can be attributed specifically to the environmental controls. Certain redacted information is being filed with the Commission under seal pursuant to a Petition for Confidential Protection.

CONFIDENTIAL INFORMATION REDACTED

Summary of Outages that Include the Addition of Environmental Controls

Unit	Start Date	End Date	Equipment	# Weeks Attributed to ECR Equipment
Brown 1			Baghouse, SAM Mitigation	0
Brown 2			Baghouse, SAM Mitigation	1
Brown 3			Baghouse	1
Ghent 1			Baghouse, SAM Mitigation/SCR Turn-Down	1
Ghent 2			SAM Mitigation	0
Ghent 3			Baghouse ¹	1
Ghent 4			SAM Mitigation/SCR Turn-Down	3
			Baghouse	0
			SAM Mitigation/SCR Turn-Down ²	1
			Baghouse ²	0
Mill Creek 1			FGD, Baghouse, SAM Mitigation	5
Mill Creek 2			FGD, Baghouse, SAM Mitigation	2
Mill Creek 3			SAM Mitigation/SCR Turn-Down	2
			FGD	0
			Baghouse	2
Mill Creek 4			SCR Upgrade	0
			FGD, Baghouse, SAM Mitigation/SCR Turn-Down	0
Trimble 1			Baghouse	0

¹GH2 outage for baghouse has since been moved to [REDACTED]

²Ghent 4 outages for SAM mitigation/SCR turn-down and baghouse have since been combined and moved to [REDACTED]

LOUISVILLE GAS AND ELECTRIC COMPANY

Response to Commission Staff's First Information Request Dated July 12, 2011

Case No. 2011-00162

Question No. 10

Witness: John N. Voyles / Robert M. Conroy

- Q-10. Refer to Exhibit 1, 2011 Environmental Compliance Plan, page 2 of 2.
- a. For each project listed, provide a breakdown of the estimated operations and maintenance expenses and explain how they were calculated.
 - b. Mill Creek Unit 3 O&M expense increased from \$4,857,328 in 2015 to \$13,019,344 in 2016. Fully explain the reasons for an increase of this magnitude.
 - c. Mill Creek Unit 4 O&M expense increased from \$3,631,737 in 2014 to \$15,519,305 in 2015. Fully explain the reasons for an increase of this magnitude.
 - d. Explain why there are not any O&M expenses indicated for 2012 through 2014 for Project 27 if it is scheduled to be completed in 2012 as indicated on page 1 of 2.
- A-10.
- a. See attached. The O&M expenses were based on estimates provided in the Black and Veatch studies as contained in Appendices to Exhibit JNV-2.
 - b. The increase in magnitude from one year to the next is based on the in-service month of the facilities being installed. For Mill Creek 3, 2016 represents a full year of O&M expense. Please see the details contained in the attachment to the response for part a.
 - c. The increase in magnitude from one year to the next is based on the in-service month of the facilities being installed. For Mill Creek 4, 2015 represents a full year of O&M expense. Please see the details contained in the attachment to the response for part a.
 - d. Project 27 is scheduled to be completed in 2015. The reference to 2012 is an error.

Incremental O&M Estimates for Projects in the 2011 ECR Plan

Louisville Gas and Electric Company

FERC Account	Scheduled In-Service	2012	2013	2014	2015	2016	2017	2018	2019	2020
Project 26 - MC Air Compliance - FGDs & Baghouses										
		\$ -	\$ 1,693,407	\$ 7,079,485	\$ 31,875,906	\$ 47,403,071	\$ 48,528,230	\$ 49,675,892	\$ 50,846,507	\$ 52,040,535
502006 / 512005	Scrubber Operations & Maintenance less: Baseline in Base Rates	\$0	\$0	\$0	\$1,067,233 (\$1,321,289)	\$1,632,866 (\$1,981,934)	\$1,665,523 (\$1,981,934)	\$1,698,834 (\$1,981,934)	\$1,732,811 (\$1,981,934)	\$1,767,467 (\$1,981,934)
	Mill Creek 1 - Combined 1 & 2 FGD	\$0	\$0	\$0	(\$254,057)	(\$349,068)	(\$316,411)	(\$283,100)	(\$249,123)	(\$214,467)
506156 / 512156	Baghouse Operations & Maintenance Activated Carbon	\$0	\$0	\$0	\$964,148 \$3,375,151	\$1,475,147 \$5,163,981	\$1,504,650 \$5,267,261	\$1,534,743 \$5,372,606	\$1,565,438 \$5,480,058	\$1,596,746 \$5,589,659
	Mill Creek 1 - Baghouse	\$0	\$0	\$0	\$4,339,300	\$6,639,128	\$6,771,911	\$6,907,349	\$7,045,496	\$7,186,406
506159 / 512152	Sorbent Injection Operations & Maintenance	\$0	\$0	\$0	\$14,733	\$38,643	\$39,416	\$40,204	\$41,008	\$41,828
506152	Sorbent Reactant - Reagent Only	\$0	\$0	\$0	\$944,869	\$2,478,257	\$2,527,822	\$2,578,379	\$2,629,946	\$2,682,545
	Mill Creek 1 - SAM Mitigation	\$0	\$0	\$0	\$959,602	\$2,516,900	\$2,567,238	\$2,618,583	\$2,670,955	\$2,724,374
	Total Mill Creek 1	\$0	\$0	\$0	\$ 5,044,845	\$ 8,806,961	\$ 9,022,738	\$ 9,242,832	\$ 9,467,327	\$ 9,696,312
502056 / 512055	Scrubber Operations & Maintenance less: Baseline in Base Rates	\$0	\$0	\$0	\$1,200,637 (\$1,183,404)	\$1,632,866 (\$1,577,872)	\$1,665,523 (\$1,577,872)	\$1,698,834 (\$1,577,872)	\$1,732,811 (\$1,577,872)	\$1,767,467 (\$1,577,872)
	Mill Creek 2 - Combined 1 & 2 FGD	\$0	\$0	\$0	\$17,233	\$54,994	\$87,651	\$120,962	\$154,939	\$189,595
506156 / 512156	Baghouse Operations & Maintenance Activated Carbon	\$0	\$0	\$0	\$1,064,150 \$4,070,388	\$1,447,245 \$5,535,728	\$1,476,189 \$5,646,442	\$1,505,713 \$5,759,371	\$1,535,828 \$5,874,558	\$1,566,544 \$5,992,050
	Mill Creek 2 - Baghouse	\$0	\$0	\$0	\$5,134,538	\$6,982,972	\$7,122,632	\$7,265,084	\$7,410,386	\$7,558,594
506159 / 512152	Sorbent Injection Operations & Maintenance	\$0	\$0	\$0	\$18,943	\$38,643	\$39,416	\$40,204	\$41,008	\$41,828
506152	Sorbent Reactant - Reagent Only	\$0	\$0	\$0	\$1,283,714	\$2,618,776	\$2,671,151	\$2,724,574	\$2,779,066	\$2,834,647
	Mill Creek 2 - SAM Mitigation	\$0	\$0	\$0	\$1,302,656	\$2,657,419	\$2,710,567	\$2,764,778	\$2,820,074	\$2,876,475
	Total Mill Creek 2	\$0	\$0	\$0	\$ 6,454,427	\$ 9,695,385	\$ 9,920,850	\$ 10,150,825	\$ 10,385,398	\$ 10,624,664

Incremental O&M Estimates for Projects in the 2011 ECR Plan

Louisville Gas and Electric Company

FERC Account	Scheduled In-Service	2012	2013	2014	2015	2016	2017	2018	2019	2020
502056 / 512055	Scrubber Operations & Maintenance less: Baseline in Base Rates Mill Creek 3 - FGD (U4 update and tie in)	\$0	\$0	\$444,961 (\$451,764) (\$6,803)	\$2,922,329 (\$2,710,584) \$211,745	\$2,980,776 (\$2,710,584) \$270,192	\$3,040,392 (\$2,710,584) \$329,808	\$3,101,199 (\$2,710,584) \$390,615	\$3,163,223 (\$2,710,584) \$452,639	\$3,226,488 (\$2,710,584) \$515,904
506156 / 512156 506151	Baghouse Operations & Maintenance Activated Carbon Mill Creek 3 - Baghouse	\$0	\$0	\$0	\$161,688	\$1,319,377	\$1,345,764	\$1,372,679	\$1,400,133	\$1,428,136
506159 / 512152 506152	Sorbent Injection Operations & Maintenance Sorbent Reactant - Reagent Only Mill Creek 3 - SAM Mitigation	\$0	\$18,363 \$1,675,044	\$37,461 \$3,417,090	\$38,210 \$3,485,432	\$38,974 \$3,555,140	\$39,754 \$3,626,243	\$40,549 \$3,698,768	\$41,360 \$3,772,743	\$42,187 \$3,848,198
	Mill Creek 3 - SCR Turn-Down	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
	Total Mill Creek 3	\$0	\$1,693,407	\$3,447,748	\$4,857,328	\$13,019,344	\$13,333,943	\$13,654,833	\$13,982,142	\$14,315,996
502056 / 512055	Scrubber Operations & Maintenance less: Baseline in Base Rates Mill Creek 4 - FGD	\$0	\$0	\$451,169 (\$430,748) \$20,421	\$2,943,541 (\$2,584,486) \$359,055	\$3,002,412 (\$2,584,486) \$417,926	\$3,062,460 (\$2,584,486) \$477,974	\$3,123,709 (\$2,584,486) \$539,223	\$3,186,184 (\$2,584,486) \$601,697	\$3,249,907 (\$2,584,486) \$665,421
506156 / 512156 506151	Baghouse Operations & Maintenance Activated Carbon Mill Creek 4 - Baghouse	\$0	\$0	\$495,584 \$3,057,340	\$1,516,487 \$9,355,461	\$1,546,817 \$9,542,570	\$1,577,754 \$9,733,422	\$1,609,309 \$9,928,090	\$1,641,495 \$10,126,652	\$1,674,325 \$10,329,185
506159 / 512152 506152	Sorbent Injection Operations & Maintenance Sorbent Reactant - Reagent Only Mill Creek 4 - SAM Mitigation	\$0	\$0	\$516 \$57,876	\$37,885 \$4,250,417	\$38,643 \$4,335,425	\$39,416 \$4,422,134	\$40,204 \$4,510,576	\$41,008 \$4,600,788	\$41,828 \$4,692,803
	Mill Creek 4 - SCR Turn-Down	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
	Total Mill Creek 4	\$0	\$0	\$3,631,737	\$15,519,305	\$15,881,381	\$16,250,699	\$16,627,402	\$17,011,640	\$17,403,563
	Project 27 - TC1 Air Compliance - Baghouse	\$0	\$0	\$0	\$3,732,365	\$7,614,024	\$7,766,305	\$7,921,631	\$8,080,064	\$8,241,665
506156 / 512156 506151	Baghouse Operations & Maintenance Activated Carbon Trimble County 1 - Baghouse	\$0	\$0	\$0	\$493,761 \$3,238,604	\$1,007,273 \$6,606,752	\$1,027,418 \$6,873,664	\$1,047,966 \$7,011,138	\$1,068,926 \$7,151,361	\$1,090,304 \$7,241,665

LOUISVILLE GAS AND ELECTRIC COMPANY

Response to Commission Staff's First Information Request Dated July 12, 2011

Case No. 2011-00162

Question No. 11

Witness: Robert M. Conroy

- Q-11. Refer to Exhibit 3, Tariff. LG&E is proposing text changes in the "Availability of Service" section. Instead of listing the individual rate schedules to which the environmental cost recovery ("ECR") surcharge would apply, the proposed text lists the tariff sections to which ECR surcharge would apply. As a result of this proposed change, would the ECR surcharge apply to Rate Schedule RTP, Real-Time Pricing, when it does not apply to that schedule currently?
- A-11. The objective of the proposed text changes in the "Availability of Service" section is to reduce the opportunity to omit a rate schedule from the tariff that should otherwise be subject to the ECR surcharge. There is no customer impact since no customers have applied for service under RTP.

The Standard Rate Rider RTP, Real-Time Pricing Rider, is offered as an optional three (3) year pilot program and is available as a rider to the Company's P.S.C. Electric No. 6, CTOD, ITOD, or IS rate schedules for customers having received service under those schedules for a minimum of one (1) year as of December 31, 2008. Although RTP is a Rate Rider, the proposed ECR verbiage specifically points to its application to Pilot Programs. This change is supported by the very nature of RTP. The standard rate schedule includes the charge to the customer for a baseline load but the ECR should reflect the customer's efforts to adjust that baseline load by applying it to the RTP charges.

LOUISVILLE GAS AND ELECTRIC COMPANY

Response to Commission Staff's First Information Request Dated July 12, 2011

Case No. 2011-00162

Question No. 12

Witness: John N. Voyles, Jr.

- Q-12. Refer to Exhibit JNV-2, the Environmental Air Compliance Strategy Summary, at page 7. The last paragraph states that preliminary studies showed that both wet FGDs at Mill Creek 1 and 2 could be modified to meet the expected minimum requirements for SO₂ removal, but that significant outages would be required to make structural upgrades. Provide a detailed cost comparison between modifying the FGDs at Mill Creek 1 and 2 as discussed above and building a new FGD to serve both units as proposed in the 2011 Compliance Plan.
- A-12. Engineering reviews performed subsequent to the preliminary studies identified significant concerns with the Unit 1 and 2 structures that support the FGDs. Please see the details contained in Appendix B of Exhibit JNV-2. In addition to the structural concerns, further assessments of the FGD subsystem components (i.e. conduits, cable trays, piping and mechanical equipment) concluded that the existing FGDs would essentially require a total rebuild after a systematic demolition. In addition to both FGDs requiring a substantial rebuild, ductwork leading to and from the FGDs would require total replacement. A detailed cost estimate was not performed as the scopes of rebuilding the existing FGDs is less than building a new single FGD to service both units. When adding the systematic demolition to salvage reusable structure and components, the overall scope for rebuilding the two existing units exceeded the scope for a single new FGD. In addition to the scope comparison, the rebuild of both existing FGDs would require a significant outage of two years or more on each unit to accomplish in comparison to building a single new FGD that would service both units while the existing FGDs remain in operation. Then, the new single FGD could be tied into the ductwork exiting the boilers within four weeks for each unit.

LOUISVILLE GAS AND ELECTRIC COMPANY

Response to Commission Staff's First Information Request Dated July 12, 2011

Case No. 2011-00162

Question No. 13

Witness: Daniel K. Arbough

Q-13. There appears to be evidence that credit markets have loosened. Discuss how LG&E will finance the proposed environmental compliance projects and explain whether it has received any indications of potential problems.

A-13. The credit markets are currently very attractive for solid investment grade utilities, particularly if the security being offered is a first mortgage bond. For example, LG&E was able to raise \$535 million at an average cost of under 4% in November 2010 with maturities of approximately 18 years in a transaction where demand exceeded the supply of bonds. More recently, on July 12, PPL Electric Utilities sold \$250 million of 30 year first mortgage bonds with a coupon of 5.20%, and investor demand for these bonds was very high.

The Company intends to finance the proposed environmental compliance projects with a mix of debt and equity that will allow it to maintain its strong investment grade bond ratings. Specifically, during construction we expect to utilize existing short-term lines of credit and commercial paper until outstanding balances are significant enough to justify issuing a long-term first mortgage bond. The first mortgage bonds will likely have a minimum size of \$250 million to allow the bonds to be "index eligible" making the bonds more marketable and therefore more attractive to investors. However, the Company will monitor the bond markets and will issue somewhat in advance if market conditions are favorable or will wait to issue if market conditions are particularly unattractive.

In addition to first mortgage bonds, when possible and if market conditions are attractive, the Company will utilize tax-exempt bonds. Currently, only costs associated with solid waste assets qualify for tax-exempt issuance which would comprise only a portion of the costs of the proposed facilities. It is important to note that the tax-exempt market has been negatively impacted by the poor financial condition of many municipal and state governments resulting in the taxable market frequently being more attractive for issuers than the tax-exempt market since 2008.

The equity to be utilized in funding the costs of the projects will be from a combination of retaining earnings and equity contributions from LG&E and KU Energy LLC, the Company's immediate parent. The equity contributions are expected to be of a size to allow the Company to maintain a capital structure similar to the existing structure.

The Company has not received any indications of potential problems funding the proposed program utilizing the above structure. This is a very typical financing model for utilities in the U.S. which has proven to be very reliable, even in the difficult times of the recent economic recession.

LOUISVILLE GAS AND ELECTRIC COMPANY

Response to Commission Staff's First Information Request Dated July 12, 2011

Case No. 2011-00162

Question No. 14

Witness: Daniel K. Arbough

- Q-14. Provide a copy of LG&E's latest reports from its bond rating agencies and any other reports from rating agencies and or banks which discuss any risks facing the company which will affect its ability to borrow the necessary project funds.
- A-14. The most recent bond rating agency reports for the Company are attached. The Company is not aware of reports issued by banks which discuss risks facing the Company in borrowing the necessary funds to construct the proposed projects.

**Attachment to KPSC Question No. 14 – Fitch Rating
Witness: Arbough**

Fitch Ratings

CORRECTION - FITCH ASSIGNS EXPECTED RTGS TO KY UTILITIES CO., LOUISVILLE G&E AND LG&E AND KU ENERGY

Fitch Ratings-New York-04 November 2010: (This is a correction for a release issued on Oct. 25, 2010. It amends the expected senior unsecured ratings for both Louisville Gas and Electric Company and Kentucky Utility Company to 'A'. In addition, the Issuer Default Ratings and short-term IDR's for all entities are now final and the Rating Outlooks Stable.)

Fitch Ratings expects to assign the ratings listed below to Kentucky Utilities Company (KU), Louisville Gas and Electric Company (LG&E), and LG&E and KU Energy LLC (currently E. ON U.S) following the close of PPL Corp.'s (Issuer Default Rating [IDR] 'BBB') acquisition of E.ON U.S. The expected ratings are as follows:

LG&E and KU Energy LLC

- Issuer Default Rating (IDR) 'BBB+';
- Senior unsecured debt 'BBB+';
- Short-term IDR 'F2'.

Kentucky Utilities Co.

- IDR 'A-';
- Secured debt 'A+';
- Senior unsecured debt 'A';
- Short-term IDR 'F2'.

Louisville Gas and Electric Co.

- IDR 'A-';
- Secured debt 'A+';
- Senior unsecured debt 'A';
- Short-term IDR 'F2'.

The proposed ratings reflect the currently sound credit quality of the two regulated utilities, PPL's balanced financing plan for completing the acquisition, constructive regulatory policies in Kentucky and the Kentucky Public Service Commission's (PSC) track record for timely rate decisions. Constructive regulatory policies include a monthly fuel adjustment clause and an environmental cost recovery (ECR) mechanism. The ECR mechanism substantially reduces the environmental risks associated with the companies' coal-fired generating portfolios. Regulatory statutes also include the inclusion of construction work in progress (CWIP) in rate base. Consequently, the utilities' investment in Trimble County unit 2 (TC2), a 760 mw coal plant expected to enter commercial operation by year-end, is already reflected in rate base. Moreover, the majority of its non-fuel operating costs were recognized in rates in the July 2010 rate order, which relied on a test year ended Oct. 31, 2009, at which time TC2 was already in testing mode and fully staffed. In July 2010, the two utilities each received constructive rate decisions from the Kentucky PSC that will enhance earnings and cash flow. The rate decisions were issued six months after the companies' filed their rate increase requests following a settlement agreement with intervenors.

The primary credit concerns, other than exposure to changing environmental regulations, is a provision in the change of control settlement that prohibits the companies from seeking a base rate adjustment that would be effective prior to Jan. 1, 2013 (excluding fuel and ECR adjustments), which will require the company to absorb cost increases in the interim, and the delay in commercial operation of TC2. Bumer malfunctions and a transformer failure occurred during commissioning and testing activity of TC2 conducted in the second and third quarter of 2010 causing a delay in TC2 commercial operation. The unit is now expected to enter commercial operation by year end. Because TC2 was constructed with a fixed price contract with liquidated damages, the two utilities

are not expected to incur any significant additional capital costs from the start-up delay.

On April 28, 2010, E.ON AG entered into a definitive agreement to sell PPL Corp. (PPL) its equity interests in E.ON U.S. LLC, the parent company of LG&E and KU. The cash purchase price, excluding the assumption of \$925 million of pollution control bonds, is approximately \$6.7 billion. In June 2010, PPL issued an aggregate of \$3.6 billion of common equity and hybrid securities to complete the equity and hybrid security portion of the acquisition financing plan, including \$1.15 billion of equity units and \$2.484 billion of common equity (net proceeds of \$1.116 billion and \$2.409 billion, respectively). The remaining cash purchase price of approximately \$3.175 billion will be funded with a draw on PPL's existing credit facility, to be repaid with the proceeds of subsidiary debt to be issued after closing the transaction and cash. Management has indicated it plans to issue approximately \$2.1 billion of first mortgage bonds at the two utilities and to retire a similar amount of existing inter-company borrowings. Consequently, debt levels should not be meaningfully different from the June 30, 2010 levels and going forward leverage and interest coverage measures should benefit from recently implemented rate increases as well as accessing the capital markets during a period of exceptionally low interest rates. Planned debt financing at LG&E and KU Energy LLC of approximately \$800 million is well below the existing parent inter-company borrowings of more than \$2 billion.

PPL expects to close the acquisition in the fourth quarter of 2010. On Sept. 2, 2010, PPL reached a settlement agreement with all intervening parties in its change of control application in Kentucky. In the settlement, PPL agreed not to raise base rates before Jan. 1, 2013 (excluding fuel and ECR adjustments). Rate increases that took effect on Aug. 1, 2010 will remain in place. The change of control agreement also provides for 50/50 sharing of any earnings above a 10.75% ROI. On Sept. 30, 2010, the Kentucky PSC approved the proposed acquisition subject to PPL's acceptance of all conditions. State regulators in Tennessee and Virginia have also approved the merger. Other required approvals include the Federal Energy Regulatory Commission (FERC). Pennsylvania Public Utility Commission (PUC) approval is not required.

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Applicable Criteria and Related Research:

--'Corporate Rating Methodology' (Nov. 24, 2009)

--'Credit Rating Guidelines for Regulated utility Companies' (July 31, 2007)

--'U.S. Power and Gas Comparative Operating Risk (COR) Evaluation and Financial Guidelines'

(Aug. 22, 2007)

Applicable Criteria and Related Research:

Corporate Rating Methodology

http://www.fitchratings.com/creditdesk/reports/report_frame.cfm?rpt_id=546646

Credit Rating Guidelines for Regulated Utility Companies

http://www.fitchratings.com/creditdesk/reports/report_frame.cfm?rpt_id=334652

U.S. Power and Gas Comparative Operating Risk (COR) Evaluation and Financial Guidelines

http://www.fitchratings.com/creditdesk/reports/report_frame.cfm?rpt_id=338030

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**Attachment to KPSC Question No. 14 – Standard & Pours, *Global Credit Portal* (LG&E)
dated March 22, 2011
Witness: Arbough**



Global Credit Portal RatingsDirect®

March 22, 2011

Louisville Gas & Electric Co.

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Rationale

CreditWatch

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Louisville Gas & Electric Co.

Major Rating Factors

Strengths:

- Stable and relatively predictable utility operations and associated cash flows;
- Credit-supportive regulatory environment in Kentucky;
- Competitive rates; and
- Efficient operations and high customer satisfaction ratings.

Corporate Credit Rating

BBB/Watch Neg/A-3

Weaknesses:

- Little fuel diversity; virtually all plants are coal-fired;
- Exposure to pending environmental standards, especially carbon dioxide; and
- Linked to parent credit quality.

Rationale

The ratings on vertically-integrated electric utility Louisville Gas & Electric Co. (LG&E) reflect the credit quality of ultimate parent PPL Corp., which, along with its affiliates LG&E, Kentucky Utilities Co. (KU), LG&E and KU Energy LLC (LKE), PPL Electric Utilities Corp. (PPLU), PPL Energy Supply LLC (PPL Energy), Western Power Distribution (South West) PLC, and Western Power Distribution (South Wales) PLC, are on CreditWatch with negative implications. Affiliate Western Power Distribution Holdings Ltd. is on CreditWatch with developing implications. The CreditWatch listings followed PPL's planned acquisition of E.ON UK's Central Networks West PLC (CNW) and Central Networks East PLC (CNE), two distribution networks in the U.K. The CreditWatch listing directly relates to the execution of the financing plan for the acquisition, which includes a commitment by the company for a substantial issuance of equity. Resolution of the CreditWatch will depend on the company's ability to complete its financing activities consistent with our expectations for the 'BBB' ratings.

Allentown, Pa.-based PPL has about \$13.4 billion of debt, including \$1.63 billion of junior subordinated notes.

PPL's purchase price of the Central Networks utilities includes the assumption of \$800 million of public debt and cash of \$5.6 billion (excluding related transaction expenses and fees) that it will initially fund through a bridge loan and ultimately through a combination of cash, common equity issuance at PPL, unsecured debt at CNW and CNE, and unsecured debt at an intermediate holding company (generically UK Holdings) that will own CNW and CNE. In addition, PPL will issue equity units at PPL Capital Funding, which will likely receive high equity credit under our rating criteria. This acquisition will raise PPL's regulated cash flows to about 75% from the current 60%. Before PPL bought the Kentucky utilities, its regulated cash flows were less than 30%. The ratings change reflects our revisions, in accordance with our criteria, of PPL's business risk profile to excellent from strong (we categorize business risk profiles as excellent to vulnerable) and the company's financial risk profile to aggressive from significant (we rank financial profiles from minimal to highly leveraged).

The excellent business profile reflects the addition of fully regulated distribution utilities that have credit-supportive U.K. regulation and no commodity exposure, since power for retail customers is procured by nonaffiliated retail suppliers. The Central Networks utilities are contiguous to PPL's existing U.K. utilities. After the acquisition of CNE

and CNW, we expect U.K. operations to be about 30% of PPL's consolidated cash flow. With this transaction, we are viewing all of PPL's utility assets as part of a consolidated entity, whereas previously we considered only the quality of the utility's dividends to its parent. The stability of CNE and CNW along with existing utility assets in the U.K., Kentucky, and Pennsylvania, which we assess as excellent, will more than offset the satisfactory business risk profile of PPL Energy's merchant generation, resulting in a consolidated business profile of excellent. We expect the merchant generation business to contribute less than 25% of pro forma consolidated cash flows.

LG&E's consolidated business risk profile, which we consider excellent, reflects the strengths of serving electric and natural gas customers in the Louisville area. The utility's strengths include relatively predictable utility operations with steady cash flows, constructive cost recovery, and relatively low rates stemming from low-cost coal-fired generation. Although generation is mostly coal-fired, the plants meet current environmental requirements and have a significant amount of capital spending through 2014 that they should be able to recover through rates.

As LG&E's financial risk profile reflects that of PPL's consolidated profile, we consider it as aggressive. Our revision of the financial risk profile to aggressive reflects in part the company's financial policies toward acquisitions, including funding with aggressive levels of hybrid securities. Furthermore, due to the company's strategy of focusing on fully regulated operations and also expanding its U.K. presence, we are incorporating consolidated financial measures for PPL in our analysis. When reviewing the financial metrics, we are now including all cash flows and debt obligations from the U.K. utilities and PPLEU in PPL's financial measures. We expect consolidated financial measures, including ratios of debt to EBITDA, funds from operations (FFO) to total debt, and debt to capital, to range in the aggressive category of our financial risk profile. Debt to EBITDA should range between 4x and 5x, while we expect the percentage of FFO to debt to be in the mid-teens. These measures will support ratings at the 'BBB' level when the company successfully completes the permanent financing.

Short-term credit factors

LG&E's short-term rating is A-3. The utility's liquidity position reflects that of PPL. We consider PPL's liquidity strong under Standard & Poor's corporate liquidity methodology, which categorizes liquidity in five standard descriptors. Liquidity supports PPL's 'BBB+' issuer credit rating. Projected sources of liquidity, mainly operating cash flow and available bank lines, exceed projected uses, mainly necessary capital expenditures, debt maturities, and common dividends, by more than 1.5x. Sources over uses would be positive even after a 50% EBITDA decline. Further supporting our description of liquidity as strong is PPL's ability to absorb high-impact, low-probability events with limited need for refinancing, its flexibility to lower capital spending, its sound bank relationships, its solid standing in credit markets, and generally prudent risk management.

Recovery analysis

We assign recovery ratings to First Mortgage Bonds (FMBs) issued by investment-grade U.S. utilities, which can result in issue ratings being notched above a utility's corporate credit rating (CCR) depending on the CCR category and the extent of the collateral coverage. The investment-grade FMB recovery methodology is based on the ample historical record of nearly 100% recovery for secured bondholders in utility bankruptcies and our view that the factors that supported those recoveries (limited size of the creditor class and the durable value of utility rate-based assets during and after a reorganization given the essential service provided and the high replacement cost) will persist in the future. Under our notching criteria, we consider the limitations of FMB issuance under the utility's indenture relative to the value of the collateral pledged to bondholders, management's stated intentions on future FMB issuance, as well as the regulatory limitations on bond issuance when assigning issue ratings to utility FMBs. FMB ratings can exceed a utility's CCR by up to one notch in the 'A' category, two notches in the 'BBB' category,

and three notches in speculative-grade categories.

LG&E's FMBs benefit from a first-priority lien on substantially all of the utility's real property owned or subsequently acquired. Collateral coverage of about 1.5x supports a recovery rating of 1+ and an issue rating two notches above the CCR.

CreditWatch

The CreditWatch listing will remain until the company demonstrates progress on the permanent financing plan in line with our expectations. The acquisition requires large permanent financing that has attendant execution risks, and we will monitor PPL's ability to finalize this permanent financing. We could remove the CreditWatch listing and assign a stable outlook if financing is consistent with our expectation. We could lower the ratings if PPL can't fully execute its permanent financing plan in a credit-supportive manner consistent with our expectations for 'BBB' ratings.

Related Criteria And Research

- 2008 Corporate Criteria: Analytical Methodology
- Criteria Methodology: Business Risk/Financial Risk Matrix Expanded
- 2008 Corporate Criteria: Ratios And Adjustments
- Methodology And Assumptions: Standard & Poor's Standardizes Liquidity Descriptors For Global Corporate Issuers

Financial figures are not available because the company's figures are not currently public.

PPL Corp. -- Peer Comparison*

Industry Sector: Energy

	PPL Corp.	FirstEnergy Corp.	Public Service Enterprise Group Inc.	Ameren Corp.
Rating as of March 17, 2011	BBB/Watch Neg/--	BBB-/Stable/--	BBB/Stable/A-2	BBB-/Stable/A-3
--Average of past three fiscal years--				
(Mil. \$)				
Revenues	5,285.6	13,266.0	11,995.5	7,522.3
Net income from cont. oper.	483.9	1,044.0	1,466.6	452.0
Funds from operations (FFO)	1,560.7	2,675.2	2,494.4	1,836.9
Capital expenditures	1,177.4	2,352.5	1,874.5	1,668.3
Cash and short-term investments	721.6	812.7	290.2	419.7
Debt	8,598.5	17,675.4	8,875.7	9,223.1
Preferred stock	333.3	0.0	53.3	88.7
Equity	4,776.7	8,451.0	8,533.8	7,619.0
Debt and equity	13,375.2	26,126.4	17,409.5	16,842.1
Adjusted ratios				
EBIT interest coverage (x)	2.7	2.4	6.2	3.0
FFO int. cov. (X)	4.8	3.2	6.0	4.6
FFO/debt (%)	18.2	15.1	28.1	19.9

PPL Corp. -- Peer Comparison* (cont.)

Discretionary cash flow/debt (%)	(1.2)	(2.5)	1.0	(2.8)
Net cash flow / capex (%)	86.6	85.2	97.1	85.0
Total debt/debt plus equity (%)	64.3	67.7	51.0	54.8
Return on common equity (%)	12.7	10.9	17.5	5.6
Common dividend payout ratio (un-adj.) (%)	111.4	64.2	46.0	95.0

*Fully adjusted (including postretirement obligations) N M - Not Meaningful

Ratings Detail (As Of March 22, 2011)***Louisville Gas & Electric Co.**

Corporate Credit Rating	BBB/Watch Neg/A-3
Senior Secured (11 Issues)	A-/A-3
Senior Secured (1 Issue)	A-/NR
Senior Secured (2 Issues)	A-/Watch Neg

Corporate Credit Ratings History

21-Mar-2011	BBB/Watch Neg/A-3
02-Mar-2011	BBB/Watch Neg/NR
07-Jul-2004	BBB+/Stable/NR

Business Risk Profile

Excellent

Financial Risk Profile

Aggressive

Related Entities**Kentucky Utilities Co.**

Issuer Credit Rating	BBB/Watch Neg/A-3
Senior Secured (5 Issues)	A-/A-3
Senior Secured (2 Issues)	A-/NR
Senior Secured (3 Issues)	A-/Watch Neg

LG&E and KU Energy LLC

Issuer Credit Rating	BBB/Watch Neg/--
Senior Unsecured (2 Issues)	BBB-/Watch Neg

PPL Corp.

Issuer Credit Rating	BBB/Watch Neg/NR
Junior Subordinated (2 Issues)	BB+/Watch Neg
Senior Unsecured (3 Issues)	BBB-/Watch Neg

PPL Electric Utilities Corp.

Issuer Credit Rating	BBB/Watch Neg/A-3
Commercial Paper	
Local Currency	A-3/Watch Neg
Preference Stock (1 Issue)	BB+/Watch Neg
Senior Secured (8 Issues)	BBB+/Watch Neg

PPL Energy Supply LLC

Issuer Credit Rating	BBB/Watch Neg/NR
Senior Unsecured (12 Issues)	BBB/Watch Neg

PPL Montana LLC

Senior Secured (1 Issue)	BBB-/Positive
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Ratings Detail (As Of March 22, 2011)* (cont.)

Western Power Distribution Holdings Ltd.

Issuer Credit Rating	BBB-/Watch Dev/A-3
Senior Unsecured (2 Issues)	BBB-/Watch Neg

Western Power Distribution (South Wales) PLC

Issuer Credit Rating	BBB/Watch Neg/A-3
Senior Unsecured (3 Issues)	BBB/Watch Neg

Western Power Distribution (South West) PLC

Issuer Credit Rating	BBB/Watch Neg/A-3
Senior Unsecured (4 Issues)	BBB/Watch Neg

*Unless otherwise noted, all ratings in this report are global scale ratings. Standard & Poor's credit ratings on the global scale are comparable across countries. Standard & Poor's credit ratings on a national scale are relative to obligors or obligations within that specific country.

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**Attachment to KPSC Question No. 14 – Standard & Poor’s, Global Credit Portal (LG&E and
KU Energy LLC) dated March 22, 2011
Witness: Arbough**



Global Credit Portal RatingsDirect®

March 22, 2011

LG&E and KU Energy LLC

Primary Credit Analyst:

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Major Rating Factors

Strengths:

- Owns utilities that produce stable and predictable cash flows;
- Utilities have a credit-supportive regulatory environment in Kentucky;
- Utilities have competitive rates; and
- Utilities have efficient operations and high customer satisfaction ratings.

Corporate Credit Rating

BBB/Watch Neg/-

Weaknesses:

- Utilities have little fuel diversity; virtually all are coal-fired;
- Utilities have exposure to pending environmental standards, especially carbon dioxide; and
- Linked to parent credit quality.

Rationale

The ratings on intermediate holding company LG&E and KU Energy LLC (LKE) reflect parent PPL Corp.'s consolidated credit profile that, along with its affiliates LKE, Kentucky Utilities Co. (KU), Louisville Gas & Electric Co. (LG&E), PPL Electric Utilities Corp. (PPLEU), PPL Energy Supply LLC (PPL Energy), Western Power Distribution (South West) PLC, and Western Power Distribution (South Wales) PLC, are on CreditWatch with negative implications. Affiliate Western Power Distribution Holdings Ltd. is on CreditWatch with developing implications. The CreditWatch listings followed PPL's planned acquisition of E.ON UK's Central Networks West PLC (CNW) and Central Networks East PLC (CNE), two distribution networks in the U.K. The CreditWatch listing directly relates to the execution of the financing plan for the acquisition, which includes a commitment by the company for a substantial issuance of equity. Resolution of the CreditWatch will depend on the company's ability to complete its financing activities consistent with our expectations for the 'BBB' ratings.

Allentown, Pa.-based PPL has about \$13.4 billion of debt, including \$1.63 billion of junior subordinated notes.

PPL's purchase price of Central Networks utilities includes the assumption of \$800 million of public debt and cash of \$5.6 billion (excluding related transaction expenses and fees) that it will fund initially through a bridge loan and ultimately through a combination of cash, common equity issuance at PPL, unsecured debt at CNW and CNE, and unsecured debt at an intermediate holding company (generically UK Holdings) that will own CNW and CNE. In addition, PPL will issue equity units at PPL Capital Funding, which will likely receive high equity credit under our rating criteria. This acquisition will raise PPL's regulated cash flows to about 75% from the current 60%. Before PPL bought the Kentucky utilities, its regulated cash flows were less than 30%. The ratings change reflects our revisions, in accordance with our criteria, of PPL's business risk profile to excellent from strong (we categorize business risk profiles as excellent to vulnerable) and the company's financial risk profile to aggressive from significant (we rank financial profiles from minimal to highly leveraged).

The excellent business profile reflects the addition of fully regulated distribution utilities that have credit-supportive U.K. regulation and no commodity exposure, since power for retail customers is procured by nonaffiliated retail suppliers. The Central Networks utilities are contiguous to PPL's existing U.K. utilities. After the acquisition of CNE

and CNW, we expect U.K. operations to be about 30% of PPL's consolidated cash flow. With this transaction, we are viewing all of PPL's utility assets as part of a consolidated entity, whereas previously we considered only the quality of the utility's dividends to its parent. The stability of CNE and CNW along with existing utility assets in the U.K., Kentucky, and Pennsylvania, which we assess as excellent, will more than offset the satisfactory business risk profile of PPL Energy's merchant generation, resulting in a consolidated business profile of excellent. We expect the merchant generation business to contribute less than 25% of pro forma consolidated cash flows.

LKE's business risk profile incorporates the strengths of subsidiaries LG&E and KU that serve electric and natural gas customers scattered throughout Kentucky, including Louisville and Lexington. The strengths of these utilities include relatively predictable utility operations with steady cash flows, constructive cost recovery, and relatively low rates derived from low-cost coal-fired generation. Although generation is mostly coal-fired, the plants meet current environmental requirements and have a significant amount of capital spending through 2014 that the company should be able to recover through rates.

As LKE's financial risk profile reflects that of PPL's consolidated profile, we consider it as aggressive. Our revision of the financial risk profile to aggressive reflects in part the company's financial policies toward acquisitions, including funding with aggressive levels of hybrid securities. Furthermore, due to the company's strategy of focusing on fully regulated operations and also expanding its U.K. presence, we are incorporating consolidated financial measures for PPL in our analysis. When reviewing the financial metrics, we are now including all cash flows and debt obligations from the U.K. utilities and PPLEU in PPL's financial measures. We expect consolidated financial measures, including ratios of debt to EBITDA, funds from operations (FFO) to total debt, and debt to capital, to range in the aggressive category of our financial risk profile. Debt to EBITDA should range between 4x and 5x, while we expect the percentage of FFO to debt to be in the mid-teens. These measures will support ratings at the 'BBB' level when the company successfully completes the permanent financing.

Short-term credit factors

LKE's liquidity position reflects that of PPL. We consider PPL's liquidity strong under Standard & Poor's corporate liquidity methodology, which categorizes liquidity in five standard descriptors. Liquidity supports PPL's 'BBB+' issuer credit rating. Projected sources of liquidity, mainly operating cash flow and available bank lines, exceed projected uses, mainly necessary capital expenditures, debt maturities, and common dividends, by more than 1.5x. Sources over uses would be positive even after a 50% EBITDA decline. Additional factors that support the liquidity are PPL's ability to absorb high-impact, low-probability events with limited need for refinancing, its flexibility to lower capital spending, its sound bank relationships, its solid standing in credit markets, and generally prudent risk management.

Credit Watch

The Credit Watch listing will remain until the company demonstrates progress on its permanent financing plan in line with our expectations. The acquisition requires large permanent financing that has attendant execution risks, and we will monitor PPL's ability to finalize this permanent financing. We could remove the Credit Watch listing and assign a stable outlook if financing is consistent with our expectation. We could lower the ratings if PPL can't fully execute its permanent financing plan in a credit-supportive manner consistent with our expectations for 'BBB' ratings.

Related Criteria And Research

- 2008 Corporate Criteria: Analytical Methodology
- Criteria Methodology: Business Risk/Financial Risk Matrix Expanded
- 2008 Corporate Criteria: Ratios And Adjustments
- Methodology And Assumptions: Standard & Poor's Standardizes Liquidity Descriptors For Global Corporate Issuers

Financial figures are not available because the company's figures are not currently public.

Ratings Detail (As Of March 22, 2011)*	
LG&E and KU Energy LLC	
Corporate Credit Rating	BBB/Watch Neg/--
Senior Unsecured (2 Issues)	BBB-/Watch Neg
Corporate Credit Ratings History	
02-Mar-2011	BBB/Watch Neg/--
04-Aug-2003	BBB+/Stable/--
12-Sep-2002	A-/Stable/--
Business Risk Profile	Excellent
Financial Risk Profile	Aggressive
Related Entities	
Kentucky Utilities Co.	
Issuer Credit Rating	BBB/Watch Neg/A-3
Senior Secured (5 Issues)	A-/A-3
Senior Secured (2 Issues)	A-/NR
Senior Secured (3 Issues)	A-/Watch Neg
Louisville Gas & Electric Co.	
Issuer Credit Rating	BBB/Watch Neg/A-3
Senior Secured (11 Issues)	A-/A-3
Senior Secured (1 Issue)	A-/NR
Senior Secured (2 Issues)	A-/Watch Neg
PPL Corp.	
Issuer Credit Rating	BBB/Watch Neg/NR
Junior Subordinated (2 Issues)	BB+/Watch Neg
Senior Unsecured (3 Issues)	BBB-/Watch Neg
PPL Electric Utilities Corp.	
Issuer Credit Rating	BBB/Watch Neg/A-3
Commercial Paper	
<i>Local Currency</i>	A-3/Watch Neg
Preference Stock (1 Issue)	BB+/Watch Neg
Senior Secured (8 Issues)	BBB+/Watch Neg
PPL Energy Supply LLC	
Issuer Credit Rating	BBB/Watch Neg/NR
Senior Unsecured (12 Issues)	BBB/Watch Neg

Ratings Detail (As Of March 22, 2011) (cont.)

PPL Montana LLC

Senior Secured (1 Issue) BBB-/Positive

Western Power Distribution Holdings Ltd.

Issuer Credit Rating BBB-/Watch Dev/A-3

Senior Unsecured (2 Issues) BBB-/Watch Neg

Western Power Distribution (South Wales) PLC

Issuer Credit Rating BBB/Watch Neg/A-3

Senior Unsecured (3 Issues) BBB/Watch Neg

Western Power Distribution (South West) PLC

Issuer Credit Rating BBB/Watch Neg/A-3

Senior Unsecured (4 Issues) BBB/Watch Neg

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**Attachment to KPSC Question No. 14 – Moody’s Investors Services, Credit Option (LG&E)
dated January 29, 2010
Witness: Arbough**



Moody's Investors Service

Global Credit Research
Credit Opinion
29 JAN 2010

Credit Opinion: Louisville Gas & Electric Company

Louisville Gas & Electric Company

Louisville, Kentucky, United States

Ratings

Category	Moody's Rating
Outlook	Stable
Issuer Rating	A2
Ult Parent: E.ON AG	
Outlook	Stable
Senior Unsecured -Dom Curr	A2
Commercial Paper	P-1
Parent: E. ON U.S. LLC	
Outlook	Stable
Issuer Rating	A3

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Opinion

Rating Drivers

E.ON AG ownership strengthens LG&E's financial position

Regulatory compact allows for the timely recovery of costs

Elevated capital expenditure spending program

Ability to manage a successful outcome for a recently filed rate case

Corporate Profile

Louisville Gas and Electric Company (LG&E) is a regulated public utility engaged in the generation, transmission and distribution of electricity and the storage, distribution and sale of natural gas. It provides electricity to approximately 389,000 customers in Louisville and adjacent areas and natural gas service to approximately 314,000 customers. LG&E's coal-fired electric generating plants produce most of its electricity.

LG&E is a wholly-owned subsidiary of E.ON U.S. LLC (A3 Issuer Rating). E.ON U.S. is an indirect wholly-owned subsidiary of German-based E.ON AG (A2 senior unsecured). LG&E's affiliate Kentucky Utilities (KU: A2 Issuer Rating), is a regulated public utility also operating in Kentucky. Although LG&E and KU are separate legal entities, they are operated as a single, fully integrated system and provide the majority of the consolidated earnings and cash flow of E.ON U.S. LLC.

SUMMARY RATING RATIONALE

Moody's evaluates LG&E's consolidated financial performance relative to the Regulated Electric and Gas Utilities rating methodology published in August 2009 and as depicted in the grid below, LG&E's indicated rating under this methodology is A3 compared to its A2 senior unsecured rating.

LG&E receives a one notch rating lift from its ownership by E.ON AG. Specifically, E.ON AG's size, scale and credit profile has historically provided LG&E considerable liquidity and financial flexibility primarily in the form of inter-company funding that in our opinion strengthens LG&E's financial position. Inter-company debt accounted for

approximately 60% of LG&E's approximate \$1.0 billion of debt at September 30, 2009.

The ratings and outlook of LG&E could be affected if E.ON AG's senior unsecured rating were to be downgraded from its current level.

In addition to its ownership by E.ON AG, LG&E's A2 senior unsecured rating reflects its historical financial metrics combined with regulatory supportiveness provided by the Kentucky Public Service Commission (KPSC) and its historical ability to recover costs in a timely manner.

STRONG FINANCIAL PROFILE

While down slightly from prior levels due to inter-company debt incurred to fund the construction of its new Trimble 2 generating facility, LG&E's key financial metrics remain within a notch of its current rating. Specifically, LG&E's ratio of consolidated cash flow before changes in working capital (CFO pre W/C) to debt and CFO pre-W/C interest coverage for the twelve months ended September 30, 2009 were approximately 27% and 6 times, respectively.

In January 2009, a significant winter ice storm passed through LG&E's service territory causing approximately 205,000 customer outages, followed closely by a severe wind storm in February 2009, causing approximately 37,000 customer outages. LG&E incurred \$44 million of incremental operation and maintenance expenses and \$10 million of capital expenditures related to the restoration following the two storms. LG&E has been allowed by the KPSC to establish a regulatory asset for its 2009 storm costs and has requested recovery of these costs over a five-year period.

CONSTRUCTIVE REGULATORY ENVIRONMENT

LG&E has an environmental cost recovery mechanism in its electric rates that allows for the recovery of environmental costs, including a 10.63% return on equity. This is an important factor given that KU and LG&E's combined environmental capital spending has been estimated to be approximately \$700 million in aggregate during the three-year period ending 2011. Proceedings are conducted every two years to evaluate the operation of the environmental cost recovery mechanism. The utilities also benefit from a fuel adjustment clause that eliminates supply cost volatility.

LG&E filed a rate case in January 2010 requesting a \$94.6 million or 12.1% base electric rate increase and a \$22.6 million or 7.7% natural gas base rate increase with a proposed effective date of March 1, 2010. The rate increase is needed to cover increased costs, to provide a return on the company's considerable investment in its infrastructure, primarily Trimble 2, and to recovery costs associated with the storm restorations. The KPSC has the ability to suspend the proposed rate increase for up to 6 months. The current weak statewide economic environment could present a challenge for LG&E in its efforts to manage a successful rate outcome

LARGE CAPITAL EXPENDITURE PROGRAM

The company is nearing construction completion of the new 750-megawatt Trimble 2 coal-fired generating station of which LG&E and KU own undivided 14.25% and 60.75% interests, respectively. The remaining 25% interest is owned by regional municipal power entities. The generating station is expected to begin commercial operation during the summer of 2010 at a total cost to KU and LG&E of approximately \$900 million.

LG&E's capital expenditures are still expected to remain significant going forward, estimated at \$690 million for the three year period ending December 31, 2011 compared to approximately \$600 million during the three year period ended December 31, 2008. Incremental inter-company funding is anticipated in order to finance in part these expenditures.

Liquidity

LG&E's external sources for liquidity includes \$125 million of bilateral lines of credit with third party lenders due June 2012 and an inter-company money pool agreement where E.ON U.S. and/or KU make up to \$400 million of funds available to LG&E. LG&E's borrowing under the inter-company money pool at September 30, 2009 was \$149 million. There were no borrowings under the bilateral line of credit, which is used to backstop a similar amount of pollution control revenue bonds that are subject to tender for purchase at the option of the holder.

E.ON U.S. maintains revolving credit facilities totaling \$313 million at September 30, 2009 with affiliated companies to ensure funding availability for the money pool.

Rating Outlook

The stable rating outlook reflects Moody's expectation that LG&E will continue to show strong fundamentals and that inter-company funding support will continue to be provided by E.ON AG.

What Could Change the Rating - Up

In light of LG&E's sizeable expenditure program, limited prospects exist for the rating to be upgraded over the next several years. Longer-term, core financial metrics would need to improve considerably, such as CFO pre W/C to debt greater than 30%, for Moody's to consider an upgrade.

What Could Change the Rating - Down

Moody's would consider a rating downgrade if E. ON AG's senior unsecured rating was downgraded from its current A2 level, if inter-company funding support was discontinued or significant changes were made to the environmental cost recovery mechanism or if CFO pre-W/C declined to below 15%.

Rating Factors

Louisville Gas & Electric Company

Regulated Electric and Gas Utilities	Aaa	Aa	A	Baa	Ba	B
Factor 1: Regulatory Framework (25%)				X		
Factor 2: Ability to Recover Costs and Earn Returns (25%)			X			
Factor 3: Diversification (10%)						
a) Market Position (5%)				X		
b) Generation and Fuel Diversity (5%)					X	
Factor 4: Financial Strength, Liquidity and Key Financial Metrics (40%)						
a) Liquidity (10%)			X			
b) CFO pre-WC + Interest / Interest (7.5%) (3yr Avg)			X			
c) CFO pre-WC / Debt (7.5%) (3yr Avg)			X			
d) CFO pre-WC - Dividends / Debt (7.5%) (3yr Avg)				X		
e) Debt / Capitalization or Debt / RAV (7.5%) (3yr Avg)			X			
Rating:						
a) Methodology Implied Senior Unsecured Rating				A3		
b) Actual Senior Unsecured Rating				A2		

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**Attachment to KPSC Question No. 14 – Moody’s Investors Services, Rating
dated November 9, 2010**

Witness: Arbough

MOODY'S
INVESTORS SERVICE

Rating Action:

Approximately \$2.9 billion of debt securities affected

New York, November 09, 2010 – Moody's Investors Service has assigned ratings of A2 to \$1,500 million of first mortgage bonds issued by Kentucky Utilities Company (KU: Baa1 Issuer Rating) and \$535 million of first mortgage bonds issued by Louisville Gas and Electric Company (LG&E: Baa1 Issuer Rating). Moody's also assigned a Baa2 rating to \$875 million of senior unsecured notes issued by their intermediate parent holding company, LG&E and KU Energy LLC (LKE: Baa2 Issuer Rating). The rating outlooks for KU, LG&E and LKE are stable.

Assignments:

..Issuer: Kentucky Utilities Co.

....Senior Secured First Mortgage Bonds, Assigned A2

..Issuer: LG&E and KU Energy LLC

....Senior Unsecured Regular Bond/Debenture, Assigned Baa2

..Issuer: Louisville Gas & Electric Company

....Senior Secured First Mortgage Bonds, Assigned A2

RATINGS RATIONALE

Proceeds from these offerings will be used to repay intercompany debt arising from PPL Corporation's (PPL: Baa3 senior unsecured) acquisition of LKE and its subsidiaries on November 1, 2010 for approximately \$7.625 billion.

KU and LG&E's Issuer Ratings are supported by their sound financial performance and the supportive regulatory environment in which they operate offset in part by a lack of fuel diversity and modestly sized service territories. It is Moody's policy to generally rate first mortgage bonds of investment-grade rated utilities two alpha-numeric ratings higher than its Issuer Rating or senior unsecured debt rating. The Baa2 rating assigned to LKE's senior unsecured debt is the same as its Issuer Rating and one-notch below KU and LG&E's Issuer Ratings due to the structural subordination of its debt to the debt issued at its utility subsidiaries.

Please refer to Moody's.com for additional research relating to KU, LG&E and LKE.

The principal methodology used in this rating was *Regulated Electric and Gas Utilities* published in August 2009.

PPL is a diversified energy holding company headquartered in Allentown, Pennsylvania.

REGULATORY DISCLOSURES

Information sources used to prepare the credit rating are the following: parties involved in the ratings, parties not involved in the ratings, public information, confidential and proprietary Moody's Investors Service information, and confidential and proprietary Moody's Analytics information.

Moody's Investors Service considers the quality of information available on the issuer or obligation satisfactory for the purposes of assigning a credit rating.

Moody's adopts all necessary measures so that the information it uses in assigning a credit rating is of sufficient quality and from sources Moody's considers to be reliable including, when appropriate, independent third-party sources. However, Moody's is not an auditor and cannot in every instance independently verify or validate information received in the rating process.

Please see ratings tab on the issuer/entity page on Moody's.com for the last rating action and the rating history.

The date on which some Credit Ratings were first released goes back to a time before Moody's Investors Service's Credit Ratings were fully digitized and accurate data may not be available. Consequently, Moody's Investors Service provides a date that it believes is the most reliable and accurate based on the information that is available to it. Please see the ratings disclosure page on our website www.moody's.com for further information.

Please see the Credit Policy page on Moody's.com for the methodologies used in determining ratings, further information on the meaning of each rating category and the definition of default and recovery.

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MOODY'S
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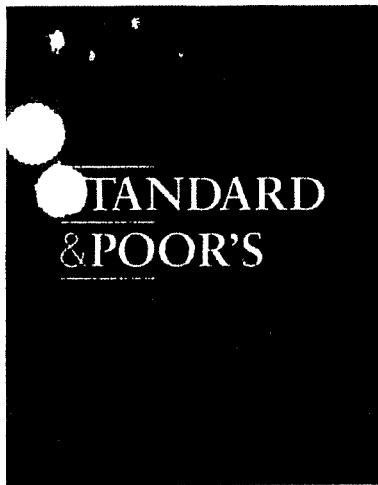
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This credit rating is an opinion as to the creditworthiness or a debt obligation of the issuer, not on the equity securities of the issuer or any form of security that is available to retail investors. It would be dangerous for retail investors to make any investment decision based on this credit rating. If in doubt you should contact your financial or other professional adviser.

Attachment to KPSC Question No. 14 – Standard & Pours, *Global Credit Portal* (E.ON U. S. LLC) dated May 6, 2010
Witness: Arbough



Global Credit Portal RatingsDirect®

May 6, 2010

E.ON U.S. LLC

Primary Credit Analyst:

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Major Rating Factors

Rationale

Outlook

Related Criteria And Research

E.ON U.S. LLC

Major Rating Factors

Strengths:

- Stable and relatively predictable utility operations and associated cash flows;
- Credit supportive regulatory environment in Kentucky;
- Competitive rates; and
- Efficient operations and high customer satisfaction ratings.

Corporate Credit Rating

BBB+/Stable/--

Weaknesses:

- Little fuel diversity; virtually all coal-fired;
- Heavy construction program;
- Rate relief needs during a time of unusual economic weakness; and
- Somewhat weak consolidated financial metrics.

Rationale

Our ratings on E.ON U.S. are currently based on the credit profile of its two operating utilities in Kentucky, Louisville Gas & Electric (LG&E) and Kentucky Utilities (KU) and the company's focus on operating the fully integrated utilities. Current ratings are linked to ultimate parent E.ON AG (A/Stable/A-1).

On April 28, 2010, PPL Corp. announced its plan to acquire E.ON U.S. for \$7.625 billion in cash. The transaction includes the assumption of \$574 million of tax-exempt debt at LGE and \$351 million of tax-exempt debt at KU. The acquisition requires approvals by state regulators in Kentucky, Virginia and Tennessee, and by the FERC. The transaction is expected to close by the end of 2010.

The inclusion of LG&E and KU into PPL will rebalance PPL's portfolio toward a greater regulated mix. With regulated operations contributing 60%-65% of the overall cash flow post acquisition compared with about 30% in 2009, the "excellent" business risk profile of the utility businesses will more than offset the "satisfactory" business risk profile of the generation business. This will result in a pro forma "strong" consolidated business risk profile. We expect consolidated debt to EBITDA and total debt to total capital ratios to range in the "significant" financial risk profile category. Projected FFO to total debt of 23.5%-25% will likely support ratings at the higher end of the 'BBB' rating category on successful completion of the acquisition.

The acquisition requires large permanent financing that has attendant execution risks. If the transaction with PPL is not ultimately consummated, we will affirm the 'BBB+' ratings on E.ON U.S., LG&E, and KU.

We view E.ON U.S.'s consolidated business risk profile as 'excellent' (we categorize business risk profiles as 'excellent' to 'vulnerable') and its financial profile as 'aggressive' (financial profiles are ranked from 'minimal' to 'highly leveraged'). The company's business risk profile is supported by relatively low-risk, regulated vertically integrated electric and natural gas distribution operations, a stable and credit supportive regulatory environment in Kentucky, efficient generation facilities that allow for competitive rates, consistently high customer satisfaction rankings, and effective cost containment. The company's electric operations benefit from a fuel and purchased power (energy only) adjustment clause, an environmental cost recovery surcharge, and other timely cost recovery

mechanisms, while its smaller gas operations benefit from a gas supply clause. These strengths are tempered by the lack of fuel diversity (nearly all coal-fired), a relatively heavy construction program, and rate relief needs during a period of unusual economic weakness. Construction outlays focus on the company's 75% ownership share in the 750 MW Trimble County Unit 2 coal-fired facility that's slated for completion later this year, ongoing environmental requirements, and other project betterments.

On July 16, 2009, the power plant lease arrangement between E.ON U.S.'s subsidiary Western Kentucky Energy Corp. and Big Rivers Electric Corp. was terminated. While unwinding of the contract required a large one-time cash payment of \$575 million and other concessions, it significantly reduces E.ON U.S.'s dependence on riskier unregulated activities, and enhances the company's business risk profile within the "excellent" category.

Currently pending before the Kentucky Public Service Commission are rate applications for a \$94.6 million (12.1%) electric rate hike and a \$22.6 million (7.7%) natural gas rate increase for LG&E and a \$135 million (11.5%) electric rate hike for KU. The rate requests are predicated upon an 11.5% return on equity. Commission orders are expected this summer. Higher rates are needed to recover the utilities' investment in Trimble County Unit 2, damage costs related to severe storms, and higher costs. The fact that the state regulators will be reviewing somewhat large rate hike requests in a weakened economy is a credit concern. Therefore, the company's ability to manage regulatory risk will be critical to credit quality.

E.ON U.S.'s consolidated financial metrics have declined somewhat, owing primarily to its heavy construction program. However, with well controlled operating and maintenance expenses, continued efficient operations, responsive regulatory treatment, and credit supportive actions by management, bondholder protection parameters should strengthen to levels more commensurate with the current rating level.

Short-term credit factors

Standard & Poor's expects E.ON U.S.'s capital spending to exceed cash flow from operations primarily because of significant environmental expenditures and outlays to complete the Trimble County Unit 2 station. The steady internal cash flow generated by KU's and LG&E's regulated operations will not be enough to meet these obligations, thus creating a reliance on outside capital. Such funding is expected to be concentrated at Germany-based parent E.ON AG, which will also provide support in the case of short-term liquidity needs. (An E.ON AG-related entity provides a credit facility to E.ON U.S. to ensure funding availability for its money pool.

Outlook

The stable outlook on E.ON U.S. is based on corporate strategy that maintains a primarily low-risk, utility-based business risk profile. Standard & Poor's could lower the ratings absent future sufficient rate relief, if construction expenditures materially increase resulting in higher-than-expected reliance on debt, and if cash flow metrics erode. In light of a prospectively heavy capital program and subpar financial metrics, higher ratings are not envisioned in the foreseeable future.

Related Criteria And Research

- "2008 Corporate Criteria: Analytical Methodology," April 15, 2008.
- "Criteria Methodology: Business Risk/Financial Risk Matrix Expanded," May 27, 2009.

E.ON U.S. is a private company and does not release financial information publicly.

Ratings Detail (As Of May 6, 2010)*
E.ON U.S. LLC

Corporate Credit Rating BBB+/Stable/--

Corporate Credit Ratings History

04-Aug-2003 BBB+/Stable/--
 12-Sep-2002 A-/Stable/--
 09-Apr-2001 BBB+/Watch Pos/--

Business Risk Profile Excellent

Financial Risk Profile Aggressive

Related Entities
Central Networks East PLC

Issuer Credit Rating A/Stable/A-1

E.ON AG

Issuer Credit Rating A/Stable/A-1
 Commercial Paper A-1
 Senior Unsecured (50 Issues) A
 Short-Term Debt (1 Issue) A-1

E.ON Energy Ltd.

Issuer Credit Rating A/Stable/A-1

E.ON International Finance B.V.

Commercial Paper
Local Currency A-1

E.ON U.K. PLC

Issuer Credit Rating A/Stable/A-1
 Senior Unsecured (1 Issue) A

Kentucky Utilities Co.

Issuer Credit Rating BBB+/Stable/A-2
 Senior Unsecured (3 Issues) BBB+
 Senior Unsecured (4 Issues) BBB+/A-2

Louisville Gas & Electric Co.

Issuer Credit Rating BBB+/Stable/NR
 Senior Unsecured (8 Issues) BBB+
 Senior Unsecured (4 Issues) BBB+/A-2

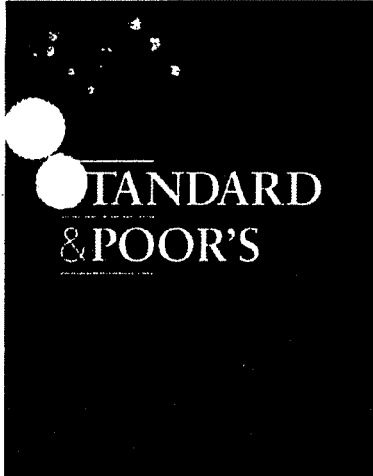
Powergen (East Midlands) Investments

Issuer Credit Rating A/Stable/--

*Unless otherwise noted, all ratings in this report are global scale ratings. Standard & Poor's credit ratings on the global scale are comparable across countries. Standard & Poor's credit ratings on a national scale are relative to obligors or obligations within that specific country.

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**Attachment to KPSC Question No. 14 – Standard & Pours, *Global Credit Portal* (LG&E)
dated May 6, 2010
Witness: Arbough**



Global Credit Portal RatingsDirect®

May 6, 2010

Louisville Gas & Electric Co.

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Major Rating Factors

Rationale

Outlook

Related Criteria And Research

Louisville Gas & Electric Co.

Major Rating Factors

Strengths:

- Stable and relatively predictable utility operations and associated cash flows;
- Credit supportive regulatory environment in Kentucky;
- Competitive rates; and
- Efficient operations and high customer satisfaction ratings.

Corporate Credit Rating

BBB+/Stable/NR

Weaknesses:

- Little fuel diversity, virtually all coal-fired;
- Heavy construction program;
- Rate relief needs during a time of unusual economic weakness; and
- Somewhat subpar consolidated financial metrics.

Rationale

The ratings on Louisville Gas & Electric Co. (LG&E) are based primarily on parent E.ON U.S. LLC's credit profile. The ratings on E.ON U.S. are based primarily on the credit profile of its two operating utilities in Kentucky--LG&E and Kentucky Utilities Co. (BBB+/Stable/A-2)--and the company's focus on operating the fully integrated utilities. Current ratings are linked to ultimate parent E.ON AG (A/Stable/A-1).

On April 28, 2010, PPL Corp. announced its plan to acquire E.ON U.S. for \$7.625 billion in cash. The transaction includes the assumption of \$574 million of tax-exempt debt at LGE and \$351 million of tax-exempt debt at KU. The acquisition requires approvals by state regulators in Kentucky, Virginia and Tennessee, and by the FERC. The transaction is expected to close by the end of 2010.

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rankings, and effective cost containment. The company's electric operations benefit from a fuel and purchased power (energy only) adjustment clause, an environmental cost recovery surcharge, and other timely cost recovery mechanisms, while its smaller gas operations benefit from a gas supply clause. These strengths are tempered by the lack of fuel diversity (nearly all coal-fired), a relatively heavy construction program, and rate relief needs during a period of unusual economic weakness. Construction outlays focus on the company's 75% ownership share in the 750 MW Trimble County Unit 2 coal-fired facility that's slated for completion later this year, ongoing environmental requirements, and other project betterments.

On July 16, 2009, the power plant lease arrangement between E.ON U.S.'s subsidiary Western Kentucky Energy Corp. and Big Rivers Electric Corp. was terminated. While unwinding of the contract required a large one-time cash payment of \$575 million and other concessions, it significantly reduces E.ON U.S.'s dependence on riskier unregulated activities, and enhances the company's business risk profile within the "excellent" category.

Currently pending before the Kentucky Public Service Commission are rate applications for a \$94.6 million (12.1%) electric rate hike and a \$22.6 million (7.7%) natural gas rate increase for LG&E and a \$135 million (11.5%) electric rate hike for KU. The rate requests are predicated upon an 11.5% return on equity. Commission orders are expected this summer. Higher rates are needed to recover the utilities' investment in Trimble County Unit 2, damage costs related to severe storms, and higher costs. The fact that the state regulators will be reviewing somewhat large rate hike requests in a weakened economy is a credit concern. Therefore, the company's ability to manage regulatory risk will be critical to credit quality.

E.ON U.S.'s consolidated financial metrics have declined somewhat, owing primarily to its heavy construction program. However, with well controlled operating and maintenance expenses, continued efficient operations, responsive regulatory treatment, and credit supportive actions by management, bondholder protection parameters should strengthen to levels more commensurate with the current rating level.

Short-term credit factors

Standard & Poor's expects E.ON U.S.'s capital spending to exceed cash flow from operations primarily because of significant environmental expenditures and outlays to complete the Trimble County Unit 2 station. The steady internal cash flow generated by KU's and LG&E's regulated operations will not be enough to meet these obligations, thus creating a reliance on outside capital. Such funding is expected to be concentrated at Germany-based parent E.ON AG, which will also provide support in the case of short-term liquidity needs. (An E.ON AG-related entity provides a credit facility to E.ON U.S. to ensure funding availability for its money pool.

Outlook

The stable outlook on LG&E mirrors that of parent E.ON U.S. is based on corporate strategy that maintains a primarily low-risk, utility-based business risk profile. Standard & Poor's could lower the ratings absent future sufficient rate relief, if construction expenditures materially increase resulting in higher-than-expected reliance on debt, and if cash flow metrics erode. In light of a prospectively heavy capital program and subpar financial metrics, higher ratings are not envisioned in the foreseeable future.

Related Criteria And Research

- "2008 Corporate Criteria: Analytical Methodology," April 15, 2008.
- "Criteria Methodology: Business Risk/Financial Risk Matrix Expanded," May 27, 2009.

Table 1.

Louisville Gas & Electric Co. -- Financial Summary*					
Industry Sector: Combo					
--Fiscal year ended Dec. 31--					
	2009	2008	2007	2006	2005
Rating history	BBB+/Stable/--	BBB+/Stable/--	BBB+/Stable/--	BBB+/Stable/--	BBB+/Stable/--
(Mil. \$)					
Revenues	1,272.0	1,467.0	1,286.0	1,338.0	1,424.3
Net income from continuing operations	95.0	90.0	120.0	117.0	128.9
Funds from operations (FFO)	194.7	191.5	232.9	234.4	271.8
Capital expenditures	186.3	255.2	203.0	146.0	138.9
Cash and short-term investments	5.0	4.0	4.0	7.0	7.1
Debt	1,307.8	1,442.0	1,204.4	1,067.6	1,172.0
Preferred stock	0	0	0	70.0	70.4
Equity	1,253.0	1,234.0	1,161.0	1,164.0	1,043.0
Debt and equity	2,560.8	2,676.0	2,365.4	2,231.6	2,215.0
Adjusted ratios					
EBIT interest coverage (x)	3.8	3.1	4.3	5.0	5.8
FFO int. cov. (x)	4.0	3.7	4.9	5.7	7.3
FFO/debt (%)	14.9	13.3	19.3	22.0	23.2
Discretionary cash flow/debt (%)	3.8	(8.9)	(7.4)	8.5	(2.3)
Net Cash Flow / Capex (%)	61.6	59.4	82.7	92.7	165.5
Debt/debt and equity (%)	51.1	53.9	50.9	47.8	52.9
Return on common equity (%)	7.6	7.5	10.6	10.7	12.7
Common dividend payout ratio (un-adj.) (%)	84.2	44.4	54.2	84.1	31.0

*Fully adjusted (including postretirement obligations).

Table 2.

Reconciliation Of Louisville Gas & Electric Co. Reported Amounts With Standard & Poor's Adjusted Amounts (Mil. \$)*								
--Fiscal year ended Dec. 31, 2009--								
Louisville Gas & Electric Co. reported amounts								
	Debt	Operating income (before D&A)	Operating income (before D&A)	Operating income (after D&A)	Interest expense	Cash flow from operations	Cash flow from operations	Capital expenditures
Reported	1,066.0	303.0	303.0	167.0	44.0	309.0	309.0	186.0
Standard & Poor's adjustments								
Operating leases	19.4	7.0	0.9	0.9	0.9	6.1	6.1	0.3
Postretirement benefit obligations	130.7	28.0	28.0	28.0	8.0	2.0	2.0	--

Table 2.

Reconciliation Of Louisville Gas & Electric Co. Reported Amounts With Standard & Poor's Adjusted Amounts (Mil. \$)* (cont.)								
Power purchase agreements	71.6	2.9	2.9	2.9	2.9	--	--	--
Asset retirement obligations	20.2	2.0	2.0	2.0	2.0	(1.3)	(1.3)	--
Reclassification of nonoperating income (expenses)	--	--	--	19.0	--	--	--	--
Reclassification of working-capital cash flow changes	--	--	--	--	--	--	(121.0)	--
Total adjustments	241.8	39.9	33.8	52.8	13.8	6.7	(114.3)	0.3

Standard & Poor's adjusted amounts

	Debt	Operating income (before D&A)	EBITDA	EBIT	Interest expense	Cash flow from operations	Funds from operations	Capital expenditures
Adjusted	1,307.8	342.9	336.8	219.8	57.8	315.7	194.7	186.3

*Louisville Gas & Electric Co. reported amounts shown are taken from the company's financial statements but might include adjustments made by data providers or reclassifications made by Standard & Poor's analysts. Please note that two reported amounts (operating income before D&A and cash flow from operations) are used to derive more than one Standard & Poor's-adjusted amount (operating income before D&A and EBITDA, and cash flow from operations and funds from operations, respectively). Consequently, the first section in some tables may feature duplicate descriptions and amounts.

Ratings Detail (As Of May 6, 2010)*

Louisville Gas & Electric Co.

Corporate Credit Rating	BBB+/Stable/NR
Senior Unsecured (8 Issues)	BBB+
Senior Unsecured (4 Issues)	BBB+/A-2

Corporate Credit Ratings History

07-Jul-2004	BBB+/Stable/NR
04-Aug-2003	BBB+/Stable/A-2
12-Sep-2002	A-/Stable/A-2

Business Risk Profile

Excellent

Financial Risk Profile

Aggressive

Related Entities

Central Networks East PLC

Issuer Credit Rating	A/Stable/A-1
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E.ON AG

Issuer Credit Rating	A/Stable/A-1
Commercial Paper	A-1
Senior Unsecured (50 Issues)	A
Short-Term Debt (1 Issue)	A-1

E.ON Energy Ltd.

Issuer Credit Rating	A/Stable/A-1
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E.ON International Finance B.V.

Commercial Paper	
Local Currency	A-1

Ratings Detail (As Of May 6, 2010)*(cont.)

E.ON U.K. PLC

Issuer Credit Rating A/Stable/A-1
Senior Unsecured (1 Issue) A

E.ON U.S. LLC

Issuer Credit Rating BBB+/Stable/--

Kentucky Utilities Co.

Issuer Credit Rating BBB+/Stable/A-2
Senior Unsecured (3 Issues) BBB+
Senior Unsecured (4 Issues) BBB+/A-2

Powergen (East Midlands) Investments

Issuer Credit Rating A/Stable/--

*Unless otherwise noted, all ratings in this report are global scale ratings. Standard & Poor's credit ratings on the global scale are comparable across countries. Standard & Poor's credit ratings on a national scale are relative to obligors or obligations within that specific country.

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The McGraw-Hill Companies

LOUISVILLE GAS AND ELECTRIC COMPANY

Response to Commission Staff's First Information Request Dated July 12, 2011

Case No. 2011-00162

Question No. 15

Witness: Daniel K. Arbough

Q-15. Provide a copy of any bond rating agency and or bank reports which discuss any issues surrounding obtaining regulatory approval for construction projects based upon EPA rules that have not been finalized.

A-15. The Company is not aware of any reports that are responsive to this request.

LOUISVILLE GAS AND ELECTRIC COMPANY

Response to Commission Staff's First Information Request Dated July 12, 2011

Case No. 2011-00162

Question No. 16

Witness: Lonnie E. Bellar

- Q-16. Explain whether LG&E is aware of any other electric generation utility that has filed a CPCN application with its state regulatory agency prior to EPA's new rules being finalized.
- A-16. LG&E is not aware of the position other electric generation utilities have taken with respect to CPCN applications for compliance with the EPA's new rules.

LOUISVILLE GAS AND ELECTRIC COMPANY

Response to Commission Staff's First Information Request Dated July 12, 2011

Case No. 2011-00162

Question No. 17

Witness: Lonnie E. Bellar

- Q-17. Refer to the Direct Testimony of Lonnie E. Bellar ("Bellar Testimony") at pages 9-10. In the final order in LG&E's most recent base rate case, at pages 28-33, there is discussion of testimony which supported return on equity ("ROE") estimates over a wide range for LG&E. The Commission found that LG&E's "required ROE for both electric and gas operations falls within a range of 9.75 to 10.75 percent with a midpoint of 10.25 percent." Pursuant to KRS 278.183(2)(b), the Commission must establish a reasonable return on capital expenditures for projects included in an environmental compliance plan.
- a. Notwithstanding that the parties to Case No. 2009-00549, with the exception of the Attorney General, signed a settlement agreeing to an ROE of 10.63 percent, explain why a 10.63 percent ROE is appropriate on a going forward basis.
 - b. Provide all economic analyses performed by or for LG&E that demonstrate a ROE of 10.63 percent is reasonable based on current economic conditions.
 - c. If it is appropriate for the Commission to consider the 10.63 percent ROE established in LG&E's last rate case, and in the absence of any new testimony addressing the derivation of ROE estimates, explain why it would not be appropriate to consider the return on equity testimony also.
 - d. Provide all support for the position that the Commission's decision in LG&E's last rate case to accept a 10.63 percent ROE for environmental cost recovery obligates the Commission to now adopt that same ROE for a new environmental compliance plan absent a showing that a 10.63 percent ROE is now reasonable.
- A-17. a. The 10.63 percent ROE, as agreed to by the eight signatories to the Stipulation in Case No. 2009-00549, is appropriate and reasonable on a going-forward basis. First, the 10.63 percent not only falls within the ROE for electric operations set forth in the Stipulation (10.25% to 10.75%), but likewise falls within the range set forth in the Commission's Order of July 30, 2010 (9.75% to 10.75%). Second, while the Commission issued independent findings that varied from certain terms in the Stipulation, the Commission approved the provisions in the Stipulation containing the 10.63% ROE for ECR purposes "in their entirety." Moreover, KU currently has a pending rate case in Virginia (PUE-2011-00013) in which it has requested a ROE of 11.0 percent, the midpoint of 10.5% and 11.5%. The requested ROE in that

proceeding is reflective of the current economic conditions and provides further evidence that the 10.63 percent ROE remains reasonable.

- b. Please see the attached direct testimony of Mr. William E Avera, dated April 1, 2011, referenced in response to KPSC Question No. 17(a) on CD in the folder titled Question 17b.
- c. The Commission can consider the ROE testimony from the record in Case No. 2009-00549. Please note that the agreed upon 10.63 percent value remains within the range (9.75% to 10.75%) set forth in the Commission's final Order in that proceeding.
- d. The 10.63 percent ROE for environmental cost recovery was first approved by the Commission in its February 5, 2009 Order in Case No. 2008-00252, which was a base rate case. The Commission's Order stated that "[t]ypically, an electric utility with an environmental surcharge approved pursuant to KRS 278.183 uses the ROE from its most recent rate case in the return component of the environmental costs included in its surcharge." The Commission then stated that the 10.63 percent ROE had been agreed to by the parties and approved its use. In LG&E's last base rate case, the signatories to the Stipulation agreed to continue use of the 10.63 percent ROE, despite agreeing upon a separate ROE for electric operations. Similarly, the Commission permitted KU to continue use of the 10.63 ROE for environmental cost recovery, but approved a separate ROE for electric operations. The Stipulation contained the resolution of various other items which at the time represented a balanced resolution of the issues under consideration in that case. In keeping with the Commission's precedent, it is reasonable to allow LG&E to utilize the specific ROE for environmental costs approved in LG&E's last rate case, which is the 10.63 percent requested in this proceeding.

LOUISVILLE GAS AND ELECTRIC COMPANY

Response to Commission Staff's First Information Request Dated July 12, 2011

Case No. 2011-00162

Question No. 18

Witness: John N. Voyles, Jr. / Charles R. Schram

Q-18. Refer to Schram Testimony at pages 3-4. The testimony references two related analyses which were performed by LG&E's Project Engineering department, along with Black & Veatch.

- a. Provide the reports and all supporting workpapers for the suite of environmental compliance facilities for each coal unit in the generation fleet to determine whether all of the proposed facilities would be necessary to meet the applicable environmental regulations.
- b. Provide the reports and all supporting workpapers for the determination for each generating unit if it would be more cost effective to install the facilities or to retire the unit and buy replacement power or generation.
- c. If not included in parts a. and b. above, explain how the analyses considered the purchase of power (renewable or otherwise) and provide the workpapers and assumptions for each specific power purchase scenario.
- d. As the costs of environmental compliance are realized, the relative price of smaller decentralized power generation becomes more attractive. Other utilities and companies in Kentucky are exploring the development of potential sources of generation including landfill methane, bio-digesters, biomass, and small natural gas wellheads. Explain whether the analyses considered the development of these or other potential distributed generation sources and provide the workpapers and assumptions for each scenario.
- e. As the costs of environmental compliance are realized, the relative price of Demand Side Management and energy efficiency programs becomes more attractive. If not included in parts a. and b. above, explain whether and how the development of new and the expansion of existing programs is considered in the analyses.

A-18. a. The report and documentation is included in Exhibit JNV-2.

- b. Exhibit CRS-1 contains the material supporting the determination for building controls or retiring the unit and constructing replacement generation.

- c. The analyses do not consider power purchases, renewable or otherwise. Ultimately, market availability of suitable replacement capacity and energy is determined through the RFP process when replacing generation.
- d. The Companies' 2011 Integrated Resource Plan evaluated multiple technologies, including renewable technologies, in the supply side screening process. The Companies have not seen information which supports the cost-effectiveness of decentralized power generation at the scale required to replace the generation assumed to be retired in the 2011 Compliance filing. Replacement generation for the units recommended for retirement will need to be dispatchable to meet the customers' energy needs and be of sufficient scale to replace the retired units' capacity. The RFP for new capacity and energy issued in December 2010 resulted in multiple responses from parties marketing renewable generation resources. The Companies have, and continue to, explore these options as well.
- e. The analyses include the impact of programs in the 2011 DSM filing, but do not consider further energy efficiency programs. The need for replacement generation due to retirements of units assumed in the 2011 Compliance plan is unlike any plan to use incrementally increasing energy efficiency programs to meet incremental growth in load requirements. The scale of the retirements and their timing, all by the end of 2015, create an immediate need for capacity and energy at that time.

LOUISVILLE GAS AND ELECTRIC COMPANY

Response to Commission Staff's First Information Request Dated July 12, 2011

Case No. 2011-00162

Question No. 19

Witness: Charles R. Schram

- Q-19. Refer to Schram Testimony, Exhibit CRS-1, Section 6.0, Appendix A – Analysis Assumptions, at page 48. Explain the derivation of the Desired Return on Rate Base of 6.71 percent.
- A-19. The Desired Return on Rate Base is the weighted average of the Companies' return on equity and after-tax cost of debt. The attachment to this response shows the derivation. Because the majority of the costs evaluated in the decisions to install controls or retire/replace capacity are non-ECR costs, the Companies utilized a weighted average cost of capital for non-ECR projects in its analysis. A summary of the Companies' weighted average cost of capital for ECR projects is also included.

2010 Year-End, WACC

	<u>LGE</u>	<u>KU</u>	<u>Combined Companies- 50/50 Weighting</u>	<u>Combined Companies- Wtd Avg</u>
<u>Non-ECR Projects (10.5% ROE)</u>				
Financing Contribution	45.54%	47.13%	46.52%	46.52%
Common Stock Contribution	54.46%	52.87%	53.48%	53.48%
Permanent Financing Cost of Debt	3.97%	3.76%	3.87%	3.84%
Equity Return	10.50%	10.50%	10.50%	10.50%
Tax Rate	38.9%	38.9%	38.9%	38.9%
WACC	6.82%	6.63%	6.72%	6.71%
<u>ECR Projects (10.63% ROE)</u>				
Financing Contribution	45.54%	47.13%	46.52%	46.52%
Common Stock Contribution	54.46%	52.87%	53.48%	53.48%
Permanent Financing Cost of Debt	3.97%	3.76%	3.87%	3.84%
Equity Return	10.63%	10.63%	10.63%	10.63%
Tax Rate	38.90%	38.90%	38.90%	38.90%
WACC	6.89%	6.70%	6.78%	6.78%

2010

	Unadjusted Capitilization	Weighting	Cost Rate	Gross Up		CER Input	
LGE							
Short-Term Debt	174,876	7.13%	2.133%	0.15%	0.15%	Debt Rate	Debt %
A/R Securitization	0	0.00%	0.000%	0.00%	0.00%	3.97%	45.54%
Long-Term Debt	942,156	38.41%	4.313%	1.66%	1.66%		
Preferred Stock	0	0.00%	0.000%	0.00%	0.00%		
Common Equity	1,335,909	54.45%	10.500%	5.72%	9.36%		
Totals	2,452,941	99.99%					

				Gross Up		CER Input	
KU							
Short-Term Debt	10,434	0.27%	0.250%	0.00%	0.00%	Debt Rate	Debt %
A/R Securitization	0	0.00%	0.000%	0.00%	0.00%	3.76%	47.13%
Long-Term Debt	1,839,956	46.87%	3.779%	1.77%	1.77%		
Preferred Stock	0	0.00%	0.000%	0.00%	0.00%		
Common Equity	2,075,467	52.87%	10.500%	5.55%	9.08%		
Totals	3,925,857	100.00%					

				Gross Up		CER Input	
50/50 Combined Company Weighting							
Short-Term Debt	92,655	2.91%	1.192%	0.03%	0.03%	Debt Rate	Debt %
A/R Securitization	0	0.00%	0.000%	0.00%	0.00%	3.87%	46.52%
Long-Term Debt	1,391,056	43.61%	4.046%	1.76%	1.76%		
Preferred Stock	0	0.00%	0.000%	0.00%	0.00%		
Common Equity	1,705,688	53.48%	10.500%	5.62%	9.20%		
Totals	3,189,399	100.00%					

				Gross Up		CER Input	
Combined Company Weighting							
Short-Term Debt	185,310	2.91%	2.027%	0.06%	0.06%	Debt Rate	Debt %
A/R Securitization	0	0.00%	0.000%	0.00%	0.00%	3.84%	46.52%
Long-Term Debt	2,782,112	43.61%	3.960%	1.73%	1.73%		
Preferred Stock	0	0.00%	0.000%	0.00%	0.00%		
Common Equity	3,411,376	53.48%	10.500%	5.62%	9.20%		
Totals	6,378,798	100.00%					

Tax Rate 38.9000%

Other financial notes:

- The property tax rate of 0.15% is based on the rate for manufacturing equipment as shown in KRS 132.020(1).
- The insurance rate of 0.07% is used as an estimate for the composite insurance rate for generation assets as an input to the Strategist CER module.

LOUISVILLE GAS AND ELECTRIC COMPANY

Response to Commission Staff's First Information Request Dated July 12, 2011

Case No. 2011-00162

Question No. 20

Witness: Gary H. Revlett

- Q-20. Refer to Bellar Testimony at page 5, lines 16-18. Explain why LG&E has not installed the SAM mitigation systems for Mill Creek Units 3 and 4 that were approved in LG&E's 2006 Plan. When does LG&E expect to install the systems?
- A-20. The referenced SAM mitigation systems in LG&E's 2006 Environmental Compliance Plan were originally planned to mitigate modeled visibility impairment issues for Mill Creek Units 3 and 4 in accordance with the Regional Haze Rule, including requirements to install the Best Available Retrofit Technology (BART). Kentucky submitted a revised State Implementation Plan (SIP) on June 25, 2008 that specified installation of the equipment at Mill Creek (with an additional revision on May 28, 2010 to correct emission limit values); however, EPA has not yet approved the Kentucky SIP. This delay has been due to EPA's previous determination that compliance with CAIR would fulfill BART requirements and uncertainty created by the subsequent remand of CAIR and its replacement by Clean Air Transport Rule (CATR)/Cross State Air Pollution Rule (CSAPR). Implementation of the SAM mitigation systems under the SIP will not be required until after the SIP is approved. Because EPA has replaced CAIR with CSAPR, Kentucky will need to resubmit its State Implementation Plan and again await approval by EPA. However, the Company has applied to the Louisville Metro Air Pollution Control District (LMAPCD) for a construction permit for installation of the required for environmental controls and currently anticipates issuance of a permit in early 2012.

LOUISVILLE GAS AND ELECTRIC COMPANY

Response to Commission Staff's First Information Request Dated July 12, 2011

Case No. 2011-00162

Question No. 21

Witness: John N. Voyles, Jr.

- Q-21. Refer to the Direct Testimony of John N. Voyles ("Voyles Testimony") at page 12, lines 3-10. Fully explain the decision to locate the new FGD for Mill Creek Units 1 and 2 such that it requires demolition of existing warehouses and locker rooms, given that these facilities will be reconstructed in a different location at the site.
- A-21. Several optional layouts of the WFGD for Mill Creek Units 1 and 2 were considered, including refurbishing the existing WFGDs. However, the other potential layouts would require longer unit outages, increased overall costs due to construction in more constrained spaces which would restrict modular construction, present more difficult constructability issues (crane placement, interference with station operations during construction) and safety considerations (see Black and Veatch reports). The current option was adopted as the best overall location to reduce the total cost of the project. The location chosen provides a construction zone away from the operation of the units which will minimize impact to the operating units and result in a lower overall construction cost by decreasing interference from the station operations to the constructor, as well as allow modular construction instead of smaller component erection for constrained construction close to the units.

LOUISVILLE GAS AND ELECTRIC COMPANY

Response to Commission Staff's First Information Request Dated July 12, 2011

Case No. 2011-00162

Question No. 22

Witness: John N. Voyles, Jr.

- Q-22. Refer to Voyles Testimony at page 5 which states that Black and Veatch was retained in May 2010 to assist the LG&E in developing their Environmental Compliance Plan.
- a. Was a Request for Proposal ("RFP") issued to obtain these services? If so provide a copy.
 - b. What other companies were considered to perform the services for which Black & Veatch was retained?
 - c. Provide a copy of the contract with Black & Veatch.
 - d. Provide the amount that has been paid to Black & Veatch as of the most recent payment.
 - e. Will the expenditures associated with the Black and Veatch contracts be included in the ECR?
 - f. Have the expenditures that have been incurred to date been assigned to Projects 26 and/or 27?
 - g. If so, provide the amounts currently charged to each of the projects.
- A-22. a. There are a number of engineering service providers that the companies have used previously that are qualified to perform these types of assessments. The first study was requested to support the company's financial planning process. Due to the limited time available, a formal RFP was not issued, however, the Project Engineering management team contacted two of the most experienced, top engineering firms, Black and Veatch and Burns and McDonnell to determine their interest in the project, their availability to execute the project with the best qualified engineers within the proposed timeframe and their expectations of the total cost. Black and Veatch proposed the most viable plan.
- b. See the response to part a.

- c. Please see the attached contract. Certain redacted information is being filed with the Commission under seal pursuant to a Petition for Confidential Protection.
- d. Black and Veatch have invoiced \$1,396,674.64 (\$579,205.25 LGE/\$817,469.39 KU) to date.
- e. Yes, the expenditures associated with the Black and Veatch work will be included.
- f. No, Black and Veatch expenses have been assigned to Projects 26 and/or 27.
- g. Please see the response to part f.

**Attachment to KPSC Question No. 22(c) – Contract No. 43658 – Black & Veatch Corporation
Air Quality Control Study
Witness: Voyles**

CONTRACT NO. 43658

**BLACK & VEATCH CORPORATION
AIR QUALITY CONTROL STUDY
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SIGNATURES REQUIRED ON THE FOLLOWING PAGES NOTED BELOW:

Contract Signature (Return two originals) ----- 5
Safety Policy Signature (Return one with original signature) ----- 27

E.ON U.S. Services Inc. Company
C O N T R A C T No. 43658

AIR QUALITY CONTROL STUDY

FOR:

E.W. BROWN UNITS 1, 2, AND 3
GHEENT UNITS 1, 2, 3, AND 4
CANE RUN UNITS 4, 5, AND 6
MILL CREEK UNITS 1, 2, 3, AND 4
TRIMBLE COUNTY UNITS 1 AND 2
GREEN RIVER UNITS 3 AND 4

This Contract is entered into, effective as of April 28, 2010, between E.ON U.S. Services Inc. (hereinafter referred to as "E.ON U.S. or Company"), whose address is 820 Broadway, Louisville, KY 40202, and Black & Veatch Corporation (hereinafter referred to as "Contractor") whose address is 11401 Lamar Avenue, Overland Park, KS 66211. The parties hereto agree as follows:

1.0 GENERAL

Contractor shall perform the following: Air Quality Control Study to include: E.W Brown Units 1, 2, and 3; Ghent Units 1, 2, 3, and 4; Cane Run Units 4, 5, and 6; Mill Creek Units 1, 2, 3, and 4; Trimble County Units 1 and 2; and Green River Units 3 and 4, as more specifically described in Articles 2.0 and 3.0 hereof (hereinafter referred to as the "Work") and E.ON U.S. shall compensate the Contractor on a time and material basis NOT TO EXCEED ONE HUNDRED THIRTY FIVE THOUSAND DOLLARS for the Work, under all the terms and conditions hereof.

2.0 DESCRIPTION OF WORK

- 2.1 Except as otherwise expressly provided herein, Contractor shall supply all labor, supervision, materials, equipment, tools and warehousing, and shall pay all expenses, necessary or appropriate in the performance of the Work.
- 2.2 No materials containing asbestos shall be supplied or used in the performance of Work.
- 2.3 Without limitation, Contractor shall meet all requirements set forth in the Lead Construction Standard 29 CFR 1926.62.
- 2.4 The Work shall include but not be limited to the following:
 - 2.4.1 Air Quality Control Study for E.ON U.S. Fleet (see Exhibit No. 1)

3.0 EXHIBITS AND SCOPE OF WORK

All work shall be performed in strict accordance with the following exhibits and Scope of Work which are incorporated herein by reference.

3.1 EXHIBITS

<u>EXHIBIT No.</u>	<u>TITLE</u>
Exhibit No. 1	Scope of Work
Exhibit No. 2	General Services Agreement, "The Standard Terms", Executed 5 November 2009.

EXHIBIT NO.	TITLE
Exhibit No. 2 (i)	E.ON U.S. Contractor/Subcontractor Safety Policy (incorporated herein by reference)
Exhibit No. 2(ii)	Drug Testing Requirements (incorporated herein by reference)
Exhibit No. 2(iii)	E.ON U.S. Contractor Code of Conduct (incorporated herein by reference)
Exhibit No. 3	Project Cost / Manpower Summary
Exhibit No. 4	Bidder Comment Log
Exhibit No. 5	Passport Overview (incorporated herein by reference)
Exhibit No. 6	Project Specific Hazard Analysis
Exhibit No. 7	Hazard Mitigation Plan

4.0 TERM

This Contract shall become effective upon full execution and continue through completion of Work, subject to the Article titled "Termination at E.ON U.S.'s Option" set forth in the attached Standard Terms. E.ON U.S. makes no promise or guarantee as to the amount of Work to be performed under this Contract.

5.0 PERFORMANCE SCHEDULE

5.1 Contractor shall commence performance of the Work on execution of this Contract and shall complete Work not later than the dates listed below.

Kick- Off meeting:	Week of May 3, 2010
Visits to plant sites:	Week of May 24, 2010
First Draft Report due:	June 1, 2010
Comments from E.ON	
Returned to Contractor	June 11 2010
Second Draft Report	June 18, 2010
Final Report due:	July 2, 2010

5.2 Contractor shall notify E.ON U.S. of all subcontractors to be utilized in performance of Work at least forty-eight (48) hours prior to start of Work. Subcontractors will be denied access to E.ON U.S. facilities without the required notification. See the Article titled "Subcontracts and Purchase Orders" in the Standard Terms.

5.3 Company may terminate this Contract "for cause" should Contractor not maintain the performance schedules set-forth herein, Because time is of the essence, Contractor shall not be given an opportunity to cure its performance.

6.0 STANDARD TERMS AND CONDITIONS

E.ON U.S. Services Inc.'s General Services Agreement (the Standard Terms) executed by your company on November 5, 2009 (Exhibit No. 1) as part of E.ON U.S./E.ON U.S.'s Supplier Certification process, or the most current fully executed General Services Agreement, and the Contractor Code of Business Conduct and Contractor Safety Policies are hereby incorporated by reference herein and are thereby made a part of this Contract.

7.0 CONTRACTOR DRUG AND ALCOHOL TESTING

7.1 **Plant Outage, Plant Project, or Major Construction Work:** The work under this Contract is considered "Plant Project Work". In accordance with the revised E.ON-US Contractor /

Subcontractor Safety Policy effective 1-31-08, all contractor employees working on-site shall fully comply with the terms and conditions of the executed General Services Agreement to include compliance with Company's Drug, Alcohol, and Safety Policies. E.ON-US Corporate Health and Safety will be auditing Contractor compliance with these requirements. Any cost associated with compliance shall be the responsibility of the Contractor.

8.0 SPECIFIC REPORTING REQUIREMENTS

Contractor shall promptly submit the schedules and reports set forth below:

- 8.1 Weekly progress Reports and action items list.
- 8.2 First Draft Project Report due June 1, 2010
- 8.3 Second Draft Report due June 18, 2010 assuming EON response to draft issued by June 11, 2010.
- 8.4 Final Report Due July 2, 2010

9.0 COMPENSATION

9.1 Time and Materials Not To Exceed

Full compensation to Contractor for full and complete performance of the Work, compliance with all terms and conditions of this Contract and payment by Contractor of all obligations incurred in, or applicable to, Contractor's performance of the Work (hereinafter referred to as the "Contract Price") shall be in accordance with Schedule A, attached hereto and made a part of this Contract, with a NOT TO EXCEED PRICE OF ONE HUNDRED THIRTY FIVE THOUSAND DOLLARS (\$135,000), inclusive of travel, unless otherwise approved in writing by E.ON U.S.

9.1.1 For accounting purposes only, the time and materials price is broken down as follows:

		TOTAL
Task	Coal-Fired Fleet Wide Assessment	
1	Project Initiation	\$5,360.00
2	Project Kick-off Meeting and Site Visits	\$26,936.00
3	Review and Confirm Air Emission Levels	\$4,572.00
4.1	Project Design Memo	\$7,966.00
4.2	Technology Description & Selection	\$18,632.00
4.3	Cost Estimate (Capital, O&M, Layouts, etc.)	\$47,926.00
5	Report	\$23,608.00
	Man-hours	
	Billing Rate (\$/mh)	
	Labor Subtotal	\$135,000.00
<i>Note:</i>	<i>Travel costs are estimated at \$10,000 for 6 staff for 5 days</i>	

9.2 PRICING FOR CHANGES IN SCOPE OF WORK

At E.ON U.S.'s sole option, adjustments to the Contract Price for changes in the scope or description of Work shall be on a lump sum basis, unit price basis, or in accordance with Schedule A attached to and made a part of this Contract

9.3 SPECIAL INVOICING INSTRUCTIONS

9.3.1 See the Article titled "Invoices and Effect of Payments" in the Standard Terms.

9.3.2 Invoices shall be prepared in one original and one copy distributed as follows:

Original: E.ON U.S. Services Inc.
820 West Broadway
Louisville, KY 40202
Attn: Judy Disney

Copy: E.ON U.S. Services Inc.
820 West Broadway
Louisville, KY 40202
Attn: Eileen Saunders

Invoice	CPA Number	43658
Information	Project #	TBA
	Task #	TBA
	E.ON U.S. Contact	Eileen Saunders
	Contractor Contact	Kyle Lucas

10.0 CONTRACTUAL NOTICES

See the Article titled "Notices" in the Standard Terms for provisions governing contractual notices. In addition, a copy of all notices to E.ON U.S. Services Inc. shall be sent to:

10.1 E.ON U.S.'s address: E.ON U.S. Services Inc.
820 West Broadway
Louisville, KY 40202
Attn: Joe Clements
(502) 627-2760
Joe.clements@eon-us.com

10.2 Contractor's Address: MikeKing, P.E.
Regional General Manager
Black & Veatch
3550 Green Court
Ann Arbor, MI. 48105
Phone: (734) 622-8516
Fax: (734) 622-8700
e-mail: kingml@bv.com

11.0 ENTIRE AGREEMENT

This Contract, including all specifications, exhibits and drawings listed in this Contract and the Standard Terms, constitutes the entire agreement between the parties relating to the Work and

supersedes all prior or contemporaneous oral or written agreements, negotiations, understandings and statements pertaining to the Work or this Contract.

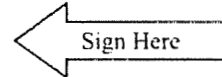
The parties hereto have executed this Contract on the dates written below, but it is effective as of the date first written above.

E.ON U.S. Services Inc.

BY: *Joe Clements*
NAME (Print): Joe CLEMENTS
TITLE: Mgr. CONTRACTS
DATE: 5/3/10

Black & Veatch Corporation

BY: *Kent D. Pollins*
NAME (Print): KENT D. POLLINS
TITLE: Sr Vice President
DATE: 30 Apr 10



-END-

**COMMERCIAL SCHEDULE A
LABOR HOURLY RATES**

THE WORK SHALL BE PERFORMED AND BILLED AT A BLENDED BILL RATE OF [REDACTED]

1. The above rates may be used for agreed to Change Orders and Standby Time.
2. Except as may be expressly provided otherwise elsewhere in this Contract, the rates set forth above are inclusive of all direct wage rates, fringe benefits, labor allowances, payroll taxes, insurance, small tools which cost Contractor less than \$1,500 per tool, temporary construction facilities, consumables, expendables, overhead profit and all other costs and expenses incurred by Contractor in performing the Work and this Contract.
3. The rates will only apply to actual hours worked or standby time, as agreed and attested to by an E.ON U.S. Representative.
4. Individual travel time to and/or from respective job sites are not billable hours.
5. Individual travel, per-diem, and related travel expenses are to be billed at cost.

LOUISVILLE GAS AND ELECTRIC COMPANY

Response to Commission Staff's First Information Request Dated July 12, 2011

Case No. 2011-00162

Question No. 23

Witness: Shannon L. Charnas

- Q-23. Refer to Charnas Testimony at page 4, lines 11-15 which indicates the accounts that LG&E proposes to use to identify and track O&M costs for the Compliance Plan projects.
- a. Are other expenses charged to these accounts that are not related to the Compliance Plan projects?
 - b. If so, how will LG&E ensure that only O&M expenses related to the Compliance Plan projects are recovered through the environmental surcharge?
- A-23. a. Yes, there are expenses that are not related to the Compliance Plan projects recorded to accounts 502, Steam Expenses – Operation; 506, Miscellaneous Steam Power Expenses; and 512, Maintenance of Boiler Plant.
- b. The expenses that are related to the Compliance Plan are recorded in subaccounts for ECR related activity and identified by location. These subaccounts contain only ECR related costs. See the testimony of Shannon L. Charnas at page 4, lines 11-15.

LOUISVILLE GAS AND ELECTRIC COMPANY

Response to Commission Staff's First Information Request Dated July 12, 2011

Case No. 2011-00162

Question No. 24

Witness: Robert M. Conroy

Q-24. Refer to the Direct Testimony of Robert M. Conroy ("Conroy Testimony") at page 5, lines 1-21. Provide an analysis of the \$8.85 million of annual O&M expense associated with the FGDs at Mill Creek that is included in base rates.

A-24. Please see the attached.

LG&E and KU Power Generation
 Mill Creek FGD/SDRS Expenses
 12 Months Ended Oct 2009

Account	Exp Type	MC1	MC2	MC3	MC4	Total
502006 - SCRUBBER REACTANT EX	0438 - PM - DIBASIC ACID	0	0	\$430,180	0	\$430,180
502006 - SCRUBBER REACTANT EX	0432 - PM - LIMESTONE	\$ 792,980	\$ 814,067	\$ 1,010,285	\$ 1,307,288	\$ 3,924,620
Total		\$ 792,980	\$ 814,067	\$ 1,440,466	\$ 1,307,288	\$ 4,354,801
512005 - MAINTENANCE-SDRS	PLTL: TOTAL LABOR	\$87,891	\$59,495	\$85,670	\$85,619	\$318,675
512005 - MAINTENANCE-SDRS	PNTL: TOTAL NON-LABOR	\$1,100,962	\$704,865	\$1,184,452	\$1,191,670	\$4,181,949
Total		\$1,188,852	\$764,360	\$1,270,122	\$1,277,289	\$4,500,623
Total O&M included in Base Rates		\$1,981,833	\$1,578,427	\$2,710,588	\$2,584,577	\$8,855,424

LOUISVILLE GAS AND ELECTRIC COMPANY

Response to Commission Staff's First Information Request Dated July 12, 2011

Case No. 2011-00162

Question No. 25

Witness: Robert M. Conroy

Q-25. Refer to Conroy Testimony at page 7, lines 3-6. Can LG&E's accounting system allow for the use of additional subaccounts to permit accumulation of SAM sorbent costs by the project for which it is consumed?

A-25. LG&E's accounting system does allow for the use of additional subaccounts to the SAM sorbent costs by the project for which it is consumed. As stated in testimony, from an operational perspective, it is very difficult to track separately SAM sorbent being used by multiple environmental facilities related to different ECR projects at the same generating unit with any reasonable certainty because multiple environmental facilities related to different ECR projects at the same generating unit will consume the same sorbent. It is not practical for the plants to maintain and track separate inventories of the same sorbent that has multiple uses.

In the alternative, LG&E would have to use an allocation to assign the sorbent costs to the appropriate approved project.

The purpose of LG&E's proposed method for sorbent cost recovery is for practical necessity and to provide the clearer reporting to the Commission.

LOUISVILLE GAS AND ELECTRIC COMPANY

Response to Commission Staff's First Information Request Dated July 12, 2011

Case No. 2011-00162

Question No. 26

Witness: Lonnie E. Bellar

- Q-26. Refer to Bellar testimony at page 11, lines 4-8. Mr. Bellar implies that an alternative revenue allocation should be considered. Is Mr. Bellar suggesting any alternative for consideration in this proceeding?
- A-26. The Company is not suggesting a specific alternative revenue allocation should be considered in this proceeding. The issue of revenue allocation is not a new topic and has been discussed extensively in previous ECR Plan cases. Given the amount of LG&E's proposed investment in ECR facilities compared to LG&E's current electric rate base, it would be reasonable to consider alternative revenue allocations that balance the interests of all customers.

LOUISVILLE GAS AND ELECTRIC COMPANY

Response to Commission Staff's First Information Request Dated July 12, 2011

Case No. 2011-00162

Question No. 27

Witness: John N. Voyles, Jr.

Q-27. Refer to Bellar Testimony at page 14, line 2. Mr. Bellar states that "contracting for certain parts of work" has commenced. List any contracts that LG&E has entered related to Projects 26 and 27. Include the date of the contract, a description of the services and/or equipment included and the dollar amount of the contract.

A-27. No contracts for Projects 26 and 27 have been entered into with regards to detailed engineering, procurement of equipment or materials, or construction. Contracts to date include only preliminary engineering assessments, scope development and specification development.

Contract: 43658
Date: April 28, 2010
Cost: Not to Exceed \$135,000

Scope: Black and Veatch contracted to perform Air Quality Control Studies for E.W. Brown, Ghent, Cane Run, Mill Creek, Trimble County and Green River stations. No equipment included in the contract.

Contract: 496789
Date: August 28, 2010
Cost: Not to Exceed \$1,593,000

Scope: Black and Veatch contracted to perform facility specific air quality control studies consisting of conceptual design and budgetary cost estimates for E.W. Brown, Ghent and Mill Creek Stations. No equipment purchases were included in the contract.

Contract: 510845
Date: June 9, 2011
Cost: Not to Exceed \$374,517

Scope: Black and Veatch contracted to prepare the technical specifications for the WFGDs, Fabric Filters (baghouses) and Fans. Additionally, Black and Veatch will support LGE/KU with the technical review of bids for the aforementioned equipment. No equipment purchases were included in the contract.

Contract: 501654
Date: December 13, 2010
Cost: Not to Exceed \$75,729

Scope: Babcock Power Environmental Inc. was contracted to provide all engineering, insurance, travel, and services to assess the feasibility of upgrading the existing Mill Creek Units 1 and 2 FGDs and upgrading the existing Mill Creek Unit 4 FGD and utilizing it for Mill Creek Unit 3. This report was provided to Black and Veatch and included in their report.

LOUISVILLE GAS AND ELECTRIC COMPANY

Response to Commission Staff's First Information Request Dated July 12, 2011

Case No. 2011-00162

Question No. 28

Witness: Lonnie E. Bellar / Counsel

- Q-28. Refer to Bellar Testimony at page 14, lines 20–22. Mr. Bellar states, "by filing now, LG&E has ensured that the CATR and HAPs Rule should be final before the Commission must issue its final order in this proceeding." In the event the HAPs rule is not final at the time the final order in this proceeding is due, what is LG&E's proposal to the Commission with regard to the approval of the certificates of convenience and necessity?
- A-28. The CATR rule (renamed by the EPA as the Cross-State Air Pollution Rule "CSAPR") has become final since LG&E filed its application. With regard to the HAPs rule, the EPA is required pursuant to court order to publish the final rule by November 16, 2011, well in advance of the date by which the Commission is required to issue a final order in this proceeding. If, unexpectedly, the rule is not final before the Commission must issue its final order in this proceeding, the Commission can still grant the certificates of convenience and necessity LG&E has requested. The Commission has, in many cases, recognized the importance of expedient action. In so doing, the Commission has successfully discharged its responsibility under KRS Chapter 278 by ruling upon cases before it without waiting on the resolution of all related issues. For example, in Case No. 2000-00112 the Commission granted a certificate of convenience to KU and LG&E for the construction of selective catalytic reduction technologies although the final emissions limit was pending before the U.S. Court of Appeals for the District of Columbia.¹ Because the impending implementation date was not stayed, KU and LG&E filed their application for certificates of convenience and necessity based upon the most stringent emissions limit within the Court's consideration. KU and LG&E explained that they would only construct the number of units necessary to comply with the ultimate emissions limit. This is very analogous to the present situation, as LG&E must seek certificates of convenience and necessity in this proceeding in order to comply with the implementation date although the final rules are not yet issued.

¹ *In the Matter of: Application of Kentucky Utilities Company and Louisville Gas and Electric Company for a Certificate of Convenience and Necessity to Construct Selective Catalytic Reduction (SCR) NOx Control Technologies*, PSC Case No. 2000-00112 (Order dated June 22, 2000).

Further, the Commission has routinely issued final orders conditioned upon the occurrence of future necessary events.² Likewise, the Commission has taken into account relevant time frames when they affect the bottom lines of utilities.³ As explained in LG&E's application, it is prudent to seek Commission approval before the rule becomes final in order to construct the proposed projects at a reasonable cost. Thus, even if the HAPs rule is not final by the date the Commission must issue its final order, the Commission may still grant the certificates of convenience and necessity.

² See, e.g., *Application of Bluegrass Wireless LLC for Issuance of a Certificate of Public Convenience and Necessity to Construct a Cell Site (Woodbine) in Rural Service Area #11 (Whitley) of the Commonwealth of Kentucky*, PSC Case No. 2008-00080 (Order dated Sept. 26, 2008) (issuing final order even though the applicant's applications with the Federal Aviation Administration and the Kentucky Airport Zoning Commission remained pending, and instructing the applicant to file copies of the final decisions of the FAA and KAZC within ten days of receiving them); *Joint Application of Classic Construction, Inc. and Coolbrook Utilities, LLC for Approval of the Transfer of Wastewater Treatment Plant to Coolbrook Utilities, LLC*, PSC Case No. 2008-00257 (Order dated Oct. 21, 2008) (approving the transfer of the utility upon the condition that the buyer obtain an irrevocable letter of credit and line of credit and the necessary permits for the operation of the utility, including a Kentucky Pollutant Discharge Elimination System Permit); *Joint Application for Transfer of Louisville Gas and Electric Company and Kentucky Utilities Company in Accordance with E.ON AG's Planned Acquisition of Powergen PLC*, PSC Case No. 2001-104 (Order dated Aug. 6, 2001) (approving the transfer upon numerous conditions, including the requirement that the necessary approvals of other federal and state agencies be filed with the Commission within ten days of receipt)

³ See, e.g., *Application of the North Hopkins Water District for a Certificate of Public Convenience and Necessity to Construct and Finance an Improvements Project Pursuant to KRS 278.300*, PSC Case No. 2001-243 (Order dated Aug. 30, 2001) (granting a deviation from numerous filing requirements of 807 KAR 5:001, to save the utility the time of compiling the financial information because the construction project had been bid and the loss of time would risk loss of favorable bids); *Application of Henry County Water District No. 2 to Issue Securities in the approximate Principal Amount of \$2,958,000 for the Purpose of Refunding Certain Outstanding Revenue Bonds of the District Pursuant to the Provisions of KRS 278.300 and 807 KAR 5:001*, PSC Case No. 2002-00411 (Order dated Dec. 16, 2002) (granting a deviation from filing requirements of 807 KAR 5:001 because the "volatility of the bond market" made it risky to delay the closing of the loan while the utility expended the time necessary to compile the necessary financial information).

LOUISVILLE GAS AND ELECTRIC COMPANY

Response to Commission Staff's First Information Request Dated July 12, 2011

Case No. 2011-00162

Question No. 29

Witness: John N. Voyles, Jr.

- Q-29. Refer to Voyles Testimony at page 24, lines 15-19. The testimony states that LG&E does not plan to enter into any contracts for equipment or construction until a final order is issued in this proceeding "unless entering into one or more such contracts would be necessary to ensure timely environmental compliance or to avoid significant market price or equipment availability risks".
- a. Has LG&E enter into any contracts for Projects 26 and/or 27 to date?
 - b. How will LG&E assess the market price or equipment availability risks associated with the related equipment or construction?
- A-29. a. Please see the response to Question No. 27.
- b. As the Companies have been actively engaged in environmental control equipment and major construction projects during the recent 10 years LG&E and KU maintain good relationships with engineering and construction firms that monitor market impacts to commodities, as well as labor and engineered equipment availability. Along with our own experience, these firms have been willing to discuss their market research with the company in the past which has been invaluable to our engineering, project management and construction efforts. Additionally, LG&E actively participates in industry conferences where market volatility, equipment availability and construction issues are discussed.

LOUISVILLE GAS AND ELECTRIC COMPANY

Response to Commission Staff's First Information Request Dated July 12, 2011

Case No. 2011-00162

Question No. 30

Witness: John N. Voyles, Jr.

- Q-30. Refer to Voyles Testimony at page 25. Has LG&E issued any Requests for Quotations ("RFQs") for the equipment related to these projects? If so, provide the issue date of the RFQ, the equipment for which quotations are sought, and the due date for responses.
- A-30. No Requests for Quotations for the equipment related to the projects have been issued as of the date of this filing.

LOUISVILLE GAS AND ELECTRIC COMPANY

Response to Commission Staff's First Information Request Dated July 12, 2011

Case No. 2011-00162

Question No. 31

Witness: John N. Voyles, Jr.

- Q-31. Refer to Voyles Testimony at page 6, Exhibit JNV-2, Environmental Air Compliance Strategy Summary. The discussion at the end of Section 3.0 indicates that the plans should not be considered final at this time. What is the expected range of actual expenditures that LG&E may incur for Projects 26 and 27?
- A-31. The discussion at the end of Section 3.0 relates to equipment specifications and design. The estimates contained in the Compliance Plan are reasonable for the purposes of evaluating and selecting technology for the Compliance Plan in this proceeding. Actual expenditures are monitored in the normal course through monthly ECR filings and further reviewed by the Commission in 6-month and 2-year review cases.

LOUISVILLE GAS AND ELECTRIC COMPANY

Response to Commission Staff's First Information Request Dated July 12, 2011

Case No. 2011-00162

Question No. 32

Witness: John N. Voyles, Jr.

- Q-32. Refer to Voyles Testimony. Provide the following information for each unit proposed for the addition of AQC equipment:
- a. Year placed in service;
 - b. The number of normal cycles (stops and starts);
 - c. The number of emergency trips and starts;
 - d. Heat rate;
 - e. Capacity factor;
 - f. Provide for the last 10 years of major internal and minor outages including the major projects completed during each outage;
 - g. Provide an outline of the major availability and performance detractors;
 - h. Provide a condition assessment that includes;
 - (1) Condition of turbine.
 - (2) Condition of generator.
 - (3) Condition of boiler.
 - (4) Condition of balance of plant equipment.
 - i. Provide any formal life assessment or extension reports.

A-32. a. The requested information is contained in the table below.

Unit	In-Service Date
Mill Creek 1	08/01/72
Mill Creek 2	07/01/74
Mill Creek 3	08/01/78
Mill Creek 4	09/01/82
Trimble County 1	12/23/90

b. The requested information is contained in the table below.

Actual Unit Starts	
Unit	2010
Mill Creek 1	22
Mill Creek 2	20
Mill Creek 3	14
Mill Creek 4	22
Trimble County 1	24

Source: Micro GADS NERC data.

c. The requested information is contained in the table below. Please note that emergency starts are not applicable to these coal units.

Actual NERC "U1" (Immediate) Forced Outages	
Unit	2010
Mill Creek 1	14
Mill Creek 2	8
Mill Creek 3	8
Mill Creek 4	14
Trimble County 1	19

Source: Micro GADS NERC data.

- d. The requested information is contained in the table below.

Actual NERC Net Heat Rate

<u>Unit</u>	<u>2010</u>
Mill Creek 1	10,684
Mill Creek 2	10,845
Mill Creek 3	10,738
Mill Creek 4	10,518
Trimble County 1	10,695

Source: Micro GADS NERC data and station reports.

- e. The requested information is contained in the table below.

Actual NERC Net Capacity Factor

<u>Unit</u>	<u>2010</u>
Mill Creek 1	75.69
Mill Creek 2	79.95
Mill Creek 3	84.45
Mill Creek 4	78.90
Trimble County 1	80.82

Source: Micro GADS NERC data.

- f. In response, please find attached a list of major capital projects performed during an outage in the last ten years. The Company is providing the requested information under a Petition for Confidential Protection being filed with the Commission.
- g. The requested information is contained in the table below.

2010 Events > 20,000 MWh by Unit:

<u>Unit Name</u>	<u>Event Type</u>	<u>Event Start</u>	<u>Event End</u>	<u>Event Hours</u>	<u>MWH Lost</u>	<u>Event Cause</u>
MC3	U1	1/17/10 6:46	1/19/10 21:51	63.08	25,044	ECONOMIZER LEAKS
MC3	MO	10/29/10 21:55	11/1/10 2:47	52.87	20,988	WET SCRUBBER/ABSORBER TOWER OR MODULE
MC3	MO	9/3/10 23:58	9/6/10 2:45	50.78	20,161	OTHER INDUCED DRAFT FAN PROBLEMS
MC4	MO	6/29/10 2:05	7/2/10 22:47	92.70	45,608	OTHER EXCITER PROBLEMS
MC4	MO	11/11/10 22:45	11/15/10 9:55	83.17	40,918	AIR HEATER FOULING (REGENERATIVE)
MC4	U1	12/12/10 17:16	12/16/10 4:05	82.82	40,746	FIRST SUPERHEATER LEAKS
MC4	MO	6/4/10 22:56	6/8/10 2:48	75.87	37,326	AIR HEATER (REGENERATIVE)
TC1	U1	1/17/10 11:09	2/3/10 15:32	412.38	212,377	GENERATOR HYDROGEN SEALS
TC1	U2	5/3/10 11:23	5/8/10 7:50	116.45	59,972	FIRST REHEATER LEAKS
TC1	U1	6/18/10 8:51	6/21/10 15:59	79.13	40,754	FIRST REHEATER LEAKS
TC1	MO	10/1/10 23:01	10/4/10 22:00	70.98	36,556	FIRST REHEATER LEAKS
TC1	U1	6/14/10 4:23	6/16/10 7:40	51.28	26,411	FIRST REHEATER LEAKS
TC1	SF	10/4/10 22:00	10/6/10 21:47	47.78	24,608	TURBINE LUBE OIL PUMPS
TC1	U2	2/27/10 18:47	3/1/10 14:15	43.47	22,385	FIRST REHEATER LEAKS
TC1	U3	6/5/10 3:27	6/6/10 20:12	40.75	20,986	SECOND SUPERHEATER LEAKS

h. Please see the attached CD in folder titled Question 32(h).

i. Please see the attached CD in folder titled Question 32(i).

Attachment to Response to LG&E KPSC-1 Question No. 32(f)

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LOUISVILLE GAS AND ELECTRIC COMPANY

Response to Commission Staff's First Information Request Dated July 12, 2011

Case No. 2011-00162

Question No. 33

Witness: John N. Voyles, Jr.

- Q-33. Refer to Voyles Testimony. Indicate whether any risk assessment was performed to determine probability of units meeting a 30 year projected life extension.
- A-33. Please see response to Question No. 32(h).

LOUISVILLE GAS AND ELECTRIC COMPANY

Response to Commission Staff's First Information Request Dated July 12, 2011

Case No. 2011-00162

Question No. 34

Witness: Charles R. Schram

- Q-34. Refer to Voyles Testimony. Are there any capital costs included in individual unit budgets for replacement of major plant components such as turbine shells, rotors, generator components, steam leads, heaters, or transformers? Have these costs been included in the economic assessment?
- A-34. Yes, capital costs are included in the economic assessment for projects related to the ongoing reliability and integrity of the individual units. Examples of these projects include stator rewinds, air heater basket replacements, and controls upgrades.

LOUISVILLE GAS AND ELECTRIC COMPANY

Response to Commission Staff's First Information Request Dated July 12, 2011

Case No. 2011-00162

Question No. 35

Witness: Charles R. Schram

Q-35. Refer to Voyles Testimony. Provide any analysis on replacement power costs for the 2015-2017 time period. Include potential long term purchases, bi-lateral contracts or other sources that may be available should there be delays in completing construction. What is the impact on heat rate of the selected option?

A-35. The 2011 Environmental Compliance Plan was developed based on a construction schedule for facilities necessary to comply with environmental regulations in the time specified by the environmental statutes in the CAAA and the EPA regulations. Relying on purchased power as a compliance measure would create market risk that could have a detrimental impact on customers. As in the past during large construction projects, if delays in construction occur, the Companies have taken various prudent measures to manage the cost impact to customers. Such measures have included the operation of combustion turbines, short-term purchases from the market, consent decrees with regulatory agencies (if permitted) or other changes to operations.

Long term purchases, bi-lateral contracts or other sources as well as delays in completing construction do not have an impact on heat rate.

LOUISVILLE GAS AND ELECTRIC COMPANY

Response to Commission Staff's First Information Request Dated July 12, 2011

Case No. 2011-00162

Question No. 36

Witness: John N. Voyles, Jr.

Q-36. Refer to Voyles Testimony at page 11, line 17.

- a. Was there any analysis that considered a long term outage to replace the existing FGD in its present location?
- b. What is the incremental cost in performance and ancillary services required for a FGD located further from the unit?

A-36. a. Yes, LG&E considered a long-term outage to replace the existing FGDs in the present locations. A review of substantially demolishing the existing two WFGDs in place and essentially performing a total rebuild that would require each unit to be off-line for two or more years versus constructing a single WFGD to service both units. Construction of a new, single WFGD allows the units to remain in-service during construction and then a short outage to tie them in to the new combined WFGD during four week outages.

- b. The location of the new WFGD will require negligible increases in auxiliary power consumption to account for the increased ductwork to account for the distance from the boilers compared to the location of the existing WFGDs.

LOUISVILLE GAS AND ELECTRIC COMPANY

Response to Commission Staff's First Information Request Dated July 12, 2011

Case No. 2011-00162

Question No. 37

Witness: Charles R. Schram

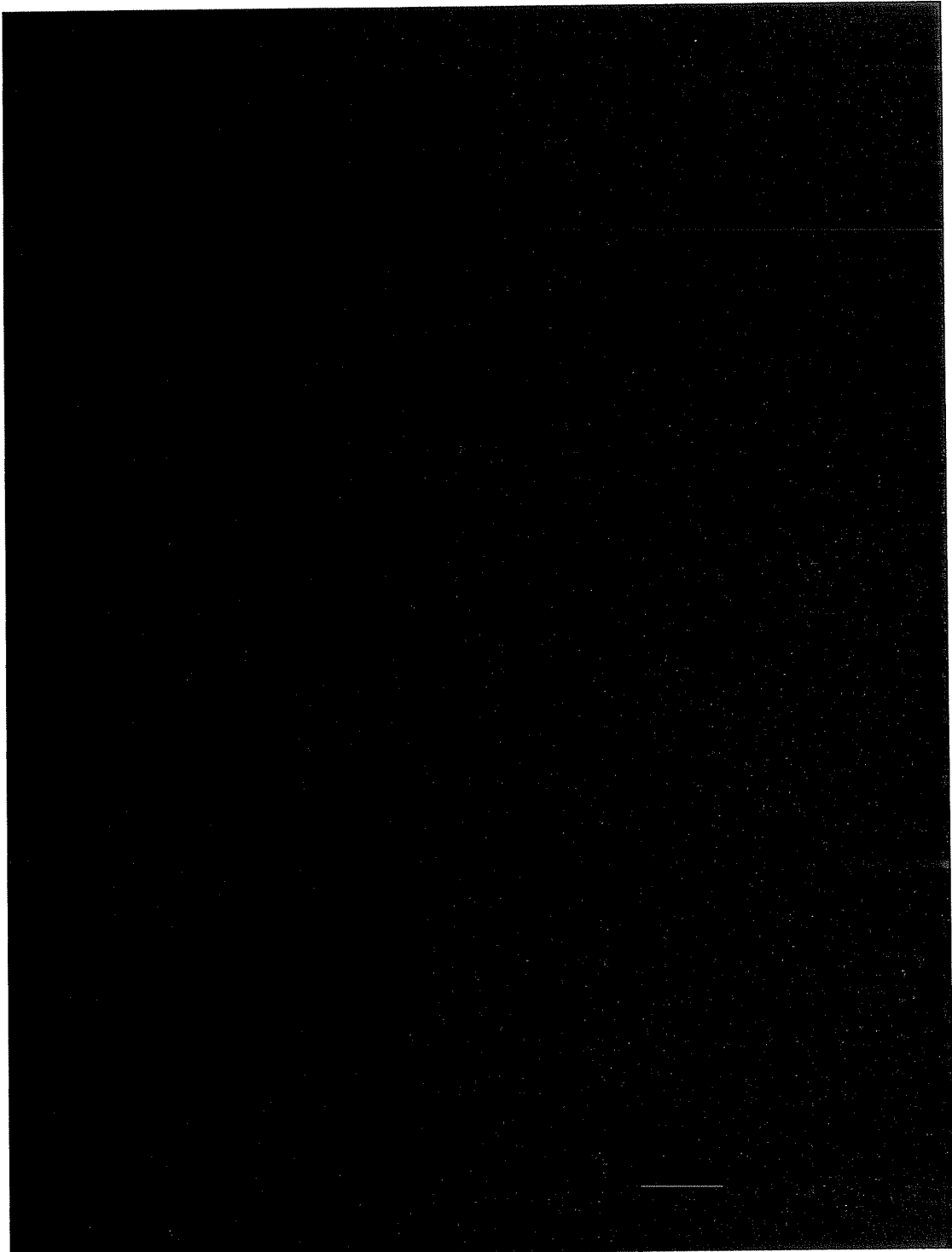
- Q-37. Refer to Voyles Testimony at page 24, line 10. Provide any analysis to support the conclusion that purchased power would be more expensive, given all factors.
- A-37. The Companies believe it is reasonable to expect that the coal units for which controls are proposed will continue to produce power at a lower cost than market power prices, based on current and forward market prices. Please see the average dispatch cost for the coal units for which controls are proposed in the attachment being provided pursuant to a Petition for Confidential Protection. These costs are below the around-the-clock electricity prices contained in the attachment to the response to Question No. 46.

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2011 2012 2013 2014 2015 2016 2017 2018 2019 2020 2021 2022 2023 2024 2025

Total Fuel Cost (\$000)

BROWN 1
BROWN 2
BROWN 3
BROWN 5
BROWN 6
BROWN 7
BROWN 8
BROWN 9
BROWN 10
BROWN 11
CANE RUN 4
CANE RUN 5
CANE RUN 6
CANE RUN 11
GHENT 1
GHENT 2
GHENT 3
GHENT 4
GRIVER 3
GRIVER 4
HAEFLING1
MILL CRK1
MILL CRK 2
MILL CRK 3
MILL CRK 4
OVEC 1
PADDYS 11
PADDYS 12
PADDYS 13
TC CT 5
TC CT 6
TC CT 7
TC CT 8
TC CT 9
TC CT 10
TC1 75% 1
TC2 75% 2
TYRONE 3
ZORN 1

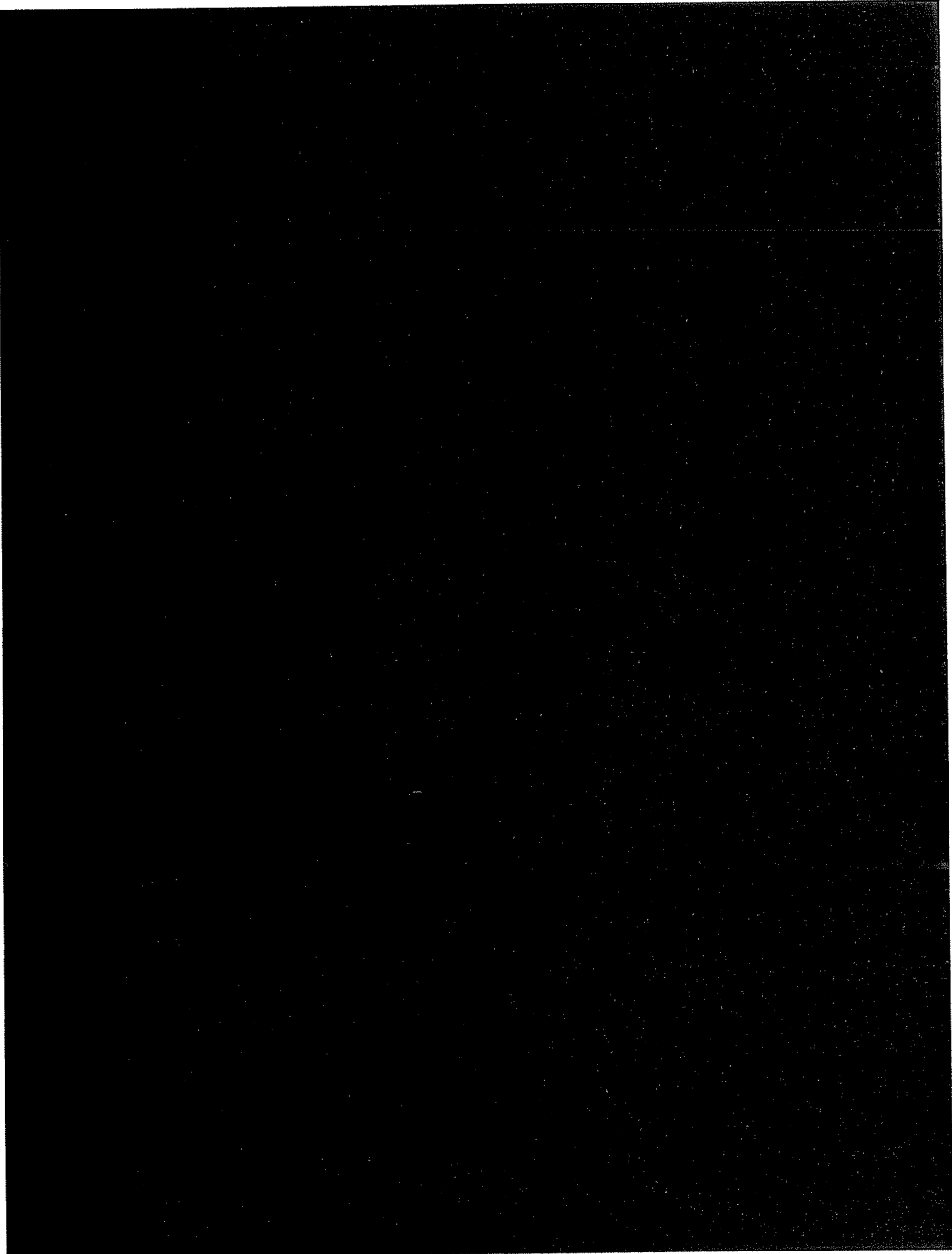


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2011 2012 2013 2014 2015 2016 2017 2018 2019 2020 2021 2022 2023 2024 2025

O&M Costs (\$000)

- BROWN 1
- BROWN 2
- BROWN 3
- BROWN 5
- BROWN 6
- BROWN 7
- BROWN 8
- BROWN 9
- BROWN 10
- BROWN 11
- CANE RUN 4
- CANE RUN 5
- CANE RUN 6
- CANE RUN 11
- GHENT 1
- GHENT 2
- GHENT 3
- GHENT 4
- GRRIVER 3
- GRRIVER 4
- HAFLING11
- MILL CRK 1
- MILL CRK 2
- MILL CRK 3
- MILL CRK 4
- OVEC 1
- PADDYS 11
- PADDYS 12
- PADDYS 13
- TCCT 5
- TCCT 6
- TCCT 7
- TCCT 8
- TCCT 9
- TCCT 10
- TC1 75% 1
- TC2 75% 2
- TYRONE 3
- ZORN 1

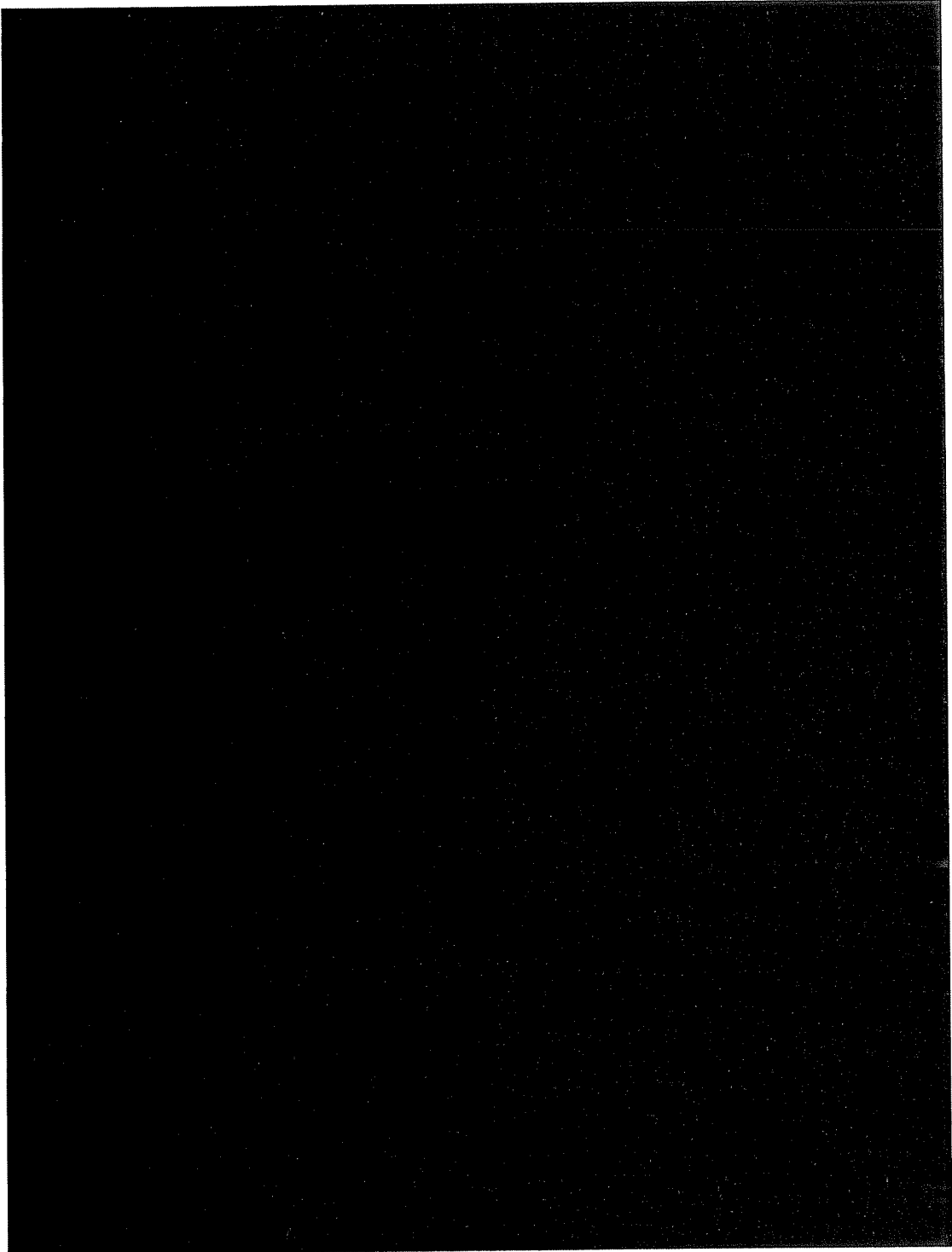


CONFIDENTIAL INFORMATION REDACTED

2011 2012 2013 2014 2015 2016 2017 2018 2019 2020 2021 2022 2023 2024 2025

Generation (GWh)

BROWN 1
BROWN 2
BROWN 3
BROWN 5
BROWN 6
BROWN 7
BROWN 8
BROWN 9
BROWN 10
BROWN 11
CANE RUN 4
CANE RUN 5
CANE RUN 6
CANE RUN 11
GHENT 1
GHENT 2
GHENT 3
GHENT 4
GRRIVER 3
GRRIVER 4
HAEFLING1
MILL CRK 1
MILL CRK 2
MILL CRK 3
MILL CRK 4
OVEC 1
PADDYS 11
PADDYS 12
PADDYS 13
TC CT 5
TC CT 6
TC CT 7
TC CT 8
TC CT 9
TC CT 10
TC1 75% 1
TC2 75% 2
TYRONE 3
ZORN 1

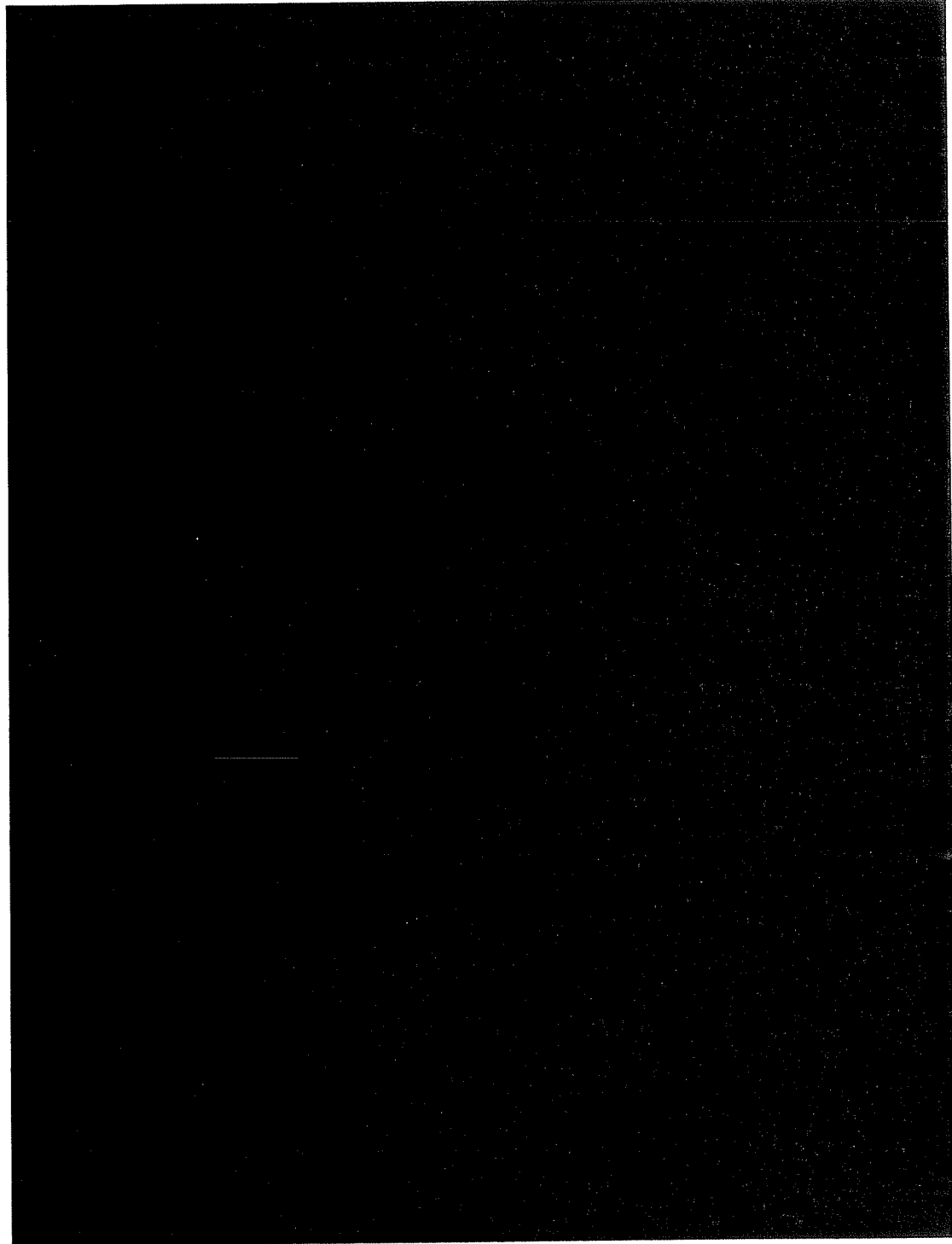


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2026 2027 2028 2029 2030 2031 2032 2033 2034 2035 2036 2037 2038 2039 2040

Total Fuel Cost (\$000)

- BROWN 1
- BROWN 2
- BROWN 3
- BROWN 5
- BROWN 6
- BROWN 7
- BROWN 8
- BROWN 9
- BROWN 10
- BROWN 11
- CANE RUN 4
- CANE RUN 5
- CANE RUN 6
- CANE RUN 11
- GHENT 1
- GHENT 2
- GHENT 3
- GHENT 4
- GRRIVER 3
- GRRIVER 4
- HAFLING1 1
- MILL CRK 1
- MILL CRK 2
- MILL CRK 3
- MILL CRK 4
- OVEC 1
- PADDYS 11
- PADDYS 12
- PADDYS 13
- TC CT 5
- TC CT 6
- TC CT 7
- TC CT 8
- TC CT 9
- TC CT 10
- TC1 75% 1
- TC2 75% 2
- TYRONE 3
- ZORN 1

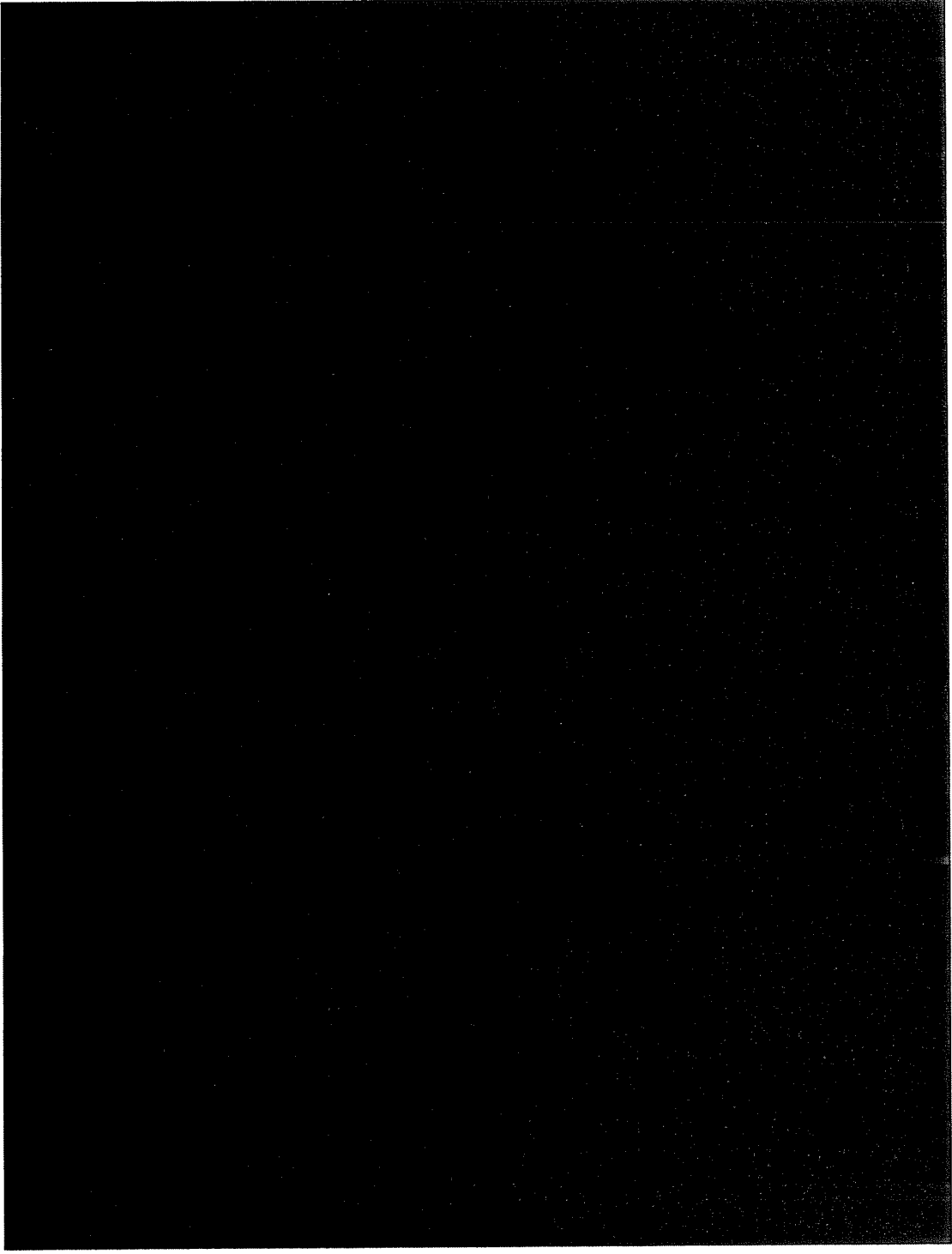


CONFIDENTIAL INFORMATION REDACTED

2026 2027 2028 2029 2030 2031 2032 2033 2034 2035 2036 2037 2038 2039 2040

O&M Costs (\$000)

BROWN 1
 BROWN 2
 BROWN 3
 BROWN 5
 BROWN 6
 BROWN 7
 BROWN 8
 BROWN 9
 BROWN 10
 BROWN 11
 CANE RUN 4
 CANE RUN 5
 CANE RUN 6
 CANE RUN 11
 GHENT 1
 GHENT 2
 GHENT 3
 GHENT 4
 GRRIVER 3
 GRRIVER 4
 HAEFLNG11
 MILL CRK 1
 MILL CRK 2
 MILL CRK 3
 MILL CRK 4
 OVEC 1
 PADDYS 11
 PADDYS 12
 PADDYS 13
 TCCT 5
 TCCT 6
 TCCT 7
 TCCT 8
 TCCT 9
 TCCT 10
 TC1.75% 1
 TC2.75% 2
 TYRONE 3
 ZORN 1

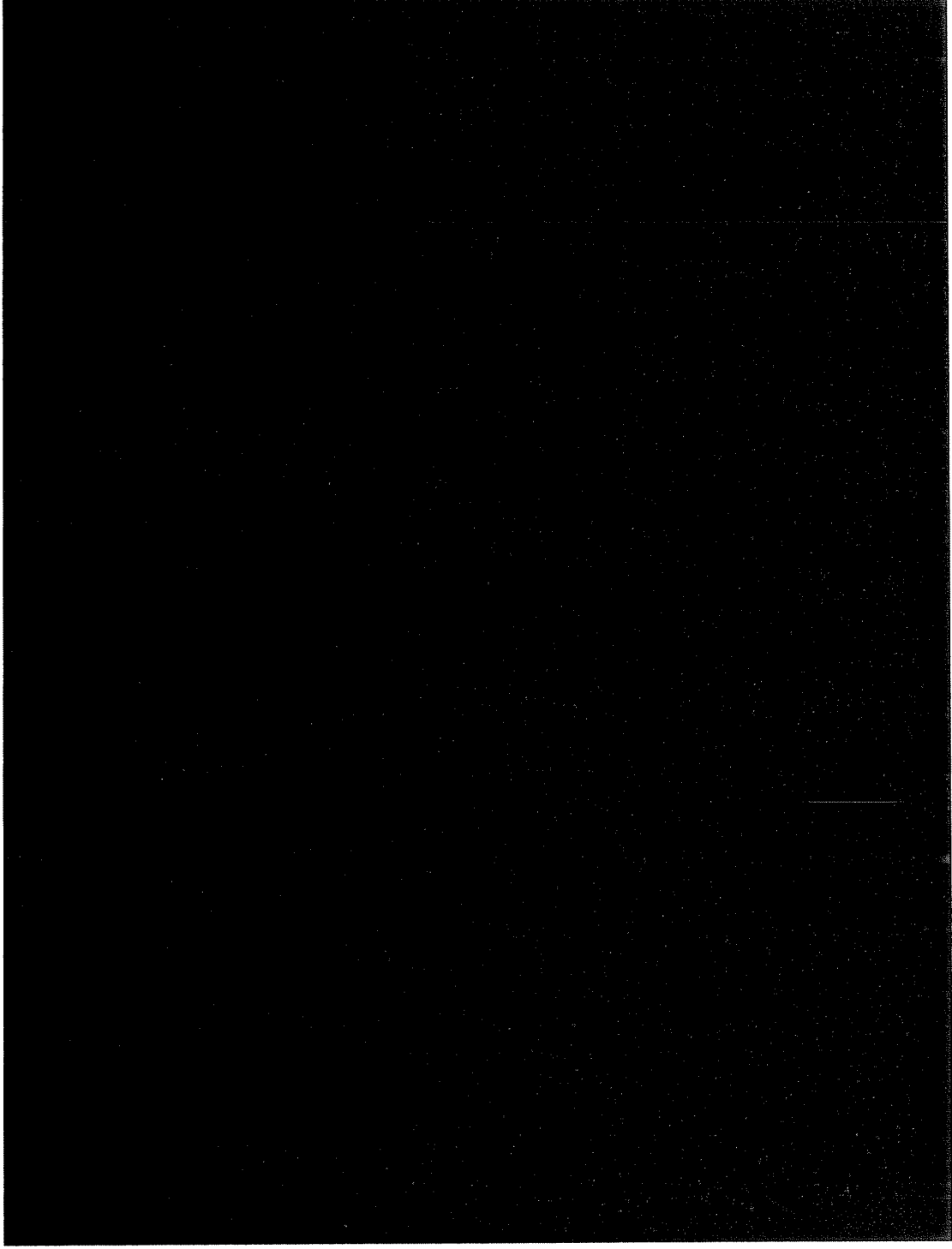


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2026 2027 2028 2029 2030 2031 2032 2033 2034 2035 2036 2037 2038 2039 2040

Generation (GWh)

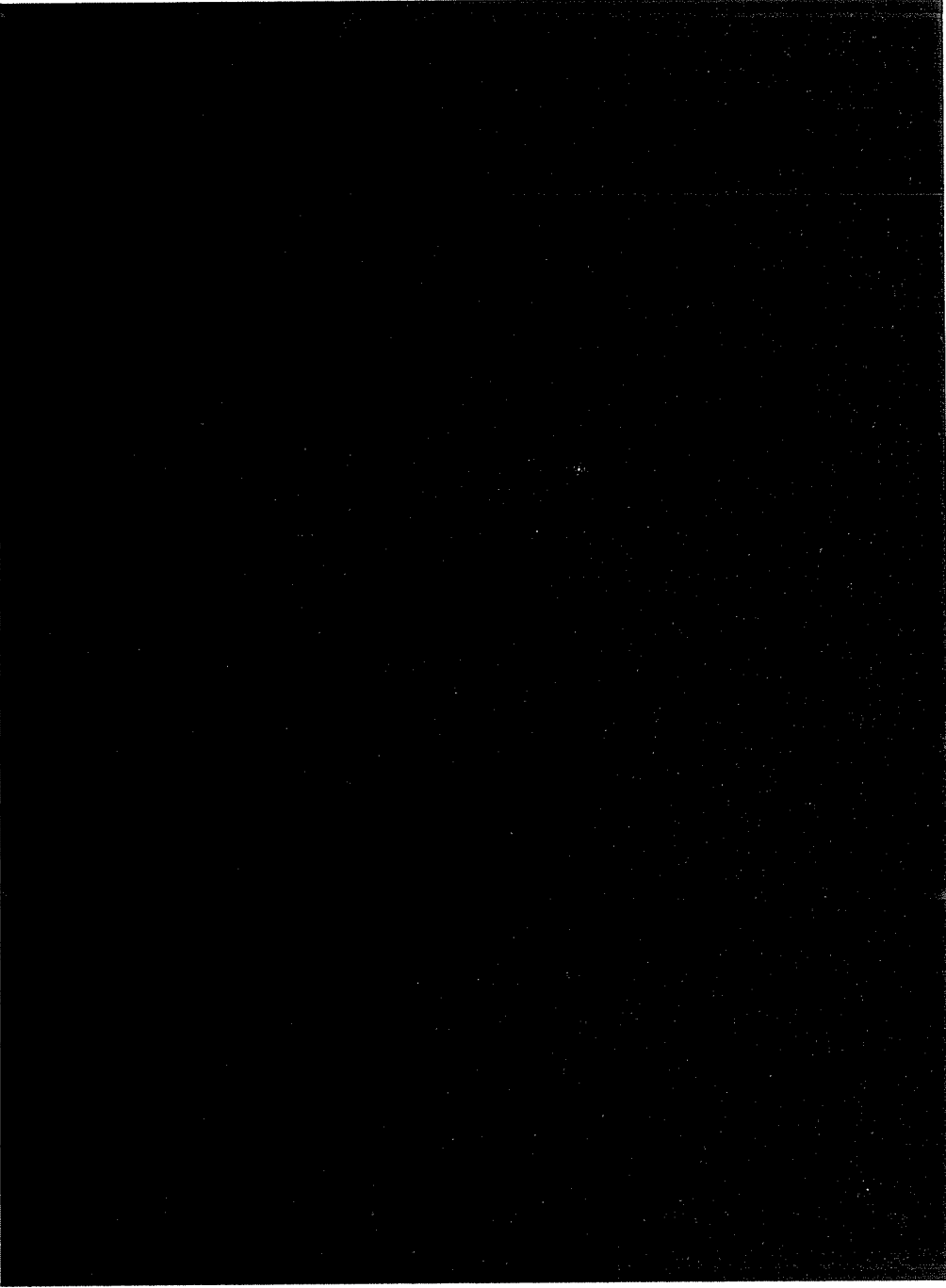
- BROWN 1
- BROWN 2
- BROWN 3
- BROWN 5
- BROWN 6
- BROWN 7
- BROWN 8
- BROWN 9
- BROWN 10
- BROWN 11
- CANE RUN 4
- CANE RUN 5
- CANE RUN 6
- CANE RUN 11
- GHENT 1
- GHENT 2
- GHENT 3
- GHENT 4
- GRRIVER 3
- GRRIVER 4
- HAEFLING1
- MILL CRK 1
- MILL CRK 2
- MILL CRK 3
- MILL CRK 4
- OVEC 1
- PADDYS 11
- PADDYS 12
- PADDYS 13
- TCCT 5
- TCCT 6
- TCCT 7
- TCCT 8
- TCCT 9
- TCCT 10
- TC1.75% 1
- TC2.75% 2
- TYRONE 3
- ZORN 1



CONFIDENTIAL INFORMATION REDACTED

Average Dispatch Cost (\$/MWh)

2011 2012 2013 2014 2015 2016 2017 2018 2019 2020 2021 2022 2023 2024 2025

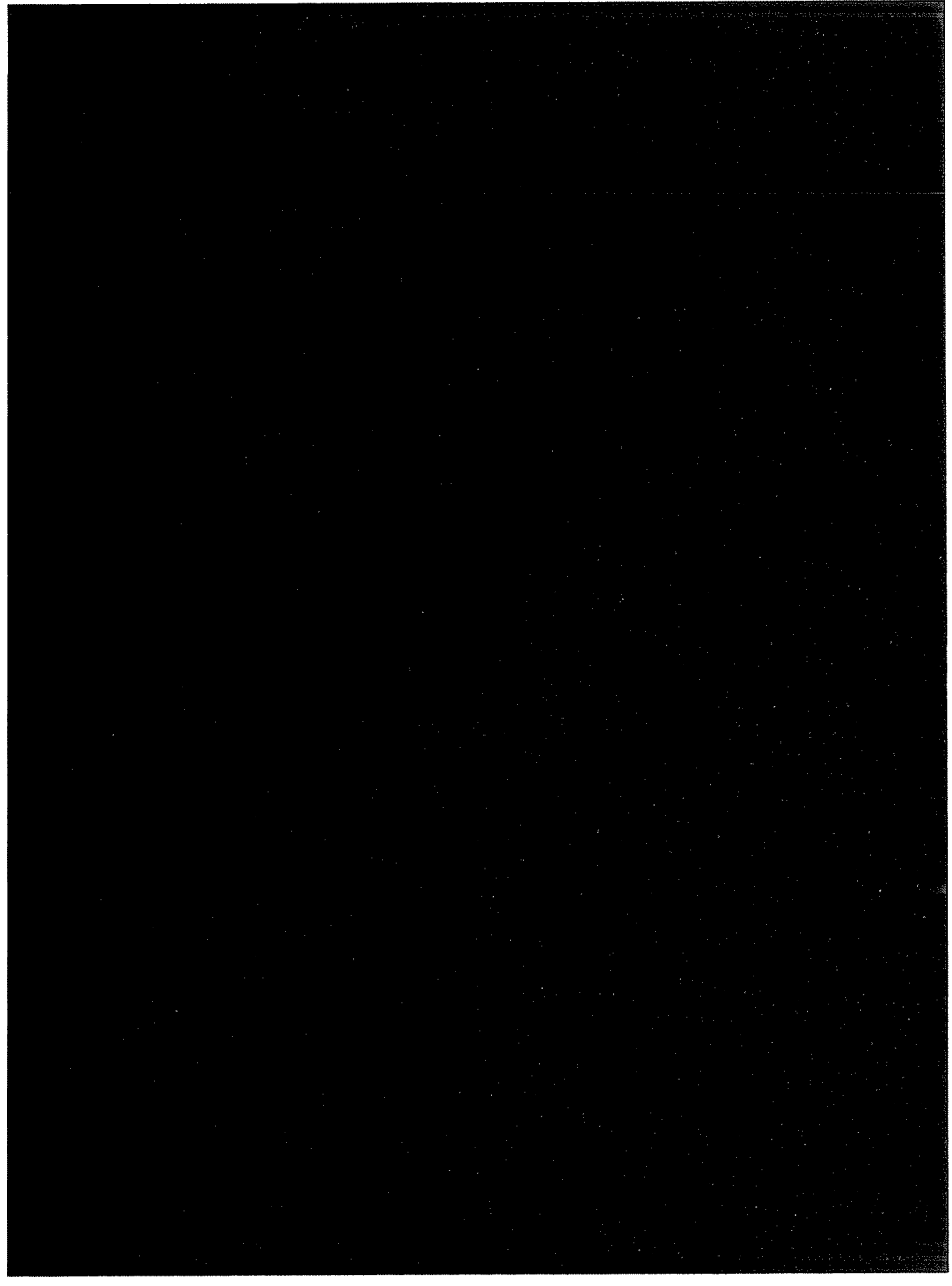


BROWN 1
BROWN 2
BROWN 3
BROWN 5
BROWN 6
BROWN 7
BROWN 8
BROWN 9
BROWN 10
BROWN 11
CANE RUN 4
CANE RUN 5
CANE RUN 6
CANE RUN 11
GHENT 1
GHENT 2
GHENT 3
GHENT 4
GRRIVER 3
GRRIVER 4
HAEFLING1
MILL CRK 1
MILL CRK 2
MILL CRK 3
MILL CRK 4
OVEC 1
PADDYS 11
PADDYS 12
PADDYS 13
TCCT 5
TCCT 6
TCCT 7
TCCT 8
TCCT 9
TCCT 10
TC1 75% 1
TC2 75% 2
TYRONE 3
ZORN 1

CONFIDENTIAL INFORMATION REDACTED

Average Dispatch Cost (\$/MWh)

2026 2027 2028 2029 2030 2031 2032 2033 2034 2035 2036 2037 2038 2039 2040



BROWN 1
BROWN 2
BROWN 3
BROWN 5
BROWN 6
BROWN 7
BROWN 8
BROWN 9
BROWN 10
BROWN 11
CANE RUN 4
CANE RUN 5
CANE RUN 6
CANE RUN 11
GHENT 1
GHENT 2
GHENT 3
GHENT 4
GRRIVER 3
GRRIVER 4
HAEFLINGI 1
MILL CRK 1
MILL CRK 2
MILL CRK 3
MILL CRK 4
OVEC 1
PADDYS 11
PADDYS 12
PADDYS 13
TC CT 5
TC CT 6
TC CT 7
TC CT 8
TC CT 9
TC CT 10
TC1 75% 1
TC2 75% 2
TYRONE 3
ZORN 1

LOUISVILLE GAS AND ELECTRIC COMPANY

Response to Commission Staff's First Information Request Dated July 12, 2011

Case No. 2011-00162

Question No. 38

Witness: John N. Voyles, Jr.

- Q-38. Refer to Voyles Testimony. Provide a color copy of the May 2011 presentation titled "Existing and Preliminary Air Quality Control Process flow Diagrams"
- A-38. A color copy of the May 2011 presentation was included in the Application as Exhibit JNV-3. A color copy is attached to this response.

**Attachment to KPSC Question No. 38 – Existing & Preliminary Future Air Quality Control
Process Flow Diagrams
Witness: Voyles**

Existing & Preliminary Future Air Quality Control Process Flow Diagrams

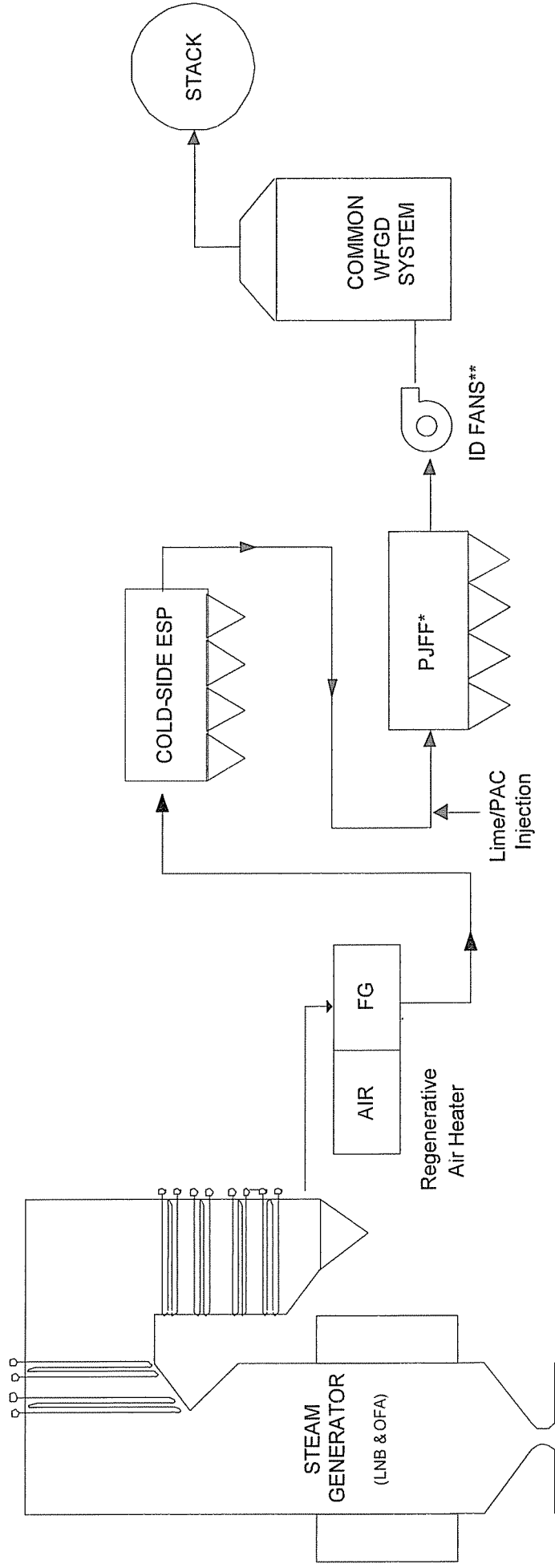
For Mill Creek Generating Station and Trimble County Unit 1



PPL companies

May 2011

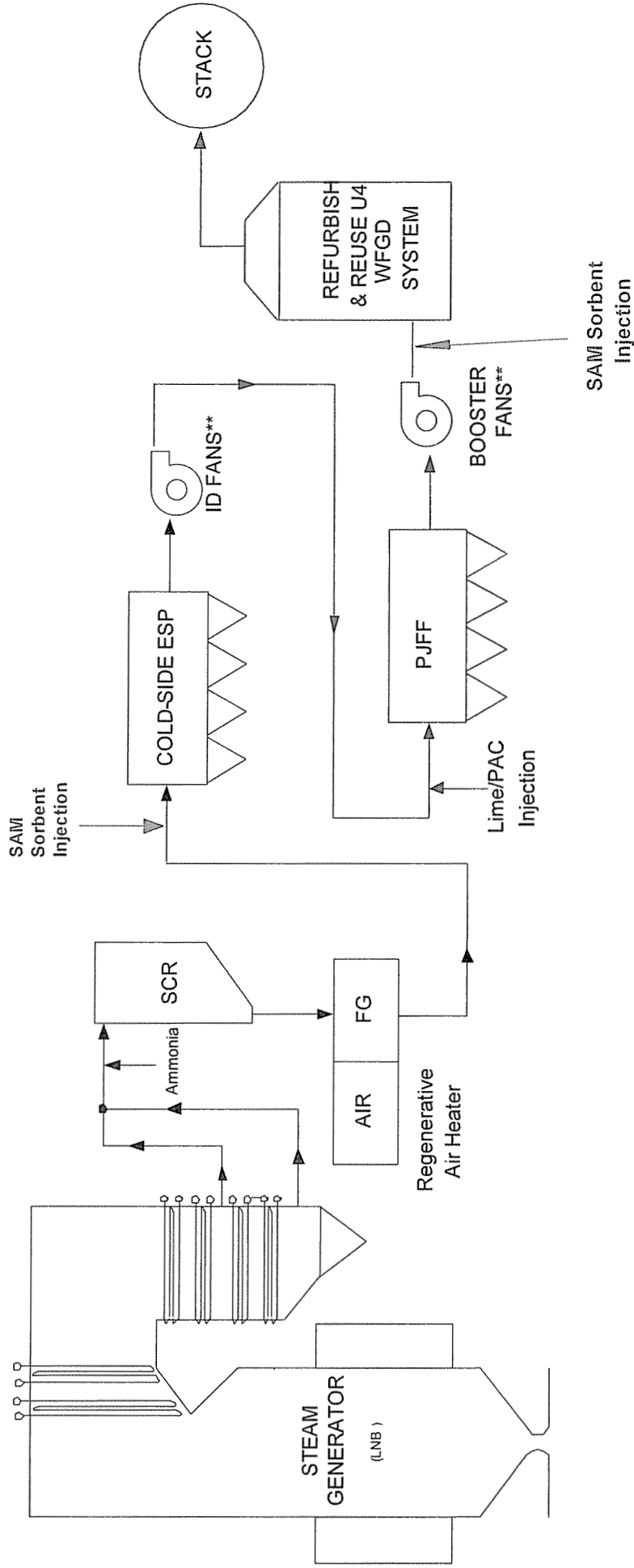
Mill Creek Unit 1 and 2 AQC Process Flow Diagram



***Replacement to new Booster Fans or larger ID Fans is yet to be determined*

Black = Existing
Red = Preliminary Additions

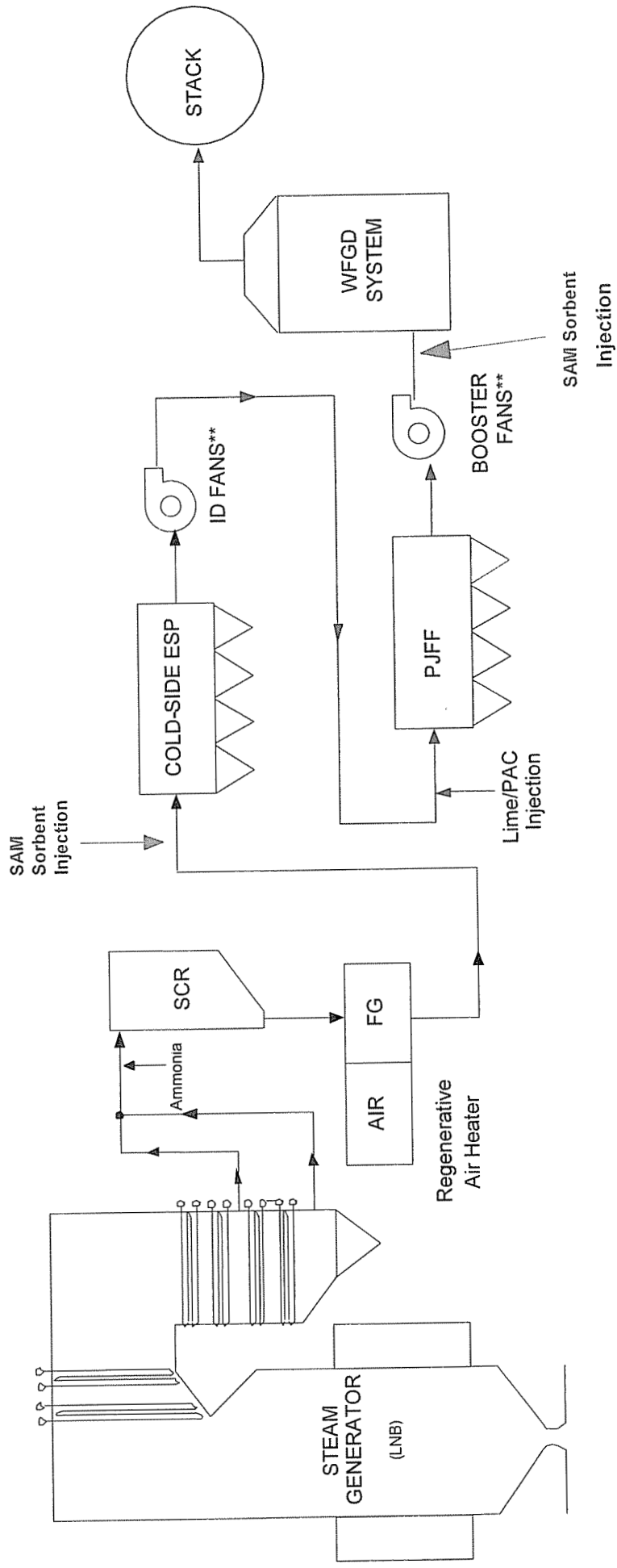
Mill Creek Unit 3 AQC Process Flow Diagram



***Replacement to new Booster Fans or larger ID Fans is yet to be determined*

Black = Existing
 Red = Preliminary Additions
 Green = Previously approved. Not yet installed.

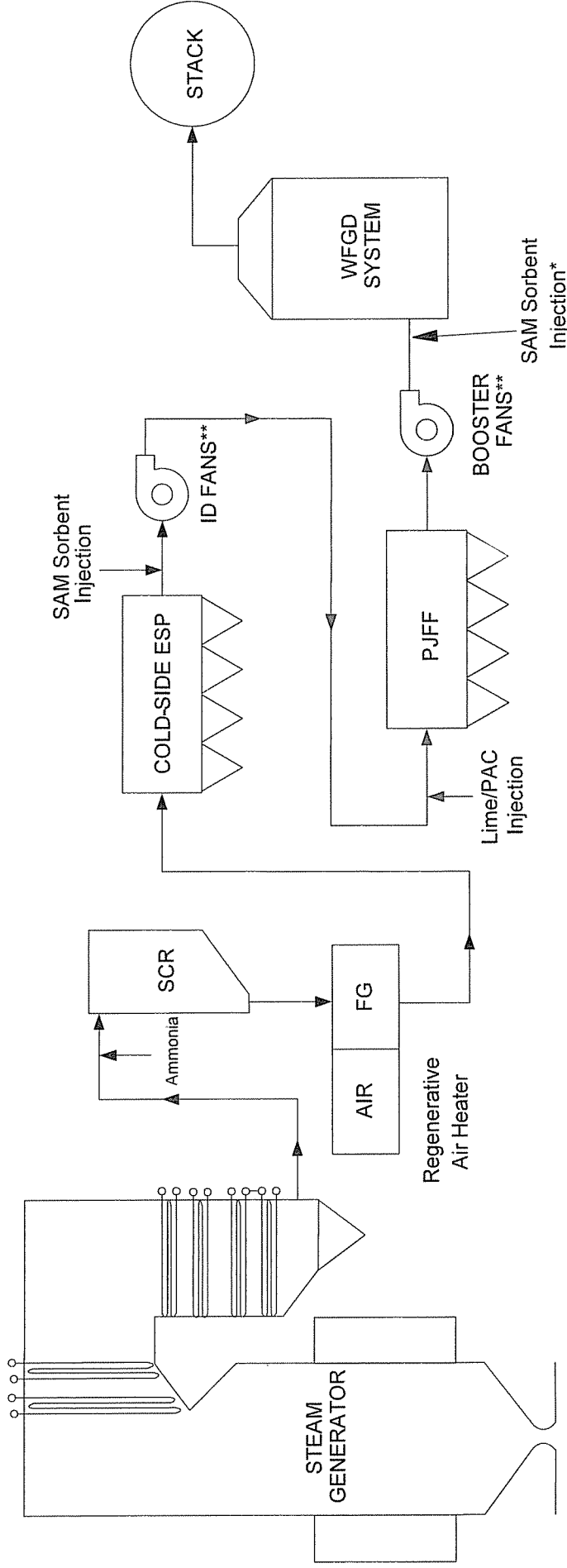
Mill Creek Unit 4 AQC Process Flow Diagram



**Replacement to new Booster Fans or larger ID Fans is yet to be determined

Black = Existing
 Red = Preliminary Additions
 Green = Previously approved. Not yet installed.

Trimble County Unit 1 AQC Process Flow Diagram



*Relocation of existing Injection Nozzles
 **Replacement to new Booster Fans or larger ID Fans is yet to be determined

Black = Existing
 Red = Preliminary Additions

LOUISVILLE GAS AND ELECTRIC COMPANY

Response to Commission Staff's First Information Request Dated July 12, 2011

Case No. 2011-00162

Question No. 39

Witness: Gary H. Revlett

- Q-39. Refer to the Direct Testimony of Gary H. Revlett ("Revlett Testimony"). Did LG&E or any of the PPL affiliated entities file comments on the May 3, 2011 version of EPA's HAPs proposed rule? If so, provide a copy of the comments.
- A-39. While the due date for the comment period for EPA's proposed HAPs rule was extended to August 4, 2011, the date at which they will issue the final rule remains November 16, 2011. Comments for this rulemaking will be provided under a joint effort among all PPL entities to EPA by the August 4, 2011 due date. Upon completion and submittal, a copy will be provided to the KPSC.

LOUISVILLE GAS AND ELECTRIC COMPANY

Response to Commission Staff's First Information Request Dated July 12, 2011

Case No. 2011-00162

Question No. 40

Witness: Gary H. Revlett

- Q-40. Refer to Revlett Testimony at page 7, lines 19-20. Mr. Revlett's testimony notes that EPA expects to issue proposed rules for CATR II in the near future. It appears that the proposed regulation will likely result in further nitrogen compound ("NO_x") and SO₂ restrictions.
- a. Although the specifics of CATR II are not known, does LG&E believe that the modifications proposed in this proceeding are likely to meet the more stringent compliance requirements of CATR II?
 - b. Was the impact of carbon regulation considered as part of LG&E's analysis to determine the modifications proposed in this proceeding?
 - c. Was the impact of NAAQS revisions considered as part of LG&E's analysis to determine the modifications proposed in this proceeding?
- A-40.
- a. The initial compliance year under the new Cross-State Air Pollution Rule (CSAPR) is 2012; therefore, it is necessary to continue with the modifications proposed in this proceeding to be in compliance with CSAPR. The effective date and reduction requirements of CATR II remain unknown. However, any additional requirements from CATR II will likely require the installation of additional controls for NO_x on units that currently do not have SCRs. The addition of SCRs on units that do not currently have SCRs will not have an impact on the projects in this Compliance Plan.
 - b. Yes. Please see the response to Question No. 2.
 - c. Yes, the impact of NAAQS revisions was considered. Computer modeling of the new 1-hour SO₂ NAAQS standard indicated excursions near the Mill Creek and Cane Run facilities and that high efficiency FGD systems would be required to demonstrate compliance with new NAAQS.

LOUISVILLE GAS AND ELECTRIC COMPANY

Response to Commission Staff's First Information Request Dated July 12, 2011

Case No. 2011-00162

Question No. 41

Witness: Charles R. Schram

Q-41. Refer to Schram Testimony at page 4, lines 7-10. There it states that it was "assumed that the proposed suite of environmental facilities for each unit was the most cost-effective suite of facilities for the unit". However, it appears that with the assistance of Black and Veatch the most compliance-effective suite of facilities was selected. Explain how this assumption translates to most cost-effective suite of facilities.

A-41. Please see the response to Question No. 5.

LOUISVILLE GAS AND ELECTRIC COMPANY

Response to Commission Staff's First Information Request Dated July 12, 2011

Case No. 2011-00162

Question No. 42

Witness: Charles R. Schram

Q-42. Refer to Schram Testimony at page 5, lines 4-6. Provide any analysis that supports conclusion that gas combined cycle is only the replacement technology.

A-42. Please see the response to Question No. 44.

LOUISVILLE GAS AND ELECTRIC COMPANY

Response to Commission Staff's First Information Request Dated July 12, 2011

Case No. 2011-00162

Question No. 43

Witness: Charles R. Schram

Q-43. Refer to Schram Testimony at page 5, lines 7-13. Why was a thirty year extension used for every unit? Was sensitivity analysis conducted for shorter lives for older units?

A-43. Please see the response to Question Nos. 4 and 61.

LOUISVILLE GAS AND ELECTRIC COMPANY

Response to Commission Staff's First Information Request Dated July 12, 2011

Case No. 2011-00162

Question No. 44

Witness: Charles R. Schram

- Q-44. Refer to Schram Testimony. For the evaluation of the LG&E air compliance projects, the construction of the environmental controls was compared to the retirement of the generation unit to determine the least cost method of compliance. At page 5, lines 5-6, of Schram Testimony, it states that the replacement generation technology for the purposes of this analysis was a natural gas fired combined cycle combustion turbine.
- a. Was any consideration given to constructing a coal-fired generating unit?
 - b. Explain why a coal-fired unit was not included in the analysis.
- A-44. Yes, a coal-fired unit was considered as a supply side resource. The Companies' 2011 IRP, which included coal units as a resource choice, indicated that natural gas fired combined cycle combustion turbines are the least cost resource to meet requirements for the intermediate load capacity needed in 2016. As noted in the attached page from the Companies' 2011 IRP, Volume 3, the next three units in the base expansion plan are 3x1 combined cycle combustion turbines (denoted as "3x1C"). The historical capacity factors of the units planned for retirement are well below the baseload levels which would support the selection of a coal unit with high capital costs and lower fuel costs compared to natural gas. Furthermore, based on historical experience, it would not be possible to permit and construct a coal unit by January 1, 2016.

- and installing the necessary emissions controls on existing units to meet the proposed environmental regulations.

For reference, this least cost base plan will be referred to as Plan “A” and it represents the 30-year expansion strategy that minimizes the present value of revenue requirements criterion under the base assumptions. As seen in Table 3, optimization results using the base assumptions indicate that the optimal plan is the installation of three 3x1 combined cycle units: one in 2016, one in 2018, and one in 2025.

Table 3
Base Expansion Plan

Plan:	"A"
2011	
2012	
2013	
2014	
2015	
2016	3x1C
2017	
2018	3x1C
2019	
2020	
2021	
2022	
2023	
2024	
2025	3x1C

With this plan, there is a 40 MW reserve margin shortfall in 2015 when the summer reserve margin was allowed to drop to approximately 15.4%, as shown in Table 8.(4)(a)-1 in Section 8 of Volume I. In 2015 and in other years with relatively small reserve margin deficits immediately

LOUISVILLE GAS AND ELECTRIC COMPANY

Response to Commission Staff's First Information Request Dated July 12, 2011

Case No. 2011-00162

Question No. 45

Witness: Charles R. Schram

- Q-45. Refer to Schram Testimony. Provide the fuel forecasts for coal by type and natural gas as well as the source of the forecasts that were used to perform the analyses in Exhibit CRS-1, 2011 Air Compliance Plan.
- A-45. Please see the attachment being provided pursuant to a Petition for Confidential Protection.

CONFIDENTIAL INFORMATION REDACTED

Fuel Costs (\$/MBtu)

	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025
Brown Coal															
Cane Run Coal															
Ghent Coal															
Green River Coal															
Mill Creek Coal															
Trimble County Coal															
Trimble County PRB Coal															
Tyrone Coal															
KU Gas															
LGE Gas															
Haefling Gas															

*Beyond 2025, fuel prices were held constant to maintain a consistent relationship between coal and gas prices.

**The 2011 portion of the coal forecasts is based on responses to the Companies' RFQ for coal in early 2010. The 2012-2014 portion of the coal forecasts is computed as a weighted average of the same RFQ prices and prices from a 2010 Wood-Mackenzie forecast (the weighting of RFQ prices to Wood-Mackenzie prices in 2012, 2013, and 2014 is 75/25, 50/50, and 25/75, respectively). Beyond 2014, the coal forecasts are based entirely on the 2010 Wood-Mackenzie forecast.

***The 2011-2013 portion of the gas forecasts are based on Henry Hub market forwards as of June 2010. Beyond 2015, the forecast is based on PIRA's Spring 2010 natural gas forecast. The 2014-2015 portion of the forecast is interpolated.

LOUISVILLE GAS AND ELECTRIC COMPANY

Response to Commission Staff's First Information Request Dated July 12, 2011

Case No. 2011-00162

Question No. 46

Witness: Charles R. Schram

- Q-46. Refer to Schram Testimony. Provide details that describe both Strategist and PROSYM, including:
- a. Details on license, operation and any modifications developed for KU/LG&E;
 - b. Inputs for all KU units, including, size, heat rate, outage projections, O&M costs, and other parameters used in the model;
 - c. Provide all inputs from outside the KU/LGE system that are used in the models; and
 - d. When were model inputs updated? Do they consider projected changes in regional capacity and pricing due to the very AQC charges being proposed by KU/LG&E? Are retirements of units by utilities in other regions included in the models?
- A-46. a. The Companies own software version 4.4.1 of Strategist and version 5.2.21 of PROSYM, both of which are Ventyx products. Generally, the Companies compile information for the cost of generation for each unit, a description of the generation capabilities of each unit, a load forecast, the market price of electricity, and the volumetric ability to access the market to make economical power purchases. All of this information is brought together to model the economic operation of the Companies' generating system. Strategist does not include any modifications developed for the Companies. The attachments to parts (b) and (c) below contain the documentation of the assumptions for the units' capacities, heat rates, maintenance schedules, forced outage rates and variable O&M. PROSYM includes a customized feature that allows the Companies to approximate the results of the Companies' After-the-Fact Billing ("AFB") process. AFB is used to identify and determine the cost of actual intercompany transactions and for assigning actual off-system sales and purchases to the two utilities. PROSYM's AFB feature is a stand-alone process that does not affect PROSYM's normal operation and was not used in the 2011 Compliance Plan.

- b. Please see the attachment being provided pursuant to a Petition for Confidential Protection.
- c. Please see the attachment.
- d. The model inputs are updated annually. The inputs for the 2011 Compliance Plan analysis are consistent with the 2011 IRP filed with the Commission on April 21, 2011. The Companies use the EPIS Aurora model for regional power market modeling. The resulting power prices from this model are inputs into Strategist and PROSYM. The Companies used screening criteria for eastern interconnect generating units to estimate the retirement of 21 GW of coal-fired generation capacity in the eastern interconnect. The modeled prices reflect these estimated retirements.

Summer Maximum Capacity (MW)

	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025
Brown 1	106	106	106	105	105	105	105	105	105	105	105	105	105	105	105
Brown 2	166	166	166	164	164	164	164	164	164	164	164	164	164	164	164
Brown 3	411	406	406	406	401	401	401	401	401	401	401	401	401	401	401
Brown 5	122	122	122	122	122	122	122	122	122	122	122	122	122	122	122
Brown 6	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146
Brown 7	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146
Brown 8	121	121	121	121	121	121	121	121	121	121	121	121	121	121	121
Brown 9	121	121	121	121	121	121	121	121	121	121	121	121	121	121	121
Brown 10	121	121	121	121	121	121	121	121	121	121	121	121	121	121	121
Brown 11	121	121	121	121	121	121	121	121	121	121	121	121	121	121	121
Cane Run 4	155	155	155	153	153	153	153	153	153	153	153	153	153	153	153
Cane Run 5	168	168	168	166	166	166	166	166	166	166	166	166	166	166	166
Cane Run 6	240	240	240	237	237	237	237	237	237	237	237	237	237	237	237
Cane Run 11	14	14	14	14	14	14	14	14	14	14	14	14	14	14	14
Ghent 1	493	493	493	487	487	487	487	487	487	487	487	487	487	487	487
Ghent 2	490	490	490	490	481	481	481	481	481	481	481	481	481	481	481
Ghent 3	454	454	454	454	454	448	448	448	448	448	448	448	448	448	448
Ghent 4	487	487	487	487	487	481	481	481	481	481	481	481	481	481	481
Green River 3	68	68	68	66	66	66	66	66	66	66	66	66	66	66	66
Green River 4	95	95	95	92	92	92	92	92	92	92	92	92	92	92	92
Haefling 1-3	36	36	36	36	36	36	36	36	36	36	36	36	36	36	36
Mill Creek 1	303	303	303	303	300	300	300	300	300	300	300	300	300	300	300
Mill Creek 2	301	301	301	301	297	297	297	297	297	297	297	297	297	297	297
Mill Creek 3	391	391	391	391	390	385	385	385	385	385	385	385	385	385	385
Mill Creek 4	477	477	477	477	467	467	467	467	467	467	467	467	467	467	467
OVEC	156	155	154	152	152	152	152	152	152	152	152	152	152	152	152
Paddy's Run 11	12	12	12	12	12	12	12	12	12	12	12	12	12	12	12
Paddy's Run 12	23	23	23	23	23	23	23	23	23	23	23	23	23	23	23
Paddy's Run 13	158	158	158	158	158	158	158	158	158	158	158	158	158	158	158
Trimble County 5	160	160	160	160	160	160	160	160	160	160	160	160	160	160	160
Trimble County 6	160	160	160	160	160	160	160	160	160	160	160	160	160	160	160
Trimble County 7	160	160	160	160	160	160	160	160	160	160	160	160	160	160	160
Trimble County 8	160	160	160	160	160	160	160	160	160	160	160	160	160	160	160
Trimble County 9	160	160	160	160	160	160	160	160	160	160	160	160	160	160	160
Trimble County 10	160	160	160	160	160	160	160	160	160	160	160	160	160	160	160
Trimble County 1 (75%)	383	383	383	383	383	379	379	379	379	379	379	379	379	379	379
Trimble County 2 (75%)	549	549	549	549	549	549	549	549	549	549	549	549	549	549	549
Tyrone 3	71	71	71	69	69	69	69	69	69	69	69	69	69	69	69
Zorn 1	14	14	14	14	14	14	14	14	14	14	14	14	14	14	14
Ohio Falls 1-8	52	56	58	62	64	64	64	64	64	64	64	64	64	64	64
Dix Dam 1-3	26	28	30	30	30	30	30	30	30	30	30	30	30	30	30

Summer Maximum Capacity (MW)

	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040
Brown 1	105	105	105	105	105	105	105	105	105	105	105	105	105	105	105
Brown 2	164	164	164	164	164	164	164	164	164	164	164	164	164	164	164
Brown 3	401	401	401	401	401	401	401	401	401	401	401	401	401	401	401
Brown 5	122	122	122	122	122	122	122	122	122	122	122	122	122	122	122
Brown 6	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146
Brown 7	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146
Brown 8	121	121	121	121	121	121	121	121	121	121	121	121	121	121	121
Brown 9	121	121	121	121	121	121	121	121	121	121	121	121	121	121	121
Brown 10	121	121	121	121	121	121	121	121	121	121	121	121	121	121	121
Brown 11	121	121	121	121	121	121	121	121	121	121	121	121	121	121	121
Cane Run 4	153	153	153	153	153	153	153	153	153	153	153	153	153	153	153
Cane Run 5	166	166	166	166	166	166	166	166	166	166	166	166	166	166	166
Cane Run 6	237	237	237	237	237	237	237	237	237	237	237	237	237	237	237
Cane Run 11	14	14	14	14	14	14	14	14	14	14	14	14	14	14	14
Ghent 1	487	487	487	487	487	487	487	487	487	487	487	487	487	487	487
Ghent 2	481	481	481	481	481	481	481	481	481	481	481	481	481	481	481
Ghent 3	448	448	448	448	448	448	448	448	448	448	448	448	448	448	448
Ghent 4	481	481	481	481	481	481	481	481	481	481	481	481	481	481	481
Green River 3	66	66	66	66	66	66	66	66	66	66	66	66	66	66	66
Green River 4	92	92	92	92	92	92	92	92	92	92	92	92	92	92	92
Haefling 1-3	36	36	36	36	36	36	36	36	36	36	36	36	36	36	36
Mill Creek 1	300	300	300	300	300	300	300	300	300	300	300	300	300	300	300
Mill Creek 2	297	297	297	297	297	297	297	297	297	297	297	297	297	297	297
Mill Creek 3	385	385	385	385	385	385	385	385	385	385	385	385	385	385	385
Mill Creek 4	467	467	467	467	467	467	467	467	467	467	467	467	467	467	467
OVEC	152	152	152	152	152	152	152	152	152	152	152	152	152	152	152
Paddy's Run 11	12	12	12	12	12	12	12	12	12	12	12	12	12	12	12
Paddy's Run 12	23	23	23	23	23	23	23	23	23	23	23	23	23	23	23
Paddy's Run 13	158	158	158	158	158	158	158	158	158	158	158	158	158	158	158
Trimble County 5	160	160	160	160	160	160	160	160	160	160	160	160	160	160	160
Trimble County 6	160	160	160	160	160	160	160	160	160	160	160	160	160	160	160
Trimble County 7	160	160	160	160	160	160	160	160	160	160	160	160	160	160	160
Trimble County 8	160	160	160	160	160	160	160	160	160	160	160	160	160	160	160
Trimble County 9	160	160	160	160	160	160	160	160	160	160	160	160	160	160	160
Trimble County 10	160	160	160	160	160	160	160	160	160	160	160	160	160	160	160
Trimble County 1 (75%)	379	379	379	379	379	379	379	379	379	379	379	379	379	379	379
Trimble County 2 (75%)	549	549	549	549	549	549	549	549	549	549	549	549	549	549	549
Tyrone 3	69	69	69	69	69	69	69	69	69	69	69	69	69	69	69
Zorn 1	14	14	14	14	14	14	14	14	14	14	14	14	14	14	14
Ohio Falls 1-8	64	64	64	64	64	64	64	64	64	64	64	64	64	64	64
Dix Dam 1-3	30	30	30	30	30	30	30	30	30	30	30	30	30	30	30

Average Heat Rate at Maximum (MBtu/MWh)

	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025
Brown 1	11.17	11.17	11.17	11.17	11.17	11.17	11.17	11.17	11.17	11.17	11.17	11.17	11.17	11.17	11.17
Brown 2	10.24	10.24	10.24	10.24	10.24	10.24	10.24	10.24	10.24	10.24	10.24	10.24	10.24	10.24	10.24
Brown 3	10.38	10.38	10.38	10.38	10.38	10.38	10.38	10.38	10.38	10.38	10.38	10.38	10.38	10.38	10.38
Brown 5	12.59	12.59	12.59	12.59	12.59	12.59	12.59	12.59	12.59	12.59	12.59	12.59	12.59	12.59	12.59
Brown 6	13.43	13.43	13.43	13.43	13.43	13.43	13.43	13.43	13.43	13.43	13.43	13.43	13.43	13.43	13.43
Brown 7	13.43	13.43	13.43	13.43	13.43	13.43	13.43	13.43	13.43	13.43	13.43	13.43	13.43	13.43	13.43
Brown 8	13.26	13.26	13.26	13.26	13.26	13.26	13.26	13.26	13.26	13.26	13.26	13.26	13.26	13.26	13.26
Brown 9	13.26	13.26	13.26	13.26	13.26	13.26	13.26	13.26	13.26	13.26	13.26	13.26	13.26	13.26	13.26
Brown 10	13.26	13.26	13.26	13.26	13.26	13.26	13.26	13.26	13.26	13.26	13.26	13.26	13.26	13.26	13.26
Brown 11	13.26	13.26	13.26	13.26	13.26	13.26	13.26	13.26	13.26	13.26	13.26	13.26	13.26	13.26	13.26
Cane Run 4	10.89	10.89	10.89	10.89	10.89	10.89	10.89	10.89	10.89	10.89	10.89	10.89	10.89	10.89	10.89
Cane Run 5	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67
Cane Run 6	10.28	10.28	10.28	10.28	10.28	10.28	10.28	10.28	10.28	10.28	10.28	10.28	10.28	10.28	10.28
Cane Run 11	16.12	16.12	16.12	16.12	16.12	16.12	16.12	16.12	16.12	16.12	16.12	16.12	16.12	16.12	16.12
Ghent 1	10.72	10.72	10.72	10.72	10.72	10.72	10.72	10.72	10.72	10.72	10.72	10.72	10.72	10.72	10.72
Ghent 2	10.01	10.01	10.01	10.01	10.01	10.01	10.01	10.01	10.01	10.01	10.01	10.01	10.01	10.01	10.01
Ghent 3	11.09	11.09	11.09	11.09	11.09	11.09	11.09	11.09	11.09	11.09	11.09	11.09	11.09	11.09	11.09
Ghent 4	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67
Green River 3	13.36	13.36	13.36	13.36	13.36	13.36	13.36	13.36	13.36	13.36	13.36	13.36	13.36	13.36	13.36
Green River 4	11.52	11.52	11.52	11.52	11.52	11.52	11.52	11.52	11.52	11.52	11.52	11.52	11.52	11.52	11.52
Haefling 1-3	18.00	18.00	18.00	18.00	18.00	18.00	18.00	18.00	18.00	18.00	18.00	18.00	18.00	18.00	18.00
Mill Creek 1	10.58	10.58	10.58	10.58	10.58	10.58	10.58	10.58	10.58	10.58	10.58	10.58	10.58	10.58	10.58
Mill Creek 2	10.90	10.90	10.90	10.90	10.90	10.90	10.90	10.90	10.90	10.90	10.90	10.90	10.90	10.90	10.90
Mill Creek 3	10.64	10.64	10.64	10.64	10.64	10.64	10.64	10.64	10.64	10.64	10.64	10.64	10.64	10.64	10.64
Mill Creek 4	10.82	10.82	10.82	10.82	10.82	10.82	10.82	10.82	10.82	10.82	10.82	10.82	10.82	10.82	10.82
OVEC	10.00	10.00	10.00	10.00	10.00	10.00	10.00	10.00	10.00	10.00	10.00	10.00	10.00	10.00	10.00
Paddy's Run 11	15.48	15.48	15.48	15.48	15.48	15.48	15.48	15.48	15.48	15.48	15.48	15.48	15.48	15.48	15.48
Paddy's Run 12	17.01	17.01	17.01	17.01	17.01	17.01	17.01	17.01	17.01	17.01	17.01	17.01	17.01	17.01	17.01
Paddy's Run 13	10.31	10.31	10.31	10.31	10.31	10.31	10.31	10.31	10.31	10.31	10.31	10.31	10.31	10.31	10.31
Trimble County 5	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67
Trimble County 6	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67
Trimble County 7	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67
Trimble County 8	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67
Trimble County 9	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67
Trimble County 10	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67
Trimble County 1 (75%)	10.27	10.27	10.27	10.27	10.27	10.27	10.27	10.27	10.27	10.27	10.27	10.27	10.27	10.27	10.27
Trimble County 2 (75%)	8.87	8.87	8.87	8.87	8.87	8.87	8.87	8.87	8.87	8.87	8.87	8.87	8.87	8.87	8.87
Tyrone 3	13.12	13.12	13.12	13.12	13.12	13.12	13.12	13.12	13.12	13.12	13.12	13.12	13.12	13.12	13.12
Zorn 1	18.68	18.68	18.68	18.68	18.68	18.68	18.68	18.68	18.68	18.68	18.68	18.68	18.68	18.68	18.68

Average Heat Rate at Maximum (MBtu/MWh)

Brown 1	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040
Brown 2	11.17	11.17	11.17	11.17	11.17	11.17	11.17	11.17	11.17	11.17	11.17	11.17	11.17	11.17	11.85
Brown 3	10.24	10.24	10.24	10.24	10.24	10.24	10.24	10.24	10.24	10.24	10.24	10.24	10.24	10.24	10.45
Brown 5	10.38	10.38	10.38	10.38	10.38	10.38	10.38	10.38	10.38	10.38	10.38	10.38	10.38	10.38	10.99
Brown 6	12.59	12.59	12.59	12.59	12.59	12.59	12.59	12.59	12.59	12.59	12.59	12.59	12.59	12.59	12.59
Brown 7	13.43	13.43	13.43	13.43	13.43	13.43	13.43	13.43	13.43	13.43	13.43	13.43	13.43	13.43	12.04
Brown 8	13.43	13.43	13.43	13.43	13.43	13.43	13.43	13.43	13.43	13.43	13.43	13.43	13.43	13.43	12.04
Brown 9	13.26	13.26	13.26	13.26	13.26	13.26	13.26	13.26	13.26	13.26	13.26	13.26	13.26	13.26	12.11
Brown 10	13.26	13.26	13.26	13.26	13.26	13.26	13.26	13.26	13.26	13.26	13.26	13.26	13.26	13.26	12.11
Brown 11	13.26	13.26	13.26	13.26	13.26	13.26	13.26	13.26	13.26	13.26	13.26	13.26	13.26	13.26	12.11
Cane Run 4	10.89	10.89	10.89	10.89	10.89	10.89	10.89	10.89	10.89	10.89	10.89	10.89	10.89	10.89	10.48
Cane Run 5	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.60
Cane Run 6	10.28	10.28	10.28	10.28	10.28	10.28	10.28	10.28	10.28	10.28	10.28	10.28	10.28	10.28	10.28
Cane Run 11	16.12	16.12	16.12	16.12	16.12	16.12	16.12	16.12	16.12	16.12	16.12	16.12	16.12	16.12	16.12
Ghent 1	10.72	10.72	10.72	10.72	10.72	10.72	10.72	10.72	10.72	10.72	10.72	10.72	10.72	10.72	10.44
Ghent 2	10.01	10.01	10.01	10.01	10.01	10.01	10.01	10.01	10.01	10.01	10.01	10.01	10.01	10.01	9.98
Ghent 3	11.09	11.09	11.09	11.09	11.09	11.09	11.09	11.09	11.09	11.09	11.09	11.09	11.09	11.09	10.97
Ghent 4	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67
Green River 3	13.36	13.36	13.36	13.36	13.36	13.36	13.36	13.36	13.36	13.36	13.36	13.36	13.36	13.36	12.66
Green River 4	11.52	11.52	11.52	11.52	11.52	11.52	11.52	11.52	11.52	11.52	11.52	11.52	11.52	11.52	10.89
Haefling 1-3	18.00	18.00	18.00	18.00	18.00	18.00	18.00	18.00	18.00	18.00	18.00	18.00	18.00	18.00	18.00
Mill Creek 1	10.58	10.58	10.58	10.58	10.58	10.58	10.58	10.58	10.58	10.58	10.58	10.58	10.58	10.58	10.50
Mill Creek 2	10.90	10.90	10.90	10.90	10.90	10.90	10.90	10.90	10.90	10.90	10.90	10.90	10.90	10.90	10.61
Mill Creek 3	10.64	10.64	10.64	10.64	10.64	10.64	10.64	10.64	10.64	10.64	10.64	10.64	10.64	10.64	10.45
Mill Creek 4	10.82	10.82	10.82	10.82	10.82	10.82	10.82	10.82	10.82	10.82	10.82	10.82	10.82	10.82	10.30
OVEC	10.00	10.00	10.00	10.00	10.00	10.00	10.00	10.00	10.00	10.00	10.00	10.00	10.00	10.00	10.00
Paddy's Run 11	15.48	15.48	15.48	15.48	15.48	15.48	15.48	15.48	15.48	15.48	15.48	15.48	15.48	15.48	15.48
Paddy's Run 12	17.01	17.01	17.01	17.01	17.01	17.01	17.01	17.01	17.01	17.01	17.01	17.01	17.01	17.01	17.01
Paddy's Run 13	10.31	10.31	10.31	10.31	10.31	10.31	10.31	10.31	10.31	10.31	10.31	10.31	10.31	10.31	10.31
Trimble County 5	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.07
Trimble County 6	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.07
Trimble County 7	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.07
Trimble County 8	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.07
Trimble County 9	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.07
Trimble County 10	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.67	10.07
Trimble County 1 (75%)	10.27	10.27	10.27	10.27	10.27	10.27	10.27	10.27	10.27	10.27	10.27	10.27	10.27	10.27	10.20
Trimble County 2 (75%)	8.87	8.87	8.87	8.87	8.87	8.87	8.87	8.87	8.87	8.87	8.87	8.87	8.87	8.87	8.87
Tyrone 3	13.12	13.12	13.12	13.12	13.12	13.12	13.12	13.12	13.12	13.12	13.12	13.12	13.12	13.12	12.56
Zorn 1	18.68	18.68	18.68	18.68	18.68	18.68	18.68	18.68	18.68	18.68	18.68	18.68	18.68	18.68	18.68

Planned Maintenance (Weeks/Year)

	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025
Brown 1	2	3	1	8	1	3	1	3	1	3	8	3	1	3	1
Brown 2	5	1	3	4	1	8	1	3	1	3	1	3	8	1	3
Brown 3	3	8	1	3	4	3	1	3	8	3	1	3	1	3	1
Brown 5	0	2	0	2	0	0	0	0	0	8	0	0	0	0	0
Brown 6	1	1	1	2	1	1	8	1	1	2	0	0	0	0	0
Brown 7	2	1	1	2	1	2	1	8	1	1	0	0	0	0	0
Brown 8	0	1	2	0	2	0	0	0	2	0	0	0	0	0	0
Brown 9	2	1	8	0	2	0	0	0	2	0	0	0	0	0	0
Brown 10	0	2	0	8	0	2	0	0	2	0	0	0	0	0	0
Brown 11	0	2	0	0	0	8	0	0	0	0	0	0	0	0	0
Cane Run 4	1	8	0	3	0	0	0	0	0	0	0	0	0	0	0
Cane Run 5	3	0	3	0	0	0	0	0	0	0	0	0	0	0	0
Cane Run 6	0	3	0	3	0	0	0	0	0	0	0	0	0	0	0
Cane Run 11															
Ghent 1	2	3	1	9	1	4	1	4	1	3	8	1	3	1	3
Ghent 2	2	9	1	4	2	4	2	1	9	1	3	1	3	1	3
Ghent 3	9	3	6	1	5	1	3	8	4	1	3	1	3	1	8
Ghent 4	1	3	1	6	8	3	1	4	1	3	1	8	1	3	1
Green River 3	1	3	1	3	1	0	0	0	0	0	0	0	0	0	0
Green River 4	4	1	3	1	3	0	0	0	0	0	0	0	0	0	0
Haefling 1-3															
Mill Creek 1	2	2	8	1	6	1	4	1	4	1	8	1	4	1	4
Mill Creek 2	1	8	1	4	6	4	1	4	1	8	1	4	1	4	1
Mill Creek 3	14	2	6	1	6	1	4	1	8	1	4	1	4	1	4
Mill Creek 4	2	4	2	8	1	4	1	4	1	4	1	8	1	4	1
OVEC															
Paddy's Run 11															
Paddy's Run 12															
Paddy's Run 13	15	1	1	1	1	1	1	16	1	1	1	0	0	0	0
Trimble County 5	9	0	0	0	0	0	8	0	0	0	0	0	0	0	0
Trimble County 6	0	0	0	0	0	8	0	0	0	0	0	0	0	0	0
Trimble County 7	0	8	0	0	0	0	0	8	0	0	0	0	0	0	0
Trimble County 8	8	0	0	0	0	0	8	0	0	0	0	0	0	0	0
Trimble County 9	0	8	0	0	0	0	0	8	0	0	0	0	0	0	0
Trimble County 10	0	0	8	0	0	0	0	0	8	0	0	0	0	0	0
Trimble County 1 (75%)	6	0	4	0	4	0	8	0	4	0	4	0	4	0	8
Trimble County 2 (75%)	4	4	0	4	0	4	0	8	0	4	0	4	0	4	0
Tyrone 3															
Zorn 1															

Planned Maintenance (Weeks/Year)

	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040
Brown 1	3	1	8	1	3	1	3	1	3	8	3	1	3	1	3
Brown 2	1	3	1	3	8	1	3	1	3	1	3	8	1	3	1
Brown 3	8	1	3	1	3	1	3	8	3	1	3	1	3	1	8
Brown 5	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Brown 6	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Brown 7	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Brown 8	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Brown 9	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Brown 10	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Brown 11	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Cane Run 4	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Cane Run 5	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Cane Run 6	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Cane Run 11	1	3	8	1	3	1	3	1	3	8	1	3	1	3	1
Ghent 1	8	1	3	1	3	1	3	8	1	3	1	3	1	3	8
Ghent 2	3	1	3	1	3	1	3	3	1	3	1	3	1	3	3
Ghent 3	3	1	3	1	3	1	3	3	1	3	1	3	1	3	3
Ghent 4	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Green River 3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Green River 4	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Haefling 1-3	1	4	1	8	1	4	1	4	1	4	1	8	1	4	1
Mill Creek 1	4	1	8	1	4	1	4	1	4	1	8	1	4	1	4
Mill Creek 2	1	8	1	4	1	4	1	4	1	8	1	4	1	4	1
Mill Creek 3	4	1	4	1	8	1	4	1	4	1	4	1	4	1	4
Mill Creek 4	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
OVEC															
Paddy's Run 11															
Paddy's Run 12															
Paddy's Run 13															
Trimble County 5	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Trimble County 6	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Trimble County 7	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Trimble County 8	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Trimble County 9	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Trimble County 10	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Trimble County 1 (75%)	0	4	0	4	0	4	0	8	0	4	0	4	0	4	0
Trimble County 2 (75%)	8	0	4	0	4	0	4	0	8	0	4	0	4	0	4
Tyrone 3															
Zorn 1															

Forced Outage Rate (%)

	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025
Brown 1	8.2	8.2	8.2	8.2	8.2	8.2	8.2	8.2	8.2	8.2	8.2	8.2	8.2	8.2	8.2
Brown 2	8.2	8.2	8.2	8.2	8.2	8.2	8.2	8.2	8.2	8.2	8.2	8.2	8.2	8.2	8.2
Brown 3	7.3	7.3	7.3	7.3	7.3	7.3	7.3	7.3	7.3	7.3	7.3	7.3	7.3	7.3	7.3
Brown 5	12.4	12.4	12.4	12.4	12.4	12.4	12.4	12.4	12.4	12.4	12.4	12.4	12.4	12.4	12.4
Brown 6	6.8	6.8	6.8	6.8	6.8	6.8	6.8	6.8	6.8	6.8	6.8	6.8	6.8	6.8	6.8
Brown 7	6.8	6.8	6.8	6.8	6.8	6.8	6.8	6.8	6.8	6.8	6.8	6.8	6.8	6.8	6.8
Brown 8	7.8	7.8	7.8	7.8	7.8	7.8	7.8	7.8	7.8	7.8	7.8	7.8	7.8	7.8	7.8
Brown 9	7.8	7.8	7.8	7.8	7.8	7.8	7.8	7.8	7.8	7.8	7.8	7.8	7.8	7.8	7.8
Brown 10	7.8	7.8	7.8	7.8	7.8	7.8	7.8	7.8	7.8	7.8	7.8	7.8	7.8	7.8	7.8
Brown 11	7.8	7.8	7.8	7.8	7.8	7.8	7.8	7.8	7.8	7.8	7.8	7.8	7.8	7.8	7.8
Cane Run 4	8.2	8.5	8.8	8.8	8.8	8.8	8.8	8.8	8.8	8.8	8.8	8.8	8.8	8.8	8.8
Cane Run 5	8.2	8.5	8.8	8.8	8.8	8.8	8.8	8.8	8.8	8.8	8.8	8.8	8.8	8.8	8.8
Cane Run 6	7.3	7.6	7.9	7.9	7.9	7.9	7.9	7.9	7.9	7.9	7.9	7.9	7.9	7.9	7.9
Cane Run 11	50.0	50.0	50.0	50.0	50.0	50.0	50.0	50.0	50.0	50.0	50.0	50.0	50.0	50.0	50.0
Ghent 1	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7
Ghent 2	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7
Ghent 3	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7
Ghent 4	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7
Green River 3	9.6	9.6	9.6	9.6	9.6	9.6	9.6	9.6	9.6	9.6	9.6	9.6	9.6	9.6	9.6
Green River 4	9.6	9.6	9.6	9.6	9.6	9.6	9.6	9.6	9.6	9.6	9.6	9.6	9.6	9.6	9.6
Haefling 1-3	50.0	50.0	50.0	50.0	50.0	50.0	50.0	50.0	50.0	50.0	50.0	50.0	50.0	50.0	50.0
Mill Creek 1	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7
Mill Creek 2	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7
Mill Creek 3	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7
Mill Creek 4	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7
OVEC	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Paddy's Run 11	50.0	50.0	50.0	50.0	50.0	50.0	50.0	50.0	50.0	50.0	50.0	50.0	50.0	50.0	50.0
Paddy's Run 12	50.0	50.0	50.0	50.0	50.0	50.0	50.0	50.0	50.0	50.0	50.0	50.0	50.0	50.0	50.0
Paddy's Run 13	8.7	8.7	8.7	8.7	8.7	8.7	8.7	8.7	8.7	8.7	8.7	8.7	8.7	8.7	8.7
Trimble County 5	4.6	4.6	4.6	4.6	4.6	4.6	4.6	4.6	4.6	4.6	4.6	4.6	4.6	4.6	4.6
Trimble County 6	4.6	4.6	4.6	4.6	4.6	4.6	4.6	4.6	4.6	4.6	4.6	4.6	4.6	4.6	4.6
Trimble County 7	4.6	4.6	4.6	4.6	4.6	4.6	4.6	4.6	4.6	4.6	4.6	4.6	4.6	4.6	4.6
Trimble County 8	4.6	4.6	4.6	4.6	4.6	4.6	4.6	4.6	4.6	4.6	4.6	4.6	4.6	4.6	4.6
Trimble County 9	4.6	4.6	4.6	4.6	4.6	4.6	4.6	4.6	4.6	4.6	4.6	4.6	4.6	4.6	4.6
Trimble County 10	4.6	4.6	4.6	4.6	4.6	4.6	4.6	4.6	4.6	4.6	4.6	4.6	4.6	4.6	4.6
Trimble County 1 (75%)	4.9	4.9	4.9	4.9	4.9	4.9	4.9	4.9	4.9	4.9	4.9	4.9	4.9	4.9	4.9
Trimble County 2 (75%)	9.0	7.5	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7
Tyrone 3	8.7	8.7	8.7	8.7	8.7	8.7	8.7	8.7	8.7	8.7	8.7	8.7	8.7	8.7	8.7
Zorn 1	50.0	50.0	50.0	50.0	50.0	50.0	50.0	50.0	50.0	50.0	50.0	50.0	50.0	50.0	50.0

Forced Outage Rate (%)

	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040
Brown 1	8.2	8.2	8.2	8.2	8.2	8.2	8.2	8.2	8.2	8.2	8.2	8.2	8.2	8.2	8.2
Brown 2	8.2	8.2	8.2	8.2	8.2	8.2	8.2	8.2	8.2	8.2	8.2	8.2	8.2	8.2	8.2
Brown 3	7.3	7.3	7.3	7.3	7.3	7.3	7.3	7.3	7.3	7.3	7.3	7.3	7.3	7.3	7.3
Brown 5	12.4	12.4	12.4	12.4	12.4	12.4	12.4	12.4	12.4	12.4	12.4	12.4	12.4	12.4	12.4
Brown 6	6.8	6.8	6.8	6.8	6.8	6.8	6.8	6.8	6.8	6.8	6.8	6.8	6.8	6.8	6.8
Brown 7	6.8	6.8	6.8	6.8	6.8	6.8	6.8	6.8	6.8	6.8	6.8	6.8	6.8	6.8	6.8
Brown 8	7.8	7.8	7.8	7.8	7.8	7.8	7.8	7.8	7.8	7.8	7.8	7.8	7.8	7.8	7.8
Brown 9	7.8	7.8	7.8	7.8	7.8	7.8	7.8	7.8	7.8	7.8	7.8	7.8	7.8	7.8	7.8
Brown 10	7.8	7.8	7.8	7.8	7.8	7.8	7.8	7.8	7.8	7.8	7.8	7.8	7.8	7.8	7.8
Brown 11	7.8	7.8	7.8	7.8	7.8	7.8	7.8	7.8	7.8	7.8	7.8	7.8	7.8	7.8	7.8
Cane Run 4	8.8	8.8	8.8	8.8	8.8	8.8	8.8	8.8	8.8	8.8	8.8	8.8	8.8	8.8	8.8
Cane Run 5	8.8	8.8	8.8	8.8	8.8	8.8	8.8	8.8	8.8	8.8	8.8	8.8	8.8	8.8	8.8
Cane Run 6	7.9	7.9	7.9	7.9	7.9	7.9	7.9	7.9	7.9	7.9	7.9	7.9	7.9	7.9	7.9
Cane Run 11	50.0	50.0	50.0	50.0	50.0	50.0	50.0	50.0	50.0	50.0	50.0	50.0	50.0	50.0	50.0
Ghent 1	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7
Ghent 2	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7
Ghent 3	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7
Ghent 4	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7
Green River 3	9.6	9.6	9.6	9.6	9.6	9.6	9.6	9.6	9.6	9.6	9.6	9.6	9.6	9.6	9.6
Green River 4	9.6	9.6	9.6	9.6	9.6	9.6	9.6	9.6	9.6	9.6	9.6	9.6	9.6	9.6	9.6
Haefling 1-3	50.0	50.0	50.0	50.0	50.0	50.0	50.0	50.0	50.0	50.0	50.0	50.0	50.0	50.0	50.0
Mill Creek 1	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7
Mill Creek 2	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7
Mill Creek 3	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7
Mill Creek 4	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7
OVEC	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Paddy's Run 11	50.0	50.0	50.0	50.0	50.0	50.0	50.0	50.0	50.0	50.0	50.0	50.0	50.0	50.0	50.0
Paddy's Run 12	50.0	50.0	50.0	50.0	50.0	50.0	50.0	50.0	50.0	50.0	50.0	50.0	50.0	50.0	50.0
Paddy's Run 13	8.7	8.7	8.7	8.7	8.7	8.7	8.7	8.7	8.7	8.7	8.7	8.7	8.7	8.7	8.7
Trimble County 5	4.6	4.6	4.6	4.6	4.6	4.6	4.6	4.6	4.6	4.6	4.6	4.6	4.6	4.6	4.6
Trimble County 6	4.6	4.6	4.6	4.6	4.6	4.6	4.6	4.6	4.6	4.6	4.6	4.6	4.6	4.6	4.6
Trimble County 7	4.6	4.6	4.6	4.6	4.6	4.6	4.6	4.6	4.6	4.6	4.6	4.6	4.6	4.6	4.6
Trimble County 8	4.6	4.6	4.6	4.6	4.6	4.6	4.6	4.6	4.6	4.6	4.6	4.6	4.6	4.6	4.6
Trimble County 9	4.6	4.6	4.6	4.6	4.6	4.6	4.6	4.6	4.6	4.6	4.6	4.6	4.6	4.6	4.6
Trimble County 10	4.6	4.6	4.6	4.6	4.6	4.6	4.6	4.6	4.6	4.6	4.6	4.6	4.6	4.6	4.6
Trimble County 1 (75%)	4.9	4.9	4.9	4.9	4.9	4.9	4.9	4.9	4.9	4.9	4.9	4.9	4.9	4.9	4.9
Trimble County 2 (75%)	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7
Tyrone 3	8.7	8.7	8.7	8.7	8.7	8.7	8.7	8.7	8.7	8.7	8.7	8.7	8.7	8.7	8.7
Zorn 1	50.0	50.0	50.0	50.0	50.0	50.0	50.0	50.0	50.0	50.0	50.0	50.0	50.0	50.0	50.0

CONFIDENTIAL INFORMATION REDACTED

Consumable Variable O&M for Existing and Potential Controls (\$/MWh)

	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025
Brown 1															
Brown 2															
Brown 3															
Brown 5															
Brown 6															
Brown 7															
Brown 8															
Brown 9															
Brown 10															
Brown 11															
Cane Run 4															
Cane Run 5															
Cane Run 6															
Cane Run 11															
Ghent 1															
Ghent 2															
Ghent 3															
Ghent 4															
Green River 3															
Green River 4															
Haefling 1-3															
Mill Creek 1															
Mill Creek 2															
Mill Creek 3															
Mill Creek 4															
OVEC															
Paddy's Run 11															
Paddy's Run 12															
Paddy's Run 13															
Trimble County 5															
Trimble County 6															
Trimble County 7															
Trimble County 8															
Trimble County 9															
Trimble County 10															
Trimble County 1 (75%)															
Trimble County 2 (75%)															
Tyrone 3															
Zorn 1															

CONFIDENTIAL INFORMATION REDACTED

Consumable Variable O&M for Existing and Potential Controls (\$/MWh)

	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040
Brown 1															
Brown 2															
Brown 3															
Brown 5															
Brown 6															
Brown 7															
Brown 8															
Brown 9															
Brown 10															
Brown 11															
Cane Run 4															
Cane Run 5															
Cane Run 6															
Cane Run 11															
Ghent 1															
Ghent 2															
Ghent 3															
Ghent 4															
Green River 3															
Green River 4															
Haefling 1-3															
Mill Creek 1															
Mill Creek 2															
Mill Creek 3															
Mill Creek 4															
OVEC															
Paddy's Run 11															
Paddy's Run 12															
Paddy's Run 13															
Trimble County 5															
Trimble County 6															
Trimble County 7															
Trimble County 8															
Trimble County 9															
Trimble County 10															
Trimble County 1 (75%)															
Trimble County 2 (75%)															
Tyrone 3															
Zorn 1															

Emissions Allowances (\$/ton emitted)

	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025
NOx, Annual	340	100	50	0	0	0	0	0	0	0	0	0	0	0	0
NOx, Seasonal	30	0	0	0	0	0	0	0	0	0	0	0	0	0	0
SO2	30	10	10	0	0	0	0	0	0	0	0	0	0	0	0

Emissions Allowances (\$/ton emitted)

	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040
NOx, Annual	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
NOx, Seasonal	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
SO2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

Electricity Prices (\$/MWh)	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025
Peak (5x16)	43.88	45.20	47.09	50.34	54.14	58.04	69.70	75.69	80.62	82.17	81.89	81.37	81.85	84.59	87.65
Off-Peak (7x8)	28.25	29.19	30.94	29.82	30.45	31.08	47.97	49.04	48.87	50.22	50.99	50.40	52.61	55.49	56.71
Weekend (2x16)	38.58	40.08	43.22	40.94	39.57	38.40	57.47	60.66	62.37	63.68	63.73	62.87	65.31	67.50	70.21
Around the Clock	37.65	38.89	40.97	41.71	43.48	45.30	60.11	63.95	66.57	68.02	68.14	67.50	68.93	71.66	74.02

1.74% Annual escalation rate beyond 2035

Electricity Prices (\$/MWh)

	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040
Peak (5x16)	87.00	85.59	84.22	84.60	86.50	93.83	98.84	98.23	96.60	94.98	96.63	98.32	100.03	101.77	103.54
Off-Peak (7x8)	57.70	58.70	59.81	60.77	61.83	62.90	64.03	65.12	66.26	67.41	68.58	69.77	70.99	72.22	73.48
Weekend (2x16)	76.89	85.58	94.01	98.60	99.24	86.35	79.20	86.71	96.50	106.45	108.31	110.19	112.11	114.06	116.04
Around the Clock	75.31	76.62	77.97	79.32	80.70	82.10	83.51	84.99	86.47	87.97	89.50	91.06	92.64	94.25	95.89

1.74% Annual escalation r

LOUISVILLE GAS AND ELECTRIC COMPANY

Response to Commission Staff's First Information Request Dated July 12, 2011

Case No. 2011-00162

Question No. 47

Witness: Charles R. Schram

Q-47. Refer to Schram Testimony, Exhibit CRS-1, Appendix 6.1. The Exhibit provides the analysis assumptions. For each of the Financial Assumptions provide all documentation and calculations relied on to support those assumptions.

A-47. Please see the response to Question No. 21.

LOUISVILLE GAS AND ELECTRIC COMPANY

Response to Commission Staff's First Information Request Dated July 12, 2011

Case No. 2011-00162

Question No. 48

Witness: Robert M. Conroy / Shannon L. Charnas

Q-48. Refer to Charnas Testimony. At this time, have any costs been incurred for Projects 26 and/or 27? If so, what are those amounts by project and have any of those expenditures been previously recovered through base rates?

A-48. As of June 30, 2011, total capital expenditures incurred for the proposed Project 26 are \$88,296. The capital expenditures related to the proposed Project 26 have not previously been recovered in base rates.

There have been no costs incurred at this time related to the proposed Project 27.

LOUISVILLE GAS AND ELECTRIC COMPANY

Response to Commission Staff's First Information Request Dated July 12, 2011

Case No. 2011-00162

Question No. 49

Witness: Robert M. Conroy

- Q-49. Refer to Conroy Testimony at page 8. Mr. Conroy provides a table titled Environmental Cost Recovery Surcharge Summary. Provide copies of all documents and data inputs used to make the computations included in this table. Also provide these computations in an electronic spreadsheet with formulas included.
- A-49. The table contained on page 8 of Conroy Testimony is a summary of the information contained in Exhibit RMC-5. Please see the attached. An electronic version of the computations for the requested table and Exhibit RMC-5 is being provided on the attached CD in folder titled Question 49.

**Louisville Gas and Electric Company
 Environmental Cost Recovery Surcharge Summary**

	2012	2013	2014	2015	2016
Total E(m) - (\$000)	\$25,243	\$76,600	\$127,031	\$218,209	\$248,966
12 Month Average Jurisdictional Ratio	87.20%	87.20%	87.20%	87.20%	87.20%
Jurisdictional E(m) - (\$000)	\$22,012	\$66,797	\$110,774	\$190,284	\$217,105
Forecasted Jurisdictional R(m) - (million)	\$956	\$1,013	\$1,038	\$1,077	\$1,131
Incremental Billing Factor	2.30%	6.60%	10.67%	17.67%	19.20%
Residential Customer Impact					
Monthly bill (1,000 kWh per month)	\$1.96	\$5.61	\$9.08	\$15.03	\$16.33

Kentucky Utilities Company
Environmental Cost Recovery Surcharge Summary

	2012	2013	2014	2015	2016
Total E(m) - (\$000)	\$22,998	\$69,805	\$143,788	\$199,867	\$232,668
12 Month Average Jurisdictional Ratio	86.99%	86.99%	86.99%	86.99%	86.99%
Jurisdictional E(m) - (\$000)	\$20,005	\$60,722	\$125,079	\$173,861	\$202,394
Forecasted Jurisdictional R(m) - (million)	\$1,365	\$1,442	\$1,505	\$1,560	\$1,655
Incremental Billing Factor	1.47%	4.21%	8.31%	11.15%	12.23%
Residential Customer Impact					
Monthly bill (1,000 kWh per month)	\$1.13	\$3.26	\$6.43	\$8.63	\$9.46

State	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
Tax Rate	35.71%	35.71%	35.71%	35.71%	35.71%	35.71%	35.71%	35.71%	35.71%	35.71%
LORE	35.7100%	35.7100%	35.7100%	35.7100%	35.7100%	35.7100%	35.7100%	35.7100%	35.7100%	35.7100%
Property Tax Rate	0.15%	0.15%	0.15%	0.15%	0.15%	0.15%	0.15%	0.15%	0.15%	0.15%

LG&E Rate of Return Calculation
August 31, 2010

(Source: capital structure used in most recent ECR review case 2010-00475)

Total Company	2011 Weighted Cost of Capital	2012 Weighted Cost of Capital	2013 Weighted Cost of Capital	2014 Weighted Cost of Capital	2015 Weighted Cost of Capital	2016 Weighted Cost of Capital	2017 Weighted Cost of Capital	2018 Weighted Cost of Capital	2019 Weighted Cost of Capital	2020 Weighted Cost of Capital
Long-Term Debt	72,813,150	36.65%	2.00%	2.00%	2.00%	2.00%	2.00%	2.00%	2.00%	2.00%
Short-Term Debt	35,554,248	5.10%	0.01%	0.01%	0.01%	0.01%	0.01%	0.01%	0.01%	-0.01%
Preferred Stock	0	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Common Equity	1,387,422,243	56.25%	7.99%	5.98%	5.98%	5.98%	5.98%	5.98%	5.98%	5.98%
Total	1,872,869,691		2.01%	2.01%	2.01%	2.01%	2.01%	2.01%	2.01%	2.01%
Composite Debt Rate			35.71%	35.71%	35.71%	35.71%	35.71%	35.71%	35.71%	35.71%
Composite Tax Rate			11.31%	11.31%	11.31%	11.31%	11.31%	11.31%	11.31%	11.31%
Overall Rate of Return Grossed Up			11.31%	11.31%	11.31%	11.31%	11.31%	11.31%	11.31%	11.31%

KU Rate of Return Calculation
August 31, 2010

(Source: capital structure used in most recent ECR review case 2010-00474)

Total Company	2011 Weighted Cost of Capital	2012 Weighted Cost of Capital	2013 Weighted Cost of Capital	2014 Weighted Cost of Capital	2015 Weighted Cost of Capital	2016 Weighted Cost of Capital	2017 Weighted Cost of Capital	2018 Weighted Cost of Capital	2019 Weighted Cost of Capital	2020 Weighted Cost of Capital
Long-Term Debt	1,142,265,316	44.25%	2.08%	2.08%	2.08%	2.08%	2.08%	2.08%	2.08%	2.08%
Short-Term Debt	40,342,258	1.59%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Preferred Stock	0	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Common Equity	1,784,187,516	54.17%	5.76%	5.76%	5.76%	5.76%	5.76%	5.76%	5.76%	5.76%
Total	3,146,123,044		2.08%	2.08%	2.08%	2.08%	2.08%	2.08%	2.08%	2.08%
Composite Debt Rate			35.71%	35.71%	35.71%	35.71%	35.71%	35.71%	35.71%	35.71%
Composite Tax Rate			11.04%	11.04%	11.04%	11.04%	11.04%	11.04%	11.04%	11.04%
Overall Rate of Return Grossed Up			11.04%	11.04%	11.04%	11.04%	11.04%	11.04%	11.04%	11.04%

Jurisdictional Ratios from ECR Filings

Billing Month	LG&E	KU
Mar-10	86.20%	84.36%
Apr-10	80.37%	81.71%
May-10	86.90%	83.28%
Jun-10	84.15%	87.37%
Jul-10	85.38%	86.58%
Aug-10	93.53%	86.14%
Sep-10	92.28%	86.06%
Oct-10	92.56%	87.68%
Nov-10	90.69%	88.85%
Dec-10	85.51%	90.77%
Jan-11	83.47%	88.01%
Feb-11	83.46%	86.99%
Average	87.20%	86.96%

12/1/2010 Expense Month Avg Mth Units Rev

695,629,356 1,251,944,184

Revenue Calculations Percentage Change

	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
LG&E	612,399,201	616,453,124	661,866,884	674,166,038	706,062,084	731,555,020	793,375,938	810,538,275	848,006,746	871,350,286
Non-Fuel Base Revenues	352,871,140	354,605,595	358,654,116	359,061,715	360,515,941	363,215,132	365,505,598	368,836,102	373,316,507	377,899,218
Base Fuel Revenues	6,569,307	52,094,215	65,106,490	71,573,661	76,932,645	99,476,590	101,719,476	119,181,391	136,745,475	144,911,542
FAC Revenues	8,488,276	24,911,936	67,205,086	182,489,410	273,508,372	314,131,086	319,850,631	314,016,635	303,107,092	290,546,494
Environmental Cost Recovery	25,020,225	31,753,935	29,101,484	33,668,359	33,435,195	36,698,749	34,810,786	37,017,622	34,610,250	36,819,727
Energy Efficient Operations Cost Recovery	886,759,953	955,916,819	1,012,746,964	1,038,491,023	1,076,945,865	1,130,945,501	1,189,411,289	1,235,773,390	1,294,678,978	1,331,079,773
Total (less ECR)	0.69597	0.69595	0.69542	0.69542	0.69703	0.695014	0.69700	0.69376	0.64695	0.62971
% Change		0.1293	0.1580	0.2309	0.2611	0.3330	0.3789	0.4415	0.4643	
KU	772,207,990	783,997,444	847,674,177	864,767,856	904,788,333	931,637,550	986,720,335	1,024,534,800	1,117,837,185	1,144,830,904
Non-Fuel Base Revenues	508,150,329	517,236,970	526,269,091	531,136,408	541,521,192	549,025,330	552,266,141	563,396,145	573,613,393	582,751,081
Base Fuel Revenues	16,174,164	32,016,696	35,196,813	73,393,620	78,267,833	135,900,479	142,822,427	194,547,422	236,117,586	251,130,956
FAC Revenues	64,844,127	85,000,705	129,933,711	177,716,989	238,127,822	332,468,292	397,541,383	386,104,421	273,917,972	257,929,664
Environmental Cost Recovery	23,709,208	31,463,979	30,165,987	34,916,610	35,013,260	38,155,163	36,382,406	36,652,897	36,187,617	36,500,851
Energy Efficient Operations Cost Recovery	1,202,241,691	1,384,724,869	1,442,296,065	1,505,216,494	1,559,990,578	1,654,718,522	1,721,201,709	1,811,331,354	1,963,765,781	2,028,216,792
Total (less ECR)	0.03370	0.03563	0.04053	0.04582	0.05100	0.06108	0.06418	0.05235	0.08428	0.03382
% Change		0.0924	0.1401	0.1813	0.2353	0.3037	0.3718	0.4674	0.5262	

portional Share TC Facilities Ash Pond & Lar

**Billing Factors as of
12/1/2010 Expense Month**

Customer/Charge	LG&E	KU
Energy	6.50	8.50
Energy	0.07068	0.06805
FAC	0.00241	(0.00160)
DSM	0.00350	0.00743
ECR Facility	0.01190	0.02550
Average	4.051300	

Utility LG&E KU 75% 52% 48% 39.000% 36.000%

Incremental O&M

	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
LG&E										
Project 2E										
MC Air Compliance (FGR/Bayhouse) - All Units	0	0	1,699,407	7,079,485	31,075,726	47,403,071	48,520,230	49,675,692	50,846,507	52,040,535
Project 2I										
TCI Air Compliance (Bayhouse)	0	0	0	0	3,733,365	7,614,074	7,769,305	7,811,631	8,060,064	8,241,665
Total-LG&E	0	0	1,699,407	7,079,485	35,609,091	55,017,095	56,294,535	57,597,323	58,906,571	60,282,200
KU										
Project 2A Amended										
BR Lineda (Phase 0)	0	0	0	2,413,772	2,898,105	2,895,131	3,074,605	3,166,025	3,261,930	3,359,791
Project 2A										
BR Air Compliance (Bayhouse) - All Units	0	0	0	7,536,179	16,368,110	19,005,000	19,487,621	19,856,973	20,254,113	20,659,195
Project 2B										
GV Air Compliance (Bayhouse) - All Units	0	8,692	8,229,481	29,081,610	41,520,865	64,806,127	66,102,250	67,424,295	68,772,781	70,149,237
Total-KU	0	8,692	8,229,481	35,411,561	60,770,160	85,877,161	89,644,525	90,449,193	92,288,928	94,167,222

Incremental O&M Estimates for Projects in the 2011 ECR Plan

Area below used as inputs into Project tabs

# Beneficial Reuse	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
Louisville Gas and Electric Company										
Proposed Project 26 MC Air Compliance - FGDs & Baghouses	\$ -	\$ -	\$ 1,693,407	\$ 7,079,485	\$ 31,875,726	\$ 47,403,071	\$ 48,528,230	\$ 49,675,892	\$ 50,846,507	\$ 52,040,535
Mill Creek 1 - Combined 1 & 2 FGD	\$ 0	\$ 0	\$ 0	\$ 0	(\$254,057)	(\$349,068)	(\$316,411)	(\$283,100)	(\$249,123)	(\$214,467)
Mill Creek 1 - Baghouse	\$ 0	\$ 0	\$ 0	\$ 0	\$ 5,298,902	\$ 9,156,028	\$ 9,339,149	\$ 9,525,932	\$ 9,716,451	\$ 9,910,780
Total Mill Creek 1	\$ 0	\$ 0	\$ 0	\$ 0	\$ 5,044,845	\$ 8,806,961	\$ 9,022,738	\$ 9,242,832	\$ 9,467,327	\$ 9,696,312
Mill Creek 2 - Combined 1 & 2 FGD	\$ 0	\$ 0	\$ 0	\$ 0	\$ 177,233	\$ 54,984	\$ 87,651	\$ 120,962	\$ 154,939	\$ 189,595
Mill Creek 2 - Baghouse	\$ 0	\$ 0	\$ 0	\$ 0	\$ 6,437,015	\$ 9,640,391	\$ 9,833,199	\$ 10,029,863	\$ 10,230,460	\$ 10,435,069
Total Mill Creek 2	\$ 0	\$ 0	\$ 0	\$ 0	\$ 6,454,247	\$ 9,695,385	\$ 9,920,850	\$ 10,150,825	\$ 10,385,398	\$ 10,624,664
Mill Creek 3 - FGD (U4 update and tie in)	\$ 0	\$ 0	\$ 0	(\$6,803)	\$ 211,745	\$ 270,192	\$ 329,808	\$ 390,615	\$ 452,639	\$ 515,904
Mill Creek 3 - Baghouse	\$ 0	\$ 0	\$ 0	\$ 0	\$ 1,121,941	\$ 9,155,038	\$ 9,338,139	\$ 9,524,902	\$ 9,715,400	\$ 9,909,708
Mill Creek 3 - SAM Mitigation	\$ 0	\$ 0	\$ 1,693,407	\$ 3,454,550	\$ 3,523,641	\$ 3,594,114	\$ 3,665,997	\$ 3,739,316	\$ 3,814,103	\$ 3,890,365
Mill Creek 3 - SCR Turn-Down	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0
Total Mill Creek 3	\$ 0	\$ 0	\$ 1,693,407	\$ 3,447,748	\$ 4,857,328	\$ 13,019,344	\$ 13,333,943	\$ 13,654,833	\$ 13,982,142	\$ 14,315,996
Mill Creek 4 - FGD	\$ 0	\$ 0	\$ 0	\$ 20,421	\$ 359,055	\$ 417,926	\$ 477,974	\$ 539,223	\$ 601,697	\$ 665,421
Mill Creek 4 - Baghouse	\$ 0	\$ 0	\$ 0	\$ 3,552,924	\$ 10,871,949	\$ 11,089,388	\$ 11,311,175	\$ 11,537,399	\$ 11,768,147	\$ 12,003,510
Mill Creek 4 - SAM Mitigation	\$ 0	\$ 0	\$ 0	\$ 58,392	\$ 4,288,302	\$ 4,374,068	\$ 4,461,549	\$ 4,550,780	\$ 4,641,795	\$ 4,734,632
Mill Creek 4 - SCR Turn-Down	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0
Total Mill Creek 4	\$ 0	\$ 0	\$ 0	\$ 3,631,737	\$ 15,519,305	\$ 15,881,381	\$ 16,250,699	\$ 16,627,402	\$ 17,011,640	\$ 17,403,563
Proposed Project 27 TC:1 Air Compliance - Baghouse	\$ 0	\$ 0	\$ 0	\$ 0	\$ 3,732,365	\$ 7,614,024	\$ 7,766,305	\$ 7,921,631	\$ 8,080,064	\$ 8,241,665

Incremental O&M Estimates for Projects in the 2011 ECR Plan

		2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
Area below used as inputs into Project tabs											
# Beneficial Reuse											
Kentucky Utilities Company											
Amended Project 29	BR Landfill (Phase I)	\$ -	\$ -	\$ -	\$ 2,813,772	\$ 2,898,185	\$ 2,985,131	\$ 3,074,685	\$ 3,166,925	\$ 3,261,933	\$ 3,359,791
Proposed Project 34	BR Air Compliance - Baghouses	\$ -	\$ -	\$ -	\$ 7,536,179	\$ 16,368,110	\$ 19,085,903	\$ 19,467,621	\$ 19,856,973	\$ 20,254,113	\$ 20,659,195
	Brown 1 - Baghouse	\$ 0	\$ 0	\$ 0	\$ 1,559,509	\$ 2,386,049	\$ 2,433,759	\$ 2,482,445	\$ 2,532,094	\$ 2,582,736	\$ 2,634,390
	Brown 1 - SAM Mitigation	\$ 0	\$ 0	\$ 0	\$ 923,835	\$ 2,423,086	\$ 2,471,548	\$ 2,520,979	\$ 2,571,398	\$ 2,622,826	\$ 2,675,283
	Total Brown 1	\$ -	\$ -	\$ -	\$ 2,483,343	\$ 4,809,135	\$ 4,905,317	\$ 5,003,424	\$ 5,103,492	\$ 5,205,562	\$ 5,309,673
	Brown 2 - Baghouse	\$ 0	\$ 0	\$ 0	\$ 3,271,155	\$ 4,448,770	\$ 4,537,746	\$ 4,628,501	\$ 4,721,071	\$ 4,815,492	\$ 4,911,802
	Brown 2 - SAM Mitigation	\$ 0	\$ 0	\$ 0	\$ 1,761,681	\$ 2,423,086	\$ 2,471,548	\$ 2,520,979	\$ 2,571,398	\$ 2,622,826	\$ 2,675,283
	Total Brown 2	\$ -	\$ -	\$ -	\$ 5,032,836	\$ 6,871,856	\$ 7,009,293	\$ 7,149,479	\$ 7,292,469	\$ 7,438,318	\$ 7,587,085
	Brown 3 - Baghouse	\$ 0	\$ 0	\$ 0	\$ 0	\$ 4,687,119	\$ 7,171,292	\$ 7,314,718	\$ 7,461,012	\$ 7,610,232	\$ 7,762,437
	Total Brown 3	\$ -	\$ 8,692	\$ 8,228,481	\$ 25,061,610	\$ 41,503,865	\$ 64,806,127	\$ 66,102,250	\$ 67,424,295	\$ 68,772,781	\$ 70,148,237
Proposed Project 35	GH Air Compliance - Baghouses	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
	Ghent 1 - Baghouse	\$ 0	\$ 0	\$ 0	\$ 7,885,837	\$ 12,065,330	\$ 12,306,637	\$ 12,552,769	\$ 12,803,825	\$ 13,059,901	\$ 13,321,099
	Ghent 1 - SCR Turn-Down	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0
	Ghent 1 - SAM Mitigation	\$ 0	\$ 0	\$ 0	\$ 2,730,914	\$ 5,013,957	\$ 5,114,237	\$ 5,220,852	\$ 5,327,269	\$ 5,435,814	\$ 5,546,530
	Total Ghent 1	\$ -	\$ -	\$ -	\$ 2,730,914	\$ 12,899,794	\$ 17,523,158	\$ 17,873,621	\$ 18,231,093	\$ 18,595,715	\$ 18,967,630
	Ghent 2 - Baghouse	\$ 0	\$ 0	\$ 0	\$ 881,024	\$ 10,783,730	\$ 10,999,405	\$ 11,219,393	\$ 11,443,781	\$ 11,672,657	\$ 11,906,110
	Ghent 2 - SAM Mitigation	\$ 8,692	\$ 1,276,696	\$ 1,276,696	\$ 1,302,230	\$ 1,328,274	\$ 1,354,840	\$ 1,381,937	\$ 1,409,575	\$ 1,437,767	\$ 1,466,522
	Total Ghent 2	\$ 8,692	\$ 1,276,696	\$ 1,276,696	\$ 2,183,254	\$ 12,112,005	\$ 12,354,245	\$ 12,601,330	\$ 12,853,356	\$ 13,110,424	\$ 13,372,632
	Ghent 3 - Baghouse	\$ 0	\$ 0	\$ 0	\$ 0	\$ 1,547,134	\$ 12,624,612	\$ 12,877,104	\$ 13,134,646	\$ 13,397,339	\$ 13,665,286
	Ghent 3 - SCR Turn-Down	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0
	Ghent 3 - SAM Mitigation	\$ 0	\$ 0	\$ 0	\$ 642,953	\$ 4,721,847	\$ 4,912,610	\$ 5,010,862	\$ 5,111,079	\$ 5,213,301	\$ 5,317,567
	Total Ghent 3	\$ -	\$ -	\$ -	\$ 642,953	\$ 4,721,847	\$ 6,365,418	\$ 17,537,222	\$ 18,245,725	\$ 18,610,640	\$ 18,982,853
	Ghent 4 - Baghouse	\$ 0	\$ 0	\$ 0	\$ 0	\$ 487,027	\$ 11,922,417	\$ 12,160,865	\$ 12,404,082	\$ 12,652,164	\$ 12,905,207
	Ghent 4 - SCR Turn-Down	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0
	Ghent 4 - SAM Mitigation	\$ 0	\$ 0	\$ 0	\$ 3,578,918	\$ 5,256,715	\$ 5,469,086	\$ 5,578,468	\$ 5,690,037	\$ 5,803,838	\$ 5,919,915
	Total Ghent 4	\$ -	\$ -	\$ -	\$ 3,578,918	\$ 5,256,715	\$ 5,848,876	\$ 17,391,503	\$ 18,094,120	\$ 18,456,002	\$ 18,825,122

**Revenue Requirements Summary
2011 Amended Plan - LG&E**

Project 26	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
MC Air Compliance - All Units - FGDs & PM Control Systems										
Revenue Requirement										
Eligible Plant	9,618,429	223,007,642	635,707,764	1,006,220,362	1,260,668,843	1,268,214,657	1,268,214,657	1,268,214,657	1,268,214,657	1,268,214,657
Less: Retired Plant	-	-	-	(66,093,145)	(171,243,250)	(171,243,250)	(171,243,250)	(171,243,250)	(171,243,250)	(171,243,250)
Less: Accumulated Depreciation	-	-	-	(2,051,239)	(40,402,159)	(92,361,100)	(144,320,041)	(196,278,982)	(248,237,922)	(300,196,863)
Plus: Accumulated Depreciation on retired plant	-	-	-	33,754,526	107,305,608	107,305,608	107,305,608	107,305,608	107,305,608	107,305,608
Less: Deferred Tax Balance	-	-	-	(5,075,817)	(13,943,352)	(27,194,621)	(38,060,062)	(46,720,057)	(53,337,644)	(68,067,671)
Plus: Deferred Tax Balance on retired plant	-	-	-	3,536,499	5,341,429	5,341,429	5,341,429	5,341,429	5,341,429	5,341,429
Environmental Compliance Rate Base	9,618,429	223,007,642	635,707,764	970,291,187	1,147,727,118	1,090,062,723	1,027,238,342	966,619,405	908,042,877	851,353,909
Rate of return	11.31%	11.31%	11.31%	11.31%	11.31%	11.31%	11.31%	11.31%	11.31%	11.31%
	\$ 1,088,109	\$ 25,228,303	\$ 71,916,049	\$ 109,766,644	\$ 129,839,533	\$ 123,316,102	\$ 116,208,935	\$ 109,351,265	\$ 102,724,647	\$ 96,311,564
Operating expenses	-	-	1,693,407	7,079,485	31,875,726	47,403,071	48,528,230	49,675,892	50,846,507	52,040,535
Annual Depreciation expense	-	-	-	2,051,239	38,350,920	51,958,941	51,958,941	51,958,941	51,958,941	51,958,941
Less depreciation on retired plant	-	-	-	206,498	(907,630)	(907,630)	(907,630)	(907,630)	(907,630)	(907,630)
Annual Property Tax expense	-	14,428	334,511	953,562	1,506,254	1,830,400	1,763,780	1,685,842	1,607,904	1,529,965
Total OE	\$ -	\$ 14,428	\$ 2,027,919	\$ 10,290,783	\$ 70,825,269	\$ 100,284,782	\$ 101,343,321	\$ 102,413,045	\$ 103,505,721	\$ 104,621,811
Total E(m)	1,088,109	25,242,731	73,943,967	120,057,427	200,664,802	223,600,884	217,552,256	211,764,309	206,230,368	200,933,375

Revenue Requirements Summary 2011 Amended Plan - LG&E

Project 27	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
TC1 Air Compliance - PM Control Systems										
Revenue Requirement										
Eligible Plant	-	-	23,479,869	61,329,417	118,470,025	123,752,357	123,752,357	123,752,357	123,752,357	123,752,357
Less: Retired Plant	-	-	-	-	-	-	-	-	-	-
Less: Accumulated Depreciation	-	-	-	-	(536,077)	(5,015,912)	(9,495,748)	(13,975,583)	(18,455,418)	(22,935,254)
Plus: Accumulated Depreciation on retired plant	-	-	-	-	-	-	-	-	-	-
Less: Deferred Tax Balance	-	-	-	-	(1,395,029)	(2,985,498)	(4,336,446)	(5,466,435)	(6,391,372)	(7,127,169)
Plus: Deferred Tax Balance on retired plant	-	-	-	-	-	-	-	-	-	-
Environmental Compliance Rate Base	-	-	23,479,869	61,329,417	116,538,920	115,750,947	109,920,164	104,310,340	98,905,567	93,689,935
Rate of return	11.31%	11.31%	11.31%	11.31%	11.31%	11.31%	11.31%	11.31%	11.31%	11.31%
\$	-	-	\$ 2,656,220	\$ 6,938,045	\$ 13,183,760	\$ 13,094,619	\$ 12,434,997	\$ 11,800,371	\$ 11,188,942	\$ 10,598,911
Operating expenses										
Annual Depreciation expense	-	-	-	-	3,732,365	7,614,024	7,766,305	7,921,631	8,080,064	8,241,665
Less depreciation on retired plant	-	-	-	-	536,077	4,479,835	4,479,835	4,479,835	4,479,835	4,479,835
Annual Property Tax expense	-	-	-	-	-	-	-	-	-	-
Total OE	\$	-	\$	35,220	91,994	176,901	178,105	171,385	164,665	157,945
Total E(m)	-	-	2,656,220	6,973,265	17,544,196	25,365,379	24,859,241	24,373,222	23,913,506	23,478,356

**Revenue Requirements Summary
2011 Amended Plan - LG&E**

	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
Total E(m) - All LG&E Projects	1,088,109	25,242,731	76,600,187	127,030,692	218,208,998	248,966,263	242,411,497	236,137,532	230,143,875	224,411,731
Total Revenue Requirements	1,088,109	25,242,731	76,600,187	127,030,692	218,208,998	248,966,263	242,411,497	236,137,532	230,143,875	224,411,731
Project 26	1,088,109	25,242,731	73,943,967	120,057,427	200,664,802	223,600,884	217,552,256	211,764,309	206,230,368	200,933,375
Project 27	-	-	2,656,220	6,973,265	17,544,196	25,365,379	24,859,241	24,373,222	23,913,506	23,478,356
Total	1,088,109	25,242,731	76,600,187	127,030,692	218,208,998	248,966,263	242,411,497	236,137,532	230,143,875	224,411,731
12 Month Average Jurisdictional Ratio	87.20%	87.20%	87.20%	87.20%	87.20%	87.20%	87.20%	87.20%	87.20%	87.20%
Jurisdictional Allocation	948,858	22,012,293	66,797,278	110,773,939	190,283,702	217,104,806	211,388,886	205,917,831	200,691,212	195,692,640
Forecasted 12-Month Retail Revenue	896,759,953	955,916,819	1,012,748,964	1,038,491,023	1,076,945,865	1,130,945,501	1,185,411,298	1,235,773,390	1,292,678,978	1,331,079,773
Billing Factor	0.11%	2.30%	6.60%	10.67%	17.67%	19.20%	17.68%	16.66%	15.53%	14.70%
LGE Residential Bill Impact										
Customer Charge	\$8.50	\$8.50	\$8.50	\$8.50	\$8.50	\$8.50	\$8.50	\$8.50	\$8.50	\$8.50
Energy - 1,000 Kwh @ \$0.07068	\$70.68	\$70.68	\$70.68	\$70.68	\$70.68	\$70.68	\$70.68	\$70.68	\$70.68	\$70.68
FAC billings (Dec 10 factor - \$0.00241/KWh)	\$2.41	\$2.41	\$2.41	\$2.41	\$2.41	\$2.41	\$2.41	\$2.41	\$2.41	\$2.41
DSM billings (Dec 10 factor - \$0.0035/KWh)	\$3.50	\$3.50	\$3.50	\$3.50	\$3.50	\$3.50	\$3.50	\$3.50	\$3.50	\$3.50
ECR billings (Dec 10 factor: 1.29%)	\$1.10	\$1.10	\$1.10	\$1.10	\$1.10	\$1.10	\$1.10	\$1.10	\$1.10	\$1.10
Additional ECR factor	\$0.09	\$1.96	\$5.61	\$9.08	\$15.03	\$16.33	\$15.05	\$14.18	\$13.21	\$12.51

**Summary Cash Flow
Cash Flow for 2011 thru 2020
2011 LG&E Amended ECR Plan**

Date	MC FGDs -		MC FGDs - MC3		MC FGDs - MC4		MC Air		MC Air		MC Air		MC Air		Total
	(Project 26)	(Project 26)	(Project 26)	(Project 26)	(Project 26)	(Project 26)	(Project 26)	(Project 26)	(Project 26)	(Project 26)	(Project 26)	(Project 26)	(Project 26)	(Project 27)	
2009	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
2010	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
2011	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
2012	\$ 50,384,502	\$ 6,892,461	\$ 70,537,279	\$ 4,049,212	\$ 13,571,615	\$ 12,967,870	\$ 4,615,765	\$ 192,372	\$ 5,376,845	\$ 54,419,721	\$ -	\$ -	\$ -	\$ -	\$ 9,618,429
2013	\$ 104,789,763	\$ 32,256,716	\$ 87,592,561	\$ 87,592,561	\$ 42,786,743	\$ 41,386,870	\$ 45,032,370	\$ 49,061,558	\$ 58,845,089	\$ 39,657,052	\$ 23,479,869	\$ -	\$ -	\$ -	\$ 213,389,212
2014	\$ 108,991,754	\$ 29,819,542	\$ 44,293,005	\$ 44,293,005	\$ 49,569,616	\$ 48,120,072	\$ 49,061,558	\$ 43,768,430	\$ 9,115,060	\$ 57,140,608	\$ 37,849,548	\$ -	\$ -	\$ -	\$ 436,179,991
2015	\$ 89,616,306	\$ 3,876,540	\$ 11,842,514	\$ 11,842,514	\$ 48,617,414	\$ 47,612,217	\$ 7,545,814	\$ -	\$ -	\$ 5,282,332	\$ -	\$ -	\$ -	\$ -	\$ 408,362,146
2016	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 311,589,089
2017	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 12,828,146
2018	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
2019	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
2020	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
	\$ 353,792,325	\$ 72,845,258	\$ 218,314,571	\$ 218,314,571	\$ 154,545,388	\$ 151,087,029	\$ 150,216,309	\$ 167,413,776	\$ 123,752,357	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 1,391,967,014

**Revenue Requirements
Project 26 - LG&E**

In-Service	April									
	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
Mill Creek 2FC										
CapEx - Mill Creek FGDs - Combined MCI-MCZ new FGD	\$ -	\$ 50,384,502	\$ 104,799,763	\$ 108,991,754	\$ 89,616,306	\$ -	\$ -	\$ -	\$ -	\$ -
Accumulated Expenditures	\$ -	\$ 50,384,502	\$ 155,184,265	\$ 264,176,019	\$ 353,792,325	\$ 353,792,325	\$ 353,792,325	\$ 353,792,325	\$ 353,792,325	\$ 353,792,325
Book Depreciation rate, per year	0.000%	0.000%	0.000%	0.000%	4.280%	4.280%	4.280%	4.280%	4.280%	4.280%
Tax Depreciation rate, per year	0.000%	0.000%	0.000%	0.000%	3.750%	7.219%	6.677%	6.177%	5.713%	5.285%
Income tax rate	35.71%	35.71%	35.71%	35.71%	35.71%	35.71%	35.71%	35.71%	35.71%	35.71%
Deferred Tax Balance	-	-	-	-	907,537	4,620,647	7,646,999	10,045,654	11,856,095	13,125,805
Book Accumulated Depreciation Balance	-	-	-	-	10,725,804	25,668,115	41,010,427	56,152,739	71,295,050	86,437,362
Unrecovered Investment - Book	-	50,384,502	155,184,265	264,176,019	353,792,325	353,792,325	353,792,325	353,792,325	353,792,325	353,792,325
Book Depreciation	-	-	-	-	10,725,804	15,142,312	15,142,312	15,142,312	15,142,312	15,142,312
Unrecovered Investment - Tax total	-	50,384,502	155,184,265	264,176,019	353,792,325	353,792,325	353,792,325	353,792,325	353,792,325	353,792,325
Tax Depreciation	-	-	-	-	13,267,212	25,540,268	23,622,714	21,853,752	20,212,156	18,697,924
Allowed Rate of Return	11.31%	11.31%	11.31%	11.31%	11.31%	11.31%	11.31%	11.31%	11.31%	11.31%
Book Depreciation expense total	-	-	-	-	10,725,804	15,142,312	15,142,312	15,142,312	15,142,312	15,142,312
Tax Depreciation expense total	-	-	-	-	13,267,212	25,540,268	23,622,714	21,853,752	20,212,156	18,697,924
Annual Property Tax Rate	0.1500%	0.1500%	0.1500%	0.1500%	0.1500%	0.1500%	0.1500%	0.1500%	0.1500%	0.1500%
Deferred Tax Balance	-	-	-	-	907,537	3,713,110	3,028,352	2,395,655	1,810,441	1,265,709
Revenue Recovery on Capital Expenditure to date										
Eligible Plant, cumulative capital expenditures	-	50,384,502	155,184,265	264,176,019	353,792,325	353,792,325	353,792,325	353,792,325	353,792,325	353,792,325
Less: Recovered Plant	-	-	-	-	(91,533,054)	(91,533,054)	(91,533,054)	(91,533,054)	(91,533,054)	(91,533,054)
Less: Accumulated Depreciation	-	-	-	-	(10,725,804)	(25,668,115)	(41,010,427)	(56,152,739)	(71,295,050)	(86,437,362)
Plus: Accumulated Depreciation on Retired Plant	-	-	-	-	67,043,393	67,043,393	67,043,393	67,043,393	67,043,393	67,043,393
Less: Deferred Tax Balance	-	-	-	-	(907,537)	(4,620,647)	(7,646,999)	(10,045,654)	(11,856,095)	(13,125,805)
Plus: Deferred Tax Balance on Retired Plant	-	-	-	-	1,722,429	1,722,429	1,722,429	1,722,429	1,722,429	1,722,429
Environmental Compliance Rate Base	-	50,384,502	155,184,265	264,176,019	319,391,751	300,536,329	282,365,666	264,826,699	247,873,946	231,461,925
Rate of return	11.31%	11.31%	11.31%	11.31%	11.31%	11.31%	11.31%	11.31%	11.31%	11.31%
Return on Environmental Compliance Rate Base	\$ -	\$ 5,699,874	\$ 17,555,612	\$ 29,865,980	\$ 36,132,000	\$ 33,998,932	\$ 31,943,330	\$ 29,959,190	\$ 28,041,367	\$ 26,184,716
Operating Expenses										
Annual Depreciation expense	-	-	-	-	(236,824)	(294,074)	(228,759)	(162,138)	(94,185)	(24,872)
Less: Depreciation on retired plant	-	-	-	-	10,725,804	15,142,312	15,142,312	15,142,312	15,142,312	15,142,312
Annual Property Tax expense	-	-	-	-	(3,958,924)	(5,358,924)	(4,968,924)	(4,578,924)	(4,188,924)	(3,798,924)
Total OE	-	-	-	-	75,577	232,776	232,776	232,776	232,776	232,776
Total E(m) - Project	-	5,699,874	17,631,189	30,118,357	46,711,221	49,055,747	47,042,746	45,102,514	43,229,931	41,419,878

**Revenue Requirements
Project 26 - LG&E**

	November									
	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
In-Service				1	2	3	4	5	6	7
Mill Creek JFC										
CapEx - Mill Creek FGDs - MC3 FGD (Old MC4 FGD tied-in)	\$ -	\$ 6,892,461	\$ 32,256,716	\$ 29,819,542	\$ 3,876,540	\$ -	\$ -	\$ -	\$ -	\$ -
Accumulated Expenditures	\$ -	\$ 6,892,461	\$ 39,149,176	\$ 68,968,718	\$ 72,845,258	\$ 72,845,258	\$ 72,845,258	\$ 72,845,258	\$ 72,845,258	\$ 72,845,258
Book Depreciation rate, per year	0.000%	0.000%	0.000%	3.850%	3.850%	3.850%	3.850%	3.850%	3.850%	3.850%
Tax Depreciation rate, per year	0.000%	0.000%	0.000%	3.750%	7.219%	6.677%	6.177%	5.713%	5.285%	4.888%
Income tax rate	35.71%	35.71%	35.71%	35.71%	35.71%	35.71%	35.71%	35.71%	35.71%	35.71%
Deferred Tax Balance	-	-	-	805,052	1,681,431	2,416,820	3,022,143	3,506,766	3,880,053	4,150,069
Book Accumulated Depreciation Balance	-	-	-	331,912	3,136,454	5,940,997	8,746,539	11,550,082	14,354,624	17,159,167
Unrecovered Investment - Book	-	6,892,461	39,149,176	68,968,718	72,845,258	72,845,258	72,845,258	72,845,258	72,845,258	72,845,258
Book Depreciation	-	-	-	331,912	2,804,542	2,804,542	2,804,542	2,804,542	2,804,542	2,804,542
Unrecovered Investment - Tax total	-	6,892,461	39,149,176	68,968,718	72,845,258	72,845,258	72,845,258	72,845,258	72,845,258	72,845,258
Tax Depreciation	-	-	-	2,566,327	5,259,699	4,863,878	4,499,652	4,161,650	3,849,872	3,560,676
Allowed Rate of Return	11.31%	11.31%	11.31%	11.31%	11.31%	11.31%	11.31%	11.31%	11.31%	11.31%
Book Depreciation expense total	-	-	-	331,912	2,804,542	2,804,542	2,804,542	2,804,542	2,804,542	2,804,542
Tax Depreciation expense total	-	-	-	2,566,327	5,259,699	4,863,878	4,499,652	4,161,650	3,849,872	3,560,676
Annual Property Tax Rate	0.1500%	0.1500%	0.1500%	0.1500%	0.1500%	0.1500%	0.1500%	0.1500%	0.1500%	0.1500%
Deferred Tax Balance	-	-	-	805,052	876,379	735,389	605,323	484,623	373,287	270,015
Revenue Recovery on Capital Expenditure to date										
Eligible Plant, cumulative capital expenditures	-	6,892,461	39,149,176	68,968,718	72,845,258	72,845,258	72,845,258	72,845,258	72,845,258	72,845,258
Less: Reversal Plant	-	-	-	(66,093,145)	(66,093,145)	(66,093,145)	(66,093,145)	(66,093,145)	(66,093,145)	(66,093,145)
Less: Accumulated Depreciation	-	-	-	(331,912)	(3,136,454)	(5,940,997)	(8,746,539)	(11,550,082)	(14,354,624)	(17,159,167)
Plus: Accumulated Depreciation on Reversal Plant	-	-	-	33,754,526	33,754,526	33,754,526	33,754,526	33,754,526	33,754,526	33,754,526
Less: Deferred Tax Balance	-	-	-	(805,052)	(1,681,431)	(2,416,820)	(3,022,143)	(3,506,766)	(3,880,053)	(4,150,069)
Plus: Deferred Tax Balance on Reversal Plant	-	-	-	3,536,499	3,536,499	3,536,499	3,536,499	3,536,499	3,536,499	3,536,499
Environmental Compliance Rate Base	-	6,892,461	39,149,176	39,029,635	39,225,254	35,665,322	32,275,457	28,986,291	25,808,462	22,733,904
Rate of return	11.31%	11.31%	11.31%	11.31%	11.31%	11.31%	11.31%	11.31%	11.31%	11.31%
Return on Environmental Compliance Rate Base	\$ -	\$ 779,727	\$ 4,428,850	\$ 4,415,326	\$ 4,437,456	\$ 4,036,992	\$ 3,651,243	\$ 3,279,147	\$ 2,919,647	\$ 2,571,830
Operating Expenses										
Annual Depreciation expense	-	-	-	(6,803)	211,745	270,192	329,008	380,615	452,639	515,904
Less: Depreciation on reversed plant	-	-	-	331,912	2,804,542	2,804,542	2,804,542	2,804,542	2,804,542	2,804,542
Annual Property Tax expense	-	-	-	298,498	208,495	208,495	208,495	208,495	208,495	208,495
Total OE	\$ -	\$ -	\$ 10,339	\$ 590,331	\$ 3,325,741	\$ 3,385,795	\$ 3,441,204	\$ 3,497,805	\$ 3,555,622	\$ 3,614,680
Total E(m) - Project	-	779,727	4,439,188	5,005,657	7,763,197	7,422,788	7,092,447	6,776,953	6,475,270	6,186,510

**Revenue Requirements
Project 26 - LG&E**

	November									
	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
In-Service				1	2	3	4	5	6	7
Mill Creek 4PC										
CapEx - Mill Creek FGDs - MC4 New FGD	\$ 4,049,212	\$ 70,537,279	\$ 87,592,561	\$ 44,293,005	\$ 11,842,514	\$ -	\$ -	\$ -	\$ -	\$ -
Accumulated Expenditures	\$ 4,049,212	\$ 74,586,491	\$ 162,179,052	\$ 206,472,057	\$ 218,314,571	\$ 218,314,571	\$ 218,314,571	\$ 218,314,571	\$ 218,314,571	\$ 218,314,571
Book Depreciation rate, per year	0.000%	0.000%	0.000%	3.710%	3.710%	3.710%	3.710%	3.710%	3.710%	3.710%
Tax Depreciation rate, per year	0.000%	0.000%	0.000%	3.750%	7.219%	6.677%	6.177%	5.713%	5.285%	4.888%
Income tax rate	35.71%	35.71%	35.71%	35.71%	35.71%	35.71%	35.71%	35.71%	35.71%	35.71%
Deferred Tax Balance	-	-	-	2,422,991	5,158,612	7,471,689	9,394,965	10,956,507	12,184,379	13,102,749
Book Accumulated Depreciation Balance	-	-	-	957,514	9,056,985	17,156,465	25,255,926	33,355,397	41,454,867	49,554,338
Unrecovered Investment - Book	4,049,212	74,586,491	162,179,052	206,472,057	218,314,571	218,314,571	218,314,571	218,314,571	218,314,571	218,314,571
Book Depreciation	-	-	-	957,514	8,099,471	8,099,471	8,099,471	8,099,471	8,099,471	8,099,471
Unrecovered Investment - Tax total	4,049,212	74,586,491	162,179,052	206,472,057	218,314,571	218,314,571	218,314,571	218,314,571	218,314,571	218,314,571
Tax Depreciation	-	-	-	7,742,702	15,760,129	14,576,864	13,485,291	12,472,311	11,537,925	10,671,216
Allowed Rate of Return	11.31%	11.31%	11.31%	11.31%	11.31%	11.31%	11.31%	11.31%	11.31%	11.31%
Book Depreciation expense total	-	-	-	957,514	8,099,471	8,099,471	8,099,471	8,099,471	8,099,471	8,099,471
Tax Depreciation expense total	-	-	-	7,742,702	15,760,129	14,576,864	13,485,291	12,472,311	11,537,925	10,671,216
Annual Property Tax Rate	0.1500%	0.1500%	0.1500%	0.1500%	0.1500%	0.1500%	0.1500%	0.1500%	0.1500%	0.1500%
Deferred Tax Balance	-	-	-	2,422,991	2,735,621	2,313,077	1,923,276	1,561,541	1,227,872	918,370
Revenue Recovery on Capital Expenditure to date										
Eligible Plant, cumulative capital expenditures	4,049,212	74,586,491	162,179,052	206,472,057	218,314,571	218,314,571	218,314,571	218,314,571	218,314,571	218,314,571
Less: Retired Plant	-	-	-	-	-	-	-	-	-	-
Plus: Accumulated Depreciation on Retired Plant	-	-	-	(957,514)	(9,056,985)	(17,156,465)	(25,255,926)	(33,355,397)	(41,454,867)	(49,554,338)
Less: Deferred Tax Balance	-	-	-	(2,422,991)	(5,158,612)	(7,471,689)	(9,394,965)	(10,956,507)	(12,184,379)	(13,102,749)
Plus: Deferred Tax Balance on Retired Plant	-	-	-	-	-	-	-	-	-	-
Environmental Compliance Rate Base	4,049,212	74,586,491	162,179,052	203,091,552	204,098,975	193,686,427	183,663,680	174,002,668	164,675,325	155,657,484
Rate of return	11.31%	11.31%	11.31%	11.31%	11.31%	11.31%	11.31%	11.31%	11.31%	11.31%
Return on Environmental Compliance Rate Base	\$ 458,077	\$ 8,437,765	\$ 18,346,915	\$ 22,975,245	\$ 23,086,213	\$ 21,911,267	\$ 20,777,418	\$ 19,684,482	\$ 18,629,313	\$ 17,609,147
Operating Expenses										
Annual Depreciation expense	-	-	-	20,421	359,055	417,974	477,974	539,223	601,697	665,421
Less: Depreciation on Retired Plant	-	-	-	957,514	8,099,471	8,099,471	8,099,471	8,099,471	8,099,471	8,099,471
Annual Property Tax expense	-	-	-	243,269	308,272	313,866	301,737	289,588	277,439	265,290
Total OE	-	-	-	1,221,204	1,076,797	8,831,263	8,879,182	8,928,282	9,376,607	9,030,181
Total E(m) - Project	458,077	8,443,859	18,458,795	24,196,449	31,856,010	30,742,550	29,656,600	28,612,774	27,607,919	26,639,328

**Revenue Requirements
Project 26 - LG&E**

	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
In-Service					May					
Mill Creek TNPC					1	2	3	4	5	6
CapEx - MC1 PM Control System - SAM Mitigation	\$ -	\$ 13,571,615	\$ 42,786,743	\$ 49,569,616	\$ 48,617,414	\$ -	\$ -	\$ -	\$ -	\$ -
Accumulated Expenditures	\$ -	\$ 13,571,615	\$ 56,358,358	\$ 105,927,974	\$ 154,545,388	\$ 154,545,388	\$ 154,545,388	\$ 154,545,388	\$ 154,545,388	\$ 154,545,388
Book Depreciation rate, per year	0.000%	0.000%	0.000%	0.000%	4.240%	4.240%	4.240%	4.240%	4.240%	4.240%
Tax Depreciation rate, per year	0.000%	0.000%	0.000%	0.000%	3.750%	7.219%	6.677%	6.177%	5.713%	5.285%
Income tax rate	35.71%	35.71%	35.71%	35.71%	35.71%	35.71%	35.71%	35.71%	35.71%	35.71%
Deferred Tax Balance	-	-	-	-	607,070	2,251,125	3,596,060	4,665,055	5,477,977	6,054,693
Book Accumulated Depreciation Balance	-	-	-	-	4,095,453	10,648,177	17,200,902	23,753,626	30,306,351	36,859,075
Unrecovered Investment - Book	-	\$ 13,571,615	\$ 56,358,358	\$ 105,927,974	\$ 154,545,388	\$ 154,545,388	\$ 154,545,388	\$ 154,545,388	\$ 154,545,388	\$ 154,545,388
Book Depreciation	-	-	-	-	4,095,453	6,552,724	6,552,724	6,552,724	6,552,724	6,552,724
Unrecovered Investment - Tax total	-	\$ 13,571,615	\$ 56,358,358	\$ 105,927,974	\$ 154,545,388	\$ 154,545,388	\$ 154,545,388	\$ 154,545,388	\$ 154,545,388	\$ 154,545,388
Tax Depreciation	-	-	-	-	5,795,452	11,156,632	10,318,996	9,546,269	8,829,178	8,167,724
Allowed Rate of Return	11.31%	11.31%	11.31%	11.31%	11.31%	11.31%	11.31%	11.31%	11.31%	11.31%
Book Depreciation expense total	-	-	-	-	4,095,453	6,552,724	6,552,724	6,552,724	6,552,724	6,552,724
Tax Depreciation expense total	-	-	-	-	5,795,452	11,156,632	10,318,996	9,546,269	8,829,178	8,167,724
Annual Property Tax Rate	0.1500%	0.1500%	0.1500%	0.1500%	0.1500%	0.1500%	0.1500%	0.1500%	0.1500%	0.1500%
Deferred Tax Balance	-	-	-	-	607,070	1,644,055	1,344,935	1,068,995	812,922	576,716
Revenue Recovery on Capital Expenditure to date										
Eligible Plant, cumulative capital expenditures	-	\$ 13,571,615	\$ 56,358,358	\$ 105,927,974	\$ 154,545,388	\$ 154,545,388	\$ 154,545,388	\$ 154,545,388	\$ 154,545,388	\$ 154,545,388
Less: Retired Plant	-	-	-	-	(2,532,868)	(2,532,868)	(2,532,868)	(2,532,868)	(2,532,868)	(2,532,868)
Less: Accumulated Depreciation	-	-	-	-	(4,095,453)	(10,648,177)	(17,200,902)	(23,753,626)	(30,306,351)	(36,859,075)
Plus: Accumulated Depreciation on Retired Plant	-	-	-	-	2,410,292	2,410,292	2,410,292	2,410,292	2,410,292	2,410,292
Less: Deferred Tax Balance	-	-	-	-	(607,070)	(2,251,125)	(3,596,060)	(4,665,055)	(5,477,977)	(6,054,693)
Plus: Deferred Tax Balance on Retired Plant	-	-	-	-	19,604	19,604	19,604	19,604	19,604	19,604
Environmental Compliance Rate Base	-	\$ 13,571,615	\$ 56,358,358	\$ 105,927,974	\$ 149,739,893	\$ 141,543,114	\$ 133,645,454	\$ 126,023,735	\$ 118,659,089	\$ 111,528,648
Rate of return	11.31%	11.31%	11.31%	11.31%	11.31%	11.31%	11.31%	11.31%	11.31%	11.31%
Return on Environmental Compliance Rate Base	\$ -	\$ 1,535,323	\$ 6,375,692	\$ 11,983,370	\$ 16,939,704	\$ 16,012,423	\$ 15,118,990	\$ 14,256,754	\$ 13,423,496	\$ 12,616,960
Operating Expenses										
Annual Depreciation expense	-	-	-	-	5,296,902	9,156,028	9,399,149	9,525,932	9,716,451	9,910,780
Less: Depreciation on Retired Plant	-	-	-	-	(4,095,453)	(6,552,724)	(6,552,724)	(6,552,724)	(6,552,724)	(6,552,724)
Annual Property Tax expense	-	-	-	-	(8,549)	(8,549)	(8,549)	(8,549)	(8,549)	(8,549)
Total OE	\$ -	\$ -	\$ 20,357	\$ 84,538	\$ 158,892	\$ 225,675	\$ 215,846	\$ 206,017	\$ 196,188	\$ 186,359
Total E(m) - Project	-	1,535,323	6,396,039	12,067,907	25,484,001	31,937,901	31,217,750	30,532,477	29,879,910	29,257,873

**Revenue Requirements
Project 26 - LG&E**

	April									
	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
In-Service					1	2	3	4	5	6
Mill Creek ZNFC										
CapEx - MC2 PM Control System - SAM Mitigation	\$ -	\$ 12,967,870	\$ 41,386,870	\$ 49,120,072	\$ 47,612,217	\$ -	\$ -	\$ -	\$ -	\$ -
Accumulated Expenditures	\$ -	\$ 12,967,870	\$ 54,354,740	\$ 103,474,812	\$ 151,087,029	\$ 151,087,029	\$ 151,087,029	\$ 151,087,029	\$ 151,087,029	\$ 151,087,029
Book Depreciation rate, per year	0.000%	0.000%	0.000%	0.000%	4.700%	4.700%	4.700%	4.700%	4.700%	4.700%
Tax Depreciation rate, per year	0.000%	0.000%	0.000%	0.000%	3.750%	7.219%	6.677%	6.177%	5.713%	5.285%
Income tax rate	35.71%	35.71%	35.71%	35.71%	35.71%	35.71%	35.71%	35.71%	35.71%	35.71%
Deferred Tax Balance	-	-	-	-	227,053	1,566,134	2,652,788	3,449,676	3,996,222	4,311,848
Book Accumulated Depreciation Balance	-	-	-	-	5,029,939	12,131,029	19,232,120	26,333,210	33,434,301	40,535,391
Unrecovered Investment - Book	-	12,967,870	54,354,740	103,474,812	151,087,029	151,087,029	151,087,029	151,087,029	151,087,029	151,087,029
Book Depreciation	-	-	-	-	5,029,939	7,101,090	7,101,090	7,101,090	7,101,090	7,101,090
Unrecovered Investment - Tax total	-	12,967,870	54,354,740	103,474,812	151,087,029	151,087,029	151,087,029	151,087,029	151,087,029	151,087,029
Tax Depreciation	-	-	-	-	5,665,764	10,906,973	10,088,081	9,332,646	8,631,602	7,964,949
Allowed Rate of Return	11.31%	11.31%	11.31%	11.31%	11.31%	11.31%	11.31%	11.31%	11.31%	11.31%
Book Depreciation expense total	-	-	-	-	5,029,939	7,101,090	7,101,090	7,101,090	7,101,090	7,101,090
Tax Depreciation expense total	-	-	-	-	5,665,764	10,906,973	10,088,081	9,332,646	8,631,602	7,964,949
Annual Property Tax Rate	0.1500%	0.1500%	0.1500%	0.1500%	0.1500%	0.1500%	0.1500%	0.1500%	0.1500%	0.1500%
Deferred Tax Balance	-	-	-	-	227,053	1,566,134	2,652,788	3,449,676	3,996,222	4,311,848
Revenue Recovery on Capital Expenditure to date	-	-	-	-	-	-	-	-	-	-
Eligible Plant, cumulative capital expenditures	-	12,967,870	54,354,740	103,474,812	151,087,029	151,087,029	151,087,029	151,087,029	151,087,029	151,087,029
Less: Refined Plant	-	-	-	-	(625,711)	(625,711)	(625,711)	(625,711)	(625,711)	(625,711)
Less: Accumulated Depreciation	-	-	-	-	(5,029,939)	(12,131,029)	(19,232,120)	(26,333,210)	(33,434,301)	(40,535,391)
Plus: Accumulated Depreciation on Refined Plant	-	-	-	-	550,727	550,727	550,727	550,727	550,727	550,727
Less: Deferred Tax Balance	-	-	-	-	(227,053)	(1,566,134)	(2,652,788)	(3,449,676)	(3,996,222)	(4,311,848)
Plus: Deferred Tax Balance on Refined Plant	-	-	-	-	29,169	29,169	29,169	29,169	29,169	29,169
Environmental Compliance Rate Base	-	12,967,870	54,354,740	103,474,812	145,784,222	137,324,051	129,156,306	121,258,327	113,610,691	106,193,975
Rate of return	11.31%	11.31%	11.31%	11.31%	11.31%	11.31%	11.31%	11.31%	11.31%	11.31%
Return on Environmental Compliance Rate Base	\$ -	\$ 1,467,023	\$ 6,149,017	\$ 11,705,850	\$ 16,482,209	\$ 15,535,131	\$ 14,611,134	\$ 13,717,655	\$ 12,852,487	\$ 12,013,462
Operating Expenses	-	-	-	-	6,437,015	9,640,391	9,833,199	10,029,863	10,230,460	10,435,069
Annual Depreciation expense	-	-	-	-	5,029,939	7,101,090	7,101,090	7,101,090	7,101,090	7,101,090
Less: Accumulated depreciation plant	-	-	-	-	(2,454,111)	(4,454,111)	(6,454,111)	(8,454,111)	(10,454,111)	(12,454,111)
Annual Property Tax expense	-	-	19,452	81,532	155,212	219,086	208,434	197,782	187,131	176,479
Total OE	\$ -	\$ -	\$ 19,452	\$ 81,532	\$ 11,619,715	\$ 16,958,116	\$ 17,140,272	\$ 17,326,285	\$ 17,516,230	\$ 17,710,188
Total E(m) - Project	-	1,467,023	6,168,469	11,767,392	28,111,924	32,493,247	31,751,406	31,043,940	30,366,727	29,723,650

**Revenue Requirements
Project 26 - LG&E**

	October									
	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
In-Service Mill Creek 3NPC										
CapEx - MC3 PM Control System - SAM Mitigation - SCR Turn-down	\$ 192,372	\$ 4,615,765	\$ 45,032,370	\$ 48,061,558	\$ 43,768,430	\$ 7,545,814	\$ -	\$ -	\$ -	\$ -
Accumulated Expenditures	\$ 192,372	\$ 4,808,137	\$ 49,840,507	\$ 98,902,065	\$ 142,670,495	\$ 150,216,309	\$ 150,216,309	\$ 150,216,309	\$ 150,216,309	\$ 150,216,309
Book Depreciation rate, per year	0.000%	0.000%	0.000%	0.000%	3.870%	3.870%	3.870%	3.870%	3.870%	3.870%
Tax Depreciation rate, per year	0.000%	0.000%	0.000%	0.000%	3.750%	7.219%	6.677%	6.177%	5.713%	5.285%
Income tax rate	35.71%	35.71%	35.71%	35.71%	35.71%	35.71%	35.71%	35.71%	35.71%	35.71%
Deferred Tax Balance	-	-	-	-	1,499,771	3,295,250	4,801,999	6,039,514	7,028,141	7,787,178
Book Accumulated Depreciation Balance	-	-	-	-	1,150,281	6,953,852	12,777,023	18,590,394	24,403,766	30,217,137
Unrecovered Investment - Book	192,372	4,808,137	49,840,507	98,902,065	142,670,495	150,216,309	150,216,309	150,216,309	150,216,309	150,216,309
Book Depreciation	-	-	-	-	1,150,281	5,813,371	5,813,371	5,813,371	5,813,371	5,813,371
Unrecovered Investment - Tax total	192,372	4,808,137	49,840,507	98,902,065	142,670,495	150,216,309	150,216,309	150,216,309	150,216,309	150,216,309
Tax Depreciation	-	-	-	-	5,350,144	10,844,115	10,029,943	9,278,861	8,581,858	7,938,932
Allowed Rate of Return	11.31%	11.31%	11.31%	11.31%	11.31%	11.31%	11.31%	11.31%	11.31%	11.31%
Book Depreciation expense total	-	-	-	-	1,150,281	5,813,371	5,813,371	5,813,371	5,813,371	5,813,371
Tax Depreciation expense total	-	-	-	-	5,350,144	10,844,115	10,029,943	9,278,861	8,581,858	7,938,932
Annual Property Tax Rate	0.1500%	0.1500%	0.1500%	0.1500%	0.1500%	0.1500%	0.1500%	0.1500%	0.1500%	0.1500%
Deferred Tax Balance	-	-	-	-	1,499,771	1,795,479	1,505,738	1,237,527	989,627	759,038
Revenue Recovery on Capital Expenditure to date										
Eligible Plant, cumulative capital expenditures	192,372	4,808,137	49,840,507	98,902,065	142,670,495	150,216,309	150,216,309	150,216,309	150,216,309	150,216,309
Less: Retired Plant	-	-	-	-	(10,458,472)	(10,458,472)	(10,458,472)	(10,458,472)	(10,458,472)	(10,458,472)
Less: Accumulated Depreciation	-	-	-	-	(1,150,281)	(6,953,852)	(12,777,023)	(18,590,394)	(24,403,766)	(30,217,137)
Plus: Accumulated Depreciation on Retired Plant	-	-	-	-	3,546,670	3,546,670	3,546,670	3,546,670	3,546,670	3,546,670
Less: Deferred Tax Balance	-	-	-	-	(1,499,771)	(3,295,250)	(4,801,999)	(6,039,514)	(7,028,141)	(7,787,178)
Plus: Deferred Tax Balance on Retired Plant	-	-	-	-	33,729	33,729	33,729	33,729	33,729	33,729
Environmental Compliance Rate Base	192,372	4,808,137	49,840,507	98,902,065	133,142,370	133,078,334	125,759,225	118,708,327	111,906,330	105,333,921
Rate of return	11.31%	11.31%	11.31%	11.31%	11.31%	11.31%	11.31%	11.31%	11.31%	11.31%
Return on Environmental Compliance Rate Base	\$ 21,763	\$ 543,933	\$ 5,638,393	\$ 11,188,546	\$ 15,052,067	\$ 15,054,823	\$ 14,226,830	\$ 13,429,180	\$ 12,659,687	\$ 11,916,166
Operating Expenses										
Annual Depreciation expense	-	-	1,693,407	3,454,550	4,645,582	12,749,152	13,004,135	13,264,218	13,529,502	13,800,092
Less: Depreciation on retired plant	-	-	-	-	(1,150,281)	(5,813,371)	(5,813,371)	(5,813,371)	(5,813,371)	(5,813,371)
Annual Property Tax expense	-	289	7,212	74,751	148,353	212,280	214,879	205,159	197,439	188,719
Total OE	\$ -	\$ 289	\$ 1,700,619	\$ 3,529,311	\$ 5,147,511	\$ 17,978,098	\$ 18,235,660	\$ 18,487,043	\$ 18,743,607	\$ 19,005,477
Total E(m) - Project	21,763	544,221	7,338,953	14,717,857	20,205,578	33,032,921	32,462,510	31,916,222	31,403,293	30,921,943

**Revenue Requirements
Project 26 - LG&E**

In-Service	November									
	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
Mill Creek 4MPC	1	2	3	4	5	6	7	8	9	10
CapEx - MCA PM Control System - SAM Mitigation - SCR Turn-down	\$ 5,376,845	\$ 54,419,721	\$ 58,845,099	\$ 39,657,052	\$ 9,115,060	\$ -	\$ -	\$ -	\$ -	\$ -
Accumulated Expenditures	\$ 5,376,845	\$ 59,796,566	\$ 118,641,665	\$ 158,298,717	\$ 167,413,776	\$ 167,413,776	\$ 167,413,776	\$ 167,413,776	\$ 167,413,776	\$ 167,413,776
Book Depreciation rate, per year	0.000%	0.000%	0.000%	3.850%	3.850%	3.850%	3.850%	3.850%	3.850%	3.850%
Tax Depreciation rate, per year	0.000%	0.000%	0.000%	3.750%	7.219%	6.677%	6.177%	5.713%	5.285%	4.888%
Income tax rate	35.71%	35.71%	35.71%	35.71%	35.71%	35.71%	35.71%	35.71%	35.71%	35.71%
Deferred Tax Balance	-	-	-	1,847,774	3,861,879	5,551,958	6,943,119	8,056,895	8,914,777	9,535,329
Book Accumulated Depreciation Balance	-	-	-	761,813	7,207,243	13,652,673	20,098,104	26,543,534	32,988,964	39,434,395
Unrecovered Investment - Book	5,376,845	59,796,566	118,641,665	158,298,717	167,413,776	167,413,776	167,413,776	167,413,776	167,413,776	167,413,776
Book Depreciation	-	-	-	761,813	6,445,430	6,445,430	6,445,430	6,445,430	6,445,430	6,445,430
Unrecovered Investment - Tax total	5,376,845	59,796,566	118,641,665	158,298,717	167,413,776	167,413,776	167,413,776	167,413,776	167,413,776	167,413,776
Tax Depreciation	-	-	-	5,936,202	12,085,601	11,178,218	10,341,149	9,564,348	8,847,818	8,183,185
Allowed Rate of Return	11.31%	11.31%	11.31%	11.31%	11.31%	11.31%	11.31%	11.31%	11.31%	11.31%
Book Depreciation expense total	-	-	-	761,813	6,445,430	6,445,430	6,445,430	6,445,430	6,445,430	6,445,430
Tax Depreciation expense total	-	-	-	5,936,202	12,085,601	11,178,218	10,341,149	9,564,348	8,847,818	8,183,185
Annual Property Tax Rate	0.1500%	0.1500%	0.1500%	0.1500%	0.1500%	0.1500%	0.1500%	0.1500%	0.1500%	0.1500%
Deferred Tax Balance	-	-	-	1,847,774	2,014,105	1,890,078	1,391,161	1,113,766	857,893	620,552
Revenue Recovery on Capital Expenditure to date										
Eligible Plant, cumulative capital expenditures	5,376,845	59,796,566	118,641,665	158,298,717	167,413,776	167,413,776	167,413,776	167,413,776	167,413,776	167,413,776
Less: Retired Plant	-	-	-	-	-	-	-	-	-	-
Less: Accumulated Depreciation	-	-	-	(761,813)	(7,207,243)	(13,652,673)	(20,098,104)	(26,543,534)	(32,988,964)	(39,434,395)
Plus: Accumulated Depreciation on Retired Plant	-	-	-	-	-	-	-	-	-	-
Less: Deferred Tax Balance	-	-	-	(1,847,774)	(3,861,879)	(5,551,958)	(6,943,119)	(8,056,895)	(8,914,777)	(9,535,329)
Plus: Deferred Tax Balance on Retired Plant	-	-	-	-	-	-	-	-	-	-
Environmental Compliance Rate Base	5,376,845	59,796,566	118,641,665	155,689,130	156,344,654	148,209,145	140,372,554	132,813,358	125,510,035	118,444,052
Rate of return	11.31%	11.31%	11.31%	11.31%	11.31%	11.31%	11.31%	11.31%	11.31%	11.31%
Return on Environmental Compliance Rate Base	\$ 609,269	\$ 6,772,703	\$ 13,321,638	\$ 17,612,727	\$ 17,695,884	\$ 16,786,534	\$ 15,880,000	\$ 15,024,847	\$ 14,196,640	\$ 13,395,283
Operating Expenses										
Annual Depreciation expense	-	-	-	3,611,316	15,160,250	15,463,455	15,772,725	16,088,179	16,409,943	16,738,141
Less: Depreciation on Retired Plant	-	-	-	-	-	-	-	-	-	-
Annual Property Tax expense	-	-	-	761,813	6,445,430	6,445,430	6,445,430	6,445,430	6,445,430	6,445,430
Total OE	-	-	-	8,065	8,065	8,065	8,065	8,065	8,065	8,065
Total E(m) - Project	609,269	6,772,703	13,311,333	22,163,818	39,528,871	38,915,730	37,779,430	37,265,318	36,784,492	

**Revenue Requirements
Project 27 - LG&E**

	November									
	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
In-Service					1	2	3	4	5	6
Trimble/PC										
Capital Expenditures - Project 27 - TC1 Baghouse										
Accumulated Expenditures	\$ -	\$ -	\$ 23,479,869	\$ 37,849,548	\$ 57,140,608	\$ 5,282,332	\$ -	\$ -	\$ -	\$ -
Book Depreciation rate, per year	0.000%	0.000%	0.000%	0.000%	3.620%	3.620%	3.620%	3.620%	3.620%	3.620%
Tax Depreciation rate, per year	0.000%	0.000%	0.000%	0.000%	3.750%	7.219%	6.677%	6.177%	5.713%	5.285%
Income tax rate	35.71%	35.71%	35.71%	35.71%	35.71%	35.71%	35.71%	35.71%	35.71%	35.71%
Deferred Tax Balance	-	-	-	-	1,395,029	2,985,498	4,336,446	5,466,435	6,391,372	7,127,169
Book Accumulated Depreciation Balance	-	-	-	-	536,077	5,015,912	8,495,748	13,975,583	18,455,418	22,935,254
Unrecovered Investment - Book	-	-	23,479,869	61,329,417	118,470,025	123,752,357	123,752,357	123,752,357	123,752,357	123,752,357
Book Depreciation	-	-	-	-	536,077	4,479,835	4,479,835	4,479,835	4,479,835	4,479,835
Unrecovered Investment - Tax total	-	-	-	-	118,470,025	123,752,357	123,752,357	123,752,357	123,752,357	123,752,357
Tax Depreciation	-	-	-	-	4,442,626	8,933,683	8,262,945	7,644,183	7,069,972	6,540,312
Allowed Rate of Return	11.31%	11.31%	11.31%	11.31%	11.31%	11.31%	11.31%	11.31%	11.31%	11.31%
Book Depreciation expense total	-	-	-	-	536,077	4,479,835	4,479,835	4,479,835	4,479,835	4,479,835
Tax Depreciation expense total	-	-	-	-	4,442,626	8,933,683	8,262,945	7,644,183	7,069,972	6,540,312
Annual Property Tax Rate	0.1500%	0.1500%	0.1500%	0.1500%	0.1500%	0.1500%	0.1500%	0.1500%	0.1500%	0.1500%
Deferred Tax Balance	-	-	-	-	1,395,029	1,590,469	1,350,948	1,129,989	924,938	735,796
Revenue Recovery on Capital Expenditure to date										
Eligible Plant, cumulative capital expenditures	-	-	23,479,869	61,329,417	118,470,025	123,752,357	123,752,357	123,752,357	123,752,357	123,752,357
Less: Retired Plant	-	-	-	-	-	-	-	-	-	-
Less: Accumulated Depreciation	-	-	-	-	(536,077)	(5,015,912)	(8,495,748)	(13,975,583)	(18,455,418)	(22,935,254)
Plus: Accumulated Depreciation on Retired Plant	-	-	-	-	-	-	-	-	-	-
Less: Deferred Tax Balance	-	-	-	-	(1,395,029)	(2,985,498)	(4,336,446)	(5,466,435)	(6,391,372)	(7,127,169)
Plus: Deferred Tax Balance on Retired Plant	-	-	-	-	-	-	-	-	-	-
Environmental Compliance Rate Base	-	-	23,479,869	61,329,417	116,538,920	115,750,947	109,920,164	104,310,340	98,905,567	93,669,935
Rate of return	11.31%	11.31%	11.31%	11.31%	11.31%	11.31%	11.31%	11.31%	11.31%	11.31%
Operating Expenses										
Annual Depreciation expense	-	-	-	-	3,732,365	7,614,024	7,766,305	7,921,631	8,080,064	8,241,665
Less depreciation on retired plant	-	-	-	-	-	-	-	-	-	-
Annual Property Tax expense	-	-	-	-	536,077	4,479,835	4,479,835	4,479,835	4,479,835	4,479,835
Total OE	-	-	-	-	35,220	175,901	178,105	171,395	164,665	157,945
Total E(m) - Project	-	-	2,656,220	6,973,265	17,544,196	25,365,379	24,859,241	24,373,222	23,913,506	23,478,356

**Revenue Requirements Summary
2011 Amended Plan - KU**

Project 29	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
Brown Landfill (Phase I)										
Revenue Requirement										
Eligible Plant	7,887,735	34,610,113	58,674,420	58,674,420	58,674,420	58,674,420	58,674,420	58,674,420	58,674,420	58,674,420
Less: Retired Plant	-	-	-	-	-	-	-	-	-	-
Less: Accumulated Depreciation	-	-	-	(1,574,430)	(3,217,314)	(4,860,198)	(6,503,082)	(8,145,965)	(9,788,846)	(11,431,733)
Plus: Accumulated Depreciation on retired plant	-	-	-	-	-	-	-	-	-	-
Less: Deferred Tax Balance	-	-	-	(223,495)	(1,149,392)	(1,961,725)	(2,669,296)	(3,279,646)	(3,800,319)	(4,237,910)
Plus: Deferred Tax Balance on retired plant	-	-	-	-	-	-	-	-	-	-
Environmental Compliance Rate Base	7,887,735	34,610,113	58,674,420	56,876,495	54,307,714	51,852,497	49,502,043	47,248,809	45,085,252	43,004,677
Rate of return	11.04%	11.04%	11.04%	11.04%	11.04%	11.04%	11.04%	11.04%	11.04%	11.04%
\$	870,487	\$ 3,819,556	\$ 6,475,281	\$ 6,276,863	\$ 5,993,373	\$ 5,722,417	\$ 5,463,022	\$ 5,214,356	\$ 4,975,587	\$ 4,745,998
Operating expenses										
Annual Depreciation expense	-	-	-	2,813,772	2,898,185	2,985,131	3,074,685	3,166,925	3,261,933	3,359,791
Less depreciation on retired plant	-	-	-	1,574,430	1,642,884	1,642,884	1,642,884	1,642,884	1,642,884	1,642,884
Annual Property Tax expense	-	-	-	-	-	-	-	-	-	-
Total OE	\$ -	\$ 11,832	\$ 51,915	\$ 88,012	\$ 85,650	\$ 83,186	\$ 80,721	\$ 78,257	\$ 75,793	\$ 73,328
Total E(m)	870,487	3,831,387	6,527,196	10,753,077	10,620,092	10,433,617	10,261,312	10,102,422	9,956,196	9,822,001

**Revenue Requirements Summary
2011 Amended Plan - KU**

Project 34	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
BR Air Compliance - All Units - PM Control Systems										
Revenue Requirement										
Eligible Plant	5,224,347	71,624,419	196,530,009	307,550,104	343,785,964	343,785,964	343,785,964	343,785,964	343,785,964	343,785,964
Less: Retired Plant	-	-	-	-	-	-	-	-	-	-
Less: Accumulated Depreciation	-	-	-	(4,247,407)	(13,089,386)	(23,159,043)	(33,228,699)	(43,288,356)	(53,368,012)	(63,437,668)
Plus: Accumulated Depreciation on retired plant	-	-	-	-	-	-	-	-	-	-
Less: Deferred Tax Balance	-	-	-	(1,521,248)	(5,777,851)	(10,605,360)	(14,801,503)	(18,412,981)	(21,483,990)	(24,054,674)
Plus: Deferred Tax Balance on retired plant	-	-	-	-	-	-	-	-	-	-
Environmental Compliance Rate Base	5,224,347	71,624,419	196,530,009	301,781,449	324,918,727	310,021,561	295,755,762	282,074,628	268,833,962	256,293,622
Rate of return	11.04%	11.04%	11.04%	11.04%	11.04%	11.04%	11.04%	11.04%	11.04%	11.04%
	\$ 576,556	\$ 7,904,437	\$ 21,688,958	\$ 33,304,457	\$ 35,857,876	\$ 34,213,832	\$ 32,639,465	\$ 31,129,621	\$ 29,679,424	\$ 28,284,442
Operating expenses										
Annual Depreciation expense	-	-	-	7,536,179	16,368,110	19,085,903	19,467,621	19,856,973	20,254,113	20,659,195
Less depreciation on retired plant	-	-	-	4,247,407	8,841,979	10,069,656	10,069,656	10,069,656	10,069,656	10,069,656
Annual Property Tax expense	-	-	-	294,795	454,954	496,045	480,940	465,836	450,731	435,627
Total OE	-	7,837	107,437	12,078,381	25,665,043	29,651,604	30,018,217	30,392,465	30,774,500	31,164,478
Total E(m)	576,556	7,912,273	21,796,395	45,382,838	61,522,919	63,865,435	62,657,682	61,522,087	60,453,924	59,448,920

**Revenue Requirements Summary
2011 Amended Plan - KU**

Project 35	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
GH Air Compliance - All Units - PM Control Systems										
Revenue Requirement										
Eligible Plant	5,094,166	101,828,630	299,923,984	530,338,048	698,652,348	711,534,820	711,534,820	711,534,820	711,534,820	711,534,820
Less: Retired Plant	-	-	-	-	-	-	-	-	-	-
Plus: Accumulated Depreciation	-	-	-	(4,400,802)	(15,808,453)	(36,310,719)	(56,812,985)	(77,315,251)	(97,817,517)	(118,319,783)
Plus: Accumulated Depreciation on retired plant	-	-	-	-	-	-	-	-	-	-
Less: Deferred Tax Balance	-	-	-	(2,741,380)	(12,096,178)	(22,481,196)	(31,538,360)	(39,367,343)	(46,059,617)	(51,700,784)
Plus: Deferred Tax Balance on retired plant	-	-	-	-	-	-	-	-	-	-
Environmental Compliance Rate Base	5,094,166	101,828,630	299,923,984	523,195,866	670,747,717	652,742,905	623,183,475	594,852,226	567,657,666	541,514,253
Rate of return	11.04%	11.04%	11.04%	11.04%	11.04%	11.04%	11.04%	11.04%	11.04%	11.04%
	\$ 562,190	\$ 11,237,759	\$ 33,099,468	\$ 57,739,646	\$ 74,023,398	\$ 72,036,395	\$ 66,774,231	\$ 65,647,608	\$ 62,646,431	\$ 59,761,255
Operating expenses										
Annual Depreciation expense	-	8,692	8,229,481	25,061,610	41,503,865	64,806,127	66,102,250	67,424,295	68,772,781	70,148,237
Less depreciation on retired plant	-	-	-	4,400,802	11,407,651	20,502,266	20,502,266	20,502,266	20,502,266	20,502,266
Annual Property Tax expense	-	7,641	152,743	449,886	788,906	1,024,266	1,012,836	982,063	951,329	920,576
Total OE	\$ -	\$ 16,333	\$ 8,382,224	\$ 29,912,298	\$ 53,700,423	\$ 86,332,659	\$ 87,617,352	\$ 88,908,644	\$ 90,226,376	\$ 91,571,078
Total E(m)	562,190	11,254,092	41,481,691	87,651,944	127,723,820	158,369,055	156,391,583	154,556,251	152,872,807	151,332,333

**Revenue Requirements Summary
2011 Amended Plan - KU**

	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
Total E(m) - All KU Projects	2,009,233	22,997,753	69,805,282	143,787,858	199,866,832	232,668,107	229,310,577	226,180,760	223,282,928	220,603,254
	1,712,578	19,012,967	60,245,001	123,740,224	177,214,254	210,444,215	207,489,499	204,738,062	202,195,965	199,850,703
Total Revenue Requirements										
Project 29	870,487	3,831,387	6,527,196	10,753,077	10,620,092	10,433,617	10,261,312	10,102,422	9,956,196	9,822,001
Project 34	576,556	7,912,273	21,796,395	45,382,838	61,522,919	63,865,435	62,657,682	61,522,087	60,453,924	59,448,920
Project 35	562,190	11,254,092	41,481,691	87,651,944	127,723,820	158,369,055	156,391,583	154,556,251	152,872,807	151,332,333
Total	2,009,233	22,997,753	69,805,282	143,787,858	199,866,832	232,668,107	229,310,577	226,180,760	223,282,928	220,603,254
	86.99%	86.99%	86.99%	86.99%	86.99%	86.99%	86.99%	86.99%	86.99%	86.99%
12 Month Average Jurisdictional Ratio										
Jurisdictional Allocation	1,747,798	20,005,362	60,722,452	125,078,661	173,860,826	202,394,108	199,473,449	196,750,873	194,230,098	191,899,094
Forecasted 12-Month Retail Revenue	1,251,944,184	1,364,734,889	1,442,296,068	1,505,216,494	1,559,590,578	1,654,718,522	1,721,201,709	1,811,131,354	1,963,765,781	2,028,216,792
Billing Factor	0.14%	1.47%	4.21%	8.31%	11.15%	12.23%	11.59%	10.86%	9.89%	9.46%
KU Residential Bill Impact										
Customer Charge	\$8.50	\$8.50	\$8.50	\$8.50	\$8.50	\$8.50	\$8.50	\$8.50	\$8.50	\$8.50
Energy - 1,000 Kwh @ \$0.06805	\$68.05	\$68.05	\$68.05	\$68.05	\$68.05	\$68.05	\$68.05	\$68.05	\$68.05	\$68.05
FAC billings (12/1/201 factor - \$-0.0016/KWh)	-\$1.60	-\$1.60	-\$1.60	-\$1.60	-\$1.60	-\$1.60	-\$1.60	-\$1.60	-\$1.60	-\$1.60
DSM billings (12/1/201 factor - \$0.00243/KWh)	\$2.43	\$2.43	\$2.43	\$2.43	\$2.43	\$2.43	\$2.43	\$2.43	\$2.43	\$2.43
ECR billings (12/1/201 factor: 2.55%)	\$1.97	\$1.97	\$1.97	\$1.97	\$1.97	\$1.97	\$1.97	\$1.97	\$1.97	\$1.97
Additional ECR factor	\$0.11	\$1.13	\$3.26	\$6.43	\$8.63	\$9.46	\$8.97	\$8.41	\$7.65	\$7.32

**Summary Cash Flow
Cash Flow for 2011 thru 2020
2011 KU Amended ECR Plan**

	1	2	3	4	5	6	7	8	9	10	
	BR Landfill	BR Air	BR Air	BR Air	BR Air	GH Air	GH Air	GH Air	Compliance -	Compliance -	
Date	(Project 29)	BR1 (Project 34)	Compliance -	BR2 (Project 34)	Compliance - BR3	GH Air	Compliance - GH1	GH2	GH3 (Project 35)	GH4 (Project 35)	
										Total	
2010	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
2011	\$ 7,987,735	\$ 2,536,274	\$ 2,688,073	\$ 2,688,073	\$ -	\$ 2,178,929	\$ 148,784	\$ 1,307,716	\$ 1,458,737	\$ -	\$ 18,206,248
2012	\$ 26,722,378	\$ 30,841,093	\$ 33,382,705	\$ 33,382,705	\$ 2,176,274	\$ 50,248,800	\$ 37,354,857	\$ 4,809,001	\$ 4,321,807	\$ -	\$ 189,856,914
2013	\$ 24,064,307	\$ 46,546,567	\$ 50,067,464	\$ 50,067,464	\$ 28,291,560	\$ 66,924,592	\$ 48,163,861	\$ 47,890,171	\$ 35,116,729	\$ -	\$ 347,065,251
2014	\$ -	\$ 29,295,115	\$ 31,507,055	\$ 31,507,055	\$ 50,217,924	\$ 44,857,567	\$ 72,191,638	\$ 56,057,325	\$ 57,307,535	\$ -	\$ 341,434,159
2015	\$ -	\$ -	\$ -	\$ -	\$ 36,235,860	\$ -	\$ 6,693,304	\$ 84,049,087	\$ 77,571,909	\$ -	\$ 204,550,160
2016	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 3,899,032	\$ 8,984,440	\$ -	\$ 12,882,472
2017	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
2018	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
	\$ 58,674,420	\$ 109,219,049	\$ 117,645,297	\$ 116,921,618	\$ 164,209,888	\$ 164,552,444	\$ 198,011,331	\$ 184,761,157	\$ -	\$ 1,113,995,204	

Revenue Requirements Project 29 - KU

In-Service	January							2020		
	2011	2012	2013	2014	2015	2016	2017		2018	2019
	1	2	3	4	5	6	7			
Capital Expenditures - Project 29 - Brown Landfill - Phase II	\$ 7,887,735	\$ 26,722,378	\$ 24,064,307	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Accumulated Expenditures	\$ 7,887,735	\$ 34,610,113	\$ 58,674,420	\$ 58,674,420	\$ 58,674,420	\$ 58,674,420	\$ 58,674,420	\$ 58,674,420	\$ 58,674,420	\$ 58,674,420
Book Depreciation rate, per year	0.000%	0.000%	0.000%	2.800%	2.800%	2.800%	2.800%	2.800%	2.800%	2.800%
Tax Depreciation rate, per year	0.000%	0.000%	0.000%	3.750%	7.219%	6.677%	6.177%	5.713%	5.285%	4.888%
Income tax rate	35.71%	35.71%	35.71%	35.71%	35.71%	35.71%	35.71%	35.71%	35.71%	35.71%
Deferred Tax Balance	-	-	-	223,495	1,149,392	1,961,725	2,669,296	3,279,646	3,800,319	4,237,810
Book Accumulated Depreciation Balance	-	-	-	1,574,430	3,217,314	4,860,198	6,503,082	8,145,965	9,788,849	11,431,733
Unrecovered Investment - Book	7,887,735	34,610,113	58,674,420	58,674,420	58,674,420	58,674,420	58,674,420	58,674,420	58,674,420	58,674,420
Book Depreciation	-	-	-	1,574,430	1,642,884	1,642,884	1,642,884	1,642,884	1,642,884	1,642,884
Unrecovered Investment - Tax total	7,887,735	34,610,113	58,674,420	58,674,420	58,674,420	58,674,420	58,674,420	58,674,420	58,674,420	58,674,420
Tax Depreciation	-	-	-	2,200,291	4,235,706	3,917,691	3,624,319	3,352,070	3,100,943	2,868,006
Allowed Rate of Return	11.04%	11.04%	11.04%	11.04%	11.04%	11.04%	11.04%	11.04%	11.04%	11.04%
Book Depreciation expense total	-	-	-	1,574,430	1,642,884	1,642,884	1,642,884	1,642,884	1,642,884	1,642,884
Tax Depreciation expense total	-	-	-	2,200,291	4,235,706	3,917,691	3,624,319	3,352,070	3,100,943	2,868,006
Annual Property Tax Rate	0.1500%	0.1500%	0.1500%	0.1500%	0.1500%	0.1500%	0.1500%	0.1500%	0.1500%	0.1500%
Deferred Tax Balance	-	-	-	223,495	925,897	812,334	707,570	610,350	520,673	437,491
Revenue Recovery on Capital Expenditure to date	7,887,735	34,610,113	58,674,420	58,674,420	58,674,420	58,674,420	58,674,420	58,674,420	58,674,420	58,674,420
Eligible Plant, cumulative capital expenditures	-	-	-	-	-	-	-	-	-	-
Less: Retired Plant	-	-	-	(1,574,430)	(3,217,314)	(4,860,198)	(6,503,082)	(8,145,965)	(9,788,849)	(11,431,733)
Less: Accumulated Depreciation	-	-	-	-	-	-	-	-	-	-
Plus: Accumulated Depreciation on Retired Plant	-	-	-	(223,495)	(1,149,392)	(1,961,725)	(2,669,296)	(3,279,646)	(3,800,319)	(4,237,810)
Less: Deferred Tax Balance	-	-	-	-	-	-	-	-	-	-
Plus: Deferred Tax Balance on Retired Plant	-	-	-	-	-	-	-	-	-	-
Environmental Compliance Rate Base	7,887,735	34,610,113	58,674,420	56,876,495	54,307,714	51,852,497	49,502,043	47,248,809	45,085,252	43,004,877
Rate of return	11.04%	11.04%	11.04%	11.04%	11.04%	11.04%	11.04%	11.04%	11.04%	11.04%
Return on Environmental Compliance Rate Base	\$ 870,487	\$ 3,819,556	\$ 6,475,281	\$ 6,276,863	\$ 5,893,373	\$ 5,722,417	\$ 5,463,022	\$ 5,214,356	\$ 4,976,587	\$ 4,745,899
Operating Expenses	-	-	-	2,813,772	2,898,185	2,985,131	3,074,665	3,166,925	3,261,933	3,359,791
Annual Depreciation expense	-	-	-	1,574,430	1,642,884	1,642,884	1,642,884	1,642,884	1,642,884	1,642,884
Less depreciation on retired plant	-	-	-	-	-	-	-	-	-	-
Annual Property Tax expense	-	-	-	86,012	65,650	83,186	80,721	76,257	75,793	73,328
Total OE	-	-	-	4,476,214	4,626,719	4,771,200	4,799,290	4,888,066	4,990,609	5,076,003
Total E(m) - Project	870,487	3,851,387	6,527,196	10,753,077	10,620,092	10,433,917	10,261,312	10,102,422	9,956,196	9,822,001

**Revenue Requirements
Project 34 - KU**

	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
				May						
In-Service				1	2	3	4	5	6	7
Brown 1										
CapEx - BRT PM Control System - SAM Mitigation	\$ 2,536,274	\$ 30,841,093	\$ 46,546,567	\$ 29,295,115	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Accumulated Expenditures	\$ 2,536,274	\$ 33,377,367	\$ 79,923,934	\$ 109,219,049	\$ 109,219,049	\$ 109,219,049	\$ 109,219,049	\$ 109,219,049	\$ 109,219,049	\$ 109,219,049
Book Depreciation rate, per year	0.000%	0.000%	0.000%	2.980%	2.980%	2.980%	2.980%	2.980%	2.980%	2.980%
Tax Depreciation rate, per year	0.000%	0.000%	0.000%	3.750%	7.219%	6.67%	6.177%	5.713%	5.285%	4.888%
Income tax rate	35.71%	35.71%	35.71%	35.71%	35.71%	35.71%	35.71%	35.71%	35.71%	35.71%
Deferred Tax Balance	-	-	-	736,165	2,389,465	3,831,373	5,078,271	6,144,199	7,043,198	7,787,359
Book Accumulated Depreciation Balance	-	-	-	2,034,205	5,288,932	8,543,660	11,798,388	15,053,115	18,307,843	21,562,571
Unrecovered Investment - Book	2,536,274	33,377,367	79,923,934	109,219,049	109,219,049	109,219,049	109,219,049	109,219,049	109,219,049	109,219,049
Book Depreciation	-	-	-	2,034,205	3,254,728	3,254,728	3,254,728	3,254,728	3,254,728	3,254,728
Unrecovered Investment - Tax total	2,536,274	33,377,367	79,923,934	109,219,049	109,219,049	109,219,049	109,219,049	109,219,049	109,219,049	109,219,049
Tax Depreciation	-	-	-	4,095,714	7,884,523	7,292,556	6,746,461	6,239,684	5,772,227	5,336,627
Allowed Rate of Return	11.04%	11.04%	11.04%	11.04%	11.04%	11.04%	11.04%	11.04%	11.04%	11.04%
Book Depreciation expense total	-	-	-	2,034,205	3,254,728	3,254,728	3,254,728	3,254,728	3,254,728	3,254,728
Tax Depreciation expense total	-	-	-	4,095,714	7,884,523	7,292,556	6,746,461	6,239,684	5,772,227	5,336,627
Annual Property Tax Rate	0.1500%	0.1500%	0.1500%	0.1500%	0.1500%	0.1500%	0.1500%	0.1500%	0.1500%	0.1500%
Deferred Tax Balance	-	-	-	736,165	1,653,300	1,441,908	1,246,898	1,065,928	898,999	744,160
Revenue Recovery on Capital Expenditure to date										
Eligible Plant, cumulative capital expenditures	2,536,274	33,377,367	79,923,934	109,219,049	109,219,049	109,219,049	109,219,049	109,219,049	109,219,049	109,219,049
Less: Retired Plant	-	-	-	-	-	-	-	-	-	-
Less: Accumulated Depreciation	-	-	-	(2,034,205)	(5,288,932)	(8,543,660)	(11,798,388)	(15,053,115)	(18,307,843)	(21,562,571)
Plus: Accumulated Depreciation on Retired Plant	-	-	-	-	-	-	-	-	-	-
Less: Deferred Tax Balance	-	-	-	(736,165)	(2,389,465)	(3,831,373)	(5,078,271)	(6,144,199)	(7,043,198)	(7,787,359)
Plus: Deferred Tax Balance on Retired Plant	-	-	-	-	-	-	-	-	-	-
Environmental Compliance Rate Base	2,536,274	33,377,367	79,923,934	106,448,679	101,540,651	96,844,015	92,342,390	88,021,734	83,868,007	79,869,119
Rate of return	11.04%	11.04%	11.04%	11.04%	11.04%	11.04%	11.04%	11.04%	11.04%	11.04%
Return on Environmental Compliance Rate Base	\$ 279,902	\$ 3,683,510	\$ 8,820,367	\$ 11,747,625	\$ 11,205,978	\$ 10,687,659	\$ 10,190,862	\$ 9,714,037	\$ 9,255,633	\$ 8,814,318
Operating Expenses										
Annual Depreciation expense	-	-	-	2,483,343	4,809,135	4,905,317	5,003,424	5,103,492	5,205,562	5,309,673
Less: Depreciation on retired plant	-	-	-	2,034,205	3,254,728	3,254,728	3,254,728	3,254,728	3,254,728	3,254,728
Annual Property Tax expense	-	-	-	-	-	-	-	-	-	-
Total OE	-	\$ 3,804	\$ 50,066	\$ 4,637,434	\$ 8,224,640	\$ 8,315,940	\$ 8,409,164	\$ 8,504,351	\$ 8,601,538	\$ 8,700,768
Total E(m) - Project	279,902	3,687,315	8,870,433	16,385,059	19,430,617	19,003,599	18,600,028	18,216,387	17,857,172	17,515,086

**Revenue Requirements
Project 34 - KU**

In-Service Brown 2	April									
	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
	1	2	3	4	5	6	7			
CapEx - BR2 PM Control System - SAM Mitigation				\$ 31,507,055	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Accumulated Expenditures	\$ 2,688,073	\$ 33,382,705	\$ 50,067,464	\$ 117,645,297	\$ 117,645,297	\$ 117,645,297	\$ 117,645,297	\$ 117,645,297	\$ 117,645,297	\$ 117,645,297
Book Depreciation rate, per year	0.000%	0.000%	0.000%	3.010%	3.010%	3.010%	3.010%	3.010%	3.010%	3.010%
Tax Depreciation rate, per year	0.000%	0.000%	0.000%	3.750%	7.219%	6.677%	6.177%	5.713%	5.285%	4.888%
Income tax rate	35.71%	35.71%	35.71%	35.71%	35.71%	35.71%	35.71%	35.71%	35.71%	35.71%
Deferred Tax Balance	-	-	-	785,083	2,553,332	4,093,880	5,424,373	6,559,934	7,515,687	8,304,656
Book Accumulated Depreciation Balance	-	-	-	2,213,202	5,754,326	9,295,449	12,836,573	16,377,696	19,918,819	23,459,943
Unrecovered Investment - Book	2,688,073	36,070,778	86,138,242	117,645,297	117,645,297	117,645,297	117,645,297	117,645,297	117,645,297	117,645,297
Book Depreciation	-	-	-	2,213,202	3,541,123	3,541,123	3,541,123	3,541,123	3,541,123	3,541,123
Unrecovered Investment - Tax total	2,688,073	36,070,778	86,138,242	117,645,297	117,645,297	117,645,297	117,645,297	117,645,297	117,645,297	117,645,297
Tax Depreciation	-	-	-	4,411,699	8,492,814	7,855,177	7,266,950	6,721,076	6,217,554	5,750,502
Allowed Rate of Return	11.04%	11.04%	11.04%	11.04%	11.04%	11.04%	11.04%	11.04%	11.04%	11.04%
Book Depreciation expense total	-	-	-	2,213,202	3,541,123	3,541,123	3,541,123	3,541,123	3,541,123	3,541,123
Tax Depreciation expense total	-	-	-	4,411,699	8,492,814	7,855,177	7,266,950	6,721,076	6,217,554	5,750,502
Annual Property Tax Rate	0.1500%	0.1500%	0.1500%	0.1500%	0.1500%	0.1500%	0.1500%	0.1500%	0.1500%	0.1500%
Deferred Tax Balance	-	-	-	785,083	1,768,249	1,540,548	1,330,493	1,135,561	955,753	788,869
Revenue Recovery on Capital Expenditure to date				117,645,297	117,645,297	117,645,297	117,645,297	117,645,297	117,645,297	117,645,297
Eligible Plant, cumulative capital expenditures	2,688,073	36,070,778	86,138,242	117,645,297	117,645,297	117,645,297	117,645,297	117,645,297	117,645,297	117,645,297
Less: Retired Plant	-	-	-	-	-	-	-	-	-	-
Less: Accumulated Depreciation	-	-	-	(2,213,202)	(5,754,326)	(9,295,449)	(12,836,573)	(16,377,696)	(19,918,819)	(23,459,943)
Plus: Accumulated Depreciation on Retired Plant	-	-	-	-	-	-	-	-	-	-
Less: Deferred Tax Balance	-	-	-	(785,083)	(2,553,332)	(4,093,880)	(5,424,373)	(6,559,934)	(7,515,687)	(8,304,656)
Plus: Deferred Tax Balance on Retired Plant	-	-	-	-	-	-	-	-	-	-
Environmental Compliance Rate Base	2,688,073	36,070,778	86,138,242	114,647,012	109,337,640	104,255,968	99,384,352	94,707,668	90,210,781	85,860,698
Rate of return	11.04%	11.04%	11.04%	11.04%	11.04%	11.04%	11.04%	11.04%	11.04%	11.04%
Return on Environmental Compliance Rate Base	\$ 296,654	\$ 3,980,754	\$ 9,505,175	\$ 12,652,390	\$ 12,066,450	\$ 11,505,639	\$ 10,988,010	\$ 10,451,893	\$ 9,955,620	\$ 9,477,753
Operating Expenses				7,009,293	7,149,479	7,292,469	7,438,318	7,587,085	7,735,852	7,884,619
Annual Depreciation expense	-	-	-	2,213,202	3,541,123	3,541,123	3,541,123	3,541,123	3,541,123	3,541,123
Less: depreciation on retired plant	-	-	-	-	-	-	-	-	-	-
Annual Property Tax expense	-	-	-	173,148	167,836	162,525	157,213	151,901	146,590	141,279
Total OE	\$ -	\$ 4,032	\$ 54,106	\$ 7,395,245	\$ 10,586,128	\$ 10,716,253	\$ 10,853,128	\$ 10,980,805	\$ 11,131,343	\$ 11,274,798
Total E(m) - Project	296,654	3,984,766	9,560,281	20,047,635	22,652,578	22,223,892	21,821,137	21,442,698	21,066,963	20,752,551

**Revenue Requirements
Project 34 - KU**

In-Service	May									
	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
					1	2	3	4	5	6
CapEx - BR3 PM Control Systems	\$ -	\$ 2,176,274	\$ 28,291,560	\$ 50,217,924	\$ 36,235,860	\$ -	\$ -	\$ -	\$ -	\$ -
Accumulated Expenditures	\$ -	\$ 2,176,274	\$ 30,467,834	\$ 80,685,758	\$ 116,921,618	\$ 116,921,618	\$ 116,921,618	\$ 116,921,618	\$ 116,921,618	\$ 116,921,618
Book Depreciation rate, per year	0.000%	0.000%	0.000%	0.000%	2.800%	2.800%	2.800%	2.800%	2.800%	2.800%
Tax Depreciation rate, per year	0.000%	0.000%	0.000%	0.000%	3.750%	7.219%	6.677%	6.177%	5.713%	5.285%
Income tax rate	35.71%	35.71%	35.71%	35.71%	35.71%	35.71%	35.71%	35.71%	35.71%	35.71%
Deferred Tax Balance	-	-	-	-	835,054	2,660,106	4,298,659	5,708,848	6,925,104	7,962,659
Book Accumulated Depreciation Balance	-	-	-	-	2,046,128	5,319,934	8,593,739	11,867,544	15,141,350	18,415,155
Unrecovered Investment - Book	-	2,176,274	30,467,834	80,685,758	116,921,618	116,921,618	116,921,618	116,921,618	116,921,618	116,921,618
Book Depreciation	-	-	-	-	2,046,128	3,273,805	3,273,805	3,273,805	3,273,805	3,273,805
Unrecovered Investment - Tax total	-	2,176,274	30,467,834	80,685,758	116,921,618	116,921,618	116,921,618	116,921,618	116,921,618	116,921,618
Tax Depreciation	-	-	-	-	4,384,561	8,440,572	7,806,656	7,222,248	6,679,732	6,178,308
Allowed Rate of Return	11.04%	11.04%	11.04%	11.04%	11.04%	11.04%	11.04%	11.04%	11.04%	11.04%
Book Depreciation expense total	-	-	-	-	2,046,128	3,273,805	3,273,805	3,273,805	3,273,805	3,273,805
Tax Depreciation expense total	-	-	-	-	4,384,561	8,440,572	7,806,656	7,222,248	6,679,732	6,178,308
Annual Property Tax Rate	0.1500%	0.1500%	0.1500%	0.1500%	0.1500%	0.1500%	0.1500%	0.1500%	0.1500%	0.1500%
Deferred Tax Balance	-	-	-	-	835,054	1,845,052	1,618,753	1,409,989	1,216,256	1,037,555
Revenue Recovery on Capital Expenditure to date										
Eligible Plant, cumulative capital expenditures	-	2,176,274	30,467,834	80,685,758	116,921,618	116,921,618	116,921,618	116,921,618	116,921,618	116,921,618
Less: Retired Plant	-	-	-	-	-	-	-	-	-	-
Plus: Accumulated Depreciation	-	-	-	-	(2,046,128)	(5,319,934)	(8,593,739)	(11,867,544)	(15,141,350)	(18,415,155)
Plus: Accumulated Depreciation on Retired Plant	-	-	-	-	-	-	-	-	-	-
Less: Deferred Tax Balance	-	-	-	-	(835,054)	(2,660,106)	(4,298,659)	(5,708,848)	(6,925,104)	(7,962,659)
Plus: Deferred Tax Balance on Retired Plant	-	-	-	-	-	-	-	-	-	-
Environmental Compliance Rate Base	-	2,176,274	30,467,834	80,685,758	114,040,436	108,921,578	104,029,020	99,345,226	94,855,164	90,543,804
Rate of return	11.04%	11.04%	11.04%	11.04%	11.04%	11.04%	11.04%	11.04%	11.04%	11.04%
Return on Environmental Compliance Rate Base	\$ -	\$ 240,173	\$ 3,352,416	\$ 8,904,442	\$ 12,585,448	\$ 12,020,533	\$ 11,460,593	\$ 10,963,692	\$ 10,468,171	\$ 9,992,371
Operating Expenses										
Annual Depreciation expense	-	-	-	-	4,687,119	7,171,292	7,314,718	7,461,072	7,610,232	7,762,437
Less: Depreciation on Retired Plant	-	-	-	-	2,046,128	3,273,805	3,273,805	3,273,805	3,273,805	3,273,805
Annual Property Tax expense	-	-	-	3,264	45,702	121,029	172,313	167,403	162,492	157,581
Total OE	\$ -	\$ -	\$ 3,264	\$ 45,702	\$ 6,854,276	\$ 10,617,410	\$ 10,755,926	\$ 10,897,309	\$ 11,041,619	\$ 11,188,913
Total E(m) - Project	-	240,173	3,365,690	8,950,144	19,439,724	22,637,944	22,236,519	21,861,001	21,509,789	21,161,284

**Revenue Requirements
Project 35 - KU**

In-Service Client 1	May									
	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
CapEx - GH1 PM Control Systems-SAM Mitigation-SCR Turn-down	\$ 2,178,929	\$ 50,248,800	\$ 66,924,592	\$ 44,857,567	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Accumulated Expenditures	\$ 2,178,929	\$ 52,427,728	\$ 119,352,320	\$ 164,209,888	\$ 164,209,888	\$ 164,209,888	\$ 164,209,888	\$ 164,209,888	\$ 164,209,888	\$ 164,209,888
Book Depreciation rate, per year	0.000%	0.000%	0.000%	3.840%	3.840%	3.840%	3.840%	3.840%	3.840%	3.840%
Tax Depreciation rate, per year	0.000%	0.000%	0.000%	3.750%	7.219%	6.877%	6.177%	5.713%	5.295%	4.899%
Income tax rate	35.71%	35.71%	35.71%	35.71%	35.71%	35.71%	35.71%	35.71%	35.71%	35.71%
Deferred Tax Balance	-	-	-	791,631	2,773,055	4,436,653	5,807,055	6,905,370	7,752,709	8,367,249
Book Accumulated Depreciation Balance	-	-	-	3,941,037	10,246,697	16,552,357	22,858,016	29,163,676	35,469,336	41,774,995
Unrecovered Investment - Book	2,178,929	52,427,728	119,352,320	164,209,888	164,209,888	164,209,888	164,209,888	164,209,888	164,209,888	164,209,888
Book Depreciation	-	-	-	3,941,037	6,305,660	6,305,660	6,305,660	6,305,660	6,305,660	6,305,660
Unrecovered Investment - Tax total	2,178,929	52,427,728	119,352,320	164,209,888	164,209,888	164,209,888	164,209,888	164,209,888	164,209,888	164,209,888
Tax Depreciation	-	-	-	6,157,871	11,854,312	10,964,294	10,143,245	9,381,311	8,678,493	8,026,579
Allowed Rate of Return	11.04%	11.04%	11.04%	11.04%	11.04%	11.04%	11.04%	11.04%	11.04%	11.04%
Book Depreciation expense total	-	-	-	3,941,037	6,305,660	6,305,660	6,305,660	6,305,660	6,305,660	6,305,660
Tax Depreciation expense total	-	-	-	6,157,871	11,854,312	10,964,294	10,143,245	9,381,311	8,678,493	8,026,579
Annual Property Tax Rate	0.1500%	0.1500%	0.1500%	0.1500%	0.1500%	0.1500%	0.1500%	0.1500%	0.1500%	0.1500%
Deferred Tax Balance	-	-	-	791,631	1,981,424	1,663,588	1,370,402	1,098,315	847,339	614,540
Revenue Recovery on Capital Expenditure to date	2,178,929	52,427,728	119,352,320	164,209,888	164,209,888	164,209,888	164,209,888	164,209,888	164,209,888	164,209,888
Eligible Plant, cumulative capital expenditures	-	-	-	-	-	-	-	-	-	-
Less: Retired Plant	-	-	-	(3,941,037)	(10,246,697)	(16,552,357)	(22,858,016)	(29,163,676)	(35,469,336)	(41,774,995)
Plus: Accumulated Depreciation on Retired Plant	-	-	-	(791,631)	(2,773,055)	(4,436,653)	(5,807,055)	(6,905,370)	(7,752,709)	(8,367,249)
Less: Deferred Tax Balance	-	-	-	-	-	-	-	-	-	-
Plus: Deferred Tax Balance on Retired Plant	-	-	-	-	-	-	-	-	-	-
Environmental Compliance Rate Base	2,178,929	52,427,728	119,352,320	159,477,219	151,190,136	143,220,878	135,544,816	128,140,842	120,987,843	114,067,643
Rate of return	11.04%	11.04%	11.04%	11.04%	11.04%	11.04%	11.04%	11.04%	11.04%	11.04%
Return on Environmental Compliance Rate Base	\$ 240,466	\$ 5,785,899	\$ 13,171,665	\$ 17,599,830	\$ 16,685,271	\$ 15,605,788	\$ 14,958,661	\$ 14,141,562	\$ 13,352,161	\$ 12,588,451
Operating Expenses	-	-	2,730,914	12,899,784	17,179,567	17,523,158	17,873,621	18,231,093	18,595,715	18,967,630
Annual Depreciation expense	-	-	-	3,941,037	6,305,660	6,305,660	6,305,660	6,305,660	6,305,660	6,305,660
Less: Depreciation on retired plant	-	-	-	-	-	-	-	-	-	-
Annual Property Tax expense	-	-	-	-	-	-	-	-	-	-
Total OE	-	3,268	78,642	179,028	240,403	230,945	221,486	212,028	202,569	193,111
\$ -	\$ 3,268	\$ 2,809,555	\$ 17,019,860	\$ 23,725,630	\$ 24,059,762	\$ 24,400,767	\$ 24,748,781	\$ 25,103,944	\$ 25,466,400	\$ 25,829,511
Total E(m) - Project	240,466	5,789,167	15,981,220	34,819,690	40,410,901	39,665,550	39,359,428	38,890,343	38,456,105	38,054,851

**Revenue Requirements
Project 35 - KU**

In-Service Grant 2	November									
	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
				1	2	3	4	5	6	7
CapEx - GHZ PM Control Systems & SAM Mitigation	\$ 148,784	\$ 37,354,857	\$ 48,163,861	\$ 72,191,638	\$ 6,693,304	\$ -	\$ -	\$ -	\$ -	\$ -
Accumulated Expenditures	\$ 148,784	\$ 37,503,641	\$ 85,667,502	\$ 157,859,140	\$ 164,552,444	\$ 164,552,444	\$ 164,552,444	\$ 164,552,444	\$ 164,552,444	\$ 164,552,444
Book Depreciation rate, per year	0.000%	0.000%	0.000%	2.330%	2.330%	2.330%	2.330%	2.330%	2.330%	2.330%
Tax Depreciation rate, per year	0.000%	0.000%	0.000%	3.750%	7.219%	6.677%	6.177%	5.713%	5.285%	4.888%
Income tax rate	35.71%	35.71%	35.71%	35.71%	35.71%	35.71%	35.71%	35.71%	35.71%	35.71%
Deferred Tax Balance	-	-	-	1,949,749	4,822,608	7,376,978	9,637,540	11,625,447	13,361,855	14,864,978
Book Accumulated Depreciation Balance	-	-	-	459,765	4,293,837	8,127,909	11,961,981	15,796,053	19,630,124	23,464,196
Unrecovered Investment — Book	148,784	37,503,641	85,667,502	157,859,140	164,552,444	164,552,444	164,552,444	164,552,444	164,552,444	164,552,444
Book Depreciation	-	-	-	459,765	3,834,072	3,834,072	3,834,072	3,834,072	3,834,072	3,834,072
Unrecovered Investment — Tax total	148,784	37,503,641	85,667,502	157,859,140	164,552,444	164,552,444	164,552,444	164,552,444	164,552,444	164,552,444
Tax Depreciation	-	-	-	5,919,718	11,879,041	10,987,167	10,164,404	9,400,881	8,696,597	8,043,323
Allowed Rate of Return	11.04%	11.04%	11.04%	11.04%	11.04%	11.04%	11.04%	11.04%	11.04%	11.04%
Book Depreciation expense total	-	-	-	459,765	3,834,072	3,834,072	3,834,072	3,834,072	3,834,072	3,834,072
Tax Depreciation expense total	-	-	-	5,919,718	11,879,041	10,987,167	10,164,404	9,400,881	8,696,597	8,043,323
Annual Property Tax Rate	0.1500%	0.1500%	0.1500%	0.1500%	0.1500%	0.1500%	0.1500%	0.1500%	0.1500%	0.1500%
Deferred Tax Balance	-	-	-	1,949,749	2,872,858	2,554,370	2,260,562	1,987,908	1,736,408	1,503,124
Revenue Recovery on Capital Expenditure to date										
Eligible Plant, cumulative capital expenditures	148,784	37,503,641	85,667,502	157,859,140	164,552,444	164,552,444	164,552,444	164,552,444	164,552,444	164,552,444
Less: Retired Plant	-	-	-	-	-	-	-	-	-	-
Less: Accumulated Depreciation	-	-	-	(459,765)	(4,293,837)	(8,127,909)	(11,961,981)	(15,796,053)	(19,630,124)	(23,464,196)
Plus: Accumulated Depreciation on Retired Plant	-	-	-	-	-	-	-	-	-	-
Less: Deferred Tax Balance	-	-	-	(1,949,749)	(4,822,608)	(7,376,978)	(9,637,540)	(11,625,447)	(13,361,855)	(14,864,978)
Plus: Deferred Tax Balance on Retired Plant	-	-	-	-	-	-	-	-	-	-
Environmental Compliance Rate Base	148,784	37,503,641	85,667,502	155,449,626	155,436,000	149,047,558	142,952,924	137,130,944	131,560,465	126,223,269
Rate of return	11.04%	11.04%	11.04%	11.04%	11.04%	11.04%	11.04%	11.04%	11.04%	11.04%
Return on Environmental Compliance Rate Base	\$ 16,420	\$ 4,138,884	\$ 9,454,225	\$ 17,155,347	\$ 17,153,843	\$ 16,448,817	\$ 15,776,216	\$ 15,133,706	\$ 14,518,950	\$ 13,929,940
Operating Expenses										
Annual Depreciation expense	-	8,692	1,276,696	2,183,254	12,112,005	12,354,245	12,601,330	12,853,356	13,110,424	13,372,632
Less depreciation on retired plant	-	-	-	459,765	3,834,072	3,834,072	3,834,072	3,834,072	3,834,072	3,834,072
Annual Property Tax expense	-	223	56,255	128,501	236,099	240,388	234,637	228,886	223,135	217,383
Total OE	\$ -	\$ 8,915	\$ 1,332,951	\$ 2,771,520	\$ 16,182,176	\$ 16,428,705	\$ 16,670,039	\$ 16,916,314	\$ 17,167,630	\$ 17,424,087
Total E(m) - Project	16,420	4,147,799	10,787,176	19,926,866	33,336,019	32,877,522	32,446,255	32,050,020	31,686,560	31,354,027

**Revenue Requirements
Project 35 - KU**

In-Service Ghent 3	October									
	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
CapEx - GH3 PM Control Systems-SAM Mitigation-SCR Turn-down	\$ 1,307,716	\$ 4,809,001	\$ 47,890,171	\$ 56,057,325	\$ 84,049,087	\$ 3,898,032	\$ -	\$ -	\$ -	\$ -
Accumulated Expenditures	\$ 1,307,716	\$ 6,116,717	\$ 54,006,888	\$ 110,064,213	\$ 194,113,300	\$ 198,011,331	\$ 198,011,331	\$ 198,011,331	\$ 198,011,331	\$ 198,011,331
Book Depreciation rate, per year	0.000%	0.000%	0.000%	0.000%	2.630%	2.630%	2.630%	2.630%	2.630%	2.630%
Tax Depreciation rate, per year	0.000%	0.000%	0.000%	0.000%	3.750%	7.219%	6.877%	6.177%	5.713%	5.285%
Income tax rate	35.71%	35.71%	35.71%	35.71%	35.71%	35.71%	35.71%	35.71%	35.71%	35.71%
Deferred Tax Balance	-	-	-	-	2,219,616	5,464,490	8,326,118	10,834,196	13,014,181	14,891,527
Book Accumulated Depreciation Balance	-	-	-	-	1,063,579	6,271,277	11,478,975	16,686,673	21,894,371	27,102,069
Unrecovered Investment - Book	1,307,716	6,116,717	54,006,888	110,064,213	194,113,300	198,011,331	198,011,331	198,011,331	198,011,331	198,011,331
Book Depreciation	-	-	-	-	1,063,579	5,207,698	5,207,698	5,207,698	5,207,698	5,207,698
Unrecovered Investment - Tax total	1,307,716	6,116,717	54,006,888	110,064,213	194,113,300	198,011,331	198,011,331	198,011,331	198,011,331	198,011,331
Tax Depreciation	-	-	-	-	7,279,249	14,294,438	13,221,217	12,231,160	11,312,387	10,464,899
Allowed Rate of Return	11.04%	11.04%	11.04%	11.04%	11.04%	11.04%	11.04%	11.04%	11.04%	11.04%
Book Depreciation expense total	-	-	-	-	1,063,579	5,207,698	5,207,698	5,207,698	5,207,698	5,207,698
Tax Depreciation expense total	-	-	-	-	7,279,249	14,294,438	13,221,217	12,231,160	11,312,387	10,464,899
Annual Property Tax Rate	0.1500%	0.1500%	0.1500%	0.1500%	0.1500%	0.1500%	0.1500%	0.1500%	0.1500%	0.1500%
Deferred Tax Balance	-	-	-	-	2,219,616	3,244,875	2,961,627	2,508,078	2,179,985	1,877,346
Revenue Recovery on Capital Expenditure to date										
Eligible Plant, cumulative capital expenditures	1,307,716	6,116,717	54,006,888	110,064,213	194,113,300	198,011,331	198,011,331	198,011,331	198,011,331	198,011,331
Less: Retired Plant	-	-	-	-	-	-	-	-	-	-
Less: Accumulated Depreciation	-	-	-	-	(1,063,579)	(6,271,277)	(11,478,975)	(16,686,673)	(21,894,371)	(27,102,069)
Plus: Accumulated Depreciation on Retired Plant	-	-	-	-	-	-	-	-	-	-
Less: Deferred Tax Balance	-	-	-	-	(2,219,616)	(5,464,490)	(8,326,118)	(10,834,196)	(13,014,181)	(14,891,527)
Plus: Deferred Tax Balance on Retired Plant	-	-	-	-	-	-	-	-	-	-
Environmental Compliance Rate Base	1,307,716	6,116,717	54,006,888	110,064,213	190,830,105	186,275,564	178,206,238	170,490,462	163,102,779	156,017,735
Rate of return	11.04%	11.04%	11.04%	11.04%	11.04%	11.04%	11.04%	11.04%	11.04%	11.04%
Return on Environmental Compliance Rate Base	\$ 144,319	\$ 675,038	\$ 5,960,174	\$ 12,146,634	\$ 21,059,919	\$ 20,557,282	\$ 19,666,755	\$ 18,815,246	\$ 17,999,945	\$ 17,218,043
Operating Expenses										
Annual Depreciation expense	-	-	642,953	4,721,847	6,363,418	17,537,222	17,887,966	18,245,725	18,610,640	18,982,853
Less: depreciation on retired plant	-	-	-	-	1,063,579	5,207,698	5,207,698	5,207,698	5,207,698	5,207,698
Annual Property Tax expense	-	-	-	-	-	-	-	-	-	-
Total OE	-	\$ 1,962	\$ 652,128	\$ 4,802,857	\$ 7,592,093	\$ 23,034,494	\$ 23,983,274	\$ 23,733,222	\$ 24,090,325	\$ 24,454,726
Total E(m) - Project	144,319	677,000	6,612,303	16,949,491	28,652,013	43,591,777	43,050,030	42,548,468	42,090,270	41,672,769

**Revenue Requirements
Project 35 - KU**

	December									
	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
In-Service Client 4					1	2	3	4	5	6
CapEx - GH4 PM Control Systems-SAM Mitigation-SCR Turn-down	\$ 1,458,737	\$ 4,321,807	\$ 35,116,729	\$ 57,307,535	\$ 77,571,909	\$ 8,984,440	\$ -	\$ -	\$ -	\$ -
Accumulated Expenditures	\$ 1,458,737	\$ 5,780,544	\$ 40,897,273	\$ 98,204,808	\$ 175,776,717	\$ 184,761,157	\$ 184,761,157	\$ 184,761,157	\$ 184,761,157	\$ 184,761,157
Book Depreciation rate, per year	0.000%	0.000%	0.000%	0.000%	2.790%	2.790%	2.790%	2.790%	2.790%	2.790%
Tax Depreciation rate, per year	0.000%	0.000%	0.000%	0.000%	3.750%	6.677%	6.677%	6.177%	5.713%	5.285%
Income tax rate	35.71%	35.71%	35.71%	35.71%	35.71%	35.71%	35.71%	35.71%	35.71%	35.71%
Deferred Tax Balance	-	-	-	-	2,280,900	5,203,075	7,767,648	10,002,330	11,930,873	13,577,029
Book Accumulated Depreciation Balance	-	-	-	-	204,340	5,359,177	10,514,013	15,668,849	20,823,686	25,978,522
Unrecovered Investment - Book	1,458,737	5,780,544	40,897,273	98,204,808	175,776,717	184,761,157	184,761,157	184,761,157	184,761,157	184,761,157
Book Depreciation	-	-	-	-	204,340	5,154,836	5,154,836	5,154,836	5,154,836	5,154,836
Unrecovered Investment - Tax total	1,458,737	5,780,544	40,897,273	98,204,808	175,776,717	184,761,157	184,761,157	184,761,157	184,761,157	184,761,157
Tax Depreciation	-	-	-	-	6,591,627	13,337,908	12,336,502	11,412,697	10,555,405	9,764,627
Allowed Rate of Return	11.04%	11.04%	11.04%	11.04%	11.04%	11.04%	11.04%	11.04%	11.04%	11.04%
Book Depreciation expense total	-	-	-	-	204,340	5,154,836	5,154,836	5,154,836	5,154,836	5,154,836
Tax Depreciation expense total	-	-	-	-	6,591,627	13,337,908	12,336,502	11,412,697	10,555,405	9,764,627
Annual Property Tax Rate	0.1500%	0.1500%	0.1500%	0.1500%	0.1500%	0.1500%	0.1500%	0.1500%	0.1500%	0.1500%
Deferred Tax Balance	-	-	-	-	2,280,900	2,922,175	2,564,573	2,234,682	1,928,543	1,646,156
Revenue Recovery on Capital Expenditure to date	1,458,737	5,780,544	40,897,273	98,204,808	175,776,717	184,761,157	184,761,157	184,761,157	184,761,157	184,761,157
Eligible Plant, cumulative capital expenditures	-	-	-	-	(204,340)	(5,359,177)	(10,514,013)	(15,668,849)	(20,823,686)	(25,978,522)
Less: Retired Plant	-	-	-	-	-	-	-	-	-	-
Less: Accumulated Depreciation	-	-	-	-	-	-	-	-	-	-
Plus: Accumulated Depreciation on Retired Plant	-	-	-	-	(2,280,900)	(5,203,075)	(7,767,648)	(10,002,330)	(11,930,873)	(13,577,029)
Less: Deferred Tax Balance	-	-	-	-	-	-	-	-	-	-
Plus: Deferred Tax Balance on Retired Plant	-	-	-	-	-	-	-	-	-	-
Environmental Compliance Rate Base	1,458,737	5,780,544	40,897,273	98,204,808	173,291,476	174,198,905	166,479,496	159,099,978	152,006,599	145,205,606
Rate of return	11.04%	11.04%	11.04%	11.04%	11.04%	11.04%	11.04%	11.04%	11.04%	11.04%
Return on Environmental Compliance Rate Base	\$ 160,866	\$ 637,938	\$ 4,513,404	\$ 10,837,836	\$ 19,124,365	\$ 19,224,508	\$ 18,372,598	\$ 17,557,094	\$ 16,775,376	\$ 16,024,821
Operating Expenses	-	-	3,576,918	5,256,715	5,848,876	17,391,503	17,739,333	18,094,120	18,456,002	18,825,122
Annual Depreciation expense	-	-	-	-	204,340	5,154,836	5,154,836	5,154,836	5,154,836	5,154,836
Less Depreciation on retired plant	-	-	-	-	-	-	-	-	-	-
Annual Property Tax expense	-	2,188	8,671	61,346	147,307	269,359	269,103	261,371	253,638	245,906
Total OE	\$ -	\$ 2,188	\$ 3,587,589	\$ 5,318,061	\$ 6,200,524	\$ 22,809,698	\$ 23,163,272	\$ 23,510,327	\$ 23,864,477	\$ 24,225,865
Total E(m) - Project	160,866	640,126	8,100,993	16,155,897	25,324,888	42,034,206	41,535,870	41,067,421	40,639,852	40,250,686

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Year in Service	Tax Depreciation, 20		Book Depreciation	
	yr HL.			
1	3.75%	Ghent 1PC	3.87%	Assumes all investments to plant account 312 Updated using Depreciation Rates in effect as of 2/6/09 Source: KU and LG&E ECR Databases
2	7.22%	Ghent 1	3.84%	
3	6.68%	Ghent 2	2.33%	
4	6.18%	Ghent 3	2.63%	
5	5.71%	Ghent 4	2.79%	
6	5.29%	Brown 1	2.98%	
7	4.89%	Brown 2	3.01%	
8	4.52%	Brown 3	2.80%	
9	4.46%	Ghent 1,3,&4	3.09%	
10	4.46%	Mill Creek 1PC	4.50%	
11	4.46%	Mill Creek 1NPC	4.24%	
12	4.46%	Mill Creek 2PC	4.28%	
13	4.46%	Mill Creek 2NPC	4.70%	
14	4.46%	Mill Creek 3PC	3.85%	
15	4.46%	Mill Creek 3NPC	3.87%	
16	4.46%	Mill Creek 4NPC	3.85%	
17	4.46%	Mill Creek 4PC	3.71%	
18	4.46%	TrimblePC	3.62%	
19	4.46%	TrimbleNPC	3.62%	
20	4.46%	All Plants-LGE	4.59%	
21	2.23%	All Plants-KU	3.07%	
22	0.00%			
23	0.00%			
24	0.00%			
25	0.00%			
26	0.00%	Cane Run 4	5.88%	
27	0.00%	Cane Run 5	6.11%	
28	0.00%	Cane Run 6	4.46%	
29	0.00%	Green River 3	3.08%	
30	0.00%	Green River 4	4.20%	
31	0.00%			
32	0.00%			
33	0.00%			
34	0.00%			
35	0.00%			
36	0.00%			
37	0.00%			
38	0.00%			
39	0.00%			
40	0.00%			
41	0.00%			
42	0.00%			
43	0.00%			
44	0.00%			
45	0.00%			
46	0.00%			
47	0.00%			
48	0.00%			
49	0.00%			
50	0.00%			
51	0.00%			
52	0.00%			
53	0.00%			
54	0.00%			
55	0.00%			
56	0.00%			
57	0.00%			

PC = Scrubber/FGD
NPC = All other Pollution Control

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Unit	12/31/1995 Rate	1/1/2005 Rate	2/6/2009
BR1N.1311	2.90%	2.90%	0.60%
BR1N.1312	2.88%	2.88%	2.98%
BR1N.1314	2.88%	2.88%	1.12%
BR1N.1315	2.88%	2.88%	2.10%
BR1N.1316	2.88%	2.88%	2.26%
BR2N.1311	2.88%	2.88%	0.08%
BR2N.1312	2.88%	2.88%	3.01%
BR2N.1314	2.88%	2.88%	2.91%
BR2N.1315	2.88%	2.88%	0.48%
BR2N.1316	2.88%	2.88%	0.71%
BR3N.1311	3.91%	3.91%	0.54%
BR3N.1312	3.91%	3.91%	2.80%
BR3N.1314	3.91%	3.91%	3.17%
BR3N.1315	3.91%	3.91%	0.54%
BR3N.1316	3.91%	3.91%	2.33%
BR3S.1311	3.91%	3.91%	2.65%
BR3S.1312	3.91%	3.91%	3.87%
BR3S.1314	3.91%	3.91%	0.00%
BR3S.1315	3.91%	3.91%	2.70%
GH1N.1311	3.12%	3.12%	0.39%
GH1N.1312	3.12%	3.12%	3.84%
GH1N.1314	3.12%	3.12%	2.23%
GH1N.1315	3.12%	3.12%	0.55%
GH1N.1316	3.12%	3.12%	1.38%
GH1S.1311	3.12%	3.12%	2.65%
GH1S.1312	3.12%	3.12%	3.87%
GH1S.1314	3.12%	3.12%	0.00%
GH1S.1315	3.12%	3.12%	2.70%
GH1S.1316	3.12%	3.12%	2.87%
GH2N.1311	1.84%	1.84%	0.50%
GH2N.1312	1.84%	1.84%	2.33%
GH2N.1314	1.84%	1.84%	2.08%
GH2N.1315	1.84%	1.84%	0.60%
GH2N.1316	1.84%	1.84%	1.07%
GH2S.1311	1.84%	1.84%	2.65%
GH2S.1312	1.84%	1.84%	3.87%
GH2S.1314	1.84%	1.84%	0.00%
GH2S.1315	1.84%	1.84%	2.70%
GH2S.1316	1.84%	1.84%	2.87%
GH3N.1311	2.22%	2.22%	1.19%
GH3N.1312	2.22%	2.22%	2.63%
GH3N.1314	2.22%	2.22%	2.03%
GH3N.1315	2.22%	2.22%	1.03%
GH3N.1316	2.22%	2.22%	1.40%
GH3N.1392	2.22%	2.22%	0.00%
GH3S.1311	5.67%	5.67%	2.65%
GH3S.1312	5.67%	5.67%	3.87%
GH3S.1314	5.67%	5.67%	0.00%
GH3S.1315	5.67%	5.67%	2.70%
GH3S.1316	5.67%	5.67%	0.00%
GH4N.1311	2.16%	2.16%	1.41%
GH4N.1312	2.16%	2.16%	2.79%
GH4N.1314	2.16%	2.16%	2.20%
GH4N.1315	2.16%	2.16%	1.22%
GH4N.1316	2.16%	2.16%	2.03%
GH4S.1311	2.16%	5.67%	2.65%

KU Depreciation Rate

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GH4S.1312	2.16%	5.67%	3.87%
GH4S.1314	2.16%	5.67%	0.00%
GH4S.1315	2.16%	5.67%	2.70%
GH4S.1316	2.16%	5.67%	0.00%
GR2N.1311	0.00%	1.94%	0.00%
GR2N.1312	0.00%	1.94%	2.18%
GR2N.1314	0.00%	1.94%	0.00%
GR2N.1315	0.00%	1.94%	0.00%
GR2N.1316	0.00%	1.94%	0.00%
GR3N.1311	0.00%	1.94%	0.00%
GR3N.1312	0.00%	1.94%	3.08%
GR3N.1314	0.00%	1.94%	2.90%
GR3N.1315	0.00%	1.94%	0.00%
GR3N.1316	0.00%	1.94%	3.97%
GR4N.1311	3.10%	3.10%	0.00%
GR4N.1312	3.10%	3.10%	4.20%
GR4N.1314	3.10%	3.10%	3.79%
GR4N.1315	3.10%	3.10%	1.46%
GR4N.1316	3.10%	3.10%	2.71%
KUTR.1392	2.22%	5.67%	20.00%
SW00.1391	20%	20%	10.14%
TY3N.1311	2.13%	2.13%	0.00%
TY3N.1312	2.13%	2.13%	3.99%
TY3N.1314	2.13%	2.13%	3.44%
TY3N.1315	2.13%	2.13%	0.00%
TY3N.1316	2.13%	2.13%	3.12%

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Unit	12/31/1995 Rate	1/1/2005 Rate	2/6/2009
CR4N.131100	2.94%	2.94%	1.14%
CR4N.131200	2.94%	2.94%	5.88%
CR4N.131500	2.94%	2.94%	3.18%
CR4S.131100	3.47%	3.47%	0.95%
CR4S.131200	3.47%	3.47%	4.93%
CR4S.131500	3.47%	3.47%	0.82%
CR5N.131100	2.87%	2.87%	1.92%
CR5N.131200	2.87%	2.87%	6.11%
CR5N.131500	2.87%	2.87%	2.97%
CR5S.131100	3.47%	3.47%	1.56%
CR5S.131200	3.47%	3.47%	4.07%
CR5S.131500	3.47%	3.47%	1.49%
CR6N.131100	3.06%	3.06%	2.13%
CR6N.131200	3.06%	3.06%	5.19%
CR6N.131500	3.06%	3.06%	2.80%
CR6S.131100	2.18%	2.18%	2.04%
CR6S.131200	2.18%	2.18%	4.46%
CR6S.131500	2.18%	2.18%	1.44%
CRLF.131200	2.82%	2.82%	2.13%
MC1N.131100	2.39%	2.39%	1.64%
MC1N.131200	2.39%	2.39%	4.24%
MC1N.131500	2.39%	2.39%	2.75%
MC1S.131100	3.90%	3.90%	1.65%
MC1S.131200	3.90%	3.90%	4.50%
MC1S.131500	3.90%	3.90%	1.67%
MC2N.131100	2.29%	2.29%	1.42%
MC2N.131200	2.29%	2.29%	4.70%
MC2N.131500	2.29%	2.29%	2.03%
MC2S.131100	3.99%	3.99%	1.81%
MC2S.131200	3.99%	3.99%	4.28%
MC2S.131500	3.99%	3.99%	1.69%
MC3N.131100	3.03%	3.03%	1.51%
MC3N.131200	3.03%	3.03%	3.87%
MC3N.131500	2.29%	2.29%	1.58%
MC3S.131100	4.54%	4.54%	1.47%
MC3S.131200	4.54%	4.54%	3.85%
MC3S.131500	3.99%	3.99%	1.56%
MC4N.131020	2.82%	2.82%	0.00%
MC4N.131100	2.82%	2.82%	1.85%
MC4N.131200	2.82%	2.82%	3.85%
MC4N.131500	2.29%	2.29%	1.75%
MC4S.131100	5.38%	5.38%	1.76%
MC4S.131200	5.38%	5.38%	3.71%
MC4S.131500	3.99%	3.99%	1.71%
MSUB.135310	2.10%	2.10%	1.32%
SW00.339130	20.00%	20.00%	21.96%
TC1N.131100	2.41%	2.41%	2.08%
TC1N.131200	2.41%	2.41%	3.62%
TC1N.131500	2.41%	2.41%	2.13%
TC1S.131100	3.47%	3.47%	2.28%
TC1S.131200	3.47%	3.47%	3.62%
TC1S.131500	3.47%	3.47%	2.12%
TC2N.131100	2.41%	2.41%	2.10%
TC2N.131200	2.41%	2.41%	4.28%
TC2N.131500	2.41%	2.41%	2.49%
TC2S.131100	3.47%	3.47%	2.10%
TC2S.131200	3.47%	3.47%	4.28%
TC2S.131500	3.47%	3.47%	2.49%

LGE Depreciation Rate

LOUISVILLE GAS AND ELECTRIC COMPANY

Response to Commission Staff's First Information Request Dated July 12, 2011

Case No. 2011-00162

Question No. 50

Witness: Charles R. Schram / Gary H. Revlett

- Q-50. How do the changes between the proposed rule and the final Cross-State Air Pollution rule impact the assumptions and results in your modeling and thus your recommendations in this case?
- A-50. In finalizing CATR, now called the Cross-State Air Pollution Rule ("CSAPR"), the EPA modified SO₂ and NO_x allowance allocations. The allowance allocation update, which primarily impacts the timing of allowances in the 2012-2014 period, does not affect the Companies' recommendations in the 2011 Compliance Plan filing.

The Companies jointly dispatch their generating fleets and optimize dispatch to meet emissions regulations in a least cost manner. The Companies have reviewed CSAPR and concluded that all of the projects in the 2011 Compliance plan are still required. The modifications to various systems at the Ghent and Mill Creek stations to expand the operating range at which the SCRs can function to reduce NO_x are still needed. These proposed modifications will provide additional margin against the NO_x tonnage caps. The FGD project at Mill Creek is required to meet NAAQS regulations and also supports compliance with CSAPR.

The table below compares allowance allocation assumed in the filing with the final rule.

Allowance Allocations Under the Proposed and Final CATR/CSAPR Rule			
	Proposed Rule	Final Rule	Change
Louisville Gas and Electric Company			
SO2 2012-2013	35,277	37,306	6%
SO2 2014+	21,999	17,170	-22%
Annual NOx 2012-2013	13,540	13,871	2%
Annual NOx 2014+	13,540	12,620	-7%
Kentucky Utilities Company			
SO2 2012-2013	32,632	41,847	28%
SO2 2014+	22,449	19,887	-11%
Annual NOx 2012-2013	10,673	15,555	46%
Annual NOx 2014+	10,673	14,247	33%
Combined LG&E/KU System			
SO2 2012-2013	67,909	79,153	17%
SO2 2014+	44,448	37,057	-17%
Annual NOx 2012-2013	24,213	29,426	22%
Annual NOx 2014+	24,213	26,867	11%

LOUISVILLE GAS AND ELECTRIC COMPANY

Response to Commission Staff's First Information Request Dated July 12, 2011

Case No. 2011-00162

Question No. 51

Witness: Charles R. Schram

- Q-51. Do you anticipate that the cap and trade provision will provide any lower cost alternatives to either LG&E? Will it provide any economic opportunities to allow LG&E to create any new revenue streams?
- A-51. No. LG&E assumes the question refers to the cap and trade provisions under CATR (the EPA now calls the rule Cross-State Air Pollution Rule, or CSAPR). The cap and trade provisions under CSAPR depend on intra-state allowance trading rather than the unrestricted inter-state allowance trading characteristic of the acid rain program. CSAPR appears to discourage trading as a method of compliance. It is unlikely that these limited trade provisions will result in a robust allowance market or provide any lower cost alternatives to LG&E.

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Case No. 2011-00162

Question No. 52

Witness: John N. Voyles, Jr.

- Q-52. Refer to LG&E Application at page 5. LG&E proposes to build a Particulate Matter Control System for each of the four Generating units at Mill Creek and for TC1. Each Particulate Matter Control System comprises a pulse-jet fabric filter ("baghouse") to capture particulate matter, a Powdered Activated Carbon ("PAC") injection system to capture mercury, and a lime injection system to protect the baghouse from the corrosive effects of sulfuric acid mist ("SAM"). These Particulate Matter Control Systems will be similar to the baghouse (including the SAM mitigation and PAC injection systems) installed at Trimble County Unit 2 ("TC2") as part of its overall air quality control system (which the Commission approved as part of LG&E's 2006 Plan).
- a. Explain the make and model and the technology of all pulse-jet fabric filter ("baghouses") to capture particulate matter.
 - b. Explain the make and model and the technology of all Powdered Activated Carbon ("PAC") injection system to capture mercury.
 - c. Is the technology of the Selective Catalytic Reduction ("SCR") proposed to be installed in Mill Creek and TC1 units the most cost effective and the most efficient available in power generation industry? If there are other technologies available in the market, explain why they were not selected.
 - d. Explain if the above Particulate Matter Control Systems technologies are flexible, so it can provide reduction of inhalable particulate required by future regulations.
- A-52.
- a. LG&E has not yet conducted a bid process to choose the final technology vendor for pulse-jet fabric filters for any of the units in our fleet. The selection of the specific vendor does not impact the compliance plan.
 - b. LG&E has not yet conducted a bid process to choose the final technology vendor for PSC injection systems for any of the units in our fleet. The selection of the specific vendor does not impact the compliance plan.
 - c. LG&E is not requesting approval to install new SCR's in this plan. The projects proposed in this compliance plan include modifications to the boiler circuits that will

enhance the operation of those same SCR installations to improve their operating ranges.

- d. There is no information provided by the EPA on the future standards for inhalable particulate matter. It is not possible to assess the future performance of the proposed equipment based on unknown standards.

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Question No. 53

Witness: John N. Voyles, Jr.

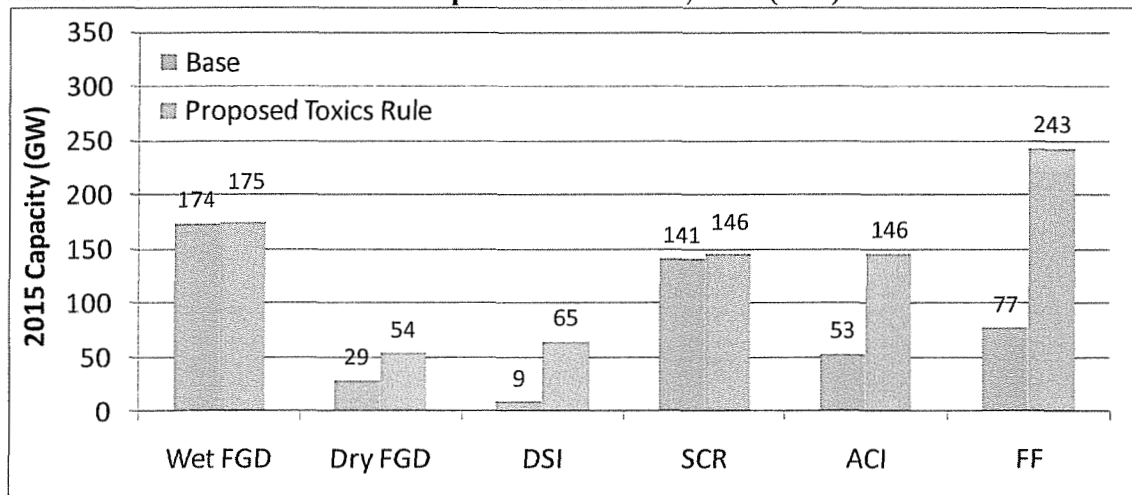
- Q-53. Refer to LG&E Application, paragraph 13. A statement is made that "Building these Particulate Matter Control Systems is the most cost-effective means of complying with the HAPs Rule." Is this an industry-wide position or specific to the LG&E fleet?
- a. If this is an industry position, provide the study/work papers which support this statement.
 - b. If LG&E specific, provide a summary of the support for this position.
- A-53. The Companies' position is both an LG&E/KU position and an industry position. As discussed in Exhibit JNV-2, Pulse Jet Fabric Filters (PJFF) in combination with Powdered Activated Carbon (PAC) Injection systems are an effective way to meet particulate control regulations but also allows for compliance with the pending HAPs rule based on the coal specifications that the LG&E boilers are designed to utilize. To determine how cost-effective a particular compliance strategy will be first requires determining the appropriate technologies and then to assessing the constructability issues along with any balance-of-plant impacts associated with implementing those technologies. As Black and Veatch have engineering expertise in the suite of available technologies and familiarity with our unit design, they were selected to conduct studies throughout our fleet. Their recommendations to the Companies were based on which technologies would comply with EPA regulations and would be most cost effective based on their industry experiences as well as the results of their assessment of our fleet. Please reference the Black and Veatch reports for additional information.

The EPA's analyses on the Utility MACT regulation's impact on coal-fired generation states an expected 166 GW of coal fired units throughout the U.S. will be retrofitted with fabric filter technology. Please see the attached excerpt from the EPA's report titled "Regulatory Impact Analysis of the Proposed Toxics Rule" dated March 2011 that includes projection materials regarding the installation of PJFF technology throughout the industry. The full report is included on the CD in the folder titled Question 53.

Table 8-6. Capital, FOM, and VOM Costs by Control Technology for the Proposed Toxics Rule (millions of 2007\$)

	Dry FGD + FF	DSI	FF	ACI	FGD Upgrade	Waste Coal FGD	Total
Capital	1,421	428	1,092	1,498	669	94	5,201
FOM	252	71	41	48	0	20	431
VOM	377	1,241	105	627	0	66	2,416
2015 Annual Capital+FOM+VOM	2,050	1,740	1,238	2,173	669	179	8,048

Source: Integrated Planning Model run by EPA, 2011.

Figure 8-6. Retrofit Pollution Control Installations on Coal-fired Capacity (by Technology) with the Base Case and with the Proposed Toxics Rule, 2015 (GW)

Note: The difference between controlled capacity in the base case and under the proposed Toxics Rule may not necessarily equal new retrofit construction, since controlled capacity above reflects incremental operation of dispatchable controls in 2015. For this reason, and due to rounding, numbers in the text above may not reflect the increments displayed in this figure. See IPM Documentation for more information on dispatchable controls.

Source: Integrated Planning Model run by EPA, 2011.

8.5 Projected Generation Mix

Table 8-7 and Figure 8-7 show the generation mix in the base case and in the proposed Toxics Rule policy case. In 2015, coal-fired generation is projected to decline slightly and natural-gas-fired generation is projected to increase slightly relative to the base case. Coal-fired generation is projected to increase above 2009 actual levels. The vast majority (over 95%) of base case coal capacity is projected to remain in service under the proposed Toxics Rule. In

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Question No. 54

Witness: John N. Voyles, Jr.

- Q-54. Refer to LG&E Application, paragraph 21. Project 19, approved by the commission, approved Sulfuric acid mist ("SAM") mitigation systems for Mill Creek 3 and 4 which have not been built. This application asks for Particulate Matter Control Systems ("PMCS") to serve all the generating units at Mill Creek and Trimble County Generating Station Unit 1 ("TC1").
- a. Has SAM technology changed from the Project 19 approval to the currently proposed Project 26? Explain in detail.
 - b. Is a SAM mitigation system a component of a PMCS?
- A-54. a. No. SAM mitigation equipment originally planned to comply with BART for Mill Creek units 3 and 4 is still in LG&E's compliance plans to be installed. However, due to the delay in BART regulations, the installation of this technology has been deferred.
- b. The SAM mitigation equipment as part of Project 19 is separate from the SAM mitigation in the PMCS equipment as part of Project 26. The PMSC included in LG&E's plan to comply with the Utility MACT regulation also has SAM reduction benefits; however, the lime injection prior to the fabric filter is primarily to protect the fabric filter internals from sulfuric acid corrosion. Both SAM mitigation equipment and PMSC technology will be installed on Mill Creek units 3 and 4.

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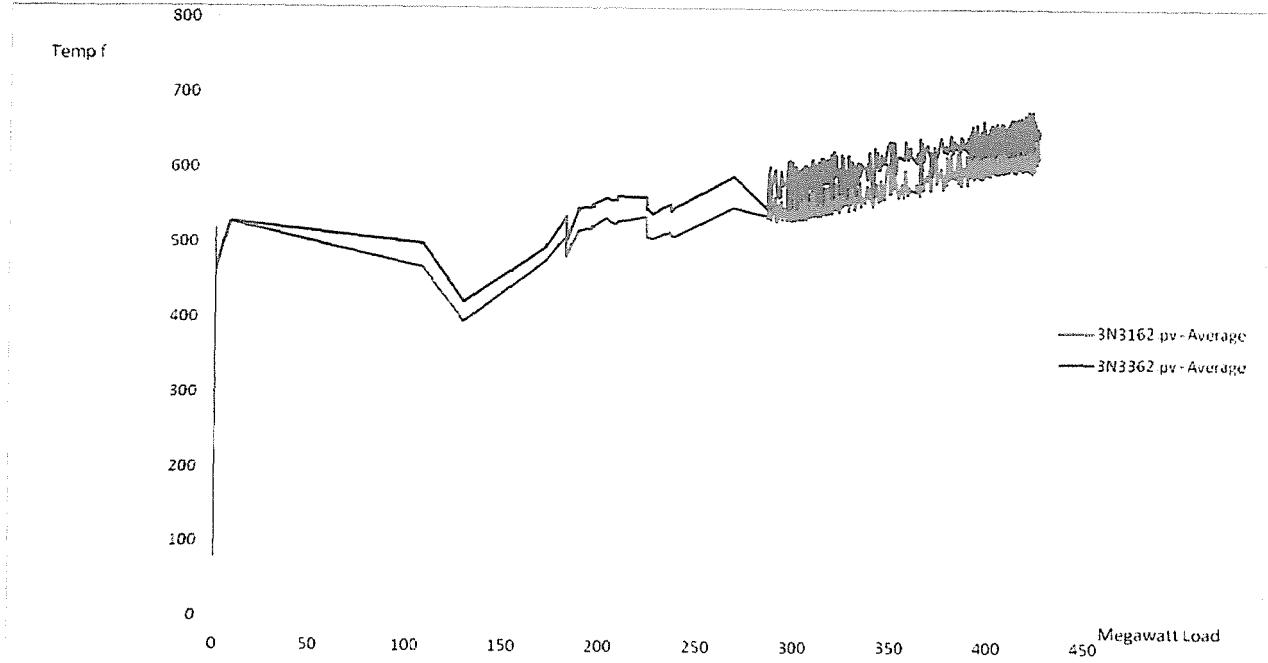
Question No. 55

Witness: John N. Voyles, Jr.

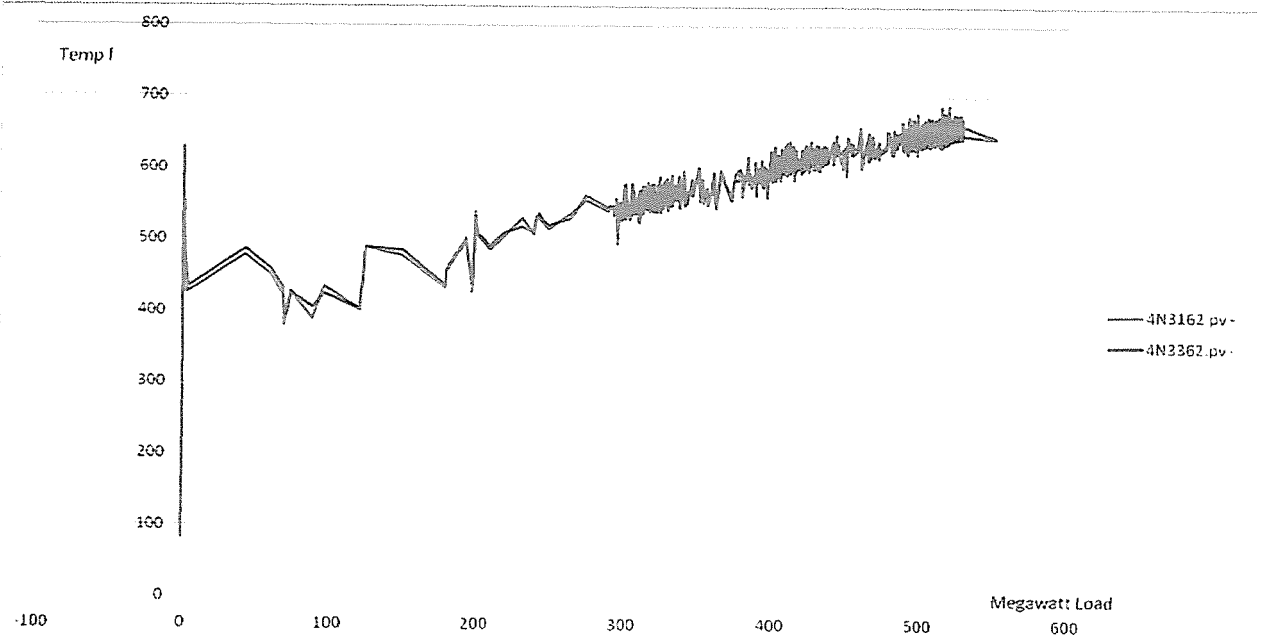
- Q-55. Refer to Voyles Testimony at page 7. The testimony supports modifications to various systems at Mill Creek Units 3 and 4 to expand the operating range of the units at which their existing SCR equipment can function to reduce NOx emissions. Currently, the SCRs can operate only when the Mill Creek units are operating at relatively high generating load levels due to the SCR requiring flue gas temperatures above approximately 630 degrees Fahrenheit. Provide the engineering support for temperature/load versus performance of the catalytic function.
- a. Explain the relationship between the proximity to the burners and the effectiveness of the SCR?
 - b. In combining flues for operation, does this affect the performance of the SCRs? Explain in summary fashion.
 - c. Provide any available efficiency curves.
- A-55. a. The proximity of the burners to the SCR is not a primary factor in operating temperatures. Every boiler system has different exit temperatures over its load range due to variables such as fuel selection, effectiveness of fuel grind, burner technology, boiler design, economizer design and air heater design. Given the temperature profile versus generating load of each unit differs, some units have higher temperatures at low loads than others. Most SCRs installed in coal-fired applications have catalyst with required minimum operating temperatures approximately of 630 – 640 degrees Fahrenheit or more. Catalyst vendor and SCR technology provider information can be supplied to support the minimum operating temperature requirement if desired.
- b. Mill Creek 3 and 4 do not have combined flue streams.
 - c. The attachment contains the Mill Creek Units 3 and 4 gas outlet temperature versus load curves.

Mill Creek Load vs. Temperature Curve

Unit 3 Gas Outlet Temp vs. Load



Unit 4 Gas Outlet Temp vs Load



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Question No. 56

Witness: John N. Voyles, Jr.

- Q-56. Refer to Voyles Testimony at page 13. The testimony indicates that the addition of a higher efficiency FGD in combination with the installation of Particulate Matter Control Systems will require the installation of larger induced draft fans and/or the installation of booster fans to account for the increased pressure drop through the flue gas train. These larger or additional fans will likely require auxiliary power upgrades.
- a. Are those likely costs included in the Black & Veatch financial estimates?
 - b. Do these fans affect the thermal properties of the flue gas?
 - c. Will they affect the power output of the generators?
- A-56. a. Black and Veatch identified auxiliary power impacts and included costs in their estimates for the auxiliary power system upgrades. These estimates are based on conceptual engineering and are considered estimates. Final design of duct runs and the selection of the fabric filter and FGD vendors will enable final calculations of increased auxiliary power requirements.
- b. There will be insignificant impacts to the temperature of the flue gas associated with selection of replacement fans and new ductwork configurations.
 - c. The increased horsepower for the new fans will add to the parasitic load required by the plant, thus reducing the net power generated from the units. This loss is normal for any retrofit of technology of this scale and is not expected to be significant. This auxiliary load has been accounted for in the economic analysis of the projects under consideration in the proposed Compliance Plan.

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Response to Commission Staff's First Information Request Dated July 12, 2011

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Question No. 57

Witness: Robert M. Conroy

Q-57. Refer to Voyles Testimony at page 8. Mr. Voyles discusses LG&E's preference for recovering costs associated with particulate sorbents. With respect to sorbent cost recovery, is there any difference in the recovery of costs, or any factors related thereto, for the proposed project 26, 27 and the previously approve project 19?

A-57. There is no difference in the amount of costs recovered related to sorbent for the proposed Project 26, 27 and the previously approved Project 19. As stated in testimony, from an operational perspective, it is very difficult to track separately SAM sorbent being used by multiple environmental facilities related to different ECR projects at the same generating unit with any reasonable certainty. Also, LG&E records all of a unit's SAM sorbent costs in the same subaccount, regardless of which system on the unit consumes the sorbent. It is important to note that multiple environmental facilities related to different ECR projects at the same generating unit will consume the same sorbent. It is not practical for the plants to maintain separate inventories of the same sorbent that has multiple uses.

In the alternative, LG&E would have to use an allocation to assign the sorbent costs to the appropriate approved project.

The purpose of LG&E's proposed method for sorbent cost recovery is for practical necessity and to provide the clearer reporting to the Commission.

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Response to Commission Staff's First Information Request Dated July 12, 2011

Case No. 2011-00162

Question No. 58

Witness: John N. Voyles, Jr.

Q-58. Refer to Voyles Testimony. Provide a brief discussion of the maturity and upgrade potential of:

- a. Baghouse technology;
- b. Powder Activated Carbon Injection;
- c. Lime injection for SAM Systems;
- d. FGDs (dry and wet); and
- e. SCRs.

A-58. Please see Exhibit JNV-2 Appendix A. A brief discussion is below.

- a. Baghouse technology has been in operation around the world for decades and thus is considered mature technology. However, most high sulfur coal units have utilized dry electrostatic precipitators throughout the world. The utilization of baghouses on coal fired units burning regional high sulfur coal is relatively new to the U.S. Regarding potential for upgrades, baghouse performance upgrades may be possible in the future as improved capabilities to model the flue gas flow through the baghouses evolves. It is also possible that improvements will be realized in the materials of construction of the bags and cages.
- b. PAC injection for the utility application is a relatively new application; however, the technology is rather simple in that PAC is injected in the flue gas prior to the baghouse. Upgrades in the future will likely include improvements in injection lances and material handling components.
- c. Lime injection is not a mature technology for coal fired utilities. Both the physical systems to transport the lime to the ductwork and the injection methodologies are new to the industry over the last 3-5 years. In addition to the physical components, the modeling of injection locations and specific methods is considered to be a new technology, especially when considering the industry's inexperience in understanding

the exact impacts on sulfur trioxide formation and reduction variables in the flue gas as it exits the boiler and progresses through the flue gas path to the stack.

- d. Both wet and dry FGD technologies is considered a mature technology. As with baghouses, upgrade potentials are likely in the future in specific components such as reactant nozzle design, pump component design, mist eliminator design and materials of construction.
- e. SCRs are considered mature technology with improvements in the primarily expected to be in catalyst formulation improvements.

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Response to Commission Staff's First Information Request Dated July 12, 2011

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Question No. 59

Witness: Shannon L. Charnas

Q-59. Refer to Charnas Testimony at page 7. The testimony states that in LG&E's 2006 Plan Case No. 2006-00208, the Commission approved separate SAM mitigation systems for Mill Creek Units 3 and 4 as part of Project 19; however, as Mr. Voyles explains in his testimony, LG&E has not yet built those systems, and there is no O&M associated with those systems in base rates or being recovered through the environmental surcharge mechanism.

- a. Is the same true for Capital Costs?
- b. Are any SAM mitigation system costs associated with Units 3 and 4 which are being recovered currently?

A-59. a. Yes, the same is true for capital costs. LG&E has not yet built the SAM mitigation systems for Mill Creek; therefore, no capital costs are included in base rates or being recovered through the environmental surcharge mechanism.

- b. No, there are no SAM mitigation costs associated with Units 3 and 4 currently being recovered.

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Response to Commission Staff's First Information Request Dated July 12, 2011

Case No. 2011-00162

Question No. 60

Witness: John N. Voyles, Jr.

- Q-60. Refer to Schram Testimony at page 4. In performing the analysis for the 2011 Environmental plan, Mr. Schram states that the analyses performed by the Companies' Project Engineering department and Black and Veatch produced the most cost-effective suite of environmental controls to meet the applicable environmental requirements.
- a. Are the initial air quality attainment equipment assumptions, e.g. the equipment used to meet the current air quality limits, thoroughly vetted and explored prior to model runs? Explain the decision making process.
 - b. What element did LG&E contribute versus Black and Veatch?
 - c. Does Black and Veatch represent other electric generation utilities in environmental issues?
 - d. If so, do they come to similar recommendations for air quality attainment?
- A-60. a. LG&E is in compliance with current air quality limits and for the purposes of this plan, each option has been thoroughly vetted. Please see Exhibit JNV-2.
- b. LG&E contributed the initial data on the existing air pollution control equipment and station's age, conditions, performance, design criteria, etc.. In addition, LG&E worked in concert with B&V on assessing potential technologies for each pollutant, the potential layouts of each technology, as well as a review of all B&V submitted draft reports. Various meetings were held at each station between B&V, Project Engineering, Environmental Affairs and the respective station management/engineering team to review balance-of-plant system capabilities, constructability issues such as safety and interference with station operations, delivery and lay down issues for construction, etc. LG&E and KU have completed construction projects for 6 SCRs, 6 WFGDs and a new 809 MW gross coal-fired unit within the last decade at various generating stations. We believe our knowledge of available technologies, constructability issues with the technologies, existing equipment at our stations, and market influences provided key input and support for B&V developing their final recommendations and estimates.

- c. Black and Veatch is a very large engineering and construction management firm that services a diverse group of clients in various industries throughout the U.S. We do not know how they interact with their other clients in relation to environmental issues.
- d. The Companies are not aware of technology recommendations Black and Veatch has made to their other clients, if any.

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Response to Commission Staff's First Information Request Dated July 12, 2011

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Question No. 61

Witness: Charles R. Schram

Q-61. Refer to Schram Testimony at page 5. Mr. Schram supports the position that the recommended projects result in the lowest Present Value Revenue Requirements ("PVR") over 30 years, including the impacts from capital investment and Operations and Maintenance (O&M) costs.

- a. Is 30 years a realistic time frame in the pollution control environment?
- b. Did you look at different time frames?
- c. If so, provide those calculations.

A-61. a. The use of a 30-year period for performing production cost analysis when determining PVR is consistent with over 20 years of different studies performed by the Companies and is consistent with the industry. Analysis in the pollution control environment should not be treated any differently than other PVR analysis. Pollution control is an integral part of analysis and operation of the entire system. Please see the response to Question No. 4.

- b. No for the reasons noted in the response to part a
- c. Not applicable.

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Response to Commission Staff's First Information Request Dated July 12, 2011

Case No. 2011-00162

Question No. 62

Witness: John N. Voyles, Jr. / Charles R. Schram

- Q-62. Refer to Schram Testimony. For each project to be constructed, provide the PV for every alternative that was considered and the reasons they were eliminated. Provide all supporting calculations.
- A-62. Please see Exhibits JNV-2 and CRS-1 for a complete description of the process of developing alternatives and the subsequent economic analysis. The NPVRR for each project to be constructed is included in Exhibit CRS-1. The economic analysis compares the cost of each environmental control project to the cost of retiring the unit.

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Response to Commission Staff's First Information Request Dated July 12, 2011

Case No. 2011-00162

Question No. 63

Witness: John N. Voyles, Jr.

Q-63. Refer to Schram Testimony. How was the estimated cost for each proposed project derived?

A-63. The estimated cost for each project was taken from the Companies' work with Black and Veatch which resulted in recommended projects to meet the emissions limits. Please see the details and discussions contained in Exhibit JNV-2 and the reports (inclusive of the cost estimates) from Black and Veatch contained in Appendices A – H of Exhibit JNV-2.

LOUISVILLE GAS AND ELECTRIC COMPANY

Response to Commission Staff's First Information Request Dated July 12, 2011

Case No. 2011-00162

Question No. 64

Witness: John N. Voyles, Jr.

Q-64. Refer to Schram Testimony. Did you send an RFP to construct the proposed facilities?

- a. If no, explain why it is not necessary.
- b. If yes, provide a list to whom it was sent and the responses. Also explain how the successful bidder was chosen.

A-64. a. No, a RFP to construct the proposed facilities has not been issued. Engineering and technology specification development was not mature enough to support issuing a RFP. LG&E is currently developing specifications to utilize in a RFP for the purchase of equipment and installation of environmental controls. The estimates contained in the Compliance Plan are reasonable for the purposes of evaluating and selecting technology for the Compliance Plan in this proceeding.

- b. Not applicable.

LOUISVILLE GAS AND ELECTRIC COMPANY

Response to Commission Staff's First Information Request Dated July 12, 2011

Case No. 2011-00162

Question No. 65

Witness: Shannon L. Charnas

Q-65. What is the impact of the planned retirements on LG&E's depreciation?

A-65. Consistent with past practices, ECR monthly filings will reflect the retirement of assets already included in base rates. LG&E's depreciation will decrease by the amount of expense applicable to the retired assets immediately upon their retirement. The next depreciation study completed and approved by the Commission will address any future impacts on the depreciation rates resulting from any remaining accumulative reserve amounts related to these retirements.

LOUISVILLE GAS AND ELECTRIC COMPANY

Response to Commission Staff's First Information Request Dated July 12, 2011

Case No. 2011-00162

Question No. 66

Witness: Robert. M. Conroy

Q-66. Are any costs associated with any retirements proposed to be recovered in this proceeding?

A-66. No, there are no costs associated with any retirements proposed to be recovered in this proceeding.