

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF LOUISVILLE GAS AND)	
ELECTRIC COMPANY TO MODIFY ITS)	CASE NO.
CERTIFICATE OF PUBLIC CONVENIENCE)	2012-00469
AND NECESSITY AS TO THE MILL CREEK)	
UNIT 3 FLUE-GAS DESULFURIZATION UNIT)	

COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
TO LOUISVILLE GAS AND ELECTRIC COMPANY

Louisville Gas and Electric Company ("LG&E"), pursuant to 807 KAR 5:001, is to file with the Commission the original and ten copies of the following information, with a copy to all parties of record. The information requested herein is due on or before December 14, 2012. Responses to requests for information shall be appropriately bound, tabbed and indexed. Each response shall include the name of the witness responsible for responding to the questions related to the information provided.

Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

LG&E shall make timely amendment to any prior response if it obtains information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which LG&E fails or refuses to furnish all or part of the requested information, it shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations.

1. Refer to LG&E's response to the Commission Staff's First Request for Information, Item 1.a., relating to the need for a one-year extension, from April 2015 until April 2016, for compliance with the Mercury and Air Toxins Standards ("MATS") rule.

a. Explain in detail the process for obtaining the required one-year extension to be in compliance with the MATS rule.

b. To be granted the one-year MATS extension, will LG&E be required to show a specific and documented electric-reliability concern consistent with the discussion on page 2 of the attachment to the response to the Commission Staff's First Request for Information, Item 7? If yes, explain in detail the basis upon which LG&E will support its request for the one-year extension.

c. Will LG&E be able to support a request for a one-year extension of the MATS rule even if it can maintain reliability by purchasing power from the market in lieu of operating Mill Creek Unit 3 during the April 2015 to April 2016 time frame?

d. Provide any cost-benefit analysis performed by or for LG&E that compares the Mill Creek Unit 3 retrofit scrubber as previously approved to the current proposal to construct a new scrubber and having to purchase power from April 2015 through April 2016 due to the inability to obtain a one-year extension of the MATS rule. If no such analysis has been performed, explain in detail the reasons why.



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Public Service Commission
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cc: Parties of Record

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