

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC JOINT APPLICATION OF	)	
KENTUCKY UTILITIES COMPANY AND	)	
LOUISVILLE GAS AND ELECTRIC COMPANY	)	
FOR CERTIFICATES OF PUBLIC	)	
CONVENIENCE AND NECESSITY AND SITE	)	CASE NO.
COMPATIBILITY CERTIFICATES AND	)	2022-00402
APPROVAL OF A DEMAND SIDE MANAGEMENT	)	
PLAN AND APPROVAL OF FOSSIL FUEL-FIRED	)	
GENERATING UNIT RETIREMENTS	)	

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

Kentucky Utilities Company and Louisville Gas and Electric Company (jointly, LG&E/KU), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due no later than September 15, 2023. The Commission directs LG&E/KU to the Commission's July 22, 2021 Order in Case No. 2020-00085<sup>1</sup> regarding filings with the Commission. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the question to which the response is made and 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

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<sup>1</sup> Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC July 22, 2021), Order (in which the Commission ordered that for case filings made on and after March 16, 2020, filers are NOT required to file the original physical copies of the filings required by 807 KAR 5:001, Section 8).

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

LG&E/KU shall make timely amendment to any prior response if LG&E/KU obtains information that indicates the response was incorrect or incomplete when made or, though correct or complete when made, is now incorrect or incomplete in any material respect.

For any request to which LG&E/KU fails or refuses to furnish all or part of the requested information, LG&E/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 and scanned 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, LG&E/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 Excel spreadsheet filed with LG&E/KU's supplemental response to Commission Staff's Second Request for Information (Staff's Second Request) (filed May 11, 2023), Item 38, cells C4–C10, D4–D10, F4–F10, G4–G10, I4–

I10, J4-J10, L4-L10, and M4-M1, which contain hardcoded dollar amounts. Provide the workpapers that support the DSM-EE program-specific TRC benefit amounts in cells C4–C10, TRC cost amounts in cells D4–D10, PAC benefit amounts in cells F4–10, PAC cost amounts in cells G4–G10, PCT benefit amounts in cells I4–I10, PCT cost amounts in cells J4–J10, RIM benefit amounts in cells L4–L10, and RIM cost amounts in cells M4–M10.

2. Refer to LG&E/KU's response to Staff's Second Request, Item 30, which was nonresponsive. Provide the Achievable Potential for the proposed Business Solutions program in a table similar to the Direct Testimony of Lana Isaacson, Exhibit LI-2, 2023 LG&E/KU Demand Response Assessment, Appendix C, Table C-1, page C-27.

3. Refer to Kentucky Coal Association (KCA) Hearing Exhibit 3. Provide a list of all LG&E/KU executives who received ESG-based performance units compensation and the maximum potential values as of the grant date for that compensation.

4. Refer to the Direct Testimony of John Bevington (Bevington Direct Testimony), page 6, lines 11–14, which references that LG&E/KU surveyed the demand Side Management-Energy Efficiency (DSM/EE) Advisory Group to solicit input for developing new and updated DSM-EE. Provide the results of the DSM-EE Advisory Group 2021 survey.

5. Refer to the Bevington Direct Testimony, page 6, lines 13–14. Provide the minutes of LG&E/KU's 2021 meetings with the DSM-EE Advisory Group.

6. Refer to Joint Intervenors' response to LG&E/KU's First Request for Information, Item 31, which is a letter dated December 14, 2022, from some of the DSM-EE Advisory Group members regarding LG&E/KU providing material related to underlying inputs and assumptions in the DSM-EE analysis. Provide a copy of any documents

referenced in that letter that were provided to the DSM-EE Advisory Group that have not already been filed into this proceeding.

7. Refer to the August 23, 2023 hearing testimony of Lonnie Bellar (Bellar August 23, 2023 Hearing testimony). Provide a detailed timeline and documentary support of Mr. Bellar's direction to LG&E/KU staff to reassess LG&E/KU's DSM-EE programs to address changing circumstances after October 2020, with the reassessment of generation retirement dates, changing environmental compliance laws, and changing load.

8. Refer to the August 22, 2023 hearing testimony of Lonnie Bellar. Provide a table showing the effect the loss of gas pressure arising from Winter Storm Elliot would have had on the equivalent forced outage rate for each affected unit if it had been reported to the North American Electric Reliability Corporation's (NERC) Generating Availability Data System (GADS).

9. Refer to LG&E/KU's response to Commission Staff's First Request for Information (Staff's First Request), Item 100. Provide an explanation for the increase in the forced outage rate for Ghent Unit 4 and Cane Run Unit 7, respectively, in 2022.

10. Refer to LG&E/KU's response to Staff's First Request, Item 100. Provide the equivalent forced outage rates for each thermal generation unit in LG&E/KU's fleet in 2018, 2019, 2020, 2021, and 2022.

11. Refer to the May 10, 2023 Direct Testimony of Stuart A. Wilson (Wilson May 10, 2023 Direct Testimony), Exhibit SB4-1, Table 11: Total Stay-Open Costs (Table 11). Also refer to Bellar August 23, 2023 Hearing Testimony. Provide a schedule itemizing

the type and amount of avoided costs that are included in ongoing costs in the stay-open cost analysis contained in Table 11 for each of the referenced generation facilities.

12. Refer to the Wilson May 10, 2023 Direct Testimony, Exhibit SB4-1, Table 11. Also refer to Case No. 2020-00061,<sup>2</sup> Direct Testimony of Stuart A. Wilson (Wilson Direct Testimony), Exhibit SAW-1, Table 4: Stay-Open Costs. Finally, refer to Case No. 2020-00350,<sup>3</sup> Direct Testimony of Lonnie E. Bellar (Bellar Direct Testimony), Exhibit LEB-2, Table 8: Stay Open Costs (Table 8).

a. Describe the categories of costs included in each of the three tables, including whether “ongoing maintenance” stay open costs as used in Table 11 refers to the same costs as “annual” stay open costs as used in Table 8.

b. Provide a table or spreadsheet with an itemized breakdown of the type and amount of costs for each generating unit for each year included in each table.

c. Explain any differences in the total or itemized costs in each table for each generating unit in each year.

13. Refer to Bellar August 23, 2023 Hearing Testimony regarding the Winter Storm Elliott root cause exercise conducted by LG&E/KU. Provide the documents that summarize the root cause exercise analysis and conclusions.

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<sup>2</sup> Case No. 2020-00061, *Electric Application of Louisville Gas and electric Company for Approval of an Amended Environmental Compliance Plan and a Revised Environmental Surcharge* (filed Mar. 31, 2020), Application, Direct Testimony of Stuart A. Wilson.

<sup>3</sup> Case No. 2020-00350, *Electronic Application of Louisville Gas and Electric Company for an Adjustment of its Electric and Gas Rates, A certificate of Public Convenience and Necessity to Deploy Advanced Metering Infrastructure, Approval of Certain Regulatory and Accounting Treatments, and Establishment of a One-Year Surcredit* (filed Nov. 25, 2020), Application, Direct Testimony of Lonnie E. Bellar.

14. Provide a copy of the reserve sharing agreement between LG&E/KU and the Tennessee Valley Authority (TVA) that was in effect during Winter Storm Elliot and any amendments to that agreement since that time, including any agreement executed in June 2023. Explain any material changes to the agreement since Winter Storm Elliot.

15. Refer to LG&E/KU's response to Commission Staff's Second Request for Information (Staff's Second Request), Item 53(b), which states that transmission upgrades would cost between \$39 million and \$52 million in the scenario in which Mill Creek Units 1 and 2, and Brown Unit 3 were retired; Ghent Unit 2 remained open with SCR; and only one NGCC was constructed, located at Mill Creek Station. Also refer to LG&E/KU's response to Joint Intervenors' Second Request for Information (Joint Intervenors' Second Request), Item 60(a), Exhibit SAW-1 (May 2023 Update), Table 35: Transmission System Upgrade Costs, which states that transmission upgrades would cost about \$35 million in the same scenario. Reconcile the difference in the two responses and state the estimated transmission upgrade costs for that scenario.

16. Refer to LG&E/KU's November 18, 2022 transmission impact analysis titled *Generation Replacement & Retirement Scenarios—Expected Impacts* filed as part of Exhibit SAW-2.

a. State whether the scenarios analyzed in that analysis included any retirements or additions other than those specifically mentioned in the Executive Summary, including specifically whether the scenarios included the retirement of Paddy's Run Unit 12 or Haefling Units 1-2, or the addition of the utility owned solar, the Purchase Power Agreements (PPAs), or the Brown battery energy storage system (Brown BESS)

proposed in this case. If a scenario included any retirement or addition other than those specifically mentioned, identify and describe the retirement or addition included.

b. State whether the retirement of Paddy's Run Unit 12 and Haefling Units 1-2 would have an effect the cost of necessary transmission upgrades in any scenario discussed, and if so, identify and describe those effects.

c. State whether the addition of the utility owned solar, PPAs, or Brown BESS would eliminate the need for any transmission upgrades identified in Scenarios 1, 2, 3 or 4, and if so, identify the resource additions that would eliminate the need for the transmission upgrades, in whole or in part, and identify and describe the effects of the relevant additions on the need for transmission upgrades.

d. Describe and provide the cost of any transmission upgrades that would be necessary to operate Mill Creek Unit 2 and Mill Creek Unit 5 at the same time.

e. Describe and provide the cost of any transmission upgrades that would be necessary to operate Brown Unit 3 and Brown Unit 12 at the same time.

17. Refer to the August 24, 2023 hearing testimony of Stuart A. Wilson (Wilson August 24, 2023 Hearing Testimony). Also refer to LG&E/KU's response to Joint Intervenors' Second Request, Item 60(a), Exhibit SAW-1 (May 2023 Update), page E-2 referring to LG&E's use of gas price forecasts based on the U.S. Energy Information Administration's (EIA) forecasts in its 2022 Annual Energy Outlook ("AEO2022").

a. Provide the projection tables in Excel spreadsheet format for Coal Supply, Disposition, and Price and Coal Production and Minemouth Prices by Region for EIA's AEO2022 Reference Case, Low Oil and Gas Supply Case, and High Oil and Gas Supply Case.

b. Provide the projection tables in Excel spreadsheet format for Natural Gas Supply, Disposition, and Price for EIA's AEO2022 Reference Case, Low Oil and Gas Supply Case, and High Oil and Gas Supply Case.

18. Refer to the Wilson August 24, 2023 Hearing Testimony. Provide an Excel spreadsheet showing coal and gas price projections made for each scenario in LG&E/KU's 2021 Integrated Resource Plan and showing the calculation of the coal to gas price ratio from the projections in each scenario.

19. Refer to the Wilson August 24, 2023 Hearing Testimony. Refer to the May 10, 2023 Direct Testimony of Stuart A. Wilson (Wilson May 10, 2023 Direct Testimony), Exhibit SB4-1, Table 5: 2028 Reliability Analysis (Table 5). Provide a version of Table 5 in which the summer loss of load expectations (LOLEs) for each portfolio reflect the months of March to November instead of June to August.

20. Refer to the Wilson August 24, 2023 Hearing Testimony. Refer to the Wilson May 10, 2023 Direct Testimony, Exhibit SB4-1, Table 5. Using the same assumptions as used in Table 5, calculate the summer (March-November), winter (January-February, December), and total LOLE, LOLH and EUE, and the NPVRR (on and absolute and relative basis, compared to the proposed portfolio and retirements) for each of the following portfolios (do not include the "Add DSM," as that term is used in Table 5, in any portfolio):

a. No Retirements as that term is used in Table 5 (i.e. Portfolio 0 without the Add DSM).

b. Retire Mill Creek Unit 1, Haefling Unit 1 and Unit 2, and Paddy's Run Unit 12; Add Mill Creek Unit 5.

- c. Retire Mill Creek Unit 1, Haefling Unit 1 and Unit 2, and Paddy's Run Unit 12; Add Brown Unit 12.
- d. Retire Mill Creek Unit 1 and Unit 2, Haefling Unit 1 and Unit 2, and Paddy's Run Unit 12; Add Mill Creek Unit 5.
- e. Retire Mill Creek Unit 1 and Unit 2, Haefling Unit 1 and Unit 2, and Paddy's Run Unit 12; Add Mill Creek Unit 5, and Owned Solar.
- f. Retire Mill Creek Unit 1 and Unit 2, Haefling Unit 1 and Unit 2, and Paddy's Run Unit 12; Add Mill Creek Unit 5, Owned Solar, and Solar PPAs.
- g. Retire Mill Creek Unit 1 and Unit 2, Haefling Unit 1 and Unit 2, and Paddy's Run Unit 12; Add Mill Creek Unit 5, Owned Solar, Brown BESS, and Solar PPAs.
- h. Retire Mill Creek Unit 1, Brown Unit 3, Haefling Unit 1 and Unit 2, and Paddy's Run Unit 12; Add Brown Unit 12.
- i. Retire Mill Creek Unit 1, Brown Unit 3, Haefling Unit 1 and Unit 2, and Paddy's Run Unit 12; Add Brown Unit 12, and Owned Solar.
- j. Retire Mill Creek Unit 1, Brown Unit 3, Haefling Unit 1 and Unit 2, and Paddy's Run Unit 12; Add Brown Unit 12, Owned Solar, and Solar PPAs.
- k. Retire Mill Creek Unit 1, Brown Unit 3, Haefling Unit 1 and Unit 2, and Paddy's Run Unit 12; Add Brown Unit 12, Owned Solar, Brown BESS, and Solar PPAs.
- l. Retire Mill Creek Unit 1 and Unit 2, Brown Unit 3, Haefling Unit 1 and Unit 2, and Paddy's Run Unit 12; Add Mill Creek 5.
- m. Retire Mill Creek Unit 1 and Unit 2, Brown Unit 3, Haefling Unit 1 and Unit 2, and Paddy's Run Unit 12; Add Mill Creek 5, and Owned Solar.

- n. Retire Mill Creek Unit 1 and Unit 2, Brown Unit 3, Haefling Unit 1 and Unit 2, and Paddy's Run Unit 12; Add Mill Creek 5, Owned Solar, and Solar PPAs.
- o. Retire Mill Creek Unit 1 and Unit 2, Brown Unit 3, Haefling Unit 1 and Unit 2, and Paddy's Run Unit 12; Add Mill Creek 5, Owned Solar, Brown BESS, and Solar PPAs.
- p. Retire Mill Creek Unit 1, Brown Unit 3, Haefling Unit 1 and Unit 2, and Paddy's Run Unit 12; Add Brown Unit 12; Operate Mill Creek Unit 2 and Ghent Unit 2 in Non-Ozone only.
- q. Retire Mill Creek Unit 1, Brown Unit 3, Haefling Unit 1 and Unit 2, and Paddy's Run Unit 12; Add Brown Unit 12, and Owned Solar; Operate Mill Creek Unit 2 and Ghent Unit 2 in Non-Ozone only.
- r. Retire Mill Creek Unit 1, Brown Unit 3, Haefling Unit 1 and Unit 2, and Paddy's Run Unit 12; Add Brown Unit 12, Owned Solar, and Solar PPAs; Operate Mill Creek Unit 2 and Ghent Unit 2 in Non-Ozone only.
- s. Retire Mill Creek Unit 1, Brown Unit 3, Haefling Unit 1 and Unit 2, and Paddy's Run Unit 12; Add Brown Unit 12, Owned Solar, Brown BESS, and Solar PPAs; Operate Mill Creek Unit 2 and Ghent Unit 2 in Non-Ozone only.
- t. Retire Mill Creek Unit 1 and Unit 2, Brown Unit 3, Haefling Unit 1 and Unit 2, and Paddy's Run Unit 12; Add Mill Creek Unit 5, Owned Solar, Brown BESS, and Solar PPAs; Operate Ghent Unit 2 in Non-Ozone only.
- u. Retire Mill Creek Unit 1 and Unit 2, Brown Unit 3, Haefling Unit 1 and Unit 2, and Paddy's Run Unit 12; Add Brown Unit 12, Owned Solar, Brown BESS, and Solar PPAs; Operate Ghent Unit 2 in Non-Ozone only.

21. Refer to the May 10, 2023 Direct Testimony of Stuart A. Wilson (Wilson May 10, 2023 Direct Testimony), Exhibit SB4-1, Table 8: Incremental PVRR (\$M) (Table 8).

a. Provide a table with the actual PVRRs used to calculate the incremental PVRRs reflected in Table 8 for each portfolio and scenario listed therein.

b. Using all of the same assumptions used to calculate the PVRRs in Table 8, unless a cost would be included twice (e.g. duplicate costs included in Mill Creek Unit 2 and Mill Creek Unit 5), provide PVRRs in each scenario listed in Table 8 for each of the following portfolios (do not include the “Add DSM,” as that term is used in Table 8, in any portfolio):

(1) No Retirements, as that term is used in Table 8; Add Owned Solar.

(2) No Retirements, as that term is used in Table 8; Add Solar PPAs.

(3) Each of the portfolios listed in Item 20 of these Post-Hearing Requests for Information.

22. Refer to the Wilson August 24, 2023 Hearing Testimony. Refer to LG&E/KU’s response to Commission Staff’s Fifth Request for Information (Staff’s Fifth Request), Item 2, Table 2: PVRR Delta from Best, 50% NGCC CF Limit.

a. Provide the LOLEs for Portfolios 1 through 7 in Table 2 with Brown Unit 12 and Mill Creek Unit 5 limited to a 50% capacity factor.

b. Provide a version of Table 2 in which the only change is that Brown Unit 12 and Mill Creek 5 have a 20 year useful life.

23. Refer to the Wilson August 24, 2023 Hearing Testimony regarding the expected capacity factor for Mill Creek Unit 5 and Brown Unit 12 without the 50 percent capacity factor limit. Refer to LG&E/KU's response to Staff's Fifth Request, Item 2, Table 1: PVRR Delta from Best, No NGCC CF Limit, Table 2: PVRR Delta from Best, 50% NGCC CF Limit.

a. Provide the capacity factor for Mill Creek Unit 5 and Brown Unit 12 that arose from each fuel price scenario modeled in Table 1 of LG&E/KU's response to Staff's Fifth Request, Item 2 assuming no 50 percent capacity factor limit.

b. Provide the capacity factor limit at which Portfolio 1 in Table 2 of LG&E/KU's response to Staff's Fifth Request, Item 2 is no longer economic in each fuel price scenario.

24. Refer to the Wilson August 24, 2023 Hearing Testimony. Refer to LG&E/KU's response to Commission Staff's Sixth Request for Information (Staff's Sixth Request), Item 2.

a. Explain in more detail how NGCC units with carbon capture and sequestration (CCS) were treated in the original response to this request, including specifically how carbon costs were assigned to the units.

b. Re-run the capacity expansion model conducted in response to Staff's Sixth Request, Item 2 using a 20 year useful life for new NGCC units without CCS but otherwise using the same assumptions. Using the optimal portfolio from the capacity expansion, provide the Selected Portfolio, Incremental PVRR, LOLE, Reserve Margin, Net Summer/Winter Capacity, and Dispatchable Summer/Winter Range.

c. Re-run the capacity expansion model conducted in response to Staff's Sixth Request, Item 2 using a 20 year useful life for all new gas units without CCS but otherwise using the same assumptions. Using the optimal portfolio from the capacity expansion, provide the Selected Portfolio, Incremental PVRR, LOLE, Reserve Margin, Net Summer/Winter Capacity, and Dispatchable Summer/Winter Range.

25. Refer to the Wilson August 24, 2023 Hearing Testimony. Also refer to the Rebuttal Testimony of David Sinclair (Sinclair Rebuttal Testimony) at Page 80. Provide a version of the table on Page 80 of the Sinclair Rebuttal Testimony showing dates in which MW/h Lost is one standard deviation above the average and at least 20 percent of the MW/h Lost is attributable to forced outages.

26. Refer to the August 24, 2023 hearing testimony of Charles R. Schram (Schram August 24, 2023 Hearing Testimony). Also refer to LG&E/KU's response to Staff's First Request, Item 69. Provide a copy of LG&E/KU's communication with June 2022 request for proposal (RFP) respondents to update their proposals to reflect federal incentives that resulted from the Inflation Reduction Act (IRA).

27. Refer to the Schram August 24, 2023 Hearing Testimony. State whether LG&E/KU specifically inputs ambient derates into GADS.

28. Refer to the Schram August 24, 2023 Hearing Testimony. State whether LG&E/KU's Power Supply Commodity Policy – Natural Gas Fuel for Generation: Operating Policy for the Power Supply Group, effective January 1, 2020, is still in effective and, if not, provide a copy of the policy currently in effect.

29. Refer to the Schram August 24, 2023 Hearing Testimony. Provide the median time that customers lost service during Winter Storm Elliot.

30. Refer to LG&E/KU's response to KCA's Third Request for Information, Item 29. Provide a version of the table provided therein that includes the annual changes through the year used to determine the Full Analysis Period PVR.

31. Provide an estimated construction timeline for an SCR at Ghent Unit 2, and explain each basis for the assumptions in the timeline.

  
Linda C. Bridwell, PE  
Executive Director  
Public Service Commission  
P.O. Box 615  
Frankfort, KY 40602

DATED SEP 01 2023

cc: Parties of Record

\*Angela M Goad  
Assistant Attorney General  
Office of the Attorney General Office of Rate  
700 Capitol Avenue  
Suite 20  
Frankfort, KENTUCKY 40601-8204

\*Honorable David J. Barberie  
Managing Attorney  
Lexington-Fayette Urban County Government  
Department Of Law  
200 East Main Street  
Lexington, KENTUCKY 40507

\*Joe F. Childers  
Childers & Baxter PLLC  
300 Lexington Building, 201 West Sho  
Lexington, KENTUCKY 40507

\*Ashley Wilmes  
Kentucky Resources Council, Inc.  
Post Office Box 1070  
Frankfort, KENTUCKY 40602

\*Dennis G Howard II  
Howard Law PLLC  
740 Emmett Creek Lane  
Lexington, KENTUCKY 40515

\*John G Horne, II  
Office of the Attorney General Office of Rate  
700 Capitol Avenue  
Suite 20  
Frankfort, KENTUCKY 40601-8204

\*Honorable Allyson K Sturgeon  
Managing Senior Counsel - Regulatory &  
LG&E and KU Energy LLC  
220 West Main Street  
Louisville, KENTUCKY 40202

\*Tom Fitzgerald  
Kentucky Resources Council, Inc.  
Post Office Box 1070  
Frankfort, KENTUCKY 40602

\*Joshua Smith  
Sierra Club  
2101  
Webster St. , Suite 1300  
Oakland, CALIFORNIA 94612

\*William H May, III  
Hurt, Deckard & May  
The Equus Building  
127 West Main Street  
Lexington, KENTUCKY 40507

\*Glibert Zelaya  
Earthjustice 156 William Street, Suite 800  
New York, NEW YORK 10038

\*Kate Huddleston  
Sierra Club Environmental Law Program  
2101 Webster Street  
Suite 1300  
Oakland, CALIFORNIA 94612

\*Byron Gary  
Kentucky Resources Council, Inc.  
Post Office Box 1070  
Frankfort, KENTUCKY 40602

\*James W Gardner  
Sturgill, Turner, Barker & Moloney, PLLC  
333 West Vine Street  
Suite 1400  
Lexington, KENTUCKY 40507

\*Honorable Kurt J Boehm  
Attorney at Law  
Boehm, Kurtz & Lowry  
36 East Seventh Street  
Suite 1510  
Cincinnati, OHIO 45202

\*Carrie H Grundmann  
Spilman Thomas & Battle, PLLC  
110 Oakwood Drive, Suite 500  
Winston-Salem, NORTH CAROLINA 27103

\*Jody Kyler Cohn  
Boehm, Kurtz & Lowry  
36 East Seventh Street  
Suite 1510  
Cincinnati, OHIO 45202

\*Honorable Kendrick R Riggs  
Attorney at Law  
Stoll Keenon Ogden, PLLC  
2000 PNC Plaza  
500 W Jefferson Street  
Louisville, KENTUCKY 40202-2828

\*Cassandra McCrae  
Earthjustice  
1617 JFK Boulevard, Suite 1675  
Philadelphia, PENNSYLVANIA 19103

\*Jody M Kyler Cohn  
Boehm, Kurtz & Lowry  
36 East Seventh Street  
Suite 1510  
Cincinnati, OHIO 45202

\*Larry Cook  
Assistant Attorney General  
Office of the Attorney General Office of Rate  
700 Capitol Avenue  
Suite 20  
Frankfort, KENTUCKY 40601-8204

\*J. Michael West  
Office of the Attorney General Office of Rate  
700 Capitol Avenue  
Suite 20  
Frankfort, KENTUCKY 40601-8204

\*Rebecca C. Price  
Sturgill, Turner, Barker & Moloney  
155 East Main Street  
Lexington, KENTUCKY 40507

\*M. Todd Osterloh  
Sturgill, Turner, Barker & Moloney, PLLC  
333 West Vine Street  
Suite 1400  
Lexington, KENTUCKY 40507

\*Honorable Michael L Kurtz  
Attorney at Law  
Boehm, Kurtz & Lowry  
36 East Seventh Street  
Suite 1510  
Cincinnati, OHIO 45202

\*Steven W Lee  
Spilman Thomas & Battle, PLLC  
1100 Brent Creek Blvd., Suite 101  
Mechanicsburg, PENNSYLVANIA 17050

\*Honorable Matthew R Malone  
Attorney at Law  
Hurt, Deckard & May  
The Equus Building  
127 West Main Street  
Lexington, KENTUCKY 40507

\*Susan Speckert  
Lexington-Fayette Urban County Government  
Department Of Law  
200 East Main Street  
Lexington, KENTUCKY 40507

\*Megan W. Mullins  
Spilman Thomas & Battle, PLLC  
300 Kanawha Blvd, East  
Charleston, WEST VIRGINIA 25301

\*Kentucky Utilities Company  
220 W. Main Street  
P. O. Box 32010  
Louisville, KY 40232-2010

\*Quang Nguyen  
Assistant County Attorney  
Louisville/Jefferson County Metro Government  
First Trust Centre  
200 South 5th Street, Suite 300N  
Louisville, KENTUCKY 40202

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

\*Rick LoveKamp  
Kentucky Utilities Company  
220 W. Main Street  
P. O. Box 32010  
Louisville, KY 40202

\*Sara Judd  
Senior Corporate Attorney  
LG&E and KU Energy LLC  
220 West Main Street  
Louisville, KENTUCKY 40202

\*Robert Conroy  
Vice President, State Regulation and Rates  
LG&E and KU Energy LLC  
220 West Main Street  
Louisville, KENTUCKY 40202

\*Thomas Cmar  
Earthjustice  
6608 Wooster Pike  
Cincinnati, OHIO 45227