

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF LOUISVILLE GAS AND ELECTRIC)
COMPANY FOR AN ADJUSTMENT OF ITS) CASE NO.
ELECTRIC AND GAS RATES) 2014-00372

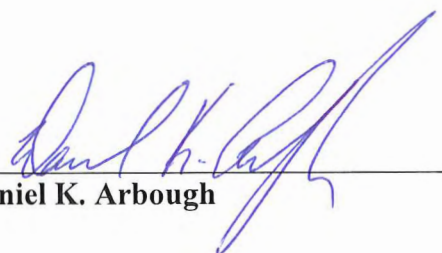
RESPONSE OF
LOUISVILLE GAS AND ELECTRIC COMPANY
TO
ATTORNEY GENERAL'S SUPPLEMENTAL
REQUESTS FOR INFORMATION
DATED FEBRUARY 6, 2015

FILED: FEBRUARY 20, 2015

VERIFICATION

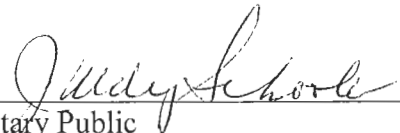
COMMONWEALTH OF KENTUCKY)
) SS:
COUNTY OF JEFFERSON)

The undersigned, **Daniel K. Arbough**, being duly sworn, deposes and says that he is Treasurer for Louisville Gas and Electric Company and Kentucky Utilities Company and an employee of 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.



Daniel K. Arbough

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 13th day of February 2015.



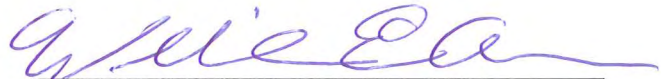
Notary Public (SEAL)

My Commission Expires:
JUDY SCHULER
Notary Public, State at Large, KY
My commission expires July 11, 2018
Notary ID # 512743

VERIFICATION

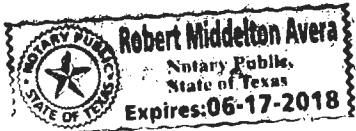
STATE OF Texas)
)
COUNTY OF Hays) SS:

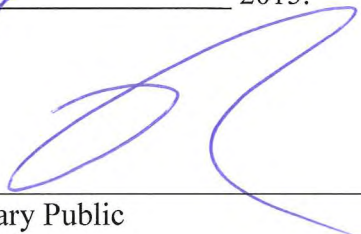
The undersigned, **William E. Avera**, being duly sworn, deposes and says he is President of FINCAP, Inc., that he has personal knowledge of the matters set forth in the responses for which he is identified as the witness, and the answers contained therein are true and correct to the best of his information, knowledge and belief.



William E. Avera

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 10 day of February 2015.





Notary Public (SEAL)

My Commission Expires:

VERIFICATION

COMMONWEALTH OF KENTUCKY)
) SS:
COUNTY OF JEFFERSON)

The undersigned, **Lonnie E. Bellar**, being duly sworn, deposes and says that he is Vice President – Gas Distribution, for Louisville Gas and Electric 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.



Lonnie E. Bellar

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 18th day of February 2015.



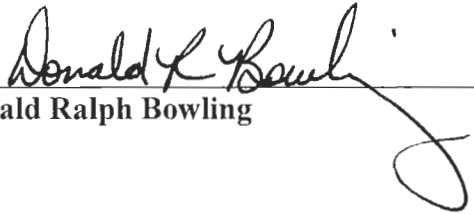
Notary Public (SEAL)

My Commission Expires:
JUDY SCHOOLER
Notary Public, State at Large, KY
My commission expires July 11, 2018
Notary ID # 512743

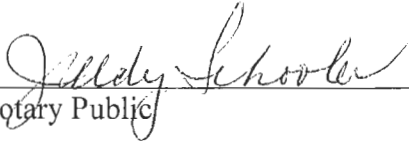
VERIFICATION

COMMONWEALTH OF KENTUCKY)
) SS:
COUNTY OF JEFFERSON)

The undersigned, Donald Ralph Bowling, being duly sworn, deposes and says that he is Vice President, Power Production, for Kentucky Utilities Company and Louisville Gas and Electric Company and an employee of 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.


Donald Ralph Bowling

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 13th day of February 2015.

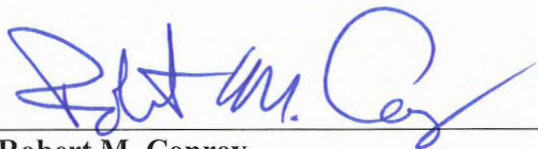
 (SEAL)
Notary Public

My Commission Expires:
JUDY SCHOOLER
Notary Public, State at Large, KY
My commission expires July 11, 2018
Notary ID # 512743


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 Louisville Gas and Electric Company and Kentucky Utilities Company, an employee of 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

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 18th day of February 2015.

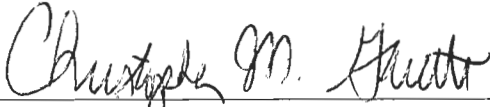

Notary Public (SEAL)

My Commission Expires:
JUDY SCHOOLER
Notary Public, State at Large, KY
My commission expires July 11, 2018
Notary ID # 512749

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 Kentucky Utilities Company and Louisville Gas and Electric Company and an employee of LG&E and KU Services Company, 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

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 13th day of February 2015.



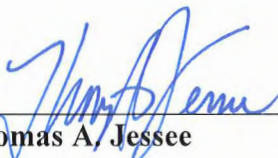
Notary Public (SEAL)

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Notary Public, State at Large, KY
My commission expires July 11, 2018
Notary ID # 512743

VERIFICATION

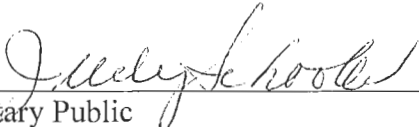
COMMONWEALTH OF KENTUCKY)
) SS:
COUNTY OF JEFFERSON)

The undersigned, **Thomas A. Jessee**, being duly sworn, deposes and says that he is Vice President, Transmission for Kentucky Utilities Company and Louisville Gas and Electric Company and an employee of 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.



Thomas A. Jessee

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 15th day of February 2015.



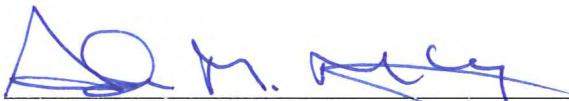
Notary Public (SEAL)

My Commission Expires:
JUDY SCHOGLER
Notary Public, State at Large, KY
My commission expires July 11, 2018
Notary ID # 512743

VERIFICATION

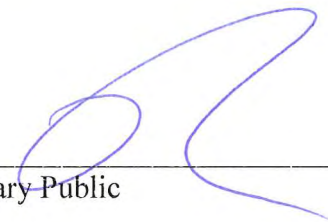
STATE OF TEXAS)
) SS:
COUNTY OF TRAVIS)

The undersigned, **Adrien M. McKenzie**, being duly sworn, deposes and says he is Vice President of FINCAP, Inc., 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.



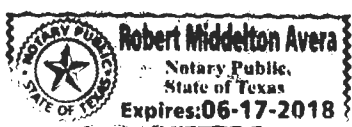
Adrien M. McKenzie

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 11 day of February 2015.



Notary Public (SEAL)

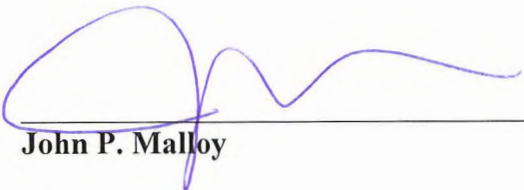
My Commission Expires:



VERIFICATION

COMMONWEALTH OF KENTUCKY)
) SS:
COUNTY OF JEFFERSON)

The undersigned, **John P. Malloy**, being duly sworn, deposes and says that he is Vice President, Customer Services for Kentucky Utilities Company and Louisville Gas and Electric Company and an employee of 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.



John P. Malloy

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 13th day of February 2015.



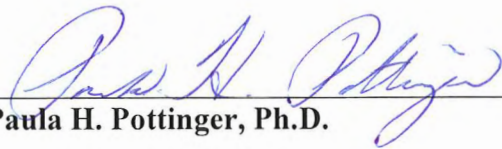
Notary Public (SEAL)

My Commission Expires:
JUDY SCHOOLER
Notary Public, State at Large, KY
My commission expires July 11, 2018
Notary ID # 512743

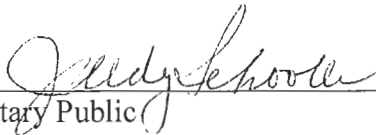
VERIFICATION

COMMONWEALTH OF KENTUCKY)
) SS:
COUNTY OF JEFFERSON)

The undersigned, **Paula H. Pottinger, Ph.D.**, being duly sworn, deposes and says that she is Senior Vice President, Human Resources for Kentucky Utilities Company and Louisville Gas and Electric Company and an employee of LG&E and KU Services Company, and that she has personal knowledge of the matters set forth in the responses for which she is identified as the witness, and the answers contained therein are true and correct to the best of her information, knowledge and belief.


Paula H. Pottinger, Ph.D.

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 13th day of February 2015.

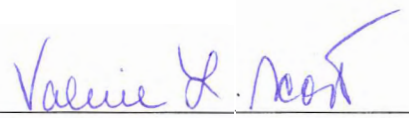
 (SEAL)
Notary Public()

My Commission Expires:
JUDY SCHOULER
Notary Public, State at Large, KY
My commission expires July 11, 2018
Notary ID # 512743

VERIFICATION

COMMONWEALTH OF KENTUCKY)
) SS:
COUNTY OF JEFFERSON)

The undersigned, **Valerie L. Scott**, being duly sworn, deposes and says that she is Controller for Kentucky Utilities Company and Louisville Gas and Electric Company and an employee of LG&E and KU Services Company, and that she has personal knowledge of the matters set forth in the responses for which she is identified as the witness, and the answers contained therein are true and correct to the best of her information, knowledge and belief.



Valerie L. Scott

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 15th day of February 2015.

 (SEAL)

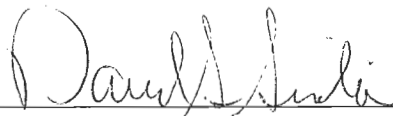
Notary Public

My Commission Expires:
JUDY SCHOOLER
Notary Public, State at Large, KY
My commission expires July 11, 2018
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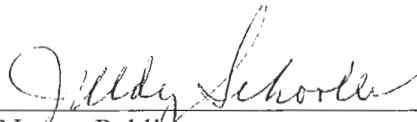
COMMONWEALTH OF KENTUCKY)
) SS:
COUNTY OF JEFFERSON)

The undersigned, **David S. Sinclair**, being duly sworn, deposes and says that he is Vice President, Energy Supply and Analysis for Kentucky Utilities Company and Louisville Gas and Electric Company and an employee of 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.



David S. Sinclair

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 12th day of February 2015.



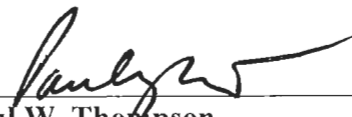
Notary Public (SEAL)

My Commission Expires:
JUDY SCHORLE
Notary Public, State at Large, KY
My commission expires July 11, 2018
Notary ID # 512743

VERIFICATION

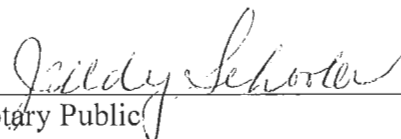
COMMONWEALTH OF KENTUCKY)
) SS:
COUNTY OF JEFFERSON)

The undersigned, **Paul W. Thompson**, being duly sworn, deposes and says that he is Chief Operating Officer for Kentucky Utilities Company and Louisville Gas and Electric Company and an employee of 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.



Paul W. Thompson

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 13th day of February 2015.



Notary Public (SEAL)

My Commission Expires:

JUDY SCHOOLER
Notary Public, State at Large, KY
~~My commission expires July 11, 2018~~
Notary ID # 512743

VERIFICATION

COMMONWEALTH OF KENTUCKY)
) SS:
COUNTY OF JEFFERSON)

The undersigned, **John N. Voyles, Jr.**, being duly sworn, deposes and says that he is the Vice President, Transmission and Generation Services for Louisville Gas and Electric Company and Kentucky Utilities Company and an employee of 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.

John N. Voyles, Jr.

John N. Voyles, Jr.

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 12th day of February 2015.

Judy Schooler

Notary Public (SEAL)

My Commission Expires:
JUDY SCHOOLER
Notary Public, State at Large, KY
My commission expires July 11, 2018

Notary ID # 512743

LOUISVILLE GAS AND ELECTRIC COMPANY

CASE NO. 2014-00372

**Response to Attorney General's Supplemental Requests for Information
Dated February 6, 2015**

Question No. 1

Responding Witness: John P. Malloy / Christopher M. Garrett

- Q-1. Please reference the response to AG 1-2. Please provide any explanation or other information the company may have to explain the approximate 148.56% increase in uncollectible expense for the residential class in 2014 compared with 2013.
- A-1. The increase in uncollectible expense in 2014 compared to 2013 was driven largely by the severe cold weather experienced during the winter of 2013-2014, resulting in significant increases in the amounts owed by customers.

In an effort to provide assistance to customers as a result of the severe cold weather, the Company offered residential customers flexibility by modifying installment plan guidelines from February to April 2014, consistent with the KPSC request. See response to ACM 1-17 for further details.

LOUISVILLE GAS AND ELECTRIC COMPANY

CASE NO. 2014-00372

**Response to Attorney General's Supplemental Requests for Information
Dated February 6, 2015**

Question No. 2

Responding Witness: Christopher M. Garrett

- Q-2. Reference AG 1-2 and AG 1-3(a). Explain why uncollectible expense has increased significantly more than late payment charges.
- A-2. See the response to Question No. 1 for an explanation regarding the increase in uncollectible expense in 2014. Late payment fees were lower in 2013 and 2014 as the Company reduced the late payment fee from 5% to 3% for certain rate schedules, including residential service, per the settlement reached in Case No. 2012-00222.

LOUISVILLE GAS AND ELECTRIC COMPANY

CASE NO. 2014-00372

**Response to Attorney General's Supplemental Requests for Information
Dated February 6, 2015**

Question No. 3

Responding Witness: Christopher M. Garrett

- Q-3. Reference AG 1-2 and AG1-3(d). Confirm that while LGE seeks \$4,028,000 in uncollectible expense in the forecasted test period, the uncollectible average from 2010-2014 is \$3,730,184 and from 2011-2014 is \$3,186,619.
- A-3. LG&E has included \$4,028,000 in uncollectible expense in the forecasted test period, and the uncollectible average from 2010-2014 is \$3,730,184 and from 2011-2014 is \$3,186,619.

The \$4,028,000 uncollectible expense in the forecasted test period represents .28% of total revenues. This write-off percentage is lower than the actual percentage for the most recent calendar year and not unreasonable when compared to the five year average.

LOUISVILLE GAS AND ELECTRIC COMPANY

CASE NO. 2014-00372

Response to Attorney General's Supplemental Requests for Information
Dated February 6, 2015

Question No. 4

Responding Witness: D. Ralph Bowling

Q-4. Reference response to AG 1-19. For each title listed in the response please indicate if the position will be at a plant or headquarters. For each position that will be located at a generation plant, please indicate which plant the position will be assigned to.

A-4.

Title	# of positions	Plant/Headquarters
Chemical Engineer	1	Trimble County Plant
Chemical Engineer	1	Ghent Plant
Chemical Engineer	1	Headquarters
Civil Engineer	1	Trimble County Plant
Electrical Engineer	1	Trimble County Plant
Electrical Engineer	1	Ghent Plant
Electrical Engineer	1	Headquarters
Mechanical Engineer	2	Trimble County Plant
Mechanical Engineer	3	Ghent Plant
Mechanical Engineer	1	EW Brown Plant
Mechanical Engineer	1	Cane Run Plant
Mechanical Engineer	4	Headquarters
Mgr Major Capital Projects	1	Headquarters
Project Coordinator	9	Headquarters
Boiler Welding QA/QC Specialist	1	Headquarters
Buyer	2	Cane Run Plant
Buyer	1	Trimble County Plant
Buyer	-1	Mill Creek Plant
CCS Administrative Coordinator	1	Headquarters
Civil Engineer	4	Headquarters
Commercial Ops Analyst	1	Headquarters
Compliance Engineer	1	Headquarters
Consumer Behavioral Analyst	1	Headquarters

Contract Administrator	3	Headquarters
Dept/Div Secretary	1	Trimble County Plant
Dir. Fleet Maint Perfm & Reliab	1	Headquarters
Drafter	1	Headquarters
E&I Technician	3	EW Brown Plant
E&I Technician	2	Ghent Plant
Electrical Engineer	3	Headquarters
Engineer	3	Headquarters
Engineer	-1	Green River Plant
Group Leader - Engineering	1	Ghent Plant
I&E Maintenance Planner	1	Cane Run Plant
I&E Technician (SAM)	1	Ghent Plant
Lab Assistant	1	Trimble County Plant
Lab Tech	1	Ghent Plant
Maintenance Tech	6	Ghent Plant
Maintenance Tech	4	Cane Run Plant
Material Handling Leader	1	Trimble County Plant
Mechanic	-1	Mill Creek Plant
Mechanic	2	Ghent Plant
OF Turbine Mechanic	2	Ohio Falls Hydro facility
Operator/Production Leader	1	Ghent Plant
Operator/Production Leader	8	Trimble County Plant
Production Leader	1	Mill Creek Plant
R&D Scientist	5	Headquarters
Service Shop Coordinator	1	Headquarters
Sourcing Assistant	1	Headquarters
Sr. Labor Distribution Clerk/Timekeeper	1	Cane Run Plant
Sr. Labor Distribution Clerk/Timekeeper	1	Trimble County Plant
Supervisor - Maintenance	1	Trimble County Plant
Supply Mkt and Inv Analyst	1	Headquarters
Technician/Mntc Leader	3	Trimble County Plant
Technician/Mntc Leader	1	Ghent Plant
Trainer	1	Cane Run Plant
Trainer	1	EW Brown Plant
Turbine Specialist	2	Headquarters
Warehouse Supervisor	1	Headquarters
Dir ES Business Information	-1	Headquarters
ES SR. Business Info Analyst	-1	Headquarters
Mgr Eng Serv Business Info	-1	Headquarters
Mgr. Ops Analysis	-1	Headquarters

Chief Operating Officer	-2	Headquarters
Green River transfer to metering	-11	Green River Plant
Manager- Tyrone	-1	Tyrone Plant
Green River retirement	-15	Green River Plant
Cane Run Retirement	-25	Cane Run Plant
CCR Supervisor	1	Trimble County Plant
CIP Clerk	1	Ghent Plant
CIP Control Specialist	1	Ghent Plant
Control Specialist	1	Trimble County

LOUISVILLE GAS AND ELECTRIC COMPANY

CASE NO. 2014-00372

**Response to Attorney General's Supplemental Requests for Information
Dated February 6, 2015**

Question No. 5

Responding Witness: Paul W. Thompson / David S. Sinclair

- Q-5. Reference the response to AG 1-14.
- a. Provide information as to if there are any updates by FERC on the pending North American Energy Standards Board submission to change the natural gas industry scheduling process.
 - b. Please provide a copy of the NERC Reliability Guideline: Generating Unit Winter Weather Readiness-Current Industry Practices.
 - c. When will the Companies have these processes formalized and standardized across the fleet?
- A-5.
- a. FERC has not acted in NOPR RM14-2-000 to change the natural gas scheduling process.
 - b. See attached.
 - c. In addition to the Companies' existing winter operating practices, the Companies intend to have the winterization processes standardized across the generation fleet in the fourth quarter of 2015. Although NERC standards do not require implementation of winter weather readiness and fleet standardization processes, best practices suggest implementing these procedures to maintain and enhance the reliability of the bulk power system. Once in place, these procedures will be a part of a dynamic process that will continue to change according to experience, information and industry practices.

Reliability Guideline

Generating Unit Winter Weather Readiness – Current Industry Practices

Preamble:

It is in the public interest for NERC to develop guidelines that are useful for maintaining or enhancing the reliability of the bulk power system (BPS). Reliability Guidelines provide suggested guidance on a particular topic for use by BPS users, owners, and operators according to each entity's circumstances. Reliability Guidelines are not to be used to provide binding norms, establish mandatory reliability standards, or create parameters by which compliance to standards is monitored or enforced.

Purpose:

This Reliability Guideline is applicable to electricity sector organizations responsible for the operation of the BPS. Although this guideline was developed as a result of an unusual cold weather event in an area not normally exposed to freezing temperatures, it provides a general framework for developing an effective winter weather readiness program for generating units throughout North America. The focus is on maintaining individual unit reliability and preventing future cold weather related events. This document is a collection of industry practices compiled by the NERC Operating Committee (OC). While the incorporation of these practices is strictly voluntary, developing a winter weather readiness program using these practices is highly encouraged to promote and achieve the highest levels of reliability for these high impact weather events.

Assumptions:

- A. Each BPS generation owner and operator is responsible and accountable for maintaining generating unit reliability.
- B. Entities should develop and apply plant-specific winter weather readiness plans, as appropriate, based on factors such as geographical location, technology and plant configuration.

Guideline Details:

An effective winter weather readiness program, which includes severe winter weather event preparedness, should generally address the following components: (I) Safety; (II) Management Roles and Expectations; (III) Processes and Procedures; (IV) Evaluation of Potential Problem Areas; (V) Testing; (VI) Training; and (VII) Communications. This program will be referred to hereafter as a winter weather preparation procedure.

I. Safety

Safety remains the top priority during winter weather events. Job safety briefings should be conducted during preparation for and in response to these events.

II. Management Roles and Expectations

Management plays an important role in maintaining effective winter weather programs. The management roles and expectations below provide a high-level overview of the core management responsibilities related to winter weather preparation. Each entity should tailor these roles and expectations to fit within their own corporate structure.

A. Senior Management

- 1) Set expectations for safety, reliability, and operational performance.
- 2) Ensure that a winter weather preparation procedure exists for each operating location.
- 3) Consider a fleet-wide annual winter preparation meeting, training exercise, or both to share best practices and lessons learned.
- 4) Share insights across the fleet and through industry associations (formal groups or other informal networking forums).

B. Plant Management

- 1) Develop a winter weather preparation procedure and consider appointing a designee responsible for keeping this procedure updated with industry identified best practices and lessons learned.
- 2) Ensure the site specific winter weather preparation procedure includes processes, staffing plans, and timelines that direct all key activities before, during and after severe winter weather events.
- 3) Ensure proper execution of the winter weather preparation procedure.
- 4) Conduct a plant readiness review prior to an anticipated severe winter weather event.
- 5) Encourage plant staff to look for areas at risk due to winter conditions and bring up opportunities to improve readiness and response.
- 6) Following each winter, conduct an evaluation of the effectiveness of the winter weather preparation procedure and incorporate lessons learned.

III. Processes and Procedures

A winter weather preparation procedure should be developed for seasonal winter preparedness. Components of an effective winter weather preparation procedure are included as Attachment 1.

After a severe winter weather event, entities should utilize a review process to formally recognize strengths in the program, evaluate improvement opportunities, and identify lessons learned. Procedures should be reviewed and updated using these lessons learned after every winter event to institutionalize knowledge from prior events. Changes to the procedure and lessons learned should be communicated to the appropriate personnel.

IV. Evaluation of Potential Problem Areas

Identify and prioritize components, systems, and other areas of vulnerability which may experience freezing problems or other cold weather operational issues.

- A. This includes equipment that has the potential to:
- 1) Initiate an automatic unit trip,
 - 2) Impact unit start-up,
 - 3) Initiate automatic unit runback schemes and/or cause partial outages,
 - 4) Cause damage to the unit,
 - 5) Adversely affect environmental controls that could cause full or partial outages,
 - 6) Adversely affect the delivery of fuel or water to the units,
 - 7) Cause other operational problems such as slowed or impaired field devices, or
 - 8) Create a weather related safety hazard
- B. Based on previous cold weather events, a list of typical problem areas are identified below. This is not meant to be an all inclusive list. Individual entities should review their plant design and configuration, identify areas with potential exposure to the elements, ambient temperatures, or both and tailor their plans to address them accordingly.
- 1) Level transmitters
 - i. Drum level transmitters and sensing lines
 - ii. Condensate tank level transmitters and sensing lines
 - iii. De-aerator tank level transmitters and sensing lines
 - iv. Hotwell level transmitters and sensing lines
 - v. Fuel oil tank level transmitters / indicators
 - 2) Pressure Transmitters
 - i. Gas turbine combustor pressure transmitters and sensing lines
 - ii. Feed water pump pressure transmitters and sensing lines
 - iii. Condensate pump pressure transmitters and sensing lines
 - iv. Steam pressure transmitters and sensing lines
 - 3) Flow Transmitters
 - i. Steam flow transmitters and sensing lines
 - ii. Feed water pump flow transmitters and sensing lines
 - iii. High pressure steam attemperator flow transmitters and sensing lines
 - 4) Instrument Air System
 - 5) Motor-Operated Valves, Valve Positioners, and Solenoid Valves
 - 6) Drain Lines, Steam Vents, and Intake Screens

- 7) Water Pipes and Fire Suppression Systems¹
 - i. Low/no water flow piping systems
 - 8) Fuel Supply and Ash Handling
 - i. Coal piles and coal handling equipment
 - ii. Transfer systems for backup fuel supply
 - iii. Gas supply regulators, other valves and instrumentation (may require coordination with gas pipeline operator)
 - iv. Ash disposal systems and associated equipment
- C. Potential vulnerabilities associated with emergency generators, including Blackstart generators, should be evaluated when developing the site specific winter weather preparation procedure as they may provide critical system(s) backup.

V. Testing

In addition to the typical problem areas identified above, emphasis should be placed on the testing of low frequency tasks such as startup of emergency generators, where applicable.

VI. Training

Coordinate annual training in winter specific and plant specific awareness and maintenance training. This may include response to freeze protection panel alarms, troubleshooting and repair of freeze protection circuitry, identification of plant areas most affected by winter conditions, review of special inspections or rounds implemented during severe weather, fuel switching procedures, knowledge of the ambient temperature for which the freeze protection system is designed, and lessons learned from previous experiences or the NERC Lessons Learned program.

- A. Consider holding a winter readiness meeting on an annual basis to highlight preparations and expectations for severe cold weather.
- B. Operations personnel should review cold weather scenarios affecting instrumentation readings, alarms, and other indications on plant control systems.
- C. Ensure appropriate NERC Generation Availability Data Systems (GADS) coding for unit derates or trips as a result of a severe winter weather events to promote lessons learned, knowledge retention, and consistency. Examples may include NERC GADS code 9036 "Storms (ice, snow, etc.)" or code 9040 "Other Catastrophe."

VII. Winter Event Communications

Clear and timely communication is essential to an effective program. Key communication points should include the following:

¹ For safety reasons, fire protection systems should also be included in this identification process. These problem areas should be noted in the site specific winter weather preparation procedure.

- A. Before a severe winter weather event, plant management should communicate with their appropriate senior management that the site specific winter weather preparation procedure, checklists, and readiness reviews have been completed.
- B. Before and during a severe winter weather event, communicate with all personnel about changing conditions and potential areas of concern to heighten awareness around safe and reliable operations.
- C. Before and during a severe winter weather event, the affected entity(ies) will keep the Balancing Authority up to date on changes to plant availability, capacity, or other operating limitations. Depending on regional structure and market design, notification to the Reliability Coordinator and Transmission Operator may also be necessary.
- D. After a generating plant trip, derate, or failure to start due to severe winter weather, Plant Management, as appropriate, should conduct an analysis, develop lessons learned, and incorporate good industry practices.
 - 1) This process should include a feedback loop to enhance current winter weather readiness programs, processes, procedures, checklists and training (continuous improvement).
 - 2) Sharing of technical information and lessons learned through the NERC Event Analysis Program or some other method is encouraged.

Related Documents and Links:

1. [Report on Outages and Curtailments during the Southwest Cold Weather Event of February 1-5, 2011](#), dated August 2011, Federal Energy Regulatory Commission and North American Electric Reliability Corporation
2. [Winter Weather Readiness for Texas Generators](#), dated April 13, 2011, Calpine, CPS Energy, LCRA, Luminant, and NRG Energy
3. [Electric Reliability Organization Event Analysis Process](#), dated February 2012, ERO Event Analysis Process and associated [Lessons Learned](#)
4. [Previous Cold Weather Reports](#)²

Revision History:

Date	Version Number	Reason/Comments
12/03/2012	1.0	Initial Version – <i>Winter Weather Readiness</i>

² <http://www.nerc.com/page.php?cid=5|385>

Attachment 1

Elements of a Winter Weather Preparation Procedure³

This Attachment provides some key points to address in each of the winter weather preparation procedure elements, including severe winter weather event preparedness. These are not all inclusive lists. Individual entities should review their plant design and configuration, identify areas with potential exposure to the elements, ambient temperatures, or both, and tailor their plans to address them accordingly.

A. Work Management System

- 1) Review Work Management System to ensure adequate annual preventative work orders exist for freeze protection, winter weather preparedness, or both.
- 2) Ensure all freeze protection, winter weather preparedness preventative work orders, or both are completed prior to the onset of the winter season.
- 3) Review Work Management System for open corrective maintenance items that could affect plant operation and reliability in winter weather and ensure that they are completed prior to the onset of the winter season.
- 4) As appropriate to your climate, suspend freeze protection measures and remove freeze protection equipment after the last probable freeze of the winter. This may be a plant specific date established by senior management.
- 5) Ensure all engineered modification and construction activities are performed such that the changes maintain winter readiness for the plant. Newly built plants or engineered modifications can be more susceptible to winter weather.

B. Critical Instrumentation and Equipment Protection

- 1) Ensure all critical site specific problem areas (as noted above in section III. Evaluation of Potential Problem Areas) have adequate protection to ensure operability during a severe winter weather event. Emphasize the points in the plant where equipment freezing would cause a generating plant trip, derate, or failure to start.
- 2) Develop a list of critical instruments and transmitters that require increased surveillance during severe winter weather events.

C. Insulation, Heat Trace, and Other Protection Options – Ensure processes and procedures verify adequate protection and necessary functionality (by primary or alternate means) before and during winter weather. Consider the effect of wind chill when applying freeze protection. Considerations include but are not limited to:

³ Plants that will remain offline during the winter season would not need to perform winterization preparations unless it is necessary for asset protection/preservation.

- 1) Insulation thickness, quality and proper installation
 - i. Verify the integrity of the insulation on critical equipment identified in the winter weather preparation procedure. Following any maintenance, insulation should be re-installed to original specifications.
 - 2) Heat trace capability and electrical continuity/ground faults
 - i. Perform a complete evaluation of all heat trace lines, heat trace power supplies (including all breakers, fuses, and associated control systems) to ensure they maintain their accuracy. This inspection may include checking for loose connections, broken wires, corrosion, and other damage to the integrity of electrical insulation which could lead to the heat trace malfunctioning. Measure heat trace amperage and voltage, if possible, to determine whether the circuits are producing the design output. If there are areas where heat tracing is not functional, an alternate means of protection should be identified in the winter weather preparation procedure.
 - ii. Evaluation of heat trace and insulation on critical lines should be performed during new installation, during regular maintenance activities, or if damage or inappropriate installation is identified (i.e., wrapped around the valve and not just across the valve body).
 - iii. Re-install removed or disturbed heat tracing following any equipment maintenance to restore heat tracing integrity and equipment protection.
 - iv. Update and maintain all heat tracing circuit drawings and labeling inside cabinets.
 - 3) Wind breaks
 - i. Install permanent or temporary wind barriers as deemed appropriate to protect critical instrument cabinets, heat tracing and sensing lines.
 - 4) Heaters and Heat Lamps
 - i. Ensure operation of all permanently mounted and portable heaters.
 - ii. Evaluate plant electrical circuits to ensure they have enough capacity to handle the additional load. Circuits with Ground Fault Interrupters (GFIs) should be continuously monitored to make sure they have not tripped due to condensation.
 - iii. Fasten heaters and heat lamps in place to prevent unauthorized relocation.
 - 5) Covers, Enclosures, and Buildings
 - i. Install a box or enclosure with inside heat for some transmitters.
 - ii. Install covers on valve actuators to keep the actuator from accumulating ice.
 - iii. Inspect building penetrations, windows, doors, fan louvers, and other openings for potential exposure of critical equipment to the elements.
- D. Supplemental equipment – Prior to the onset of the winter season, ensure adequate inventories of all commodities, equipment and other supplies that would aid in severe winter weather event preparation or response, and that they are readily available to plant staff. Supplemental equipment might include:

- 1) Tarps
 - 2) Portable heaters, heat lamps, or both
 - 3) Scaffolding
 - 4) Blankets
 - 5) Extension cords
 - 6) Kerosene/propane
 - 7) Temporary enclosures
 - 8) Temporary insulation
 - 9) Plastic rolls
 - 10) Portable generators
 - 11) Portable lighting
 - 12) Instrumentation tubing
 - 13) Handheld welding torches
 - 14) Ice removal chemicals and equipment
 - 15) Snow removal equipment
 - 16) Cold weather Personal Protective Equipment (PPE) as appropriate to the respective regions
- E. Operational supplies – Prior to the onset of a severe winter weather event, conduct an inventory of critical supplies needed to keep the plant operational. Appropriate deliveries should be scheduled based on the severity of the event, lead times, etc. Operational supplies might include:
- 1) Aluminum Sulfate
 - 2) Anhydrous Ammonia
 - 3) Aqueous Ammonia
 - 4) Carbon Dioxide
 - 5) Caustic Soda
 - 6) Chlorine
 - 7) Diesel Fuel
 - 8) Ferric Chloride
 - 9) Gasoline (Unleaded)
 - 10) Hydrazine
 - 11) Hydrogen
 - 12) Lighter Oil (#2 Diesel)
 - 13) Sulfuric Acid

14) Calibration Gases

15) Lubricating Oils

16) Welding Supplies

17) Limestone

F. Staffing

- 1) Consider enhanced staffing (24x7) during severe winter weather events.
- 2) Arrange for lodging and meals as needed.
- 3) Arrange for transportation as needed.
- 4) Arrange for support and appropriate staffing from responsible entity for plant switchyard to ensure minimal line outages.

G. Communications

- 1) Ensure appropriate communication protocols are followed during a severe winter weather event.
- 2) Identify a back-up communication option in case the primary system is not working (i.e. satellite phone).
- 3) Ensure communication is discussed as part of the job safety briefing during a severe winter weather event.

H. Special Operations Instruction (just prior to or during a severe winter weather event)

- 1) Consider employing the “buddy system” during severe winter weather events to promote personnel safety.
- 2) Institute operator rounds utilizing cold weather checklists to verify critical equipment is protected – i.e. pumps running, heaters operating, igniters tested, barriers in place, temperature gauges checked, etc.
 - i. Monitor room temperatures, as required. Instrumentation and equipment in enclosed spaces (e.g. pump rooms) can freeze.
- 3) Test dual fuel capability and ensure adequate fuel supply (where applicable).
- 4) Consider pre-warming, early start-up, or both of scheduled units prior to a forecasted severe winter weather event.
- 5) Run emergency generators immediately prior to severe winter weather events to help ensure availability. Review fuel quality and quantity.
- 6) Place in service critical equipment such as intake screen wash systems, cooling towers, auxiliary boilers, and fuel handling equipment where freezing weather could adversely impact operations or forced outage recovery.

LOUISVILLE GAS AND ELECTRIC COMPANY

CASE NO. 2014-00372

**Response to Attorney General’s Supplemental Requests for Information
Dated February 6, 2015**

Question No. 6

Responding Witness: Paula H. Pottinger, Ph.D.

- Q-6. Reference the response to AG 1-18. Provide the compensation and employee benefits surveys and studies which the Companies rely upon for review.
- A-6. As provided in the response to PSC 1-34, on an annual basis, the Company participates in the following compensation and employee benefits surveys. A listing is provided by survey publisher, survey type and survey name below. Survey results may be reviewed upon request. The documents are voluminous in nature (approximately 7,000 pages in total) and are considered to be proprietary by the vendor and subject to licensing agreements. The survey documents will be produced for review at a convenient time and location upon request.

Survey Publisher	Survey Type	Survey Name
ALM Legal	Compensation	Law Department Compensation
AON Hewitt	Compensation	Energy Marketing & Trading Compensation
Comp Resources	Compensation	Co-Op and Student Intern Pay Rates
E EI EAPDIS	Compensation	Technical Craft Clerical
Hay	Compensation	Energy Industry Compensation
Mercer	Benefits	National Survey of Employer-Sponsored Health Plans
Mercer	Compensation	Benchmark Survey: Executive Compensation
Mercer	Compensation	Benchmark Survey: HR, IT, Finance, Accounting and Legal
Mercer	Compensation	Benchmark Survey: Metro Benchmark Compensation
Mercer	Compensation	Benchmark Survey: Logistics and Supply Chain
Mercer	Compensation	Contact Center
Mercer	Compensation	MTCS for Energy Sector (Utilities module)
Mercer	Compensation	US Compensation Planning
Towers Watson	Benefits	Benefits Data Source
Towers Watson	Compensation	AGA Executive, Management and Non-Exempt
Towers Watson	Compensation	Energy Services Executive, Middle Management and Professional
Towers Watson	Compensation	HR, IT, Office, Business Support and Professional
Towers Watson	Compensation	Supervisor and Middle Management
Towers Watson	Compensation	Technical Support and Production
Towers Watson	Compensation	Top Management

LOUISVILLE GAS AND ELECTRIC COMPANY

CASE NO. 2014-00372

**Response to Attorney General's Supplemental Requests for Information
Dated February 6, 2015**

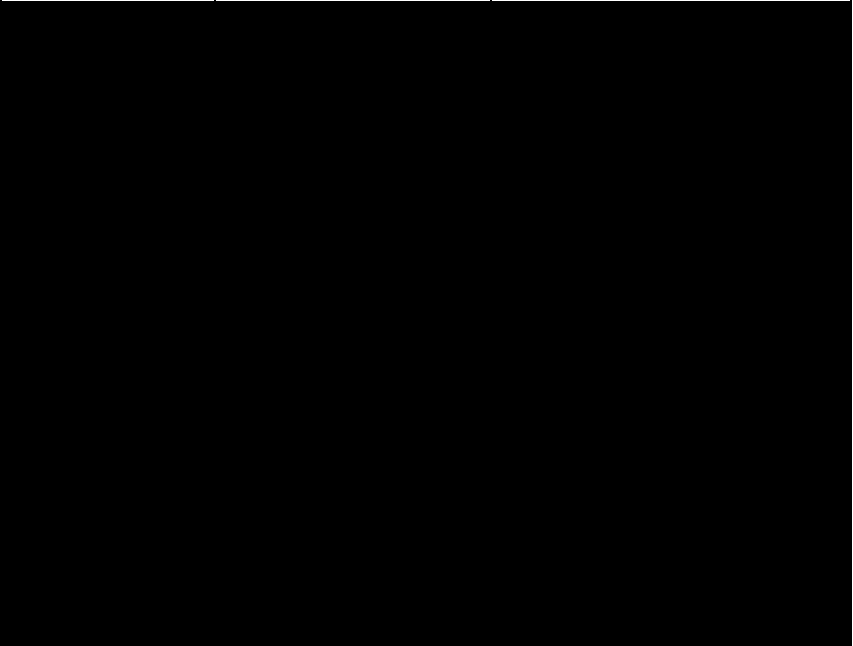
Question No. 7

Responding Witness: Valerie L. Scott

CONFIDENTIAL INFORMATION REDACTED

- Q-7. Please reference the response to AG 1-80. Provide detailed information for each legal settlement amount contained in the chart including but not limited to case number, case name, nature of the legal claim, and reason for settlement.
- A-7. The requested information is being provided pursuant to a Petition for Confidential Protection. Those cases where the Company is contractually prohibited from disclosure in the absence of a court order have been left blank. The decision on whether or not to settle a case is based on a variety of factors, including the advice of counsel regarding exposure and likely outcome in court, which information is protected by the attorney client privilege and work-product doctrine.

Resp. Co.	Year	Amount	Case No.	Case Name	Nature of Claim
LGE	2010	85,911.08			
LGE	2010	3,750,000.00			
LGE	2011	462,500.00			
LGE	2011	80,000.00			
LGE	2012	175,000.00			
LGE	2013	450,000.00			

Resp. Co.	Year	Amount	Case No.	Case Name	Nature of Claim
LGE	2014	825,000.00			
LGE	2014	52,500.00			
LGE	2014	495,000.00			

CONFIDENTIAL INFORMATION REDACTED

LOUISVILLE GAS AND ELECTRIC COMPANY

CASE NO. 2014-00372

**Response to Attorney General's Supplemental Requests for Information
Dated February 6, 2015**

Question No. 8

Responding Witness: Christopher M. Garrett

Q-8. Reference the response to AG 1-94. Explain the large increase in expense for advertising category "Info/Safety 909" between 2011 and 2014 and also the reason for the forecast decrease in expense between 2014 and the test year.

A-8. 2011 vs 2014

The increase for advertising category "Info/Safety 909" between 2011 and 2014 of approximately \$389,000 is primarily due to increased spending and charging in 2014 as discussed below.

Focus on improving the customer experience by increasing the number of bill inserts to include as a supplement to our customer newsletters and direct mailings of "PowerLines," the Company's commercial, industrial, and economic development newsletter contributed to the increase. Additionally, the production of the Neighbor to Neighbor publication that goes to the fence line neighbors added to the increased costs. This variance was further compounded as similar costs were previously charged to account 930.1 in 2011 and are now being coded to account 909 in 2014 to better align with the Uniform System of Accounts, also detailed in the table below. The aggregate amount of these increased expenses and alternate coding between 2011 and 2014 totaled approximately \$228,000.

Additionally, there were increased retail marketing costs of approximately \$102,000 from 2011 to 2014 associated with updating phone directories and a paperless billing campaign.

2014 vs Test Year

The primary reason for the decrease is that the forecasted test year does not fully reflect the increases discussed above in the most recent calendar year.

LOUISVILLE GAS AND ELECTRIC COMPANY

CASE NO. 2014-00372

**Response to Attorney General's Supplemental Requests for Information
Dated February 6, 2015**

Question No. 9

Responding Witness: Christopher M. Garrett

Q-9. Reference the response to AG 1-94. Explain the large increase in expense for advertising category "Promotional 913" between 2013 and 2014 and also the reason for the forecast increase in expense between 2014 and the test year.

A-9. 2013 vs 2014

The increase in the "Promotional 913" advertising category between 2013 and 2014 of approximately \$62,000 is primarily due to \$20,000 paid to Building Industry Association and \$20,000 paid to Home Builders Association for advertising related expenses during the local Homearama. A change was made to begin coding these costs to account 913 to better align with the Uniform System of Accounts. These costs were previously charged to account 426.1, Donations in 2013.

2014 vs Test Year

The increase in "Promotional 913" advertising expense between 2014 and the test year of approximately \$188,000 is due to including \$250,000 of costs associated with the Louisville Sports Properties, formerly Nelligan Sports, contract in the forecasted test year. This increase is partially offset by the \$62,000 in Homearama advertising charges discussed above, which are budgeted to account 426.1, Donations in the forecasted test year.

All charges included in accounts 913 and 930.1 have been removed from recoverable operating expenses through electric and gas proforma adjustments totaling \$250,000 and \$435,000, respectively, in the forecasted test year.

LOUISVILLE GAS AND ELECTRIC COMPANY

CASE NO. 2014-00372

**Response to Attorney General's Supplemental Requests for Information
Dated February 6, 2015**

Question No. 10

Responding Witness: Christopher M. Garrett

Q-10. Reference response to AG 1-94. Explain the decrease in expense for advertising category "Institutional 930" between 2014 and the test year.

A-10. The decrease in advertising category "Institutional 930" between 2014 and the forecasted test year of approximately \$692,000 is due to the following issues:

As discussed in our response to Question No. 9, Louisville Sports Properties, formerly Nelligan Sports, expenses were budgeted in the forecasted test year to account 913. Actual expenses for this vendor in 2014 of approximately \$277,000 were recorded to account 930.1.

Increased spending for the vendor Scoppechio, formerly Creative Alliance, in 2014 resulted in approximately \$258,000 in variances to the forecasted test year. There were increased costs by this vendor related to the expansion of a general brand advertising campaign and additional costs resulting from negotiations with television networks, including the SEC network, to advertise during local college sporting events. In addition to this, there were increased payments for weather crawls that ran during restoration work.

Payments made to the KHSAA and Louisville Professional Baseball of approximately \$77,000 were budgeted to account 426.1, Donations in the forecasted test period.

All charges included in accounts 913 and 930.1 have been removed from recoverable operating expenses through electric and gas proforma adjustments totaling \$250,000 and \$435,000, respectively, in the forecasted test year.

LOUISVILLE GAS AND ELECTRIC COMPANY

CASE NO. 2014-00372

**Response to Attorney General's Supplemental Requests for Information
Dated February 6, 2015**

Question No. 11

Responding Witness: Christopher M. Garrett

Q-11. Reference the response to AG 1-94. Provide a description of each category of advertising expense shown on the attachment to the response.

A-11. 909 Informational and instructional advertising expenses for activities that primarily convey information as to what the utility urges or suggests customers should do in utilizing electric or gas service to protect health and safety, to encourage environmental protection, to utilize their electric or gas equipment safely and economically, or to conserve electric energy or natural gas.

913 Promotional advertising expenses incurred in advertising designed to promote or retain the use of utility service, except advertising the sale of merchandise by the utility.

930.1 General advertising expenses incurred in advertising and related activities.

All descriptions above are per the Uniform System of Accounts.

LOUISVILLE GAS AND ELECTRIC COMPANY

CASE NO. 2014-00372

**Response to Attorney General's Supplemental Requests for Information
Dated February 6, 2015**

Question No. 12

Responding Witness: D. Ralph Bowling

- Q-12. Reference the response to AG 1-155. For the period 2012, 2014, the base year and the test year, please provide the title and number of positions by generating station, at headquarters and in total.
- A-12. See attached for a listing of employees as of December 31, 2012 and 2014, the end of the base year (February 28, 2015) and the end of the test year (June 30, 2016).

Plant/Headquarter	Job Title	12/31/2012
General Manager - Ghent	Assistant Coal Yard Supervisor	5
	Auxiliary Operator	12
	Chemical Engineer I	1
	Chief Electrician (E)	2
	Chief Electrician (I)	3
	Chief Mechanic	4
	Civil Engineer I	1
	Coal Equipment Operator	5
	Coal Yard Supervisor	1
	Electrical Engineer II	1
	General Manager - Ghent	1
	Grp Ldr - Engineering	1
	Health/Safety Specialist	1
	Laboratory Technician I	1
	Laboratory Technician II	1
	Lead Engineer	1
	Maintenance Coordinator	1
	Maintenance Planner	4
	Maintenance Technician A (E)	10
	Maintenance Technician A (I)	14
	Maintenance Technician A (M)	27
	Maintenance Technician B (M)	4
	Maintenance Technician C (E)	2
	Maintenance Technician C (I)	1
	Maintenance Technician C (M)	5
	Manager - Production	1
	Mgr Maint - Pwr Gen	1
	P.P. Environmental Supv	1
	P.P. Shift Supervisor	12
	Plant Maint Admin Assistant	1
	Semi-Skilled Laborer	3
	Sr Chemist	1
	Sr Electrical Engineer	1
	Sr Laboratory Technician	3
	Sr Secretary	1
	Supervisor - Maintenance	3
	Supervisor - Production	3
	Supvr. Building And Grounds	1
	Unit Operator	20
	Unit Operator Assistant	29
General Manager - Ghent Total		190
General Manager - Green River	Assistant Coal Yard Supervisor	1
	Chemist III	1
	Chief Electrician	1
	Chief Mechanic	1
	Coal Equipment Operator	2
	Coal Yard Supervisor	1
	Electrical Engineer III	1
	General Manager - Green River	1
	Health/Safety Specialist	1
	Lead Electrician (I)	1
	Lead Mechanic	1
	Maintenance Technician A (E)	3
	Maintenance Technician A (M)	1
	Maintenance Technician B (M)	1
	Manager - Production	1
	Mgr Maint - Pwr Gen	1
	P.P. Senior Clerk	1
	P.P. Shift Supervisor	6
	Production Materials Supvr.	1
	Unit Operator	11
Unit Operator Assistant	3	
General Manager - Green River Total		41

Plant/Headquarter	Job Title	12/31/2012
General Manager - Tyrone/Brown	Assistant Coal Yard Supervisor	2
	Chemical Engineer I	1
	Chief Electrician (CT)	1
	Chief Electrician (E)	1
	Chief Mechanic	2
	Coal Equipment Operator	6
	Coal Yard Supervisor	1
	Control Specialist	1
	Electrical Engineer II	1
	General Manager - Tyrone/Brown	1
	Health/Safety Specialist	1
	Lead Electrician (E)	1
	Lead Electrician (I)	1
	Lead Mechanic	5
	Maintenance Technician A (Ct)	9
	Maintenance Technician A (E)	4
	Maintenance Technician A (I)	7
	Maintenance Technician A (M)	13
	Maintenance Technician B (Ct)	1
	Maintenance Technician B (E)	4
	Maintenance Technician B (M)	3
	Maintenance Technician C (I)	1
	Manager - Production	1
	Mechanical Engineer II	1
	Mgr Maint - Pwr Gen	1
	Mgr Tyrone Operations	1
	Outage Coordinator	1
	P.P. Results Coordinator	1
	P.P. Senior Clerk	2
	P.P. Shift Supervisor	10
	Production Support Leader	1
	Resource Planner	2
	Semi-Skilled Laborer	5
	Sr Chemist	1
	Sr Laboratory Technician	2
	Sr Mechanical Engineer	2
	Sr Secretary	1
	Supervisor - Maintenance	2
	Supervisor - Production	3
	Unit Operator	20
	Unit Operator Assistant	10
	Unit Operator Asst-Grdfathered	2
General Manager - Tyrone/Brown Total		136
Gen Mgr Cane Run & Comb Turb	Assistant Operator - Cane Run	2
	Chemist III	1
	Gen Mgr Cane Run & Comb Turb	1
	I&E Technician A	12
	IE Maintenance Planner	1
	Laboratory Assistant	1
	Laboratory Technician	4
	Lead Material Handler Operator	3
	Maintenance Coordinator	1
	Maintenance Leader	4
	Maintenance Planner	2
	Manager - Production	1
	Material Handling Leader	1
	Mech Repair Technician A	11
	Mgr Maint - Pwr Gen	1
	Operator - Cane Run	36
	Operator - SPP	3
	Production Leader	11
	Production Support Leader	1
	Production Supv/Compliance	1
	Sr Control Specialist	1
	Sr Engineer	1
	Sr Secretary	1
	Supervisor - Maintenance	2
	Supervisor - Production	1
	Turbine Operator-Mechanic	4
	Gen Mgr Cane Run & Comb Turb Total	

Plant/Headquarter	Job Title	12/31/2012
General Manager - Mill Creek	Assistant Operator - Plant MC	8
	Auxiliary Operator - Plant	8
	Bldg Maint Tech A	1
	Bldg Maintenance Tech A - MC	3
	Civil Engineer I	1
	Control Specialist	1
	Electrical Engineer I	1
	General Manager - Mill Creek	1
	I&E Technician A	21
	I&E Technician B	3
	Laboratory Leader	1
	Laboratory Technician	11
	Lead Engineer	1
	Lead Material Handler Operator	9
	Maintenance Coordinator	1
	Maintenance Leader	13
	Maintenance Planner	4
	Manager - Production	1
	Material Handling Leader	2
	Material Handling Operator	2
	Materials Handling Supervisor	1
	Mech Repair Technician A	20
	Mech Repair Technician B	4
	Mechanical Engineer I	1
	Mechanical Engineer II	1
	Mgr Maint - Pwr Gen	1
	Operator - Plant MC	34
	Operator - Yard	19
	Outage Coordinator	1
	P.P. Environ Coord II	1
	Production Leader	12
	Production Support Leader	4
	Production Supv/Compliance	1
	Sr Chemical Engineer	1
	Sr Control Specialist	1
	Sr Mechanical Engineer	1
	Sr Secretary	1
	Station Helper - Plant	5
	Supervisor - Maintenance	3
	Supervisor - Production	1
General Manager - Mill Creek Total		206
General Manager - Trimble	Assistant Operator-Trimble Co	3
	Auxiliary Operator-Trimble Co	7
	Chemical Engineer III	1
	Civil Engineer I	1
	Control Specialist	1
	Electrical Engineer II	1
	General Manager - Trimble	1
	Health/Safety Specialist	1
	I&E Technician A	18
	I&E Technician B	8
	I&E Technician Helper	1
	Laboratory Technician	5
	Laboratory Trainee	1
	Lead Material Handler Operator	6
	Maintenance Leader	12
	Manager - Production	1
	Material Handling Leader	1
	Material Handling Operator	1
	Mech Repair Technician A	8
	Mech Repair Technician B	4
	Mech Repair Technician Helper	3
	Mechanical Engineer I	2
	Mechanical Engineer II	1
	Mgr Maint - Pwr Gen	1
	Operator - Trimble County	27
	Outage Coordinator	1
	P.P. Environ Coord I	1
	P.P. Environ Coord III	1
	Production Leader	8
	Production Support Leader	1
	Records Coordinator - B	1
	Resource Planner	1
	Sr Control Specialist	1
	Sr Mechanical Engineer	1
	Sr Secretary	1
	Sr Training Coordinator	1
	Station Helper -Trimble County	9
	Supervisor - Maintenance	2
	Supervisor - Production	1
	General Manager - Trimble Total	

Plant/Headquarter	Job Title	12/31/2012
Headquarter	Account Manager II Municipals	1
	Administrative Assistant	1
	Assoc Market Policy Analyst	1
	Chemical Engineer I	1
	Chief Operating Officer	1
	Civil Engineer II	2
	Civil Engineer III	1
	Commercial Admin Assistant	5
	Contract Administrator III	7
	Contract Coordinator	1
	Controls Specialist – Gen Srvs	1
	Data Records Coordinator	2
	Department Admin Assistant	1
	Dept/Div Secretary	1
	Design Drafter A	3
	Dir Business Development	1
	Dir Corp Fuels & By-Products	1
	Dir Engy Pln/Analysis/Forecast	1
	Dir Generation Services	1
	Dir Marketing	1
	Dir Power Supply	1
	Dir Project Engineering	1
	Dir Pwr Gen Commercial Ops	1
	Document Management Specialist	1
	Economic Analyst	1
	Electrical Engineer II	2
	Electrical Engineer III	2
	Energy Analyst I	1
	Energy Analyst II	1
	Energy Analyst III	1
	Energy Mkt/IT Bus Project Ldr	1
	Energy Trader	6
	Field Material Services Coord	1
	Field Material Services Coord	6
	Fin Eng & Model Analyst	1
	Fuels Accounting Analyst III	2
	Fuels Acct & Admin Assoc III	2
	Fuels Analyst	1
	Fuels Coord II	2
	G.O. Senior Clerk	1
	Generation Dispatcher	6
	Grp Ldr - Engineering	2
	Health & Safety Spclst III	4
	Industrial/Site Relations Mgr	1
	Inventory Attendant A-MC	2
	Lead Engineer	6
	Market Compliance Analyst	1
	Market Policy Analyst	1
	Mechanical Engineer I	3
	Mechanical Engineer II	2
	Mechanical Engineer III	2
	Mgr Commercial Operations	5
	Mgr Compliance & Document Mgmt	1
	Mgr Contracts/Mjr Capital Proj	1
	Mgr Economic Analysis	1
	Mgr Fleet Ops Perf & Reliab	1
	Mgr Fuels Acctg and Admin	1
	Mgr Fuels Risk Management	1
	Mgr Generation Engineering	1

Plant/Headquarter	Job Title	12/31/2012
	Mgr Generation Planning	1
	Mgr Hourly Trading	1
	Mgr LG&E And KU Fuels	1
	Mgr Major Capital Projects	5
	Mgr Market Compliance	1
	Mgr of Trading	1
	Mgr Reg Generation Dispatch Op	1
	Mgr Research & Development	1
	Mgr Sales Analysis & Forecast	1
	Mgr Turbine-Generator Maint	1
	Mining Engineer III	1
	Office & Special Prjcts Supvr	1
	P.P. Clerk II	1
	P.P. Senior Clerk	2
	Planning Analyst I	1
	Planning Analyst II	4
	Principal Engineer	1
	Production Materials Supvr.	3
	Project Coor-Major Cap Project	20
	Project Planning Dev Coord	1
	R&D Engineer/Scientist - Ph.D.	1
	Records Coordinator - A	3
	Scheduler	1
	Scientist I	1
	Sr Asst to Chief Operating Officer	1
	Sr Asst to VP Power Production	1
	Sr Asst To VP Transmission/Gen	1
	Sr Asst VP Eng Supl & Analysis	1
	Sr Business Development Analyst	1
	Sr By Prod & Indust Coal Coord	1
	Sr Civil Engineer	2
	Sr Compliance Engineer	1
	Sr Controls Spec – Gen Srvs	2
	Sr Dispatcher	1
	Sr Drafting and Design Tech	2
	Sr Electrical Engineer	3
	Sr Energy Analyst	1
	Sr Engy Mktg Business Analyst	1
	Sr Fuels & Transportation Admi	1
	Sr Fuels Administrator	1
	Sr Labor Distribution Clerk	1
	Sr Laboratory Technician	4
	Sr Market Compliance Analyst	1
	Sr Market Policy Analyst	1
	Sr Mechanical Engineer	3
	Sr Metallurgical Engineer	1
	Sr Planning Analyst	1
	Sr Scientist	3
	Sr Scientist - Plnt Cycle Chem	1
	Sr Secretary	4
	Sr Trader	1
	Storeroom Technician A	6
	Supervisor Drafting Services	1
	System Laboratory Supervisor	1
	Trainee A	1
	Turbine-Generator Specialist	2
	VP Energy Supply and Analysis	1
	VP Power Production	1
	VP Transmission/Generation Svc	1
Total Headquarter		222
Total Headcount		1,049

Plant/Headquarter	Job Title	12/31/2014
General Manager - Ghent	Administrative Coordinator	1
	Auxiliary Operator	15
	Chemical Engineer II	1
	Chief Electrician (E)	2
	Chief Electrician (I)	3
	Chief Mechanic	5
	Civil Engineer II	1
	Coal Equipment Operator	4
	Coal Yard Supervisor	5
	Control Specialist	1
	Electrical Engineer I	1
	Electrical Engineer II	1
	General Manager - Ghent	1
	Grp Ldr - Engineering	1
	Laboratory Technician I	1
	Laboratory Technician II	2
	Lead Electrician (E)	3
	Lead Electrician (I)	2
	Lead Engineer	1
	Lead Mechanic	3
	Maintenance Coordinator	1
	Maintenance Planner	5
	Maintenance Technician A (E)	7
	Maintenance Technician A (I)	12
	Maintenance Technician A (M)	25
	Maintenance Technician B (E)	4
	Maintenance Technician B (I)	2
	Maintenance Technician B (M)	5
	Maintenance Technician C (E)	3
	Maintenance Technician C (I)	3
	Maintenance Technician C (M)	5
	Manager - Production	1
	Mechanical Engineer I	2
	Mechanical Engineer III	1
	Mgr Ghent Env Project Coord	1
	Mgr Maint - Pwr Gen	1
	Outage Coordinator	1
	P.P. Clerk II	1
	P.P. Environmental Supv	1
	P.P. Senior Clerk	1
	P.P. Shift Supervisor	15
	Plant Maint Admin Assistant	1
	Semi-Skilled Laborer	4
	Sr Chemist	1
	Sr Electrical Engineer	1
	Sr Laboratory Technician	3
	Sr Safety Specialist	1
Supervisor - Maintenance	3	
Supervisor - Production	2	
Trainee A (Operations)	4	
Unit Operator	22	
Unit Operator Assistant	24	
General Manager - Ghent Total		217
General Manager - Green River	Acting Manager Production	1
	Acting Supervisor - Production	1
	Assistant Coal Yard Supervisor	1
	Chief Electrician	2
	Chief Mechanic	1
	Coal Equipment Operator	2
	Coal Yard Supervisor	1
	General Manager - Green River	1
	Lead Mechanic	1
	Maintenance Technician A (E)	3
	Maintenance Technician A (M)	1
	Maintenance Technician B (M)	1
	Manager - Production	1
	Mgr Maint - Pwr Gen	1
	P.P. Shift Supervisor	5
	Safety Specialist III	1
	Sourcing Assistant - Sr.	1
	Unit Operator	11
	Unit Operator Assistant	3
Warehouse Supvr.	1	
General Manager - Green River Total		40

Plant/Headquarter	Job Title	12/31/2014	
General Manager - Tyrone/Brown	Assistant Coal Yard Supervisor	2	
	Auxiliary Operator	5	
	Chief Electrician (CT)	1	
	Chief Electrician (E)	1	
	Chief Mechanic	2	
	Coal Equipment Operator	6	
	Coal Yard Supervisor	1	
	General Manager - Tyrone/Brown	1	
	Lead Electrician (E)	1	
	Lead Electrician (I)	1	
	Lead Mechanic	5	
	Maintenance Coordinator	1	
	Maintenance Technician A (E)	7	
	Maintenance Technician A (I)	4	
	Maintenance Technician A (M)	13	
	Maintenance Technician B (I)	1	
	Maintenance Technician C (E)	1	
	Maintenance Technician C (I)	1	
	Maintenance Technician C (M)	6	
	Manager - Production	1	
	Mechanical Engineer I	1	
	Mechanical Engineer II	1	
	Mgr Maint - Pwr Gen	1	
	Mgr Tyrone Operations	1	
	O&M Technician A (Ct)	9	
	Outage Coordinator	1	
	P.P. Clerk I	1	
	P.P. Results Coordinator	1	
	P.P. Senior Clerk	2	
	P.P. Shift Supervisor	10	
	Production Support Leader	1	
	Production Supv/Compliance	1	
	Resource Planner	2	
	Semi-Skilled Laborer	4	
	Sr Chemist	1	
	Sr Laboratory Technician	2	
	Sr Mechanical Engineer	2	
	Sr Safety Specialist	1	
	Sr Secretary	1	
	Supervisor - Maintenance	2	
	Supervisor - Production	2	
	Unit Operator	23	
	Unit Operator Assistant	7	
Unit Operator Asst-Grdfathered	1		
General Manager - Tyrone/Brown Total		139	
Gen Mgr Cane Run & Comb Turb	Engineer II	1	
	Gen Mgr Cane Run & Comb Turb	1	
	I&E Technician A	10	
	IE Maintenance Planner	1	
	Laboratory Technician	6	
	Lead Mat Handling Operator	4	
	Maintenance Coordinator	1	
	Maintenance Leader	2	
	Maintenance Planner	3	
	Manager - Production	1	
	Material Handling Leader	1	
	Mech Repair Technician A	7	
	Mechanical Engineer I	1	
	Mgr Ops & Maint (CT&CCGT)	1	
	Operations & Maintenance Ldr	6	
	Operator - Cane Run	22	
	Operator - SPP	3	
	Ops & Maint Tech A (CT)	18	
	Ops & Maint Tech B (CT)	3	
	Production Leader	5	
	Production Support Leader	1	
	Production Supv/Compliance	1	
	Sr Chemist	1	
	Sr Control Specialist	2	
	Sr Safety Specialist	1	
	Sr Secretary	1	
	Supervisor - Maintenance	2	
	Supervisor - Production	2	
	Turbine Operator-Mechanic	4	
	Gen Mgr Cane Run & Comb Turb Total		112

Plant/Headquarter	Job Title	12/31/2014	
General Manager - Mill Creek	Assistant Operator - Plant MC	7	
	Auxiliary Operator - Plant MC	11	
	Bldg Maintenance Tech A - MC	3	
	Chemical Engineer III	1	
	Civil Engineer II	1	
	Civil Engineer III	1	
	Electrical Engineer II	1	
	General Manager - Mill Creek	1	
	Grp Ldr - Engineering	1	
	I&E Technician A	21	
	I&E Technician B	3	
	I&E Technician Helper	1	
	Laboratory Assistant	2	
	Laboratory Leader	1	
	Laboratory Technician	7	
	Lead Mat Handling Operator	10	
	Maintenance Coordinator	1	
	Maintenance Leader	14	
	Maintenance Planner	5	
	Manager - Production	1	
	Material Handling Leader	2	
	Materials Handling Supervisor	1	
	Mech Repair Technician A	16	
	Mech Repair Technician B	5	
	Mechanical Engineer I	1	
	Mechanical Engineer II	1	
	Mgr Maint - Pwr Gen	1	
	Operator - Plant MC	31	
	Operator - Yard	18	
	Outage Coordinator	1	
	P.P. Environ Coord III	1	
	Production Leader	14	
	Production Support Leader	3	
	Production Supv/Compliance	1	
	Sr Chemical Engineer	1	
	Sr Control Specialist	2	
	Sr Mechanical Engineer	1	
	Sr Safety Specialist	1	
	Sr Secretary	1	
	Station Helper - Plant MC	5	
	Supervisor - Maintenance	4	
	Supervisor - Production	1	
	General Manager - Mill Creek Total		205
	General Manager - Trimble	Assistant Operator-Trimble Co	4
		Auxiliary Operator-Trimble Co	14
		Chemical Engineer I	1
		Chemical Engineer III	1
Civil Engineer I		1	
Control Specialist		2	
Dept/Div Secretary		1	
Electrical Engineer III		2	
General Manager - Trimble		1	
Grp Ldr - Engineering		1	
I&E Technician A		25	
I&E Technician B		1	
Laboratory Assistant		1	
Laboratory Technician		5	
Lead Engineer		1	
Lead Mat Handling Operator		4	
Maintenance Coordinator		1	
Maintenance Leader		8	
Maintenance Planner		7	
Manager - Production		1	
Material Handling Leader		2	
Mech Repair Technician A		10	
Mech Repair Technician B		5	
Mechanical Engineer I		2	
Mechanical Engineer II		2	
Mgr Maint - Pwr Gen		1	
Operator - Trimble County		23	
Outage Coordinator		1	
P.P. Environ Coord II		1	
P.P. Environ Coord III		1	
Production Leader		8	
Production Support Leader		3	
Safety Specialist III		1	
Sr Chemical Engineer		1	
Sr Control Specialist	1		
Sr Secretary	1		
Sr Training Coordinator	2		
Station Helper -Trimble County	7		
Supervisor - Maintenance	2		
Supervisor - Production	2		
General Manager - Trimble Total		158	

Plant/Headquarter	Job Title	12/31/2014
Headquarter	Account Manager II Municipals	1
	Assoc Trader	2
	Boiler Data Specialist	1
	Boiler Welding QA/QC Spec	1
	Buyer I	2
	Buyer II	4
	Buyer III	5
	Chemical Engineer I	1
	Civil Engineer I	3
	Civil Engineer III	2
	Compliance Engineer III	1
	Consumer Behavior Analyst	1
	Contract Administrator II	6
	Contract Administrator III	6
	Contract Coordinator	1
	Controls Specialist - Gen Svcs	2
	CSS Administrative Coordinator	1
	Data Records Coordinator	2
	Dept/Div Secretary	3
	Design Drafter A	3
	Dir Business Development	1
	Dir Corp Fuels & By-Products	1
	Dir Engy Pln/Analysis/Forecast	1
	Dir Fleet Maint Perform&Reliab	1
	Dir Generation Services	1
	Dir Marketing	1
	Dir Power Supply	1
	Dir Project Engineering	1
	Dir Pwr Gen Commercial Ops	1
	Document Management Spec II	1
	Drafting and Design Tech II	1
	Electrical Engineer III	3
	Energy Analyst I	1
	Energy Analyst III	3
	Energy Mkt/IT Bus Project Ldr	1
	Fin Eng & Model Analyst	1
	Fuels Accounting Analyst III	2
	Fuels Acct & Admin Assoc III	2
	Fuels Analyst	1
	Fuels Coord II	2
	G.O. Senior Clerk	1
	Generation Dispatcher	1
	Grp Ldr - Engineering	2
	Grp Ldr Research & Development	1
	Industrial/Site Relations Mgr	1
	Inventory Attendant A-MC	2
	Lead Engineer	4
	Lead Proj Coord-Major Cap Proj	1
	Market Compliance Analyst	1
	Market Policy Analyst	1
	Mechanical Engineer II	4
	Mechanical Engineer III	1
	Mgr Commercial Operations	5
	Mgr Compliance & Document Mgmt	1
	Mgr Contracts/Mjr Capital Proj	1
	Mgr Economic Analysis	1
	Mgr Fleet Ops Perf & Reliab	1
	Mgr Fuels Acctg and Admin	1
	Mgr Fuels Risk Management	1
	Mgr Fuels Technical Services	1
	Mgr Generation Engineering	1
	Mgr Generation Planning	1
	Mgr Hourly Trading	1
	Mgr LG&E And KU Fuels	1
	Mgr Major Capital Projects	5
	Mgr Market Compliance	1
	Mgr Reg Generation Dispatch Op	1
	Mgr Sales Analysis & Forecast	1
	Mgr Turbine-Generator Maint	1
	Office & Special Prjcts Supvr	1

Plant/Headquarter	Job Title	12/31/2014
	Planning Analyst II	2
	Planning Analyst III	3
	Principal Engineer	2
	Project Coord-Major Cap Project	18
	Project Planning Dev Coord	1
	R&D Engineer/Scientist - Ph.D.	2
	Records Coordinator - A	3
	Safety Specialist II	1
	Safety Specialist III	3
	Scientist I	1
	Scientist II	1
	Service Shop Coordinator	1
	Sourcing Assistant - Sr.	6
	Sourcing Assistant II	1
	Sr Asst to VP Power Production	1
	Sr Asst To VP Transmission/Gen	1
	Sr Asst VP Eng Supl & Analysis	1
	Sr By Prod & Indust Coal Coord	1
	Sr Civil Engineer	2
	Sr Dispatcher	6
	Sr Drafting and Design Tech	1
	Sr Economic Analyst	1
	Sr Electrical Engineer	5
	Sr Engy Mktg Business Analyst	1
	Sr Fuels & Transportation Admi	1
	Sr Fuels Administrator	1
	Sr Labor Distribution Clerk	3
	Sr Laboratory Technician	4
	Sr Market Compliance Analyst	1
	Sr Market Policy Analyst	1
	Sr Mechanical Engineer	2
	Sr Metallurgical Engineer	1
	Sr Planning Analyst	1
	Sr Scheduler Power & Gas	1
	Sr Scientist	3
	Sr Scientist - Plnt Cycle Chem	1
	Sr Secretary	5
	Sr Trader	5
	Storeroom Technician A	5
	Supervisor Drafting Services	1
	System Laboratory Supervisor	1
	Trainee A	1
	Turbine-Generator Specialist	2
	VP Energy Supply and Analysis	1
	VP Power Production	1
	VP Transmission/Generation Svc	1
	Warehouse Supvr.	4
Total Headquarter		233
Total headcount		1,104

Plant/Headquarter	Job Title	2/28/2015
General Manager - Ghent	Administrative Coordinator	1
	Auxiliary Operator	15
	Chemical Engineer II	1
	Chief Electrician (E)	2
	Chief Electrician (I)	3
	Chief Mechanic	5
	Civil Engineer II	1
	Coal Equipment Operator	4
	Coal Yard Supervisor	5
	Control Specialist	1
	Electrical Engineer I	2
	Electrical Engineer II	1
	General Manager - Ghent	1
	Grp Ldr - Engineering	1
	Laboratory Technician I	1
	Laboratory Technician II	2
	Lead Electrician (E)	3
	Lead Electrician (I)	2
	Lead Engineer	1
	Lead Mechanic	3
	Maintenance Coordinator	1
	Maintenance Planner	5
	Maintenance Technician A (E)	8
	Maintenance Technician A (I)	12
	Maintenance Technician A (M)	25
	Maintenance Technician B (E)	4
	Maintenance Technician B (I)	2
	Maintenance Technician B (M)	5
	Maintenance Technician C (E)	3
	Maintenance Technician C (I)	3
	Maintenance Technician C (M)	5
	Manager - Production	1
	Mechanic	2
	Mechanical Engineer I	4
	Mechanical Engineer III	1
	Mgr Ghent Env Project Coord	1
	Mgr Maint - Pwr Gen	1
	Outage Coordinator	1
	P.P. Clerk II	1
	P.P. Environmental Supv	1
	P.P. Senior Clerk	1
	P.P. Shift Supervisor	15
	Plant Maint Admin Assistant	1
	Semi-Skilled Laborer	4
	Sr Chemist	1
	Sr Electrical Engineer	1
	Sr Laboratory Technician	3
Sr Safety Specialist	1	
Supervisor - Maintenance	3	
Supervisor - Production	2	
Trainee A (Operations)	4	
Unit Operator	21	
Unit Operator Assistant	24	
General Manager - Ghent Total		222
General Manager - Green River	Acting Manager Production	1
	Acting Supervisor - Production	1
	Assistant Coal Yard Supervisor	1
	Chief Electrician	2
	Chief Mechanic	1
	Coal Equipment Operator	2
	Coal Yard Supervisor	1
	General Manager - Green River	1
	Lead Mechanic	1
	Maintenance Technician A (E)	3
	Maintenance Technician A (M)	1
	Maintenance Technician B (M)	1
	Manager - Production	1
	Mgr Maint - Pwr Gen	1
	P.P. Shift Supervisor	5
	Safety Specialist III	1
	Sourcing Assistant - Sr.	1
	Unit Operator	11
	Unit Operator Assistant	3
Warehouse Supvr.	1	
General Manager - Green River Total		40

Plant/Headquarter	Job Title	2/28/2015	
General Manager - Tyrone/Brown	Assistant Coal Yard Supervisor	2	
	Auxiliary Operator	5	
	Chief Electrician (CT)	1	
	Chief Electrician (E)	1	
	Chief Mechanic	2	
	Coal Equipment Operator	6	
	Coal Yard Supervisor	1	
	General Manager - Tyrone/Brown	1	
	Lead Electrician (E)	1	
	Lead Electrician (I)	1	
	Lead Mechanic	5	
	Maintenance Coordinator	1	
	Maintenance Technician A (E)	10	
	Maintenance Technician A (I)	4	
	Maintenance Technician A (M)	13	
	Maintenance Technician B (I)	1	
	Maintenance Technician C (E)	1	
	Maintenance Technician C (I)	1	
	Maintenance Technician C (M)	6	
	Manager - Production	1	
	Mechanical Engineer I	1	
	Mechanical Engineer II	1	
	Mgr Maint - Pwr Gen	1	
	Mgr Tyrone Operations	1	
	O&M Technician A (Ct)	9	
	Outage Coordinator	1	
	P.P. Clerk I	1	
	P.P. Results Coordinator	1	
	P.P. Senior Clerk	2	
	P.P. Shift Supervisor	10	
	Production Support Leader	1	
	Production Supv/Compliance	1	
	Resource Planner	2	
	Semi-Skilled Laborer	4	
	Sr Chemist	1	
	Sr Laboratory Technician	2	
	Sr Mechanical Engineer	2	
	Sr Safety Specialist	1	
	Sr Secretary	1	
	Supervisor - Maintenance	2	
	Supervisor - Production	2	
	Trainer	1	
	Unit Operator	23	
	Unit Operator Assistant	7	
	Unit Operator Asst-Grdfathered	1	
	General Manager - Tyrone/Brown Total		143
	Gen Mgr Cane Run & Comb Turb	Engineer II	1
Gen Mgr Cane Run & Comb Turb		1	
I&E Technician A		10	
IE Maintenance Planner		1	
Laboratory Technician		6	
Lead Mat Handling Operator		4	
Maintenance Coordinator		3	
Maintenance Leader		2	
Maintenance Planner		3	
Manager - Production		1	
Material Handling Leader		1	
Mech Repair Technician A		7	
Mechanical Engineer I		1	
Mgr Ops & Maint (CT&CCGT)		1	
Operations & Maintenance Ldr		6	
Operator - Cane Run		22	
Operator - SPP		3	
Ops & Maint Tech A (CT)		18	
Ops & Maint Tech B (CT)		3	
Production Leader		5	
Production Support Leader		1	
Production Supv/Compliance		1	
Sr Chemist		1	
Sr Control Specialist		2	
Sr Safety Specialist		1	
Sr Secretary		1	
Supervisor - Maintenance		2	
Supervisor - Production		2	
Technical Trainer		1	
Turbine Operator-Mechanic		4	
Gen Mgr Cane Run & Comb Turb Total		115	

Plant/Headquarter	Job Title	2/28/2015	
General Manager - Mill Creek	Assistant Operator - Plant MC	7	
	Auxiliary Operator - Plant MC	11	
	Bldg Maintenance Tech A - MC	3	
	Chemical Engineer III	1	
	Civil Engineer II	1	
	Civil Engineer III	1	
	Electrical Engineer II	1	
	General Manager - Mill Creek	1	
	Grp Ldr - Engineering	1	
	I&E Technician A	21	
	I&E Technician B	3	
	I&E Technician Helper	1	
	Laboratory Assistant	2	
	Laboratory Leader	1	
	Laboratory Technician	7	
	Lead Mat Handling Operator	10	
	Maintenance Coordinator	1	
	Maintenance Leader	14	
	Maintenance Planner	5	
	Manager - Production	1	
	Material Handling Leader	2	
	Materials Handling Supervisor	1	
	Mech Repair Technician A	16	
	Mech Repair Technician B	5	
	Mechanical Engineer I	1	
	Mechanical Engineer II	1	
	Mgr Maint - Pwr Gen	1	
	Operator - Plant MC	31	
	Operator - Yard	18	
	Outage Coordinator	1	
	P.P. Environ Coord III	1	
	Production Leader	14	
	Production Support Leader	3	
	Production Supv/Compliance	1	
	Sr Chemical Engineer	1	
	Sr Control Specialist	2	
	Sr Mechanical Engineer	1	
	Sr Safety Specialist	1	
	Sr Secretary	1	
	Station Helper - Plant MC	5	
	Supervisor - Maintenance	4	
	Supervisor - Production	1	
	General Manager - Mill Creek Total		205
	General Manager - Trimble	Assistant Operator-Trimble Co	5
		Auxiliary Operator-Trimble Co	14
		Chemical Engineer I	1
		Chemical Engineer III	1
Civil Engineer I		1	
Control Specialist		2	
Dept/Div Secretary		1	
Electrical Engineer III		2	
General Manager - Trimble		1	
Grp Ldr - Engineering		1	
I&E Technician A		26	
I&E Technician B		1	
Laboratory Assistant		1	
Laboratory Technician		5	
Lead Engineer		1	
Lead Mat Handling Operator		4	
Maintenance Coordinator		1	
Maintenance Leader		8	
Maintenance Planner		7	
Manager - Production		1	
Material Handling Leader		2	
Mech Repair Technician A		10	
Mech Repair Technician B		5	
Mechanical Engineer I		2	
Mechanical Engineer II		2	
Mgr Maint - Pwr Gen		1	
Operator - Trimble County		23	
Outage Coordinator		1	
P.P. Environ Coord II		1	
P.P. Environ Coord III		1	
Production Leader		8	
Production Support Leader		3	
Safety Specialist III		1	
Sr Chemical Engineer		1	
Sr Control Specialist	1		
Sr Secretary	1		
Sr Training Coordinator	2		
Station Helper -Trimble County	7		
Supervisor - Maintenance	2		
Supervisor - Production	2		
General Manager - Trimble Total		160	

Plant/Headquarter	Job Title	2/28/2015
Headquarter	Account Manager II Municipals	1
	Assoc Trader	2
	Boiler Data Specialist	1
	Boiler Welding QA/QC Spec	1
	Buyer I	2
	Buyer II	4
	Buyer III	5
	Chemical Engineer I	1
	Civil Engineer I	4
	Civil Engineer III	2
	Commercial Ops Analyst	1
	Compliance Engineer III	2
	Consumer Behavior Analyst	1
	Contract Administrator II	6
	Contract Administrator III	6
	Contract Coordinator	1
	Controls Specialist - Gen Svcs	2
	CSS Administrative Coordinator	1
	Data Records Coordinator	2
	Dept/Div Secretary	3
	Design Drafter A	3
	Dir Business Development	1
	Dir Corp Fuels & By-Products	1
	Dir Engy Pln/Analysis/Forecast	1
	Dir Fleet Maint Perform&Reliab	1
	Dir Generation Services	1
	Dir Marketing	1
	Dir Power Supply	1
	Dir Project Engineering	1
	Dir Pwr Gen Commercial Ops	1
	Document Management Spec II	1
	Drafting and Design Tech II	2
	Electrical Engineer III	4
	Energy Analyst I	1
	Energy Analyst III	3
	Energy Mkt/IT Bus Project Ldr	1
	Fin Eng & Model Analyst	1
	Fuels Accounting Analyst III	2
	Fuels Acct & Admin Assoc III	2
	Fuels Analyst	2
	Fuels Coord II	2
	G.O. Senior Clerk	1
	Generation Dispatcher	1
	Grp Ldr - Engineering	2
	Grp Ldr Research & Development	1
	Industrial/Site Relations Mgr	1
	Inventory Attendant A-MC	2
	Lead Engineer	5
	Lead Proj Coord-Major Cap Proj	1
	Market Compliance Analyst	1
	Market Policy Analyst	1
	Mechanical Engineer II	4
	Mechanical Engineer III	1

Plant/Headquarter	Job Title	2/28/2015
	Mgr Commercial Operations	5
	Mgr Compliance & Document Mgmt	1
	Mgr Contracts/Mjr Capital Proj	1
	Mgr Economic Analysis	1
	Mgr Fleet Ops Perf & Reliab	1
	Mgr Fuels Acctg and Admin	1
	Mgr Fuels Risk Management	1
	Mgr Fuels Technical Services	1
	Mgr Generation Engineering	1
	Mgr Generation Planning	1
	Mgr Hourly Trading	1
	Mgr LG&E And KU Fuels	1
	Mgr Major Capital Projects	5
	Mgr Market Compliance	1
	Mgr Reg Generation Dispatch Op	1
	Mgr Sales Analysis & Forecast	1
	Mgr Turbine-Generator Maint	1
	Office & Special Prjcts Supvr	1
	Planning Analyst II	2
	Planning Analyst III	3
	Principal Engineer	2
	Project Coor-Major Cap Project	19
	Project Planning Dev Coord	1
	R&D Engineer/Scientist - Ph.D.	2
	Records Coordinator - A	3
	Safety Specialist II	1
	Safety Specialist III	3
	Scientist I	1
	Scientist II	1
	Service Shop Coordinator	1
	Sourcing Assistant - Sr.	6
	Sourcing Assistant II	1
	Sr Asst to VP Power Production	1
	Sr Asst To VP Transmission/Gen	1
	Sr Asst VP Eng Supl & Analysis	1
	Sr By Prod & Indust Coal Coord	1
	Sr Civil Engineer	2
	Sr Dispatcher	6
	Sr Drafting and Design Tech	1
	Sr Economic Analyst	1
	Sr Electrical Engineer	5
	Sr Engy Mktg Business Analyst	1
	Sr Fuels & Transportation Admi	1
	Sr Fuels Administrator	1
	Sr Labor Distribution Clerk	3
	Sr Laboratory Technician	4
	Sr Market Compliance Analyst	1
	Sr Market Policy Analyst	1
	Sr Mechanical Engineer	2
	Sr Metallurgical Engineer	1
	Sr Planning Analyst	1
	Sr Scheduler Power & Gas	1
	Sr Scientist	3
	Sr Scientist - Plnt Cycle Chem	1
	Sr Secretary	5
	Sr Trader	5
	Storeroom Technician A	5
	Supervisor Drafting Services	1
	System Laboratory Supervisor	1
	Trainee A	1
	Turbine-Generator Specialist	3
	VP Energy Supply and Analysis	1
	VP Power Production	1
	VP Transmission/Generation Svc	1
	Warehouse Supvr.	4
Total Headquarter		242
Total headcount		1,127

Plant/Headquarter	Job Title	6/30/2016
General Manager - Ghent	Administrative Coordinator	1
	Auxiliary Operator	15
	Chemical Engineer II	1
	Chief Electrician (E)	2
	Chief Electrician (I)	3
	Chief Mechanic	5
	Civil Engineer II	1
	Coal Equipment Operator	4
	Coal Yard Supervisor	5
	Control Specialist	1
	Electrical Engineer I	2
	Electrical Engineer II	1
	General Manager - Ghent	1
	Grp Ldr - Engineering	1
	Laboratory Technician I	1
	Laboratory Technician II	2
	Lead Electrician (E)	3
	Lead Electrician (I)	2
	Lead Engineer	1
	Lead Mechanic	3
	Maintenance Coordinator	1
	Maintenance Planner	5
	Maintenance Technician A (E)	8
	Maintenance Technician A (I)	12
	Maintenance Technician A (M)	25
	Maintenance Technician B (E)	4
	Maintenance Technician B (I)	2
	Maintenance Technician B (M)	5
	Maintenance Technician C (E)	3
	Maintenance Technician C (I)	3
	Maintenance Technician C (M)	5
	Manager - Production	1
	Mechanic	2
	Mechanical Engineer I	4
	Mechanical Engineer III	1
	Mgr Ghent Env Project Coord	1
	Mgr Maint - Pwr Gen	1
	Outage Coordinator	1
	P.P. Clerk II	1
	P.P. Environmental Supv	1
	P.P. Senior Clerk	1
	P.P. Shift Supervisor	15
	Plant Maint Admin Assistant	1
	Semi-Skilled Laborer	4
	Sr Chemist	1
	Sr Electrical Engineer	1
	Sr Laboratory Technician	3
Sr Safety Specialist	1	
Supervisor - Maintenance	3	
Supervisor - Production	2	
Trainee A (Operations)	4	
Unit Operator	21	
Unit Operator Assistant	23	
General Manager - Ghent Total		221

Plant/Headquarter	Job Title	6/30/2016
General Manager - Green River	General Manager - Green River	1
	Manager - Production	1
	Mgr Maint - Pwr Gen	1
	Safety Specialist III	1
	Warehouse Supvr.	1
General Manager - Green River Total		5
General Manager - Tyrone/Brown	Assistant Coal Yard Supervisor	2
	Auxiliary Operator	5
	Chief Electrician (CT)	1
	Chief Electrician (E)	1
	Chief Mechanic	2
	Coal Equipment Operator	6
	Coal Yard Supervisor	1
	General Manager - Tyrone/Brown	1
	Lead Electrician (E)	1
	Lead Electrician (I)	1
	Lead Mechanic	5
	Maintenance Coordinator	1
	Maintenance Technician A (E)	10
	Maintenance Technician A (I)	4
	Maintenance Technician A (M)	13
	Maintenance Technician B (I)	1
	Maintenance Technician C (E)	1
	Maintenance Technician C (I)	1
	Maintenance Technician C (M)	6
	Manager - Production	1
	Mechanical Engineer I	1
	Mechanical Engineer II	1
	Mgr Maint - Pwr Gen	1
	Mgr Tyrone Operations	1
	O&M Technician A (Ct)	9
	Outage Coordinator	1
	P.P. Clerk I	1
	P.P. Results Coordinator	1
	P.P. Senior Clerk	2
	P.P. Shift Supervisor	10
	Production Support Leader	1
	Production Supv/Compliance	1
	Resource Planner	2
	Semi-Skilled Laborer	4
	Sr Chemist	1
	Sr Laboratory Technician	2
	Sr Mechanical Engineer	2
	Sr Safety Specialist	1
	Sr Secretary	1
	Supervisor - Maintenance	2
	Supervisor - Production	2
	Trainer	1
	Unit Operator	23
Unit Operator Assistant	7	
Unit Operator Asst-Grdfathered	1	
General Manager - Tyrone/Brown Total		143

Plant/Headquarter	Job Title	6/30/2016
Gen Mgr Cane Run & Comb Turb	Gen Mgr Cane Run & Comb Turb	1
	I&E Technician A	2
	Laboratory Technician	1
	Maintenance Coordinator	1
	Maintenance Leader	1
	Maintenance Planner	2
	Mechanical Engineer I	1
	Mgr Ops & Maint (CT&CCGT)	1
	Operations & Maintenance Ldr	6
	Ops & Maint Tech A (CT)	18
	Ops & Maint Tech B (CT)	3
	Production Supv/Compliance	1
	Sr Control Specialist	2
	Sr Safety Specialist	1
	Sr Secretary	1
	Supervisor - Maintenance	1
	Supervisor - Production	2
	Technical Trainer	1
	Turbine Operator-Mechanic	6
	Gen Mgr Cane Run & Comb Turb Total	
General Manager - Mill Creek	Assistant Operator - Plant MC	7
	Auxiliary Operator - Plant MC	11
	Bldg Maintenance Tech A - MC	3
	Chemical Engineer III	1
	Civil Engineer II	1
	Civil Engineer III	1
	Electrical Engineer II	1
	General Manager - Mill Creek	1
	Grp Ldr - Engineering	1
	I&E Technician Planner	1
	I&E Technician A	26
	I&E Technician B	3
	I&E Technician Helper	1
	Laboratory Assistant	2
	Laboratory Leader	1
	Laboratory Technician	11
	Lead Mat Handling Operator	13
	Maintenance Coordinator	1
	Maintenance Leader	14
	Maintenance Planner	5
	Manager - Production	1
	Material Handling Leader	3
	Materials Handling Supervisor	1
	Mech Repair Technician A	20
	Mech Repair Technician B	5
	Mechanical Engineer I	1
	Mechanical Engineer II	1
	Mgr Maint - Pwr Gen	1
	Operator - Plant MC	50
	Operator - Yard	18
	Outage Coordinator	1
	P.P. Environ Coord III	1
	Production Leader	17
	Production Support Leader	3
	Production Supv/Compliance	1
	Sr Chemical Engineer	1
	Sr Control Specialist	2
	Sr Mechanical Engineer	1
	Sr Safety Specialist	1
	Sr Secretary	1
	Station Helper - Plant MC	5
	Supervisor - Maintenance	4
	Supervisor - Production	1
General Manager - Mill Creek Total		245

Plant/Headquarter	Job Title	6/30/2016
General Manager - Trimble	Assistant Operator-Trimble Co	5
	Auxiliary Operator-Trimble Co	14
	CCR Supervisor	1
	Chemical Engineer I	1
	Chemical Engineer III	1
	Civil Engineer I	1
	Control Specialist	2
	Dept/Div Secretary	1
	Electrical Engineer III	2
	General Manager - Trimble	1
	Grp Ldr - Engineering	1
	I&E Technician A	26
	I&E Technician B	1
	Laboratory Assistant	1
	Laboratory Technician	5
	Lead Engineer	1
	Lead Mat Handling Operator	4
	Maintenance Coordinator	1
	Maintenance Leader	8
	Maintenance Planner	7
	Manager - Production	1
	Material Handling Leader	3
	Mech Repair Technician A	10
	Mech Repair Technician B	5
	Mechanical Engineer I	2
	Mechanical Engineer II	2
	Mgr Maint - Pwr Gen	1
	Operator - Trimble County	23
	Outage Coordinator	1
	P.P. Environ Coord II	1
	P.P. Environ Coord III	1
	Production Leader	8
	Production Support Leader	3
	Safety Specialist III	1
	Sr Chemical Engineer	1
	Sr Control Specialist	1
	Sr Secretary	1
	Sr Training Coordinator	2
	Station Helper -Trimble County	7
	Supervisor - Maintenance	2
	Supervisor - Production	2
General Manager - Trimble Total		162

Plant/Headquarter	Job Title	6/30/2016
Headquarter	Account Manager II Municipals	1
	Assoc Trader	2
	Boiler Data Specialist	1
	Boiler Welding QA/QC Spec	1
	Buyer I	2
	Buyer II	4
	Buyer III	5
	Chemical Engineer I	2
	Chemist	1
	Civil Engineer I	5
	Civil Engineer III	2
	Commercial Ops Analyst	1
	Compliance Engineer III	2
	Consumer Behavior Analyst	1
	Contract Administrator II	6
	Contract Administrator III	6
	Contract Coordinator	1
	Controls Specialist - Gen Srvs	2
	CSS Administrative Coordinator	1
	Data Records Coordinator	2
	Dept/Div Secretary	3
	Design Drafter A	3
	Dir Business Development	1
	Dir Corp Fuels & By-Products	1
	Dir Engy Pln/Analysis/Forecast	1
	Dir Fleet Maint Perform&Reliab	1
	Dir Generation Services	1
	Dir Marketing	1
	Dir Power Supply	1
	Dir Project Engineering	1
	Dir Pwr Gen Commercial Ops	1
	Document Management Spec II	1
	Drafting and Design Tech II	2
	Electrical Engineer III	5
	Energy Analyst I	1
	Energy Analyst III	3
	Energy Mkt/IT Bus Project Ldr	1
	Fin Eng & Model Analyst	1
	Fuels Accounting Analyst III	2
	Fuels Acct & Admin Assoc III	2
	Fuels Analyst	1
	Fuels Coord II	2
	G.O. Senior Clerk	1
	Generation Dispatcher	1
	Grp Ldr - Engineering	2
	Grp Ldr Research & Development	1
	I&E Planner	1
	Industrial/Site Relations Mgr	1
	Inventory Attendant A-MC	2
	Lead Engineer	5
	Lead Proj Coord-Major Cap Proj	1
	Market Compliance Analyst	1
	Market Policy Analyst	1
	Mechanical Engineer II	8
	Mechanical Engineer III	1
Mgr Commercial Operations	5	
Mgr Compliance & Document Mgmt	1	
Mgr Contracts/Mjr Capital Proj	1	
Mgr Economic Analysis	1	
Mgr Fleet Ops Perf & Reliab	1	
Mgr Fuels Acctg and Admin	1	
Mgr Fuels Risk Management	1	
Mgr Fuels Technical Services	1	

Plant/Headquarter	Job Title	6/30/2016
	Mgr Generation Engineering	1
	Mgr Generation Planning	1
	Mgr Hourly Trading	1
	Mgr LG&E And KU Fuels	1
	Mgr Major Capital Projects	5
	Mgr Market Compliance	1
	Mgr Reg Generation Dispatch Op	1
	Mgr Sales Analysis & Forecast	1
	Mgr Turbine-Generator Maint	1
	Maintenance Supervisor	1
	Office & Special Prjcts Supvr	1
	Operations Analysis	1
	Operator	1
	Planning Analyst II	2
	Planning Analyst III	3
	Principal Engineer	2
	Production Leader	1
	Project Coor-Major Cap Project	19
	Project Planning Dev Coord	2
	R&D Engineer/Scientist - Ph.D.	2
	Records Coordinator - A	3
	Safety Specialist II	1
	Safety Specialist III	3
	Scientist I	1
	Scientist II	1
	Service Shop Coordinator	1
	Sourcing Assistant - Sr.	6
	Sourcing Assistant II	1
	Sr Asst to VP Power Production	1
	Sr Asst To VP Transmission/Gen	1
	Sr Asst VP Eng Supl & Analysis	1
	Sr By Prod & Indust Coal Coord	1
	Sr Chemist	1
	Sr Civil Engineer	2
	Sr Dispatcher	6
	Sr Drafting and Design Tech	1
	Sr Economic Analyst	1
	Sr Electrical Engineer	5
	Sr Engy Mktg Business Analyst	1
	Sr Fuels & Transportation Admi	1
	Sr Fuels Administrator	1
	Sr Labor Distribution Clerk	3
	Sr Laboratory Technician	4
	Sr Market Compliance Analyst	1
	Sr Market Policy Analyst	1
	Sr Mechanical Engineer	2
	Sr Metallurgical Engineer	1
	Sr Planning Analyst	1
	Sr Scheduler Power & Gas	1
	Sr Scientist	3
	Sr Scientist - Plnt Cycle Chem	1
	Sr Secretary	5
	Sr Trader	5
	Storeroom Technician A	5
	Supervisor Drafting Services	1
	System Laboratory Supervisor	1
	Trainee A	1
	Turbine-Generator Specialist	3
	VP Energy Supply and Analysis	1
	VP Power Production	1
	VP Transmission/Generation Svc	1
	Warehouse Supvr.	4
Total Headquarter		256
Total headcount		1,084

LOUISVILLE GAS AND ELECTRIC COMPANY

CASE NO. 2014-00372

**Response to Attorney General’s Supplemental Requests for Information
Dated February 6, 2015**

Question No. 13

Responding Witness: D. Ralph Bowling

- Q-13. Reference the response to AG 1-157. With respect to the 40 positions at the Cane Run generating stations that are scheduled to be retired, which are expected to be placed elsewhere in the generation fleet, please provide the position title and number of positions for each title that comprise the 40 employees.
- A-13. Of the 108 employees at the Cane Run generating station at the time of its closure, it was previously stated that 43 would move to the Cane Run 7 operations and 25 will retire, leaving 40 to be placed. Upon further review, the 25 retirees include 6 employees who are located at the Cane Run plant but are considered headquarters employees. Therefore, the forecast actually reflects 46 employees who will be placed elsewhere in the fleet. The listing of those employees is provided below:

Plant Assignment	Position title	# of positions
Headquarters	IE Maintenance Planner	1
Headquarters	Manager - Production	1
Headquarters	Operator - Cane Run	1
Headquarters	Production Leader	1
Headquarters	Senior Chemist	1
Headquarters	Supervisor - Maintenance	1
Mill Creek	I&E Technician A	5
Mill Creek	Laboratory Technician	4
Mill Creek	Lead Mat Handling Operator	3
Mill Creek	Maintenance Planner	1
Mill Creek	Material Handling Leader	1
Mill Creek	Mechanical Repair Technician A	4
Mill Creek	Operator - Cane Run	18
Mill Creek	Operator - SPP	1
Mill Creek	Production Leader	3
	Total	46

LOUISVILLE GAS AND ELECTRIC COMPANY

CASE NO. 2014-00372

**Response to Attorney General's Supplemental Requests for Information
Dated February 6, 2015**

Question No. 14

Responding Witness: D. Ralph Bowling

Q-14. Reference the response to AG 1-157. With respect to the 40 positions at the Cane Run generating stations that are scheduled to be retired, which are expected to be placed elsewhere in the generation fleet, please provide which plant the employee will be assigned to in the test year

A-14. See the response to Question No. 13.

LOUISVILLE GAS AND ELECTRIC COMPANY

CASE NO. 2014-00372

**Response to Attorney General's Supplemental Requests for Information
Dated February 6, 2015**

Question No. 15

Responding Witness: Christopher M. Garrett

- Q-15. Reference the response to AG 1-173. Provide the data attached to the response as an Excel spreadsheet, with all formulas intact and fully accessible.
- A-15. See attachment being provided in Excel format.

Attachment in Excel

The attachment(s)
provided in separate
file(s) in Excel format.

LOUISVILLE GAS AND ELECTRIC COMPANY

CASE NO. 2014-00372

**Response to Attorney General's Supplemental Requests for Information
Dated February 6, 2015**

Question No. 16

Responding Witness: Christopher M. Garrett

- Q-16. Reference the response to AG 1-173. Is the rate case expense level of \$894,414 for LGE-Electric the actual level of all rate case expenses for the electric rate case? If not, please provide the actual booked amount for case 2012-00222.
- A-16. The Company assumes the reference is to AG 1-5. Yes. As included in AG 1-5, the rate case expense level of \$894,414 for LGE-Electric is the actual level of all rate case expenses for the electric rate case.

LOUISVILLE GAS AND ELECTRIC COMPANY

CASE NO. 2014-00372

**Response to Attorney General's Supplemental Requests for Information
Dated February 6, 2015**

Question No. 17

Responding Witness: Christopher M. Garrett

- Q-17. Reference the response to AG 1-173. Is the rate case expense level of \$284,805.71 for LGE-Gas the actual level of all rate case expenses for the gas rate case? If not, please provide the actual booked amount for case 2012-00222.
- A-17. The Company assumes the reference is to AG 1-5. Yes. As included in AG 1-5, the rate case expense level of \$284,805.71 for LGE-Gas is the actual level of all rate case expenses for the gas rate case.

LOUISVILLE GAS AND ELECTRIC COMPANY

CASE NO. 2014-00372

**Response to Attorney General's Supplemental Requests for Information
Dated February 6, 2015**

Question No. 18

Responding Witness: David S. Sinclair

- Q-18. Reference the response to AG 1-206. Provide the assumed cost of gas and coal delivered at each unit to determine the dispatch order and the associated average unit heat rate.
- A-18. See the table below. Please note that the heat rates used to determine dispatch order in the response to AG 1-206 are full load heat rates.

Unit	Fuel Cost (\$/mmBtu)	Full Load Heat Rate (mmBtu/MWh)
Brown 1	3.15	10.4
Brown 2	3.15	10.3
Brown 3	3.15	10.8
Cane Run 4	2.56	11.2
Cane Run 5	2.56	10.3
Ghent 1	2.26	10.6
Ghent 2	2.26	10.5
Ghent 3	2.26	11.0
Ghent 4	2.26	10.7
Green River 3	2.31	12.9
Green River 4	2.31	10.8
Mill Creek 1	2.38	10.3
Mill Creek 2	2.38	10.4
Mill Creek 3	2.38	10.6
Mill Creek 4	2.38	10.6
Trimble County 1	2.35	10.4
Trimble County 2	2.35	9.1
Brown 5	3.75	11.9
Brown 6	3.75	10.4
Brown 7	3.75	10.4
Brown 8	3.75	12.0
Brown 9	3.75	11.8
Brown 10	3.75	11.8
Brown 11	3.75	12.0

Unit	Fuel Cost (\$/mmBtu)	Full Load Heat Rate (mmBtu/MWh)
Trimble County 5	3.85	10.4
Trimble County 6	3.85	10.4
Trimble County 7	3.85	10.4
Trimble County 8	3.85	10.4
Trimble County 9	3.85	10.4
Trimble County 10	3.85	10.4
Cane Run 11	6.18	16.1
Haefling	8.50	17.0
Paddy's Run 11	4.00	15.5
Paddy's Run 12	4.00	17.0
Paddy's Run 13	4.00	10.2
Zorn 1	6.18	18.7
OVEC*	N/A	N/A
Hydro (Ohio Falls and Dix Dam)	N/A	N/A

*OVEC was ordered based on forecasted price, which was assumed to be \$27.89/MWh.

LOUISVILLE GAS AND ELECTRIC COMPANY

CASE NO. 2014-00372

Response to Attorney General's Supplemental Requests for Information
Dated February 6, 2015

Question No. 19

Responding Witness: David S. Sinclair

- Q-19. Reference the response to AG 1-206. Provide the assumed cost of gas and coal delivered at each unit to determine the dispatch order and the associated average unit heat rate.
- A-19. The Companies assume this question was meant to reference AG 1-207. See the table below. Please note that the heat rates used to determine dispatch order in the response to AG 1-207 are average heat rates.

Unit	Fuel Cost (\$/mmBtu)	Average Heat Rate (mmBtu/MWh)
Brown 1	3.10	11.4
Brown 2	3.09	10.6
Brown 3	3.10	12.0
Cane Run 7	4.43	6.9
Ghent 1	2.34	10.8
Ghent 2	2.35	10.6
Ghent 3	2.35	11.1
Ghent 4	2.34	11.0
Green River 3	2.45	13.3
Green River 4	2.44	11.1
Mill Creek 1	2.38	10.3
Mill Creek 2	2.38	10.6
Mill Creek 3	2.38	10.5
Mill Creek 4	2.38	10.9
Trimble County 1	2.38	10.4
Trimble County 2	2.43	9.2
Bluegrass PPA	4.35	11.2
Brown 5	4.62	15.7
Brown 6	4.62	11.4
Brown 7	4.62	11.2
Brown 8	4.59	14.9
Brown 9	4.61	15.4
Brown 10	4.62	15.4

Unit	Fuel Cost (\$/mmBtu)	Average Heat Rate (mmBtu/MWh)
Brown 11	4.62	14.9
Trimble County 5	4.37	11.2
Trimble County 6	4.38	11.1
Trimble County 7	4.37	11.1
Trimble County 8	4.35	10.8
Trimble County 9	4.36	11.1
Trimble County 10	4.34	10.8
Cane Run 11	5.59	16.1
Haefling	7.61	18.0
Paddy's Run 11	4.38	15.5
Paddy's Run 12	4.38	17.0
Paddy's Run 13	4.43	10.7
Zorn 1	4.38	18.7
OVEC*	N/A	N/A
Hydro (Ohio Falls and Dix Dam)	N/A	N/A

*OVEC was ordered based on forecasted price, which was assumed to be an average of \$28.16/MWh.

LOUISVILLE GAS AND ELECTRIC COMPANY

CASE NO. 2014-00372

**Response to Attorney General's Supplemental Requests for Information
Dated February 6, 2015**

Question No. 20

Responding Witness: D. Ralph Bowling

Q-20. Reference Paul W. Thompson's testimony on page 23, lines 15-17. For generation operations, for 2012, 2014, the base year and test year, please provide a list of position titles and the number of positions for each title.

A-20. Below are the specific positions at the end of each period:

Title	# of positions
As of 12/31/2012	
CIP Clerk	1
Civil Engineer I	2
Electrical Engineer	1
Group Leader - Engineering	1
Lab Assistant	1
Maintenance Tech	3
Mechanical Engineer I	3
Operator	1
Operator/Production Leader	7
Production Leader	1
Project Coordinator - Major Cap Project	7
Project Coordinator	1
Station Helper	1
Supervisor - Maintenance	1
Technician/Maintenance Leader	3
Turbine Specialist	1
As of 12/31/2014	
Boiler Welding QA/QC Specialist	1
Buyer	2
Chemical Engineer I	2
CIP Control Specialist	1
Civil Engineer I	1
Consumer Behavioral Analyst	1

Contract Administrator	3
Control Specialist	1
CSS Administrative Coordinator	1
Department Secretary	1
Dir ES Business Information	-1
Dir. Fleet Maintenance, Performance & Reliability	1
E&I Technician	1
Electrical Engineer	2
Engineer	1
ES SR. Business Info Analyst	-1
I&E Maintenance Planner	1
I&E Technician (SAM)	1
Lab Tech	1
Maintenance Tech	3
Manager	-1
Mechanic	-1
Mechanical Engineer	1
Manager Energy Service Business Info	-1
Manager Major Capital Projects	1
Manager Ops Analysis	-1
OF Turbine Mechanic	2
Operator	-1
Operator/Production Leader	2
R&D Scientist	3
COO Reorg	-2
Scientist I	2
Service Shop Coordinator	1
Sourcing Assistant	1
Sr. Labor Distribution Clerk	1
Supply Mkt and Inventory Analyst	1
Technician/Maintenance Leader	1
Timekeeper	1
Trainer	1
Warehouse Supervisor	1
As of 2/28/2015	
Civil Engineer	1
Commercial Ops Analyst	1
Compliance Engineer	1
Drafter	1
E&I Technician	4

Electrical Engineer	2
Engineer	1
Fuels Analyst	1
I&E Tech A (return from military leave)	1
Maintenance Tech	4
Mechanic	2
Mechanical Engineer	2
Operator	-1
Project Coordinator	1
Trainer	1
Turbine Specialist	1
As of 6/30/2016	
Chemical Engineer	1
Civil Engineer	1
Electrical Engineer	1
Material Handling Leader	1
Mechanical Engineer	4
CCR Supervisor	1
Fuels Analyst	-1
Green River transfer to metering	-11
Green River Retirements	-15
Cane Run Retirements	-25
Total Increase from April 1, 2012	50

LOUISVILLE GAS AND ELECTRIC COMPANY

CASE NO. 2014-00372

**Response to Attorney General’s Supplemental Requests for Information
Dated February 6, 2015**

Question No. 21

Responding Witness: Thomas A. (“Tom”) Jessee

Q-21. Reference Paul W. Thompson’s testimony on page 31, lines 5-15. For transmission operations, for 2012, 2014, the base year and test year, please provide a list of position titles and the number of positions for each title.

A-21. Below are the specific positions at the end of each period:

Title	# of Positions
As of 12/31/2012	
Electrical Engineer	1
Protection/Relay Technician	1
Substation Inspector	1
Mgr Transmission Substation Eng. Constr. Maintenance	1
As of 12/31/2014	
Cascade Analyst	1
Drafting Technician	1
Group Leader Substation Asset Mgmt	1
Lines Inspector	2
Planning Engineer	3
Project Coordinator	1
Protection/Relay Technician	2
Protection Engineer	2
System Control Engineer	2
System Administrator	-4
Safety Coordinator	-1
Contract Coordinator	-1
Civil Engineer	-1
As of 2/28/2015	
Protection/Relay Technician	1
Civil Engineer	1
As of 6/30/2016	
Cascade Administrator	1
Drafting Technician	2
Lines Inspector	1
Substation Inspector	1
Total Increase from April 1, 2012	19

LOUISVILLE GAS AND ELECTRIC COMPANY

CASE NO. 2014-00372

**Response to Attorney General’s Supplemental Requests for Information
Dated February 6, 2015**

Question No. 22

Responding Witness: Paul Gregory (“Greg”) Thomas

Q-22. Reference Paul W. Thompson’s testimony on page 42. For electric distribution operations, by company (i.e. LGE, KU, and LKS) for 2012, 2014, the base year and test year, please provide a list of position titles and the number of positions for each title.

A-22. Below are the specific positions at the end of each period by company:

Title	# of positions	Company
<u>As Of 12/31/2012:</u>		
Electrical Apprentice	1	LG&E
<u>As Of 12/31/2014:</u>		
Electrical Engineer	1	LKS
Line Technician	2	KU
Facility Records Technician	1	KU
Line Technician	7	LG&E
Network Technician	3	LG&E
Restoration Coordinator	2	LKS
Facility Records Technician	1	LG&E
Utility Arborist	1	LKS
Engineer Design Tech	1	KU
Computer Graphics Technician	1	LKS
Project Coordinator	1	LKS
Records Coordinator	2	LG&E
Distribution Operations Assistant	1	KU
Mechanic Helper	1	LG&E
Sr. Distribution Operations Assistant	(1)	KU
Sys Admin	(3)	LKS
Team Leader	(1)	LG&E

Network Technician	3	LG&E
<u>As Of 02/28/2015:</u>		
Line Technician	11	LG&E
Facility Records Technician	1	KU
Electrical Apprentice	3	LG&E
Electrical Engineer	2	LKS
Computer Graphics Technician	1	LKS
SC&M Coordinator Analyst	1	LKS
Engineer Design Tech	1	KU
Line Technician	1	KU
Engineer	1	LKS
Substation Tech	(1)	KU
<u>As Of 06/30/2016:</u>		
Electrical Apprentice	2	LG&E
Electrical Engineer	2	KU
Field Coordinator	3	LG&E
Line Technician	1	LG&E
Total Increase from April 1, 2012	53	

LOUISVILLE GAS AND ELECTRIC COMPANY

CASE NO. 2014-00372

**Response to Attorney General's Supplemental Requests for Information
Dated February 6, 2015**

Question No. 23

Responding Witness: Lonnie E. Bellar

Q-23. Reference Paul W. Thompson's testimony on page 48. For gas distribution operations, by company (i.e. LGE, KU, and LKS) for 2012, 2014, the base year and test year, please provide a list of position titles and the number of positions for each title.

A-23. Below are the specific positions at the end of each period by company.

Title	# of positions	Company
<u>As Of 12/31/2012:</u>		
Engineer	1	LG&E
Distribution Mechanic	1	LG&E
<u>As Of 12/31/2014:</u>		
Riser Team Leader	1	LG&E
Gas Construction Group Leader	3	LG&E
Gas Construction Manager	1	LG&E
Pipeline Inspector	1	LG&E
Engineer	3	LG&E
Gas Engineer	3	LG&E
Gas Dispatcher	1	LG&E
Director, Gas Operations, Construction, Engineering	1	LG&E
Corrosion Analyst	1	LG&E
Corrosion Tech	1	LG&E
Distribution Mechanic	3	LG&E
Distribution Mechanic	(2)	LG&E
Project Engineer Muldraugh	1	LG&E
Gas Regulatory Associate	1	LG&E
Manager, Gas Storage Operations	1	LG&E

IM&E Technician	1	LG&E
SR&O Technician	2	LG&E
FTD Distribution Mechanic	1	LG&E
<u>As Of 02/28/2015:</u>		
Gas Controller	1	LG&E
Auxillary Operator	1	LG&E
Gas Engineer	1	LG&E
Team Leader, Gas Construction	1	LG&E
Administrative Assistant Gas Construction	1	LG&E
Project Planner/Scheduler	1	LG&E
Gas Supply Specialist	1	LG&E
Storage Operator	(1)	LG&E
Trouble Technician	(1)	LG&E
<u>As Of 06/30/2016:</u>		
CRM Compliance Training Specialist	1	LG&E
IM&E Technician	2	LG&E
Engineer/Scientist	1	LG&E
Gas Analyst	1	LG&E
Damage Investigator	1	LG&E
Data Planning Analyst	1	LG&E
Gas Regulatory Associate	5	LG&E
Distribution Mechanic	1	LG&E
Gas Controller	1	LG&E
Gas Controller	(1)	LG&E
SR&O Technician	1	LG&E
SR&O Technician	(2)	LG&E
FTD Distribution Mechanic	(1)	LG&E
Total Increase from April 1, 2012	42	

LOUISVILLE GAS AND ELECTRIC COMPANY

CASE NO. 2014-00372

**Response to Attorney General's Supplemental Requests for Information
Dated February 6, 2015**

Question No. 24

Responding Witness: John P. Malloy

- Q-24. Reference Paul W. Thompson's testimony on page 62. For customer services, by company (i.e. LGE, KU, and LKS) for 2012, 2014, the base year and test year, please provide a list of position titles and the number of positions for each title.
- A-24. Below are the specific positions at the end of each period by company.

Title	# of positions	Company
<u>As Of 12/31/2012:</u>		
Billing Analysis Associate	1	LKS
CIP Coordinator	1	LKS
Call Center Representative (Morganfield)	10	LKS
<u>As Of 12/31/2014:</u>		
Customer Care Coach	2	LKS
ROW Agent	3	LKS
Corporate Security Secretary	1	LKS
Manager ROW	1	LKS
Dept/Division Secretary	2	LKS
Electric Meter Tech	1	LG&E
Electrical Engineer	1	LKS
Manager Facilities Construction and Space Utilization	1	LKS
Gas Meter Mechanic Helper	1	LG&E
Manager, Facility Services	1	LKS
Meter Reading Process Analyst	1	LKS
AMR Tech	1	LG&E
Security Technical Assistant	1	LKS
CIP Associate	1	LKS

Call Center Representative (Morganfield)	10	LKS
Call Center Business Analyst	1	LKS
Call Center Performance Operations Rep	1	LKS
Area Retail Operations Manager	1	KU
Billing Analysis Associate	2	LKS
Customer Representative – Business Office	5	KU
Gas Meter Shop Supervisor	1	LG&E
Supervisor Corp Facility Services	1	LKS
Customer Representatives	3	KU
Electric Meter Tech	1	LG&E
<u>As Of 02/28/2015:</u>		
Call Center Business Analyst	1	LKS
Customer Representatives	4	KU
Billing Analysis Associate	1	LKS
Customer Representative – Residential Call Center	6	LKS
Customer Representative – Business Office	2	KU
Call Center QA Rep	1	LKS
Energy Efficiency	4	LKS
Customer Relations Associate	1	LKS
Program Manager	1	LKS
Meter Tech	(1)	LG&E
<u>As Of 06/30/2016:</u>		
ROW Agent	1	LKS
ROW Agent	3	KU
Supervisor Facility Operations	2	KU
Meter Reader	11	KU
Total Increase from April 1, 2012	93	

LOUISVILLE GAS AND ELECTRIC COMPANY

CASE NO. 2014-00372

**Response to Attorney General's Supplemental Requests for Information
Dated February 6, 2015**

Question No. 25

Responding Witness: Paula H. Pottinger, Ph.D.

- Q-25. Reference Direct testimony of Kent Blake at page 9. Provide any and all studies performed by or for the Company regarding the demographics of the Company's workforce.
- A-25. See the response to PSC 2-25 which provides the Company's Workforce Planning document for 2015-2019. While demographics are interwoven throughout the entire document, pages 6 – 8, 15 – 18, 42, 43, 58, 59 and 65 reference specific demographic information that is responsive.

LOUISVILLE GAS AND ELECTRIC COMPANY

CASE NO. 2014-00372

**Response to Attorney General's Supplemental Requests for Information
Dated February 6, 2015**

Question No. 26

Responding Witness: John P. Malloy

- Q-26. Reference CAC 1-1 in Case No 2014-00371. Please provide the same information in the same format for LGE.
- A-26. See attachment being provided in Excel format.

Attachment in Excel

The attachment(s)
provided in separate
file(s) in Excel format.

LOUISVILLE GAS AND ELECTRIC COMPANY

CASE NO. 2014-00372

**Response to Attorney General's Supplemental Requests for Information
Dated February 6, 2015**

Question No. 27

Responding Witness: John P. Malloy

Q-27. Reference CAC 1-5 in Case No 2014-00371. Please provide the same information in the same format for LGE.

A-27. See table below.

	2009	2010	2011	2012	2013	2014
(a) LG&E residential accounts that were shut off	31,200	57,923	64,430	61,826	68,673	64,037
(b) LG&E total accounts disconnects more than once	5,728	11,816	13,230	13,078	14,864	13,390

2009 Only Includes Data from May to December

LOUISVILLE GAS AND ELECTRIC COMPANY

CASE NO. 2014-00372

**Response to Attorney General's Supplemental Requests for Information
Dated February 6, 2015**

Question No. 28

Responding Witness: John P. Malloy

Q-28. Reference CAC 1-7 in Case No 2014-00371. Please provide the same information in the same format for LGE.

A-28. Below is the average monthly invoice and consumption for LG&E combined electric and gas residential customers for each year 2010 through 2014. 2009 data is not available.

LG&E Customer	2009	2010	2011	2012	2013	2014
Residential \$		\$123.68	\$127.66	\$121.32	\$135.65	\$145.25
Residential kWh		1,093	1,034	1,015	988	987
Residential CCF		58	57	47	59	64

LOUISVILLE GAS AND ELECTRIC COMPANY

CASE NO. 2014-00372

**Response to Attorney General's Supplemental Requests for Information
Dated February 6, 2015**

Question No. 29

Responding Witness: John P. Malloy

Q-29. Reference CAC 1-9 in Case No 2014-00371. Please provide the same information in the same format for LGE.

A-29. Below is the breakdown of the average LG&E combined gas and electric residential customer invoice amount for the 12 months starting in January 2014 and ending in December 2014.

Calendar Year/Month	Average Invoice \$	Average kWh	Average CCF
Jan 2014	\$218.94	1,196	157
Feb 2014	\$210.92	1,094	162
Mar 2014	\$173.11	927	123
Apr 2014	\$121.18	714	63
May 2014	\$102.51	750	26
Jun 2014	\$125.02	1,068	16
Jul 2014	\$142.47	1,318	13
Aug 2014	\$124.62	1,130	12
Sep 2014	\$131.18	1,197	12
Oct 2014	\$100.82	784	18
Nov 2014	\$120.30	720	57
Dec 2014	\$171.91	947	110

LOUISVILLE GAS AND ELECTRIC COMPANY

CASE NO. 2014-00372

**Response to Attorney General's Supplemental Requests for Information
Dated February 6, 2015**

Question No. 30

Responding Witness: John P. Malloy

- Q-30. Reference CAC 1-10 in Case No 2014-00371. Please provide the same information in the same format for LGE.
- A-30. See attachment being provided in Excel format.

Attachment in Excel

The attachment(s)
provided in separate
file(s) in Excel format.

LOUISVILLE GAS AND ELECTRIC COMPANY

CASE NO. 2014-00372

**Response to Attorney General's Supplemental Requests for Information
Dated February 6, 2015**

Question No. 31

Responding Witness: John N. Voyles, Jr.

Q-31. Provide any policy LGE has regarding the use of coal combustion residue – specifically coal ash – for beneficial reuse.

A-31. See attached.

Coal Combustion Product Management Revision 2 - March 19, 2012

The issues involved with the management of Coal Combustion Products (CCP) have long-term implications for all generating stations and are multi-faceted, requiring a centrally coordinated approach. CCP include flyash, bottom ash, gypsum and gypsum fines. As the issues have a large impact on operation of the stations and have considerable cost implications, a cross-functional team, sponsored by the VP Power Production manages the processes involved. This team will ensure a fleet-wide assessment of both on-site disposal alternatives and off-site beneficial reuse opportunities. As the market conditions for beneficial reuse are rapidly changing, a combination of strategies and options are required for ensuring continuity in the long-term disposition or on-site storage of byproducts.

The key tasks for long-term management of coal combustion products are:

- Assessment of the market for bulk commodities and beneficial reuse opportunities
- Market development for reuse opportunities
- Sales of byproducts
- Engineering assessment of on-site storage options
- Development and construction of on-site storage facilities
- Implementation of on-site storage activities and reuse contracts
- Comprehensive plan development for disposition of combustion by-products

The following process maps define the flow and responsibilities of these tasks:

- Analysis of New Opportunity
- Execution of Contracts and Plan
- Monitoring of Physical Storage and Refinement of Plan

Opportunities for beneficial reuse of coal combustion by-products have shifted from a net revenue position to a net cost position. Due to increased competition in the market (i.e., the majority of FGD retrofits producing synthetic gypsum; NOx compliance deteriorating ash quality; utilities willing to pay to move their by-products off-site, etc.), opportunities to move by-products off-site, at no cost, have been virtually eliminated. With increased competition to take advantage of off-site beneficial reuse opportunities, by-product quality and associated cost to move by-product to market, have become the two major components driving evaluation. Every group involved needs to understand the break point (i.e., the avoided cost to dispose of the next ton on-site) where expending dollars to move by-product off-site is the lower cost alternative; each plant's O&M and capital planning should incorporate these expenses .

In addition, the team maintains on-site disposal capabilities for each individual generating station. Due to the length of time it takes to design, permit, engineer

and construct these disposal facilities, each O&M and capital budget and operating plan needs to contain appropriate capital to preserve the most cost-effective on-site management of coal combustion by-products.

The coal combustion product team exists of the following representation and support staff involvement:

Core Team

- Generation Services
- Corporate Fuels & Byproducts
- Operations
- Project Engineering
- Generation Planning

Support Team

- Environmental
- Rates & Regulatory
- Legal
- External Affairs

The team continually assesses operational data, projected life of on-site storage, terms and risks for off-site contracts, market opportunities, and least cost alternatives, assessments of risks and adequacy of backup planning. A description of the roles and responsibilities for each of the cross-functional organizations follows:

Core Team

Generation Services serves as the central point of coordination and will be responsible to support the executive sponsor for the fleet-wide activities required. This will include maintenance of the comprehensive plan for disposition of all station CCP. As the central point of contact, they will be responsible for pulling together engineering assessments of the on-site options and for all of the information provided by each group involved in the strategy. Generation Services will produce full assessment reports not less than annually. They will also assure appropriate budgets are defined and included in the planning processes for all identified and agreed initiatives. Generation Services should also, in concert with Fuels, monitor research and development activities which can contribute to economically attractive opportunities for beneficial reuse.

Corporate Fuels & By-Products, with expertise in the procurement and transport of bulk materials, is responsible for market assessments for bulk commodities and identifying and/or facilitating existing and new beneficial reuse opportunities and coordination of the evaluation of these opportunities across the fleet. This includes developing a beneficial reuse

market, assessments of potential barriers for the products, sales for the products and working with other support groups when required. This group shares responsibility with plant General Managers, for the negotiation of contracts for beneficial reuse which take fleet-wide issues into consideration (negotiations are opportunity specific and determined as part of the "Analysis of New Opportunity" process). Fuels can utilize outputs from Vista for coal procurement impacts on the byproduct stream and coordinate the inputs for production modeling.

General Managers at each station are responsible for implementation of the on-site storage activities and reuse contracts. The station appoints a key individual responsible for and knowledgeable of activities at their generating stations, including disposal in on-site ash treatment basins, landfills and gypsum stacks and preparation of ash and/or gypsum for off-site beneficial reuse. Each plant is responsible for monitoring and reporting statistics that aid in tracking the remaining useful life of existing on-site disposal facilities. Each plant, with involvement from the Fuels group, is also responsible for maintaining the quality of by-products needed to meet contractual obligations for off-site beneficial reuse and for managing the contractual relationships with the partners selected for beneficial reuse off take. Plant General Managers share responsibility with the Corporate Fuels & By-Products group for the negotiation of contracts for beneficial reuse which take fleet-wide issues into consideration (negotiations are opportunity specific and determined as part of the "Analysis of New Opportunity" process).

Generation Planning are responsible for development and maintenance of the long-range planning models to assist in the projection of life consumption and for the economic disposition (least cost analyses) of coal combustion by-products across the fleet (through the integrated resource planning process). Generation Planning provides the interface with Rates & Regulatory to insure communication with the ECR mechanism and cost recovery options are adequately evaluated per established procedure.

Project Engineering is responsible for development, engineering, estimating and review of all construction alternatives and for implementation of major construction projects. This includes 3rd party engineering assessments, development of construction alternatives and permitting coordination with Environmental Affairs. Depending on the scope of the individual projects, engineering, permitting, procurement, and construction may take up to 6 years. Management of the associated projects for the expansion of existing or construction of new facilities at the generating stations that either provide for on-site disposal or enable the utilization of coal combustion by-products off-site are performed in concert with the respective station management.

Support Teams

Environmental Affairs will be responsible for assuring beneficial reuse projects qualify under the rules of the agencies and will be the lead for any permitting required for both on-site storage and/or beneficial reuse projects.

Law Department will assist as necessary in the permitting processes and the analysis of risks associated with any contractual arrangements.

Rate and Regulatory will be responsible for assessing the alternatives and securing the appropriate regulatory treatment.

External Affairs will be involved to assess where improvements in the statutes should be considered.

The team will be responsible to produce, and maintain current, a long-term by-product management plan that evaluates the capital costs for on-site disposal options and O&M costs associated with on-site storage or off-site beneficial reuse opportunities. This assessment evaluates the least cost alternatives for on-site disposal to arrive at the cost to dispose of the next ton of by-product on-site at each individual generating station and, when compared across the fleet, to identify the overall least cost disposal alternative. This “least cost” for the next disposal alternative or the “avoided cost” to place the next ton on-site then becomes the basis for what each plant (and the fleet) is willing to pay to subsidize off-site beneficial reuse projects. This least-cost plan will ensure uniform decision-making regarding coal combustion by-products across the fleet. The plan is evaluated for appropriate regulatory treatment so that necessary capital expenditures as well as the O&M costs associated with the management of coal combustion by-products across the fleet are recovered in a timely manner.

**Analysis of Coal Combustion Product (CCP)
Beneficial Re-Use Opportunity Signoff**

<u>Brief Description of Opportunity</u>

Environmental Affairs

Michael Winkler, Manager Environmental Programs (Date)

Generation Planning

Stuart Wilson, Manager Generation Planning (Date)

Legal Department

Jim Dimas, Senior Corporate Attorney (Date)

Project Engineering (If Opportunity Requires Capital Investment Managed by Project Engineering)

Scott Straight, Director Project Engineering (Date)

Corporate Fuels & By Products

Kenneth Tapp, Senior By Product & Industrial Coal Coordinator (Date)

Generating Station

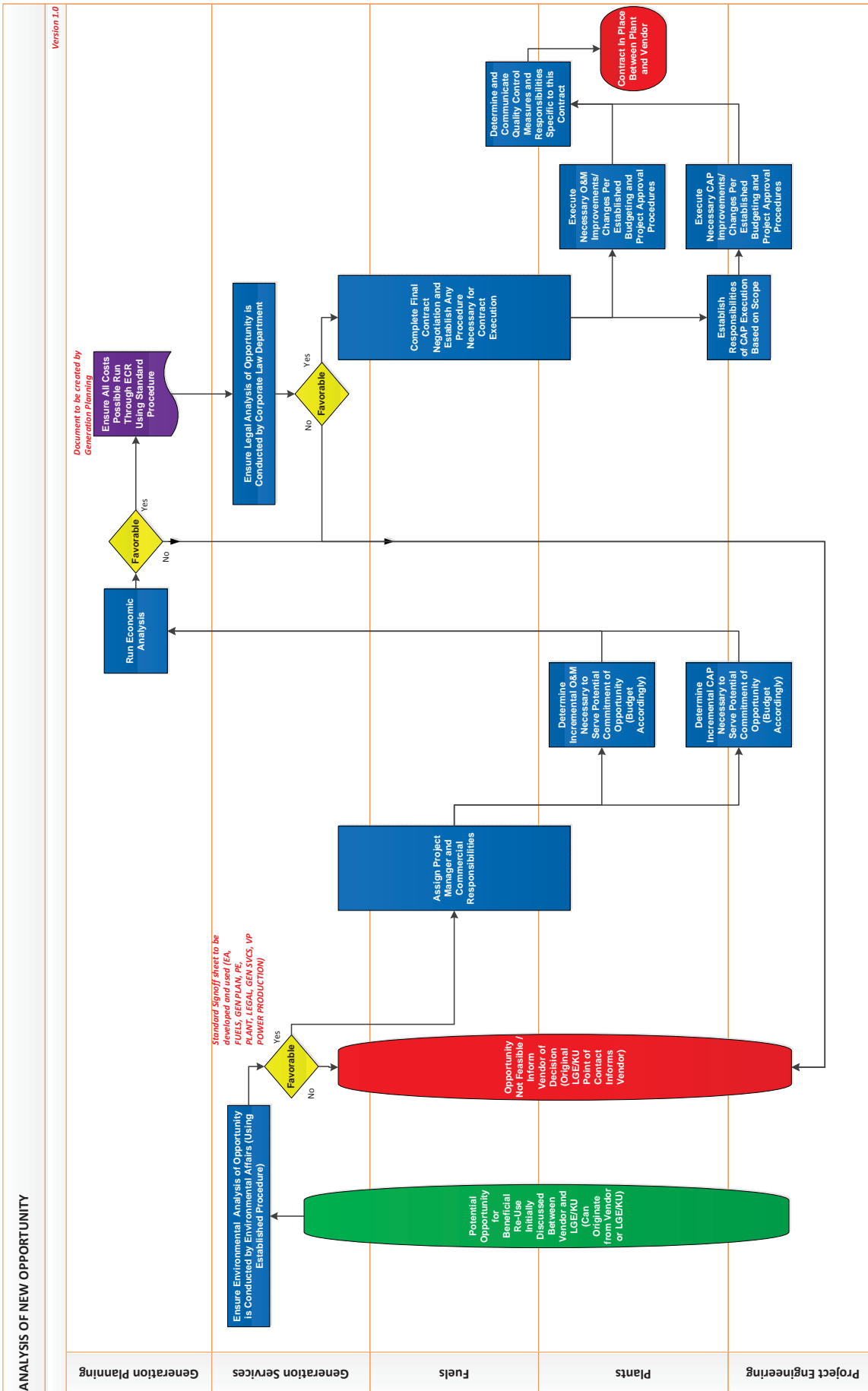
(Insert Name), General Manager – (Insert Station) (Date)

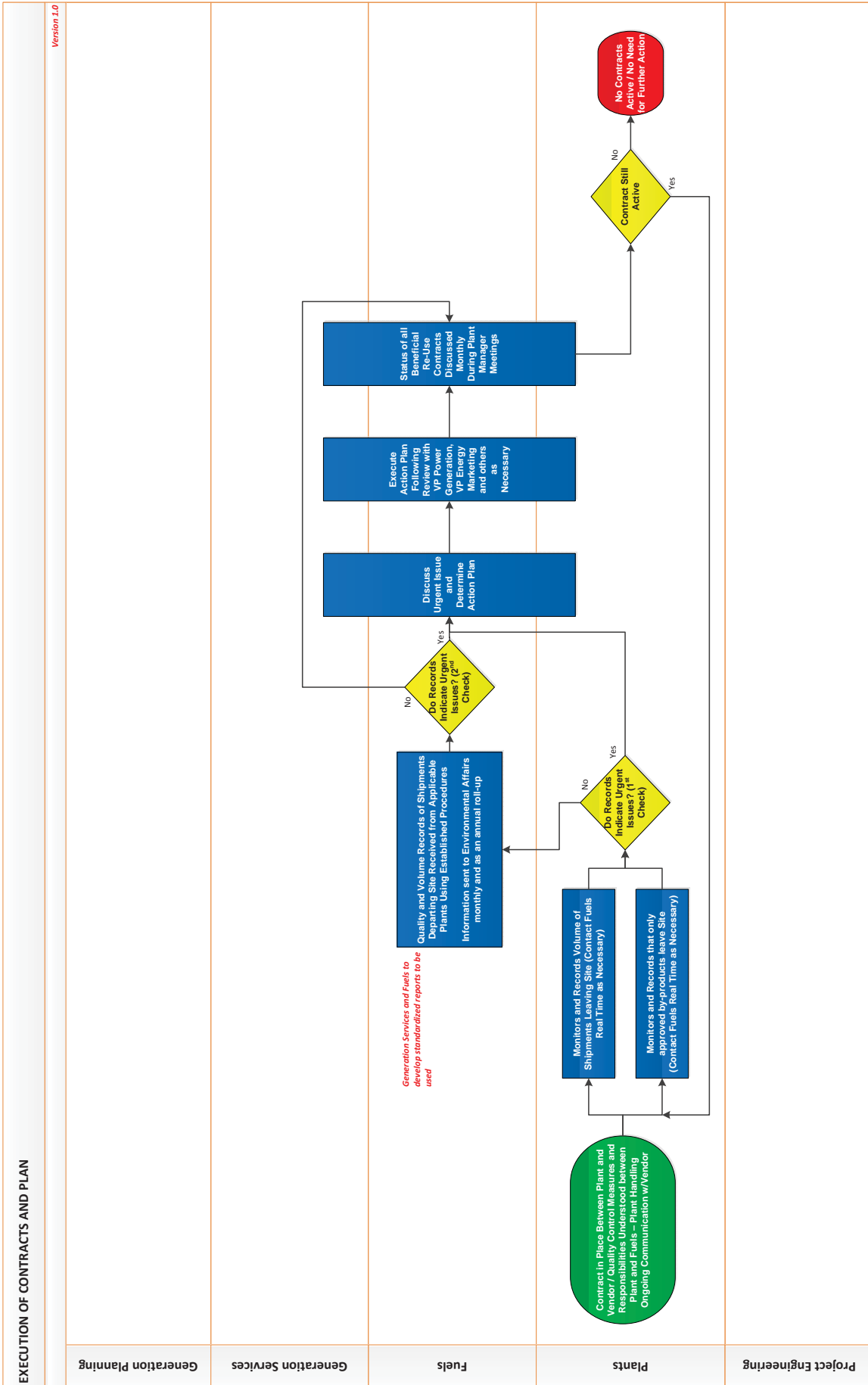
Generation Services

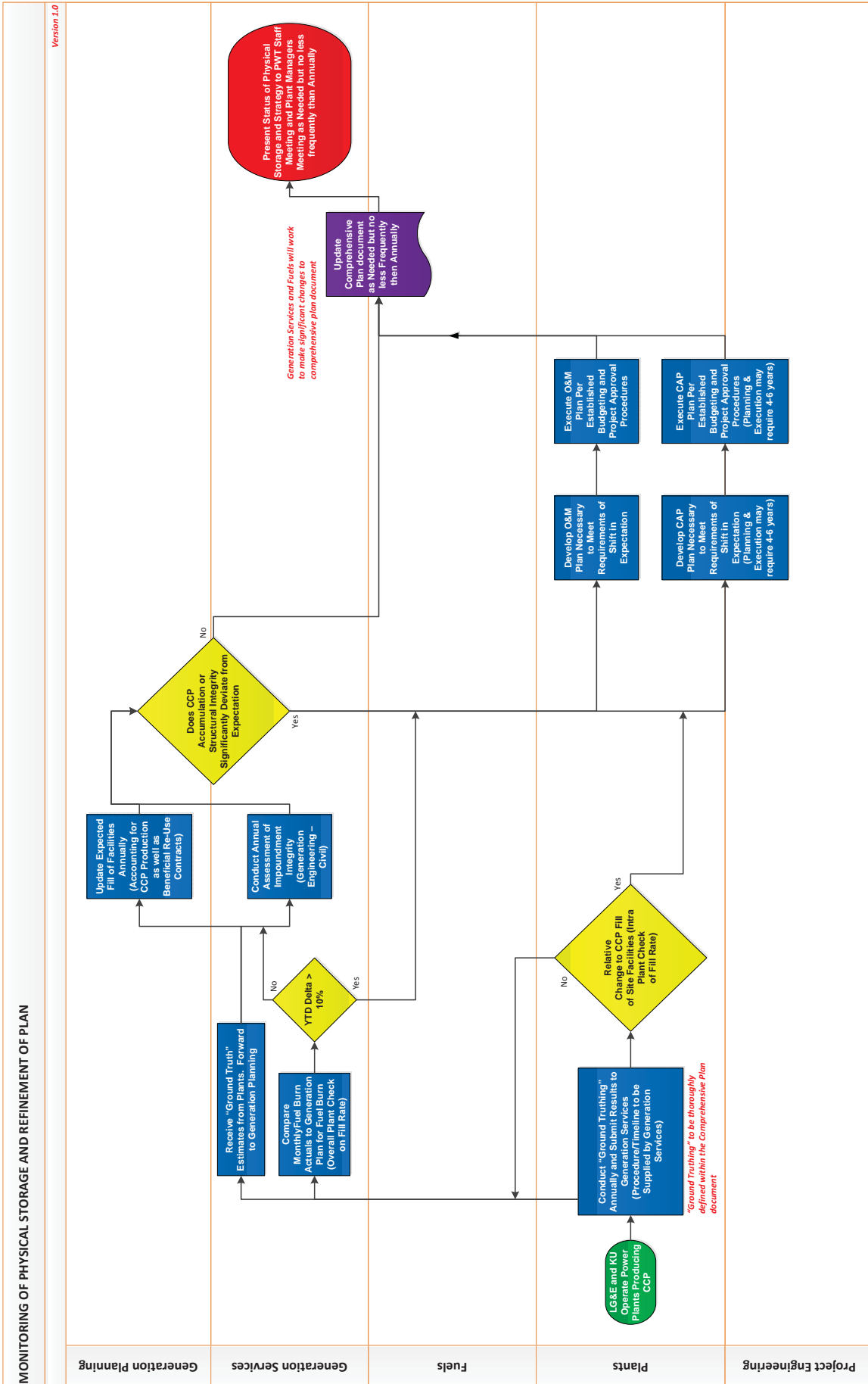
Eileen Saunders, Director Generation Services (Date)

Form Effective Date: 9/14/2012

Revised: 2/9/15







LOUISVILLE GAS AND ELECTRIC COMPANY

CASE NO. 2014-00372

**Response to Attorney General’s Supplemental Requests for Information
Dated February 6, 2015**

Question No. 32

Responding Witness: David S. Sinclair

- Q-32. Provide a list of projects where LGE coal ash has been or will be used in a beneficial reuse project.
- A-32. LG&E has been pursuing beneficial reuse opportunities for its coal combustion residuals (“CCRs”) for many years. The table below contains information regarding current beneficial reuse contracts.

Station	Product	Partner	Reuse	Tons	Term
Trimble County	Fly Ash	Holcim	Cement	Up to 350,000	2013 - 2037
Trimble County	Gypsum	Synmat	Wallboard	Up to 350,000	2008 - 2027
Mill Creek	Fly Ash	Kosmos	Cement	Up to 100,000	2009 - 2019
Mill Creek	Fly Ash	Charah	Concrete	Not Specified	N/A
Mill Creek	Gypsum	Kosmos	Cement	Not Specified	N/A
Mill Creek	Gypsum	Charah	Agriculture Sulfur Pellets	Up to 125,000	2013 - 2027

LOUISVILLE GAS AND ELECTRIC COMPANY

CASE NO. 2014-00372

**Response to Attorney General's Supplemental Requests for Information
Dated February 6, 2015**

Question No. 33

Responding Witness: David S. Sinclair

- Q-33. With the level of certainty in regards to coal ash and beneficial reuses, does LGE intend to proactively identify and secure beneficial reuse projects for its coal ash?
- A-33. Yes. According to the final CCR rule, the beneficial reuse of CCRs is acceptable provided that the CCR provides a functional benefit, is a substitute for a virgin material (which allows for conservation of a natural resource), and meets a design standard or product specification in a manner that complies with environmental regulations. The Companies are always looking for beneficial reuse projects that meet these requirements.

LOUISVILLE GAS AND ELECTRIC COMPANY

CASE NO. 2014-00372

**Response to Attorney General's Supplemental Requests for Information
Dated February 6, 2015**

Question No. 34

Responding Witness: Daniel K. Arbough / Lonnie E. Bellar

- Q-34. On or about September 17, 2014, a leak occurred in an LG&E gas main in Oldham County, Kentucky, that led to an apparent catastrophic failure of the gas main. News reports indicated that as a result of the gas main's failure, several thousand gas customers were left without service for several days.
- a. Identify any and all claims occurring as a result of the gas main's failure, including any potential CERCLA claims.
 - b. Identify any and all corrective measures the company has taken to repair the gas main failure in Oldham County.
 - c. If the type of defect that the company believes led to the failure of the gas main in Oldham County has been found in any portions of the company's transportation and/or distribution systems, please identify what measures the company is taking to address any such issues.
 - d. Identify any and all insurance coverage that provided compensation for any claims incurred as a result of the apparent gas main failure.
 - e. Identify any and all insurance coverage that provided compensation for any repairs of any other defects or potential defects of a similar nature that may have been found elsewhere on the company's transportation and/or distribution system.
 - f. Identify any and all ratepayer impacts, including any additional sums to be funded through the AMRP.
- A-34. a. See attached for a list of claims paid and reserved for damage to the property of others. There are no CERCLA implications.
- b. The piping at the site was replaced. All pipe used in the post incident repair supports the design requirements of 49 CFR 192 Subpart C, "Pipe Design," and met the requirements of API 5L-PSL2.

- c. A mechanical coupling installed on a gas transmission trunk line failed causing the incident described above. A review has been conducted and no additional mechanical coupling installations on gas transmission system trunk lines were identified. Our review has confirmed our initial expectation that the use of mechanical couplings on these types of lines was extremely rare.
- d. There was no insurance compensation provided for any claims incurred as a result of the referenced incident. LG&E is covered for third-party liability claims under its excess liability insurance, but none of the claims exceeded the self-insurance retention level in the policy.
- e. LG&E has not received any insurance compensation, and does not expect to receive any compensation in the future, for work performed on the Company's transportation or distribution system.
- f. Pipeline repairs were charged to a capital account. Customer relights were charged to an operations and maintenance account. No charges were allocated to the Gas Line Tracker.



Claim Event Summary - Multiple Claimants

Report To	Dan Arbough & Jeanne Kugler
Report By	Greg Sisson, 502-489-6289, gregs@uscky.com
Client	LG&E and KU Energy LLC Louisville Gas & Electric
Date of Event	09/17/2014
Event Number	EV2014975844

General Claims

Claimants	Claim #	Type	Reserve	Paid	Collections	Incurred
		GLPD	\$0.00	\$94.00	\$0.00	\$94.00
		GLPD	\$0.00	\$72.00	\$0.00	\$72.00
		GLPD	\$7,000.00	\$0.00	\$0.00	\$7,000.00
		GLPD	\$0.00	\$677.00	\$0.00	\$677.00
		GLPD	\$0.00	\$169.00	\$0.00	\$169.00
		GLPD	\$0.00	\$176.00	\$0.00	\$176.00
		GLPD	\$0.00	\$95.00	\$0.00	\$95.00
		GLPD	\$1,552.00	\$448.00	\$0.00	\$2,000.00
		GLPD	\$2,947.00	\$8,053.00	\$0.00	\$11,000.00
		GLPD	\$0.00	\$200.00	\$0.00	\$200.00
		GLPD	\$0.00	\$31,164.00	\$11,861.00	\$31,164.00
		GLPD	\$0.00	\$41.00	\$0.00	\$41.00
		GLPD	\$0.00	\$0.00	\$0.00	\$0.00
		GLPD	\$0.00	\$0.00	\$0.00	\$0.00
		GLPD	\$1,853.00	\$147.00	\$0.00	\$2,000.00
		GLPD	\$0.00	\$76.00	\$0.00	\$76.00
		GLPD	\$0.00	\$0.00	\$0.00	\$0.00
		GLPD	\$500.00	\$0.00	\$0.00	\$500.00
		GLPD	\$0.00	\$179.00	\$0.00	\$179.00
TOTALS			\$13,852.00	\$41,591.00	\$11,861.00	\$55,443.00

Event Description LG&E gas line allegedly ruptured causing damage to claimant property. All seek repairs.

Reserve Explanation Reserves on open files reflect estimate of remaining liability property damage exposures.

LOUISVILLE GAS AND ELECTRIC COMPANY

CASE NO. 2014-00372

**Response to Attorney General's Supplemental Requests for Information
Dated February 6, 2015**

Question No. 35

Responding Witness: Thomas A. ("Tom") Jessee

Q-35. Reference the reliability study provided in response to Sierra Club 1-26b and please provide the following information:

a. [BEGIN CONFIDENTIAL]

b.

c.

d.

e. [END CONFIDENTIAL]

A-35. Please note that the referenced reliability study contains non-public transmission function information. FERC's Standards of Conduct for Transmission Providers prohibit providing such information to the marketing-function personnel of any entity, including the Company's own marketing-function employees. The Companies are therefore filing the response under a Petition for Confidential Protection to limit the release of this non-public information to marketing function employees, whether of the Company or any other entity. All other entities receiving this information must similarly keep confidential this information until the Companies post the study for public review. The Companies will notify the Commission when the study becomes public and no longer requires or qualifies for confidential protection.

LOUISVILLE GAS AND ELECTRIC COMPANY

CASE NO. 2014-00372

**Response to Attorney General's Supplemental Requests for Information
Dated February 6, 2015**

Question No. 36

Responding Witness: Thomas A. ("Tom") Jessee

- Q-36. As a non-RTO transmission operator, does LG&E have any obligation under the FERC Order 1000 policies to allow competitive transmission owners to construct and build transmission facilities in the LG&E/KU control area for cost recovery under the LG&E/KU Open Access Transmission Tariff?
- A-36. As required by Order No. 1000, LG&E/KU has joined the Southeastern Regional Transmission Planning group ("SERTP"), which comprises transmission owning utilities in the Southeast.

Under Order No. 1000, incumbent transmission-owning public utilities (as LG&E/KU are considered) do not have a right of first refusal to develop regional projects that are selected for regional cost allocation.¹ Thus, if a project is selected in the regional process for regional cost-allocation purposes, there exists the potential for a competitive third-party transmission developer (also known as a "non-incumbent transmission developer") to build and to allocate costs associated with such a project to LG&E/KU (if LG&E/KU are determined to be Beneficiaries of the project) and other Beneficiaries.² To be eligible to do this, non-incumbent transmission developer must meet certain credit requirements, and demonstrate that it has sufficient technical expertise to develop transmission.³

Under the SERTP processes, for such a project to be potentially eligible for selection in the regional transmission plan for regional cost allocation purposes, the project must meet the following criteria:

1. operates at a voltage of 300 kV or greater;
2. is a transmission line located in the SERTP region;
3. spans at least 50 miles; and

¹ *Transmission Planning and Cost Allocation by Transmission Owning and Operating Public Utilities*, Order No. 1000, 76 FR 49842 (Aug. 11, 2011), FERC Stats. & Regs. ¶ 31,323 (2011), order on reh'g, Order No. 1000-A, 139 FERC ¶ 61,132, order on reh'g 141 FERC ¶ 61,044 (2012).

² Beneficiaries are SERTP enrollees who will receive a potential cost savings associated with a project submitted for regional cost allocation purposes. Attachment K at note 4.

³ *Id.* at Section 24.

4. has two or more Beneficiaries.⁴

Additionally, the project must not be located on the property or right-of-way (“ROW”) belonging to anyone other than the transmission developer absent the consent of the owner of the property or ROW, as the case may be. The proposed transmission project also cannot be an upgrade to an existing facility, which is defined as any expansion, partial replacement, or modification, for any purpose, made to existing transmission facilities.⁵ Furthermore, the project must not contravene state or local laws with respect to construction of transmission facilities.

⁴Attachment K at Section 25.1.

⁵ *Id.* at Section 25.2.

LOUISVILLE GAS AND ELECTRIC COMPANY

CASE NO. 2014-00372

**Response to Attorney General's Supplemental Requests for Information
Dated February 6, 2015**

Question No. 37

Responding Witness: Robert M. Conroy

- Q-37. How does LG&E account for use of its transmission system by both retail and wholesale customers? For example are retail customers Network customers under the LG&E Open Access Transmission Tariff (OATT)?
- A-37. LG&E, as a Load Serving Entity, acquires transmission service from the LKE transmission service provider, and pays for such transmission service under the LG&E/KU OATT. Retail customers are not network customers under the LG&E/KU OATT; retail customers are charged for all service (generation, transmission, and distribution) under standard rate schedules (bundled rates). Wholesale customers are network customers under the LG&E/KU OATT.

LOUISVILLE GAS AND ELECTRIC COMPANY

CASE NO. 2014-00372

**Response to Attorney General's Supplemental Requests for Information
Dated February 6, 2015**

Question No. 38

Responding Witness: Robert M. Conroy

- Q-38. Regarding the LG&E/KU OATT, please provide a list of all transmission dependent wholesale customers connected to the LG&E transmission facilities and indicate the type of transmission service provided to each wholesale customer above.
- A-38. See Tab 41, Attachment to Filing Requirement 807 KAR 5:001 Section 16(7)(k), Page 229-238 of 303.

LOUISVILLE GAS AND ELECTRIC COMPANY

CASE NO. 2014-00372

**Response to Attorney General's Supplemental Requests for Information
Dated February 6, 2015**

Question No. 39

Responding Witness: David S. Sinclair

Q-39. Please provide the criteria used to determine LG&E operating reserve and spinning reserve requirements.

A-39. The operating reserve requirement is made up of regulating reserves and contingency reserves.

NERC Reliability Standard Standards BAL-001-1 and BAL-003-0.1b require Balancing Authorities to regulate the balance area resources to load. To be compliant with BAL-001-1 and BAL-003-0.1b, the Companies maintain regulating reserves. The regulating reserve is calculated based on 1% of the LGE-KU Balancing Authority's forecasted annual peak hourly demand. The regulating reserves are carried by on-line spinning resources.

Standard BAL-002-1 requires each Balancing Authority to have access to or operate Contingency Reserve to cover its most severe single contingency. If the Companies' calculated their Contingency Reserve as a standalone entity, their single most severe contingency would be the Trimble County 2 generator (781 MW – summer gross). Prior to commercial operations of Trimble County 2, the Trimble County 1 unit (547 MW – summer gross) was the single most severe contingency. However, since the Companies participate in a reserve sharing group (with TVA), their contingency reserve requirement is calculated as the Companies' load ratio share of the reserve sharing group's single most severe contingency, TVA's 1,347 MW generating unit. As a result, the Companies' contingency reserve requirement is presently 244 MW. The contingency reserves are carried by a combination of on-line spinning and fast-start resources.

Use of the contingency reserve is limited to one hour in emergency conditions and is not considered a resource for capacity planning to meet firm load.

LOUISVILLE GAS AND ELECTRIC COMPANY

CASE NO. 2014-00372

**Response to Attorney General's Supplemental Requests for Information
Dated February 6, 2015**

Question No. 40

Responding Witness: Dr. William E. Avera / Adrien M. McKenzie

Q-40. Reference the response to PSC 2-42. Do the Companies plan on conducting a formal update of the analyses Avera and McKenzie presented in their direct testimony concerning the DCF analysis in the application? Please explain the answer in full detail.

A-40. See the response to PSC 3-16.

LOUISVILLE GAS AND ELECTRIC COMPANY

CASE NO. 2014-00372

**Response to Attorney General's Supplemental Requests for Information
Dated February 6, 2015**

Question No. 41

Responding Witness: Robert M. Conroy

Q-41. Provide an estimated rate case expense for the pending case.

A-41. See the response to PSC 1-54(b) for estimated rate case expenses for the pending case.

LOUISVILLE GAS AND ELECTRIC COMPANY

CASE NO. 2014-00372

**Response to Attorney General's Supplemental Requests for Information
Dated February 6, 2015**

Question No. 42

Responding Witness: Robert M. Conroy

Q-42. Provide actual rate case expenses that have accrued thus far in the case.

A-42. See attached.

LOUISVILLE GAS AND ELECTRIC COMPANY

CASE NO. 2014-00372

Schedule of Rate Case Preparation Costs

Response to Attorney General's Supplemental Requests for Information

Dated February 6, 2015

Question No. 2-42

Responding Witness: Robert M. Conroy

Date	Invoice #	Vendor Name	Hours (1)	Rate/Hr	Amount	Description	Account
25-Feb-14	776300	STOLL KEENON OGDEN	15.33	261.72	4,011.20	Professional legal services	182335
21-Mar-14	778150	STOLL KEENON OGDEN	28.87	269.54	7,780.91	Professional legal services	182335
21-Apr-14	779447	STOLL KEENON OGDEN	38.99	272.20	10,611.78	Professional legal services	182335
20-May-14	783195	STOLL KEENON OGDEN	10.45	306.84	3,207.44	Professional legal services	182335
19-Jun-14	785345	STOLL KEENON OGDEN	20.76	236.59	4,911.10	Professional legal services	182335
16-Jul-14	786216	STOLL KEENON OGDEN	28.31	302.41	8,560.98	Professional legal services	182335
21-Aug-14	790486	STOLL KEENON OGDEN	80.24	282.87	22,697.54	Professional legal services	182335
22-Sep-14	792296	STOLL KEENON OGDEN	127.89	289.50	37,025.65	Professional legal services	182335
6-Nov-14	794112	STOLL KEENON OGDEN	83.14	254.15	21,130.59	Professional legal services	182335
21-Nov-14	796975	STOLL KEENON OGDEN	268.36	275.98	74,063.30	Professional legal services	182335
10-Dec-14	799082	STOLL KEENON OGDEN	275.91	267.77	73,880.54	Professional legal services	182335
SUBTOTAL LEGAL OUTSIDE COUNSEL LG&E ELECTRIC					267,881.03		
TOTAL LEGAL OUTSIDE COUNSEL LG&E ELECTRIC					267,881.03		
2-Jun-14	62014-2	THE PRIME GROUP LLC	2.60	175.00	455.70	Consulting work related to the upcoming rate case	182335
1-Jul-14	72014-2	THE PRIME GROUP LLC	3.91	164.29	641.70	Consulting work related to the upcoming rate case	182335
1-Aug-14	82014-1	THE PRIME GROUP LLC	35.71	178.13	6,361.20	Cost of service and rate design development	182335
2-Sep-14	92014-1	THE PRIME GROUP LLC	7.63	150.00	1,143.90	Forecasted test year discussions	182335
1-Oct-14	102014-1	THE PRIME GROUP LLC	23.06	151.61	3,496.80	Consulting work related to the upcoming rate case	182335
31-Jul-14	FINANC073114	FINANCIAL CONCEPTS AND APPLICATIONS INC	0.93	420.00	390.60	Research, analysis and testimony preparation	182335
31-Aug-14	FINANC083114	FINANCIAL CONCEPTS AND APPLICATIONS INC	3.72	330.00	1,227.60	Research, analysis and testimony preparation	182335
31-Aug-14	FINANC113014	FINANCIAL CONCEPTS AND APPLICATIONS INC	7.07	331.58	2,343.60	Research, analysis and testimony preparation	182335
3-Nov-14	112014-1	THE PRIME GROUP LLC	106.76	159.58	17,037.60	Consulting work related to the upcoming rate case	182335
1-Dec-14	122014-1	THE PRIME GROUP LLC	33.29	183.24	6,100.80	Consulting work related to the upcoming rate case	182335
3-Dec-14	FINANC103114A	FINANCIAL CONCEPTS AND APPLICATIONS INC	12.83	317.39	4,073.40	Research, analysis and testimony preparation	182335
SUBTOTAL CONSULTANTS LG&E ELECTRIC					43,272.90		
TOTAL CONSULTANTS LG&E ELECTRIC					43,272.90		
19-Nov-14	14121LLO	KENTUCKY PRESS SERVICE			425,758.42	Notice of filing	182335
SUBTOTAL SUPPLIES/SERVICES - OTHER LG&E ELECTRIC					425,758.42		
TOTAL SUPPLIES/SERVICES - OTHER LG&E ELECTRIC					425,758.42		
TOTAL LG&E ELECTRIC					736,912.35		

LOUISVILLE GAS AND ELECTRIC COMPANY

CASE NO. 2014-00372

Schedule of Rate Case Preparation Costs

Response to Attorney General's Supplemental Requests for Information

Dated February 6, 2015

Question No. 2-42

Responding Witness: Robert M. Conroy

Date	Invoice #	Vendor Name	Hours (1)	Rate/Hr	Amount	Description	Account
25-Feb-14	776300	STOLL KEENON OGDEN	3.83	261.72	1,002.80	Professional legal services	182336
21-Mar-14	778150	STOLL KEENON OGDEN	7.22	269.54	1,945.23	Professional legal services	182336
21-Apr-14	779447	STOLL KEENON OGDEN	9.75	272.20	2,652.94	Professional legal services	182336
20-May-14	783195	STOLL KEENON OGDEN	2.61	306.84	801.86	Professional legal services	182336
19-Jun-14	785345	STOLL KEENON OGDEN	5.19	236.59	1,227.78	Professional legal services	182336
16-Jul-14	786216	STOLL KEENON OGDEN	7.08	302.41	2,140.25	Professional legal services	182336
21-Aug-14	790486	STOLL KEENON OGDEN	20.06	282.87	5,674.39	Professional legal services	182336
22-Sep-14	792296	STOLL KEENON OGDEN	31.97	289.50	9,256.41	Professional legal services	182336
6-Nov-14	794112	STOLL KEENON OGDEN	20.79	254.15	5,282.65	Professional legal services	182336
21-Nov-14	796975	STOLL KEENON OGDEN	67.09	275.98	18,515.82	Professional legal services	182336
10-Dec-14	799082	STOLL KEENON OGDEN	68.98	267.77	18,470.14	Professional legal services	182336
SUBTOTAL LEGAL OUTSIDE COUNSEL LG&E GAS					66,970.27		
TOTAL LEGAL OUTSIDE COUNSEL LG&E GAS					66,970.27		
2-Jun-14	62014-2	THE PRIME GROUP LLC	0.65	175.00	113.93	Consulting work related to the upcoming rate case	182336
1-Jul-14	72014-2	THE PRIME GROUP LLC	0.98	164.29	160.43	Consulting work related to the upcoming rate case	182336
1-Aug-14	82014-1	THE PRIME GROUP LLC	8.93	178.13	1,590.30	Cost of service and rate design development	182336
2-Sep-14	92014-1	THE PRIME GROUP LLC	1.91	150.00	285.98	Forecasted test year discussions	182336
1-Oct-14	102014-1	THE PRIME GROUP LLC	5.77	151.61	874.20	Consulting work related to the upcoming rate case	182336
31-Jul-14	FINANC073114	FINANCIAL CONCEPTS AND APPLICATIONS INC	0.23	420.00	97.65	Research, analysis and testimony preparation	182336
31-Aug-14	FINANC083114	FINANCIAL CONCEPTS AND APPLICATIONS INC	0.93	330.00	306.90	Research, analysis and testimony preparation	182336
3-Nov-14	112014-1	THE PRIME GROUP LLC	26.69	159.58	4,259.40	Consulting work related to the upcoming rate case	182336
30-Nov-14	FINANC113014	FINANCIAL CONCEPTS AND APPLICATIONS INC	1.77	331.58	585.90	Research, analysis and testimony preparation	182336
1-Dec-14	122014-1	THE PRIME GROUP LLC	8.32	183.24	1,525.20	Consulting work related to the upcoming rate case	182336
3-Dec-14	FINANC103114A	FINANCIAL CONCEPTS AND APPLICATIONS INC	3.21	317.39	1,018.35	Research, analysis and testimony preparation	182336
SUBTOTAL CONSULTANTS LG&E GAS					3,429.38		
TOTAL CONSULTANTS LG&E GAS					3,429.38		
19-Nov-14	14121LLO	KENTUCKY PRESS SERVICE			106,439.60	Notice of filing	182336
SUBTOTAL SUPPLIES/SERVICES - OTHER LG&E GAS					106,439.60		
TOTAL SUPPLIES/SERVICES - OTHER LG&E GAS					106,439.60		
TOTAL LG&E GAS					176,839.25		
TOTAL RATE CASE EXPENSES @ 1/31/2015					913,751.60		

Note (1) - Hours are calculated based on information provided on the billing statement.