COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

In	tho	Matter	۸f۰
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INVESTIGATION OF KENTUCKY UTILITIES)	
COMPANY'S AND LOUISVILLE GAS &)	
ELECTRIC COMPANY'S RESPECTIVE NEED)	CASE NO. 2015-00194
FOR AND COST OF MULTIPHASE LANDFILLS)	CASE NO. 2013-00194
AT THE TRIMBLE COUNTY AND GHENT)	
GENERATING STATIONS	

SUPPLEMENTAL RESPONSE OF KENTUCKY UTILITIES COMPANY AND LOUISVILLE GAS AND ELECTRIC COMPANY

FIRST DATA REQUEST FOR INFORMATION TO STERLING VENTURES, LLC DATED JULY 2, 2015

FILED: JULY 17, 2015

VERIFICATION

COMMONWEALTH OF KENTUCKY)	
)	SS:
COUNTY OF JEFFERSON)	

The undersigned, **Caryl M. Pfeiffer**, being duly sworn, deposes and says that she is Director – Corporate Fuels and By-Products for 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.

Caryl M/Pfeiffer

Subscribed and sworn to before me, a Notary Public in and before said County

d State, this 17th day of 25ul

2015.

Notary Public

(SEAL)

My Commission Expires:

SUSAN M. WATKINS

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

KENTUCKY UTILITIES COMPANY LOUISVILLE GAS AND ELECTRIC COMPANY

First Data Request for Information to Sterling Ventures, LLC Dated July 2, 2015

Case No. 2015-00194

Question No. 17

Witness: David S. Sinclair/John N. Voyles/R. Scott Straight/Counsel

Q-17. The Company's original applications with the PSC for CPCN's for the Ghent and Trimble County Landfills included an Exhibit titled: *E.ON Comprehensive Strategy for Management of Coal Combustion Byproducts*, June 2009 (the "Comprehensive Strategy"). (See page 18 of Sterling's Complaint), which contained the following statement on the analysis of beneficial use opportunities (the "Opportunity Process"):

While many factors impact decisions on how to proceed (such as safety, ability to acquire needed permit(s), etc.) present value of revenue requirements is used as the primary economic decision metric. In some instances, additional cost metrics (such as cost per cubic yard or cost per ton) may also be quantified. Documentation for the evaluation is typically produced in close proximity to completing the evaluation. Often the supporting documentation is the source from which many internal and external presentations or business cases discussing the issue are developed. As previously stated, documentation regarding the alternatives is typically developed in coordination with consultants, however, the economic evaluation and associated documentation summarizing the economic evaluation is developed within E.ON U.S. At each decision point (such as formulation of alternatives, evaluation of options, development of documentation), oversight is built into the process to serve as a check. The function of this validation step is to subject the alternatives, evaluation or documentation to extensive "what ifs" and to confirm that a better alternative or solution does not possibly exist. For example, is it possible that more favorable economics could not be achieved by selecting an alternative site or location?

With respect to that statement, please answer the following:

• • •

d. To the extent not included in the above request, please provide copies of all emails, correspondence, PVRR analyses, spreadsheets, documentation, internal or external presentations, business cases and any other information prepared and reviewed or discussed with respect to Sterling's 2011 proposal.

...

- i. Please provide copies of all e-mails, correspondence, economic analyses, spreadsheets, documentation, internal or external presentations, business cases and any other information prepared and reviewed or discussed with respect to the Company's decision to use gross value verses a present value or PVRR comparison in its CWA 404 Alternatives Analysis.
- j. In the MACTEC March 2012 Revised 404 Alternatives Analysis (Exhibit J of Sterling's Complaint), MACTEC states at 6-3: "The Preferred Alternative fulfills the responsibility of a publically (sic) regulated utility by the Kentucky Public Service Commission to provide the least cost alternative".

...

v. Pease provide copies of all e-mails, correspondence, gross cost, present value or PVRR analyses, spreadsheets, documentation, internal or external presentations, business cases and any other information prepared and reviewed or discussed with respect to MACTEC's statement above, and a decision, if any, to change to the gross cost comparison method used in the December 2014 Supplement to Alternatives Analysis.

A-17. ORIGINAL RESPONSES

d. The information requested to be provided in Excel format is considered to be confidential and proprietary and is being filed under seal pursuant to a petition for confidential protection. Counsel for the Companies is continuing to undertake a reasonable and diligent search for other such documents and will reasonably supplement this response no later than Monday, July 20, 2015.

Certain documents responsive to this request are not being provided because they contain communications with counsel and the mental impressions of counsel, which information is protected from disclosure by the attorney-client privilege and the work product doctrine. The Company will file no later than Monday, July 20, 2015, a privilege log describing the responsive documents the Companies are not producing on the ground of attorney-client or work product privilege.

. . .

i. Counsel for the Companies has not yet found any non-privileged documents responsive to this request; however, counsel is continuing to undertake a reasonable and diligent search for other such documents and will reasonably supplement this response no later than Monday, July 20, 2015.

Certain documents responsive to this request are not being provided because they contain communications with counsel and the mental impressions of counsel, which

information is protected from disclosure by the attorney-client privilege and the work product doctrine. The Companies will file no later than Monday, July 20, 2015, a privilege log describing the responsive documents the Companies are not producing on the ground of attorney-client or work product privilege.

- j. ...
 - v. Counsel for the Companies has not yet found any documents responsive to this request; however, counsel is continuing to undertake a reasonable and diligent search for other such documents and will reasonably supplement this response no later than Monday, July 20, 2015.

SUPPLEMENTAL RESPONSES

d. See attached.

Certain documents responsive to this request are not being provided because they contain communications with counsel and the mental impressions of counsel, which information is protected from disclosure by the attorney-client privilege and the work product doctrine. The Companies are filing contemporaneously herewith a privilege log describing the responsive documents the Companies are not producing on the ground of attorney-client or work product privilege.

. . .

- i. All documents responsive to this request are not being provided because they contain communications with counsel and the mental impressions of counsel, which information is protected from disclosure by the attorney-client privilege and the work product doctrine. The Companies are filing contemporaneously herewith a privilege log describing the responsive documents the Companies are not producing on the ground of attorney-client or work product privilege.
- j. ...
 - v. No documents responsive to this request were found.

From: Tapp Sr., Kenny (Electric)(/O=LGE/OU=LOUISVILLE/CN=RECIPIENTS/CN=WEB/CN=TAPPK)

To: Needham, Meredith

CC: BCC:

Subject: FW: Sterling Material Ghent Gypsum disposal

Sent: 06/29/2015 06:41:39 AM -0400 (EDT)

Attachments:

Confidential and Privileged Attorney, Client Communication

From: Pfeiffer, Caryl

Sent: Thursday, October 27, 2011 9:08 AM

To: 'John Walters'

Cc: Tapp Sr., Kenny (Electric)

Subject: RE: Sterling Material Ghent Gypsum disposal

John

The assessment of disposal alternatives goes on in our Project Engineering area with support from the plants, Environmental Affairs, Legal, Fuels, etc. John Voyles, the VP of Transmission/Generation Services, has oversight of that area and can be reached at 502-627-4762. Scott Straight, the Director of Project Engineering, is responsible for coordinating that assessment and can be reached at 502-627-2701.

Caryl

From: John Walters [mailto:johnwalters@sterlingventures.com]

Sent: Wednesday, October 26, 2011 11:38 AM

To: Pfeiffer, Caryl

Subject: Sterling Material Ghent Gypsum disposal

Caryl:

I know you have been on vacation for a couple of weeks, and your desk is probably overflowing. However, I would like to find out about who I should be talking to about the proposal for gypsum disposal at Ghent that I sent by email on September 19th.

I talked to Mike Dotson a couple of weeks ago, and he told me that disposal alternatives to the new proposed CCP landfill was not something your department handled. Has this been forwarded to another department? If so, who should I be contacting?

Any help would be appreciated.

Thanks.

John

John W. Walters, Jr.
Sterling Ventures, LLC
376 South Broadway
Lexington, KY 40508
Phone (859) 259-9600
Cell (859) 621-3990
Fax (859) 259-9601

johnwalters@sterlingventures.com

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Attachment to LG&E-KU Supplemental Response to Sterling Ventures Question No. 1-17(d)

Witnesses: Sinclair, Voyles, and Straight
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please notify us immediately by phone (859) 259-9600 and arrange for the destruction or return of this transmission to us.

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From: Pfeiffer, Caryl(/O=LGE/OU=LOUISVILLE/CN=RECIPIENTS/CN=E012383)

To: Smith, Timothy (Fuels); Joyce, Jeff; Tapp Sr., Kenny (Electric); Gilbert, Bill G.; Dotson, Mike; Puckett, Paul

CC: BCC:

Subject: RE: Ghent Gyspum Disposal

Sent: 09/19/2011 01:41:04 PM -0400 (EDT)

Attachments:

Are we going to get a meeting or conference call together to discuss this?

From: John Walters [mailto:johnwalters@sterlingventures.com]

Sent: Tuesday, September 13, 2011 5:15 PM

To: Smith, Timothy; Joyce, Jeff; Pfeiffer, Caryl; Tapp Sr., Kenny (Electric); Gilbert, Bill G.; Dotson, Mike; Puckett, Paul

Cc: Alex Boone

Subject: Ghent Gyspum Disposal

Please see attached

John W. Walters, Jr. Sterling Ventures, LLC 376 South Broadway Lexington, KY 40508 Phone (859) 259-9600 Cell 859-621-3990 Fax (859) 259-9601

johnwalters@sterlingventures.com

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From: John Walters(johnwalters@sterlingventures.com)

To: Joyce, Jeff; Pfeiffer, Caryl

CC: Alex Boone

BCC:

Subject: Sterling Ventures Gypsum Proposal Sent: 01/19/2012 02:49:01 PM -0500 (EST)

Attachments: Exhibit 1.pdf; Exhibit 2.pdf; Exhibit 3.pdf; Exhibit 4.pdf;

Jeff

I understand from Scott Straight that you are now in charge of doing the PVRR comparative analysis of Sterling's proposal to use the new landfill at Ghent for ash only, with gypsum disposal at our underground mine. Attached is our effort at a PVRR comparative analysis of all gypsum going to Sterling, verses into your new landfill. We based our comparative PVRR analysis on the projected O&M and capital cost for the landfill that KU filed with the PSC in 2009, and confirmed in 2011.

Attached Exhibit 1 is a general summary of our proposal, as well as the assumptions used in the PVRR analysis of that proposal. Exhibits 2 and 3 are PVRR analyses under two separate scenarios. The first, Exhibit 2, is a straight PVRR comparison to the landfill, as detailed in the 2009 filings with the PSC, versus using our underground limestone mine for gypsum beneficial reuse disposal. In this scenario, our proposal is the least cost alternative by \$260,498,235.00 (PVRR least cost alternative by \$86,599,008.00).

Exhibit 3 is a PVRR comparison assuming KU purchases scrubber limestone from Sterling, which is then backhauled to Ghent. Here, our proposal is the least cost alternative by \$342,795,003.00 (PVRR least cost alternative by \$109,405,671.00). In both PVRR analyses, \$222,368,117.00 of the saving comes from a reduction in Return on Equity from reduced capital costs. As you will see, Exhibit 3 assumes a delivered scrubber stone price of \$8.50 (\$7.00 stone with \$1.50 trucking allocation out of the \$4.50 round trip gypsum trucking), which based on documents filed with the PSC, should approximate the delivered cost of scrubber stone from Mulzer.

Exhibit 4 is the PVRR comparative analysis from Exhibits 2 and 3 in the table format that Charles Schram identified that you would use in your PVRR analysis of beneficial reuse opportunities.

I also understand from documents KU filed with the PSC that the landfill's CCP transport system cost may be significantly over the original projection, and that the projected capital cost of Phase I has increased from \$204,000,000 to \$283,000,000. Please note that the increase in the cost of Phase I has not been included in our PVRR analysis, and therefore the savings from our proposal may increase as a result of the additional capital required for Phase I.

As you can see from our projections, in addition to O&M cost savings, you can delay Phase II of the Ghent Landfill project by eleven years, and completely eliminate Phase III. You can also avoid purchasing gypsum handling equipment. However, these savings assume that all gypsum is beneficially reused at Sterling's underground mine starting with the opening of Phase I in 2013.

In Scott Straight's email to me indicating that you are now in charge of the PVRR comparative analysis, he stated that Sterling's proposal "could have merit in a few years to defer the next phased expansion of the landfill", but that "[t]he next phase of the landfill is years away...." I must admit that I am confused by Scott's conclusion. It would appear that if the ability to avoid placing gypsum in the Ghent landfill "could have merit in a few years," it also possibly has merit today. Our permit for your gypsum is approved and in place.

As indicated above, failing to take advantage of the Sterling opportunity in 2013 when the landfill opens would result in the unnecessary purchase of gypsum related equipment, and the placement of approximately 850,000 cubic yards per year of gypsum into the landfill, thereby reducing its life. The projected savings from our proposal between 2012 and 2019 (the projected opening of Phase II) is \$41,900,000.00, without backhauling limestone, and \$54,941,000.00 if you take advantage of the limestone backhaul option.

If you anticipate opening the landfill in 2013, planning needs to begin immediately if you are going to take advantage of our beneficial reuse opportunity. We need to address numerous details and logistics, as well as negotiate a contract. In addition, as indicated

Attachment to LG&E-KU Supplemental Response to Sterling Ventures Question No. 1-17(d) Witnesses: Sinclair, Voyles, and Straight

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above, the greatest saving potential for you occurs when you purchase hi-calcium scrubber limestone from Sterling. My understanding from documents filed with the PSC, the existing contract with Mulzer Crushed Stone for Ghent's scrubber limestone is a 9-year contract ending late 2014, with an "opt-out" provision in 2012. I also understand KU's normal practice is to enter into long terms contracts for scrubber stone. If you want to take full advantage of the potential savings, we would also need to negotiate a contract for limestone.

There are obviously numerous details we need to discuss in order for you to complete your own PVRR analysis of our proposal. Could you please let me know within the next couple of days if you are planning to do your PVRR analysis now, or as Scott indicated, you will be delaying that analysis for a few years?

Thank you for your consideration. I look forward to hearing from you.

John

John W. Walters, Jr. Sterling Ventures, LLC 376 South Broadway Lexington, KY 40508 Phone (859) 259-9600 Cell (859) 621-3990 Fax (859) 259-9601

johnwalters@sterlingventures.com

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GHENT STATION ALTERNATIVE FOR CCP/GYPSUM DISPOSAL

Background

Sterling Materials is an active underground limestone mine located in Verona, Kentucky, approximately 20 miles from Kentucky Utilities Company's Ghent Station. Sterling currently mines between 1,000,000 and 1,600,000 tons of limestone per year, and has been in operation since 2000.

In addition to producing limestone for the general aggregate construction market, Sterling also mines high calcium limestone for Mississippi Lime Company for use in Mississippi Lime's kiln located on Sterling's property. This high calcium limestone is also suitable for use as scrubber stone in Ghent's limestone FGD scrubber system.

In November 2010, Sterling obtained a Beneficial Reuse Special Waste Permit from the Kentucky Department of Environmental Protection, Division of Waste Management specifically allowing the beneficial reuse of Ghent's FGD gypsum in Sterling's mine.

KU has proposed building a new landfill at Ghent in three phases for an estimated total cost of \$360,000,000 to handle the plant's three coal combustion by-products ("CCPs") through 2037¹. KU forecasted the following wet storage CCP production volumes for Ghent Station (Cubic Yards):

Year	Fly Ash	Bottom Ash	Gypsum
2009	540,000	140,000	880,000
2010	550,000	150,000	1,090,000
2011	580,000	150,000	1,120,000
2012	550,000	150,000	1,060,000
2013	550,000	150,000	1,090,000

Source: Coal Combustion Byproduct Plan for Ghent Station June 2009 (the "Ghent CCP Plan", page 7)

Ghent's FGD gypsum is currently placed in a wet gypsum stacking pond. Ghent also has a contract to supply CertainTeed, Inc. with gypsum, and KU has estimated that CertainTeed will purchase approximately 222,000 cubic yards per year of gypsum from Ghent. As a result, Ghent will be required to continue diverting a portion of its gypsum production to the gypsum stacking pond.

Alternative Proposal for Gypsum Disposal at Sterling Materials' Mine

Sterling Materials is proposing that Ghent send all of its gypsum production (net of sales CertainTeed) to Sterling's mine for beneficial reuse, with Ghent's with the new landfill being used for ash disposal only. Sterling estimates that the PVRR cost saving from the beneficial reuse of Ghent's gypsum is at least \$80,000,000. The substantial saving are generated from the ability to significantly delay the construction of phase 2 of the landfill, completely eliminate phase 3, and eliminate gypsum related

¹ Phase I cost thru 2018 of \$203,969,979 as set forth in Revenue Requirement Summary for Project 30 – Ghent Landfill Phase I attached. Total project capital cost estimated to be \$360,000,000 per direct testimony of John Voyles before the Kentucky Public Service Commission in Case No. 2009-00197.

capital cost and expenses associated with the landfill (all gypsum continue to be placed in stacking pond for transfer to CertainTeed and Sterling Materials).

Sterling is not proposing that the Ghent landfill not be built, but rather that KU take advantage of Sterling's Beneficial Reuse Permit so that the life of the landfill can be extended, and capital and operating cost be eliminated, by diverting the gypsum that would have been placed in the landfill to Sterling's mine. The attached PVRR analysis assumes that all gypsum would be diverted beginning with the opening of the new landfill.

Assumptions in Ghent Project 30 PVRR Analysis

, E

- Total price for loading, hauling and fees to Sterling Materials of \$10.50 in 2013.
- 2. Net CCP production of approximately 868,000 cubic yards (1,090,000 222,000 to CertainTeed).
- 3. Cubic yards to ton conversion factor cy x 1.155 (based on Trans Ash conversion assumption of 1.3 MCY equals 1.5 million tons as hauled see page 10 of Ghent CCP Plan).
- 4. Reduce Phase I construction cost by \$53,110,000² by continuing to place gypsum temporarily in existing gypsum stacking pond until shipment to Sterling.

Dry Gypsum Handling System

\$36,800,000

Gypsum Fines Project

\$12,600,000

Gypsum Dewatering Facility Earthwork \$ 3,710,000

5. Phase III landfill construction cost eliminated. Phase II construction delayed from 2018 to 2030.

Phase I capacity – 14.7 MCY (See Ghent CCP Plan page 12)

Ash Production - 700,000 MCY (See Ghent CCP Plan page 7)

Phase I life until full - 21 years

6. Total Phase II and III construction costs - \$157,421,024 (timing and amounts of expenditures based retirement studies analysis in PSC Case No. 2011-00162)

Phase II construction cost - \$40,000,000

Phase III construction cost - \$117,421,024

 Eliminate following Ghent Landfill Operating Expenses 2013 Estimates (See Ghent Landfill -Phase I attached)

Dry Gypsum Handling System	\$ 682,495
Hauling Gypsum to Landfill	
Loading	\$1,746,384
Phase I-2.25 mile round trip	\$3,997,156
Landfilling Gypsum	\$3,143,492

- 8. Continue 2018 Annual Depreciation Rate of 2.7899% on Eligible Capital through 2037
- 9. Continue 2018 Property Tax Expense Rate of .1259% on Eligible Capital through 2037
- 10. Apply KU O&M Escalation Rate of 6% and Discount Rate of 7.81% (See Ghent CCP Plan, page 22).

² See Ghent Landfill - Phase I attached.

Attachment to LG&E-KU Supplemental Response to Sterling Ventures Question No. 1-17(d)
Witnesses: Sinclair, Voyles, and Straight
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Gypsum Disposal at Sterling Materials		2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	Page 9 of 4
Revenue Requirement												
. Eligible Plant	\$	4,321,671 \$	46,478,846 \$	105,485,803 \$	177,577,356 \$	191,133,918 \$	201,941,953 \$	202,578,976 \$	203,078,976 \$	204,078,976 \$	212,078,976 \$	228,078,976
Less Gypsum Plant Requirements/Phase Delays	\$	- \$	(14,090,000) \$	(40,060,000) \$	(53,110,000) \$	(53,110,000) \$	(53,110,000) \$	(53,110,000) \$	(53,610,000) \$	(54,610,000) \$	(62,610,000) \$	(78,610,000)
Revised Eligible Plant	\$	4,321,671 \$	32,388,846 \$	65,425,803 \$	124,467,356 \$	138,023,918 \$	148,831,953 \$	149,468,976 \$	149,468,976 \$	149,468,976 \$	149,468,976 \$	149,468,976
Less Accumulated Depreciation					\$	(3,690,414) \$	(7,842,826) \$	(12,013,010) \$	(16,183,194) \$	(20,353,378) \$	(24,523,563) \$	(28,693,747)
Less Deferred Tax Balance					\$	(528,683) \$	(2,857,926) \$	(4,921,730) \$	(6,724,117) \$	(8,277,719) \$	(9,603,427) \$	(11,236,471)
Environmental Compliance Rate Base	\$	4,321,671 \$	32,388,846 \$	65,425,803 \$	124,467,356 \$	133,804,821 \$	138,131,202 \$	132,534,236 \$	126,561,665 \$	120,837,879 \$	115,341,986 \$	109,538,758
Rate of Return	Š	11.1%	10.97%	10.97%	10.97%	10.97%	10.97%	10.97% 14,539,006 \$	10.97% 13,883,815 \$	10.97% 13,255,915 \$	10.97% 12,653,016 \$	10.97% 12,016,402
Assumed Tons (1.155) 1,000,000 86.7500% Cubic yards 867,500	\$	480,509 \$	3,553,056 \$	7,177,211 \$	13,654,069 \$	14,678,389 \$	15,152,993 \$	14,539,006 \$	13,883,815 \$	13,255,915 \$	12,053,010 \$	12,016,402
Operating Expenses	Ś	84,800 \$	121,349 \$	128,630 \$	136,348 \$	19,003,308 \$	20,143,507 \$	21,352,117 \$	22,633,244 \$	23,991,239 \$	25,430,713 \$	26,956,556
less Gypsum to On-site Landfill	*	84,000 \$	121,545 9	120,030 9	\$	(9,569,527) \$	(10,143,699) \$	(10,752,321) \$	(11,397,460) \$	(12,081,307) \$	(12,806,186) \$	(13,574,557)
Gypsum to Sterling \$ 10.50					Ś	10,500,000 \$	11,130,000 \$	11,797,800 \$	12,505,668 \$	13,256,008 \$	14,051,369 \$	14,894,451
Net Operating	\$	84,800 \$	121,349 \$	128,630 \$	136,348 \$	19,933,781 \$	21,129,808 \$	22,397,596 \$	23,741,452 \$	25,165,940 \$	26,675,896 \$	28,276,450
Annual Depreciation	*	ο ησου φ	222,010 4	220,000 4	\$	3,690,414 \$	4,152,411 \$	4,170,184 \$	4,170,185 \$	4,170,184 \$	4,170,184 \$	4,170,184
Annual Property Tax Expense		\$	6,483 \$	69,718 \$	158,229 \$	266,366 \$	279,017 \$	286,798 \$	279,274 \$	271,517 \$	264,458 \$	274,825
Total OE	\$	84,800 \$	127,832 \$	198,348 \$	294,577 \$	23,890,561 \$	25,561,237 \$	26,854,579 \$	28,190,911 \$	29,607,640 \$	31,110,538 \$	32,721,458
		****			,			*****				
Total E(m) Gypsum to Sterling \$	460,435,348 \$	565,309 \$	3,680,888 \$	7,375,559 \$	13,948,646 \$	38,568,950 \$	40,714,230 \$	41,393,584 \$	42,074,725 \$	42,863,556 \$	43,763,554 \$	44,737,860
Total E(m) - Project 30 (See below) \$	547,034,356 \$	565,309 \$	5,226,561 \$	11,770,141 \$	19,774,813 \$	44,706,579 \$	46,601,539 \$	46,978,148 \$	47,430,316 \$	48,060,812 \$	49,736,723 \$	52,503,105
Difference PVRR 7.81% \$	(86,599,008) \$	- \$	(1,545,673) \$	(4,394,582) \$	(5,826,167) \$	(6,137,629) \$	(5,887,309) \$	(5,584,564) \$	(5,355,590) \$	(5,197,256) \$	(5,973,170) \$	(7,765,245)
Date		12/31/2009	12/31/2010	12/31/2011	12/31/2012	12/31/2013	12/31/2014	12/31/2015	12/31/2016	12/31/2017	12/31/2018	12/31/2019
Revenue Requirments Summary 2009 Amended Plan Project 30 Ghent Landfill Phase I												
See Exhibit B		2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019
									Start Phase II			
Revenue Requirement								\$	500,000 \$	1,000,000 \$	8,000,000 \$	16,000,000
Eligible Plant	\$	4,321,671 \$	46,478,846 \$	105,485,803 \$	177,577,356 \$	191,133,918 \$	201,941,953 \$	\$ 202,578,976 \$	500,000 \$ 203,078,976 \$	204,078,976 \$	212,078,976 \$	16,000,000 228,078,976
Eligible Plant Less Gypsum Plant Requirements/Phase Delays	\$	- \$	- \$	- \$	- \$	- \$	- \$	\$ 202,578,976 \$ - \$	500,000 \$ 203,078,976 \$ - \$	204,078,976 \$ - \$	212,078,976 \$ \$	228,078,976
Eligible Plant Less Gypsum Plant Requirements/Phase Delays Revised Eligible Plant					- \$ 177,577,356 \$	- \$ 191,133,918 \$	- \$ 201,941,953 \$	\$ 202,578,976 \$ - \$ 202,578,976 \$	500,000 \$ 203,078,976 \$ - \$ 203,078,976 \$	204,078,976 \$ - \$ 204,078,976 \$	212,078,976 \$ - \$ 212,078,976 \$	228,078,976 - 228,078,976
Eligible Plant Less Gypsum Plant Requirements/Phase Delays Revised Eligible Plant Less Accumulated Depreciation	\$	- \$	- \$	- \$	- \$ 177,577,356 \$ \$	- \$ 191,133,918 \$ (5,110,443) \$	\$ 201,941,953 \$ (10,744,623) \$	\$ 202,578,976 \$ - \$ 202,578,976 \$ (16,396,576) \$	500,000 \$ 203,078,976 \$ - \$ 203,078,976 \$ (22,062,480) \$	204,078,976 \$ - \$ 204,078,976 \$ (27,756,283) \$	212,078,976 \$ - \$ 212,078,976 \$ (33,673,286) \$	228,078,976 - 228,078,976 (40,036,689)
Eligible Plant Less Gypsum Plant Requirements/Phase Delays Revised Eligible Plant Less Accumulated Depreciation Less Deferred Tax Balance	\$ \$	- \$ 4,321,671 \$	- \$ 46,478,846 \$	- \$ 105,485,803 \$	- \$ 177,577,356 \$ \$ \$	- \$ 191,133,918 \$ (5,110,443) \$ (732,114) \$	\$ 201,941,953 \$ (10,744,623) \$ (3,915,341) \$	\$ 202,578,976 \$ - \$ 202,578,976 \$ (16,396,576) \$ (6,717,677) \$	500,000 \$ 203,078,976 \$ - \$ 203,078,976 \$ (22,062,480) \$ (9,166,960) \$	204,078,976 \$ - \$ 204,078,976 \$ (27,756,283) \$ (11,288,480) \$	212,078,976 \$ - \$ 212,078,976 \$ (33,673,286) \$ (13,186,459) \$	228,078,976 228,078,976 (40,036,689) (15,678,367)
Eligible Plant Less Gypsum Plant Requirements/Phase Delays Revised Eligible Plant Less Accumulated Depreciation Less Deferred Tax Balance Environmental Compliance Rate Base	\$	- \$ 4,321,671 \$	- \$ 46,478,846 \$ 46,478,846 \$	- \$ 105,485,803 \$ 105,485,803 \$	- \$ 177,577,356 \$ \$ \$ 177,577,356 \$	- \$ 191,133,918 \$ (5,110,443) \$ (732,114) \$ 185,291,361 \$	\$ 201,941,953 \$ (10,744,623) \$ (3,915,341) \$ 187,281,989 \$	\$ 202,578,976 \$ - \$ 202,578,976 \$ (16,396,576) \$ (6,717,677) \$ 179,464,723 \$	500,000 \$ 203,078,976 \$ - \$ 203,078,976 \$ (22,062,480) \$ (9,166,960) \$ 171,849,536 \$	204,078,976 \$ - \$ 204,078,976 \$ (27,756,283) \$ (11,288,480) \$ 165,034,213 \$	212,078,976 \$ - \$ 212,078,976 \$ (33,673,286) \$ (13,186,459) \$ 165,219,232 \$	228,078,976 - 228,078,976 (40,036,689) (15,678,367) 172,363,920
Eligible Plant Less Gypsum Plant Requirements/Phase Delays Revised Eligible Plant Less Accumulated Depreciation Less Deferred Tax Balance	\$	- \$ 4,321,671 \$ 4,321,671 \$ 11.1%	- \$ 46,478,846 \$ 46,478,846 \$ 10.97%	- \$ 105,485,803 \$ 105,485,803 \$ 10,97%	- \$ 177,577,356 \$ \$ \$ 177,577,356 \$ 10.97%	- \$ 191,133,918 \$ (5,110,443) \$ (732,114) \$ 185,291,361 \$ 10.97%	\$ 201,941,953 \$ (10,744,623) \$ (3,915,341) \$ 187,281,989 \$ 10.97%	202,578,976 \$	500,000 \$ 203,078,976 \$	204,078,976 \$ - \$ 204,078,976 \$ (27,756,283) \$ (11,288,480) \$ 165,034,213 \$ 10.97%	212,078,976 \$ - \$ 212,078,976 \$ (33,673,286) \$ (13,186,459) \$ 165,219,232 \$ 10.97%	228,078,976 228,078,976 (40,036,689) (15,678,367) 172,363,920 10.97%
Eligible Plant Less Gypsum Plant Requirements/Phase Delays Revised Eligible Plant Less Accumulated Depreciation Less Deferred Tax Balance Environmental Compliance Rate Base	\$ \$	- \$ 4,321,671 \$	- \$ 46,478,846 \$ 46,478,846 \$	- \$ 105,485,803 \$ 105,485,803 \$	- \$ 177,577,356 \$ \$ \$ 177,577,356 \$	- \$ 191,133,918 \$ (5,110,443) \$ (732,114) \$ 185,291,361 \$	\$ 201,941,953 \$ (10,744,623) \$ (3,915,341) \$ 187,281,989 \$	\$ 202,578,976 \$ - \$ 202,578,976 \$ (16,396,576) \$ (6,717,677) \$ 179,464,723 \$	500,000 \$ 203,078,976 \$ - \$ 203,078,976 \$ (22,062,480) \$ (9,166,960) \$ 171,849,536 \$	204,078,976 \$ - \$ 204,078,976 \$ (27,756,283) \$ (11,288,480) \$ 165,034,213 \$	212,078,976 \$ - \$ 212,078,976 \$ (33,673,286) \$ (13,186,459) \$ 165,219,232 \$	228,078,976 - 228,078,976 (40,036,689) (15,678,367) 172,363,920
Eligible Plant Less Gypsum Plant Requirements/Phase Delays Revised Eligible Plant Less Accumulated Depreciation Less Deferred Tax Balance Environmental Compliance Rate Base Rate of Return	\$	- \$ 4,321,671 \$ 4,321,671 \$ 11.1%	- \$ 46,478,846 \$ 46,478,846 \$ 10.97%	- \$ 105,485,803 \$ 105,485,803 \$ 10,97%	- \$ 177,577,356 \$ \$ \$ 177,577,356 \$ 10.97%	- \$ 191,133,918 \$ (5,110,443) \$ (732,114) \$ 185,291,361 \$ 10.97%	\$ 201,941,953 \$ (10,744,623) \$ (3,915,341) \$ 187,281,989 \$ 10.97%	202,578,976 \$	500,000 \$ 203,078,976 \$	204,078,976 \$ - \$ 204,078,976 \$ (27,756,283) \$ (11,288,480) \$ 165,034,213 \$ 10.97%	212,078,976 \$ - \$ 212,078,976 \$ (33,673,286) \$ (13,186,459) \$ 165,219,232 \$ 10.97%	228,078,976 228,078,976 (40,036,689) (15,678,367) 172,363,920 10.97%
Eligible Plant Less Gypsum Plant Requirements/Phase Delays Revised Eligible Plant Less Accumulated Depreciation Less Deferred Tax Balance Environmental Compliance Rate Base Rate of Return Difference \$	\$ \$	4,321,671 \$ 4,321,671 \$ 11.1% 480,509 \$	- \$ 46,478,846 \$ 46,478,846 \$ 10.97% 5,098,729 \$	- \$ 105,485,803 \$ 105,485,803 \$ 10,97% 11,571,793 \$	- \$ 177,577,356 \$ \$ \$ 177,577,356 \$ 177,577,356 \$ 10,97% 19,480,236 \$	- \$ 191,133,918 \$ (5,110,443) \$ (732,114) \$ 185,291,361 \$ 10.97% 20,326,462 \$	\$ 201,941,953 \$ (10,744,623) \$ (3,915,341) \$ 187,281,989 \$ 10,97% 20,544,834 \$	\$ 202,578,976 \$ \$ 202,578,976 \$ \$ 202,578,976 \$ \$ (6,717,677) \$ 179,464,723 \$ 10.97% 19,687,280 \$	500,000 \$ 203,078,976 \$ \$ 203,078,976 \$ {22,062,480 \$ {9,166,960 \$ 171,849,536 \$ 10.97% 18,851,894 \$	204,078,976 \$	212,078,976 \$	228,078,976 - 228,078,976 (40,036,689) (15,678,367) 172,363,920 10,97% 18,908,322
Eligible Plant Less Gypsum Plant Requirements/Phase Delays Revised Eligible Plant Less Accumulated Depreciation Less Deferred Tax Balance Environmental Compliance Rate Base Rate of Return Difference \$ Operating Expenses	\$ \$	4,321,671 \$ 4,321,671 \$ 11.1% 480,509 \$	- \$ 46,478,846 \$ 46,478,846 \$ 10.97% 5,098,729 \$	- \$ 105,485,803 \$ 105,485,803 \$ 10,97% 11,571,793 \$	- \$ 177,577,356 \$ \$ \$ 177,577,356 \$ 10.97% 19,480,236 \$ 136,348 \$	- \$ 191,133,918 \$ (5,110,443) \$ (732,114) \$ 185,291,361 \$ 10.97% 20,326,462 \$ 19,003,308 \$	- \$ 201,941,953 \$ (10,744,623) \$ (3,915,341) \$ 187,281,989 \$ 10.97% 20,544,834 \$ 20,143,507 \$	202,578,976 \$ 202,578,976 \$ (16,396,576) \$ (6,71,677) \$ 179,464,723 \$ 10.97% 19,687,280 \$ 21,352,117 \$	500,000 \$ 203,078,976 \$ \$ 203,078,976 \$ (22,062,480) \$ (9,166,960) \$ 171,849,536 \$ 10.97% 18,851,894 \$ 22,633,244 \$	204,078,976 \$	212,078,976 \$	228,078,976 228,078,976 (40,036,689) (15,678,367) 172,363,920 10,97% 18,908,322 26,956,556
Eligible Plant Less Gypsum Plant Requirements/Phase Delays Revised Eligible Plant Less Accumulated Depreciation Less Deferred Tax Balance Environmental Compliance Rate Base Rate of Return Difference \$ Operating Expenses Jess Gypsum to On-site Landfill	\$ \$	4,321,671 \$ 4,321,671 \$ 11.1% 480,509 \$	- \$ 46,478,846 \$ 46,478,846 \$ 10.97% 5,098,729 \$	- \$ 105,485,803 \$ 105,485,803 \$ 10,97% 11,571,793 \$	- \$ 177,577,356 \$ \$ \$ 177,577,356 \$ 10.97% 19,480,236 \$ 136,348 \$	191,133,918 \$ (5,110,443) \$ (732,114) \$ 185,291,361 \$ 10,97% 20,326,462 \$ 19,003,308 \$ - \$	201,941,953 \$ 201,744,623 \$ (10,744,623) \$ (3,915,341) \$ 187,281,989 \$ 10,97% 20,544,834 \$ 20,143,507 \$ \$	\$ 202,578,976 \$ 202,578,976 \$ (16,396,576) \$ (6,717,677) \$ 179,464,723 \$ 10,97% 19,687,280 \$ 21,352,117 \$ \$ \$	500,000 \$ 203,078,976 \$ \$ 203,078,976 \$ \$ (22,062,480) \$ (9,166,960) \$ 171,849,536 \$ 10.97% 18,851,894 \$ 22,633,244 \$ \$ \$	204,078,976 \$ 204,078,976 \$ (27,756,283) \$ (11,288,480) \$ 165,034,213 \$ 10,97% 18,104,253 \$ 23,991,239 \$. \$	212,078,976 \$ 212,078,976 \$ 33,673,286 \$ (13,186,459) \$ 165,219,232 \$ 10,97% 18,124,550 \$ 25,430,713 \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	228,078,976
Eligible Plant Less Gypsum Plant Requirements/Phase Delays Revised Eligible Plant Less Accumulated Depreciation Less Deferred Tax Balance Environmental Compliance Rate Base Rate of Return Difference \$ Operating Expenses less Gypsum to On-site Landfill Gypsum to Sterling	\$ \$	4,321,671 \$ 4,321,671 \$ 11.1% 480,509 \$	46,478,846 \$ 46,478,846 \$ 10.97% 5,098,729 \$ 121,349 \$	105,485,803 \$ 105,485,803 \$ 10,97% 11,571,793 \$ 128,630 \$	177,577,356 \$ \$ \$ 177,577,356 \$ \$ 10.97% \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	191,133,918 \$ (5,110,443) \$ (732,114) \$ 185,291,361 \$ 10.97% 20,326,462 \$ 19,003,308 \$ -	201,941,953 \$ (10,744,623) \$ (3,915,341) \$ 187,281,989 \$ 10,97% 20,544,834 \$ 20,143,507 \$ \$ 20,143,507 \$ 5,634,180 \$	202,578,976 \$ 202,578,976 \$ (16,396,576) \$ (6,717,677) \$ 179,464,723 \$ 10.97% 19,687,280 \$ 21,352,117 \$ 5,651,953 \$	203,078,976 \$ 203,078,976 \$ (22,062,480) \$ (9,166,960) \$ 171,849,536 \$ 10.97% 22,633,244 \$ 22,633,244 \$ 5,665,904 \$	204,078,976 \$ 204,078,976 \$ (27,756,283) \$ (11,288,480) \$ 165,034,213 \$ 10,97% 18,104,253 \$ 23,991,239 \$ 5,693,803 \$	212,078,976 \$ 212,078,976 \$ 33,673,286 \$ (13,186,459) \$ 165,219,232 \$ 10,97% 25,430,713 \$ 25,430,713 \$ 5,917,003 \$	228,078,976
Eligible Plant Less Gypsum Plant Requirements/Phase Delays Revised Eligible Plant Less Accumulated Depreciation Less Deferred Tax Balance Environmental Compliance Rate Base Rate of Return Difference \$ Operating Expenses less Gypsum to On-site Landfill Gypsum to Sterling Net Operating Annual Depreciation Annual Property Tax Expense	\$ \$ \$. \$	4,321,671 \$ 4,321,671 \$ 11.1% 480,509 \$ 84,800 \$	46,478,846 \$ 46,478,846 \$ 10.97% 5,098,729 \$ 121,349 \$ 121,349 \$ 6,483 \$	105,485,803 \$ 105,485,803 \$ 10,97% 11,571,793 \$ 128,630 \$ 128,630 \$ 69,718 \$	177,577,356 \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	191,133,918 \$ (5,110,443) \$ (732,114) \$ 185,291,361 \$ 10,97% 20,326,462 \$ 19,003,308 \$. \$. \$ 19,003,308 \$ 5,110,443 \$ 266,366 \$	201,941,953 \$ (10,744,623) \$ (3,915,341) \$ 187,281,989 \$ 10.97% 20,544,834 \$ 20,143,507 \$ \$ 20,143,507 \$ \$ 5,634,180 \$ 229,017 \$	202,578,976 \$ 202,578,976 \$ (16,396,576) \$ (6,717,677) \$ 179,464,723 \$ 10,97% 21,352,117 \$ 21,352,117 \$ 5,651,953 \$ 286,798 \$	500,000 \$ 203,078,976 \$ \$ 203,078,976 \$ \$ (22,062,480) \$ (9,166,960) \$ 171,849,536 \$ 10.97% 22,633,244 \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	204,078,976 \$	212,078,976 \$	228,078,976
Eligible Plant Less Gypsum Plant Requirements/Phase Delays Revised Eligible Plant Less Accumulated Depreciation Less Deferred Tax Balance Environmental Compliance Rate Base Rate of Return Difference \$ Operating Expenses less Gypsum to On-site Landfill Gypsum to Sterling Net Operating Annual Depreciation	\$ \$	4,321,671 \$ 4,321,671 \$ 11.1% 480,509 \$	46,478,846 \$ 46,478,846 \$ 10.97% 5,098,729 \$ 121,349 \$	105,485,803 \$ 105,485,803 \$ 10,97% 11,571,793 \$ 128,630 \$	177,577,356 \$ \$ \$ 177,577,356 \$ \$ 10.97% \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	191,133,918 \$ (5,110,443) \$ (732,114) \$ 185,291,361 \$ 10.97% 20,326,462 \$ 19,003,308 \$ -	201,941,953 \$ (10,744,623) \$ (3,915,341) \$ 187,281,989 \$ 10,97% 20,544,834 \$ 20,143,507 \$ \$ 20,143,507 \$ 5,634,180 \$	202,578,976 \$ 202,578,976 \$ (16,396,576) \$ (6,717,677) \$ 179,464,723 \$ 10.97% 19,687,280 \$ 21,352,117 \$ 5,651,953 \$	203,078,976 \$ 203,078,976 \$ (22,062,480) \$ (9,166,960) \$ 171,849,536 \$ 10.97% 22,633,244 \$ 22,633,244 \$ 5,665,904 \$	204,078,976 \$ 204,078,976 \$ (27,756,283) \$ (11,288,480) \$ 165,034,213 \$ 10,97% 18,104,253 \$ 23,991,239 \$ 5,693,803 \$	212,078,976 \$ 212,078,976 \$ 33,673,286 \$ (13,186,459) \$ 165,219,232 \$ 10,97% 25,430,713 \$ 25,430,713 \$ 5,917,003 \$	228,078,976
Eligible Plant Less Gypsum Plant Requirements/Phase Delays Revised Eligible Plant Less Accumulated Depreciation Less Deferred Tax Balance Environmental Compliance Rate Base Rate of Return Difference \$ Operating Expenses less Gypsum to On-site Landfill Gypsum to Sterling Net Operating Annual Depreciation Annual Property Tax Expense Total OE	\$ \$ \$	4,321,671 \$ 4,321,671 \$ 11.1% 480,509 \$ 84,800 \$ 84,800 \$	46,478,846 \$ 46,478,846 \$ 10.97% 5,098,729 \$ 121,349 \$ 121,349 \$ 6,483 \$ 127,832 \$	105,485,803 \$ 105,485,803 \$ 10,97% 11,571,793 \$ 128,630 \$ 128,630 \$ 69,718 \$ 198,348 \$	177,577,356 \$ \$ 177,577,356 \$ \$ 10,97% 19,480,236 \$ 136,348 \$ \$ \$ 136,348 \$ \$ \$ 158,229 \$ 294,577 \$	191,133,918 \$ (5,110,443) \$ (732,114) \$ 185,291,361 \$ 10,97% 20,326,462 \$ 19,003,308 \$ - \$ 19,003,308 \$ 5,110,443 \$ 266,366 \$ 24,380,117 \$	201,941,953 \$ (10,744,623) \$ (3,915,341) \$ 187,281,989 \$ 10,97% 20,544,834 \$ 20,143,507 \$ - \$ 20,143,507 \$ 5,634,180 \$ 279,017 \$ 26,056,704 \$	202,578,976 \$ 202,578,976 \$ (16,396,576) \$ (6,71,677) \$ 179,464,723 \$ 10.97% 21,352,117 \$ 21,352,117 \$ 5,651,953 \$ 286,798 \$ 27,290,868 \$	500,000 \$ 203,078,976 \$ \$ 203,078,976 \$ {22,062,480 } {9,166,960 } \$ 171,849,536 \$ 10.97% 22,633,244 \$ \$ \$ 22,633,244 \$ \$ 5,665,904 \$ \$ 279,274 \$ \$ 28,578,421 \$	204,078,976 \$ 204,078,976 \$ (27,756,283) \$ (11,288,480) \$ 165,034,213 \$ 10,97% 18,104,253 \$ 23,991,239 \$ 23,991,239 \$ 5,693,803 \$ 271,517 \$ 29,956,559 \$	212,078,976 \$ 212,078,976 \$ 33,673,286 \$ (13,186,459 \$ 165,219,232 \$ 10,97% 25,430,713 \$ 25,430,713 \$ 5,917,003 \$ 264,458 \$ 31,612,174 \$	228,078,976
Eligible Plant Less Gypsum Plant Requirements/Phase Delays Revised Eligible Plant Less Accumulated Depreciation Less Deferred Tax Balance Environmental Compliance Rate Base Rate of Return Difference Operating Expenses less Gypsum to On-site Landfill Gypsum to Sterling Net Operating Annual Depreciation Annual Property Tax Expense Total OE Total E(m) Gypsum to On-site Landfill as Calculated	\$ \$ \$	4,321,671 \$ 4,321,671 \$ 11.1% 480,509 \$ 84,800 \$ \$ 84,800 \$ \$ 565,309 \$	46,478,846 \$ 46,478,846 \$ 10.97% 5,098,729 \$ 121,349 \$ 121,349 \$ 6,483 \$ 127,832 \$ 5,226,561 \$	105,485,803 \$ 105,485,803 \$ 10,97% 11,571,793 \$ 128,630 \$ 128,630 \$ 69,718 \$ 198,348 \$ 11,770,141 \$	177,577,356 \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	191,133,918 \$ (5,110,443) \$ (732,114) \$ 185,291,361 \$ 10.97% 20,326,462 \$ 19,003,308 \$ 19,003,308 \$ 5,110,443 \$ 5,110,443 \$ 266,366 \$ 24,380,117 \$ 44,706,579 \$	201,941,953 \$ (10,744,623) \$ (3,915,341) \$ 187,281,989 \$ 10,97% 20,544,834 \$ 20,143,507 \$ \$ 20,143,507 \$ \$ 20,143,507 \$ \$ 20,143,507 \$ \$ 20,143,507 \$ \$ 46,601,539 \$	202,578,976 \$ 202,578,976 \$ (16,396,576) \$ (16,717,677) \$ 179,464,723 \$ 10,97% 19,687,280 \$ 21,352,117 \$ 5,651,953 \$ 286,798 \$ 27,290,868 \$ 46,978,148 \$	500,000 \$ 203,078,976 \$ \$ 203,078,976 \$ \$ (22,062,480) \$ (9,166,960) \$ 171,849,536 \$ 10.97% 22,633,244 \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	204,078,976 \$ 204,078,976 \$ (27,756,283) \$ (11,288,480) \$ 165,034,213 \$ 10,97% 18,104,253 \$ 23,991,239 \$. \$. \$. \$. \$. \$. \$. \$. \$. \$.	212,078,976 \$ \$ 212,078,976 \$ \$ 212,078,976 \$ \$ (33,673,286) \$ (13,186,459) \$ 165,219,232 \$ \$ 10,97% 25,430,713 \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	228,078,976
Eligible Plant Less Gypsum Plant Requirements/Phase Delays Revised Eligible Plant Less Accumulated Depreciation Less Deferred Tax Balance Environmental Compliance Rate Base Rate of Return Difference \$ Operating Expenses less Gypsum to On-site Landfill Gypsum to Sterling Net Operating Annual Depreciation Annual Property Tax Expense Total OE	\$ \$ \$	4,321,671 \$ 4,321,671 \$ 11.1% 480,509 \$ 84,800 \$ 84,800 \$	46,478,846 \$ 46,478,846 \$ 10.97% 5,098,729 \$ 121,349 \$ 121,349 \$ 6,483 \$ 127,832 \$	105,485,803 \$ 105,485,803 \$ 10,97% 11,571,793 \$ 128,630 \$ 128,630 \$ 69,718 \$ 198,348 \$	177,577,356 \$ \$ 177,577,356 \$ \$ 10,97% 19,480,236 \$ 136,348 \$ \$ \$ 136,348 \$ \$ \$ 158,229 \$ 294,577 \$	191,133,918 \$ (5,110,443) \$ (732,114) \$ 185,291,361 \$ 10,97% 20,326,462 \$ 19,003,308 \$ - \$ 19,003,308 \$ 5,110,443 \$ 266,366 \$ 24,380,117 \$	201,941,953 \$ (10,744,623) \$ (3,915,341) \$ 187,281,989 \$ 10,97% 20,544,834 \$ 20,143,507 \$ - \$ 20,143,507 \$ 5,634,180 \$ 279,017 \$ 26,056,704 \$	202,578,976 \$ 202,578,976 \$ (16,396,576) \$ (6,71,677) \$ 179,464,723 \$ 10.97% 21,352,117 \$ 21,352,117 \$ 5,651,953 \$ 286,798 \$ 27,290,868 \$	500,000 \$ 203,078,976 \$ \$ 203,078,976 \$ {22,062,480 } {9,166,960 } \$ 171,849,536 \$ 10.97% 22,633,244 \$ \$ \$ 22,633,244 \$ \$ 5,665,904 \$ \$ 279,274 \$ \$ 28,578,421 \$	204,078,976 \$ 204,078,976 \$ (27,756,283) \$ (11,288,480) \$ 165,034,213 \$ 10,97% 18,104,253 \$ 23,991,239 \$ 23,991,239 \$ 5,693,803 \$ 271,517 \$ 29,956,559 \$	212,078,976 \$ 212,078,976 \$ 33,673,286 \$ (13,186,459 \$ 165,219,232 \$ 10,97% 25,430,713 \$ 25,430,713 \$ 5,917,003 \$ 264,458 \$ 31,612,174 \$	228,078,976
Eligible Plant Less Gypsum Plant Requirements/Phase Delays Revised Eligible Plant Less Accumulated Depreciation Less Deferred Tax Balance Environmental Compliance Rate Base Rate of Return Difference Operating Expenses less Gypsum to On-site Landfill Gypsum to Sterling Annual Depreciation Annual Property Tax Expense Total OE Total E(m) Gypsum to On-site Landfill as Calculated Total E(m) Gypsum to On-site Landfill per KU	\$ \$ \$	4,321,671 \$ 4,321,671 \$ 11.1% 480,509 \$ 84,800 \$ 84,800 \$ \$4,800 \$ \$565,309 \$ \$565,309 \$	46,478,846 \$ 46,478,846 \$ 10.97% 5,098,729 \$ 121,349 \$ 121,349 \$ 46,483 \$ 127,832 \$ 5,226,561 \$ 5,226,561 \$	105,485,803 \$ 105,485,803 \$ 10,97% 11,571,793 \$ 128,630 \$ 128,630 \$ 69,718 \$ 198,348 \$ 11,770,141 \$ 11,769,378 \$	177,577,356 \$ 177,577,356 \$ 10.97% 19,480,236 \$ 136,348 \$ \$ 136,348 \$ \$ 158,229 \$ 294,577 \$ 19,774,813 \$ 19,774,813 \$	191,133,918 \$ (5,110,443) \$ (732,114) \$ 185,291,361 \$ 10.97% 20,326,462 \$ 19,003,308 \$ - \$ - \$ 19,003,308 \$ 5,110,443 \$ 266,366 \$ 24,380,117 \$ 44,705,239 \$	201,941,953 \$ (10,744,623) \$ (3,915,341) \$ 187,281,989 \$ 10.97% 20,544,834 \$ 20,143,507 \$	202,578,976 \$ 202,578,976 \$ (16,396,576) \$ (6,71,677) \$ 179,464,723 \$ 10,97% 21,352,117 \$ 21,352,117 \$ 5,651,953 \$ 221,352,117 \$ 5,651,953 \$ 27,290,868 \$ 46,978,148 \$ 46,976,843 \$	500,000 \$ 203,078,976 \$ \$ 203,078,976 \$ (22,062,480) \$ 171,849,536 \$ 10.97% 22,633,244 \$ \$ \$ 22,633,244 \$ \$ 5,665,904 \$ 279,274 \$ 28,578,421 \$ 47,430,316 \$ 47,458,553 \$	204,078,976 \$ 204,078,976 \$ (27,756,283) \$ (11,288,480) \$ 165,034,213 \$ 10,97% 18,104,253 \$ 23,991,239 \$ 23,991,239 \$ 5,693,803 \$ 271,517 \$ 29,956,559 \$ 48,060,812 \$ 48,044,547 \$	212,078,976 \$ 212,078,976 \$ (33,673,286) \$ (13,186,459) \$ 165,219,232 \$ 10,97% 25,430,713 \$ 25,430,713 \$ 5,917,003 \$ 264,458 \$ 31,612,174 \$ 49,736,723 \$ 48,653,648	228,078,976
Eligible Plant Less Gypsum Plant Requirements/Phase Delays Revised Eligible Plant Less Accumulated Depreciation Less Deferred Tax Balance Environmental Compliance Rate Base Rate of Return Difference Operating Expenses less Gypsum to On-site Landfill Gypsum to Sterling Net Operating Annual Depreciation Annual Property Tax Expense Total OE Total E(m) Gypsum to On-site Landfill as Calculated	\$ \$ \$	4,321,671 \$ 4,321,671 \$ 11.1% 480,509 \$ 84,800 \$ \$ 84,800 \$ \$ 565,309 \$	46,478,846 \$ 46,478,846 \$ 10.97% 5,098,729 \$ 121,349 \$ 121,349 \$ 6,483 \$ 127,832 \$ 5,226,561 \$	105,485,803 \$ 105,485,803 \$ 10,97% 11,571,793 \$ 128,630 \$ 128,630 \$ 69,718 \$ 198,348 \$ 11,770,141 \$	177,577,356 \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	191,133,918 \$ (5,110,443) \$ (732,114) \$ 185,291,361 \$ 10.97% 20,326,462 \$ 19,003,308 \$ 19,003,308 \$ 5,110,443 \$ 5,110,443 \$ 266,366 \$ 24,380,117 \$ 44,706,579 \$	201,941,953 \$ (10,744,623) \$ (3,915,341) \$ 187,281,989 \$ 10,97% 20,544,834 \$ 20,143,507 \$ \$ 20,143,507 \$ \$ 20,143,507 \$ \$ 20,143,507 \$ \$ 20,143,507 \$ \$ 46,601,539 \$	202,578,976 \$ 202,578,976 \$ (16,396,576) \$ (16,717,677) \$ 179,464,723 \$ 10,97% 19,687,280 \$ 21,352,117 \$ 5,651,953 \$ 286,798 \$ 27,290,868 \$ 46,978,148 \$	500,000 \$ 203,078,976 \$ \$ 203,078,976 \$ \$ (22,062,480) \$ (9,166,960) \$ 171,849,536 \$ 10.97% 22,633,244 \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	204,078,976 \$ 204,078,976 \$ (27,756,283) \$ (11,288,480) \$ 165,034,213 \$ 10,97% 18,104,253 \$ 23,991,239 \$. \$. \$. \$. \$. \$. \$. \$. \$. \$.	212,078,976 \$ \$ 212,078,976 \$ \$ 212,078,976 \$ \$ (33,673,286) \$ (13,186,459) \$ 165,219,232 \$ \$ 10,97% 25,430,713 \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	228,078,976
Eligible Plant Less Gypsum Plant Requirements/Phase Delays Revised Eligible Plant Less Accumulated Depreciation Less Deferred Tax Balance Environmental Compliance Rate Base Rate of Return Difference Operating Expenses less Gypsum to On-site Landfill Gypsum to Sterling Net Operating Annual Depreciation Annual Property Tax Expense Total OE Total E(m) Gypsum to On-site Landfill per KU Calculation Check Difference Site E/F Hauling cost of Ash 2.25 mile round trip	\$ \$ \$	4,321,671 \$ 4,321,671 \$ 11.1% 480,509 \$ 84,800 \$ 84,800 \$ \$4,800 \$ \$565,309 \$ \$565,309 \$	46,478,846 \$ 46,478,846 \$ 10.97% 5,098,729 \$ 121,349 \$ 121,349 \$ 46,483 \$ 127,832 \$ 5,226,561 \$ 5,226,561 \$	105,485,803 \$ 105,485,803 \$ 10,97% 11,571,793 \$ 128,630 \$ 128,630 \$ 69,718 \$ 198,348 \$ 11,770,141 \$ 11,769,378 \$	177,577,356 \$ 177,577,356 \$ 10.97% 19,480,236 \$ 136,348 \$ \$ \$ 136,348 \$ \$ \$ 158,229 \$ 294,577 \$ 19,774,813 \$ 19,774,813 \$ 19,773,528 \$ 1,285 \$	191,133,918 \$ (5,110,443) \$ (732,114) \$ 185,291,361 \$ 10.97% 20,326,462 \$ 19,003,308 \$ - \$ - \$ - \$ 19,003,308 \$ 5,110,443 \$ 266,366 \$ 24,380,117 \$ 44,706,579 \$ 44,705,239 \$ 1,340 \$ 2,822,723 \$	201,941,953 \$ (3,915,341) \$ 187,281,989 \$ 10,97% 20,544,834 \$ 20,143,507 \$ 5,634,180 \$ 279,017 \$ 26,056,704 \$ 46,601,539 \$ 46,600,208 \$ 1,331 \$ 2,992,086 \$	202,578,976 \$ 202,578,976 \$ (16,396,576) \$ (6,717,677) \$ 179,464,723 \$ 10,97% 21,352,117 \$ 21,352,117 \$ 5,651,953 \$ 286,798 \$ 27,290,868 \$ 46,978,148 \$ 46,976,843 \$ 1,305 \$ 3,171,612 \$	500,000 \$ 203,078,976 \$ \$ 203,078,976 \$ {22,062,480 } {9,166,960 } \$ 171,849,536 \$ 10.97% 22,633,244 \$ \$ \$ 22,633,244 \$ \$ 22,633,244 \$ \$ 5,665,904 \$ \$ 279,274 \$ 47,430,316 \$ 47,458,553 \$ \$ (28,237) \$	204,078,976 \$ 204,078,976 \$ (27,756,283) \$ (11,288,480) \$ 165,034,213 \$ 10,97% 18,104,253 \$ 23,991,239 \$ 5,693,803 \$ 271,517 \$ 29,956,559 \$ 48,060,812 \$ 48,044,547 \$ 16,265 \$	212,078,976 \$ \$ 212,078,976 \$ (33,673,286) \$ (13,186,459) \$ 165,219,232 \$ 10,97% 25,430,713 \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	228,078,976
Eligible Plant Less Gypsum Plant Requirements/Phase Delays Revised Eligible Plant Less Accumulated Depreciation Less Deferred Tax Balance Environmental Compliance Rate Base Rate of Return Difference \$ Operating Expenses less Gypsum to On-site Landfill Gypsum to Sterling Net Operating Annual Property Tax Expense Total OE Total E(m) Gypsum to On-site Landfill as Calculated Total E(m) Gypsum to On-site Landfill per KU Calculation Check Difference Site E/F Hauling cost of Ash 2.25 mile round trip Haul Road Maintenance	\$ \$ \$	4,321,671 \$ 4,321,671 \$ 11.1% 480,509 \$ 84,800 \$ 84,800 \$ \$4,800 \$ \$565,309 \$ \$565,309 \$	46,478,846 \$ 46,478,846 \$ 10.97% 5,098,729 \$ 121,349 \$ 121,349 \$ 46,483 \$ 127,832 \$ 5,226,561 \$ 5,226,561 \$	105,485,803 \$ 105,485,803 \$ 10,97% 11,571,793 \$ 128,630 \$ 128,630 \$ 69,718 \$ 198,348 \$ 11,770,141 \$ 11,769,378 \$	177,577,356 \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	191,133,918 \$ (5,110,443) \$ (732,114) \$ 185,291,361 \$ 10,97% 20,326,462 \$ 19,003,308 \$ 19,003,308 \$ 5,110,443 \$ 5,110,443 \$ 266,366 \$ 24,380,117 \$ 44,706,579 \$ 44,705,239 \$ 1,340 \$ 2,822,723 \$ 53,529 \$	201,941,953 \$ (10,744,623) \$ (3,915,341) \$ 187,281,989 \$ 10,97% 20,544,834 \$ 20,143,507 \$ 20,143,507 \$ 5,634,180 \$ 279,017 \$ 26,056,704 \$ 46,601,539 \$ 46,600,208 \$ 1,331 \$ 2,992,086 \$ 56,741 \$	\$ 202,578,976 \$ (16,396,576) \$ (16,396,576) \$ (67,71,677) \$ 179,464,723 \$ 10,97% 21,352,117 \$ \$ \$ \$ \$21,352,117 \$ \$ \$21,352,117 \$ \$5,651,953 \$ \$286,798 \$ 27,290,868 \$ 46,978,148 \$ 46,976,843 \$ 1,305 \$ 3,171,612 \$ 60,145 \$	500,000 \$ 203,078,976 \$ <pre> 203,078,976 \$ (22,062,480) \$ (9,166,960) \$ 171,849,536 \$ 10.97% 18,851,894 \$ 22,633,244 \$ 5,655,904 \$ 279,274 \$ 28,578,421 \$ 47,430,316 \$ 47,458,553 \$ (28,237) \$ 3,361,908 \$ 63,754 \$ </pre>	204,078,976 \$ 204,078,976 \$ (27,756,283) \$ (11,288,480) \$ 165,034,213 \$ 10,97% 18,104,253 \$ 23,991,239 \$ - \$ - \$ - \$ 23,991,239 \$ 23,991,239 \$ 23,991,239 \$ 248,040,547 \$ 48,060,812 \$ 48,044,547 \$ 16,265 \$	212,078,976 \$ \$ 212,078,976 \$ \$ 212,078,976 \$ \$ (33,673,286) \$ (13,186,459) \$ 165,219,232 \$ 10,97% 25,430,713 \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	228,078,976
Eligible Plant Less Gypsum Plant Requirements/Phase Delays Revised Eligible Plant Less Accumulated Depreciation Less Deferred Tax Balance Environmental Compliance Rate Base Rate of Return Difference Operating Expenses less Gypsum to On-site Landfill Gypsum to Sterling Net Operating Annual Depreciation Annual Property Tax Expense Total OE Total E(m) Gypsum to On-site Landfill per KU Calculation Check Difference Site E/F Hauling cost of Ash 2.25 mile round trip	\$ \$ \$	4,321,671 \$ 4,321,671 \$ 11.1% 480,509 \$ 84,800 \$ 84,800 \$ \$4,800 \$ \$565,309 \$ \$565,309 \$	46,478,846 \$ 46,478,846 \$ 10.97% 5,098,729 \$ 121,349 \$ 121,349 \$ 46,483 \$ 127,832 \$ 5,226,561 \$ 5,226,561 \$	105,485,803 \$ 105,485,803 \$ 10,97% 11,571,793 \$ 128,630 \$ 128,630 \$ 69,718 \$ 198,348 \$ 11,770,141 \$ 11,769,378 \$	177,577,356 \$ 177,577,356 \$ 10.97% 19,480,236 \$ 136,348 \$ \$ \$ 136,348 \$ \$ \$ 158,229 \$ 294,577 \$ 19,774,813 \$ 19,774,813 \$ 19,773,528 \$ 1,285 \$	191,133,918 \$ (5,110,443) \$ (732,114) \$ 185,291,361 \$ 10.97% 20,326,462 \$ 19,003,308 \$ - \$ - \$ - \$ 19,003,308 \$ 5,110,443 \$ 266,366 \$ 24,380,117 \$ 44,706,579 \$ 44,705,239 \$ 1,340 \$ 2,822,723 \$	201,941,953 \$ (3,915,341) \$ 187,281,989 \$ 10,97% 20,544,834 \$ 20,143,507 \$ 5,634,180 \$ 279,017 \$ 26,056,704 \$ 46,601,539 \$ 46,600,208 \$ 1,331 \$ 2,992,086 \$	202,578,976 \$ 202,578,976 \$ (16,396,576) \$ (6,717,677) \$ 179,464,723 \$ 10,97% 21,352,117 \$ 21,352,117 \$ 5,651,953 \$ 286,798 \$ 27,290,868 \$ 46,978,148 \$ 46,976,843 \$ 1,305 \$ 3,171,612 \$	500,000 \$ 203,078,976 \$ \$ 203,078,976 \$ {22,062,480 } {9,166,960 } \$ 171,849,536 \$ 10.97% 22,633,244 \$ \$ \$ 22,633,244 \$ \$ 22,633,244 \$ \$ 5,665,904 \$ \$ 279,274 \$ 47,430,316 \$ 47,458,553 \$ \$ (28,237) \$	204,078,976 \$ 204,078,976 \$ (27,756,283) \$ (11,288,480) \$ 165,034,213 \$ 10,97% 18,104,253 \$ 23,991,239 \$ 5,693,803 \$ 271,517 \$ 29,956,559 \$ 48,060,812 \$ 48,044,547 \$ 16,265 \$	212,078,976 \$ \$ 212,078,976 \$ (33,673,286) \$ (13,186,459) \$ 165,219,232 \$ 10,97% 25,430,713 \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	228,078,976

Revenue Requirments Summary												Pac
Gypsum Disposal at Sterling Materials		2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030
								Start Phase II				
Revenue Requirement							\$	500,000 \$	1,000,000 \$	8,000,000 \$	16,000,000 \$	11,000,000
Eligible Plant	\$	239,078,976 \$	242,578,976 \$	242,578,976 \$	242,578,976 \$	262,328,976 \$	302,328,976 \$	342,328,976 \$	360,000,000 \$		360,000,000 \$	360,000,000
Less Gypsum Plant Requirements/Phase Delays Revised Eligible Plant	\$	(89,610,000) \$	(93,110,000) \$	(93,110,000) \$	(93,110,000) \$	(112,860,000) \$	(152,860,000) \$	(192,360,000) \$	(209,031,024) \$		(185,031,024) \$	(174,031,024)
Less Accumulated Depreciation	\$	149,468,976 \$	149,468,976 \$	149,468,976 \$	149,468,976 \$	149,468,976 \$	149,468,976 \$	149,968,976 \$	150,968,976 \$		174,968,976 \$	185,968,976
Less Deferred Tax Balance	\$ \$		(37,034,115) \$	(41,204,299) \$	(45,374,483) \$	(49,544,667) \$	(53,714,851) \$	(57,898,986) \$	(62,111,020) \$		(71,427,888) \$	(76,616,422)
Environmental Compliance Rate Base	ş	(12,869,515) \$	(14,502,559) \$	(16,135,603) \$	(17,768,648) \$	(19,401,692) \$	(21,034,736) \$	(22,673,243) \$	(24,322,675) \$		(27,971,161) \$	(30,002,991)
Rate of Return	ş	103,735,530 \$ 10.97%	97,932,302 \$ 10,97%	92,129,073 \$ 10.97%	86,325,845 \$	80,522,617 \$	74,719,389 \$	69,396,748 \$	64,535,281 \$		75,569,927 \$	79,349,563
Assumed Tons (1.155) 1,000,000	\$	11,379,788 \$	10,743,173 \$	10,106,559 \$	10.97%	10.97%	10.97%	10.97%	10.97%	10.97%	10.97%	10.97%
86.7500% Cubic yards 867,500	\$	27,051 \$	661,940	10,106,559 \$	9,469,945 \$	8,833,331 \$	8,196,717 \$	7,612,823 \$	7,079,520 \$	7,280,044 \$	8,290,021 \$	8,704,647
Operating Expenses	Ś	28,601,000 \$	30,979,000 \$	32,837,740 \$	34.808.004 \$	36,896,485 \$	39,110,274 Ś	41,456,890 \$	43,944,304 \$	(1,912,962) 44,668,000 \$	47.240.000 ¢	FO 100 OCT
less Gypsum to On-site Landfill	Ś	(14,389,030) \$	(15,252,372) \$	(16,167,515) \$	(17,137,565) \$	(18,165,819) \$	(19,255,768) \$	(20,411,115) \$	(21,635,781) \$	(22,933,928) \$	47,348,080 \$ (24,309,964) \$	50,188,965 (25,768,562)
Gypsum to Sterling \$ 10.50	Š	15,788,118 \$	16,735,405 \$	17,739,529 \$	18,803,901 \$	19,932,135 \$	21,128,063 \$	22,395,747 \$	23,739,492 \$	25,163,861 \$	26,673,693 \$	28,274,114
Net Operating	Š	30,000,087 \$	32,462,033 \$	34,409,755 \$	36,474,340 \$	38,662,800 \$	40,982,568 \$	43,441,522 \$	46,048,014 \$	46,897,933 \$	49,711,809 \$	52,694,517
Annual Depreciation	Š	4,170,184 \$	4,170,184 \$	4,170,184 \$	4,170,184 \$	4,170,184 \$	4,170,184 \$	4,184,134 \$	4,212,034 \$	4,435,234 \$	4,881,634 \$	5,188,534
Annual Property Tax Expense	Ś	295,558 \$	309,813 \$	314,348 \$	314,348 \$	314,348 \$	339,942 \$	391,776 \$	443,610 \$	466,510 \$	466,510 \$	466,510
Total OE	\$	34,465,830 \$	36,942,030 \$	38,894,287 \$	40,958,872 \$	43,147,333 \$	45,492,694 \$	48,017,432 \$	50,703,658 \$	51,799,676 \$	55,059,952 \$	58,349,561
			11/11/11/11	/ 1/1	70,000,072 \$	10,217,000 \$	15) 152,051. \$	10,027,102 \$	30,703,038 3	31,753,070 3	33,033,332 \$	36,343,301
Total E(m) Gypsum to Sterling \$	460,435,348 \$	45,845,618 \$	47,685,203 \$	49,000,846 \$	50,428,818 \$	51,980,664 \$	53,689,411 \$	55,630,256 \$	57,783,179 \$	59,079,720 \$	63,349,973 \$	67,054,208
Total E(m) - Project 30 (See below) \$	547,034,356 \$	54,663,605 \$	56,504,274 \$	57,334,363 \$	58,271,442 \$	61,960,218 \$	68,415,929 \$	74,860,342 \$	78,297,820 \$	77,511,114 \$	78,657,892 \$	79,965,474
							,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,		, , ,	***************************************	, ,	,
Difference PVRR 7.81% \$	(86,599,008) \$	(8,817,987) \$	(8,819,070) \$	(8,333,517) \$	(7,842,625) \$	(9,979,554) \$	(14,726,518) \$	(19,230,086) \$	(20,514,642) \$	(18,431,393) \$	(15,307,918) \$	(12,911,267)
Date		12/31/2020	12/31/2021	12/31/2022	12/31/2023	12/31/2024	12/31/2025	12/31/2026	12/31/2027	12/31/2028	12/31/2029	12/31/2030
										,,	,,	,,
Revenue Requirments Summary												
2009 Amended Plan												
Project 30 Ghent Landfill Phase I												
See Exhibit B		2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030
					S	tart Phase III						
Revenue Requirement	\$	11,000,000 \$	3,500,000		\$	19,750,000 \$	40,000,000 \$	40,000,000 \$	17,671,024			
Eligible Plant	\$	239,078,976 \$	242,578,976 \$	242,578,976 \$	242,578,976 \$	262,328,976 \$	302,328,976 \$	342,328,976 \$	360,000,000 \$	360,000,000 \$	360,000,000 \$	360,000,000
Less Gypsum Plant Requirements/Phase Delays	\$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	-
Revised Eligible Plant	\$	239,078,976 \$	242,578,976 \$	242,578,976 \$	242,578,976 \$	262,328,976 \$	302,328,976 \$	342,328,976 \$	360,000,000 \$	360,000,000 \$	360,000,000 \$	360,000,000
Less Accumulated Depreciation	\$	(46,706,992) \$	(53,474,945) \$	(60,242,897) \$	(67,010,850) \$	(74,329,828) \$	(82,764,806) \$	(92,315,784) \$	(102,359,783) \$	(112,403,782) \$	(122,447,782) \$	(132,491,781)
Less Deferred Tax Balance	\$	(18,290,458) \$	(20,940,788) \$	(23,591,119) \$	(26,241,449) \$	(29,107,561) \$	(32,410,698) \$	(36,150,861) \$	(40,084,091) \$	(44,017,321) \$	(47,950,551) \$	(51,883,781)
Environmental Compliance Rate Base	\$	174,081,526 \$	168,163,243 \$	158,744,960 \$	149,326,677 \$	158,891,587 \$	187,153,472 \$	213,862,331 \$	217,556,126 \$	203,578,896 \$	189,601,667 \$	175,624,438
Rate of Return		10.97%	10.97%	10.97%	10.97%	10.97%	10.97%	10.97%	10.97%	10.97%	10.97%	10.97%
	<u>.</u> \$	19,096,743 \$	18,447,508 \$	17,414,322 \$	16,381,136 \$	17,430,407 \$	20,530,736 \$	23,460,698 \$	23,865,907 \$	22,332,605 \$	20,799,303 \$	19,266,001
Difference \$	- \$	27,051 \$	661,940						\$	(1,912,962)		
Operating Expenses	\$	28,601,000 \$	30,979,000 \$	32,837,740 \$	34,808,004 \$	36,896,485 \$	39,110,274 \$	41,456,890 \$	43,944,304 \$	44,668,000 \$	47,348,080 \$	50,188,965
less Gypsum to On-site Landfill	\$	\$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	-
Gypsum to Sterling	\$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	
Net Operating Annual Depreciation	\$	28,601,000 \$	30,979,000 \$	32,837,740 \$	34,808,004 \$	36,896,485 \$	39,110,274 \$	41,456,890 \$	43,944,304 \$	44,668,000 \$	47,348,080 \$	50,188,965
Annual Property Tax Expense	\$	6,670,303 \$	6,767,953 \$	6,767,953 \$	6,767,953 \$	7,318,978 \$	8,434,978 \$	9,550,978 \$	10,043,999 \$	10,043,999 \$	10,043,999 \$	10,043,999
Total OE	\$	295,558 \$	309,813 \$	314,348 \$	314,348 \$	314,348 \$	339,942 \$	391,776 \$	443,610 \$	466,510 \$	466,510 \$	466,510
Total OL	\$	35,566,861 \$	38,056,766 \$	39,920,041 \$	41,890,306 \$	44,529,811 \$	47,885,193 \$	51,399,644 \$	54,431,913 \$	55,178,509 \$	57,858,589 \$	60,699,474
Total E(m) Gypsum to On-site Landfill as Calculated	547,034,356 \$	54,663,605 \$	56,504,274 \$	57,334,363 \$	E0 271 442 6	61.060.040	CO 41E 020	74.000.040	70 207 222 1	77.544 *** *	70.557.552	70.00F :
Total E(m) Gypsum to On-site Landfill per KU	347,034,556 \$	24,005,005 \$	36,504,274 \$	57,334,363 \$	58,271,442 \$	61,960,218 \$	68,415,929 \$	74,860,342 \$	78,297,820 \$	77,511,114 \$	78,657,892 \$	79,965,474
rotal conf oypsain to on site candin per ko												
Calculation Check Difference												
Salada Check Shiel Chec												
Site E/F Hauling cost of Ash 2.25 mile round trip	Ś	4,244,332 \$	4,498,992 \$	4,768,931 \$	5,055,067 \$	5,358,371 \$	5,679,873 \$	6,020,666 \$	6,381,906 \$	6764920 4	7 170 700 6	7 600 052
Haul Road Maintenance	Ś	80,488 \$	4,498,992 \$ 85,317 \$	4,768,931 \$ 90,436 \$	95,862 \$	5,358,371 \$	5,679,873 \$ 107,711 \$	114,174 \$	6,381,906 \$ 121,024 \$	6,764,820 \$ 128,285 \$	7,170,709 \$	7,600,952
Total	Ś	4,324,820 \$	4,584,309 \$	4,859,367 \$	5,150,929 \$	5,459,985 \$	5,787,584 \$	6,134,839 \$	6,502,930 \$		135,982 \$	144,141
Reduce by 50% for Site M	Š	2,162,410 \$	2,292,154 \$	2,429,684 \$	2,575,465 \$	2,729,993 \$	2,893,792 \$	3,067,420 \$	3,251,465 \$	6,893,105 \$ 3,446,553 \$	7,306,692 \$ 3,653,346 \$	7,745,093 3,872,547
	(21,865,903)	_,===, .==	_,,_,	-,716.5/007 \$	2,313,703 3	2,123,333 3	2,000,102 3	5,007,420 \$	3,231,403 \$	3,440,333 \$	3,033,340 \$	3,012,341
710270 0	,,000,500,											

Attachment to LG&E-KU Supplemental Response to Sterling Ventures Question No. 1-17(d)
Witnesses: Sinclair, Voyles, and Straight
Page 11 of 43

Revenue Requirments Summary Gypsum Disposal at Sterling Materials	200	9 2010	2011	2012	2013	2014	2015	2016	2017	2018	Page 12 of 4
Revenue Requirement											
Eligible Plant	\$ 4,321,671	\$ 46,478,846 \$	105,485,803 \$	177,577,356 \$	191,133,918 \$	201,941,953 \$	202,578,976 \$	203,078,976 \$	204,078,976 \$	212,078,976 \$	228,078,976
Less Gypsum Plant Requirements/Phase Delays	\$ -	\$ (14,090,000) \$	(40,060,000) \$	(53,110,000) \$	(53,110,000) \$	(53,110,000) \$	(53,110,000) \$	(53,610,000) \$	(54,610,000) \$	(62,610,000) \$	(78,610,000)
Revised Eligible Plant	\$ 4,321,671	\$ 32,388,846 \$	65,425,803 \$	124,467,356 \$	138,023,918 \$	148,831,953 \$	149,468,976 \$	149,468,976 \$	149,468,976 \$	149,468,976 \$	149,468,976
Less Accumulated Depreciation				\$	(3,690,414) \$	(7,842,826) \$	(12,013,010) \$	(16,183,194) \$	(20,353,378) \$	(24,523,563) \$	(28,693,747)
Less Deferred Tax Balance				\$	(528,683) \$	(2,857,926) \$	(4,921,730) \$	(6,724,117) \$	(8,277,719) \$	(9,603,427) \$	(11,236,471)
Environmental Compliance Rate Base	\$ 4,321,671	\$ 32,388,846 \$	65,425,803 \$	124,467,356 \$	133,804,821 \$	138,131,202 \$	132,534,236 \$	126,561,665 \$	120,837,879 \$	115,341,986 \$	109,538,758
Rate of Return	11.19		10.97%	10.97%	10.97%	10.97%	10.97%	10.97%	10.97%	10.97%	10.97%
Assumed Tons (1.155) 1,000,000	\$ 480,509	\$ 3,553,056 \$	7,177,211 \$	13,654,069 \$	14,678,389 \$	15,152,993 \$	14,539,006 \$	13,883,815 \$	13,255,915 \$	12,653,016 \$	12,016,402
86.7500% Cubic yards 867,500		•									
Operating Expenses	\$ 84,800	\$ 121,349 \$	128,630 \$	136,348 \$	19,003,308 \$	20,143,507 \$	21,352,117 \$	22,633,244 \$	23,991,239 \$	25,430,713 \$	26,956,556
less Gypsum to On-site Landfill				\$	(9,569,527) \$	(10,143,699) \$	(10,752,321) \$	(11,397,460) \$	(12,081,307) \$	(12,806,186) \$	(13,574,557)
Gypsum to Sterling \$ 9.00				. \$	9,000,000 \$	9,540,000 \$	10,112,400 \$	10,719,144 \$	11,362,293 \$	12,044,030 \$	12,766,672
Net Operating	\$ 84,800	\$ 121,349 \$	128,630 \$	136,348 \$	18,433,781 \$	19,539,808 \$	20,712,196 \$	21,954,928 \$	23,272,224 \$	24,668,557 \$	26,148,671
Annual Depreciation				\$	3,690,414 \$	4,152,411 \$	4,170,184 \$	4,170,185 \$	4,170,184 \$	4,170,184 \$	4,170,184
Annual Property Tax Expense		\$ 6,483 \$	69,718 \$	158,229 \$	266,366 \$	279,017 \$	286,798 \$	279,274 \$	271,517 \$	264,458 \$	274,825
Total OE	\$ 84,800	\$ 127,832 \$	198,348 \$	294,577 \$	22,390,561 \$	23,971,237 \$	25,169,179 \$	26,404,387 \$	27,713,925 \$	29,103,199 \$	30,593,680
Total E(m) Gypsum to Sterling \$ 437,628,685	\$ 565,309	\$ 3,680,888 \$	7,375,559 \$	13,948,646 \$	37,068,950 \$	39,124,230 \$	39,708,184 \$	40,288,201 \$	40,969,840 .\$	41,756,215 \$	42,610,081
Total E(m) - Project 30 (See below) \$ 547,034,356	\$ 565,309	\$ 5,226,561 \$	11,770,141 \$	19,774,813 \$	44,706,579 \$	46,601,539 \$	46,978,148 \$	47,430,316 \$	48,060,812 \$	49,736,723 \$	52,503,105
Difference PVRR 7.81% \$ (109,405,671	\$ -	\$ (1,545,673) \$	(4,394,582) \$	(5,826,167) \$	(7,637,629) \$	(7,477,309) \$	(7,269,964) \$	(7,142,114) \$	(7,090,972) \$	(7,980,508) \$	(9,893,024)
Date	12/31/2009		12/31/2011	12/31/2012	12/31/2013	12/31/2014	12/31/2015	12/31/2016	12/31/2017	12/31/2018	12/31/2019
Revenue Requirments Summary 2009 Amended Plan Project 30 Ghent Landfill Phase I											
See Exhibit B	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019
								Start Phase II	4 000 000 \$	0.000.000 Å	16 000 000
Revenue Requirement							\$	500,000 \$	1,000,000 \$	8,000,000 \$	16,000,000
Eligible Plant	\$ 4,321,671		105,485,803 \$	177,577,356 \$	191,133,918 \$	201,941,953 \$	202,578,976 \$	203,078,976 \$	204,078,976 \$	212,078,976 \$	228,078,976
Less Gypsum Plant Requirements/Phase Delays	\$ -	\$ - \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	-
Revised Eligible Plant	\$ 4,321,671	\$ 46,478,846 \$	105,485,803 \$	177,577,356 \$	191,133,918 \$	201,941,953 \$	202,578,976 \$	203,078,976 \$	204,078,976 \$	212,078,976 \$	228,078,976
Less Accumulated Depreciation				\$	(5,110,443) \$	(10,744,623) \$	(16,396,576) \$	(22,062,480) \$	(27,756,283) \$	(33,673,286) \$	(40,036,689)
Less Deferred Tax Balance				\$	(732,114) \$	(3,915,341) \$	(6,717,677) \$	(9,166,960) \$	(11,288,480) \$	(13,186,459) \$	(15,678,367)
Environmental Compliance Rate Base	\$ 4,321,671		105,485,803 \$	177,577,356 \$	185,291,361 \$	187,281,989 \$	179,464,723 \$	171,849,536 \$	165,034,213 \$	165,219,232 \$	172,363,920
Rate of Return	11.1%	10.97%	10.97%	10.97%	10.97%	10.97%	10.97%	10.97%	10.97%	10.97%	10.97%
	\$ 480,509	\$ 5,098,729 \$	11,571,793 \$	19,480,236 \$	20,326,462 \$	20,544,834 \$	19,687,280 \$	18,851,894 \$	18,104,253 \$	18,124,550 \$	18,908,322
Difference \$ -											
Operating Expenses						00440507	04.050.447	00.000.044 A	22 224 222 4	05 400 740 6	20 050 550
less Gypsum to On-site Landfill	\$ 84,800	\$ 121,349 \$	128,630 \$	136,348 \$	19,003,308 \$	20,143,507 \$	21,352,117 \$	22,633,244 \$	23,991,239 \$	25,430,713 \$	26,956,556
Gypsum to Sterling	\$ 84,800	\$ 121,349 \$	128,630 \$	136,348 \$	- \$	- \$	- \$	- \$	- \$	- \$	26,956,556 -
.,				\$	- \$ - \$	- \$ - \$	- \$ - \$	- \$ - \$	- \$ - \$	- \$ - \$	-
Net Operating	\$ 84,800		128,630 \$ 128,630 \$	\$ \$ 136,348 \$	- \$ - \$ 19,003,308 \$	- \$ - \$ 20,143,507 \$	- \$ - \$ 21,352,117 \$	\$ - \$ 22,633,244 \$	- \$ - \$ 23,991,239 \$	- \$ - \$ 25,430,713 \$	- - 26,956,556
Net Operating Annual Depreciation		\$ 121,349 \$	128,630 \$	\$ \$ 136,348 \$ \$	\$ - \$ 19,003,308 \$ 5,110,443 \$	- \$ - \$ 20,143,507 \$ 5,634,180 \$	- \$ - \$ 21,352,117 \$ 5,651,953 \$	\$ 22,633,244 \$ 5,665,904 \$	- \$ - \$ 23,991,239 \$ 5,693,803 \$	- \$ - \$ 25,430,713 \$ 5,917,003 \$	26,956,556 6,363,403
Net Operating Annual Depreciation Annual Property Tax Expense	\$ 84,800	\$ 121,349 \$ \$ 6,483 \$	128,630 \$ 69,718 \$	\$ \$ 136,348 \$ \$ 158,229 \$	- \$ - \$ 19,003,308 \$ 5,110,443 \$ 266,366 \$	- \$ - \$ 20,143,507 \$ 5,634,180 \$ 279,017 \$	- \$ - \$ 21,352,117 \$ 5,651,953 \$ 286,798 \$	\$ 22,633,244 \$ 5,665,904 \$ 279,274 \$	- \$ - \$ 23,991,239 \$ 5,693,803 \$ 271,517 \$	- \$ - \$ 25,430,713 \$ 5,917,003 \$ 264,458 \$	26,956,556 6,363,403 274,825
Net Operating Annual Depreciation		\$ 121,349 \$ \$ 6,483 \$	128,630 \$	\$ \$ 136,348 \$ \$	\$ - \$ 19,003,308 \$ 5,110,443 \$	- \$ - \$ 20,143,507 \$ 5,634,180 \$	- \$ - \$ 21,352,117 \$ 5,651,953 \$	\$ 22,633,244 \$ 5,665,904 \$	- \$ - \$ 23,991,239 \$ 5,693,803 \$	- \$ - \$ 25,430,713 \$ 5,917,003 \$	26,956,556 6,363,403
Net Operating Annual Depreciation Annual Property Tax Expense Total OE	\$ 84,800	\$ 121,349 \$ \$ 6,483 \$ \$ 127,832 \$	128,630 \$ 69,718 \$ 198,348 \$	\$ \$ 136,348 \$ \$ 158,229 \$ 294,577 \$	19,003,308 \$ 5,110,443 \$ 266,366 \$ 24,380,117 \$	- \$ - \$ 20,143,507 \$ 5,634,180 \$ 279,017 \$ 26,056,704 \$	- \$ - \$ 21,352,117 \$ 5,651,953 \$ 286,798 \$ 27,290,868 \$	22,633,244 \$ 5,665,904 \$ 279,274 \$ 28,578,421 \$	- \$ - \$ 23,991,239 \$ 5,693,803 \$ 271,517 \$ 29,956,559 \$	- \$ - \$ 25,430,713 \$ 5,917,003 \$ 264,458 \$ 31,612,174 \$	26,956,556 6,363,403 274,825 33,594,783
Net Operating Annual Depreciation Annual Property Tax Expense Total OE Total E(m) Gypsum to On-site Landfill as Calculated 547,034,356	\$ 84,800 \$ 84,800 \$ 565,309	\$ 121,349 \$ \$ 6,483 \$ \$ 127,832 \$ \$ 5,226,561 \$	128,630 \$ 69,718 \$ 198,348 \$ 11,770,141 \$	\$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	19,003,308 \$ 5,110,443 \$ 266,366 \$ 24,380,117 \$	- \$ \$ 20,143,507 \$ 5,634,180 \$ 279,017 \$ 26,056,704 \$	- \$ - \$ 21,352,117 \$ 5,651,953 \$ 286,798 \$ 27,290,868 \$	\$ 22,633,244 \$ 5,665,904 \$ 279,274 \$ 28,578,421 \$ 47,430,316 \$	- \$ 23,991,239 \$ 5,693,803 \$ 271,517 \$ 29,956,559 \$ 48,060,812 \$	- \$ - \$ 25,430,713 \$ 5,917,003 \$ 264,458 \$ 31,612,174 \$	26,956,556 6,363,403 274,825
Net Operating Annual Depreciation Annual Property Tax Expense Total OE	\$ 84,800	\$ 121,349 \$ \$ 6,483 \$ \$ 127,832 \$ \$ 5,226,561 \$	128,630 \$ 69,718 \$ 198,348 \$	\$ \$ 136,348 \$ \$ 158,229 \$ 294,577 \$	19,003,308 \$ 5,110,443 \$ 266,366 \$ 24,380,117 \$	- \$ - \$ 20,143,507 \$ 5,634,180 \$ 279,017 \$ 26,056,704 \$	- \$ - \$ 21,352,117 \$ 5,651,953 \$ 286,798 \$ 27,290,868 \$	22,633,244 \$ 5,665,904 \$ 279,274 \$ 28,578,421 \$	- \$ - \$ 23,991,239 \$ 5,693,803 \$ 271,517 \$ 29,956,559 \$	- \$ - \$ 25,430,713 \$ 5,917,003 \$ 264,458 \$ 31,612,174 \$	26,956,556 6,363,403 274,825 33,594,783
Net Operating Annual Depreciation Annual Property Tax Expense Total OE Total E(m) Gypsum to On-site Landfill as Calculated 547,034,356	\$ 84,800 \$ 84,800 \$ 565,309 \$ 565,309	\$ 121,349 \$ \$ 6,483 \$ \$ 127,832 \$ \$ 5,226,561 \$	128,630 \$ 69,718 \$ 198,348 \$ 11,770,141 \$	\$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	19,003,308 \$ 5,110,443 \$ 266,366 \$ 24,380,117 \$	- \$ \$ 20,143,507 \$ 5,634,180 \$ 279,017 \$ 26,056,704 \$	- \$ - \$ 21,352,117 \$ 5,651,953 \$ 286,798 \$ 27,290,868 \$	\$ 22,633,244 \$ 5,665,904 \$ 279,274 \$ 28,578,421 \$ 47,430,316 \$	- \$ 23,991,239 \$ 5,693,803 \$ 271,517 \$ 29,956,559 \$ 48,060,812 \$	- \$ - \$ 25,430,713 \$ 5,917,003 \$ 264,458 \$ 31,612,174 \$	26,956,556 6,363,403 274,825 33,594,783
Net Operating Annual Depreciation Annual Property Tax Expense Total OE Total E(m) Gypsum to On-site Landfill as Calculated Total E(m) Gypsum to On-site Landfill per KU 547,034,356	\$ 84,800 \$ 84,800 \$ 565,309 \$ 565,309	\$ 121,349 \$ \$ 6,483 \$ \$ 127,832 \$ \$ 5,226,561 \$ \$ 5,226,225 \$	128,630 \$ 69,718 \$ 198,348 \$ 11,770,141 \$ 11,769,378 \$	\$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	19,003,308 \$ 5,110,443 \$ 266,366 \$ 24,380,117 \$ 44,705,579 \$ 44,705,239 \$	20,143,507 \$ 20,143,507 \$ 5,634,180 \$ 279,017 \$ 26,056,704 \$ 46,601,539 \$ 46,600,208 \$	21,352,117 \$ 5,651,953 \$ 286,798 \$ 27,290,868 \$ 46,978,148 \$ 46,976,843 \$	22,633,244 5,665,904 279,274 28,578,421 47,430,316 47,458,553 \$	\$ 23,991,239 \$ 5,693,803 \$ 271,517 \$ 29,956,559 \$ 48,060,812 \$ 48,044,547 \$	25,430,713 \$ 25,917,003 \$ 264,458 \$ 31,612,174 \$ 49,736,723 \$ 48,653,648	26,956,556 6,363,403 274,825 33,594,783
Net Operating Annual Depreciation Annual Property Tax Expense Total OE Total E(m) Gypsum to On-site Landfill as Calculated Total E(m) Gypsum to On-site Landfill per KU Calculation Check Difference	\$ 84,800 \$ 84,800 \$ 565,309 \$ 565,309	\$ 121,349 \$ \$ 6,483 \$ \$ 127,832 \$ \$ 5,226,561 \$ \$ 5,226,225 \$	128,630 \$ 69,718 \$ 198,348 \$ 11,770,141 \$ 11,769,378 \$	\$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	19,003,308 \$ 5,110,443 \$ 266,366 \$ 24,380,117 \$ 44,706,579 \$ 44,705,239 \$ 1,340 \$	20,143,507 \$ 5,634,180 \$ 279,017 \$ 26,056,704 \$ 46,601,539 \$ 46,600,208 \$ 1,331 \$	21,352,117 \$ 5,651,953 \$ 286,798 \$ 27,290,868 \$ 46,978,148 \$ 46,976,843 \$ 1,305 \$	22,633,244 \$ 26,655,904 \$ 279,274 \$ 28,578,421 \$ 47,430,316 \$ 47,458,553 \$ (28,237) \$	\$ 23,991,239 \$ 5,693,803 \$ 271,517 \$ 29,956,559 \$ 48,060,812 \$ 48,044,547 \$ 16,265 \$	25,430,713 \$ 25,917,003 \$ 264,458 \$ 31,612,174 \$ 49,736,723 \$ 48,653,648 1,083,075	26,956,556 6,363,403 274,825 33,594,783 52,503,105
Net Operating Annual Depreciation Annual Property Tax Expense Total OE Total E(m) Gypsum to On-site Landfill as Calculated Total E(m) Gypsum to On-site Landfill per KU Calculation Check Difference Site E/F Hauling cost of Ash 2.25 mile round trip	\$ 84,800 \$ 84,800 \$ 565,309 \$ 565,309	\$ 121,349 \$ \$ 6,483 \$ \$ 127,832 \$ \$ 5,226,561 \$ \$ 5,226,225 \$	128,630 \$ 69,718 \$ 198,348 \$ 11,770,141 \$ 11,769,378 \$	\$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	19,003,308 \$ 5,110,443 \$ 266,366 \$ 24,380,117 \$ 44,706,579 \$ 44,705,239 \$ 1,340 \$	20,143,507 \$ 5,634,180 \$ 279,017 \$ 26,056,704 \$ 46,601,539 \$ 46,600,208 \$ 1,331 \$ 2,992,086 \$	21,352,117 \$ 5,651,953 \$ 286,798 \$ 27,290,868 \$ 46,978,148 \$ 46,976,843 \$ 1,305 \$	22,633,244 \$ 5,665,904 \$ 279,274 \$ 28,578,421 \$ 47,430,316 \$ 47,458,553 \$ (28,237) \$	23,991,239 \$ 5,693,803 \$ 271,517 \$ 29,956,559 \$ 48,060,812 \$ 48,044,547 \$ 16,265 \$	25,430,713 \$ 25,430,713 \$ 5,917,003 \$ 264,458 \$ 31,612,174 \$ 49,736,723 \$ 48,653,648 1,083,075 3,777,440 \$	26,956,556 6,363,403 274,825 33,594,783 52,503,105
Net Operating Annual Depreciation Annual Property Tax Expense Total OE Total E(m) Gypsum to On-site Landfill as Calculated Total E(m) Gypsum to On-site Landfill per KU Calculation Check Difference Site E/F Hauling cost of Ash 2.25 mile round trip Haul Road Maintenance	\$ 84,800 \$ 84,800 \$ 565,309 \$ -	\$ 121,349 \$ \$ 6,483 \$ \$ 127,832 \$ \$ 5,226,561 \$ \$ 5,226,225 \$	128,630 \$ 69,718 \$ 198,348 \$ 11,770,141 \$ 11,769,378 \$	\$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	19,003,308 \$ 5,110,443 \$ 266,366 \$ 24,380,117 \$ 44,705,579 \$ 44,705,239 \$ 1,340 \$ 2,822,723 \$ 53,529 \$	2,992,086 \$ 5,6741 \$	21,352,117 \$ 5,651,953 \$ 286,798 \$ 27,290,868 \$ 46,978,148 \$ 46,976,843 \$ 1,305 \$ 3,171,612 \$ 60,145 \$	\$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	\$ 23,991,239 \$ 5,693,803 \$ 271,517 \$ 29,956,559 \$ 48,060,812 \$ 48,044,547 \$ 16,265 \$ 3,563,623 \$ 67,579 \$	- \$ \$ 25,430,713 \$ 5,917,003 \$ 264,458 \$ 31,612,174 \$ \$ 49,736,723 \$ 48,653,648 \$ 1,083,075 \$ 3,777,440 \$ 71,634 \$	26,956,556 6,363,403 274,825 33,594,783 52,503,105 4,004,087 75,932

					Attac	hment to LG	&E-KU Supp	lemental Res	•	Ū	es Question No. ir, Voyles, and S
Revenue Requirments Summary Gypsum Disposal at Sterling Materials		2020 2021	2022	2023	2024	2025	2026 Start Phase II	2027	2028	2029	Page 1
Revenue Requirement						\$	500,000 \$	1,000,000 \$	8,000,000 \$	16,000,000 \$	11,000,000
Eligible Plant	\$ 239,078	976 \$ 242,578,976	242,578,976 \$	242,578,976 \$	262,328,976 \$	302,328,976 \$	342,328,976 \$	360,000,000 \$	360,000,000 \$	360,000,000 \$	360,000,000
Less Gypsum Plant Requirements/Phase Delays	\$ (89,610)	000) \$ (93,110,000) :	(93,110,000) \$	(93,110,000) \$	(112,860,000) \$	(152,860,000) \$	(192,360,000) \$	(209,031,024) \$	(201,031,024) \$	(185,031,024) \$	(174,031,024)
Revised Eligible Plant	\$ 149,468	976 \$ 149,468,976 :	149,468,976 \$	149,468,976 \$	149,468,976 \$	149,468,976 \$	149,968,976 \$	150,968,976 \$	158,968,976 \$	174,968,976 \$	185,968,976
Less Accumulated Depreciation	\$ (32,863,	931) \$ (37,034,115) \$	(41,204,299) \$	(45,374,483) \$	(49,544,667) \$	(53,714,851) \$	(57,898,986) \$	(62,111,020) \$	(66,546,254) \$	(71,427,888) \$	(76,616,422)
Less Deferred Tax Balance	\$ (12,869)		(16,135,603) \$	(17,768,648) \$	(19,401,692) \$	(21,034,736) \$	(22,673,243) \$	(24,322,675) \$	(26,059,513) \$	(27,971,161) \$	(30,002,991)
Environmental Compliance Rate Base	\$ 103,735,			86,325,845 \$	80,522,617 \$	74,719,389 \$	69,396,748 \$	64,535,281 \$	66,363,209 \$	75,569,927 \$	79,349,563
Rate of Return		97% 10.97%	10.97%	10.97%	10.97%	10.97%	10.97%	10.97%	10.97%	10.97%	10.97%
Assumed Tons (1.155) 1,000,000	\$ 11,379, \$ 27.		10,106,559 \$	9,469,945 \$	8,833,331 \$	8,196,717 \$	7,612,823 \$	7,079,520 \$	7,280,044 \$	8,290,021 \$	8,704,647
86.7500% Cubic yards 867,500 Operating Expenses	\$ 28,601,	051 \$ 661,940 000 \$ 30,979,000 \$	22 927 740 6	34,808,004 \$	26.006.405. 6	20 110 274 . 6	41,456,890 \$	\$ 43,944,304 \$	(1,912,962) 44,668,000 \$	47,348,080 \$	50,188,965
less Gypsum to On-site Landfill	\$ (14,389,				36,896,485 \$ (18,165,819) \$	39,110,274 \$ (19,255,768) \$	(20,411,115) \$	(21,635,781) \$	(22,933,928) \$	(24,309,964) \$	(25,768,562)
Gypsum to Sterling \$ 9.00	\$ 13,532,			16.117.629 \$	17,084,687 \$	18,109,768 \$	19,196,354 \$	20,348,136 \$	21,569,024 \$	22,863,165 \$	24,234,955
Net Operating	\$ 27,744,			33,788,068 \$	35,815,352 \$	37,964,274 \$	40,242,130 \$	42,656,658 \$	43,303,095 \$	45,901,281 \$	48,655,358
Annual Depreciation	\$ 4,170,			4,170,184 \$	4,170,184 \$	4,170,184 \$	4,184,134 \$	4,212,034 \$	4,435,234 \$	4,881,634 \$	5,188,534
Annual Property Tax Expense	\$ 295,			314,348 \$	314,348 \$	339,942 \$	391,776 \$	443,610 \$	466,510 \$	466,510 \$	466,510
Total OE	\$ 32,210,			38,272,601 \$	40,299,885 \$	42,474,399 \$	44,818,040 \$	47,312,302 \$	48,204,839 \$	51,249,425 \$	54,310,402
					· · · · · · · · · · · · · · · · · · ·				· · · · · ·	•	
Total E(m) Gypsum to Sterling \$ 437,628,68				47,742,546 \$	49,133,216 \$	50,671,116 \$	52,430,863 \$	54,391,823 \$	55,484,883 \$	59,539,446 \$	63,015,049
Total E(m) - Project 30 (See below) \$ 547,034,35	6 \$ 54,663,	505 \$ 56,504,274 \$	57,334,363 \$	58,271,442 \$	61,960,218 \$	68,415,929 \$	74,860,342 \$	78,297,820 \$	77,511,114 \$	78,657,892 \$	79,965,474
Difference PVRR 7.81% \$ (109,405,67				(10,528,896) \$	(12,827,002) \$	(17,744,813) \$	(22,429,478) \$	(23,905,998) \$	(22,026,231) \$	(19,118,446) \$	(16,950,426)
Date	12/31/2	020 12/31/2021	12/31/2022	12/31/2023	12/31/2024	12/31/2025	12/31/2026	12/31/2027	12/31/2028	12/31/2029	12/31/2030
2009 Amended Plan Project 30 Ghent Landfill Phase I See Exhibit B	2	020 2021	2022	2023	2024 Start Phase III	2025	2026	2027	2028	2029	2030
Revenue Requirement	\$ 11,000.0	00 \$ 3,500,000		ς`	19,750,000 \$	40,000,000 \$	40,000,000 \$	17,671,024			
Eligible Plant	\$ 239,078,9		242,578,976 \$	242,578,976 \$	262,328,976 \$	302,328,976 \$	342,328,976 \$	360,000,000 \$	360,000,000 \$	360,000,000 \$	360,000,000
Less Gypsum Plant Requirements/Phase Delays	\$	-\$	- \$	- \$	- \$	- \$	- \$	-·\$	- \$	- \$	
Revised Eligible Plant	\$ 239,078,9	76 \$ 242,578,976 \$	242,578,976 \$	242,578,976 \$	262,328,976 \$	302,328,976 \$	342,328,976 \$	360,000,000 \$	360,000,000 \$	360,000,000 \$	360,000,000
Less Accumulated Depreciation	\$ (46,706,9	92) \$ (53,474,945) \$	(60,242,897) \$	(67,010,850) \$	(74,329,828) \$	(82,764,806) \$	(92,315,784) \$	(102,359,783) \$	(112,403,782) \$	(122,447,782) \$	(132,491,781)
Less Deferred Tax Balance	\$ (18,290,4	58) \$ (20,940,788) \$	(23,591,119) \$	(26,241,449) \$	(29,107,561) \$	(32,410,698) \$	(36,150,861) \$	(40,084,091) \$	(44,017,321) \$	(47,950,551) \$	(51,883,781)
Environmental Compliance Rate Base	\$ 174,081,5			149,326,677 \$	158,891,587 \$	187,153,472 \$	213,862,331 \$	217,556,126 \$	203,578,896 \$	189,601,667 \$	175,624,438
Rate of Return	10.9		10.97%	10.97%	10.97%	10.97%	10.97%	10.97%	10.97%	10.97%	10.97%
	\$ 19,096,7		17,414,322 \$	16,381,136 \$	17,430,407 \$	20,530,736 \$	23,460,698 \$	23,865,907 \$	22,332,605 \$	20,799,303 \$	19,266,001
Difference \$ -	\$ 27,0		22 227 740 4	24 202 204 4	36,896,485 \$	20 440 274 4	44 455 000 4	\$ 43.944.304 \$	(1,912,962)	47.240.000 4	50,188,965
Operating Expenses less Gypsum to On-site Landfill	\$ 28,601,0	00 \$ 30,979,000 \$	32,837,740 \$	34,808,004 \$							
1633 GYDSUN TO OUTSITE LANGIN	ė	٠ ٠				39,110,274 \$	41,456,890 \$, , ,	44,668,000 \$	47,348,080 \$	30,100,303
**	\$ -	\$ - \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	-
Gypsum to Sterling	\$ -	\$ - \$	- \$ - \$	- \$ - \$	- \$ - \$	- \$ - \$	- \$ - \$	- \$ - \$	- \$ - \$	- \$ - \$	- -
Gypsum to Sterling Net Operating	\$ 28,601,0	\$ - \$ 00 \$ 30,979,000 \$	- \$ - \$ 32,837,740 \$	- \$ - \$ 34,808,004 \$	- \$ - \$ 36,896,485 \$	- \$ - \$ 39,110,274 \$	- \$ - \$ 41,456,890 \$	- \$ - \$ 43,944,304 \$	- \$ - \$ 44,668,000 \$	- \$ - \$ 47,348,080 \$	50,188,965
Gypsum to Sterling Net Operating Annual Depreciation	\$ 28,601,0	\$ - \$ 00 \$ 30,979,000 \$ 03 \$ 6,767,953 \$	- \$ - \$	- \$ - \$	- \$ - \$	- \$ - \$	- \$ - \$	- \$ - \$ 43,944,304 \$	- \$ - \$ 44,668,000 \$	- \$ - \$	- -
Gypsum to Sterling Net Operating Annual Depreciation Annual Property Tax Expense	\$ 28,601,0 \$ 6,670,3	\$ - \$ 00 \$ 30,979,000 \$ 03 \$ 6,767,953 \$ 58 \$ 309,813 \$	- \$ \$ 32,837,740 \$ 6,767,953 \$	- \$ - \$ 34,808,004 \$ 6,767,953 \$	- \$ - \$ 36,896,485 \$ 7,318,978 \$	- \$ - \$ 39,110,274 \$ 8,434,978 \$	- \$ - \$ 41,456,890 \$ 9,550,978 \$	- \$ - \$ 43,944,304 \$ 10,043,999 \$	- \$ - \$ 44,668,000 \$ 10,043,999 \$	- \$ - \$ 47,348,080 \$ 10,043,999 \$	50,188,965 10,043,999
Gypsum to Sterling Net Operating Annual Depreciation Annual Property Tax Expense Total OE Total OE Total E(m) Gypsum to On-site Landfill as Calculated 547,034,355	\$ 28,601,0 \$ 6,670,3 \$ 295,5 \$ 35,566,8	\$ - \$ 50 \$ 30,979,000 \$ 03 \$ 6,767,953 \$ 58 \$ 309,813 \$ 51 \$ 38,056,766 \$	- \$ - \$ 32,837,740 \$ 6,767,953 \$ 314,348 \$	- \$ - \$ 34,808,004 \$ 6,767,953 \$ 314,348 \$	- \$ - \$ 36,896,485 \$ 7,318,978 \$ 314,348 \$	- \$ - \$ 39,110,274 \$ 8,434,978 \$ 339,942 \$	- \$ - \$ 41,456,890 \$ 9,550,978 \$ 391,776 \$	- \$ - \$ 43,944,304 \$ 10,043,999 \$ 443,610 \$	- \$ - \$ 44,668,000 \$ 10,043,999 \$ 466,510 \$	- \$ - \$ 47,348,080 \$ 10,043,999 \$ 466,510 \$	50,188,965 10,043,999 466,510
Gypsum to Sterling Net Operating Annual Depreciation Annual Property Tax Expense Total OE Total E(m) Gypsum to On-site Landfill as Calculated 547,034,351 Total E(m) Gypsum to On-site Landfill per KU	\$ 28,601,0 \$ 6,670,3 \$ 295,5 \$ 35,566,8	\$ - \$ 50 \$ 30,979,000 \$ 03 \$ 6,767,953 \$ 58 \$ 309,813 \$ 51 \$ 38,056,766 \$	- \$ - \$ 32,837,740 \$ 6,767,953 \$ 314,348 \$ 39,920,041 \$	- \$ 34,808,004 \$ 6,767,953 \$ 314,348 \$ 41,890,306 \$	36,896,485 \$ 7,318,978 \$ 314,348 \$ 44,529,811 \$	- \$ - \$ 39,110,274 \$ 8,434,978 \$ 339,942 \$ 47,885,193 \$	- \$ - \$ 41,456,890 \$ 9,550,978 \$ 391,776 \$ 51,399,644 \$	- \$ - \$ 43,944,304 \$ 10,043,999 \$ 443,610 \$ 54,431,913 \$	44,668,000 \$ 10,043,999 \$ 466,510 \$ 55,178,509 \$	- \$ - \$ 47,348,080 \$ 10,043,999 \$ 466,510 \$ 57,858,589 \$	50,188,965 10,043,999 466,510 60,699,474
Gypsum to Sterling Net Operating Annual Depreciation Annual Property Tax Expense Total OE Total E(m) Gypsum to On-site Landfill as Calculated Total E(m) Gypsum to On-site Landfill per KU Calculation Check Difference	\$ 28,601,6 \$ 6,670,3 \$ 295,5 \$ 35,566,8 \$ 54,663,6	\$. \$. \$. \$. \$. \$. \$. \$. \$. \$.	\$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	34,808,004 \$ 6,767,953 \$ 314,348 \$ 41,890,306 \$ 58,271,442 \$	36,896,485 \$ 7,318,978 \$ 314,348 \$ 44,529,811 \$ 61,960,218 \$	39,110,274 \$ 8,434,978 \$ 339,942 \$ 47,885,193 \$	41,456,890 \$ 9,550,978 \$ 391,776 \$ 51,399,644 \$ 74,860,342 \$	- \$ 43,944,304 \$ 10,043,999 \$ 443,610 \$ 54,431,913 \$ 78,297,820 \$	44,668,000 \$ 10,043,999 \$ 466,510 \$ 55,178,509 \$ 77,511,114 \$	47,348,080 \$ 10,043,999 \$ 466,510 \$ 57,858,589 \$ 78,657,892 \$	50,188,965 10,043,999 466,510 60,699,474 79,965,474
Gypsum to Sterling Net Operating Annual Depreciation Annual Property Tax Expense Total OE Total E(m) Gypsum to On-site Landfill as Calculated Total E(m) Gypsum to On-site Landfill per KU Calculation Check Difference Site E/F Hauling cost of Ash 2.25 mile round trip	\$ 28,601,6 \$ 6,670,3 \$ 295,5 \$ 35,566,8 \$ 54,663,6	\$ - \$ \$ 0.00 \$ 30,979,000 \$ \$ 30,979,000 \$ \$ 30,979,000 \$ \$ 30,979,000 \$ \$ 30,979,000 \$ \$ 30,979,000 \$ \$ \$ 30,979,000 \$ \$ \$ 30,979,000 \$ \$ \$ 30,979,000 \$ \$ \$ 30,979,000 \$ \$ \$ 30,979,000 \$ \$ \$ 30,979,000 \$ \$ \$ 30,979,000 \$ \$ \$ 30,979,000 \$ \$ \$ \$ 30,979,000 \$ \$ \$ \$ 30,979,000 \$ \$ \$ \$ \$ 30,979,000 \$ \$ \$ \$ \$ 30,979,000 \$ \$ \$ \$ \$ 30,979,000 \$ \$ \$ \$ \$ 30,979,000 \$ \$ \$ \$ \$ \$ 30,979,000 \$ \$ \$ \$ \$ \$ \$ 56,504,274 \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	\$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	34,808,004 \$ 6,767,953 \$ 314,348 \$ 41,890,306 \$ 58,271,442 \$ 5,055,067 \$	36,896,485 \$ 7,318,978 \$ 314,348 \$ 44,529,811 \$ 61,960,218 \$ 5,358,371 \$	- \$ 39,110,274 \$ 8,434,978 \$ 339,942 \$ 47,885,193 \$ 68,415,929 \$	- \$ \$ 41,456,890 \$ 9,550,978 \$ 391,776 \$ 51,399,644 \$ 74,860,342 \$ 6,020,666 \$	- \$ 43,944,304 \$ 10,043,999 \$ 443,610 \$ 54,431,913 \$ 78,297,820 \$	44,668,000 \$ 10,043,999 \$ 466,510 \$ 55,178,509 \$ 77,511,114 \$	47,348,080 \$ 10,043,999 \$ 466,510 \$ 57,858,589 \$ 78,657,892 \$	50,188,965 10,043,999 466,510 60,699,474 79,965,474
Gypsum to Sterling Net Operating Annual Depreciation Annual Property Tax Expense Total OE Total E(m) Gypsum to On-site Landfill as Calculated Total E(m) Gypsum to On-site Landfill per KU Calculation Check Difference	\$ 28,601,6 \$ 6,670,3 \$ 295,5 \$ 35,566,8 \$ 54,663,6	\$ 30,979,000 \$ 30,	\$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	34,808,004 \$ 6,767,953 \$ 314,348 \$ 41,890,306 \$ 58,271,442 \$	36,896,485 \$ 7,318,978 \$ 314,348 \$ 44,529,811 \$ 61,960,218 \$	39,110,274 \$ 8,434,978 \$ 339,942 \$ 47,885,193 \$	41,456,890 \$ 9,550,978 \$ 391,776 \$ 51,399,644 \$ 74,860,342 \$	- \$ 43,944,304 \$ 10,043,999 \$ 443,610 \$ 54,431,913 \$ 78,297,820 \$	44,668,000 \$ 10,043,999 \$ 466,510 \$ 55,178,509 \$ 77,511,114 \$	47,348,080 \$ 10,043,999 \$ 466,510 \$ 57,858,589 \$ 78,657,892 \$	50,188,965 10,043,999 466,510 60,699,474 79,965,474
Gypsum to Sterling Net Operating Annual Depreciation Annual Property Tax Expense Total OE Total E(m) Gypsum to On-site Landfill as Calculated Total E(m) Gypsum to On-site Landfill per KU Calculation Check Difference Site E/F Hauling cost of Ash 2.25 mile round trip Haul Road Maintenance	\$ 28,601,0 \$ 6,670,3 \$ 295,5 \$ 35,566,8 6 \$ 54,663,6 \$ 4,244,3 \$ 80,4	\$ - \$ \$ 0,979,000 \$ 0,079,000 \$ 0,767,953 \$ 58 \$ 309,813 \$ 51 \$ 38,056,766 \$ 50 \$ 56,504,274 \$ 51 \$ 56,504,274 \$ 56,504,274 \$ 51 \$ 56,504,274 \$ 56,504,274 \$ 51 \$ 56,504,274 \$ 51 \$ 56,504,274 \$ 51 \$ 56,504,274 \$ 51 \$ 56,504,274 \$ 51 \$ 56,504,274 \$ 51 \$ 56,504,274 \$ 51 \$ 56,504,274 \$ 51 \$ 56,504,274 \$ 51 \$ 56,504,274 \$ 56,504	\$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	5,055,067 \$ 95,862 \$	36,896,485 \$ 7,318,978 \$ 314,348 \$ 44,529,811 \$ 61,960,218 \$ 5,358,371 \$ 101,614 \$	- \$ 39,110,274 \$ 8,434,978 \$ 339,942 \$ 47,885,193 \$ 68,415,929 \$ 5,679,873 \$ 107,711 \$	- \$ \$ 41,456,890 \$ 9,550,978 \$ 391,776 \$ 51,399,644 \$ 74,860,342 \$ 6,020,666 \$ 114,174 \$	- \$ 43,944,304 \$ 10,043,999 \$ 443,610 \$ 54,431,913 \$ 78,297,820 \$ 6,381,906 \$ 121,024 \$	44,668,000 \$ 10,043,999 \$ 466,510 \$ 55,178,509 \$ 77,511,114 \$ 6,764,820 \$ 128,285 \$	7,170,709 \$ 135,982 \$	50,188,965 10,043,999 466,510 60,699,474 79,965,474

Attachment to LG&E-KU Supplemental Response to Sterling Ventures Question No. 1-17(d)
Witnesses: Sinclair, Voyles, and Straight
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				Annual Rev	enue Requirements	Ghent Landfill - Kt	J Project 30			
			Capital	· months of the control of the contr		imate at the second	A&O	1		Total
	Phase 1	Phase 2	Phase 3	Final Cap	Total	Non-Power	Power	Beneficial Reuse	Total O&M	
12/31/2009	480,509	- [-		480,509	11017, 01101	84,800	nease	84,800	565,30
12/31/2010	5,098,729	-			5,098,729		127,832		127,832	5,226,50
12/31/2011	11,571,793	-	-		11,571,793		198,348		198,348	11,770,1
12/31/2012	19,480,236	-	-		19,480,236		294,577		294,577	19,774,8
12/31/2013	20,326,462	-	-		20,326,462		24,380,117		24,380,117	44,706,5
12/31/2014	20,544,834	-	-		20,544,834		26,056,704		26,056,704	46,601,5
12/31/2015	19,687,280	-	-		19,687,280		27,290,868		27,290,868	46,978,1
12/31/2016	18,799,210	52,684	-		18,851,894		28,578,421		28,578,421	47,430,3
12/31/2017	17,948,314	155,939	-		18,104,253		29,956,559		29,956,559	48,060,8
12/31/2018	17,131,380	993,170	-		18,124,550		31,612,174		31,612,174	49,736,7
12/31/2019	16,268,561	2,639,761	-		18,908,322		33,594,783		33,594,783	52,503,1
12/31/2020	15,405,743	3,691,001	-		19,096,743		35,566,861		35,566,861	54,663,6
12/31/2021	14,542,924	3,904,584	-		18,447,508		38,056,766		38,056,766	56,504,2
12/31/2022	13,680,105	3,734,217	-		17,414,322		39,920,041		39,920,041	57,334,3
12/31/2023	12,817,286	3,563,850	-		16,381,136		41,890,306		41,890,306	58,271,4
12/31/2024	11,954,467	3,393,483	2,082,456		17,430,407		44,529,811		44,529,811	61,960,2
12/31/2025	11,091,649	3,223,116	6,215,971		20,530,736	ļ	47,885,193		47,885,193	68,415,9
12/31/2026	10,228,830	3,052,749	10,179,118		23,460,698	I	51,399,644		51,399,644	74,860,3
12/31/2027	9,366,011	2,882,383	11,617,513		23,865,907		54,431,913		54,431,913	78,297,8
12/31/2028	8,503,192	2,712,016	11,117,397		22,332,605		55,178,509		55,178,509	77,511,1
12/31/2029	7,640,374	2,541,649	10,617,281		20,799,303		57,858,589		57,858,589	78,657,8
12/31/2030	6,777,555	2,371,282	10,117,164		19,266,001		60,699,474	•	60,699,474	79,965,4
12/31/2031	5,914,736	2,200,915	9,617,048		17,732,699		63,710,812		63,710,812	81,443,5
12/31/2032	5,051,917	2,030,548	9,116,931		16,199,397		66,902,830		66,902,830	83,102,2
12/31/2033	4,189,098	1,860,181	8,616,815		14,666,095	-	70,286,369		70,286,369	84,952,4
12/31/2034	3,326,280	1,689,814	8,116,699		13,132,793	1	73,872,921		73,872,921	87,005,7
12/31/2035	2,463,461	1,519,447	7,616,582	İ	11,599,490		77,674,665		77,674,665	89,274,1
12/31/2036	1,600,642	1,349,080	7,116,466		10,066,188		81,704,515		81,704,515	91,770,7
12/31/2037	737,823	1,178,714	6,616,349		8,532,886		85,976,155		85,976,155	94,509,0
2009 PVRR	153,383,226	14,945,173	24,389,184		192,717,582		354,316,774		354,316,774	547,034,3
c Yards	9,542,500	6,072,500	9,542,500	-	25,157,500	-	25,157,500		25,157,500	25,157,5
-	•				<u> </u>				\$/CY (PVRR)	\$ 21

-			Annual Revenue F	lequirements - Gh	ent Landfill - KU Pro 	ject 30 with Benef	icial Reuse -Sterling \	entures Mine		
-		.,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	Capital			,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	. O&N	Л		Total
	Phase 1	Phase 2	Phase 3	Final Cap	Total	`Non-Power	Power	Beneficial Reuse	Total O&M	
12/31/2009	480,509	-	- [480,509		84,800		84,800	56
12/31/2010	3,553,056	-	-		3,553,056		127,832		127,832	3,68
12/31/2011	7,177,211	-	-		7,177,211		198,348	_	198,348	7,37
12/31/2012	13,654,069	-	-		13,654,069		294,577	_	294,577	13,94
12/31/2013	14,678,389	-	-		14,678,389		24,380,117	(489,556)		38,56
12/31/2014	15,152,993	- [15,152,993		26,056,704	(495,467)		40,71
12/31/2015	14,539,006	- [- 1	J	14,539,006		27,290,868	(436,289)		41,39
12/31/2016	13,883,815	-	-		13,883,815		28,578,421	(387,511)		42,07
12/31/2017	13,255,915	-	-		13,255,915		29,956,559	(348,918)		42,86
12/31/2018	12,653,016	- [-		12,653,016		31,612,174	(501,636)	31,110,538	43,76
12/31/2019	12,016,402	-	-		12,016,402		33,594,783	(873,325)	32,721,458	44,73
12/31/2020	11,379,788	-	- 1]	11,379,788	i	35,566,861	(1,101,031)		45,84
12/31/2021	10,743,173	-	-	i	10,743,173		38,056,766	(1,114,736)		47,68
12/31/2022	10,106,559	-	-		10,106,559		39,920,041	(1,025,754)		49,00
12/31/2023	9,469,945	-	-	İ	9,469,945		41,890,306	(931,433)		50,42
12/31/2024	8,833,331	-	-		8,833,331		44,529,811	(1,382,478)		51,98
12/31/2025	8,196,717	-	-	-	8,196,717		47,885,193	(2,392,499)		53,68
12/31/2026	7,560,103	52,720	-		7,612,823		51,399,644	(3,382,211)		55,63
12/31/2027	6,923,489	156,032	-		7,079,520		54,431,913	(3,728,255)		57,78
12/31/2028	6,286,875	993,170		!	7,280,044		55,178,509	(3,378,832)		59,07
12/31/2029	5,650,260	2,639,761	-	[8,290,021		57,858,589	(2,798,637)		63,34
12/31/2030	5,013,646	3,691,001	-	-	8,704,647		60,699,474	(2,349,913)		67,05
12/31/2031	4,377,032	3,904,584			8,281,616		63,710,812	(2,101,930)		69,89
12/31/2032	3,740,418	3,734,217			7,474,635	Ī	66,902,830	(1,942,577)		72,43
12/31/2033	3,103,804	3,563,850	-	Į.	6,667,654		70,286,369	(1,773,662)		75,186
12/31/2034	2,467,190	3,393,483	-		5,860,673		73,872,921	(1,594,613)		78,13
12/31/2035	1,830,576	3,223,116	-		5,053,692		77,674,665	(1,404,821)		81,32
12/31/2036	1,193,961	3,052,749	-	1	4,246,711		81,704,515	(1,203,641)	80,500,873	84,74
12/31/2037	557,347	2,882,383	-		3,439,730	1	85,976,155	(990,391)	84,985,764	88,42
2009 PVRR	111,212,472	5,355,077			116,567,550		354,316,774	(10,448,976)	343,867,798	460,43
: Yards	17,350,000	7,807,500	1		25,157,500		25,157,500		25,157,500	25,157
<u> </u>			I				20,207,000			\$:

CASE	Option 30	ption 30 with enefical Reuse
PVRR		-
Capital	\$ 192,717,582	\$ 116,567,550
O&M	354,316,774	343,867,798
Total	\$ 547,034,356	\$ 460,435,348
Delta to Least Cost	\$ 86,599,008	Least Cost
Unit Cost (2009 PVRR \$/CY)	\$ 21.74	\$ 18.30

Attachment to LG&E-KU Supplemental Response to Sterling Ventures Question No. 1-17(d)
Witnesses: Sinclair, Voyles, and Straight
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Ghent Station: Analysis of Off-Site Gypsum Storage Proposal



PPL companies

Generation Planning & Analysis February 24, 2012

February 24, 2012

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1 Background

In the June 2009 ECR filing, several alternatives were considered for storing coal combustion residuals (CCR) at the Ghent Station over the next 25 years. The least-cost alternative included (a) the construction of an on-site landfill to store ash and gypsum and (b) a short-term agreement with Trans Ash to move CCR offsite until new landfill capacity became available in 2013. After the ECR filing, the EPA issued new CCR rules and Trans Ash's storage facility was no longer considered to be an approved structural fill. In 2010, after updating its forecast of CCR production, the Company learned that the short-term need for off-site ash storage had been eliminated and that the short-term need for offsite gypsum storage had been reduced to 0.1 million cubic yards (MCY). Sterling Ventures (Sterling) was identified as a potential alternative for storing the gypsum but no agreement was ultimately reached. Based on the Company's most recent CCR production forecast, the short-term need for offsite gypsum storage no longer exists. In late 2011, Sterling Ventures submitted a new proposal for storing gypsum.

2 Sterling Proposal

Sterling has proposed to store all gypsum from the Ghent Station (net of sales to CertainTeed) in its offsite storage facility for \$10.95/ton. Per the proposal, Sterling will excavate, load, and haul gypsum from the existing gypsum stack at the Ghent station. In doing this, Sterling claims that the Company can defer the need for subsequent landfill phases and avoid approximately \$53 million in capital costs for a dry gypsum handling system, gypsum fines project, and gypsum dewatering facility. In addition, by eliminating the need to store gypsum altogether, Sterling claims that Company can realize further capital savings by reverting to a CCR storage alternative from the 2009 ECR filing that included a smaller landfill located closer to the Ghent station. Finally, in addition to its proposal for storing gypsum, Sterling has proposed to backhaul high calcium limestone to the Ghent station for \$6.50/ton. See Attachment 1 for the Sterling Ventures proposal.

3 Analysis of Sterling Proposal

The Company considered the Sterling proposal as an alternative to its current plan. Due to the costs and risks associated with operating a gypsum stack, the Company plans to retire the gypsum stack when the new landfill is in service. Therefore, contrary to Sterling's claims, Sterling will not be able to take gypsum from the existing gypsum stack and the Company will not be able to avoid the capital costs for the dry gypsum handling system, gypsum fines project, and gypsum dewatering facility. In addition, selecting a different landfill alternative at the Ghent station is not a viable option because this would require new environmental permits and delay the project by two years.

Table 1 contains a summary of the assumptions used in this analysis. The Sterling proposal defers the need for Phase II of the currently proposed landfill and eliminates the need for Phase III of the landfill altogether. Because gypsum comprises 60% of all CCR, Phases I and II of the landfill with the Sterling proposal have seven more years of landfill capacity than all phases of the landfill without the Sterling proposal. With the Sterling proposal, gypsum is dewatered at the station and transported by Sterling to

Page 20 of 43

an offsite storage facility for \$10.95/ton. With the Company's current plan, gypsum with the same moisture content is delivered to the landfill for \$4.43/ton.

Table 1 – Summary of Assumptions (\$2013)

		Landfill w/ Sterling
	Landfill Only	Ventures Proposal
In-Service Year/Capacity of Phase I	2013 / 14.3 MCY	2013 / 14.3 MCY
In-Service Year/Capacity of Phase II	2022 / 14.5 MCY	2028 /14.5 MCY
In-Service Year/Capacity of Phase III	2031 / 23.0 MCY	N/A
Landfill End of Service Year	2046	2053
Dewatering Cost (all CCR)	\$112,200 per month	\$112,200 per month
Sterling Transport and Storage Cost	N/A	\$10.95/wet ton
Cost to Place CCR in Landfill	\$4.43/wet ton	\$4.43/wet ton

The results of this analysis are summarized in Table 2. The levelized cost per cubic yard of CCR placed (either in the landfill or transported to an offsite storage facility) is lower in the Company's current plan; the savings in the Sterling proposal associated with deferring or eliminating the need for landfill phases are more than offset by the higher variable costs of transporting gypsum to an offsite storage facility.

Table 2 - Analysis Results

	Landfill Only	Landfill w/ Sterling Ventures Proposal				
Net Present Value Revenue Requirements (NPVRR, \$Millions)						
Capital	348	297				
0&M	169	313				
Total	517	610				
Levelized NPVRR/CY (Dollars)	\$24.51	\$27.63				

Sterling's cost to transport and store gypsum is \$10.95/wet ton. This cost must decrease to \$7.50/wet ton to break even with the Company's current proposal.

Concerning the option to purchase limestone from Sterling, Ghent's current cost of limestone is higher than \$6.50/ton. If the savings in limestone costs are credited to the Sterling proposal, the Sterling proposal compares more favorably to the Company's current proposal, but the Company's current proposal is still least-cost. With the limestone option, Sterling's 'break-even' cost increases from \$7.50/wet ton to \$8.75/wet ton.



ENERGY AND ENVIRONMENT CABINET

Steven L. Beshear Governor

Department for Environmental Protection Division of Waste Management 200 Fair Oaks Lane, Second Floor Frankfort, Kentucky 40601 www.kentucky.gov Leonard K. Peters Secretary

November 19, 2010

John W. Walters, Vice President Sterling Ventures, LLC 376 South Broadway Lexington, KY 40508

Certified Mail No. 7010 0780 0001 1440 8766

RE: Registered Permit-By-Rule for Beneficial Reuse

Sterling Mine Agency Interest No. 1461 Application No. ARP20100001 Gallatin County

Dear Mr. Walters:

The Division of Waste Management has reviewed the above referenced application and found it to be complete. The application received on July 15, 2010 is accepted with the conditions listed on the enclosed permit and as described in the approved plans and application.

Be advised, if you consider yourself aggrieved by the issuance of this permit, you have a right, pursuant to KRS 224.10-420(2) and 401 KAR 47:130 Section 2(3), to file with the cabinet a petition demanding a hearing. This right to demand a hearing shall be limited to a period of thirty (30) days after receipt of this permit. Be advised this acceptance does not supersede any local or county land use ordinances. If you need clarification or additional information, please contact Bob Bickner at (502) 564-6716 extension 4674.

Sincerely,

Ronald D. Gruzesky, P.E.

Manager, Solid Waste Branch

R.D. Hzerly

Enclosure RDG/RAB/rcg

c: Reading file





Kentucky Energy and Environment Cabinet Department for Environmental Protection Division of Waste Management

PERMIT

Facility: Sterling Ventures LLC

100 Sierra Dr Verona, KY 41092

Permittee: Sterling Materials

376 South Broadway Lexington, KY 40508

Agency Interest: Sterling Ventures LLC

100 Sierra Dr Verona, KY 41092

The Division has issued the permit under the provisions of KRS Chapter 224 and regulations promulgated pursuant thereto. This permitted activity or activities are subject to all conditions and operating limitations contained herein. Issuance of this permit does not relieve the permittee from the responsibility of obtaining any other permits, licenses or approvals required by this Division or other state and local agencies.

No deviation from the plans and specifications submitted with your application or any condition specified herein is allowed, unless authorized in writing from the Division. Violation of the terms and conditions specified herein may render this permit null and void. All rights of inspection by representatives of the Division are reserved. Conformance with all applicable Waste Management Regulations is the responsibility of the permittee.

Agency Interest ID #: 1461

Solid Waste Permit #: SW00800023

County: Gallatin

Permitted Activities:

Subject Item	Activity	Туре	Status
ACTV001	Beneficial Reuse-Special Waste-RPBR/00800023	Registered Permit by Rule	Active

ARP20100001 - Approved Application

Issuance Date: 11/19/2010

Page 1 of 3

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Permit Number: SW00800023 Agency Interest ID: 1461

PERMIT

First Operational Permit Effective Date: 11/19/2010

Permit Effective Date: 11/19/2010

Permit Expiration Date: Life of facility

Permit issued: 11/19/2010

Ronald D. Gruzesky, P.E.

R.D. Herly

Manager, Solid Waste Branch

Permit Conditions:

Subject Items

ACTV0001 - Beneficial Reuse-Special Waste-RPBR

Standard Requirements:

- 1. General: The owner or operator of a special waste facility shall comply with KRS Chapter 224 and 401 KAR Chapters 30, 40 and 45 for the operation of special waste facilities. [KRS 224.50-760]
- 2. General: For operation of the special waste beneficial reuse that is not otherwise specified in 401 KAR 45:060, the owner or operator shall comply with KRS Chapter 224.50-760, 401 KAR 45:070 and the approved permit application(s). [401 KAR 45:070]

Variances, Alternate Specifications and Special Conditions:

- 1. Operation: The owner or operator is approved to beneficially reuse flue gas desulfurization gypsum produced by the KU Ghent Power Station in mined out sections of the Sterling Mine on the first level, in the Tyrone Limestone. [401 KAR 45:070 Section 3]
- 2. Operation: The owner or operator shall submit a revised registration prior to beneficially reusing sources or types of wastes other than FGD sludge from the KU Ghent power station, beneficially reusing FGD gypsum in areas other than the first level of the mine, changing the method of processing waste, adding new processes, changing the operator, or changing ownership. [401 KAR 45:070 Section 4]

ARP20100001 - Approved Application

Issuance Date: 11/19/2010

Page 2 of 3

Page 24 of 4

Permit Number: SW00800023 Agency Interest ID: 1461

PERMIT

- 3. Operation: The owner or operator shall comply with the Environmental Performance Standards of 401 KAR 30:031. [401 KAR 30:031]
- 4. Operation: The owner or operator is approved to beneficially reuse up to 800,000 tons per year of FGD gypsum. [401 KAR 45:070 Section 3]
- 5. Operation: The owner or operator shall ensure that no water, except that necessary for dust suppression, shall enter the beneficial reuse area. [401 KAR 45:140 Section 2]
- 6. Operation: The owner or operator shall ensure that the FGD gypsum is stored only in areas with no standing water. [401 KAR 45:140 Section 2]

County Sources - The owner or operator may accept waste as authorized by the cabinet pursuant to KRS 224 and/or 401 KAR Chapter 47 from the following counties:

Kentucky: Carroll

Approved Applications - The owner or operator shall comply with applicable statutes and regulations and the following approved applications:

1. 11-19-2010 - ARP20100001 - Registered Permit-by-Rule Beneficial Reuse

ARP20100001 - Approved Application

Issuance Date: 11/19/2010





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ENVIRONMENTAL AND PUBLIC PROTECTION CABINET

DEPARTMENT FOR ENVIRONMENTAL PROTECTION
DIVISION OF WASTE MANAGEMENT
14 REILLY ROAD
FRANKFORT, KY 40601
TELEPHONE NUMBER (502) 564-6716

REGISTERED PERMIT-BY-RULE For BENEFICIAL REUSE OF SPECIAL WASTE DEP 7059F (1/06)

GENERAL INSTRUCTIONS

- 1. APPLICABILITY This registration form must be completed and submitted to the Cabinet by persons who propose to beneficially re-use special waste.
- ASSISTANCE Questions regarding this form may be directed in writing to the Division of Waste Management, Solid Waste Branch at the address listed above, or by calling (502) 564-6716.
- 3. SUBMISSION Please type or print legibly in permanent ink. Submit the original and one (1) copy of the completed registration form to the Division of Waste Management at the address noted above. If an item is not applicable to your facility write "N/A" in the space provided.
- LAWS AND REGULATIONS Registrants are expected to understand and comply with all laws and regulations applicable to beneficial reuse of special waste.

REGISTERED PERMIT-BY-RULE BENEFICIAL REUSE OF SPECIAL WASTE

New Registration - A registration number will be assigned by the Cabinet.

Note: (If you checked item 2, complete one or both of the following two items.)

2. __ This is a proposed modification of an existing registration.

3. /	Agency Interest #:	4. Registration	n #:				
(T	he corporation, LLC, business,	Registrant Inf person, government		ion etc., that owns or operates the facility.)			
5. I	Registrant Name: Sterling V	entures, LLC d/b/	/a Sterlir	ing Materials			
6. F	Registrant Mailing Address:	376 South Broad	way				
7. (City: Lexington		8. State	e: KY 9. Zip Code: 40508			
10.	Contact Person: Samuel A.E	B. Boone	11. Title	tle:President			
12 . F	Phone #: (859) 259-9600	13. Cell #: (8	59) 621-	-4121			
14.	Fax #: (859) 259-9601	15. E-Mail Ad	ddress: al	aboone@sterlingventures.com			
Special Waste Facility Information							
16.	Facility Name: Sterling Min	е		17. County: Gallatin			
	Facility Location: 100 Sierra street or physical location only. D		s, etc.)	19. E-Mail Address:			
20. (City: Verona		2	21. Zip Code: 41092			
22. 1	Facility Contact Person: San	n Van 23.	Title: Mi	line Superintendent			
24. P	hone #: (859) 567-7300	Fax #: (859) 56	7-7313	Cell #: (859) 621-2142			
		Preparer Info he following informatifferent from the co	ation conc	ncerning the person preparing this			
27. I	Preparers Name: John Walte	ers	2	28. Company: Sterling Ventures, LLC			
29. N	Mailing Address: 376 S. Bro	adway	30 . E-ma	nail Address:johnwalters@sterlingventures.com			
31. (City: Lexington	32. St	tate: KY	33. Zip Code: 40508			
34. P	hone #:(859) 259-9600 3	5. Fax #:(859) 25	9-9601	36. Cell #: (859) 621-3990			

37.	List the source (special waste generating facility) of the special waste to be beneficially reused. If there are multiple sources and more space is needed, use additional sheets and label as Attachment 1 .
	Special waste generator: KU Ghent Generation Station, Ghent, Carroll County, Kentucky
	Special waste generator:
	Special waste generator:
	Special waste generator:
38.	Provide, as Attachment 2 , a description of the type and anticipated volume of special waste to be beneficially reused.
39.	Provide as Attachment 3 , a copy of the Toxicity Characteristic Leaching Procedure (TCLP) laboratory analysis for each type of special waste to be beneficially reused.
Note:	You may omit the TCLP analysis or specific parameters of the analysis based upon your knowledge of the Special Waste, pursuant to 40 CFR 262.11. Should you elect to do this, a certified statement accepting responsibility will be required. Polychlorinated Biphenyls (PCBs) may also be omitted from the parameters listed in 401 KAR 45:100 Section 6(20)(b). Any certified statement for the omission of the TCLP or PCB data should be labeled as Attachment 4 .

- Provide, as Attachment 5, a description of how the special waste will be managed.
- 41. Provide, as Attachment 6, a description of how management and reuse of the special waste meets the environmental performance standards of 401 KAR 30:031.
- 42. Attachment 7 is to be used to maintain a record of the special waste sources and amounts received. This form shall be utilized for quarterly reports submitted to the Cabinet.

43. Certification pursuant to 401 KAR 45:030 Section 10(4):

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for such violations."

Signature of Registrant		Date			
Name of Registrant (Type	d or Printed)				
Title					
Subscribed and sworn to b	refore me by				
this the	day of	, 20			
Notary Public Signature _					
My Commission Expires					

Attachment 2 Type and Volume of Special Waste

Sterling Ventures is proposing to use up to 800,000 tons per year of FGD Gypsum produced from the KU Ghent Power Station in Ghent Kentucky to fill mine voids in mined out sections of Sterling's underground limestone mine located at 100 Sierra Drive, Verona, Gallatin County, Kentucky. Gypsum is calcium sulfate dihydrate, or CaSO4•2H2O, which comes primarily from two sources: (i) Mined gypsum, a common mineral found around the world in sedimentary rock formations, from which it is mined or quarried, and (ii) FGD gypsum, which is produced as a byproduct from coal-fired electric utilities and is a synthetic material essentially identical in chemical structure to mined gypsum. The underground mine has the capacity to use 1,000,000 tons per year of gypsum for as long as the mine is operating at current limestone sales volumes.

FGD Gypsum

Scrubbers are attached to coal-fired power plants to limit emissions of the sulfur which is released when coal is burned. The scrubbers spray liquid lime or limestone slurry into the flue gas path, where it reacts with sulfur in the gas to form calcium sulfite, an intermediate product with little practical value. Calcium sulfite is commonly known as "scrubber sludge."

However, newer FGD scrubbing technologies can add an extra step to the scrubbing process known as "forced oxidation" which oxidizes the calcium sulfite and produces calcium sulfate dihydrate (CaSO4•2H2O), or FGD gypsum. The FGD gypsum is easily dewatered and can be marketable in the wallboard and agricultural industries.

The Ghent power plant has installed forced oxidation scrubbers on all four of its generating units with a projected FGD gypsum production of approximately 800,000 tons per year. The Ghent plant has a contract to provide the FGD Gypsum to the CertainTeed, Inc. wallboard plant located in East Carrolton, Kentucky. KU has projected CertainTeed's usage to be approximately 222,000 ton per year. Excess FGD Gypsum at Ghent is placed on the plant's Gypsum Stacking Pond. The Stacking Pond is currently listed as one of the 49 High Hazard impoundment facilities in the United States listed by the EPA in its *Coal Combustion Residues (CCR) - Surface Impoundments with High Hazard Potential Ratings* report. (See EPA530-F-09-006 June 2009 (updated August 2009)).

Because CertainTeed cannot utilize all of Ghent's FGD Gypsum, the opportunity to beneficially reuse this excess of FGD gypsum for filling Sterling's underground mine voids is an attractive alternative. In addition to providing a benefit to Sterling in filling underground voids to promote improved airflow in the mine, placing the Ghent's excess gypsum at Sterling is important to substantially reducing or eliminating the volume of excess gypsum in the gypsum stacking pond.

Attachment 3 Toxicity Characteristic Leaching Procedure Laboratory Analysis

See attached Exhibit 3-A

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FUELS

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Emisir 3A Microbac Laboratories, Inc.

Member



Chemical, Biological, Physical, Molecular, and Toxicological Services

ELECTRONIC CERTIFICATE OF ANALYSIS

1005-00672

LG & E (E ON US)
PAUL PUCKETT
EON-US / ANNUAL CCP EVALUATION

Date Reported Date Received 05/19/2010 05/11/2010

Dates Sampled

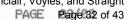
05/04/2010-05/06/2010

EON-US / ANNUAL CCP EVALUATION							Dates Sampled			03/04/2010-03/00/2010				
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Witnesses: Sinclair, Voyles, and Straight

06/28/2010 15:10 5026273243

FUELS





Microbac Laboratories, Inc.

Member

KENTUCKY TESTING LABORATORY DIVISION
3323 Gilmore Industrial Blvd. Louisville, KY 40213 502.962.6400 Fax: 502.962.6411
Evensville, IN \$12.464.9000 | Loxington, KY 859.276.3506 | Peducal, KY 270.898.3637



Chemical, Biological, Physical, Molecular, and Toxicological Services

ELECTRONIC CERTIFICATE OF ANALYSIS

1005-00672

LG & E (E ON US)
PAUL PUCKETT
EON-US / ANNUAL CCP EVALUATION

Date Reported
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05/04/2010-05/06/2010

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THIS REPORT HAS BEEN REVIEWED AND APPROVED FOR RELEASE:

LABORATORY DIRECTOR, KENTUCKY DIVISION

As regulatory limits change frequently, Microbac advises the recipient of this report to confirm such limits with the appropriate Federal, state, or local authorities before acting in reliance on the regulatory limits provided.

For any feedback concerning our services, please contact Andrew Clifton, the Laboratory Director at \$02,962,6400. You may also contact both James Nokes, President and Robert Morgan, Chief Operating Officer at president@microbac.com.

Attachment 5 Management of Special Waste

Gypsum will be excavated from the Ghent's Gypsum Stacking Pond by excavator and loaded in tarped, tri-axel dump trucks for transportation to Sterling's mine. Sterling Venture's Verona mine produces limestone from underground operations only. It does not mine any limestone from open pits. Sterling mines from three underground levels, located in solid limestone bedrock. From a geological standpoint, the sea level elevation of the roof of the uppermost level is approximately 136 feet above sea level. The roofs of the second and third levels are approximately 28 feet above, and 149 feet below sea level, respectively. From a reference point, the lowest most level of the Ohio River adjacent to the Sterling Mine is approximately 401 feet above sea level. (see Exhibit 6C)

Once at the mine, the gypsum will be dumped directly from the dump trucks, via shaft, to the first level (the "Tyrone" seam) of the underground mine. Once underground, the gypsum will be carried by loader or conveyor to the mined out areas then stacked, pushed and compacted to fill the mine voids.

Attachment 6 Management and Reuse in compliance with 401 KAR 30:031

The following is a summary of the how the management and reuse meets each of the Sections of 401 KAR 30:031.

Section 2. Floodplains.

All gypsum will be placed in Sterling's underground mine. Gypsum will not be placed or stored above ground and therefore will have no impact on, or restrict the flow of, the 100 year floodplain.

Section 3. Endangered Species.

All gypsum will be placed in Sterling's underground mine. Gypsum will not be placed or stored above ground and therefore will have no impact on, or result in the destruction of the habitat of any threatened or endangered species.

Section 4. Surface Waters.

All gypsum will be placed in Sterling's underground mine. Gypsum will not be placed or stored above ground and therefore will have no impact on, or cause a discharge into, any waters of the Commonwealth.

Section 5. Groundwater.

All gypsum will be placed in solid bedrock in an area below the bottom level of the uppermost aquifer. Gypsum will not be placed or stored above ground and therefore will have no impact on, or cause a discharge into, any waters of the Commonwealth.

The uppermost mining level of Sterling's underground mine is located in what is known as the Tyrone seam of limestone. The Tyrone Limestone in north central Kentucky contains at least five potassium bentonites. Bentonite is a soft, low-specific-gravity, expandable clay. It is altered volcanic ash and because of its peculiar property of expanding when wet, bentonite is effective as a water sealer, especially to prevent pond leakage, and is also used in rotary drilling muds to prevent contaminating formations with drilling fluid. Drillers have labeled the two most prominent Tyrone bentonite beds the Mud Cave and Pencil Cave. The bentonite acts as an acqutiard or confining layer that will prevent any contact of the gypsum with groundwater.

Attached as Exhibit 6-A is an excerpt from the U.S. Geological Survey - Hydrologic Atlas 730-K, Orville B. Lloyd, Jr., and William L. Lyke, 1995, describing the impact of the bentonite as a barrier to groundwater contact.

The roof of the uppermost mining level is over 200 feet below the bottom of any recorded well in the area. Regional wells do not extend below the bentonite levels in the Tyrone limestone. Attached as Exhibit 6-B is a listing of all recorded water wells in the area, their depth and distance between the bottom of the well and the roof of the Tyrone mining level.

Attached as Exhibit 6-C is a cross section of the Sterling's underground mine showing the Tyrone level mine in relation to the Mud Cave and Pencil Cave bentonite seams.

Section 6. Application to Land Use.

All gypsum will be placed underground. Gypsum will not be placed or stored above ground and therefore will have no impact on land use.

Section 7. Polychlorinated Biphenals.

FGD Gypsum does not contain PCBs.

Section 8. Disease.

All gypsum will be placed underground and therefore will be automatically covered. Gypsum is an inert naturally occurring mineral. Underground placement will eliminate any human health or environmental issues. No sewage sludge or septic tank materials are pumped or stored underground at Sterling's underground mine.

Section 9. Air.

Underground storage will not involve burning of gypsum, which is not a flammable material. Underground storage approximately 400 feet below the surface will prohibit the airborne release of gypsum.

Section 10. Safety.

Neither limestone mining nor gypsum produces any explosive gases or a fire hazard. Sterling's underground mine is gated, which prohibits any type of uncontrolled public access.

Section 11. Public Nuisance.

Underground storage will eliminate any public nuisance due to blowing litter, debris or other waste.

Section 12. Wetlands.

All gypsum will be placed underground. Gypsum will not be placed or stored above ground and therefore will have no impact on any wetlands

Section 13. Karst.

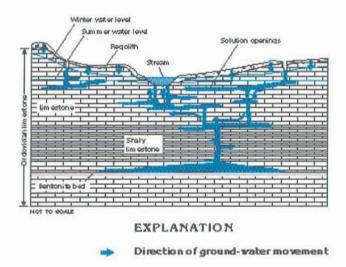
There are no sinkholes on or near the approximately 1,000 acres owned by Sterling. No surface water enters or exits the mine through any karst terrain or feature.

Section 14. Compliance.

Sterling will comply with all applicable requirements of KRS Chapter 224 and administrative regulation promulgated thereto.

Exhibit 6A

Confining units, such as beds of shaly limestone and bentonite, affect the depth to which freshwater circulates (fig. 97). Thin bentonite zones, which consist of clay particles that expand or swell when they become wet, form layers of low permeability that effectively impede the vertical movement of ground water. For example, in areas where the bentonite layers are continuous, the downward movement of ground water is restricted. This restriction isolates the ground water below the bentonite from the zone of dynamic circulation above the bentonite. U.S. Geological Survey - Hydrologic Atlas 730-K, Orville B. Lloyd, Jr., and William L. Lyke, 1995



Modified from Zurawski, Ann, 1978, Summary appraisals of the Nation's ground-water resources—Tennessee region: U.S. Geological Survey Professional Paper 813-L, 35 p.

Figure 97. The limestone and dolomite aquifers contain small quantities of insoluble material and, therefore, produce only a thin layer of residuum when weathered. Recharge water percolates through the thin layer of surface material, called regolith, and subsequent-ly moves through vertical frac-tures and horizontal bedding planes in the rocks. The slightly acidic water dissolves some of the limestone and dolomite as it moves to streams and other areas of discharge, such as springs and wells. The vertical movement of the recharge water and, therefore, the depth of de-velopment of solution openings, are restricted by zones of low permeability.



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AKGWA					Construction		Surface		Bottom	Delta to			
NUMBER	lat27	lon27	Quadrangle	County	Date	Primary Use	Elevation	Total Depth	Elevation	Mine Roof	Owner	Owner Business	Regulatory Program
210	38.77528	-84.8131	Patriot	Gallatin	3/12/1987	DOMESTIC - SINGLE HOUSEHOLD	480	96	384	248	Wessells Constru		
950	38.81611	-84.8061	Patriot	Gallatin	6/22/1987	DOMESTIC - SINGLE HOUSEHOLD	510	99	411	275	Doolin		
2070	38.7525	-84.8722	Patriot	Gallatin	1/1/1900	DOMESTIC - SINGLE HOUSEHOLD	570				Hayton		
2070	38.7525	-84.8722	Patriot	Gallatin	1/1/1900	DOMESTIC - SINGLE HOUSEHOLD	570				Hayton		
2070	38.7525	-84.8722	Patriot	Gallatin	2/28/1986	DOMESTIC - SINGLE HOUSEHOLD	570	90	480	344	Hayton		
2070	38.7525	-84.8722	Patriot	Gallatin	2/28/1986	DOMESTIC - SINGLE HOUSEHOLD	570	90	480	344	Hayton		
2071	38.7975	-84.8078	Patriot	Gallatin	4/7/1986	DOMESTIC - SINGLE HOUSEHOLD	470	78	392	256	Wilker / Mcintos		
2072	38.79167	-84.8039	Patriot	Gallatin	4/22/1986	DOMESTIC - SINGLE HOUSEHOLD	460	57	403	267	Perry		
3030	38.82306	-84.7594	Patriot	Gallatin	8/13/1985	DOMESTIC - SINGLE HOUSEHOLD	600	100	500	364	Whalen		
3885	38.82278	-84.8069	Patriot	Gallatin	7/30/1987	DOMESTIC - SINGLE HOUSEHOLD	524	142	382	246	Sproul		
6426	38.79722	-84.8072	Patriot	Gallatin	3/28/1988	DOMESTIC - SINGLE HOUSEHOLD	475	50	425	289	Hudepohl		
6427	38.775	-84.9003	Florence	Gallatin	8/31/1988	INDUSTRIAL - GENERAL	485	92	393	257		Irving Materials Inc	
6429	38.7875	-84.8064	Patriot	Gallatin	5/16/1989	DOMESTIC - SINGLE HOUSEHOLD	475	65	410	274	Heil		
7861		-84.7808	Rising Sun	Boone	10/8/1990	DOMESTIC - SINGLE HOUSEHOLD	495	70	425	289	Ralston		
8554	38.79639	-84.8078	Patriot	Gallatin	10/29/1987	DOMESTIC - SINGLE HOUSEHOLD	470	93	377	241	Schwab		
10409		-84.9117	Florence	Gallatin	1/22/1993	DOMESTIC - SINGLE HOUSEHOLD	550	83	467	331	Fender		
14147			Rising Sun	Boone	12/13/1988	DOMESTIC - SINGLE HOUSEHOLD	530	86	444	308	Wood		
14148		-84.7817	Rising Sun	Boone	12/14/1988	DOMESTIC - SINGLE HOUSEHOLD	430	93	337	201	Wood		
20278		-84.8475	Patriot	Gallatin	8/18/1986	DOMESTIC - SINGLE HOUSEHOLD	470	80	390	254	Boschert		
20583		-84.7597	Rising Sun	Boone	1/1/1900		550				Waljih		
21565		-84.7294	Verona	Grant	10/3/1986	DOMESTIC - SINGLE HOUSEHOLD	710	80	630	494	Ellis		
21577		-84.7586	Rising Sun	Boone	6/5/1994	DOMESTIC - SINGLE HOUSEHOLD	520	80	440	304	Wilbur		
27010	38.8575	-84.7864	Patriot	Boone	6/8/1992	DOMESTIC - SINGLE HOUSEHOLD	477	56	421	285	Fred		
29603		-84.9396	Florence	Gallatin	1/1/1900	PUBLIC - TRANSIENT, NON-COMMUNITY	460	50	721	203	Loewendick	Rivers Edge Campground	
34428		-84.6744	Union	Boone	7/20/1993	POBLIC - TRANSIENT, NON-COMMONTT	810	63	747	611	Vaske	Mivers Eagle Campar Cama	
34436	38.84806	-84.765	Patriot	Boone	1/20/1987	DOMESTIC - SINGLE HOUSEHOLD	495	64	431	295	Gilliand		
	38.90361					DOMESTIC - SINGLE HOUSEHOLD	600	100	500	364	Kurkel		
34438			Rising Sun	Boone	12/10/1986	DOINESTIC - SINGLE HOOSEHOLD	810	83	727	591	Allen		
34474	38.89556 38.89694	-84.6694	Union	Boone	4/23/1993	DOMESTIC - SINGLE HOUSEHOLD	820	103	717	581	McDaniel		
34475			Union	Boone	12/4/1992				401	265	MicDaillei	Gallatin County Schools	
37305		-84.8903	Florence	Gallatin	10/1/1994	HEAT PUMP - OPEN LOOP	495	94				Steel Technologies Inc	
37311		-84.9856	Florence	Gallatin	1/19/1995	INDUSTRIAL - GENERAL	470	91	379	243		Warsaw Water Works	Drinking Water
37376		-84.9017	Florence	Gallatin	1/1/1930	PUBLIC - COMMUNITY	491	136	355	219			
37377		-84.9017	Florence	Gallatin	1/1/1930	PUBLIC - COMMUNITY	491	96	395	259	C!4 -	Warsaw Water Works	Drinking Water
37378	38.77417		Florence	Gallatin	1/1/1967	AGRICULTURE - LIVESTOCK WATERING	505	78	427	291	Smith	Communication College	
37400	38.77861		Florence	Gallatin	4/27/1995		500				Oldendick	Sugar Bay Golf Inc	
	38.77889		Florence	Gallatin	1/1/1965		503				Oldendick	Sugar Bay Golf Inc	
48660	38.77528		Florence	Gallatin	1/1/1900	DOMESTIC - SINGLE HOUSEHOLD	510				Beall		
	38.78583		Florence	Gallatin	11/1/1999	HEAT PUMP - OPEN LOOP	495					Gallatin County Schools	**************************************
49377	38.77063		Florence	Gallatin	2/28/2000	PUBLIC - COMMUNITY	500					Gallatin County Water District	Drinking Water
51920	38.89969		Rising Sun	Boone	1/1/1974	PUBLIC - TRANSIENT, NON-COMMUNITY	470	9	461	325		Camp Turn About	
	38.85639		Patriot	Boone	4/19/2002	DOMESTIC - SINGLE HOUSEHOLD	490	70	420	284		Big Bone Marina	
58332	38.85639	-84.7775	Patriot	Boone	5/1/2002	DOMESTIC - SINGLE HOUSEHOLD	460	63	397	261		Big Bone Marina	
58338	38.89111	-84.7776	Rising Sun	Boone	1/23/2002	DOMESTIC - SINGLE HOUSEHOLD	605	80	525	389	Parker		
65141	38.82028	-84.8053	Patriot	Gallatin	1/1/1900	INDUSTRIAL - GENERAL	523					Nugent Sand Co - Warsaw Plant	
40004237	38.72534	-84.7774	Glencoe	Grant		DOMESTIC - SINGLE HOUSEHOLD							
40004241	38.78173	-84.8874	Florence	Gallatin		UNKNOWN	475						
40004243	38.79923	-84.8049	Patriot IN	Gallatin		DOMESTIC - SINGLE HOUSEHOLD		140					
40004245	38.81673	-84.8169	Patriot IN	Gallatin		DOMESTIC - SINGLE HOUSEHOLD		101					
40005375	38.77145	-84.9049	Florence	Gallatin		UNKNOWN	515						
40005376	38.77423	-84.9747	Florence	Gallatin		UNKNOWN	455						
40005378	38.78257	-84.9019	Florence	Gallatin		PUBLIC	490	140	350	214			
40005886			Glencoe	Grant		UNKNOWN							

AKGWA					Construction	ı .	Surface		Bottom	Delta to			
NUMBER	lat27	lon27	Quadrangle	County	Date	Primary Use	Elevation	Total Depth	Elevation	Mine Roof	Owner	Owner Business	Regulatory Program
40005892	38.76951	-84.9305	Florence	Gallatin		DOMESTIC - SINGLE HOUSEHOLD		55					
40005893	38.76951	-84.9305	Florence	Gallatin		UNKNOWN	460						
40005894	38.77395	-84.9747	Florence	Gallatin		DOMESTIC - SINGLE HOUSEHOLD		58					
40005895	38.85867	-84.7858	Patriot IN	Boone		DOMESTIC - SINGLE HOUSEHOLD	490	29	461	325			
40006041	38.78173	-84.8874	Florence	Gallatin		DOMESTIC - SINGLE HOUSEHOLD		40					
40006325	38.77812	-84.8761	Florence	Gallatin		UNKNOWN	510		510	374			
40006326	38.78173	-84.8874	Florence	Gallatin		UNKNOWN	475		475	339			
40006327	38.79479	-84.8077	Patriot IN	Gallatin	,	DOMESTIC - SINGLE HOUSEHOLD		60					
40006328	38.79923	-84.8049	Patriot	Gallatin		UNKNOWN	490						
40006757	38.72534	-84.7774	Glencoe	Grant		UNKNOWN							
40006762	38.77145	-84.9049	Florence	Gallatin		DOMESTIC - SINGLE HOUSEHOLD		146					
40006763	38.77423	-84.9747	Florence	Gallatin		DOMESTIC - SINGLE HOUSEHOLD		87					
40006764	38.86256	-84.7527	Patriot IN	Boone		PUBLIC							
40007580	38.72618	-84.7655	Glencoe	Grant		DOMESTIC - SINGLE HOUSEHOLD							
40007585	38.74757	-84.9699	Sanders	Gallatin		DOMESTIC - SINGLE HOUSEHOLD							
40007586	38.77395	-84.9747	Florence	Gallatin		UNKNOWN	453						
40007588	38.77812	-84.8761	Florence	Gallatin		DOMESTIC - SINGLE HOUSEHOLD		80					
80003234	38.8625	-84.6614	Verona	Boone	7/22/1993	ITORING WELL - WATER LEVEL MONITORING	800	18	782	646		Bavarian Trucking Co Inc	Solid Waste
80003235	38.86139	-84.6572	Verona	Boone	7/14/1993	ITORING WELL - WATER LEVEL MONITORING	800	20.7	779.3	643.3		Bavarian Trucking Co Inc	Solid Waste
80003236	38.86083	-84.6592	Verona	Boone	7/10/1993	ITORING WELL - WATER LEVEL MONITORING	780	17.5	762.5	626.5		Bavarian Trucking Co Inc	Solid Waste
80003239	38.85917	-84.6619	Verona	Boone	7/22/1993	MONITORING WELL - AMBIENT MONITORING	740	18.2	721.8	585.8		Bavarian Trucking Co Inc	Solid Waste
80003240	38.85944	-84.6628	Verona	Boone	7/10/1993	MONITORING WELL - AMBIENT MONITORING	720	27	693	557		Bavarian Trucking Co Inc	Solid Waste
80003241	38.85972	-84.6639	Verona	Boone	7/10/1993	MONITORING WELL - AMBIENT MONITORING	720	22.9	697.1	561.1		Bavarian Trucking Co Inc	Solid Waste
80003242	38.85917	-84.665	Verona	Boone	7/21/1993	MONITORING WELL - AMBIENT MONITORING	720	18.4	701.6	565.6		Bavarian Trucking Co Inc	Solid Waste
80003243	38.85972	-84.6667	Verona	Boone	7/21/1993	MONITORING WELL - AMBIENT MONITORING	700	18.1	681.9	545.9		Bavarian Trucking Co Inc	Solid Waste
80003244	38.85944	-84.6678	Verona	Boone	7/20/1993	MONITORING WELL - AMBIENT MONITORING	720	18.9	701.1	565.1		Bavarian Trucking Co Inc	Solid Waste
80003245	38.85556	-84.6678	Verona	Boone	12/30/2000	MONITORING WELL - AMBIENT MONITORING	800	18.1	781.9	645.9		Bavarian Trucking Co Inc	Solid Waste
80003245	38.85556	-84.6678	Verona	Boone	12/30/2000	MONITORING WELL - AMBIENT MONITORING	800	18.1	781.9	645.9		Bavarian Trucking Co Inc	Solid Waste
80003245	38.85556	-84.6678	Verona	Boone	7/14/1993	MONITORING WELL - AMBIENT MONITORING	800	18.1	781.9	645.9		Bavarian Trucking Co Inc	Solid Waste
80003245	38.85556	-84.6678	Verona	Boone	7/14/1993	MONITORING WELL - AMBIENT MONITORING	800	18.1	781.9	645.9		Bavarian Trucking Co Inc	Solid Waste
80003245	38.85556	-84.6678	Verona	Boone	12/30/2000	MONITORING WELL - AMBIENT MONITORING	800	18.1	781.9	645.9		Bavarian Trucking Co Inc	Solid Waste
80003245	38.85556	-84.6678	Verona	Boone	12/30/2000	MONITORING WELL - AMBIENT MONITORING	800	18.1	781.9	645.9		Bavarian Trucking Co Inc	Solid Waste
80003245	38.85556	-84.6678	Verona	Boone	7/14/1993	MONITORING WELL - AMBIENT MONITORING	800	18.1	781.9	645.9		Bavarian Trucking Co Inc	Solid Waste
80003245	38.85556	-84.6678	Verona	Boone	7/14/1993	MONITORING WELL - AMBIENT MONITORING	800	18.1	781.9	645.9		Bavarian Trucking Co Inc	Solid Waste
80003246	38.86	-84.6642	Verona	Boone	7/27/1993	MONITORING WELL - AMBIENT MONITORING	720	18.3	701.7	565.7		Bavarian Trucking Co Inc	Solid Waste
80011401	38.86139	-84.6542	Verona	Boone	1/1/1900	MONITORING WELL - AMBIENT MONITORING	847.49					Bavarian Trucking Co Inc	Solid Waste
80011402	38.86167	-84.6539	Verona	Boone	1/1/1900	MONITORING WELL - AMBIENT MONITORING	847.92					Bavarian Trucking Co Inc	Solid Waste
80011403	38.85778	-84.6592	Verona	Boone	1/1/1900	MONITORING WELL - AMBIENT MONITORING	833.59					Bavarian Trucking Co Inc	Solid Waste
80011404	38.85806	-84.6589	Verona	Boone	1/1/1900	MONITORING WELL - AMBIENT MONITORING	833.65					Bavarian Trucking Co Inc	Solid Waste
80011405	38.85583	-84.6619	Verona	Boone	1/1/1900	MONITORING WELL - AMBIENT MONITORING	834.72					Bavarian Trucking Co Inc	Solid Waste
80011406	38.855	-84.6639	Verona	Boone	1/1/1900	MONITORING WELL - AMBIENT MONITORING	816.7					Bavarian Trucking Co Inc	Solid Waste
80011407	38.85611	-84.6672	Verona	Boone	1/1/1900	MONITORING WELL - AMBIENT MONITORING	800.5					Bavarian Trucking Co Inc	Solid Waste
80011408 3	38.85861	-84.67	Verona	Boone	1/1/1900	MONITORING WELL - AMBIENT MONITORING	766.27					Bavarian Trucking Co Inc	Solid Waste
80011409	38.86	-84.6692	Verona	Boone	1/1/1900	MONITORING WELL - AMBIENT MONITORING	767.85					Bavarian Trucking Co Inc	Solid Waste
80011410 3	38.86222	-84.6689	Verona	Boone	1/1/1900	MONITORING WELL - AMBIENT MONITORING	641.24					Bavarian Trucking Co Inc	Solid Waste
80011411 3	38.86222	-84.6669	Verona	Boone	1/1/1900	MONITORING WELL - AMBIENT MONITORING	643.85					Bavarian Trucking Co Inc	Solid Waste
80011412 3	88.86222	-84.6681	Verona	Boone	1/1/1900	MONITORING WELL - AMBIENT MONITORING	604.9					Bavarian Trucking Co Inc	Solid Waste
80011413	38.8625	-84.6622	Verona	Boone	1/1/1900	MONITORING WELL - AMBIENT MONITORING	828.1					Bavarian Trucking Co Inc	Solid Waste
80011414	38.8625	-84.6622	Verona	Boone	1/1/1900	MONITORING WELL - AMBIENT MONITORING	828.01					Bavarian Trucking Co Inc	Solid Waste
80011415 3	88.86417	-84.6594	Verona	Boone	1/1/1900	MONITORING WELL - AMBIENT MONITORING	780.48					Bavarian Trucking Co Inc	Solid Waste
80011416 3	88.86417	-84.6589	Verona	Boone	1/1/1900	MONITORING WELL - AMBIENT MONITORING	780.26					Bavarian Trucking Co Inc	Solid Waste
80011417 3	88.86556	-84.6625	Verona	Boone	1/1/1900	MONITORING WELL - AMBIENT MONITORING	784.79					Bavarian Trucking Co Inc	Solid Waste

AKGWA					Construction		Surface		Bottom	Delta to			
NUMBER	lat27	lon27	Quadrangle	County	Date	Primary Use	Elevation	Total Depth	Elevation	Mine Roof	Owner	Owner Business	Regulatory Program
80011418	38.86361	-84.6642	Verona	Boone	1/1/1900	MONITORING WELL - AMBIENT MONITORING	762.46					Bavarian Trucking Co Inc	Solid Waste
	38.86361	-84.6583	Verona	Boone	1/1/1900	MONITORING WELL - AMBIENT MONITORING	784.17					Bavarian Trucking Co Inc	Solid Waste
	38.90417	-84.8358	Rising Sun	Boone	11/10/1980	MONITORING WELL - AMBIENT MONITORING	530	86	444	308		Cincinnati Gas & Electric	Solid Waste
	38.90417	-84.8358	Rising Sun	Boone	11/10/1980	MONITORING WELL - AMBIENT MONITORING	530	86	444	308		Duke Energy Kentucky Inc	Solid Waste
	38.90083	-84.8483	Rising Sun	Boone	11/26/1980	MONITORING WELL - AMBIENT MONITORING	475	57	418	282		Cincinnati Gas & Electric	Solid Waste
		-84.8483	Rising Sun	Boone	11/26/1980	MONITORING WELL - AMBIENT MONITORING	475	57	418	282		Duke Energy Kentucky Inc	Solid Waste
80012134	38.90083	-84.8411	Rising Sun	Boone	11/13/1980	MONITORING WELL - AMBIENT MONITORING	475	108	367	231		Cincinnati Gas & Electric	Solid Waste
80012134	38.90083	-84.8411	Rising Sun	Boone	11/13/1980	MONITORING WELL - AMBIENT MONITORING	475	108	367	231		Duke Energy Kentucky Inc	Solid Waste
80012135		-84.8361	Rising Sun	Boone	3/28/1991	MONITORING WELL - AMBIENT MONITORING	475	33	442	306		Cincinnati Gas & Electric	Solid Waste
80012135	38.90111	-84.8361	Rising Sun	Boone	3/28/1991	MONITORING WELL - AMBIENT MONITORING	475	33	442	306		Duke Energy Kentucky Inc	Solid Waste
80012488	38.81611	-84.7694	Patriot	Gallatin	4/20/1994	MONITORING WELL - AMBIENT MONITORING	680	18	662	526		Old Starlite Tavern	UST
80012489	38.81611	-84.7694	Patriot	Gallatin	4/20/1994	MONITORING WELL - AMBIENT MONITORING	680	15	665	529		Old Starlite Tavern	UST
80012490	38.81611	-84.7694	Patriot	Gallatin	4/20/1994	MONITORING WELL - AMBIENT MONITORING	680	8.5	671.5	535.5		Old Starlite Tavern	UST
80026034	38.85972	-84.6603	Verona	Boone	5/8/1995	MONITORING WELL - AMBIENT MONITORING	759.34	16	743.34	607.34		Bavarian Trucking Co Inc	Solid Waste
80026035	38.86	-84.665	Verona	Boone	5/10/1995	MONITORING WELL - AMBIENT MONITORING	723.22	16.3	706.92	570.92		Bavarian Trucking Co Inc	Solid Waste
80026544	38.90278	-84.8417	Rising Sun	Boone	11/1/1993	MONITORING WELL - AMBIENT MONITORING	540	80	460	324		Cincinnati Gas & Electric	Solid Waste
80026544	38.90278	-84.8417	Rising Sun	Boone	11/1/1993	MONITORING WELL - AMBIENT MONITORING	540	80	460	324		Duke Energy Kentucky Inc	Solid Waste
80026545	38.90056	-84.8419	Rising Sun	Boone	10/13/1995	MONITORING WELL - AMBIENT MONITORING	475	41	434	298		Cincinnati Gas & Electric	Solid Waste
80026545	38.90056	-84.8419	Rising Sun	Boone	10/13/1995	MONITORING WELL - AMBIENT MONITORING	475	41	434	298		Duke Energy Kentucky Inc	Solid Waste
80026547	38.90417	-84.8444	Rising Sun	Boone	10/17/1995	MONITORING WELL - AMBIENT MONITORING	520	80.5	439.5	303.5		Cincinnati Gas & Electric	Solid Waste
80026547	38.90417	-84.8444	Rising Sun	Boone	10/17/1995	MONITORING WELL - AMBIENT MONITORING	520	80.5	439.5	303.5		Duke Energy Kentucky Inc	Solid Waste
80026549	38.90194	-84.8292	Rising Sun	Boone	10/18/1995	MONITORING WELL - AMBIENT MONITORING	470	30.5	439.5	303.5		Cincinnati Gas & Electric	Solid Waste
80026549	38.90194	-84.8292	Rising Sun	Boone	10/18/1995	MONITORING WELL - AMBIENT MONITORING	470	30.5	439.5	303.5		Duke Energy Kentucky Inc	Solid Waste
80029573	38.90121	-84.8476	Rising Sun	Boone	11/30/2005	MONITORING WELL - AMBIENT MONITORING		120				Cincinnati Gas & Electric	Solid Waste
80029573	38.90121	-84.8476	Rising Sun	Boone	11/30/2005	MONITORING WELL - AMBIENT MONITORING		120				Duke Energy Kentucky Inc	Solid Waste
80029577	38.902	-84.8484	Rising Sun	Boone	12/2/2005	MONITORING WELL - AMBIENT MONITORING		120				Cincinnati Gas & Electric	Solid Waste
80029577	38.902	-84.8484	Rising Sun	Boone	12/2/2005	MONITORING WELL - AMBIENT MONITORING		120				Duke Energy Kentucky Inc	Solid Waste
80029864	38.74278	-84.8358	Glencoe	Gallatin	5/29/1996	MONITORING WELL - AMBIENT MONITORING	680	7.5	672.5	536.5		Glencoe Carry-out	UST
80029865	38.74278	-84.8358	Glencoe	Gallatin	5/29/1996	MONITORING WELL - AMBIENT MONITORING	680	12	668	532		Glencoe Carry-out	UST
80029872	38.74278	-84.8358	Glencoe	Gallatin	6/7/1996	MONITORING WELL - AMBIENT MONITORING	680	15	665	529		Glencoe Carry-out	UST
80029873	38.74278	-84.8358	Glencoe	Gallatin	6/7/1996	MONITORING WELL - AMBIENT MONITORING	680	13	667	531		Glencoe Carry-out	UST
80029874	38.74278	-84.8358	Glencoe	Gallatin	6/7/1996	MONITORING WELL - AMBIENT MONITORING	680	23	657	521		Glencoe Carry-out	UST
80029875	38.74278	-84.8358	Glencoe	Gallatin	6/7/1996	MONITORING WELL - AMBIENT MONITORING	680	30	650	514		Glencoe Carry-out	UST
80030354	38.74278	-84.8358	Glencoe	Gallatin	6/19/1996	MONITORING WELL - AMBIENT MONITORING	680	30	650	514		Glencoe Carry-out	UST
80030355	38.74278	-84.8358	Glencoe	Gallatin	6/19/1996	MONITORING WELL - AMBIENT MONITORING	680	18	662	526		Glencoe Carry-out	UST
80030356	38.74278	-84.8358	Glencoe	Gallatin	A 3513 1 1513 151 151	MONITORING WELL - AMBIENT MONITORING	680	43	637	501		Glencoe Carry-out	UST
80030955	38.74222	-84.8347	Glencoe	Gallatin	9/4/1996	MONITORING WELL - AMBIENT MONITORING	690	25	665	529		Glencoe Carry-out	UST
80030956	38.74222	-84.8347	Glencoe	Gallatin	9/4/1996	MONITORING WELL - AMBIENT MONITORING	690	25	665	529		Glencoe Carry-out	UST
80032432		-84.6483	Verona	Boone	7/12/1999	MONITORING WELL - AMBIENT MONITORING	840	23.7	816.3	680.3		Bavarian Trucking Co Inc	Solid Waste
80032433		-84.6483	Verona	Boone	7/12/1999	MONITORING WELL - AMBIENT MONITORING	831	30.5	800.5	664.5		Bavarian Trucking Co Inc	Solid Waste
80035870			Glencoe	Gallatin		MONITORING WELL - AMBIENT MONITORING	700	30.5	669.5	533.5		Glencoe Carry-out	UST
80035879		-84.8347	Glencoe	Gallatin	, ,	MONITORING WELL - AMBIENT MONITORING	690	6	684	548		Glencoe Carry-out	UST
80035880		-84.8347	Glencoe	Gallatin		MONITORING WELL - AMBIENT MONITORING	690	7	683	547		Glencoe Carry-out	UST
80037728			Rising Sun	Boone	,,	MONITORING WELL - AMBIENT MONITORING	460					Kentucky State Parks	LICT
80038750 3		-84.8358	Glencoe	Gallatin		MONITORING WELL - AMBIENT MONITORING	680	20.2	659.8	523.8		Glencoe Carry-out	UST
80039695			Florence	Gallatin		MONITORING WELL - AMBIENT MONITORING	460	15.5	444.5	308.5		Dans Marina	UST
80039696			Florence	Gallatin		MONITORING WELL - AMBIENT MONITORING	460	15.5	444.5	308.5		Dans Marina	UST
80039697 3			Florence	Gallatin		MONITORING WELL - AMBIENT MONITORING	460	15.5	444.5	308.5		Dans Marina	UST
80040053			Florence	Gallatin		MONITORING WELL - AMBIENT MONITORING	490	139	351	215		Warsaw Water Works	
80040054 3			Florence	Gallatin		MONITORING WELL - AMBIENT MONITORING	480	117	363	227		Warsaw Water Works	LICT
80043988 3			Glencoe	Carroll		MONITORING WELL - AMBIENT MONITORING	680	25	655	519		Glencoe Carry-out	UST
80044011 3	38.87861	-84.6994	Union	Boone	12/4/2001	MONITORING WELL - AMBIENT MONITORING	740	6.5	733.5	597.5		Matracia & Matracia Partnershi	UST

AKGWA				Construction		Surface		Bottom	Delta to			
NUMBER lat27	lon27	Quadrangle	County	Date	Primary Use	Elevation	Total Depth	Elevation	Mine Roof	Owner	Owner Business	Regulatory Program
80044012 38.87861	-84.6994	Union	Boone	12/4/2001	MONITORING WELL - AMBIENT MONITORING	740	10.2	729.8	593.8		Matracia & Matracia Partnershi	UST
80044013 38.87861	-84.6994	Union	Boone	12/4/2001	MONITORING WELL - AMBIENT MONITORING	740	9.3	730.7	594.7		Matracia & Matracia Partnershi	UST
80044014 38.87861	-84.6994	Union	Boone	12/4/2001	MONITORING WELL - AMBIENT MONITORING	740	9	731	595		Matracia & Matracia Partnershi	UST
80049181 38.76056	-84.7889	Patriot	Gallatin	5/4/2004	MONITORING WELL - AMBIENT MONITORING	850					Napoleon Grocery	UST
80049182 38.76056	-84.7889	Patriot	Gallatin	5/3/2004	MONITORING WELL - AMBIENT MONITORING	850					Napoleon Grocery	UST
80049185 38.76056	-84.7889	Patriot	Gallatin	5/3/2004	MONITORING WELL - AMBIENT MONITORING	850					Napoleon Grocery	UST
80049186 38.76056	-84.7889	Patriot	Gallatin	5/4/2004	MONITORING WELL - AMBIENT MONITORING	850					Napoleon Grocery	UST
80049425 38.87861	-84.6994	Union	Boone	1/5/2004	MONITORING WELL - AMBIENT MONITORING	740	6	734	598		Matracia & Matracia Partnershi	UST
80049426 38.87861	-84.6994	Union	Boone	1/5/2004	MONITORING WELL - AMBIENT MONITORING	740	8	732	596		Matracia & Matracia Partnershi	UST
80049427 38.87861	-84.6994	Union	Boone	1/5/2004	MONITORING WELL - AMBIENT MONITORING	740	8.5	731.5	595.5		Matracia & Matracia Partnershi	UST
80049428 38.87861	-84.6994	Union	Boone	1/5/2004	MONITORING WELL - AMBIENT MONITORING	740	6.5	733.5	597.5		Matracia & Matracia Partnershi	UST
80049429 38.87861	-84.6994	Union	Boone	1/5/2004	MONITORING WELL - AMBIENT MONITORING	740	4	736	600		Matracia & Matracia Partnershi	UST
80050961 38.85639	-84.6669	Verona	Boone	11/9/2005	MONITORING WELL - AMBIENT MONITORING	800					Bavarian Trucking Co Inc	Solid Waste
80053954 38.90083	-84.8369	Rising Sun	Boone	9/20/2007	MONITORING WELL - AMBIENT MONITORING		45				Duke Energy Kentucky Inc	Solid Waste
80053955 38.90389	-84.8369	Rising Sun	Boone	9/18/2007	MONITORING WELL - AMBIENT MONITORING		117.5				Duke Energy Kentucky Inc	Solid Waste

Bentonites

1st level

2nd level

3rd level

Tyrone

Limestone

Oregon Formation

Camp Nelson Limestone

Bridge Group

Ordovician

Exhibit 6C

Sterling Materials - Verona, KY **Underground Cross Section**



Pencil Cave Bentonite Seam

Thickness: ≈ 18" Elevation: +266'



Mud Cave Bentonite Seam Thickness: ≈ 24" Elevation: +247'

Surface Varies from 500' to 800'

Gypsum – Delivery Shaft

+266' - Pencil Cave Bentonite Seam Elevation

+247' - Mud Cave Bentonite Seam Elevation +136' (Avg Level 1 Ceiling Elevation) 1st Level +86' (Avg Level 1 Floor Elevation)

> 2nd Level +2' (Avg Level 1 Floor Elevation)

+28' (Avg Level 2 Ceiling Elevation)

-149' (Avg Level 3 Ceiling Elevation) 3rd Level

-182' (Avg Level 1 Floor Elevation)

+500' (Top of Slope Elevation)

+393' (Mine Entrance Elevation)

Interior Mine Photo: Typical Storage Area

Drawing Not to Scale.

Notes:

- ❖ Mine ceiling and floor elevations are based on average elevations across each level.
- ❖ Bentonite Seam and Rock Stratigraphy Information Resource: Kentucky Geological Survey, University of Kentucky, Lexington Series X, 1974. High Carbonate Rock in the High Bridge Group (Middle Ordovician), Boone County, Kentucky. Author: Garland R. Dever, Jr.
- Elevations are referenced at Sea Level.

DEP 7059F (1/06)

Attachment 7 Special Waste Sources and Amounts Log Sheet

1. Registrant Name:	2. County:	_
3. Agency Interest #:	4. Registration #:	
5. Contact Person:	6. Title:	
7. Phone #: () 8. Fax	#: ()	
Report prepared for the months of:	, and Year: _	
Name of Special Was (Source of Specia		ed
under my direction or supervision in a qualified personnel properly gathered my inquiry of the person or persons di information submitted is, to the best o	hat this document and all attachments were prepared to assure that and evaluated the information submitted. Based rectly responsible for gathering the information, f my knowledge and belief, true, accurate, and ignificant penalties for submitting false informat prisonment for such violations."	d on , the
Authorized Signature	Date	
Name: (Typed or Printed)	Title:	

KENTUCKY UTILITIES COMPANY LOUISVILLE GAS AND ELECTRIC COMPANY

First Data Request for Information to Sterling Ventures, LLC Dated July 2, 2015

Case No. 2015-00194

Question No. 21

Witness: Caryl M. Pfeiffer/Counsel

- Q-21. With respect to the Synthetic Materials ("Synmat") contract, please answer the following. Please provide copies of all equipment specifications, calculations, work 10 papers, spreadsheets and any other supporting documents, used in support of your responses.
 - . . .
 - i. Has the Company investigated or had discussions with Synmat or any other party as to whether anticipated closings of coal-fired power plants and/or the conversion of coal-fired power plants to natural gas will have an impact on future demand for gypsum and/or fly ash from Ghent or Trimble County. If so, please provide all emails, correspondence, PVRR analyses, spreadsheets, documentation, internal or external presentations, business cases, forecasts and any other information prepared, reviewed or discussed with respect to anticipated future demand.

A-21. ORIGINAL RESPONSE

i. General discussions have taken place on what impact plant closings could have on the marketability of by-product; however, no conclusive action has taken place. Concerning documents responsive to this request, see attached. Counsel for the Companies is continuing to undertake a reasonable and diligent search for other such documents and will reasonably supplement this response no later than Monday July 20, 2015.

SUPPLEMENTAL RESPONSE

i. No additional responsive documents were found.

KENTUCKY UTILITIES COMPANY LOUISVILLE GAS AND ELECTRIC COMPANY

First Data Request for Information to Sterling Ventures, LLC Dated July 2, 2015

Case No. 2015-00194

Question No. 28

Witness: John N. Voyles/R. Scott Straight

- Q-28. Exhibit S attached to Sterling's Complaint is a PVRR calculation for Sterling's proposal to use an industrial site with an existing barge permit on the northern edge of Warsaw, Kentucky approximately 9 miles south of Sterling's mine as a site for a barge unloading facility (the "Warsaw barge site"). Attached to Exhibit S are the assumptions on which the PVRR calculation is based (the "Support Document").
 - a. Attached as Attachment A to this Data Request is details of the barge site Sterling referred to in its emails to Scott Straight on December 5th, December 11th and December 30th of 2014.

. . .

ii. Please provide copies of all e-mails, correspondence, PVRR analyses, spreadsheets, documentation, internal or external presentations, business cases and any other information prepared and reviewed or discussed with respect to the option of using the Warsaw barge site in connection with Sterling's proposal for beneficial use of Trimble County's CCR.

A-28 ORIGINAL RESPONSE

a. ii. See the attached documents. Counsel for the Companies is continuing to undertake a reasonable and diligent search for other such documents and will reasonably supplement this response no later than Monday, July 20, 2015.

Certain documents responsive to this request are not being provided because they contain communications with counsel and the mental impressions of counsel, which information is protected from disclosure by the attorney-client privilege and the work product doctrine. The Companies will file no later than Monday, July 20, 2015, a privilege log describing the responsive documents the Companies are not producing on the ground of attorney-client or work product privilege.

SUPPLEMENTAL RESPONSE

a. ii. See the attached documents.

Certain documents responsive to this request are not being provided because they contain communications with counsel and the mental impressions of counsel, which information is protected from disclosure by the attorney-client privilege and the work product doctrine. The Companies are filing contemporaneously herewith a privilege log describing the responsive documents the Companies are not producing on the ground of attorney-client or work product privilege.

From: John Walters(johnwalters@sterlingventures.com)

To: Straight, Scott

CC: BCC:

Subject: Sterling Ventures alternative to Trimble County Landfill

Sent: 12/30/2014 12:25:31 PM -0500 (EST)

Attachments:

Scott

I have not heard anything in response to my December 11 e-mail asking if LG&E would like to sit down and talk about the options and logistical issues of barging CCRs to our facility as an alternative to the building the new Trimble County Landfill. Is this an alternative that LG&E wants to explore?

John

John W. Walters, Jr. Sterling Ventures, LLC 376 South Broadway Lexington, KY 40508 Phone (859) 259-9600 Fax (859) 259-9601

johnwalters@sterlingventures.com

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