

*2005 NO_x
Compliance Strategy Update
for
Kentucky Utilities and
Louisville Gas and Electric*

January 2005

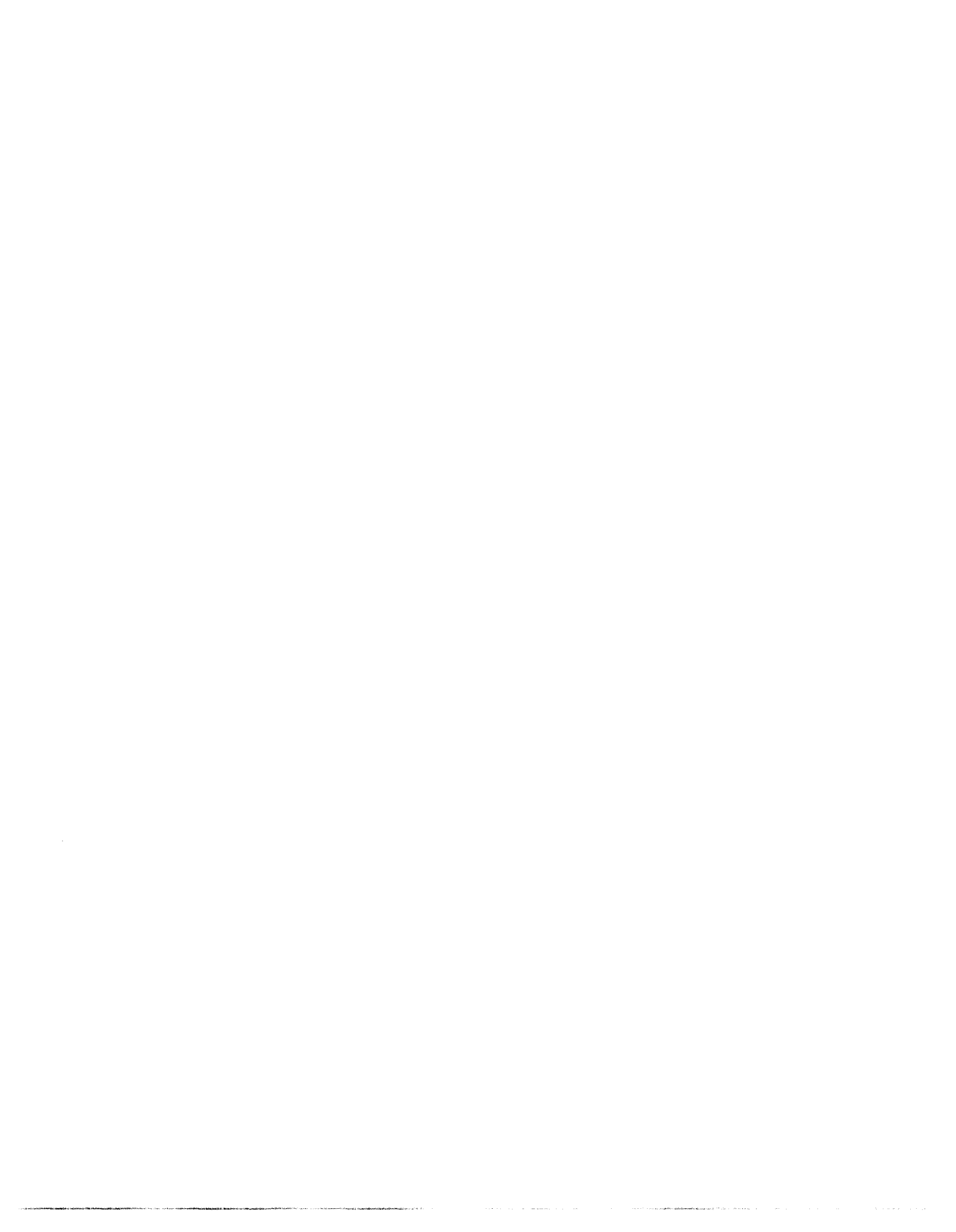


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Executive Summary

Kentucky Utilities Company and Louisville Gas and Electric Company (the "Companies"), as part of a continuing review of the environmental regulatory requirements for NO_x emission reduction under the Clean Air Act, have updated the analysis presented to the Kentucky Public Service Commission ("KPSC") as LEB Exhibit 2 of Bellar Testimony in Case No. 2000-386 and as LEB Exhibit 3 of Bellar Testimony in Case No. 2000-439. The Companies have performed an evaluation of the next steps in continued NO_x compliance. The study was conducted in January of 2005 and utilized the most recent information available at that time.

There have been several significant changes since the last study including a final ruling on the Companies' NO_x allowance allocation of 12,447 (assumed to be 11,875 in the previous study) and the initial compliance deadline of May 31, 2004 (assumed to be May 1, 2003 in the previous study). Other changes include the addition of early reduction credits ("ERCs"), retirement of Green River 1-2 and the update of NO_x emission rates for existing units.

Current projections indicate that, in absence of installing additional NO_x control technologies, the Companies will have sufficient NO_x allowances through the end of 2009 and would be dependent on purchasing 152,000 NO_x allowances over the 2010-2025 timeframe to comply. To mitigate the exposure created by purchasing such a large volume of allowances the construction of SCRs were evaluated at both Brown 3 and Ghent 2. The Ghent 2 SCR was more favorable, in that it reduced the PVRR by \$2 million compared to the Brown 3 SCR installed in the same year.

Assuming a three-year SCR construction schedule, the Companies anticipate being able to refine cost estimates and monitor the development of relevant issues (i.e. NO_x market etc) through the end of 2006 and still allow construction of the next technology in time to address the 2010 need.

The Companies will continue to maintain flexibility in their implementation of the NO_x compliance while keeping a close watch on legislative activities, technology enhancements, regulatory rulings and judicial actions in order to meet the on-going emissions reduction requirements in a prudent and least-cost manner.

I. Introduction

In August 2002 Kentucky Utilities Company and Louisville Gas and Electric Company (“Companies”), as part of a continuing review of the environmental regulatory requirements for NO_x emission reduction under the Clean Air Act, updated the analysis presented to the Kentucky Public Service Commission (“KPSC”) in Case No. 2000-386 and in Case No. 2000-439. That update was subsequently filed within the Companies’ 2002 Integrated Resource Plan (“IRP”) in Case No. 2002-00367. The current analysis, conducted in January of 2005, utilizes the most recent information available and serves to

- (1) Summarize the technologies currently installed and their performance during the 2004 ozone season (May 31 –Sept 30).
- (2) Quantify the Companies current position in regard to NO_x emissions.
- (3) Forecast future NO_x emissions and identify when the next NO_x removal technology is needed.
- (4) Provide preliminary estimates on the environmental impact and relative cost of subsequent SCR installations at various locations and times.
- (5) Develop a low cost, NO_x compliance strategy that maintains flexibility for future legislative, regulatory, or judicial changes.

II. Background

The NO_x SIP Call was promulgated under Title I of the Clean Air Act Amendments of 1990. Title I requires all areas of the country to achieve compliance with the National Ambient Air Quality Standards for ozone, or ground-level smog. In September 1998, the Environmental Protection Agency (“EPA”) finalized regulations (the NO_x SIP Call) to address the regional transport of NO_x and its contribution to ozone non-attainment in downwind areas. EPA’s final SIP Call requires 22 Eastern states (including Kentucky) and the District of Columbia to revise their State Implementation Plans (“SIPs”) to achieve additional NO_x emissions reductions that EPA mandated as necessary to mitigate the transport of ozone across the Eastern half of the United States. The final rule is intended to assist downwind states so that they can achieve compliance with the ozone standard. EPA maintains that NO_x emissions from the identified

states “contribute significantly” to non-attainment in downwind states and that the SIPs in these states are therefore inadequate and must be revised. The final rule required electric utilities in the 22-state area to meet a seasonal (May – September) NO_x tonnage limit beginning May 1, 2003. Subsequent amendments to the final rule changed the coverage of the program to just 19 states and extended the first season of compliance to begin May 31, 2004.

Directly related, Northeastern states filed “Section 126” petitions to the EPA to require reductions from certain electric utility plants (including all plants in and East of Louisville). EPA concurred and promulgated regulations requiring NO_x emission reductions very similar to those required under the NO_x SIP Call.

Eight states, the United Mine Workers of America (“UMWA”), and various industry groups appealed EPA's final NO_x SIP Call rule and the Section 126 rule to the U.S. Court of Appeals for the District of Columbia Circuit. The cases have been consolidated (State of Michigan v. EPA, No. 98-147) and the D.C. Circuit Court issued an order in December 1998 granting the parties' motion for expedited briefing to be completed by August 1999. On May 25, 1999, the D.C. Circuit issued an indefinite stay of the September 30, 1999 deadline for SIP submittal. Consequently, Kentucky suspended their NO_x SIP submittal efforts. The D.C. Circuit ruled against the appeal. However, due to delays in establishing a final regulatory program, on April 30, 2002 the compliance deadlines for both programs were harmonized to be May 30, 2004.

The EPA SIP Call NO_x emission tonnage cap went into effect during the ozone season (May through September) of 2004. The EPA set a utility NO_x budget in Kentucky of approximately 37,000 NO_x allowances for the ozone season. The number of NO_x allowances that the Companies would receive remained uncertain until April 11, 2002, when the USEPA approved the Kentucky Division for Air Quality's SIP submittal, which finalized that the Companies will receive 12,447 tons per ozone season for the years 2004-2006 after a 5% holdback for new sources.

III. Significant Changes Since the 2002 IRP

There have been several significant changes since the last study in 2002. The most significant changes are discussed in the following paragraphs.

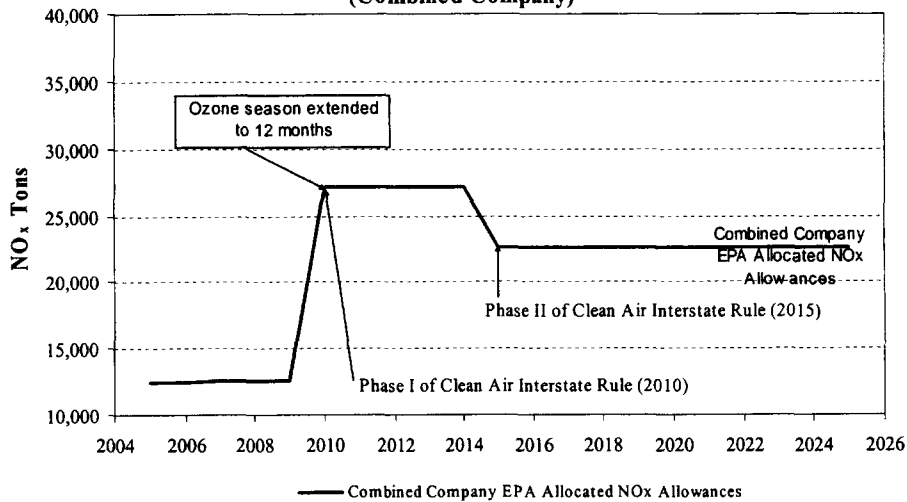
Allowance Allocation: The Kentucky allowances are distributed among units based on their heat input during previous ozone seasons. The initial allocation (2004-2006) is based on 1998-2000 heat input and the allowances associated with the 2004-2006 period remains unchanged in this analysis. The next NO_x allocation (for 2007-2009) will be based on 2001-2003 heat input, and so on. Currently the Companies' allocation for 2007-2009 is unknown, but is estimated to be 12,571. Allocations for subsequent time periods are shown below. The allocation by unit for the 2004- 2006 time period can be found in **Appendix B**.

EPA Allocated NO_x Allowances

Year	KU	LGE*	Total *
2004	6,764	5,683	12,447
2007	6,569	6,002	12,571
2010	14,814	12,295	27,109
2015	12,345	10,246	22,591

*Only LGE's portion of Trimble 1 (75%) allowances are included.

**Annual NO_x Emissions and Allowance Allocations
 (Combined Company)**



Clean Air Interstate Rule (“CAIR”) : On December 17, 2003, EPA proposed rules to require significant additional reductions/limits for SO₂ and NO_x, to further reduce Ozone and PM_{2.5} (“fine particulates”). These were published in the Federal Register on January 30, 2004. They would generally apply to the eastern 25-28 states (minus New England) and the District of Columbia (list of states provided below).

Implementation would be based on a “cap-and-trade” or “allowance program” similar to the Acid Rain and NO_x SIP Call Programs.

- EPA would allocate predetermined numbers of SO₂ and NO_x allowances to each state and the individual states determine how to allocate these to individual units.
- States will be allocated a set number of allowances annually during Phase I (2010-2014), and a reduced number of allowances annually during Phase II (2015 and beyond).
- NO_x emissions will count year-round (not just during the ozone season).
- States are to submit their State Implementation Plans (“SIPs”) for implementing the requirements within 18 months of EPA’s Final Rule.

In May 2004, EPA issued a Supplemental Rule, providing more details and model cap-and-trade programs for power plants that states may adopt to achieve required emissions reductions. EPA’s Fact Sheet issued with the Supplemental Rule states that it expects to complete this rulemaking by the end of 2004, which would make SIP submittals due in mid-2006. The EPA has subsequently delayed the completion of the rulemaking until March 2005. Expectations are that SIP submittals will be delayed until later in 2006 as a result. Because EPA has formally made a finding that certain states are significantly contributing to other states’ non-attainment of health-based air quality standards and has begun the rulemaking process, it is almost certain that reduction requirements of this nature will be finalized.

The EPA states that:

- SO₂ emissions would be reduced by 3.6 million tons in 2010 (approximately 40 percent below current levels) and by another 2 million tons per year when the rules are fully implemented (approximately 70 percent below current levels), and

- NO_x emissions would be cut by 1.5 million tons in 2010 and 1.8 million tons annually in 2015 (about 65 percent below today's levels).

Consistent with other recently completed environmental compliance evaluations, the restrictions imposed by CAIR are implemented beginning January 1, 2010 in this analysis.

Early Reduction Credits (“ERC”): As in the 2002 evaluation, the current study has incorporated an allocation of Kentucky’s ERCs. The 2002 evaluation used a conservative number of 1,500. Since the completion of the 2002 evaluation the final number of ERC has been determined. As such, this study reflects an actual allocation of early reduction credits totaling 2,841.

Base NO_x Emission Rates: The base NO_x emission rate for each unit was updated to reflect the unit’s most recent emission rate. This included reflecting the installation of new NO_x control technology additions where appropriate. The Base NO_x emission rates for each unit can be found in **Appendix A**.

Retirement of Green River Units 1-2: Green River Units 1 and 2 were completed in 1950 and provided 25 MW of gross generation each. In 2003, these units were 53 years old. Having operated past their design lives, these units ran a greater risk of catastrophic failure than other units. The challenges facing the units, the necessary actions to remedy those situations as well as their associated cost were explained in detail in the evaluation titled *Phase II Evaluation of the Economic Viability of Green River Units 1 and 2*. The aforementioned evaluation was provided to the KPSC in Case No. 2003-00434, Response 15.b(1) in the Second Data request of the Commission Staff. Green River Units 1 and 2 were operationally retired December 31, 2003 for economic reasons and subsequently have been removed from the current analysis.

IV. 2004 Ozone Season Compliance

The period of May 31, 2004 through September 30, 2004 was the “first ozone season” in which the Company had to comply with the EPA’s SIP Call NO_x emission tonnage cap. The 2004 ozone season NO_x emissions for the combined companies met the regulatory requirements by a margin of 39% (5,987/15,288). Results for the first ozone season are shown in the table below. The margin calculation of 39% includes ERCs and the full five-month NO_x allowances granted

to the Companies by the EPA for the 2004 ozone season. The 5,987 NO_x allowances that were not surrendered remain in the bank of credits available to the corporation for future emissions. The Companies NO_x allowance bank is now approximately 50% of the allowances awarded for a full ozone season.

2004 OZONE SEASON PERFORMANCE SUMMARY

Actual NO_x Emissions vs. NO_x Allowances Allocated

	EPA Annual Allocation (2004-2006)	Total Early Reduction Credits (ERCs)	Total NO_x Allowances Available	Actual NO_x Emissions (May 31-Sep 30)	Variance in NO_x Emissions
KU Total	6,764	954	7,718	5,162	-2,556
LGE Total	<u>5,683</u>	<u>1,887</u>	<u>7,570</u>	<u>4,139</u>	<u>-3,431</u>
Combined Companies	12,447	2,841	15,288	9,301	-5,987

Notes:

Negative indicates actual emissions were below the EPA allowance levels.

Allowance allocations and emissions based on LGE's 75% ownership of Trimble County 1

Excess Allowance Margin: 39%

As explained previously, 2004 NO_x emission allowances were granted for May 1 – September 30, but emissions reporting requirements in 2004 were May 31- September 30. By estimating the NO_x allowances for May 31 – September 30, and comparing the actual emissions for the same time period, it can be determined that the Companies complied with regulations by a margin of 9% during the May 31 – September 30 reporting period. This approach more accurately reflects the performance of the Companies NO_x reduction systems during the 2004 regulatory period.

2004 Reporting Season Performance Estimate

Actual NO_x Emissions vs. NO_x Allowances Allocated

	Estimated EPA Annual Allocation (May 31-Sep 30)	Actual NO_x Emissions (May 31-Sep 30)	Variance in NO_x Emissions
Combined Companies	10,267	9,301	-966

Excess Allowance Margin: 9%

Notes:

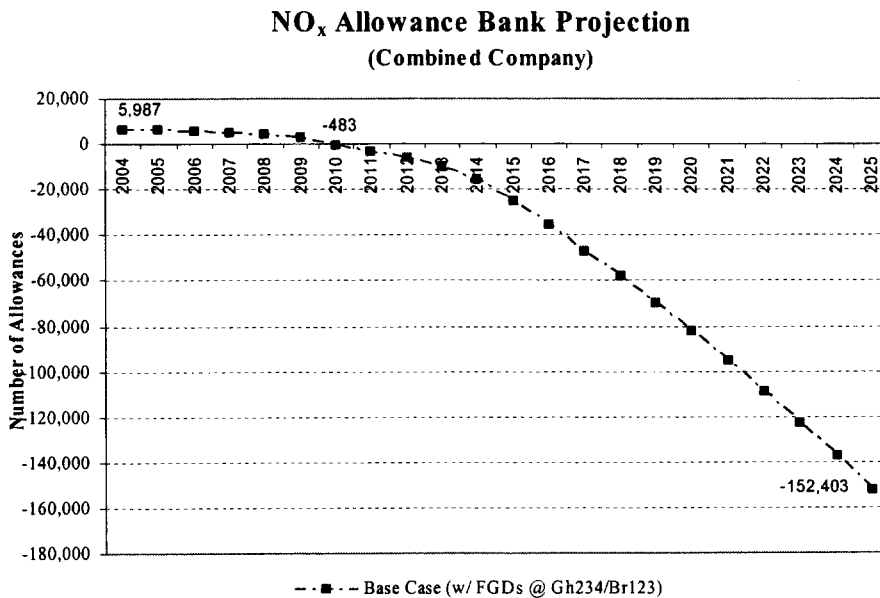
Negative indicates actual emissions were below the EPA allowance levels.

Allowance allocations and emissions based on LGE's 75% ownership of Trimble County 1

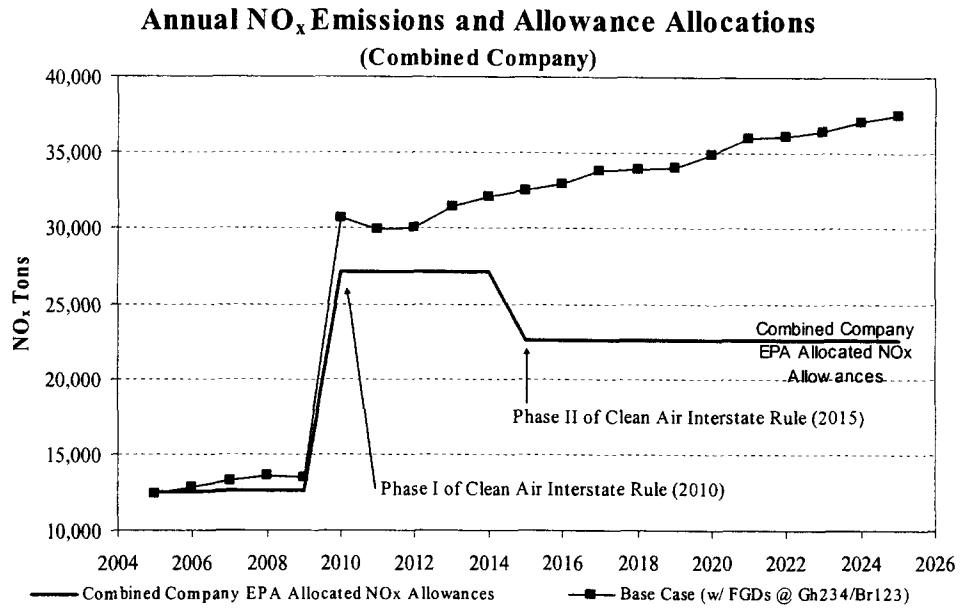
IV. Current NO_x Allowance Position

Projections indicate that the banking of NO_x allowances will not continue over the long-term. In fact, in absence of the installation of additional NO_x control technologies the Companies are

expected to begin to draw down the number of banked NO_x allowances starting in 2005. Projections are that the Companies will experience a shortfall of 483 tons by the end of year 2010. Once depleted the Companies must either reduce NO_x emissions, purchase NO_x allowances from the allowance market or a combination of both. The total number of allowances projected to be purchased in absence of implementing additional NO_x control would exceed 152,000 tons. The following graph shows the depletion of the Companies' NO_x allowance bank over time. A detailed study entitled *2004 SO₂ Compliance Strategy* was completed in November of 2004. This analysis assumes the SO₂ control technologies recommend by the November 2004 analysis are implemented and are a part of the Base Case plan.

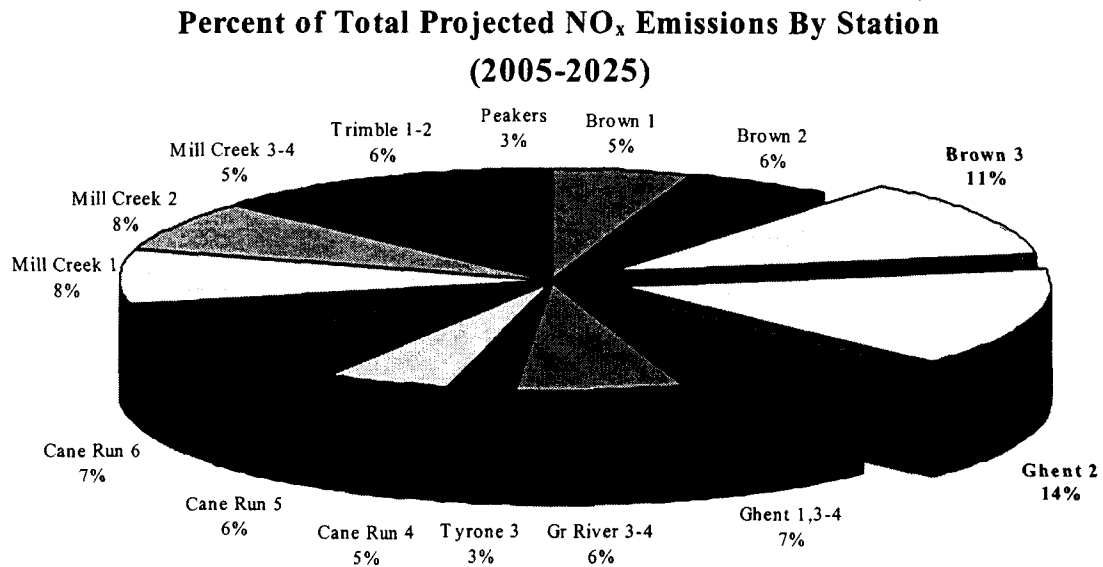


The following figure depicts the Companies' projected ozone season NO_x emissions and anticipated annual allowance allocations. CAIR Phase I will increase the Companies' annual



NO_x allowance allocation to 27,109 tons, based on a 12 month ozone season. Projected emissions during the same time are expected to increase to over 30,000 tons annually.

Logically, NO_x control technologies should be constructed at those locations which are projected to be the major contributors to the Companies' NO_x allowance shortfall.



The most significant contributors to the Companies' NO_x emissions over the next twenty years are projected to be Ghent 2 and Brown 3. Together, these two units comprise over 25% of the Companies' future NO_x emissions. Any long-term compliance strategy must, at a minimum, reduce the NO_x emissions from these two locations.

V. NO_x Compliance Plan Analysis

The Companies conducted the new analysis using the detailed production cost model, PROSYM™, and a detailed financial model, Strategist's Capital Expenditure and Recovery ("CER") module.

PROSYM™ can perform a detailed analysis that takes into consideration the following items:

- Economic dispatch
- NO_x-affected dispatch
- Ability to purchase NO_x allowances
- New units
- Multi-year compliance
- Consideration of all units in NO_x tonnage cap
- More detailed calculation of revenue requirements

PROSYM™ is capable not only of simulating the economic dispatch of the generating units but also of simulating the NO_x-affected dispatch of the generating units. **Appendix B** contains some general study assumptions including a summary of financial assumptions used in the CER and the market price forecast for SO₂ and NO_x allowances. Note that the assumptions used in this update are identical to the assumptions used in the Companies' *2004 SO₂ Compliance Strategy*. The CER module of Strategist allows the user to examine the book, tax, and regulatory accounting effects for construction alternative(s) and calculates the present worth of revenue requirements for each project

Discussion of Alternatives

The Companies' approach to NO_x compliance is currently and has been in the past to "over-comply" on some units rather than devising a plan that would lower each individual unit's NO_x emissions to levels below its allocated allowances. The excess allowances from the units that over-comply would be used toward the units that did not have the allowances needed to comply.

This is the same approach taken by the Companies for SO₂ compliance purposes. To address the Companies' projected shortfall, and for purposes of this update, the SCR technology was the only NO_x emission reduction technology evaluated. SCRs are a proven technology and one in which the Companies have operational experience. The SCR retrofits were considered at Brown 3 and Ghent 2 and were installed in 2010; the year in which current projections indicate the Companies will NO_x allowance bank will become depleted.

The table below enumerates the four options considered in this evaluation. Option 0, which is the Base Case, has no additional NO_x control technologies installed other than what exists on the Companies' generation system today and would represent a 100% reliance on the NO_x allowance market. It should be noted that dependence on the allowance market does not come without risk. **Appendix F** shows that the NO_x allowance market varied greatly in 2004, varying from a minimum of \$1,735/ton to a maximum of \$2,750. As previously mentioned, the Base Case does assume the Companies will meet its SO₂ Compliance shortfall as recommended in the *2004 SO₂ Compliance Strategy*.

Individual NO_x Control Alternatives

Option	Description	NO _x Technology	Total Capital
		In-Service Date	Cash Flow (\$000)
0	Base Case	n/a	n/a
1	Brown 3 SCR	January 1, 2010	\$76,416
2	Ghent 2 SCR	January 1, 2010	\$92,544
3	Ghent 2 SCR	January 1, 2008	\$87,232
4	Brown 3 SCR	January 1, 2016	\$91,243

Notes:

Total Capital Cash Flow (\$000)" represents the sum of annual construction costs.

Detailed inputs including fixed and variable O&M expenses, derates and NO_x reduction percentages associated with each technology can be found in **Appendix C**.

In order to develop a least cost strategy, the individual alternatives were also combined in an effort to further reduce the revenue requirements associated with NO_x compliance. As a result, six different cases were modeled (including the Base Case) and evaluated to determine which plan produced the least cost revenue requirements. The following defines the six cases evaluated.

Definitions of Cases Evaluated

- Base Case: (Option 0) Starting point for this update and assumes existing NO_x control equipment only (i.e. No additional NO_x control equipment is placed in-service during the study period). Assumes scrubbers are installed at Ghent 2-4 and Brown 1-3 as recommended in *2004 SO₂ Compliance Strategy*. Allowances are purchased on an as-needed basis in the year of need and environmental dispatch on the Companies' generation system continues.
- Case01: (Base Case + Option 1) Constructs an SCR in the Base Case on Brown 3 in 2010. Allowances are purchased on an as-needed basis in the year of need and environmental dispatch on the Companies' generation system continues.
- Case02: (Base Case + Option 2) Constructs an SCR in the Base Case on Ghent 2 in 2010. Allowances are purchased on an as-needed basis in the year of need and environmental dispatch on the Companies' generation system continues.
- Case03: (Base Case + Option 3) Constructs an SCR in the Base Case on Ghent 2 in 2008. Allowances are purchased on an as-needed basis in the year of need and environmental dispatch on the Companies' generation system continues.
- Case04: (Base Case + Option 1 + Option 2) Constructs an SCR in the Base Case on Brown 3 in 2010 and Ghent 2 in 2010. Allowances are purchased on an as-needed basis in the year of need and environmental dispatch on the Companies' generation system continues.
- Case05: (Base Case + Option 2 + Option 4) Constructs an SCR in the Base Case on Ghent 2 in 2010 and Brown 3 in 2016. Allowances are purchased on an as-needed basis in the year of need and environmental dispatch on the Companies' generation system continues.

A production cost projection (using PROSYMTM model) and a capital cost projection (using the CER model) was made for each case. Any NO_x (or SO₂) allowance shortfall could be purchased from the respective allowance market at the forecasted market prices for that year as shown in **Appendix B**. Consistent with other studies of this type, allowances transfers between Companies were permitted for compliance.

Results of Analysis

The table below summarizes the results of the six Case runs. For ease of comparison the total present value revenue requirement (“PVRR”) of each Case has been categorized into four areas:

1. Production Costs: represent the revenue requirements associated with fuel, fixed and variable operation and maintenance expenses and purchased power expenses
2. NO_x Allowance Costs: represent the revenue requirements associated with the purchasing of any NO_x allowances.
3. SO₂ Allowance Costs: represent the revenue requirements associated with the purchasing of any SO₂ allowances.
4. Capital Costs: represent the revenue requirements associated with any capital expenditures for the case.

In addition to cost information, other relevant information pertaining to each Case is shown. Information such as the total number of SO₂/NO_x allowances purchased over the study period and the year in which the SO₂/NO_x allowance bank is depleted.

Case Summary										
(Assuming: Base Capital Costs, Base SO ₂ /NO _x Forward Price Forecast)										
(All Costs in 2005 PVRR \$1000)										
ALL CASES COMPARED TO Base Case (Trimble 2 In-service 2010, Wet FGD HS GH234, Wet FGD HS BR123)										
Case	Production Cost	NO _x Allowance Cost	SO ₂ Allowance Cost	Capital	Total	Incremental over Base	First Year of SO ₂ Allowance Purchase	First Year of NO _x Allowance Purchase	Total SO ₂ Allowances Purchased	Total NO _x Allowances Purchased
Base Case	13,671,906	147,085	164,055	813,000	14,796,046	Base	2008	2010	677,793	152,403
Case02- Base + Gh2 SCR 2010	13,689,616	74,637	163,269	905,256	14,832,778	36,732	2008	2016	674,933	81,109
Case01- Base + Br3 SCR 2010	13,893,847	88,738	162,986	889,174	14,834,745	38,699	2008	2015	674,034	94,476
Case03- Base + Gh2 SCR 2008	13,691,231	70,149	163,204	913,044	14,837,629	41,583	2008	2016	674,747	77,371
Case05- Base + Gh2 SCR 2010, Br3 SCR 2016	13,700,985	39,843	162,783	964,988	14,868,599	72,553	2008	2016	672,861	44,070
Case04- Base + Br3 & Gh2 SCR 2010	13,712,103	19,618	162,187	981,431	14,875,339	79,293	2008	2021	671,063	24,530

The PVRR of each Case is compared to that of the Base Case. The Base Case is the first case listed in the table. All other cases follow in increasing order of PVRR. For example, Case02 is \$36.732 million (PVRR) more expensive than the Base Case but significantly reduces the

dependence on the NO_x allowance market by delaying the first year of NO_x allowance market purchases until 2016. The table above is summary of the annual data associated with comparing each Case to the Base Case, which can be found in **Appendices D and E**. **Appendix E** further breaks down the annual data and contains a by unit summary of the NO_x emission rates and annual tons emitted by each unit in the Companies' generation system.

The following is a detailed description of the results of each case.

Base Case - is a case where no NO_x compliance options were implemented except for an emission dispatch adder for NO_x. PROSYMTM penalized the dispatch cost of each unit based on the unit's expected NO_x emissions at a rate equal to the forecast price of NO_x allowances as shown in **Appendix B**. This emission affected dispatch is identical in implementation to the SO₂ adder that has been in use since 1995 for the KU system and since 2000 for the LG&E system. The NO_x adder is in addition to the SO₂ adder. The case emits 605,043 tons of NO_x from 2005 through the end of the study period.

The PVRR is \$14,796 million and consists of \$13,671 million in production costs and \$813.0 million in capital costs (these costs are for the wet scrubbers at Ghent and Brown and associated Brown Ash pond work), \$164.1 million in SO₂ allowance market purchases and \$147.1 million in NO_x allowance market purchases. The Companies deplete their combined NO_x allowance bank and are forced to procure NO_x allowances from the market beginning in 2010. As with other plans that follow, the production costs are for total system and the capital costs are due only to environmental compliance options.

This case is shown only for comparison purposes. It is highly unlikely that the Companies would be able to purchase enough allowances to comply with the regulation. In addition, having to obtain such a large volume of allowances would most likely drive up the overall allowance purchase price.

Case01-Br3 SCR in 2010- is a case developed to evaluate the economics of installing an SCR on Brown 3 at the time the Companies' depletes its NO_x allowance bank. In this case, the Brown 3 SCR would be the Companies' next and only NO_x control technology installed. Case01 reduces the annual NO_x emissions by approximately 3,500 tons. With total NO_x emissions over the study

period reduced to just over 547,100 tons, the depletion of the NO_x bank is delayed until 2015. The total amount of NO_x allowances purchased in this case was second only to the Base Case with over 94,400 NO_x allowances purchased over the study period.

The PVRR is \$14,834 million and consists of \$13,693 million in production costs, \$889.2 million in capital costs, \$163.0 million in purchased SO₂ allowances and \$88.7 million for the purchase of NO_x allowances. The total PVRR of this case exceeds those of the Base Case by \$38.7 million. This case meets the requirements of the annual NO_x tonnage limits through 2015 and complies through the end of the study period by purchasing NO_x allowances.

Case02-Gh2 SCR in 2010- is a case developed to evaluate the economics of installing the Ghent 2 SCR instead of the Brown 3 SCR at the time the Companies' NO_x allowance bank is projected to expire. In this case, the Ghent 2 SCR would be the next and only NO_x control technology installed. All other technologies are the same as in the Base Case for all units. The Ghent 2 SCR results in a reduction in the annual NO_x emissions by over 4,000 tons from the Base Case.

The PVRR of this case is \$14,832 million and consists of \$13,689 million in production costs, \$905.3 million in capital costs, \$163.3 million for the purchase of SO₂ allowances and \$74.6 million for the purchase of NO_x allowances. The total cost of Case02 exceeds the Base Case by \$36.7 million. Construction of the Ghent 2 in 2010 delays until 2016 the need to purchase NO_x allowances. Compliance through the end of the study period is obtained by purchasing of NO_x allowances.

The detailed PROSYMTM runs confirm that the Ghent 2 SCR in 2010 is approximately \$2.0 million more favorable than construction of an SCR on Brown 3 in the same year. This case also has a cumulative PVRR of \$36.7 million more than the Base Case.

Case03-Gh2 SCR in 2008- is Case02 but with the Ghent SCR installation schedule accelerated to allow for an in-service date of 2008. All other technologies are the same for all units. The purpose of this case was to evaluate whether or not accelerating the most attractive SCR option (Ghent 2 in 2010) improves the economics over a 2010 install. The results indicate that installing the Ghent 2 SCR in 2010, based on the assumptions used in this analysis, is more favorable than, installation in 2008.

The PVRR is \$14,837 million, approximately \$5 million higher than a 2010 installation of the Ghent 2 SCR. While NO_x purchase cost decreased by about \$5 million, the increase in capital costs of \$10 million associated with accelerating the project offset any potential benefits compared to Case02. This case also has a cumulative PVRR of \$41.5 million more than the Base Case.

Case04-Gh2 SCR 2010, Br3 SCR 2010- is a case that combines the most attractive Ghent 2 SCR option (Ghent 2 SCR in 2010) with the Brown 3 SCR in 2010. The purpose of this case was to evaluate the economics associated with a simultaneous installation of SCRs at Ghent and Brown. This case reduces the number of NO_x allowances purchased and NO_x tons emitted to the lowest of any of the cases evaluated in this update. By reducing NO_x emission to 477,170 tons over the study period, a shortfall of only 24,530 tons remained with the first NO_x allowance market purchase not occurring until 2021.

The PVRR associated with this case is \$14,875 million and consists of \$13,712 million in production costs, \$981.4 million in capital costs, \$162.2 million for the purchase of SO₂ allowances and \$19.6 million for the purchase of NO_x allowances. While the total cumulative cost for this case is higher than the Base Case there is substantially less NO_x market exposure associated with the simultaneous installations of SCRs at Ghent and Brown. This case also has a cumulative PVRR of \$79.3 million more than the Base Case.

Case05-Gh2 SCR 2010, Br3 SCR 2016- is Case02 with an SCR added at Brown 3 in 2016. The year 2016 is the first year that Case02 was required to make NO_x allowance market purchase in order to comply. The purpose of this case is to determine whether it is less costly to delay the Brown SCR until the year in which the NO_x allowance bank would, in absence of an SCR at Brown 3, become depleted. This case reduces the number of NO_x emissions over the study period to 496,710 tons from 605,043 tons in the Base Case and begins NO_x allowance market purchases in 2016, just as in Case02. So the installation of the Brown 3 SCR in January of 2016 does not reduce NO_x emission enough to delay the need to participate in the NO_x allowance market. This case required the purchase of 44,070 NO_x allowances through the end of the study period, second only to Case04 for the fewest in any of the cases evaluated.

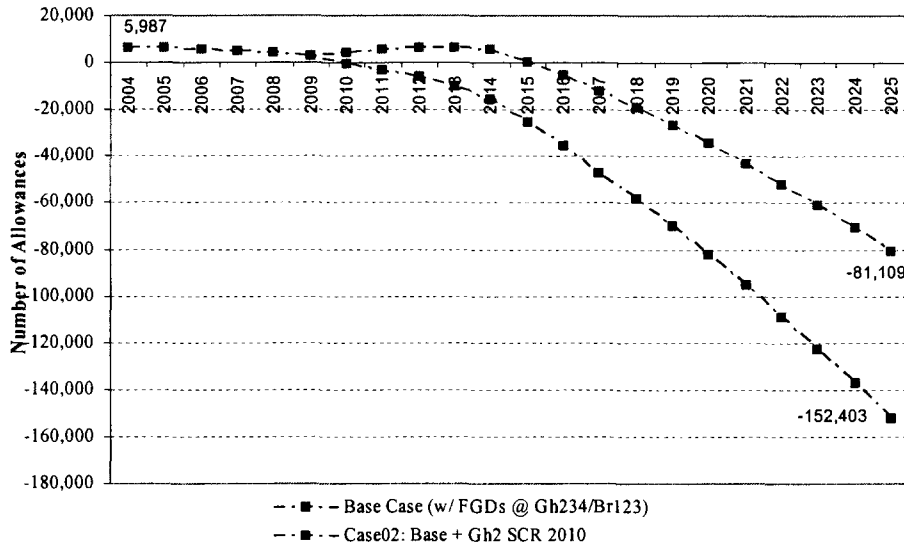
The PVRR is \$14,868 million and consists of \$13,700 million in production costs, \$965.0 million in capital costs, \$39.8 million for the purchase of NO_x allowances and \$162.8 million for the purchase of SO₂ allowances. The total cumulative cost for this case is less than Case04, so the delay of the Brown 3 SCR until 2016 was favorable to the economics by approximately \$7 million (compared to Case04). However, the Case still has a cumulative PVRR of over \$72.5 million more than the Base Case.

As previously mentioned an annual summary of all the case costs and emissions can be found in **Appendices D and E** of this document.

V. Summary and Recommendation

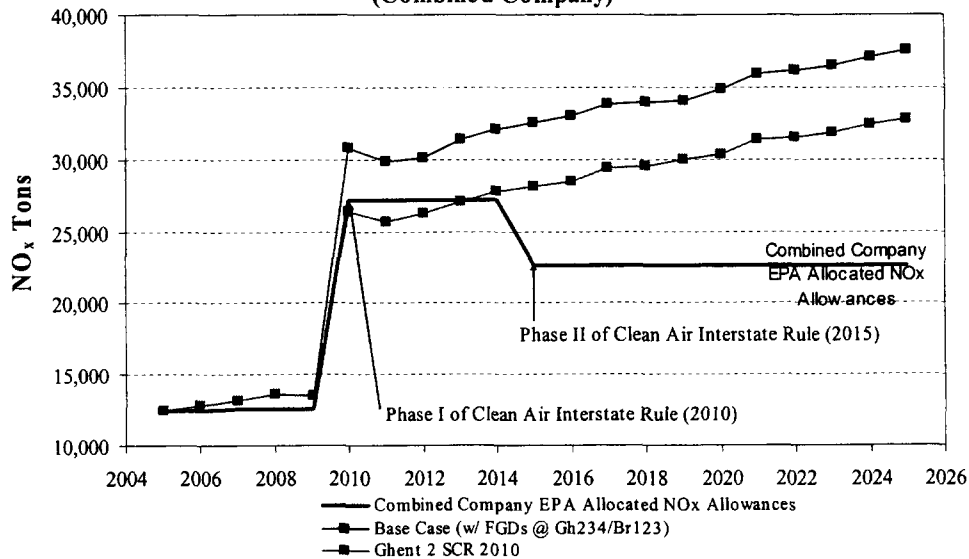
NO_x control equipment currently installed on the Companies' generation system is projected to be sufficient until the 2010 timeframe when the NO_x allowance bank is expected to become depleted. This coincides with Phase I of the CAIR. At that time the Companies will have to further reduce NO_x emissions, purchase NO_x allowances from the allowance market or a do both. This evaluation considered SCR installations at the two largest sources of NO_x emissions on the Companies system; Ghent 2 and Brown 3, the purchasing of allowances and a combination of new SCR installations and purchasing of NO_x allowances. Of the cases considered in this evaluation, the construction of an SCR on Ghent 2 in 2010 is the least cost manner in which the Companies can lessen reliance on the NO_x allowance market and is slightly more favorable than an SCR on Brown 3. While the 2010 SCR at Ghent 2 does reduce NO_x allowance market purchases from 152,000 to just over 81,000 it does not eliminate the Companies' dependence on the NO_x allowance market for compliance beginning in 2016.

NO_x Allowance Bank Projection (Combined Company)



Compared to the Base Case the Ghent 2 SCR is projected to reduce annual NO_x emissions by 4,000-5000 tons enabling the Companies' NO_x allowance bank to increase during the 2010-2013 time period. In 2013, the bank reaches a level of just over 6,400 tons and is once again depleted by 2016, the 2nd year of CAIR Phase II.

Annual NO_x Emissions and Allowance Allocations (Combined Company)



Based on the current analysis the Companies should plan for additional NO_x control technologies being required around 2010 in order to comply with environmental legislation. Given the large volume of NO_x allowances projected to be purchased from the NO_x allowance market in absence of additional controls, the Companies should continue to refine cost expectations pertaining to an SCR being constructed at Ghent 2 and at Brown 3. This analysis favors the installation of an SCR at Ghent 2 over that of Brown 3, but monitoring the construction costs at both locations should be continued to confirm the relative benefits of Ghent 2 over Brown 3 exist as the 2010 time period approaches. Assuming a three-year SCR construction schedule, the Companies anticipate being able to refine cost estimates and monitor the development of relevant issues (i.e. NO_x market etc) through the end of 2006 and still allow construction of the next technology in time to address the 2010 need.

The Companies will continue to maintain flexibility in their attainment of NO_x compliance while keeping a close watch on legislative activities, technology enhancements, regulatory rulings, and judicial actions in order to meet the on-going emissions reduction requirements in a prudent and least-cost manner.

APPENDIX A

Base NO_x Emission Rates

<u>Unit</u>	<u>NO_x Emission (lb/Mbtu)</u>	<u>Unit</u>	<u>NO_x Emission (lb/Mbtu)</u>
Brown 1	0.500	Cane Run 4**	0.320
Brown 2	0.320	Cane Run 5**	0.341
Brown 3	0.270	Cane Run 6**	0.274
Ghent 1	0.380	Mill Creek 1**	0.250
Ghent 2	0.300	Mill Creek 2*	0.250
Ghent 3*	0.035	Mill Creek 3*	0.037
Ghent 4*	0.035	Mill Creek 4*	0.035
Green River 3	0.390	Trimble 1*	0.035
Green River 4	0.380	Cane Run 11	0.440
Tyrone 1	0.200	Paddy's Run 11	0.440
Tyrone 2	0.200	Paddy's Run 12	0.440
Tyrone 3**	0.3400	Paddy's Run 13	0.090
Brown 5	0.090	Trimble 5	0.056
Brown 6	0.090	Trimble 6	0.056
Brown 7	0.090	Trimble 7	0.056
Brown 8	0.120	Trimble 8	0.056
Brown 9	0.120	Trimble 9	0.056
Brown 10	0.120	Trimble 10	0.056
Brown 11	0.120	Waterside 7	0.440
Haefling	0.440	Waterside 8	0.440
		Zorn	0.440

* Unit has increased rate at low load levels.

**Varies, value shown is unit's minimum emission rate.

APPENDIX B

General Assumptions

- Study Period: 20-year period for Production Cost impacts (2005-2025)
30-year period for Capital Costs impacts (2005-through book life of project)

The production costs include items such as fuel, O&M, purchase power etc and are estimated using the PROSYMTM production model. This model was run for the 2005-2025 time period.

The revenue requirements associated with capital costs are determined via the Capital Expenditure and Recovery module of the Strategist production and capital costing software. Capital projects with a 20 year book/tax life and an in service date after 2005 would have the last years of their life excluded from the revenue requirement calculation if capital costs impacts were halted at 2025. Doing so would have the affect of underestimating the capital cost of alternatives and would favor construction of new projects. Therefore, to completely account for capital projects costs over their lifetime, the revenue requirements associated with new capital projects were extended through the end of their book life.

- KU/LGE continues as a regulated entity subject to the oversight of the Kentucky Public Service Commission and that the Commission continues the requirement of the Companies implementing the least cost strategy to the benefit of the native load ratepayers.
- The capital costs, O&M costs and the costs of increased emissions (both NO_x and SO₂) associated with the addition of new environmental projects will be subject to recovery through the Environmental Cost Recovery mechanism.

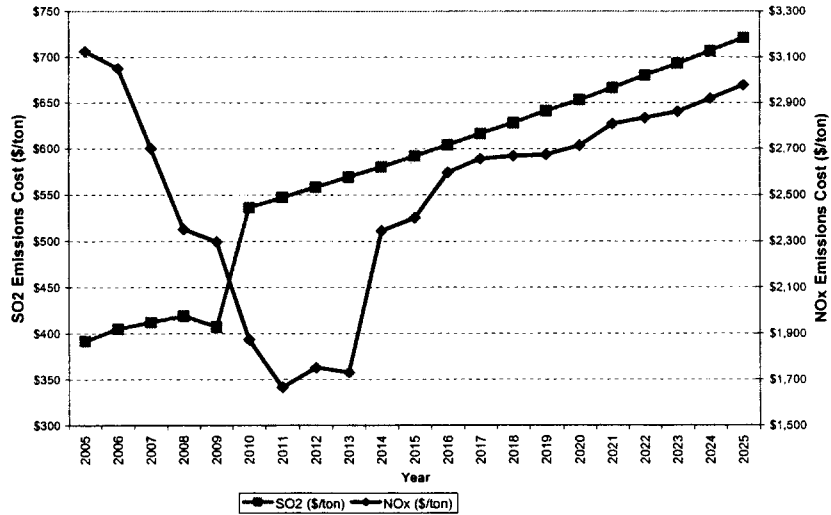
- Financial Data

➤ Discount Rate (%):	7.26 %
➤ Federal Income Tax Rate (%)	40.36 %
➤ AFUDC Rate (%):	7.26 %
➤ Insurance Rate (%):	0.07 %
➤ Property Tax Rate (%):	0.18 %
➤ Percentage of Debt in Capital Structure (%):	46.06 %
➤ Debt Interest Rate/Weighted Cost of Debt (%):	3.16 %
➤ Desired Return on Rate base (%):	7.26 %
➤ Capitalized Interest Debt Rate (%):	3.16 %
➤ Environmental Projects Book Life (years):	20 years
➤ Environmental Projects Tax Life (years):	20 years
➤ Annual capital cost escalation rate (%):	3.0%
➤ Annual Fixed O&M escalation rate (%):	2.0%
➤ Annual Variable O&M escalation rate (%):	2.0%

- No unit retirements occur on the Companies' generating system within the study period.

• SO₂ and NO_x Emission Costs (Base Assumptions)

	Market Cost per ton of	
	SO ₂ (\$/ton)	NO _x (\$/ton)
2005	392	3125
2006	405	3050
2007	412	2700
2008	419	2350
2009	407	2298
2010	536	1874
2011	547	1666
2012	558	1752
2013	569	1731
2014	580	2344
2015	592	2400
2016	604	2596
2017	616	2656
2018	628	2668
2019	641	2674
2020	653	2713
2021	666	2807
2022	680	2833
2023	693	2861
2024	707	2918
2025	721	2977



• NO_x Allocation By Unit (2004-2006 Ozone Seasons)

Unit	NO _x Allowances
Brown 1	235
Brown 2	346
Brown 3	831
Brown 6	7
Brown 7	9
Brown 8	46
Brown 9	44
Brown 10	41
Brown 11	32
Ghent 1	1093
Ghent 2	1090
Ghent 3	1104
Ghent 4	1113
Green River 1&2	107
Green River 3	197
Green River 4	242
Pineville 3	79
Tyrone 1&2	5
Tyrone 3	143
Cane Run 4	389
Cane Run 5	360
Cane Run 6	420
Mill Creek 1	784
Mill Creek 2	719
Mill Creek 3	978
Mill Creek 4	1058
Paddys Run 12	4
Trimble Count 1	971
Total	12,447

Note:
 Only LG&E portion of Trimble County 1's allowances are included.

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- Fuel Forecast (Base Assumptions)
 - Any and all fuel cost savings associated with serving native load will be returned to the ratepayer through the Fuel Adjustment Clause mechanism.

Annual Average Fuel Forecast
 (cents/mmBtu)

SO ₂ content	Brown		Ghent 1	Ghent 2-4		Gr River	Tyrone 3	Cane Run	Mill Creek	Trimble	HAEF			
	0.9 #	1.20#	2.75 #	6.36#	0.9#	1.20#	6.10#	4.56#	1.80#	6.05#	6.09#	6.50#	Oil	Gas
>														
2005														
2006														
2007														
2008														
2009														
2010														
2011														
2012														
2013														
2014														
2015														
2016														
2017														
2018														
2019														
2020														
2021														
2022														
2023														
2024														
2025														

APPENDIX C

Detailed Cost and Operations Assumptions

	Option Number			
	1	2	3	4
	<u>Brown 3 SCR</u>	<u>Ghent 2 SCR</u>	<u>Ghent 2 SCR</u>	<u>Brown 3 SCR</u>
	Jan-10	Jan-10	Jan-08	Jan-16
NO _x Control Technology In-Service Year				
NO _x Removal (%)	89%	90%	90%	89%
Post Tech. NO _x Emission Rate (#NO _x /mmBtu)*	0.03	0.03	0.03	0.03
Incremental Variable O&M (Nominal Yr \$/MWH)	0.3500	0.3334	0.3205	0.3942
Derate (MW)	2	2	2	2
Incremental Fixed O&M (Nominal Yr \$000/yr)	\$490	\$433	\$416	\$551
Lump Sum Cash Flow (Nominal Yr \$000)**	\$76,416	\$92,544	\$87,232	\$91,243

Notes:

All costs are incremental costs. Fixed and Variable costs escalate at 2% annually. Capital costs are escalate at 3% annually.

*Higher than shown NO_x emission rates at low generation levels. Represents 90% reduction in NO_x or a floor of 0.03 #NO_x/mmBtu.

**Capital expenditures are completed one year prior to "NO_x Control Technology In-Service Year" to allow technology to be in-service January 1.

APPENDIX D

Confidential Information Redacted

Cost Comparison of Alternative NO _x Compliance Plans All Costs in 2005 PVRR \$ x1000												
Case02: Base + Gh2 SCR 2010						Base Case						SO ₂ Price Curve Multiplier
Fuel Forecast: Base Load Forecast: Base SO ₂ Price Forecast: Base NO _x Price Forecast: Base Other Description: SO ₂ Dispatch, TC2 '10 WFGD HS BR123 & GH2 SCR '10						Fuel Forecast: Base Load Forecast: Base SO ₂ Price Forecast: Base NO _x Price Forecast: Base Other Description: SO ₂ Dispatch, TC2 2010, No Br3 SCR WFGD HS BR123 & GH2 HS GH234						1.00
SO ₂ Environmental Controls:						SO ₂ Environmental Controls:						DIFFERENCE
Unit SO ₂ Tech SO ₂ Rem % Cost (\$/M3) In-Service						Unit SO ₂ Tech SO ₂ Rem % Cost (\$/M3) In-Service						CALCULATIONS
Brown 1 FS HS-Wet FGD 2009						Brown 1 FS HS-Wet FGD 2009						
Brown 2 FS HS-Wet FGD 2009						Brown 2 FS HS-Wet FGD 2009						
Brown 3 FS HS-Wet FGD 2009						Brown 3 FS HS-Wet FGD 2009						
Ghent 1 Exhaling FGD 1992						Ghent 1 Exhaling FGD 1992						
Ghent 2 FS HS-Wet FGD 2007						Ghent 2 FS HS-Wet FGD 2007						
Ghent 3 FS HS-Wet FGD 2009						Ghent 3 FS HS-Wet FGD 2009						
Ghent 4 FS HS-Wet FGD 2009						Ghent 4 FS HS-Wet FGD 2009						
SO ₂ Allowances Purchased: 674,933						SO ₂ Allowances Purchased: 677,793						2,515,638
Largest Annual SO ₂ Purchase (as a % of EPA Allocation): 81,109						Largest Annual SO ₂ Purchase (as a % of EPA Allocation): 115%						115%
NO _x Allowances Purchased: 81,109						NO _x Allowances Purchased: 152,403						605,043
NPV Total \$						NPV Total \$						NPV Total \$
Capital \$						Capital \$						Capital \$
Allowance Price (\$/Nominal/ton) NO _x						Allowance Price (\$/Nominal/ton) NO _x						Allowance Price (\$/Nominal/ton) NO _x
Production \$						Production \$						Production \$
Combined Company Allow. Purchases NO _x \$						Combined Company Allow. Purchases NO _x \$						Combined Company Allow. Purchases NO _x \$
SO ₂ \$						SO ₂ \$						SO ₂ \$
Year	362	3063	405	23,749	412	2599	412	2599	412	2599	412	2599
2005	3146	3063	405	23,749	412	2599	412	2599	412	2599	412	2599
2006	3146	3063	405	23,749	412	2599	412	2599	412	2599	412	2599
2007	3146	3063	405	23,749	412	2599	412	2599	412	2599	412	2599
2008	3146	3063	405	23,749	412	2599	412	2599	412	2599	412	2599
2009	3146	3063	405	23,749	412	2599	412	2599	412	2599	412	2599
2010	3146	3063	405	23,749	412	2599	412	2599	412	2599	412	2599
2011	3146	3063	405	23,749	412	2599	412	2599	412	2599	412	2599
2012	3146	3063	405	23,749	412	2599	412	2599	412	2599	412	2599
2013	3146	3063	405	23,749	412	2599	412	2599	412	2599	412	2599
2014	3146	3063	405	23,749	412	2599	412	2599	412	2599	412	2599
2015	3146	3063	405	23,749	412	2599	412	2599	412	2599	412	2599
2016	3146	3063	405	23,749	412	2599	412	2599	412	2599	412	2599
2017	3146	3063	405	23,749	412	2599	412	2599	412	2599	412	2599
2018	3146	3063	405	23,749	412	2599	412	2599	412	2599	412	2599
2019	3146	3063	405	23,749	412	2599	412	2599	412	2599	412	2599
2020	3146	3063	405	23,749	412	2599	412	2599	412	2599	412	2599
2021	3146	3063	405	23,749	412	2599	412	2599	412	2599	412	2599
2022	3146	3063	405	23,749	412	2599	412	2599	412	2599	412	2599
2023	3146	3063	405	23,749	412	2599	412	2599	412	2599	412	2599
2024	3146	3063	405	23,749	412	2599	412	2599	412	2599	412	2599
2025	3146	3063	405	23,749	412	2599	412	2599	412	2599	412	2599
2026	3146	3063	405	23,749	412	2599	412	2599	412	2599	412	2599
2027	3146	3063	405	23,749	412	2599	412	2599	412	2599	412	2599
2028	3146	3063	405	23,749	412	2599	412	2599	412	2599	412	2599
2029	3146	3063	405	23,749	412	2599	412	2599	412	2599	412	2599
2030	3146	3063	405	23,749	412	2599	412	2599	412	2599	412	2599
2031	3146	3063	405	23,749	412	2599	412	2599	412	2599	412	2599
2032	3146	3063	405	23,749	412	2599	412	2599	412	2599	412	2599
2033	3146	3063	405	23,749	412	2599	412	2599	412	2599	412	2599
2034	3146	3063	405	23,749	412	2599	412	2599	412	2599	412	2599
2035	3146	3063	405	23,749	412	2599	412	2599	412	2599	412	2599
Totals	13,689,616	74,637	163,269	905,255	14,832,778	13,671,906	147,085	164,055	813,000	14,796,046	36,732	

Confidential Information Redacted

Cost Comparison of Alternative NO_x Compliance Plans
All Costs in 2005 PVRR \$ x1000

Year	Case03: Base + Gh2 SCR 2008										Base Case										DIFFERENCE	
	Allowance Price (\$/nominal/ton) SO ₂	Production \$	Allow. Purchases NOx \$	Capital \$	NPV Total \$	Allowance Price (\$/nominal/ton) SO ₂	Production \$	Allow. Purchases NOx \$	Capital \$	NPV Total \$	Allowance Price (\$/nominal/ton) SO ₂	Production \$	Allow. Purchases NOx \$	Capital \$	NPV Total \$	Total \$	Cumulative Total \$					
2005	3146	392	-	11,233	530,011	3146	392	-	11,233	530,011	3146	392	-	11,233	605,043	-	-					
2006	3063	405	-	23,749	58,128	3063	405	-	23,749	58,128	3063	405	-	23,749	8,748	8,748						
2007	2599	412	-	77,299	2352	2599	412	-	77,299	2352	2599	412	-	77,299	12,136	20,884						
2008	2343	419	4,570	88,460	2308	2343	419	4,570	88,460	2308	2343	419	4,570	10,828	31,712							
2009	2299	407	-	83,436	1874	2299	407	-	83,436	1874	2299	407	-	74,429	9,713	41,425						
2010	1874	536	-	74,442	6,925	1874	536	-	74,442	6,925	1874	536	-	66,404	6,264	47,689						
2011	1666	547	3,508	6,777	1731	1666	547	3,508	6,777	1731	1666	547	3,508	5,151	52,840							
2012	1752	558	6,925	52,664	2344	1752	558	6,925	52,664	2344	1752	558	6,925	3,491	56,332							
2013	1731	569	6,777	46,874	2400	1731	569	6,777	46,874	2400	1731	569	6,777	11,867	68,199							
2014	2344	580	13,904	41,630	2566	2344	580	13,904	41,630	2566	2344	580	13,904	12,482	80,681							
2015	2596	604	7,709	32,592	2656	2596	604	7,709	32,592	2656	2596	604	7,709	12,838	93,519							
2016	2656	616	7,350	28,711	2674	2656	616	7,350	28,711	2674	2656	616	7,350	13,023	106,542							
2017	2668	628	7,418	25,206	2807	2668	628	7,418	25,206	2807	2668	628	7,418	13,012	119,554							
2018	2674	641	7,297	22,044	2833	2674	641	7,297	22,044	2833	2674	641	7,297	12,468	132,022							
2019	2713	653	7,984	19,195	2861	2713	653	7,984	19,195	2861	2713	653	7,984	12,224	144,246							
2020	2807	666	7,604	16,630	2918	2807	666	7,604	16,630	2918	2807	666	7,604	11,641	155,887							
2021	2833	680	7,446	14,325	2971	2833	680	7,446	14,325	2971	2833	680	7,446	10,922	166,809							
2022	2861	693	7,582	10,094	3,961	2861	693	7,582	10,094	3,961	2861	693	7,582	6,200	173,009							
2023	2918	707	7,467	6,990	706	2918	707	7,467	6,990	706	2918	707	7,467	3,961	176,970							
2024	2971	721	-	-	-	2971	721	-	-	-	2971	721	-	-	1,085	178,055						
2025	-	-	-	-	-	-	-	-	-	-	-	-	-	-	790	179,845						
2026	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	41,563						
2027	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	41,563						
2028	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	41,563						
2029	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	41,563						
2030	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	41,563						
2031	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	41,563						
2032	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	41,563						
2033	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	41,563						
2034	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	41,563						
2035	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	41,563						
Totals			70,149	183,204	913,044	14,837,829	13,671,906	147,085	164,055	813,000	14,796,046	41,563										

APPENDIX E

Base Case

NO_x SUMMARY BY YEAR

Unit NO _x EMISS RATE (ppmv)	Ownership	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	
Brown 1	KU	0.322	0.320	0.321	0.320	0.320	0.320	0.320	0.320	0.320	0.320	0.320	0.320	0.320	0.320	0.320	0.320	0.320	0.320	0.320	0.320	0.320	0.320
Brown 2	KU	0.321	0.320	0.321	0.320	0.320	0.320	0.320	0.320	0.320	0.320	0.320	0.320	0.320	0.320	0.320	0.320	0.320	0.320	0.320	0.320	0.320	0.320
Brown 3	KU	0.270	0.270	0.270	0.270	0.270	0.270	0.270	0.270	0.270	0.270	0.270	0.270	0.270	0.270	0.270	0.270	0.270	0.270	0.270	0.270	0.270	0.270
Ghent 1	KU	0.055	0.054	0.054	0.055	0.056	0.058	0.060	0.064	0.068	0.065	0.066	0.063	0.060	0.058	0.059	0.058	0.057	0.058	0.055	0.058	0.058	0.058
Ghent 2	KU	0.301	0.300	0.300	0.300	0.300	0.300	0.300	0.300	0.300	0.300	0.300	0.300	0.300	0.300	0.300	0.300	0.300	0.300	0.300	0.300	0.300	0.300
Ghent 3	KU	0.039	0.038	0.039	0.038	0.038	0.039	0.038	0.038	0.038	0.039	0.038	0.038	0.038	0.038	0.038	0.038	0.038	0.039	0.039	0.039	0.038	0.038
Ghent 4	KU	0.340	0.039	0.041	0.042	0.040	0.040	0.040	0.039	0.039	0.039	0.039	0.039	0.039	0.039	0.039	0.039	0.039	0.039	0.040	0.039	0.039	0.038
Green River 3	KU	0.392	0.393	0.392	0.392	0.391	0.392	0.393	0.393	0.392	0.392	0.392	0.392	0.391	0.392	0.391	0.391	0.391	0.391	0.391	0.391	0.391	0.391
Green River 4	KU	0.382	0.381	0.381	0.381	0.381	0.381	0.382	0.381	0.381	0.381	0.381	0.381	0.381	0.381	0.381	0.381	0.381	0.381	0.381	0.381	0.381	0.381
Tyrone 3	KU	0.381	0.381	0.383	0.384	0.386	0.382	0.383	0.383	0.388	0.386	0.387	0.389	0.392	0.388	0.391	0.391	0.391	0.391	0.391	0.391	0.395	0.395
Cane Run 4	LGE	0.325	0.326	0.326	0.327	0.327	0.328	0.328	0.328	0.328	0.328	0.328	0.328	0.328	0.328	0.328	0.328	0.328	0.328	0.328	0.328	0.328	0.328
Cane Run 5	LGE	0.373	0.375	0.379	0.379	0.376	0.374	0.373	0.374	0.377	0.378	0.378	0.380	0.381	0.382	0.383	0.383	0.385	0.385	0.385	0.387	0.387	0.388
Cane Run 6	LGE	0.308	0.308	0.309	0.306	0.305	0.303	0.302	0.303	0.303	0.304	0.305	0.306	0.307	0.307	0.308	0.308	0.309	0.309	0.309	0.309	0.310	0.310
Mill Creek 1	LGE	0.266	0.266	0.267	0.267	0.267	0.265	0.264	0.265	0.265	0.266	0.266	0.267	0.267	0.267	0.267	0.267	0.268	0.268	0.268	0.268	0.268	0.268
Mill Creek 2	LGE	0.252	0.252	0.252	0.252	0.252	0.252	0.252	0.252	0.252	0.252	0.252	0.252	0.252	0.252	0.252	0.252	0.252	0.252	0.252	0.252	0.252	
Mill Creek 3	LGE	0.057	0.059	0.060	0.059	0.058	0.060	0.058	0.058	0.057	0.057	0.058	0.058	0.058	0.059	0.058	0.058	0.058	0.058	0.058	0.058	0.058	0.058
Mill Creek 4	LGE	0.038	0.038	0.040	0.040	0.039	0.041	0.040	0.040	0.041	0.040	0.040	0.040	0.040	0.039	0.039	0.039	0.041	0.039	0.040	0.039	0.040	0.040
Tremble County 1	KU	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Tremble County 2	LGE	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Peakers	KU	0.076	0.074	0.073	0.075	0.074	0.075	0.075	0.076	0.076	0.077	0.077	0.077	0.077	0.077	0.077	0.077	0.077	0.077	0.077	0.077	0.077	0.077
Peakers	LGE	0.072	0.070	0.070	0.071	0.071	0.072	0.072	0.072	0.075	0.073	0.070	0.069	0.068	0.068	0.067	0.066	0.066	0.064	0.064	0.064	0.064	0.063
SCRUBBER REMOVAL EFF.																							
Brown 1		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Brown 2		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Brown 3		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Ghent 1		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Ghent 2		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Ghent 3		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Ghent 4		0%	0%	0%	0%	0%	0%	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%	0%	0%	0%	0%	0%	0%	
Green River 4		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Tyrone 3		0%	0%	0%	0%	0%	0%	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%	0%	0%	0%	0%	0%	0%	
Cane Run 5		0%	0%	0%	0%	0%	0%	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%	0%	0%	0%	0%	0%	0%	
Mill Creek 1		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Mill Creek 2		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Mill Creek 3		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Mill Creek 4		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Tremble County 1		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Tremble County 2		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Peakers		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Peakers		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
TONS NO_x EMITTED																							
Brown 1	KU	659	606	689	595	745	1,647	1,542	1,609	1,405	1,855	1,728	1,722	1,772	1,787	1,847	1,850	1,903	1,924	1,948	1,961	1,974	
Brown 2	KU	669	767	684	787	844	1,868	1,820	1,852	1,868	1,870	1,886	1,925	1,947	1,966	1,973	1,979	1,798	2,010	2,031	2,031	2,031	
Brown 3	KU	1,147	1,274	1,590	1,519	1,704	3,777	3,569	3,242	3,724	3,796	3,827	3,912	4,027	3,992	3,868	4,104	4,247	4,304	4,326	4,384	4,426	
Ghent 1	KU	452	446	423	447	452	1,037	1,122	1,092	1,140	996	1,123	1,080	1,052	1,023	1,012	1,019	915	1,028	961	1,028	1,044	
Ghent 2	KU	1,784	1,853	1,768	2,316	1,936	4,912	4,865	4,394	4,949	4,808	4,963	5,006	5,044	5,008	4,860	5,142	5,227	5,278	5,299	5,245	5,302	
Ghent 3	KU	322	319	353	343	343	692	747	756	757	767	772	774	693	773	775	776	780	785	783	793	784	
Ghent 4	KU	328	325	333	338	355	755	773	778	778	787	791	714	793	795	797	796	800	801	723	805	804	
Green River 3	KU	284	301	364	342	321	782	866	724	770	793	832	770	901	906	949	945	996	1,011	889	1,024	1,058	
Green River 4	KU	489	455	515	488	489	1,022	1,028	1,091	1,125	1,168	1,207	1,203	1,122	1,278	1,357	1,326	1,378	1,405	1,402	1,273	1,433	
Tyrone 3	KU	278	300	378	358	340	676	691	758	801	821	854	874	856	906	1,000	971	1,042	1,048	1,073	965	1,089	
Cane Run 4	LGE	766	784	801	760	718	1,374	1,102	1,339	1,312	1,462	1,465	1,507	1,584	1,414	1,718	1,683	1,743	1,783	1,798	1,820	1,839	
Cane Run 5	LGE	880	823	959	848	735	1,633	1,475	1,581	1,644	1,732	1,626	1,699	1,979	2,004	2,084							

Case01- Base + Br3 SCR 2010

Unit NO _x EMISSION RATE #lb/10 ³ gal	Ownership	NO _x SUMMARY BY YEAR																				
		2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025
Brown 1	KU	0.502	0.502	0.501	0.502	0.502	0.501	0.501	0.501	0.502	0.501	0.501	0.501	0.501	0.501	0.501	0.501	0.501	0.501	0.501	0.501	0.501
Brown 2	KU	0.321	0.320	0.321	0.320	0.320	0.320	0.320	0.320	0.320	0.320	0.320	0.320	0.320	0.320	0.320	0.320	0.320	0.320	0.320	0.320	0.320
Brown 3	KU	0.270	0.270	0.270	0.270	0.270	0.270	0.270	0.270	0.270	0.270	0.270	0.270	0.270	0.270	0.270	0.270	0.270	0.270	0.270	0.270	0.270
Ghent 1	KU	0.055	0.054	0.054	0.056	0.056	0.062	0.071	0.066	0.069	0.065	0.069	0.068	0.061	0.058	0.059	0.058	0.057	0.057	0.056	0.058	0.058
Ghent 2	KU	0.301	0.300	0.300	0.300	0.300	0.300	0.300	0.300	0.300	0.300	0.300	0.300	0.300	0.300	0.300	0.300	0.300	0.300	0.300	0.300	0.300
Ghent 3	KU	0.039	0.038	0.039	0.038	0.038	0.038	0.038	0.038	0.039	0.039	0.039	0.038	0.038	0.038	0.038	0.038	0.038	0.038	0.038	0.038	0.038
Ghent 4	KU	0.040	0.039	0.041	0.042	0.040	0.039	0.039	0.039	0.039	0.039	0.039	0.039	0.039	0.039	0.039	0.039	0.039	0.039	0.039	0.039	0.039
Green River 3	KU	0.392	0.393	0.392	0.392	0.391	0.392	0.393	0.393	0.392	0.392	0.392	0.392	0.392	0.391	0.391	0.391	0.391	0.391	0.391	0.391	0.391
Green River 4	KU	0.382	0.381	0.381	0.381	0.381	0.381	0.381	0.381	0.381	0.381	0.381	0.381	0.381	0.381	0.381	0.381	0.381	0.381	0.381	0.381	0.381
Tyrone 3	KU	0.381	0.381	0.383	0.384	0.388	0.382	0.383	0.383	0.388	0.386	0.388	0.389	0.392	0.388	0.391	0.391	0.391	0.391	0.391	0.395	0.395
Cane Run 4	KU	0.325	0.326	0.326	0.327	0.327	0.328	0.329	0.328	0.328	0.328	0.328	0.328	0.328	0.328	0.328	0.328	0.328	0.328	0.328	0.328	0.328
Cane Run 5	LGE	0.373	0.375	0.379	0.379	0.379	0.374	0.373	0.374	0.377	0.378	0.378	0.380	0.381	0.382	0.383	0.385	0.385	0.385	0.385	0.387	0.387
Cane Run 6	LGE	0.308	0.308	0.309	0.306	0.305	0.302	0.301	0.302	0.302	0.304	0.304	0.306	0.306	0.306	0.307	0.307	0.308	0.308	0.309	0.309	0.310
Mill Creek 1	LGE	0.266	0.266	0.267	0.267	0.267	0.265	0.264	0.265	0.265	0.265	0.266	0.266	0.267	0.267	0.267	0.267	0.267	0.268	0.268	0.268	0.268
Mill Creek 2	LGE	0.252	0.252	0.252	0.252	0.252	0.252	0.252	0.252	0.252	0.252	0.252	0.252	0.252	0.252	0.252	0.252	0.252	0.252	0.252	0.252	0.252
Mill Creek 3	LGE	0.057	0.059	0.060	0.059	0.058	0.060	0.059	0.058	0.057	0.056	0.058	0.058	0.059	0.058	0.058	0.058	0.058	0.058	0.058	0.058	0.058
Mill Creek 4	LGE	0.039	0.039	0.040	0.040	0.039	0.041	0.040	0.041	0.041	0.040	0.040	0.040	0.040	0.039	0.039	0.039	0.039	0.039	0.040	0.039	0.040
Tribble County 1	LGE	0.049	0.047	0.047	0.047	0.048	0.048	0.047	0.047	0.047	0.048	0.048	0.047	0.047	0.047	0.047	0.047	0.047	0.047	0.047	0.047	0.047
Tribble County 2	KU	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Tribble County 2	LGE	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Peakers	KU	0.076	0.074	0.073	0.075	0.074	0.075	0.075	0.076	0.076	0.072	0.070	0.069	0.068	0.068	0.067	0.066	0.065	0.065	0.064	0.064	0.063
Peakers	LGE	0.072	0.070	0.070	0.071	0.071	0.072	0.072	0.074	0.073	0.072	0.069	0.068	0.067	0.067	0.066	0.065	0.064	0.064	0.064	0.064	0.063
SCRUBBER REMOVAL EFF.																						
Brown 1		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Brown 2		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Brown 3		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Ghent 1		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Ghent 2		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Ghent 3		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Ghent 4		0%	0%	0%	0%	0%	0%	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%	0%	0%	0%	0%	0%	0%
Green River 4		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Tyrone 3		0%	0%	0%	0%	0%	0%	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%	0%	0%	0%	0%	0%	0%
Cane Run 5		0%	0%	0%	0%	0%	0%	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%	0%	0%	0%	0%	0%	0%
Mill Creek 1		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Mill Creek 2		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Mill Creek 3		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Mill Creek 4		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Tribble County 1		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Tribble County 2		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Tribble County 2		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Peakers		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Peakers		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
TONS NO_x EMITTED																						
Brown 1	KU	659	606	689	595	745	1,649	1,548	1,613	1,409	1,656	1,732	1,730	1,774	1,768	1,649	1,657	1,603	1,626	1,950	1,962	1,976
Brown 2	KU	669	767	684	787	844	1,934	1,794	1,828	1,845	1,637	1,664	1,663	1,639	1,924	1,949	1,952	1,960	1,780	1,996	2,018	2,021
Brown 3	KU	1,147	1,274	1,580	1,519	1,704	489	476	429	469	501	503	513	521	519	469	525	533	537	549	549	549
Ghent 1	KU	452	446	423	447	452	1,059	1,170	1,107	1,135	988	1,163	1,141	1,055	1,017	1,024	1,008	916	1,018	990	1,020	1,026
Ghent 2	KU	1,784	1,853	1,768	2,316	1,936	4,836	4,814	4,332	4,874	4,801	4,874	4,892	4,952	4,895	4,832	5,045	5,151	5,198	5,239	5,191	5,247
Ghent 3	KU	322	319	353	343	343	666	743	752	762	762	768	768	769	770	771	777	782	779	697	697	780
Ghent 4	KU	328	325	333	338	355	781	770	778	773	784	787	711	790	791	794	792	797	800	721	800	801
Green River 3	KU	284	301	364	342	321	764	670	723	775	793	830	772	904	907	960	945	997	1,013	889	1,024	1,059
Green River 4	KU	469	455	515	496	489	1,000	1,036	1,054	1,127	1,170	1,211	1,208	1,124	1,279	1,358	1,327	1,376	1,407	1,402	1,274	1,434
Tyrone 3	KU	276	300	378	358	340	679	694	760	802	827	855	880	858	907	1,002	971	1,042	1,048	1,074	966	1,081
Cane Run 4	LGE	766	784	801	760	718	1,380	1,096	1,344	1,318	1,466	1,466	1,511	1,594	1,411	1,716	1,678	1,740	1,760	1,793	1,817	1,636
Cane Run 5	LGE	880	823	959	848	735	1,638	1,478	1,500	1,647	1,732	1,627	1,874	1,978	2,004	2,003	2,122	2,202	1,971	2,279	2,291	2,340
Cane Run 6	LGE	1,089	1,122	1,019	971	965	2,155	1,927	2,035	2,084	2,101	2,231	2,049	2,343	2,285	2,421	2,400	2,502	2,536	2,624	2,610	2,624
Mill Creek 1	LGE	1,112	1,092	1,111	1,056	1,080	2,396	2,472	2,199	2,569	2,413	2,642	2,534	2,596	2,546	2,757	2,882	2,805	2,648	2,829	2,897	2,877
Mill Creek 2	LGE	1,027	1,146	948	1,128	1,098	2,520	2,082	2,506	2,384	2,575	2,429	2,805	2,495	2,629	2,314	2,683	2,545	2,735	2,576	2,757	2,813
Mill Creek 3	LGE	373	389	389	387	377	886	812	851	725	844	819	873	846	885	837	914	780	875	846	896	864
Mill Creek 4	LGE	301	308	316	309	308	667	680	666	704	603	717	676	725	672	719	676	719	674	619	740	688
Tribble County 1	LGE	304	296	298	296	300	722	662	713	655	714	667	718	654								

Case02- Base + Gh2 SCR 2010

Unit NO _x EMISS RATE (mmt/yr)	Ownership	NO _x SUMMARY BY YEAR																			
		2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025
Brown 1	KU	0.502	0.502	0.501	0.502	0.501	0.501	0.501	0.502	0.501	0.501	0.501	0.501	0.501	0.501	0.501	0.501	0.501	0.501	0.501	0.501
Brown 2	KU	0.321	0.320	0.321	0.320	0.320	0.320	0.320	0.320	0.320	0.320	0.320	0.320	0.320	0.320	0.320	0.320	0.320	0.320	0.320	0.320
Brown 3	KU	0.270	0.270	0.270	0.270	0.270	0.270	0.270	0.270	0.270	0.270	0.270	0.270	0.270	0.270	0.270	0.270	0.270	0.270	0.270	0.270
Ghent 1	KU	0.055	0.054	0.054	0.056	0.056	0.060	0.067	0.063	0.068	0.065	0.065	0.062	0.061	0.058	0.058	0.057	0.057	0.055	0.058	0.058
Ghent 2	KU	0.301	0.300	0.300	0.300	0.300	0.307	0.037	0.037	0.037	0.037	0.037	0.037	0.037	0.037	0.037	0.037	0.037	0.037	0.037	0.037
Ghent 3	KU	0.039	0.038	0.039	0.038	0.038	0.039	0.038	0.038	0.038	0.039	0.039	0.038	0.038	0.038	0.038	0.038	0.038	0.038	0.038	0.038
Ghent 4	KU	0.040	0.039	0.041	0.042	0.040	0.040	0.039	0.039	0.039	0.039	0.039	0.039	0.039	0.039	0.039	0.039	0.039	0.039	0.039	0.039
Green River 3	KU	0.392	0.393	0.392	0.392	0.391	0.392	0.393	0.393	0.392	0.392	0.392	0.392	0.391	0.391	0.391	0.391	0.391	0.391	0.391	0.391
Green River 4	KU	0.382	0.381	0.381	0.381	0.381	0.381	0.382	0.381	0.381	0.381	0.381	0.381	0.381	0.381	0.381	0.381	0.381	0.381	0.381	0.381
Tyrene 3	KU	0.381	0.381	0.383	0.384	0.388	0.382	0.383	0.383	0.388	0.388	0.388	0.388	0.389	0.389	0.391	0.391	0.391	0.391	0.395	0.395
Cane Run 4	LGE	0.325	0.326	0.326	0.327	0.327	0.328	0.328	0.328	0.328	0.328	0.328	0.328	0.328	0.328	0.328	0.328	0.328	0.328	0.328	0.328
Cane Run 5	LGE	0.373	0.376	0.379	0.379	0.379	0.374	0.373	0.374	0.377	0.378	0.378	0.380	0.381	0.382	0.383	0.385	0.385	0.385	0.387	0.387
Cane Run 6	LGE	0.308	0.308	0.309	0.306	0.309	0.303	0.303	0.303	0.304	0.304	0.306	0.305	0.306	0.307	0.307	0.308	0.308	0.309	0.309	0.310
Mill Creek 1	LGE	0.256	0.266	0.267	0.267	0.267	0.265	0.264	0.265	0.265	0.265	0.266	0.266	0.267	0.267	0.267	0.268	0.268	0.268	0.268	0.268
Mill Creek 2	LGE	0.252	0.252	0.252	0.252	0.252	0.252	0.252	0.252	0.252	0.252	0.252	0.252	0.252	0.252	0.252	0.252	0.252	0.252	0.252	0.252
Mill Creek 3	LGE	0.057	0.059	0.060	0.059	0.058	0.060	0.058	0.058	0.057	0.057	0.058	0.058	0.058	0.058	0.058	0.058	0.058	0.058	0.058	0.058
Mill Creek 4	LGE	0.039	0.039	0.040	0.040	0.039	0.041	0.040	0.040	0.041	0.040	0.040	0.040	0.040	0.040	0.039	0.039	0.041	0.039	0.040	0.039
Trimble County 1	LGE	0.049	0.047	0.047	0.047	0.047	0.048	0.048	0.048	0.048	0.047	0.048	0.047	0.048	0.047	0.047	0.047	0.047	0.047	0.047	0.047
Trimble County 2	LGE	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Peakers	KU	0.076	0.074	0.073	0.073	0.074	0.075	0.075	0.075	0.075	0.075	0.075	0.075	0.075	0.075	0.075	0.075	0.075	0.075	0.075	0.075
Peakers	LGE	0.072	0.070	0.070	0.071	0.071	0.072	0.072	0.072	0.072	0.072	0.072	0.072	0.069	0.068	0.068	0.067	0.066	0.065	0.064	0.063
SCRUBBER REMOVAL EFF.																					
Brown 1		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Brown 2		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Brown 3		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Ghent 1		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Ghent 2		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Ghent 3		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Ghent 4		0%	0%	0%	0%	0%	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%	0%	0%	0%	0%	0%
Green River 4		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Tyrene 3		0%	0%	0%	0%	0%	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%	0%	0%	0%	0%	0%
Cane Run 5		0%	0%	0%	0%	0%	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%	0%	0%	0%	0%	0%
Mill Creek 1		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Mill Creek 2		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Mill Creek 3		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Mill Creek 4		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Trimble County 1		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Trimble County 2		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Peakers		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Peakers		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
TONS NO_x EMITTED																					
Brown 1	KU	659	606	689	598	745	1,648	1,544	1,609	1,406	1,656	1,728	1,723	1,773	1,786	1,848	1,656	1,903	1,925	1,949	1,962
Brown 2	KU	569	567	584	787	844	1,843	1,802	1,831	1,848	1,843	1,665	1,872	1,902	1,921	1,950	1,951	1,961	1,783	1,995	2,018
Brown 3	KU	1,147	1,274	1,590	1,519	1,704	3,668	3,558	3,231	3,714	3,786	3,820	3,900	4,013	3,980	3,858	4,091	4,236	4,294	4,316	4,363
Ghent 1	KU	452	446	423	447	452	1,028	1,119	1,075	1,131	960	1,109	1,065	1,053	1,014	1,032	1,010	908	1,017	985	1,021
Ghent 2	KU	1,784	1,853	1,768	2,316	1,536	669	659	592	659	661	659	653	652	662	596	664	666	668	657	657
Ghent 3	KU	322	319	353	343	343	684	737	748	748	756	761	762	684	763	768	772	778	777	778	778
Ghent 4	KU	328	326	333	338	355	776	765	774	771	779	782	706	786	786	791	789	795	798	779	800
Green River 3	KU	284	301	364	342	321	782	867	722	770	793	832	770	904	907	950	945	997	1,013	889	1,025
Green River 4	KU	469	455	515	496	489	1,022	1,039	1,091	1,126	1,169	1,208	1,204	1,124	1,279	1,388	1,327	1,376	1,406	1,402	1,434
Tyrene 3	KU	275	300	378	358	340	676	683	758	800	827	854	875	857	907	1,001	971	1,042	1,049	1,074	1,089
Cane Run 4	LGE	766	784	801	760	718	1,381	1,104	1,344	1,317	1,463	1,471	1,508	1,589	1,414	1,719	1,583	1,744	1,763	1,797	1,820
Cane Run 5	LGE	880	823	959	848	735	1,636	1,478	1,687	1,650	1,735	1,627	1,873	1,981	2,005	2,086	2,123	2,203	1,972	2,280	2,342
Cane Run 6	LGE	1,089	1,122	1,019	971	965	2,188	1,949	2,057	2,105	2,118	2,236	2,067	2,374	2,313	2,447	2,426	2,520	2,555	2,292	2,620
Mill Creek 1	LGE	1,112	1,052	1,111	1,055	1,080	2,411	2,481	2,205	2,575	2,419	2,644	2,905	2,697	2,947	2,759	2,385	2,604	2,646	2,629	2,694
Mill Creek 2	LGE	1,027	1,146	948	1,128	1,098	2,544	2,120	2,517	2,387	2,584	2,447	2,613	2,504	2,646	2,318	2,690	2,548	2,738	2,579	2,767
Mill Creek 3	LGE	373	389	389	387	377	890	814	851	726	846	821	875	847	887	839	915	781	875	846	898
Mill Creek 4	LGE	301	308	316	309	308	669	681	657	705	603	717	675	724	671	718	675	747	619	740	687
Trimble County 1	LGE	304	296	296	296	300	729	682	722	658	717	665	717	609	714	655	711	661	717	657	722
Trimble County 2	KU	0	0	0	0	0	565	1,000	1,009	1,003	1,009	1,012	1,015	1,013	1,015	1,017	1,020	1,019	1,020	1,020	1,020
Trimble County 2	LGE	0	0	0	0	0	206	351	355	352	355	356	356	356	357	357	359	358	358	358	358
Peakers	KU	114	135	174	199	267	273	250	298	385	428	477	508	575	580	577	747	847	945	1,050	1,156
Peakers	LGE	50	63	82	95	126	126	117	142	176	199	233	249	284	290	370	382	431	488	550	600
NO_x EMISSIONS (TONS)																					
Total		12,405	12,763	13,196	13,668	13,501															

Case03- Base + Gh2 SCR 2008

NO_x SUMMARY BY YEAR

Unit NO _x EMISS RATE (ppmTU)	Ownership	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025		
Brown 1	KU	0.502	0.502	0.501	0.502	0.502	0.501	0.501	0.501	0.502	0.501	0.501	0.501	0.501	0.501	0.501	0.501	0.501	0.501	0.501	0.501	0.501	0.501	
Brown 2	KU	0.321	0.320	0.321	0.320	0.320	0.320	0.320	0.320	0.320	0.320	0.320	0.320	0.320	0.320	0.320	0.320	0.320	0.320	0.320	0.320	0.320	0.320	
Brown 3	KU	0.270	0.270	0.270	0.270	0.270	0.270	0.270	0.270	0.270	0.270	0.270	0.270	0.270	0.270	0.270	0.270	0.270	0.270	0.270	0.270	0.270	0.270	
Ghent 1	KU	0.055	0.054	0.054	0.056	0.056	0.060	0.067	0.063	0.068	0.065	0.065	0.065	0.062	0.061	0.058	0.059	0.058	0.057	0.057	0.055	0.058	0.058	
Ghent 2	KU	0.301	0.300	0.300	0.039	0.037	0.037	0.037	0.037	0.037	0.037	0.037	0.037	0.037	0.037	0.037	0.037	0.037	0.037	0.037	0.037	0.037	0.037	
Ghent 3	KU	0.039	0.038	0.039	0.038	0.038	0.039	0.038	0.038	0.038	0.039	0.039	0.039	0.039	0.039	0.039	0.039	0.039	0.039	0.039	0.039	0.039	0.039	
Ghent 4	KU	0.040	0.039	0.041	0.042	0.040	0.040	0.039	0.039	0.039	0.039	0.039	0.039	0.039	0.039	0.039	0.039	0.039	0.039	0.039	0.039	0.039	0.039	
Green River 3	KU	0.392	0.393	0.392	0.392	0.391	0.392	0.393	0.393	0.392	0.392	0.392	0.392	0.392	0.391	0.391	0.391	0.391	0.391	0.391	0.391	0.391	0.391	
Green River 4	KU	0.382	0.381	0.381	0.381	0.381	0.381	0.382	0.381	0.381	0.381	0.381	0.381	0.381	0.381	0.381	0.381	0.381	0.381	0.381	0.381	0.381	0.381	
Tyrone 3	KU	0.381	0.381	0.383	0.384	0.388	0.382	0.383	0.383	0.388	0.386	0.388	0.388	0.389	0.392	0.388	0.391	0.391	0.391	0.391	0.391	0.395	0.395	
Cane Run 4	LGE	0.325	0.326	0.326	0.327	0.327	0.328	0.328	0.328	0.328	0.328	0.328	0.328	0.328	0.328	0.328	0.328	0.328	0.328	0.328	0.328	0.328	0.328	
Cane Run 5	LGE	0.373	0.375	0.379	0.379	0.379	0.374	0.373	0.374	0.377	0.378	0.378	0.380	0.381	0.382	0.383	0.385	0.385	0.385	0.385	0.387	0.387	0.388	
Cane Run 6	LGE	0.308	0.308	0.309	0.306	0.305	0.303	0.301	0.303	0.303	0.304	0.305	0.305	0.306	0.307	0.307	0.308	0.308	0.309	0.309	0.309	0.309	0.310	
Mill Creek 1	LGE	0.266	0.266	0.267	0.267	0.267	0.265	0.264	0.265	0.265	0.265	0.265	0.265	0.265	0.267	0.267	0.267	0.267	0.268	0.268	0.268	0.268	0.268	
Mill Creek 2	LGE	0.252	0.252	0.252	0.252	0.252	0.252	0.252	0.252	0.252	0.252	0.252	0.252	0.252	0.252	0.252	0.252	0.252	0.252	0.252	0.252	0.252	0.252	
Mill Creek 3	LGE	0.057	0.059	0.060	0.059	0.058	0.060	0.059	0.058	0.057	0.057	0.058	0.058	0.058	0.058	0.058	0.058	0.058	0.058	0.058	0.058	0.058	0.058	
Mill Creek 4	LGE	0.039	0.039	0.040	0.040	0.039	0.041	0.040	0.040	0.041	0.040	0.040	0.040	0.040	0.040	0.040	0.040	0.040	0.040	0.040	0.040	0.040	0.040	
Trimble County 1	LGE	0.049	0.047	0.047	0.047	0.048	0.048	0.048	0.048	0.048	0.047	0.048	0.047	0.048	0.048	0.047	0.047	0.047	0.047	0.047	0.047	0.047	0.047	
Trimble County 2	KU	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	
Trimble County 2	LGE	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	
Peakers	KU	0.078	0.074	0.073	0.075	0.074	0.075	0.075	0.075	0.076	0.076	0.076	0.076	0.076	0.069	0.068	0.068	0.068	0.067	0.066	0.065	0.064	0.064	0.063
Peakers	LGE	0.072	0.070	0.070	0.071	0.071	0.072	0.072	0.072	0.072	0.072	0.072	0.072	0.069	0.068	0.067	0.066	0.066	0.066	0.066	0.064	0.064	0.064	0.063
SCRUBBER REMOVAL EFF.																								
Brown 1		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%		
Brown 2		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%		
Brown 3		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%		
Ghent 1		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%		
Ghent 2		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%		
Ghent 3		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%		
Ghent 4		0%	0%	0%	0%	0%	0%	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%	0%	0%	0%	0%	0%	0%		
Green River 4		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%		
Tyrone 3		0%	0%	0%	0%	0%	0%	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%	0%	0%	0%	0%	0%	0%		
Cane Run 5		0%	0%	0%	0%	0%	0%	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%	0%	0%	0%	0%	0%	0%		
Mill Creek 1		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%		
Mill Creek 2		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%		
Mill Creek 3		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%		
Mill Creek 4		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%		
Trimble County 1		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%		
Trimble County 2		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%		
Trimble County 2		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%		
Peakers		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%		
Peakers		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%		
TONS NO_x EMITTED																								
Brown 1	KU	659	666	689	595	709	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025		
Brown 2	KU	669	767	684	787	837	1,843	1,802	1,831	1,848	1,843	1,665	1,728	1,723	1,773	1,848	1,656	1,903	1,925	1,949	1,962	1,974		
Brown 3	KU	1,147	1,274	1,590	1,520	1,705	3,668	3,558	3,231	3,714	3,786	3,820	3,800	4,013	3,980	3,858	4,091	4,236	4,294	4,316	4,363	4,402		
Ghent 1	KU	452	446	423	445	449	1,028	1,119	1,075	1,131	900	1,109	1,065	1,053	1,014	1,022	1,010	908	1,017	985	1,021	1,035		
Ghent 2	KU	1,784	1,853	1,758	317	255	669	659	592	659	661	659	663	652	662	662	596	664	666	668	667	667	668	
Ghent 3	KU	322	319	353	338	340	684	737	747	748	755	761	762	684	763	767	768	772	778	777	777	777		
Ghent 4	KU	328	325	333	340	351	776	765	774	771	779	782	706	786	786	791	789	795	798	797	797	800		
Green River 3	KU	284	301	364	342	321	762	867	722	770	793	832	770	904	907	960	945	997	1,013	889	1,025	1,058		
Green River 4	KU	469	455	515	496	492	1,002	1,039	1,091	1,126	1,169	1,208	1,204	1,124	1,279	1,358	1,327	1,376	1,406	1,402	1,274	1,434		
Tyrone 3	KU	276	300	378	358	338	676	693	788	800	827	854	875	857	907	1,001	971	1,042	1,049	1,074	966</			

Case04- Base + Br3 & Gh2 SCR 2010

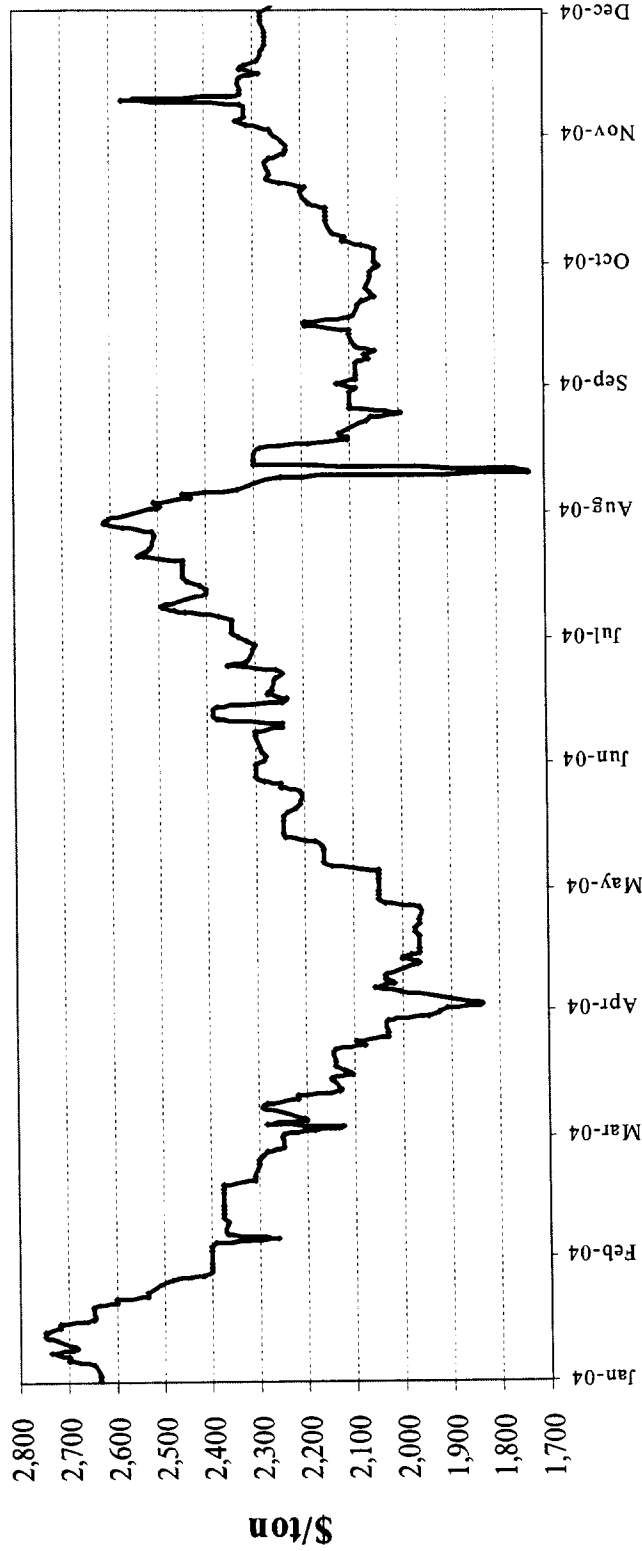
		NO _x SUMMARY BY YEAR																				
Unit NO _x EMISS RATE (ppmBtu)	Ownership	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025
Brown 1	KU	0.502	0.502	0.501	0.502	0.502	0.501	0.501	0.501	0.502	0.501	0.501	0.501	0.501	0.501	0.501	0.501	0.501	0.501	0.501	0.501	0.501
Brown 2	KU	0.321	0.320	0.321	0.320	0.320	0.320	0.320	0.320	0.320	0.320	0.320	0.320	0.320	0.320	0.320	0.320	0.320	0.320	0.320	0.320	0.320
Brown 3	KU	0.270	0.270	0.270	0.270	0.270	0.270	0.270	0.270	0.270	0.270	0.270	0.270	0.270	0.270	0.270	0.270	0.270	0.270	0.270	0.270	0.270
Ghent 1	KU	0.055	0.054	0.054	0.056	0.056	0.056	0.056	0.056	0.056	0.056	0.056	0.056	0.056	0.056	0.056	0.056	0.056	0.056	0.056	0.056	0.056
Ghent 2	KU	0.301	0.300	0.300	0.300	0.300	0.300	0.300	0.300	0.300	0.300	0.300	0.300	0.300	0.300	0.300	0.300	0.300	0.300	0.300	0.300	0.300
Ghent 3	KU	0.039	0.038	0.038	0.038	0.038	0.038	0.038	0.038	0.038	0.038	0.038	0.038	0.038	0.038	0.038	0.038	0.038	0.038	0.038	0.038	0.038
Ghent 4	KU	0.040	0.039	0.041	0.042	0.040	0.039	0.039	0.039	0.039	0.039	0.039	0.039	0.039	0.039	0.039	0.039	0.039	0.039	0.039	0.039	0.039
Green River 3	KU	0.392	0.393	0.392	0.392	0.391	0.392	0.393	0.393	0.392	0.391	0.391	0.391	0.391	0.391	0.391	0.391	0.391	0.391	0.391	0.391	0.391
Green River 4	KU	0.382	0.381	0.381	0.381	0.381	0.381	0.381	0.381	0.381	0.381	0.381	0.381	0.381	0.381	0.381	0.381	0.381	0.381	0.381	0.381	0.381
Tyrone 3	KU	0.381	0.381	0.383	0.384	0.388	0.382	0.383	0.383	0.388	0.386	0.388	0.389	0.392	0.398	0.391	0.391	0.391	0.391	0.391	0.391	0.391
Cane Run 4	LGE	0.325	0.326	0.326	0.327	0.327	0.328	0.329	0.328	0.328	0.328	0.328	0.328	0.328	0.328	0.328	0.328	0.328	0.328	0.328	0.328	0.328
Cane Run 5	LGE	0.373	0.375	0.379	0.379	0.379	0.374	0.373	0.374	0.377	0.378	0.378	0.380	0.381	0.382	0.383	0.385	0.385	0.385	0.385	0.387	0.388
Cane Run 6	LGE	0.308	0.308	0.309	0.306	0.305	0.303	0.301	0.302	0.302	0.303	0.304	0.305	0.306	0.306	0.307	0.307	0.307	0.307	0.307	0.309	0.309
Mill Creek 1	LGE	0.266	0.266	0.267	0.267	0.267	0.265	0.264	0.265	0.265	0.265	0.266	0.266	0.267	0.267	0.267	0.267	0.267	0.267	0.268	0.268	0.268
Mill Creek 2	LGE	0.252	0.252	0.252	0.252	0.252	0.252	0.252	0.252	0.252	0.252	0.252	0.252	0.252	0.252	0.252	0.252	0.252	0.252	0.252	0.252	0.252
Mill Creek 3	LGE	0.057	0.059	0.060	0.059	0.058	0.060	0.059	0.058	0.057	0.057	0.058	0.058	0.058	0.058	0.058	0.058	0.058	0.058	0.058	0.058	0.058
Mill Creek 4	LGE	0.039	0.039	0.040	0.040	0.039	0.041	0.040	0.041	0.041	0.040	0.040	0.040	0.040	0.040	0.039	0.039	0.039	0.041	0.039	0.040	0.039
Trimble County 1	LGE	0.049	0.047	0.047	0.047	0.047	0.048	0.049	0.048	0.048	0.048	0.048	0.048	0.048	0.048	0.047	0.048	0.047	0.048	0.047	0.047	0.048
Trimble County 2	KU	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Trimble County 2	LGE	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Peakers	KU	0.076	0.074	0.073	0.075	0.074	0.075	0.075	0.075	0.075	0.072	0.070	0.069	0.068	0.068	0.067	0.066	0.066	0.066	0.066	0.064	0.063
Peakers	LGE	0.072	0.070	0.070	0.071	0.071	0.072	0.072	0.072	0.072	0.073	0.069	0.069	0.068	0.068	0.067	0.066	0.066	0.066	0.064	0.064	0.063
SCRUBBER REMOVAL EFF.																						
Brown 1		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Brown 2		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Brown 3		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Ghent 1		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Ghent 2		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Ghent 3		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Ghent 4		0%	0%	0%	0%	0%	0%	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%	0%	0%	0%	0%	0%	0%
Green River 4		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Tyrone 3		0%	0%	0%	0%	0%	0%	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%	0%	0%	0%	0%	0%	0%
Cane Run 5		0%	0%	0%	0%	0%	0%	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%	0%	0%	0%	0%	0%	0%
Mill Creek 1		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Mill Creek 2		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Mill Creek 3		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Mill Creek 4		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Trimble County 1		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Trimble County 2		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Peakers		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Peakers		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
TONS NO_x EMITTED																						
Brown 1	KU	669	606	689	595	745	1,650	1,580	1,613	1,411	1,638	1,734	1,735	1,776	1,789	1,849	1,657	1,904	1,927	1,950	1,963	1,977
Brown 2	KU	669	767	684	787	844	1,811	1,773	1,807	1,823	1,810	1,842	1,840	1,875	1,896	1,894	1,928	1,939	1,763	1,978	2,003	2,007
Brown 3	KU	1,147	1,274	1,590	1,519	1,704	465	483	432	492	499	506	516	511	465	518	528	531	535	545	545	545
Ghent 1	KU	452	446	423	447	452	1,058	1,178	1,095	1,138	987	1,143	1,119	1,070	1,004	1,019	985	910	1,011	985	1,015	1,027
Ghent 2	KU	1,784	1,853	1,768	2,316	1,936	664	655	688	658	657	661	660	660	595	663	665	666	666	666	664	665
Ghent 3	KU	322	319	353	343	343	680	734	742	742	749	756	757	680	757	762	762	769	774	774	690	773
Ghent 4	KU	328	329	333	338	356	772	763	770	766	775	779	704	782	782	788	785	792	795	717	794	797
Green River 3	KU	284	301	364	342	321	770	670	725	775	798	851	773	906	907	949	946	997	1,013	869	1,025	1,058
Green River 4	KU	469	455	515	498	489	996	1,039	1,098	1,128	1,167	1,213	1,210	1,127	1,260	1,358	1,328	1,377	1,407	1,402	1,274	1,435
Tyrone 3	KU	276	300	378	358	340	665	697	761	808	806	856	890	898	907	1,002	972	1,044	1,048	1,078	966	1,092
Cane Run 4	LGE	766	784	801	760	718	1,386	1,087	1,345	1,321	1,466	1,467	1,514	1,587	1,411	1,717	1,678	1,741	1,790	1,793	1,817	1,835
Cane Run 5	LGE	880	823	869	848	735	1,640	1,483	1,592	1,656	1,731	1,630	1,877	1,983	2,008	2,090	2,122	2,203	1,972	2,280	2,291	2,340
Cane Run 6	LGE	1,069	1,122	1,019	971	965	2,126	1,926	2,029	2,070	2,061	2,210	2,021	2,333	2,279	2,413	2,393	2,495	2,528	2,589	2,610	2,610
Mill Creek 1	LGE	1,112	1,052	1,111	1,055	1,080	2,377	2,453	2,178	2,542	2,373	2,610	2,470	2,670	2,513	2,735	2,350	2,787	2,631	2,811	2,663	2,864
Mill Creek 2	LGE	1,027	1,146	948	1,128	1,098	2,501	2,067	2,487	2,363	2,546	2,415	2,587	2,450	2,620	2,303	2,688	2,535	2,725	2,569	2,757	2,604
Mill Creek 3	LGE	373	389	389	387	377	885	809	848	723	840	815	870	843	881	834	911	778	872	843	893	862
Mill Creek 4	LGE	301	308	316	309	308	682	677	652	699	598	711	671	720	667	715	671	744	616	738	685	748
Trimble County 1	LGE	304	296	296	296	300	729	670	719	652	720	669	720	622	715	659	714	664	717	656	722	808
Trimble County 2	KU	0	0	0	0	0	583	998	1,007	1,000	1,007	1,010	1,01									

Case05- Base + Gh2 SCR 2010, Br3 SCR 2016

		NO _x SUMMARY BY YEAR																				
Unit NO _x EMISS RATE (ppmH ₂)	Ownership	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025
Brown 1	KU	0.502	0.502	0.501	0.502	0.502	0.501	0.501	0.501	0.502	0.501	0.501	0.501	0.501	0.501	0.501	0.501	0.501	0.501	0.501	0.501	0.501
Brown 2	KU	0.321	0.320	0.321	0.320	0.320	0.320	0.320	0.320	0.320	0.320	0.320	0.320	0.320	0.320	0.320	0.320	0.320	0.320	0.320	0.320	0.320
Brown 3	KU	0.270	0.270	0.270	0.270	0.270	0.270	0.270	0.270	0.270	0.270	0.270	0.270	0.270	0.270	0.270	0.270	0.270	0.270	0.270	0.270	0.270
Ghent 1	KU	0.055	0.054	0.054	0.056	0.056	0.060	0.067	0.063	0.068	0.068	0.068	0.068	0.067	0.064	0.058	0.059	0.057	0.057	0.057	0.056	0.058
Ghent 2	KU	0.301	0.300	0.300	0.300	0.300	0.300	0.307	0.307	0.307	0.307	0.307	0.307	0.307	0.307	0.307	0.307	0.307	0.307	0.307	0.307	0.307
Ghent 3	KU	0.039	0.038	0.039	0.038	0.038	0.039	0.038	0.038	0.038	0.039	0.039	0.039	0.039	0.038	0.038	0.038	0.038	0.038	0.038	0.038	0.038
Ghent 4	KU	0.040	0.039	0.041	0.042	0.040	0.040	0.039	0.039	0.039	0.039	0.039	0.039	0.039	0.039	0.039	0.039	0.039	0.039	0.039	0.039	0.039
Green River 3	KU	0.392	0.393	0.392	0.392	0.391	0.392	0.393	0.393	0.392	0.392	0.392	0.392	0.392	0.392	0.391	0.391	0.391	0.391	0.391	0.391	0.391
Green River 4	KU	0.382	0.381	0.381	0.381	0.381	0.381	0.382	0.381	0.381	0.381	0.381	0.381	0.381	0.381	0.381	0.381	0.381	0.381	0.381	0.381	0.381
Tyrone 3	KU	0.381	0.381	0.383	0.384	0.388	0.382	0.383	0.388	0.386	0.388	0.386	0.388	0.389	0.392	0.388	0.391	0.391	0.391	0.391	0.391	0.391
Cane Run 4	LGE	0.325	0.326	0.326	0.327	0.327	0.328	0.328	0.328	0.328	0.328	0.328	0.328	0.328	0.328	0.328	0.328	0.328	0.328	0.328	0.328	0.328
Cane Run 5	LGE	0.373	0.375	0.379	0.379	0.379	0.374	0.373	0.374	0.377	0.378	0.378	0.380	0.381	0.382	0.383	0.385	0.385	0.385	0.385	0.387	0.388
Cane Run 6	LGE	0.308	0.308	0.309	0.306	0.305	0.303	0.301	0.303	0.303	0.304	0.305	0.305	0.306	0.306	0.307	0.307	0.308	0.308	0.309	0.309	0.309
Mill Creek 1	LGE	0.266	0.266	0.267	0.267	0.267	0.265	0.264	0.265	0.265	0.265	0.265	0.266	0.267	0.267	0.267	0.267	0.268	0.268	0.268	0.268	0.268
Mill Creek 2	LGE	0.252	0.252	0.252	0.252	0.252	0.252	0.252	0.252	0.252	0.252	0.252	0.252	0.252	0.252	0.252	0.252	0.252	0.252	0.252	0.252	0.252
Mill Creek 3	LGE	0.057	0.059	0.060	0.059	0.058	0.059	0.059	0.058	0.058	0.057	0.057	0.058	0.058	0.059	0.058	0.058	0.060	0.059	0.057	0.058	0.058
Mill Creek 4	LGE	0.039	0.039	0.040	0.040	0.039	0.041	0.040	0.040	0.041	0.040	0.040	0.040	0.040	0.040	0.039	0.039	0.041	0.039	0.040	0.039	0.040
Trimble County 1	LGE	0.049	0.047	0.047	0.047	0.047	0.048	0.048	0.048	0.048	0.047	0.048	0.048	0.049	0.047	0.048	0.047	0.048	0.047	0.047	0.047	0.048
Trimble County 2	LGE	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Peakers	KU	0.076	0.074	0.073	0.075	0.074	0.075	0.075	0.076	0.076	0.076	0.076	0.076	0.076	0.076	0.076	0.076	0.076	0.076	0.076	0.076	0.076
Peakers	LGE	0.072	0.070	0.070	0.071	0.071	0.072	0.072	0.074	0.073	0.073	0.073	0.073	0.073	0.073	0.073	0.073	0.073	0.073	0.073	0.073	0.073
SCRUBBER REMOVAL EFF.																						
Brown 1		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Brown 2		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Brown 3		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Ghent 1		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Ghent 2		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Ghent 3		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Ghent 4		0%	0%	0%	0%	0%	0%	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%	0%	0%	0%	0%	0%	0%
Green River 4		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Tyrone 3		0%	0%	0%	0%	0%	0%	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%	0%	0%	0%	0%	0%	0%
Cane Run 5		0%	0%	0%	0%	0%	0%	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%	0%	0%	0%	0%	0%	0%
Mill Creek 1		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Mill Creek 2		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Mill Creek 3		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Mill Creek 4		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Trimble County 1		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Trimble County 2		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Peakers		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Peakers		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
TONS NO_x EMITTED		2006	2006	2007	2008	2008	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025
Brown 1	KU	659	659	659	659	659	659	659	659	659	659	659	659	659	659	659	659	659	659	659	659	659
Brown 2	KU	659	659	659	659	659	659	659	659	659	659	659	659	659	659	659	659	659	659	659	659	659
Brown 3	KU	1,147	1,274	1,690	1,519	1,704	3,668	3,231	3,714	3,788	3,820	506	516	511	465	510	528	531	535	545	545	545
Ghent 1	KU	452	446	423	447	452	1,028	1,119	1,075	1,131	980	1,109	1,119	1,070	1,004	1,019	985	910	1,011	985	1,015	1,027
Ghent 2	KU	1,784	1,853	1,768	2,316	1,936	669	659	592	659	661	659	661	660	660	660	665	666	666	666	666	666
Ghent 3	KU	322	319	353	343	343	684	737	747	748	755	761	757	680	757	762	762	769	774	774	690	773
Ghent 4	KU	328	325	333	338	355	776	785	774	771	779	782	782	782	782	788	785	782	795	717	794	757
Green River 3	KU	284	301	364	342	321	762	667	722	770	793	832	773	906	907	949	946	997	1,013	889	1,025	1,059
Green River 4	KU	469	456	515	496	489	1,002	1,039	1,091	1,126	1,169	1,208	1,210	1,127	1,280	1,358	1,328	1,377	1,407	1,402	1,274	1,435
Tyrone 3	KU	276	300	378	358	340	676	683	758	800	827	854	880	859	907	1,002	972	1,044	1,048	1,075	966	1,092
Cane Run 4	LGE	786	784	801	760	718	1,381	1,104	1,344	1,317	1,453	1,471	1,514	1,597	1,411	1,717	1,678	1,741	1,760	1,793	1,817	1,835
Cane Run 5	LGE	850	823	959	848	735	1,636	1,478	1,587	1,650	1,735	1,627	1,877	1,983	2,006	2,080	2,122	2,203	1,872	2,280	2,281	2,340
Cane Run 6	LGE	1,089	1,122	1,019	971	965	2,188	1,949	2,057	2,105	2,118	2,236	2,021	2,333	2,279	2,413	2,393	2,495	2,528	2,270	2,995	2,610
Mill Creek 1	LGE	1,112	1,062	1,111	1,056	1,080	2,411	2,481	2,206	2,676	2,419	2,644	2,470	2,670	2,513	2,735	2,360	2,787	2,631	2,811	2,683	2,864
Mill Creek 2	LGE	1,027	1,146	948	1,128	1,098	2,544	2,120	2,517	2,387	2,584	2,447	2,587	2,480	2,620	2,303	2,668	2,535	2,725	2,569	2,757	2,604
Mill Creek 3	LGE	373	389	389	387	377	890	814	851	728	846	821	870	843	881	834	911	778	872	843	893	862
Mill Creek 4	LGE	301	308	316	309	308	669	681	657	705	603	717	671	720	667	715	671	744	616	738	685	748
Trimble County 1	LGE	304	296	296	296	300	729	682	722	658	717	665	720	622	715	656	714	664	717	656	722	608
Trimble County 2	KU	0	0	0	0	0	685	1,000	1,009	1,003	1,009	1,012	1,013									

APPENDIX F

NO_x Spot Daily Market Price Indicators (January 1, 2004 to January 14, 2005)



This information was provided by Cantor Fitzgerald.