

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

INVESTIGATION OF KENTUCKY UTILITIES)	
COMPANY'S AND LOUISVILLE GAS &)	
ELECTRIC COMPANY'S RESPECTIVE NEED)	CASE NO.
FOR AND COST OF MULTIPHASE LANDFILLS)	2015-00194
AT THE TRIMBLE COUNTY AND GHENT)	
GENERATING STATIONS)	

COMMISSION STAFF'S POST-HEARING REQUEST FOR INFORMATION
TO KENTUCKY UTILITIES COMPANY AND LOUISVILLE GAS & ELECTRIC
COMPANY

Kentucky Utilities Company and Louisville Gas & Electric Company (collectively "the Companies"), pursuant to 807 KAR 5:001, Section 8, are to file with the Commission the original in paper medium and an electronic version of the following information. The information requested herein is due within seven days of this request. Responses to requests for information in paper medium 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.

The Companies shall make timely amendment to any prior response if they obtain 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 the Companies fail or refuse to furnish all or part of the requested information, they shall provide a written explanation of the specific grounds for their 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 filing a document containing personal information, the Companies shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the document so that personal information cannot be read.

1. Refer to the Companies' Joint Application, Exhibit 5, regarding the Trimble County Coal Combustion Residual Storage Project Update – Generation Planning & Analysis May 2015 (“May 2015 Analysis”).¹ The May 2015 Analysis evaluated the cost of the Trimble County Landfill project against the cost of retiring the Trimble County Generating Station and replacing the capacity and energy. The May 2015 Analysis evaluated the landfill and retirement alternatives under three gas price scenarios with limits on CO₂ emissions consistent with the U.S. Environmental Protection Agency’s (“EPA”) 2014 Clean Power Plan (“CPP”) proposal. For the CO₂ limits, the Companies utilized the proposed CPP rate-based goals of 1,844 lbs/MWh during the interim period

¹ Originally filed as Case No. 2015-00156, *Joint Application of Louisville Gas and Electric Company and Kentucky Utilities Company for Declaratory Order Concerning Construction of the Trimble County Landfill and Related Cost Recovery* (Filed May 22, 2015), and physically consolidated into the instant case by Order entered June 16, 2015.

2020-2029 and 1,763 lbs/MWh beginning in 2030 and beyond in modeling proposed state wide limits as a carbon-cap scenario for the Companies' generating fleet such that the units are economically dispatched to ensure that CO₂ emissions do not exceed the proposed cap.

a. All else remaining the same, revise the May 2015 Analysis utilizing the CO₂ rates established by the CPP that was finalized on August 3, 2015. For Kentucky, the final CPP rule established an interim rate-based goal of 1,509 lbs/MWh and a final rate-based goal in 2030 and beyond of 1,286 lbs/MWh.

b. The landfill alternative evaluated under the 2015 Analysis included the cost of the landfill as well as an assumed cost of \$220 million by 2020 to comply with the EPA's proposed effluent limitation guidelines ("ELG").

i. Provide a detailed breakdown of the items included in the ELG compliance costs and explain how the Companies arrived at this estimate.

ii. The EPA finalized the ELG rule for steam electric-power generators on September 30, 2015. Explain whether the final ELG rule has any impact on the ELG cost assumption used in the May 2015 Analysis. If so, include any necessary revisions in the updated analysis filed in response to part a. above.



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DATED OCT 26 2015

cc: Parties of Record

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