#### COMMONWEALTH OF KENTUCKY

#### BEFORE THE PUBLIC SERVICE COMMISSION

#### In the Matter of:

AN EXAMINATION BY THE PUBLIC SERVICE	)	
COMMISSION OF THE ENVIRONMENTAL	)	
SURCHARGE MECHANISM OF KENTUCKY	)	CASE NO.
UTILITIES COMPANY FOR THE SIX-MONTH	)	2013-00436
BILLING PERIOD ENDING OCTOBER 31, 2013	)	

# RESPONSE OF KENTUCKY UTILITIES COMPANY TO COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION IN

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION IN APPENDIX B OF COMMISSION'S ORDER DATED DECEMBER 23, 2013

FILED: January 23, 2014

#### **VERIFICATION**

COMMONWEALTH OF KENTUCKY	)	
	)	SS:
COUNTY OF JEFFERSON	)	

The undersigned, **Robert M. Conroy**, being duly sworn, deposes and says that he is Director - Rates for LG&E and KU Services Company, and that he has personal knowledge of the matters set forth in the responses for which he is identified as the witness, and the answers contained therein are true and correct to the best of his information, knowledge and belief.

Robert M. Conroy

Susen M. Walker (SEAL)

My Commission Expires:

SUSAN M. WATKINS

Notary Public, State at Large, KY
My Commission Expires Mar. 19, 2017
Notary ID # 485723

#### **VERIFICATION**

COMMONWEALTH OF KENTUCKY	)	
	)	SS:
COUNTY OF JEFFERSON	)	

The undersigned, **Christopher M. Garrett**, being duly sworn, deposes and says that he is Director – Accounting and Regulatory Reporting for LG&E and KU Services Company, and that he has personal knowledge of the matters set forth in the responses for which he is identified as the witness, and the answers contained therein are true and correct to the best of his information, knowledge and belief.

Christopher M. Garrett

Notary Public

My Commission Expires:

SUSAN M. WATKINS Notary Public, State at Large, KY My Commission Expires Mar. 19, 2017 Notary ID # 485723

### Response to Commission Staff's First Request for Information in Appendix B of Commission's Order Dated December 23, 2013

Case No. 2013-00436

#### Question No. 1

Witness: Robert M. Conroy / Christopher M. Garrett

- Q-1. Concerning the rate of return on the two amendments to the environmental compliance plan, for the period under review, calculate any true-up adjustment needed to recognize changes in KU's cost of debt, preferred stock, accounts receivable financing (if applicable), or changes in KU's jurisdictional capital structure. Include all assumptions and other supporting documentation used to make this calculation. Any true-up adjustment is to be included in the determination of the over- or under-recovery of the surcharge for the corresponding billing period under review. Provide all exhibits and schedules of your response in Excel spreadsheet format, with formulas intact and unprotected and all rows and columns accessible.
- A-1. Please see the attachment being provided in Excel format.

KU calculated the true-up adjustment to recognize changes in the cost of debt and capital structure in two steps, shown on Pages 1 and 2 of the attachment to this response. Page 1 reflects the true-up required due to the changes between the Rate Base as filed and the Rate Base as Revised through the Monthly Filings. However, during the period under review there were no revisions to reflect. Page 2 represents the true-up in the Rate of Return as filed compared to the actual Rate of Return calculations, which impacted the true-up adjustment for the period under review in this case. No further revisions to Rate Base were identified in preparation of this response.

Page 3 provides the adjusted weighted average cost of capital for the billing period under review ending October 31, 2013. The Commission approved a single rate of return for all Plans in Case No. 2012-00221; therefore, the Pre-2011 and 2011 Plans are no longer shown separately. KU calculated the short- and long-term debt rates using average daily balances and daily interest rates pursuant to the Commission's Order in Case No. 2011-00161.

KU did not engage in accounts receivable financing or have any preferred stock outstanding during the period under review.

#### Kentucky Utilities Company Overall Rate of Return True-up Adjustment - Revised Rate Base Impact on Calculated E(m)

Attachment to Response to Question No. 1
Page 1 of 3
Conroy

(1)	(2)	(3)		(4)		(5)		(6)		(7)	(8)		(9)
Billing Month	Expense Month	Rate of Return as Filed	Ra	te Base as Filed	Rat	te Base As Revised	C	hange in Rate Base	True-up	o Adjustment	Jurisdictional Allocation, ES Form 1.10	Jui	risdictional True up Adjustment
								(5) - (4)	(3)	* (6) / 12			(7) * (8)
May-13	Mar-13	10.26%	\$	466,605,240	\$	466,605,240	\$	-	\$	-	87.29%	\$	-
Jun-13	Apr-13	10.30%		488,353,534		488,353,534		-		-	88.61%		-
Jul-13	May-13	10.30%		500,727,214		500,727,214		-		-	86.28%		-
Aug-13	Jun-13	10.30%		522,490,759		522,490,759		-		-	87.29%		-
Sep-13	Jul-13	10.30%		545,861,106		545,861,106		-		-	88.29%		-
0-4-12	Aug-13	10.30%		565,466,957		565,466,957		_		-	87.53%		-
Oct-13													

#### Kentucky Utilities Company Overall Rate of Return True-up Adjustment - Revised Rate of Return Impact on Calculated E(m)

Attachment to Response to Question No. 1
Page 2 of 3
Conroy

(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
Billing Month	Expense Month	Rate of Return as Filed	Rate of Return as Revised	Change in Rate of Return	Rate Base as Revised	d True-up Adjustment	Jurisdictional Allocation, ES Form 1.10	Jurisdictional True up Adjustment
				(4) - (3)		(5) * (6) / 12		(7) * (8)
May-13	Mar-13	10.26%	10.25%	-0.01%	\$ 466,605,240	(3,888)	87.29%	\$ (3,394
Jun-13	Apr-13	10.30%	10.25%	-0.05%	488,353,534	(20,348)	88.61%	(18,030
Jul-13	May-13	10.30%	10.25%	-0.05%	500,727,214	(20,864)	86.28%	(18,001
Aug-13	Jun-13	10.30%	10.25%	-0.05%	522,490,759	(21,770)	87.29%	(19,003)
Sep-13	Jul-13	10.30%	10.25%	-0.05%	545,861,106	(22,744)	88.29%	(20,081)
Oct-13	Aug-13	10.30%	10.25%	-0.05%	565,466,957	(23,561)	87.53%	(20,623)
	_					(113,176)		(99,133)
Im	pact of Chai	nge in Rate of Ret	urn during the six-mo	onth billing period er	nding October 31, 201	3 \$ (113,176)		\$ (99,133

#### KENTUCKY UTILITIES

### Adjusted Electric Rate of Return on Common Equity <u>As of October 31, 2013</u>

		Balance at 10-31-13 (1)	Capital Structure (2)		EEI (3)	OVI	vestments in EC and Other (2 x Col 4 Line 4) (4)	Adjustments to Total Co. Capitalization (Sum of Col 3 - Col 4)		Adjusted Total Company Capitalization (Col 1 + Col 5) (6)	Jurisdictional Rate Base Percentage (7)		Kentucky Jurisdictional Capitalization (Col 6 x Col 7) (8)
1.	Short Term Debt	\$ 136,218,209 (a)	3.13%	\$	-	\$	(38,240)	\$ (38,240)	\$	136,179,969	87.63%	\$	119,334,507
2.	Long Term Debt	1,841,623,843 (a)	42.35%		-		(517,398)	(517,398)		1,841,106,445	87.63%		1,613,361,578
3.	Common Equity	2,370,331,639	54.52%		(504,066)		(666,082)	(1,170,148)		2,369,161,491	87.63%		2,076,096,215
4.	Total Capitalization	\$ 4,348,173,691	100.000%	\$	(504,066)	\$	(1,221,720)	\$ (1,725,786)	\$	4,346,447,905		\$	3,808,792,300
		Kentucky Jurisdictional Capitalization (8)	Capital Structure (9)		Environmental Surcharge (Col 9 x Col 10 Line 4) (10)		DSM Rate Base 9 x Col 11 Line 4) (11)	Adjusted Kentucky Jurisdictional Capitalization tol 8 + Col 10 + Col 11) (12)		Adjusted Capital Structure (13)	Annual Cost Rate (14)		Cost of Capital (Col 13 x Col 14) (15)
1.	Short Term Debt	\$ 119,334,507	3.13%	\$	(17,082,451)	\$	(62,377)	\$ 102,189,679		3.13%	0.32%		0.01%
2.	Long Term Debt	1,613,361,578	42.36%		(231,186,140)		(844,178)	1,381,331,260		42.36%	3.65%		1.55%
3.	Common Equity	2,076,096,215	54.51%		(297,496,613)		(1,086,311)	1,777,513,291		54.51%	10.25%		5.59%
4.	Total Capitalization	\$ 3,808,792,300	100.000%	\$	(545,765,204)	\$	(1,992,866)	\$ 3,261,034,230	_	100.000%		_	7.15%
5.	Weighted Cost of Capital Grossed up f	For Income Tax Effect {ROR + (	ROR - DR) x [TR /	(1 - TR)	]}								10.25%

<sup>(</sup>a) Average daily balance per Settlement Agreement in Case No. 2011-00161.

### Response to Commission Staff's First Request for Information in Appendix B of Commission's Order Dated December 23, 2013

Case No. 2013-00436

**Question No. 2** 

Witness: Robert M. Conroy

- Q-2. Prepare a summary schedule showing the calculation of Total E(m), Net Retail E(m), and the surcharge factor for the expense months covered by the applicable billing period. Include the expense months for the two expense months subsequent to the billing period in order to show the over- and under-recovery adjustments for the months included for the billing period under review. The summary schedule is to incorporate all corrections and revisions to the monthly surcharge filings KU has submitted during the billing period under review. Include a calculation of any additional over- or under-recovery amount KU believes needs to be recognized for the six-month review. Include all supporting calculations and documentation for any such additional over- or under-recovery. Provide all exhibits and schedules of your response in Excel spreadsheet format, with formulas intact and unprotected and all rows and columns accessible.
- A-2. Please see the attachment being provided in Excel format for the summary schedule and components that make up the over-recovery.

For the period under review, KU experienced an over-recovery of \$347,028.

#### Kentucky Utilities Company Calculation of E(m) and Jurisdictional Surcharge Billing Factor Summary Schedule for Expense Months March 2013 through August 2013

Attachment to Response to Question No. 2
Page 1 of 3
Conroy

Expense   Rate Base as   Monthly Rate Base as   Monthly Rate Base as   Return as   Month   Revised   Revised   Revised   Revised   Revised   Proceeds   Total E(m)   Allocation   Month   Revised   Section 1   Section 1   Section 1   Section 1   Section 2   Section 2   Section 3   Section 3	
Mar-13 \$ 466,605,240 \$ 38,883,770 10.25% \$ 1,534,382 \$ 5,519,968 87.29% Apr-13 488,353,534 40,696,128 10.25% 1,482,877 5,654,230 88.61%	. ,
Apr-13 488,353,534 40,696,128 10.25% 1,482,877 5,654,230 88.61%	
•	
$1710y^{-1}3$ $300,727,217$ $71,727,200$ $10.23/0$ $1,3/4,123$ $3,031,100$ $00.20/0$	% 5,048,388
Jun-13 522,490,759 43,540,897 10.25% 1,282,021 5,744,963 87.29%	% 5,014,778
Jul-13 545,861,106 45,488,426 10.25% 1,328,577 5,991,141 88.29%	% 5,289,578
Aug-13 565,466,957 47,122,246 10.25% 1,293,263 6,123,293 87.53%	% 5,359,719

#### Kentucky Utilities Company Calculation of E(m) and Jurisdictional Surcharge Billing Factor Summary Schedule for Expense Months March 2013 through August 2013

Attachment to Response to Question No. 2
Page 2 of 3
Conroy

(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)		
Expense Month	Retail E(m) for All ECR Plans	Adjustment to Retail E(m) for (Over)/Under- Collection	Retail E(m) Including all Adjustments to be billed as ECR	Monthly Billing Factor (Group 1)	Monthly Billing Factor (Group 2)	ECR Revenue Recovered Through Base Rates	Billing Period	ECR Billing Factor Revenues (Group 1)	ECR Billing Factor Revenues (Group 2)	Combined Total Over/(Under) Recovery		
	Page 1 Col (8)	Case No. 2012-546	(2) + (3)	As Filed	As Filed	As Filed		As Filed	As Filed	(7) + (9) + (10) - (4)		
Mar-13	\$ 4,818,380	\$ -	\$ 4,818,380	4.02%	6.97%	\$ 438,490	May-13	\$ 1,386,055	\$ 2,584,995	\$ (408,841)		
Apr-13	5,010,213	(218,511)	4,791,702	3.96%	6.86%	423,362	Jun-13	1,602,385	2,753,864	(12,091)		
May-13	5,048,388	-	5,048,388	4.24%	7.36%	355,318	Jul-13	2,047,689	3,053,535	408,154		
Jun-13	5,014,778	-	5,014,778	4.17%	7.25%	390,332	Aug-13	1,911,882	3,065,470	352,907		
Jul-13	5,289,578	-	5,289,578	4.39%	7.65%	431,471	Sep-13	2,050,794	3,160,751	353,438		
Aug-13	5,359,719	_	5,359,719	4.47%	7.78%	421,674	Oct-13	1,601,933	2,989,573	(346,538)		
		•	\$ 30,322,546	_'		\$ 2,460,647		\$ 10,600,739	\$ 17,608,188	\$ 347,028		
	Over-Recovery to be returned to customers for the 6-month billing period ending October 31, 2013 \$ 347,028											

#### Kentucky Utilities Company Reconciliation of Combined Over/(Under) Recovery Summary Schedule for Expense Months March 2013 through August 2013

(1)	(2)	(3)	(4)	(5)		(6)	(7)	(8)	(9)
								Jurisdictional	Jurisdictional
Billing		Rate of Return as	Rate of Return as	Change in Rate		Rate Base as	Impact of change	Allocation,	Impact
Month	Expense Month	Filed	Revised	of Return		Revised	in Rate of Return	ES Form 1.10	(Over)/Under
				(4) - (3)			(5) * (6) / 12		(7) * (8)
May-13	Mar-13	10.26%	10.25%	-0.01%	\$	466,605,240	(3,888)	87.29%	(3,394)
Jun-13	Apr-13	10.30%	10.25%	-0.05%		488,353,534	(20,348)	88.61%	(18,030)
Jul-13	May-13	10.30%	10.25%	-0.05%		500,727,214	(20,864)	86.28%	(18,001)
Aug-13	Jun-13	10.30%	10.25%	-0.05%		522,490,759	(21,770)	87.29%	(19,003)
Sep-13	Jul-13	10.30%	10.25%	-0.05%		545,861,106	(22,744)	88.29%	(20,081)
Oct-13	Aug-13	10.30%	10.25%	-0.05%		565,466,957	(23,561)	87.53%	(20,623)
		Impact	of Changes in Rate	of Return during	neri	iod under review	\$ (113,176)		\$ (99,133)
		impact	or changes in raice	or rectain daning	, P-1.	iou under review	Ψ (115,170)		Ψ (//,155)

(1)	(2)		(3)		(4)	(5)		
		R	ecovery Posit	ion Ex	planation -	Over	/(Under)	
Billing Month	Expense Month	Combined Total Over/(Under) Recovery (Q2, pg 2, Col 11)			of Return rue-up	Use of 12 Month Average Revenues		
May-13	Mar-13	\$	(408,841)	\$	3,394	\$	(412,235)	
Jun-13	Apr-13		(12,091)		18,030		(30,122)	
Jul-13	May-13		408,154		18,001		390,153	
Aug-13	Jun-13		352,907		19,003		333,903	
Sep-13	Jul-13		353,438		20,081		333,357	
Oct-13	Aug-13		(346,538)		20,623		(367,162)	
Total Over-	Recovery for							
6-month billing period		\$	347,028	\$	99,133	\$	247,895	

OVER/(UNDER) RECONCILIATION	
Combined Over/(Under) Recovery	\$ 347,028
Due to Change in ROR \$ 99,133 Use of 12 Month Average Revenues 247,895	
Subtotal	 347,028
Unreconciled Difference	\$ -

### Response to Commission Staff's First Request for Information in Appendix B of Commission's Order Dated December 23, 2013

Case No. 2013-00436

#### **Question No. 3**

Witness: Christopher M. Garrett

- Q-3. Provide the calculations, assumptions, workpapers, and other supporting documents used to determine the amounts KU has reported during each billing period under review for Pollution Control Deferred Income Taxes. Provide all exhibits and schedules of your response in Excel spreadsheet format, with formulas intact and unprotected and all rows and columns accessible.
- A-3. KU calculates Deferred Income Taxes as the taxable portion of the difference between book depreciation, using straight line depreciation, and tax depreciation, generally using 20 year MACRS accelerated depreciation, bonus depreciation or 5 or 7 year rapid amortization. Accelerated depreciation results in a temporary tax savings to the Company and the Accumulated Deferred Tax balance reflects the value of those temporary savings as a reduction to environmental rate base.

Please see the attachment being provided in Excel format for the calculation of Deferred Income Taxes and the balance of Accumulated Deferred Income Taxes reported each month of the period under review.

2009 - Plan Project 28 - Brown 3 SCR

Month	Plant Balance	Book Depreciation	Tax Depreciation	Temporary Difference	Income Tax Rate	Deferred Tax	Accumulated Deferred Taxes	Deferred Taxes on Retirements
Beg Balance		-					16,993,413	
Mar-13	91,793,424	179,762	593,165	413,403	38.9000%	160,814	17,154,227	-
Apr-13	91,793,424	179,762	593,164	413,402	38.9000%	160,813	17,315,040	-
May-13	91,793,424	179,762	593,164	413,402	38.9000%	160,813	17,475,854	-
Jun-13	91,793,424	179,762	593,164	413,402	38.9000%	160,813	17,636,667	-
Jul-13	91,793,424	179,762	593,168	413,406	38.9000%	160,815	17,797,481	-
Aug-13	91,793,424	179,762	593,167	413,405	38.9000%	160,815	17,958,294	-

Due to Bonus Depreciation for tax purposes taken on certain components of Project 28, the deferred tax calculation for this project is computed separately for Federal and State purposes. Specifically, for Federal taxes, certain assets received 50% bonus depreciation, which reduces the Federal tax basis to 50% of the plant balance. A sample calculation of deferred taxes for Mar 2013 is shown below:

Federal Basis	Book Depr.	Federal Tax Dep	Fed. Difference	Fed Tax Rate	Fed Def Tax
45,896,712	179,762	532,251	352,489	35.0000%	123,371
45,896,712		-	-	35.0000%	-
State Basis	Book Depr.	State Tax Depr	St. Difference	State Tax Rate	St Def Tax
91,793,424	179,762	1,139,838	960,076	6.0000%	57,605

St. Offset for Fed Taxes not Owed (20,162)

Total Deferred Tax 160,814

#### 2009 - Plan Project 29 - ATB Expansion at E.W. Brown Station (Phase II)

Month	Plant Balance	Book Depreciation	Tax Depreciation	Temporary Difference	Income Tax Rate	Deferred Tax	Accumulated Deferred Taxes	Deferred Taxes on Retirements
Beg Balance							861,626	
Mar-13	16,622,587	22,343	704,140	681,797	38.9000%	265,219	1,126,844	-
Apr-13	16,622,587	22,343	703,623	681,280	38.9000%	265,018	1,391,862	-
May-13	16,622,587	22,343	703,625	681,282	38.9000%	265,019	1,656,880	-
Jun-13	16,622,587	22,343	703,623	681,280	38.9000%	265,018	1,921,898	-
Jul-13	16,622,587	22,343	703,627	681,284	38.9000%	265,019	2,186,916	-
Aug-13	16,622,587	22,343	703,626	681,283	38.9000%	265,019	2,451,934	-

Due to Bonus Depreciation for tax purposes taken on certain components of Project 29, the deferred tax calculation for this project is computed separately for Federal and State purposes. Specifically, for Federal taxes, certain assets received 50% bonus depreciation, which reduces the Federal tax basis to 50% of the plant balance. A sample calculation of deferred taxes for Aug 2013 is shown below:

Federal Basis	Book Depr.	Federal Tax Dep	Fed. Difference	Fed Tax Rate	Fed Def Tax	
8,311,293	22,343	66,520	44,177	35.0000%	15,462	
8,311,293		692,608	692,608	35.0000%	242,413	
State Basis	Book Depr.	State Tax Depr	St. Difference	State Tax Rate	St Def Tax	
16,622,587	22,343	205,504	183,161	6.0000%	10,990	

St. Offset for Fed Taxes not Owed (3,846)

Total Deferred Tax 265,018

2009 - Plan Project 30 - Ghent CCP Storage (Landfill-Phase I)

		Book	Tax	Temporary	Income Tax		Accumulated	Deferred Taxes on
Month	Plant Balance	Depreciation	Depreciation	Difference	Rate	Deferred Tax	<b>Deferred Taxes</b>	Retirements
Beg Balance							435	
Mar-13	34,137	406	1,506	1,100	38.9000%	428	862	-
Apr-13	34,137	406	2,257	1,851	38.9000%	720	1,581	-
May-13	2,335,800	2,622	133,293	130,671	38.9000%	50,831	52,411	-
Jun-13	2,335,800	4,837	135,284	130,447	38.9000%	50,744	103,154	-
Jul-13	2,335,800	4,837	135,284	130,447	38.9000%	50,744	153,897	-
Aug-13	2,335,800	4,837	135,284	130,447	38.9000%	50,744	204,640	-

Due to Bonus Depreciation for tax purposes taken on certain components of Project 30, the deferred tax calculation for this project is computed separately for Federal and State purposes. Specifically, for Federal taxes, certain assets received 50% bonus depreciation, which reduces the Federal tax basis to 50% of the plant balance. A sample calculation of deferred taxes for Aug 2013 is shown below:

Federal Basis	Book Depr.	Federal Tax Dep	Fed. Difference	Fed Tax Rate	Fed Def Tax
1,167,900	4,837	1,994	(2,843)	35.0000%	(995)
1,167,900		145,988	145,988	35.0000%	51,096
State Basis	Book Depr.	State Tax Depr	St. Difference	State Tax Rate	St Def Tax
2,335,800	4,837	21,377	16,540	6.0000%	992

St. Offset for Fed Taxes not Owed (347)

Total Deferred Tax 50,746

<u>2009 - Plan</u> Project 31 - Trimble County Ash Treatment Basin (BAP/GSP)

Month	Plant Balance	Book Depreciation	Tax Depreciation	Temporary Difference	Income Tax Rate	Deferred Tax	Accumulated Deferred Taxes	Deferred Taxes on Retirements
Beg Balance							322,320	
Mar-13	9,102,469	14,253	50,656	36,403	38.9000%	14,161	336,480	-
Apr-13	9,102,469	14,253	50,656	36,403	38.9000%	14,161	350,641	-
May-13	9,102,469	14,253	50,658	36,405	38.9000%	14,162	364,801	-
Jun-13	9,102,469	14,253	50,656	36,403	38.9000%	14,161	378,962	-
Jul-13	9,102,469	14,253	50,656	36,403	38.9000%	14,161	393,122	-
Aug-13	9,102,469	14,253	50,660	36,407	38.9000%	14,162	407,283	-

2009 - Plan Project 33 - Beneficial Reuse

Month	Plant Balance	Book Depreciation	Tax Depreciation	Temporary Difference	Income Tax Rate	Deferred Tax	Accumulated Deferred Taxes	Deferred Taxes on Retirements
Beg Balance							785,464	
Mar-13	4,279,420	7,489	14,163	6,674	38.9000%	2,596	788,060	-
Apr-13	4,279,420	7,489	14,163	6,674	38.9000%	2,596	790,656	-
May-13	4,279,420	7,489	14,161	6,672	38.9000%	2,595	793,252	-
Jun-13	4,279,420	7,489	14,165	6,676	38.9000%	2,597	795,849	-
Jul-13	4,279,420	7,489	14,165	6,676	38.9000%	2,597	798,445	-
Aug-13	4,279,420	7,489	14,165	6,676	38.9000%	2,597	801,041	-

Due to Bonus Depreciation for tax purposes taken on certain components of Project 33, the deferred tax calculation for this project is computed separately for Federal and State purposes. Specifically, for Federal taxes, certain assets received 50% bonus depreciation, which reduces the Federal tax basis to 50% of the plant balance. A sample calculation of deferred taxes for Mar 2013 is shown below:

Federal Basis	Book Depr.	Federal Tax Dep	Fed. Differenc	Fed Tax Rate	Fed Def Tax
2,139,710	7,489	12,872	5,383	35.0000%	1,884
2,139,710		-	-	35.0000%	-
State Basis	Book Depr.	State Tax Depr	St. Difference	State Tax Rate	St Def Tax
4,279,420	7,489	25,744	18,255	6.0000%	1,095

St. Offset for Fed Taxes not Owed

(383)

Total Deferred Tax 2,596

#### 2011 - Plan Project 35 - Ghent Station Air Compliance

		Book	Tax	Temporary	Income Tax		Accumulated	Deferred Taxes on
Month	Plant Balance	Depreciation	Depreciation	Difference	Rate	Deferred Tax	Deferred Taxes	Retirements
Beg Balance							1,253,783	
Mar-13	3,645,863	7,026	2,201	(4,825)	38.9000%	(1,877)	1,251,906	-
Apr-13	12,079,086	12,156	456,058	443,902	38.9000%	172,678	1,424,584	-
May-13	12,079,086	17,286	463,571	446,285	38.9000%	173,605	1,598,189	-
Jun-13	12,079,086	17,286	463,571	446,285	38.9000%	173,605	1,771,794	-
Jul-13	11,376,711	16,902	407,504	390,602	38.9000%	151,944	1,923,738	949
Aug-13	12,184,254	17,009	483,891	466,882	38.9000%	181,617	2,105,354	949

Due to Bonus Depreciation for tax purposes taken on certain components of Project 35, the deferred tax calculation for this project is computed separately for Federal and State purposes. Specifically, for Federal taxes, certain assets received 100% bonus depreciation, which reduces the Federal tax basis to 100% of the plant balance. A sample calculation of deferred taxes for Mar 2013 is shown below:

Federal Basis	Book Depr.	Federal Tax Dep	Fed. Difference	Fed Tax Rate	Fed Def Tax
3,645,863	7,026	-	(7,026)	35.0000%	(2,459)
State Basis	Book Depr.	State Tax Depr	St. Difference	State Tax Rate	St Def Tax
3,645,863	7,026	21,933	14,907	6.0000%	894

St. Offset for Fed Taxes not Owed (313)

Total Deferred Tax (1,878)

### Response to Commission Staff's First Request for Information in Appendix B of Commission's Order Dated December 23, 2013

Case No. 2013-00436

#### **Question No. 4**

Witness: Christopher M. Garrett

- Q-4. Refer to ES Form 2.50, Pollution Control Operations & Maintenance Expenses, for the March 2013 through August 2013 expense months. For each expense account number listed on this schedule, explain the reason(s) for any change in the expense levels from month to month if that change is greater than plus or minus 10 percent.
- A-4. Attached please find a schedule showing the changes in the operations and maintenance expense accounts for March 2013 through August 2013 expense months. The changes in the expense levels are reasonable and generally occurred as a part of routine plant operations and maintenance or normal annual testing expenses.

#### 2009 Plan

Monthly variances in the NOx operation expenses, accounts 506154 and 506155, reflect normal SCR operations at E.W. Brown Unit 3. The variances for account 506154 are driven by the purchase and delivery timing of the raw consumable material (ammonia), as well as variations in generation and coal quality.

Fluctuations in the NOx maintenance expenses, account 512151, are the result of routine monthly maintenance on the SCR at E.W. Brown Unit 3. The decrease in June is due to increased air compressor maintenance in April and May. The increase in August is due to air filter replacement.

#### 2011 Plan

Fluctuations in sorbent injection operation expenses, account 506159, are the result of ongoing operation of Ghent and E.W. Brown Units.

Fluctuations in sorbent injection reactant (hydrated lime/trona) expenses, account 506152, are the result of on-going operation of all Ghent and E.W. Brown Units.

Fluctuations in sorbent injection maintenance expenses, account 512152, are the result of normal system maintenance and the timing of preventive maintenance performed.

#### KENTUCKY UTILITIES COMPANY ENVIRONMENTAL SURCHARGE REPORT

#### **Pollution Control - Operations & Maintenance Expenses**

O&M Expense Account	Mar-13	Apr-13	% Change from Prior Period	May-13	% Change from Prior Period	Jun-13	% Change from Prior Period	Jul-13	% Change from Prior Period	Aug-13	% Change from Prior Period
		-		<u> </u>							
2009 Plan											
506154 - ECR NOx Operation Consumables	31,466.24	62,224.49	98%	75,760.64	22%	60,016.45	-21%	57,653.83	-4%	53,792.47	-7%
506155 - ECR NOx Operation Labor and Other	-	-	0%	-	0%	-	0%	-	0%	-	0%
512151 - ECR NOx Maintenance	14,207.68	22,551.69	59%	20,743.16	-8%	3,094.47	-85%	8,989.73	191%	13,830.81	54%
502013 - ECR Landfill Operations	-	-	0%	-	0%	-	0%	-	0%	-	0%
512107 - ECR Landfill Maintenance	-	-	0%	-	0%	-	0%	-	0%	-	0%
Total 2009 Plan O&M Expenses	45,673.92	84,776.18	86%	96,503.80	14%	63,110.92	-35%	66,643.56	6%	67,623.28	1%
2011 Plan											
506159 - ECR Sorbent Injection Operation	57,544.96	59,974.57	4%	58,381.82	-3%	54,362.92	-7%	61,567.56	13%	62,890.58	2%
506152 - ECR Sorbent Reactant - Reagent Only	1,114,685.97	999,005.78	-10%	1,016,377.75	2%	804,996.28	-21%	831,844.92	3%	814,316.17	-2%
512152 - ECR Sorbent Injection Maintenance	23,546.99	28,404.04	21%	47,345.97	67%	33,808.38	-29%	41,273.12	22%	14,263.29	-65%
506156 - ECR Baghouse Operations	-	-	0%	-	0%	-	0%	-	0%	-	0%
512156 - ECR Baghouse Maintenance	-	-	0%	-	0%	-	0%	-	0%	-	0%
506151 - ECR Activated Carbon	-	-	0%	-	0%	-	0%	-	0%	-	0%
502013 - ECR Landfill Operations	-	-	0%	-	0%	-	0%	_	0%	-	0%
512107 - ECR Landfill Maintenance	-	-	0%	-	0%	-	0%	-	0%	-	0%
Total 2011 Plan O&M Expenses	1,195,777.92	1,087,384.39	-9%	1,122,105.54	3%	893,167.58	-20%	934,685.60	5%	891,470.04	-5%

### Response to Commission Staff's First Request for Information in Appendix B of Commission's Order Dated December 23, 2013

Case No. 2013-00436

#### Question No. 5

Witness: Christopher M. Garrett

- Q-5. In Case No. 2000-00439, the Commission ordered that KU's cost of debt and preferred stock would be reviewed and re-established during the six-month review case. Provide the following information as of August 31, 2013:
  - a. The outstanding balances for long-term debt, short-term debt, preferred stock, and common equity. Provide this information on total company and Kentucky jurisdictional bases.
  - b. The blended interest rates for long-term debt, short-term debt, and preferred stock. Include all supporting calculations showing how these blended interest rates were determined. If applicable, provide the blended interest rates on total company and Kentucky jurisdictional bases. For each outstanding debt listed, indicate whether the interest rate is fixed or variable.
  - c. KU's calculation of its weighted average cost of capital for environmental surcharge purposes.
  - d. Provide all exhibits and schedules of your response in Excel spreadsheet format, with formulas intact and unprotected and all rows and columns accessible.
- A-5. a-d. Please see the attachment being provided in Excel format. There was no preferred stock outstanding as of August 31, 2013; therefore, it is not listed in the attached schedule. KU is utilizing a return on equity of 10.25% as agreed to for all ECR Plans and approved by the Commission in its December 20, 2012 Order in Case No. 2012-00221.

#### KENTUCKY UTILITIES

### Adjusted Electric Rate of Return on Common Equity <u>As of August 31, 2013</u>

		Balance at 08-31-13 (1)	Capital Structure (2)		EEI (3)	OVI	restments in EC and Other 2 x Col 4 Line 4) (4)	(	Adjustments to Total Co. Capitalization Sum of Col 3 - Col 4) (5)		Adjusted Total Company Capitalization (Col 1 + Col 5) (6)	Jurisdictional Rate Base Percentage (7)	Jui Ca	Kentucky risdictional pitalization Col 6 x Col 7) (8)
1.	Short Term Debt	\$ 124,993,822	2.90%	\$	-	\$	(35,430)	\$	(35,430)	\$	124,958,392	87.63%	\$	109,501,039
2.	Long Term Debt	1,841,650,311	42.79%		-		(522,774)		(522,774)		1,841,127,537	87.63%	1	1,613,380,061
3.	Common Equity	2,336,831,556	54.31%		(504,066)		(663,516)		(1,167,582)		2,335,663,974	87.63%	2	2,046,742,340
4.	Total Capitalization	\$ 4,303,475,689	100.000%	\$	(504,066)	\$	(1,221,720)	\$	(1,725,786)	\$	4,301,749,903		\$ 3	3,769,623,440
		Kentucky Jurisdictional Capitalization (8)	Capital Structure (9)		Environmental Surcharge (Col 9 x Col 10 Line 4) (10)		DSM Rate Base 9 x Col 11 Line 4) (11)	(	Adjusted Kentucky Jurisdictional Capitalization ol 8 + Col 10 + Col 11) (12)		Adjusted Capital Structure (13)	Annual Cost Rate (14)		Cost of Capital ol 13 x Col 14) (15)
1.	Short Term Debt	\$ 109,501,039	2.90%	\$	(14,370,042)	\$	(52,545)	\$	95,078,452		2.91%	0.29%		0.01%
2.	Long Term Debt	1,613,380,061	42.80%		(212,082,001)		(775,493)		1,400,522,567		42.80%	3.64%		1.56%
3.	Common Equity	2,046,742,340	54.30%		(269,066,651)		(983,862)		1,776,691,827		54.29%	10.25%		5.56%
4.	Total Capitalization	\$ 3,769,623,440	100.000%	\$	(495,518,694)	\$	(1,811,900)	\$	3,272,292,846	_	100.000%			7.13%
5.	Weighted Cost of Capital Grossed up	for Income Tax Effect {ROR	. + (ROR - DR) x [	ΓR / (	1 - TR)]}									10.22%

Garrett

#### KENTUCKY UTILITIES COMPANY ANALYSIS OF THE EMBEDDED COST OF CAPITAL AT August 31, 2013

				LONG-TERM	I DEBT					
						An	inualized Cost			
					Amortized Debt		Amortized Loss-	Letter of Credit	t	Embedded
	5	Б.	B		<u>Issuance</u>				<b>.</b>	0 .
Pollution Control Bonds -	Due	Rate	<u>Principal</u>	Interest	Exp/Discount		Reacquired Debt	and other fees	Total	Cost
Mercer Co. 2000 Series A	05/01/23	0.080%	\$ 12.900.000	\$ 10,320	\$ -		\$ 46,931	\$ 137.839	a \$ 195,090	1.512%
Carroll Co. 2000 Series A	02/01/23	0.080%	20,930,000	\$ 10,320 62,790	ء 4,104		36,300	20,930		0.593%
Carroll Co. 2002 Series A	02/01/32	0.300%	2,400,000	7,200	2,856		4,164	2,400		0.693%
Muhlenberg Co. 2002 Series A	02/01/32	0.300%	2,400,000	7,200	1,140		12,744	2,400		0.979%
Mercer Co. 2002 Series A	02/01/32	0.330%	7,400,000	24,420	3,180		12,744	7,400		0.647%
Carroll Co. 2002 Series C	10/01/32	0.330%	96,000,000	134,400	73,658		186,036	300,538		0.724%
Carroll Co. 2002 Series C	10/01/32	0.140%	50,000,000	30,000	73,000		105,113	536,621		1.343%
			, ,		40.044		105,113			
Carroll Co. 2006 Series B	10/01/34	0.070%	54,000,000	37,800	48,011		-	580,188		1.233%
Carroll Co. 2007 Series A	02/01/26	5.750%	17,875,000	1,027,813	33,342		-	-	1,061,155	5.937%
Trimble Co. 2007 Series A	03/01/37	6.000%	8,927,000	535,620	16,072		-	-	551,692	6.180%
Carroll Co. 2008 Series A	02/01/32	0.070%	77,947,405	54,563	34,503		-	837,484		1.189%
Called Bonds				-	-		201,063	1	201,063	
First Mortgage Bonds -										
2010 due 2015	11/01/15	1.625%	250,000,000	4,062,500	461,126	**		-	4,523,626	1.809%
Debt discount on FMB	11/01/15	1.625%	(386,458)		175,000	**			175,000	-45.283%
2010 due 2020	11/01/20	3.250%	500,000,000	16,250,000	418,360	**		-	16,668,360	3.334%
Debt discount on FMB	11/01/15	3.250%	(1,362,375)		189,000	**			189,000	-13.873%
2010 due 2040	11/01/40	5.125%	750,000,000	38,437,500	249,641	**		-	38,687,141	5.158%
Debt discount on FMB	11/01/40	5.125%	(7,380,260)		271,250	**			271,250	-3.675%
S-3 SEC Shelf Registration	03/27/15				2,292				2,292	
Revolving Credit Facility	10/19/16				676,646	3&4		500,000		
Letter of Credit Facility	04/29/14				169,819				169,819	
Total External Debt			\$ 1,841,650,311	\$ 60,682,126	\$ 2,830,000		\$ 605,251	\$ 2,925,800	\$ 67,043,177	3.640%
Notes Payable to PPL.		2	\$ -	\$ -	\$ -		\$ -	\$ -	\$ -	
Total Internal Debt			\$ -	\$ -	\$ -	•	\$ -	\$ -	\$ -	0.000%
		Total	\$ 1,841,650,311	\$ 60,682,126	\$ 2,830,000	Ī	\$ 605,251	\$ 2,925,800	\$ 67,043,177	3.640%

			SHORT-TERI	M DEBT				
					Annualized Cost			
	Rate	<u>Principal</u>	<u>Interest</u>	<u>Expense</u>	Loss	Premium	Total	Embedde Cost
Notes Payable to Associated Company Revolving Credit Facility Payable Commercial Paper Program Varies	0.360% 0.291%	\$ - - 124,993,822	\$ - - 363,732	\$ - - -	\$ - -	\$ - - -	\$ - 363,732	0.0009 0.0009 0.2919
	Total	\$ 124,993,822	\$ 363,732	\$ -	\$ -	\$ -	\$ 363,732	0.291
Embedded Cost of Total Debt		\$ 1,966,644,133	\$ 61,045,858	\$ 2,830,000	\$ 605,251	\$ 2,925,800	\$ 67,406,909	3.428

<sup>\*\*</sup> Debt discount shown on separate line.

<sup>1</sup> Series P and R bonds were redeemed in 2003, and 2005, respectively. They were not replaced with other bond series. The remaining unamortized expense is being amortized over the remainder of the original lives (due 5/15/07, 6/1/25, 6/1/35, and 6/1/36 respectively) of the bonds as loss on reacquired debt.

2 Fidelia Notes Payable were paid off on 11/1/2010 with PPL Notes Payable that were paid off with the new FMB issues on 11/16/2010.

3 Included setup fees for the Wachovia Credit Facility in Long-term Debt due to 4 year credit arrangement

<sup>4</sup> Credit Facility amended effective October 19, 2011. New term of 5 years at lower interest rate.

a - Letter of credit fee = (principal bal + 45 days interest)\*2% L/C Fee and .25% L/C Fronting Fee. Rate based on company credit rating. Remarketing Fee = 10 basis points.

b - Remarketing fee = 10 basis points

c - Remarketing fee = 25 basis points (25bp on \$43.7M; 5bp on \$52.3M; avg 14bp + \$166,137.60 Annual Ins. Premium)

d - Revolving Credit facility fee = 12.5 basis points

## ECR - Gross-up Revenue Factor & Composite Income Tax Calculation 2013

(1)	Assume pre-tax income of	2013 Federal & State Production Credit W/ 6% 2013 State Tax Rate Included \$ 100.0000	
(2)	State income tax (see below)	5.6400	(40)
(4) (5) (6)	Taxable income for Federal income tax before production credit a. Production Rate	94.3600 9%	(1) - (3)
(7) (8) (9) (10)	<ul><li>b. Allocation to Production Income</li><li>c. Allocated Production Rate (a x b)</li></ul>	100% 9.00%	
(11)	Less: Production tax credit	8.4924	(6)*(9)
(12) (13) (14)	Taxable income for Federal income tax	85.8676	(6) - (11)
(15) (16)	Federal income tax	30.0537	(13) *35%
(17) (18)	Total State and Federal income taxes	\$ 35.6937	(3)+(15)
(19)	Gross-up Revenue Factor	64.3063	100-(18)
<ul><li>(21)</li><li>(22)</li><li>(23)</li><li>(24)</li><li>(25)</li></ul>	Therefore, the composite rate is: Federal State Total	30.0537% 5.6400% 35.6937%	(15)/100 (3)/100 (23)+(24)
(26) (27) (28) (29)			
(30) (31) (32)	State Income Tax Calculation Assume pre-tax income of	\$ 100.0000	
(33)	Production credit @ 6%	6.0000	
(35) (36)	Taxable income for State income tax	94.0000	(32) - (34)
(37)	State Tax Rate	6.0000%	
(39)	State Income Tax	5.6400	(36) * (38)

### Response to Commission Staff's First Request for Information in Appendix B of Commission's Order Dated December 23, 2013

Case No. 2013-00436

#### **Question No. 6**

Witness: Robert M. Conroy

- Q-6. Provide the actual average residential customer's usage. Based on this usage amount, provide the dollar impact the over/under-recovery will have on the average residential customer's bill for the requested recovery period. Provide all supporting calculations and documentation in Excel spreadsheet format, with formulas intact and unprotected and all rows and columns accessible.
- A-6. Please see the attachment being provided in Excel format.

The actual average residential customer's usage for the 12-months ending November 30, 2013 is 1,208 kWh per month. Actual average monthly usage for residential customers will vary from month to month depending upon the time period of the year.

Based upon distributing the over-recovered position of \$347,028 in one month, the ECR billing factor will be lower by approximately 0.31% for that month. For a residential customer using 1,208 kWh per month the impact of the adjusted ECR billing factor would be a decrease of approximately \$0.31 on that month's bill, using rates and adjustment clause factors in effect for the November 2013 billing month.

#### KU ECR 6-Month Review Case No. 2013-00436

		INP	UTS:
	Expense Month for calculations		Nov-13
ECR Monthly Filing -	Expense Month for calculations		
Form 1.10 - Line 13	Adjusted Net Juris E(M) as filed	\$	5,438,479
Form 1.10 - Line 14	Group 1 Rev as % 12-mo Total Rev		40.55%
Form 1.10 - Line 15	Group 1 E(m)	\$	2,205,303
Form 1.10 - Line 16	Group 1 12-month avg revenue	\$	45,373,396
Form 1.10 - Line 17	Billing Factor filed		4.86%
Financial Reports - Y	ear Ended Current Month		Nov-13
Page 28.1	Residential Sales (kWh)	6	6,085,794,561
Page 41	Residential Avg Customers Year Ended		419,984
-	times 12 for 12-month number		5,039,808
Response to DR Q2	Adjustment for (Over)/Under Collection		(347,028)
	Number of Months to collect/distribute		1
	Monthly Adj for (Over)/Under Collection		(347,028)
	Position for Review Period Collection		OVER
Billing Factors			
Tariff	Basic Service Charge		10.75
Tariff	Base Rate		0.07459
Monthly Filing	FAC for Nov-13		(0.00180)
Monuny i ming			0.00301

#### Residential Bill Impact Calculations

	Adjusted Net Juris E(M) as filed Adjustment for (Over)/Under Collection as adjusted for (Over)/Under Collection	5,438,479 (347,028) 5,091,451			
	Group 1 Rev as % 12-mo Total Rev Group 1 E(m) as filed Group 1 E(m) as adjusted	\$ 40.55% 2,205,303 2,064,583			
	Group 1 12-month revenue Billing Factor as filed Billing Factor as adjusted Impact to billing factor	45,373,396 4.86% 4.55% -0.31%			
Bill Impact, Average Residen Basic Service Charge Base Rate FAC for Nov-13 DSM	tial Customer	10.75 0.07459 (0.00180) 0.00301	\$	10.75 90.10 (2.17) 3.64 102.32	ge Residential Usage 1,208 kWh
ECR (as billed) ECR (as adjusted) Change in ECR			\$ \$ = o	4.97 4.66 (0.31) ver collection = d der collection = r	