

Joint Application of Louisville Gas & Electric Co. & Kentucky Utilities Co. for Certificates of Public
Convenience & Necessity to Construct New Generation Facilities
Case No. 2014-00002
Attorney General's Third Data Requests

1. Reference page 13 of David Sinclair's supplemental testimony. To the extent Mr. Sinclair's workpapers used to support the annual capital and O&M revenue requirements for each year of the analysis of the Brown Solar Facility have changed in any way since the date of his original testimony, please provide those workpapers in electronic format with in electronic format with data and formulae in all cells and rows intact and fully accessible. Additionally, indicate whether these revenue requirements reflect the investment tax credit for the facility.
2. Provide the estimated cumulative present value of the revenue requirement benefit associated with the investment tax credit for the Brown Solar Facility as reflected in the Company's base case economic analysis of the facility.
3. Identify the level of investment tax credits or production tax credits that have been in effect for solar generating facilities for each year since 2004.
4. Does the Company expect that tax credits for solar generating facilities will no longer be available after 2016? If so, provide the analysis or other basis supporting this opinion.
5. Reference the response to question no. 153 of the Attorney General's initial data requests. Provide the analysis and data supporting the assumed energy production level of the Brown Solar facility and indicate whether the Company is willing to guarantee this level of performance over the life of the project.
6. Provide the estimated annual average cost of energy produced by the Brown Solar Facility along with the estimated cost of energy avoided by the project for each year of the base case analysis of the facility expressed on a dollars per MWh basis, including each component of the avoided energy cost.
7. Reference the response to question no. 154 of the Attorney General's initial data requests, provide the analysis and data supporting the assumed 90% capacity credit for the Brown Solar Facility.
8. Provide the cumulative present value of the economic benefit produced from the assumed 90% capacity credit for the Brown Solar Facility as reflected in the Company's base case analysis.

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9. Reference the response to question no. 156 of the Attorney General's initial data requests, provide the average cost of RECs purchased (\$/REC) for the Companies' Green Energy Program for each of the last four calendar years.
10. Reference the response to question no. 163 of the Attorney General's initial data requests. Provide the interconnection request filed for the Brown Solar Facility and discuss the results of the analysis of transmission upgrades and the related costs of such upgrades required for the Brown Solar Facility.
11. Provide the estimated average cost of wind energy alternatives which are available to the Companies for each of the next ten calendar years.
12. Provide the results of any economic analysis which was conducted to compare the Brown Solar facility to wind energy alternatives.