



Matthew G. Bevin
Governor

Charles G. Snively
Secretary
Energy and Environment Cabinet

Commonwealth of Kentucky
Public Service Commission
211 Sower Blvd.
P.O. Box 615
Frankfort, Kentucky 40602-0615
Telephone: (502) 564-3940
Fax: (502) 564-3460
psc.ky.gov

Michael J. Schmitt
Chairman

Robert Cicero
Vice Chairman

Daniel E. Logsdon Jr.
Commissioner

February 17, 2017

PARTIES OF RECORD

Re: Case No. 2016-00437
Case No. 2016-00438

Attached is a copy of a memorandum which is being filed in the record of the above-referenced cases. If you have any comments you would like to make regarding the contents of the memorandum please do so within five days of receipt of this letter. If you have any questions, please contact Jennifer Fell, Staff Attorney, at 502/782-2585.

Sincerely,

A handwritten signature in blue ink that reads "Talina R. Mathews".

Talina Mathews
Executive Director

Enclosures

INTRA-AGENCY MEMORANDUM ADDENDUM
KENTUCKY PUBLIC SERVICE COMMISSION

TO: Case File – Case No. 2016-00437
Case No. 2016-00438

FROM: Mary Whitaker, Financial Analyst

DATE: February 17, 2017

RE: Informal Conference of February 14, 2017

Pursuant to the Commission's January 4, 2017 procedural order, an informal conference ("IC") was held in this matter on February 14, 2017. A list of attendees is attached.

Beginning the conference, Kentucky Utilities Company ("KU") and Louisville Gas & Electric Company ("LG&E") (collectively, "the Companies") distributed a presentation, a copy of which is attached. The presentation discussed the Companies' over/under positions, progress on the most recent environmental compliance plan ("2016 Plan") as approved in Case Nos. 2016-00026¹ and 2016-00027,² and updated rate of return calculations for the review period. The Companies provided an illustrative example of the calculation of amortization expense for projects included in the 2016 Plan, a copy of which is attached.

Commission Staff ("Staff") asked clarifying questions regarding the calculation of deferred taxes included in the Companies' responses to Commission Staff's Initial Request for Information ("Staff's First Request"), Item 3. The Companies explained that qualifying components of projects are eligible for accelerated depreciation for tax purposes and the amounts shown are state and federal after appropriate offsets. Staff also asked clarifying questions regarding adjustments to total capitalization included in the Companies' responses to Staff's First Request, Item 5. The Companies explained that the schedules provided calculate the weighted cost of capital as determined in the Companies' base rate cases and that the adjustments do not affect the capital structure used in the calculation of the Companies' rates of return.

Staff confirmed with the Companies that in future review cases, the procedural order establishing the case should not provide for an IC. If either Staff or the Companies feel an IC is necessary, one may be requested and scheduled separately.

Finding that no party had any further questions, the conference was adjourned.

¹ Case No. 2016-00026, *Application of Kentucky Utilities Company for Certificates of Public Convenience and Necessity and Approval of Its 2016 Compliance Plan for Recovery by Environmental Surcharge* (Ky. PSC Aug. 8, 2016).

² Case No. 2016-00027, *Application of Louisville Gas and Electric Company for Certificates of Public Convenience and Necessity and Approval of Its 2016 Compliance Plan for Recovery by Environmental Surcharge* (Ky. PSC Aug. 8, 2016).

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC EXAMINATION BY THE
PUBLIC SERVICE COMMISSION OF
THE ENVIRONMENTAL SURCHARGE
MECHANISM OF KENTUCKY UTILITIES
COMPANY FOR THE SIX-MONTH
BILLING PERIOD ENDING
OCTOBER 31, 2016

CASE NO. 2016-00437

AND

ELECTRONIC EXAMINATION BY THE
PUBLIC SERVICE COMMISSION OF
THE ENVIRONMENTAL SURCHARGE
MECHANISM OF LOUISVILLE GAS
AND ELECTRIC COMPANY FOR THE
SIX-MONTH BILLING PERIOD ENDING
OCTOBER 31, 2016

CASE NO. 2016-00438

SIGN IN

February 14, 2017

PERSON

REPRESENTING

Mary Whitaker	PSC - FA
Chris Garrett	LGE - KU
Heather Metts	LGE & KU
Derek Rahn	LGE / KU
Jason Knox	LGE / KU
Sara Veeneman	LGE / KU
Ron Handziak	PSC - FA

Jennifer Fell

PSC Legal



PPL companies

ECR Review Case Nos. 2016-00437 and 2016-00438

February 14, 2017



Overview

- Review Period:
 - *Six-month review period for expense months of March 2016 through August 2016*
 - *ECR Plans in effect: 2009, 2011, 2016*
- 2016 Plan Update
- Tax Update
- Revision to Rate of Return
- Recommendation
- Next Steps

Over/(Under) Reconciliation

	<u>KU</u>	<u>LG&E</u>
Combined Over/(Under) Recovery	\$110,995	\$1,697,822
Due to Change in Rate of Return	(1,255,844)	(2,362,837)
Use of 12-Month Average Revenues	1,366,839	4,060,659

- Change in Rate of Return
 - *Increase in weighted average cost of debt*
- Average Revenues
 - *Over recovery driven by warmer than average weather*

Over/(Under) Recovery Position

- KU: over-recovery position
 - *Total over-recovery for the 6-month period is \$110,995*
 - *Recommend distribution over 1 month*
 - *Impact to residential customer using 1,090 kWh/mo is (\$0.11) for one month*
- LG&E: over-recovery position
 - *Total over-recovery for the 6-month period is \$1,697,822*
 - *Recommend distribution over 2 months*
 - *Impact to residential customer using 974 kWh/mo is (\$0.98) per month for two months*

2016 Plan Update (CN 2016-00026/00027)

- Project cost recovery started in July 2016 expense month
- Forms were modified to incorporate new projects and lower ROE Ordered for 2016 Plan
- KU CCR capital spend through August was \$4.95 M
 - *Amortization through August \$38.1 K*
 - *August net unamortized balance \$417.6 K*
- LG&E CCR capital spend through August was \$3.16 M
 - *Amortization through August \$ 18.8 K*
 - *August net unamortized balance \$894.7 K*

2016 Plan Update (cont.)

Closure Projects Through 8/31/16

		KU	LG&E
(1)	Capital Expenditures	\$4,950,856	\$3,158,912
(2)	Net Capital Spend (less amount in base rates)	\$696,060	\$1,479,612
(3)	Net Amortization Expense ¹	\$12,574	\$15,291
(4)	Unamortized Balance	(4) = (2) - (3)	\$683,487
(5)	Deferred Income Tax	(5) = (4) x 0.389	\$265,876
(6)	Net Unamortized Balance	(6) = (4) - (5)	\$417,610

Note 1: Actual capital spend at Brown, Ghent, and Trimble Stations have not exceeded the amount in base rates through August 2016. Therefore, the capital/amortization expense is not incorporated in calculation of the unamortized balance.

Tax Update

- Continued use of 38.6660% effective income tax rate for the rate of return true-up calculations; excludes Section 199 deduction
 - *Consistent with Commission's Orders in the most recent review cases*

Rate of Return

- 10.00% ROE for pre-2016 ECR Plans
 - *Consistent with prior ECR six-month review Orders in Case Nos. 2016-00214 and 2016-00215 (issued March 16, 2016)*
- 9.80% ROE for 2016 ECR Plan
 - *Consistent with 2016 ECR Plan Orders in Case Nos. 2016-00026 and 2016-00027*
- Proposed rate of return going forward using 10.00% ROE for pre-2016 ECR Plans
 - *10.62% for KU*
 - *10.58% for LG&E*
- Proposed rate of return going forward using 9.80% ROE for 2016 ECR Plan
 - *10.44% for KU*
 - *10.40% for LG&E*

Rate of Return (cont.)

- First Request for Information #1 and #5 requested data as of October 31, 2016 (end of billing period)
- Prior 6-month review requested information as of February 29, 2016 (end of expense period)
- The prior 6-month review for expense months of March through August (CN 2015-00411 & -00412) initial Order was corrected to request data as of August 31, 2015 instead of October 31, 2015 for #1
 - #5 requested information as of August 31, 2015
- Initial responses were again prepared using end of expense period to be consistent with most recent review cases

Recommendations - KU and LG&E

- Approve distribution of KU's over-recovery position:
 - *Over-recovery of \$110,995 distributed over one month*
- Approve distribution of LG&E's over-recovery position:
 - *Over-recovery of \$1,697,822 distributed over a two-month period*
- Find environmental surcharge amounts for the billing periods ending October 2016 just and reasonable
- Approve the use of an overall rate of return on capital using a ROE of 10.00% beginning in the second billing month following the Commission's Order for pre-2016 ECR Plans
 - *10.62% for KU*
 - *10.58% for LG&E*
- Approve the use of an overall rate of return on capital using a ROE of 9.80% beginning in the second billing month following the Commission's Order for the 2016 ECR Plan
 - *10.44% for KU*
 - *10.40% for LG&E*

Next Steps

Procedural Schedule

- *All additional requests for information to KU and LG&E March 14*
- *KU and LG&E shall file responses March 28*
- *Intervenor testimony, if any, to be filed April 11*
- *All requests for information to Intervenors April 25*
- *Intervenors shall file responses May 9*
- *Last day for KU and LG&E to request a hearing or submit the case for decision based on the record..... May 23*

Date	Year	Month	Green River Station			Pineville Station			Tyronne Station			Amortization (All)	
			\$640,255	\$637,064	\$3,191	\$59,813	\$56,094	\$3,719	\$60,378	\$55,166	\$5,211	Total	Cumulative
			Capital Spend	July 2016 Amortization	August 2016 Amortization	Capital Spend	July Amortization	August Amortization	Capital Spend	July 2016 Amortization	August 2016 Amortization		
7/1/2016	1	1	\$637,064	\$5,309		\$56,094	\$467		\$55,166	\$460		\$6,236	\$6,236
8/1/2016	1	2	\$3,191	\$5,309	\$27	\$3,719	\$467	\$31	\$5,211	\$460	\$44	\$6,338	\$12,574
9/1/2016	1	3		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$18,912
10/1/2016	1	4		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$25,250
11/1/2016	1	5		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$31,588
12/1/2016	1	6		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$37,926
1/1/2017	1	7		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$44,263
2/1/2017	1	8		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$50,601
3/1/2017	1	9		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$56,939
4/1/2017	1	10		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$63,277
5/1/2017	1	11		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$69,615
6/1/2017	1	12		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$75,953
7/1/2017	2	13		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$82,291
8/1/2017	2	14		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$88,629
9/1/2017	2	15		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$94,967
10/1/2017	2	16		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$101,304
11/1/2017	2	17		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$107,642
12/1/2017	2	18		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$113,980
1/1/2018	2	19		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$120,318
2/1/2018	2	20		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$126,656
3/1/2018	2	21		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$132,994
4/1/2018	2	22		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$139,332
5/1/2018	2	23		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$145,670
6/1/2018	2	24		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$152,008
7/1/2018	3	25		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$158,346
8/1/2018	3	26		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$164,683
9/1/2018	3	27		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$171,021
10/1/2018	3	28		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$177,359
11/1/2018	3	29		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$183,697
12/1/2018	3	30		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$190,035
1/1/2019	3	31		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$196,373
2/1/2019	3	32		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$202,711
3/1/2019	3	33		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$209,049
4/1/2019	3	34		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$215,387
5/1/2019	3	35		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$221,724
6/1/2019	3	36		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$228,062
7/1/2019	4	37		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$234,400
8/1/2019	4	38		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$240,738
9/1/2019	4	39		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$247,076
10/1/2019	4	40		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$253,414
11/1/2019	4	41		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$259,752
12/1/2019	4	42		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$266,090
1/1/2020	4	43		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$272,428
2/1/2020	4	44		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$278,766
3/1/2020	4	45		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$285,103
4/1/2020	4	46		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$291,441
5/1/2020	4	47		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$297,779
6/1/2020	4	48		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$304,117
7/1/2020	5	49		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$310,455
8/1/2020	5	50		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$316,793
9/1/2020	5	51		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$323,131
10/1/2020	5	52		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$329,469
11/1/2020	5	53		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$335,807
12/1/2020	5	54		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$342,144
1/1/2021	5	55		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$348,482
2/1/2021	5	56		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$354,820
3/1/2021	5	57		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$361,158
4/1/2021	5	58		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$367,496
5/1/2021	5	59		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$373,834
6/1/2021	5	60		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$380,172

Date	Year	Month	Green River Station			Pineville Station			Tyrone Station			Amortization (All)	
			\$640,255	\$637,064	\$3,191	\$59,813	\$56,094	\$3,719	\$60,378	\$55,166	\$5,211	Total	Cumulative
			Capital Spend	July 2016 Amortization	August 2016 Amortization	Capital Spend	July Amortization	August Amortization	Capital Spend	July 2016 Amortization	August 2016 Amortization		
7/1/2021	6	61		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$386,510
8/1/2021	6	62		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$392,848
9/1/2021	6	63		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$399,185
10/1/2021	6	64		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$405,523
11/1/2021	6	65		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$411,861
12/1/2021	6	66		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$418,199
1/1/2022	6	67		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$424,537
2/1/2022	6	68		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$430,875
3/1/2022	6	69		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$437,213
4/1/2022	6	70		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$443,551
5/1/2022	6	71		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$449,889
6/1/2022	6	72		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$456,227
7/1/2022	7	73		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$462,564
8/1/2022	7	74		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$468,902
9/1/2022	7	75		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$475,240
10/1/2022	7	76		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$481,578
11/1/2022	7	77		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$487,916
12/1/2022	7	78		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$494,254
1/1/2023	7	79		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$500,592
2/1/2023	7	80		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$506,930
3/1/2023	7	81		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$513,268
4/1/2023	7	82		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$519,605
5/1/2023	7	83		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$525,943
6/1/2023	7	84		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$532,281
7/1/2023	8	85		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$538,619
8/1/2023	8	86		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$544,957
9/1/2023	8	87		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$551,295
10/1/2023	8	88		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$557,633
11/1/2023	8	89		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$563,971
12/1/2023	8	90		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$570,309
1/1/2024	8	91		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$576,647
2/1/2024	8	92		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$582,984
3/1/2024	8	93		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$589,322
4/1/2024	8	94		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$595,660
5/1/2024	8	95		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$601,998
6/1/2024	8	96		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$608,336
7/1/2024	9	97		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$614,674
8/1/2024	9	98		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$621,012
9/1/2024	9	99		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$627,350
10/1/2024	9	100		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$633,688
11/1/2024	9	101		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$640,025
12/1/2024	9	102		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$646,363
1/1/2025	9	103		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$652,701
2/1/2025	9	104		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$659,039
3/1/2025	9	105		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$665,377
4/1/2025	9	106		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$671,715
5/1/2025	9	107		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$678,053
6/1/2025	9	108		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$684,391
7/1/2025	10	109		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$690,729
8/1/2025	10	110		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$697,067
9/1/2025	10	111		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$703,404
10/1/2025	10	112		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$709,742
11/1/2025	10	113		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$716,080
12/1/2025	10	114		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$722,418
1/1/2026	10	115		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$728,756
2/1/2026	10	116		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$735,094
3/1/2026	10	117		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$741,432
4/1/2026	10	118		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$747,770
5/1/2026	10	119		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$754,108
6/1/2026	10	120		\$5,309	\$27		\$467	\$31		\$460	\$44	\$6,338	\$760,445

*Honorable Allyson K Sturgeon
Senior Corporate Attorney
LG&E and KU Energy LLC
220 West Main Street
Louisville, KENTUCKY 40202

*Rick E Lovekamp
Manager - Regulatory Affairs
LG&E and KU Energy LLC
220 West Main Street
Louisville, KENTUCKY 40202

*Robert Conroy
LG&E and KU Energy LLC
220 West Main Street
Louisville, KENTUCKY 40202

*Louisville Gas and Electric Company
220 W. Main Street
P. O. Box 32010
Louisville, KY 40232-2010

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220 W. Main Street
P. O. Box 32010
Louisville, KY 40232-2010