

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF KENTUCKY)	
UTILITIES COMPANY FOR APPROVAL OF ITS)	CASE NO.
2020 COMPLIANCE PLAN FOR RECOVERY BY)	2020-00060
ENVIRONMENTAL SURCHARGE)	

COMMISSION STAFF'S INITIAL REQUEST FOR INFORMATION
TO KENTUCKY UTILITIES COMPANY

Kentucky Utilities Company (KU), pursuant to 807 KAR 5:001, is to file with the Commission an electronic version of the following information. The information requested herein is due on May 22, 2020. The Commission directs KU to the Commission's March 16, 2020 and March 24, 2020 Orders in Case No. 2020-00085¹ regarding filings with the Commission. The Commission expects the original documents to be filed with the Commission within 30 days of the lifting of the current state of emergency. All responses in paper medium shall be appropriately bound, tabbed, and indexed. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the name of the witness responsible for responding to the questions related to the information provided. Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the

¹ Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC Mar. 16, 2020), Order at 5–6. Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC Mar. 24, 2020), Order at 1–3.

preparer or the person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

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

Careful attention shall be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, KU shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to the application, page 5, and application Exhibit 1, page 1 of 2. For Project 43, provide a chart of necessary permits including the issuing authority, status, and actual or estimated dates filed and received.

2. Refer to the application, page 7, and application Exhibit 1, page 1 of 2. For Project 44, provide a chart of necessary permits necessary permits including the issuing authority, status, and actual or estimated dates filed and received.

3. Refer to the Direct Testimony of Robert M. Conroy (Conroy Testimony), page 3, regarding KU's expectations in 2016 of future compliance expenditures related to the 2015 Effluent Limitations Guidelines Rule (2015 ELG Rule). State whether KU anticipates any additional 2015 ELG Rule related compliance expenditures beyond those proposed in the instant matter.

4. Refer to the Conroy Testimony, page 4, the Direct Testimony of Gary H. Revlett (Revlett Testimony), page 11, and the Direct Testimony of R. Scott Straight (Straight Testimony), pages 7–8.

a. Water usage at the Brown Generating Station (Brown) differs from water usage at the Ghent Generating Station (Ghent), the Trimble County Generating Station (Trimble County), and the Mill Creek Generating Station (Mill Creek). Explain whether Brown is able to achieve “net neutral” to “water-negative” operation solely because of the number of operating generating units.

b. Assuming water discharge is not eliminated at Brown, describe what steps would have to be taken to bring it into compliance with the 2015 ELG Rule and 2019 proposed revisions.

c. State how quickly the steps to comply with the 2015 ELG Rule and 2019 proposed revisions could be completed.

5. Refer to the Conroy Testimony, page 9. Describe in more detail the plans to finance the projects, including estimates on the debt and equity mix.

6. Refer to the Revlett Testimony, pages 6–7, regarding the 2019 proposed revisions to the flue gas desulfurization (FGD) wastewater limits and the bottom ash transport water (BATW) wastewater limits.

a. Provide the current daily and monthly effluent discharges of arsenic, mercury, selenium, and nitrates/nitrites in FGD wastewater for Trimble County and Ghent.

b. Provide the current daily discharge for BATW wastewater at Trimble County and Ghent.

7. Refer to the Revlett Testimony, page 9, regarding the deadline for compliance with the proposed revision to the 2015 ELG Rule. State whether KU has any expectation as to when the Division of Water (KDOW) will make a determination as to what the final compliance deadline date will be, and if so, provide the date KU anticipates that the KDOW to finalize that determination.

8. Refer to the Revlett Testimony, pages 9–10, regarding the need to comply with the 2015 ELG Rule with respect to the limitations on selenium and nitrates/nitrites in FGD wastewater. State whether KU has conducted or performed a study on the cost of compliance for Trimble County and Ghent for selenium and nitrates/nitrites limits as set forth in the 2015 ELG Rule. If so, provide a copy of the study.

9. Refer to the Revlett Testimony, pages 10–11. Explain in more detail why a diffuser and a BATW recirculation system are needed for Ghent.

10. Refer to the Straight Testimony, page 6.

a. Explain the method and timing for issuing requests for proposals in relation to the proposed projects.

b. State whether the two vendors referenced in the testimony will be preferred for the purposes of these projects.

c. State whether international vendors will be considered for the proposed projects.

11. Refer to the Straight Testimony, page 6, lines 7–9 and Exhibit SAW-1, pages 24–28 of 41. Explain whether KU evaluated using a dry bottom-ash transport system at Ghent. If so, provide the results of that analysis.

12. Refer to the Straight Testimony, pages 6–7, regarding the benefits in moving forward with the proposed projects now rather than waiting. State whether KU has performed any analysis to quantify the reduction in risks and costs. If so, provide a copy of that analysis.

13. Refer to the Straight Testimony, pages 22, 23, and 25.

a. Explain whether the ELG water treatment systems will require KU to hire additional personnel.

b. Refer also to the Direct Testimony of Andrea M. Fackler, page 5, lines 21–23. Explain whether KU is seeking to recover incremental expense associated with additional personnel through the Environmental Cost Recovery Surcharge.



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DATED MAY 06 2020

cc: Parties of Record

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