PRELIMINARY ENGINEERING NOT FOR CONSTRUCTION

TECHNICAL MEMORANDUM

ch2m.

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REVISED Exhibit JNV-3

Coal Combustion Residual Pond Closure Evaluation: Mill Creek Generating Station

PREPARED FOR:Louisville Gas & Electric Company and Kentucky Utilities CompanyPREPARED BY:CH2M HILL Engineers

DATE: September 29, 2015

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1 Executive Summary

Louisville Gas & Electric Company and Kentucky Utilities Company (LG&E-KU) tasked CH2M HILL Engineers (CH2M) with performing coal combustion residuals (CCR) evaluations for eight sites to develop conceptual CCR ash pond closure approaches and cost estimates. The generating stations under evaluation are Ghent, Trimble County, Mill Creek, E.W. Brown, Cane Run, Green River, Tyrone, and Pineville.

This technical memorandum applies to Mill Creek Generating Station. The following scope activities were completed:

- Reviewed LG&E-KU provided historical CCR information and kickoff meeting workshop (June 2015).
- Developed a CCR pond closure approach that considers regulatory, civil, geotechnical, and stormwater aspects as it relates to CCR and ash ponds and associated cost estimates for the site. Discussion of the conceptual CCR pond closure approach is included in Section 2, and drawings are contained in Attachment 1.
- The Ash Treatment Basin (ATB), Construction Pond, Clearwell Pond, Emergency Pond, and Dead Storage Pond were identified as the applicable CCR units for Mill Creek. Other CCR units that may be affected by the CCR regulations at the site but that were not evaluated further include the Charah Gypsum Beneficial Reuse Facility, Gypsum Stockpile Area (80,000 tons), CCR Landfill, Fly Ash Silo and Loadout areas, Retired CCR Landfill, and Former Poz-O-Tec Fill Area.
- Construct new concrete process tanks (four) for management of wastewater that can no longer be managed in the ponds that will be closed; construct dewatering facility for removing water from solids.
- The estimated cost for closing the ponds is summarized in Table 1-1. Detailed cost information is included in Attachment 2.

Proposed Conceptual CCR Pond Closure Approach	Low (-30%)	Total Capital Cost	High (+30%)
АТВ	\$26.1 M	\$37.3 M	\$48.4 M
Clearwell Pond	\$3.5 M	\$5.0 M	\$6.5 M
Emergency Pond	\$3.5 M	\$5.0 M	\$6.5 M
Dead Storage Pond	\$4.2 M	\$6.0 M	\$7.8 M
Construction Runoff Pond	\$4.6 M	\$6.5 M	\$8.5 M

Table 1-1. Mill Creek Proposed Conceptual Cost Estimate









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Coal Combustion Residual Evaluation: Trimble County Generating Station

PREPARED FOR: Louisville Gas & Electric Company and Kentucky Utilities Company

PREPARED BY: CH2M HILL Engineers

DATE: September 29, 2015

1 Executive Summary

Louisville Gas & Electric Company and Kentucky Utilities Company (LG&E-KU) tasked CH2M HILL Engineers. (CH2M) with performing coal combustion residuals (CCR) evaluations for seven generation stations to develop conceptual CCR ash pond closure approaches and capital cost estimates. The generating stations under evaluation are Ghent, Trimble County, Mill Creek, E.W. Brown, Green River, Tyrone, and Pineville. This report applies solely to Trimble County Generating Station. The following scope activities were completed:

- Review of LG&E-KU provided historical CCR information and kickoff meeting workshop (June 2015)
- Developed a CCR pond closure compliance alternative that considers regulatory, civil, geotechnical, and stormwater aspects as it relates to CCR ash ponds and associated cost estimates for the generating station. Discussion of the conceptual approach is included in Section 2, and drawings are contained in Attachment 1. The applicable ponds at Trimble County are the Bottom Ash Pond (BAP) and Gypsum Storage Pond.
- Construct new concrete process tanks (four) for management of wastewater that can no longer be managed in the ponds that will be closed; construct dewatering facility for removing water from solids.

The estimated cost for closing the two ponds is summarized in Exhibit 1-1. Cost information is included in Attachment 2.

Proposed Conceptual Closure Approach	Low (-30%)	Total Capital Cost	High (+30%)
BAP Closure	\$76.1 M	\$108.7 M	\$141.3 M
Gypsum Storage Closure	\$23.3 M	\$33.3 M	\$43.3 M
Concrete Process Tanks and Dewatering Facility	\$75.1 M	\$107.2 M	\$139.4 M

This cost estimate should be considered a Feasibility or Study (Class 4) cost estimate. A summary breakdown for CAPEX costs for each station for the selected design basis are provide Attachments section. Class 4 estimates are generally prepared based on limited information, and subsequently have wide accuracy ranges. Typically, engineering is from 1 to 5 percent complete, and would comprise at a minimum the following: plant capacity, block schematics, layout, PFDs for main process systems and engineered process and utility equipment lists. The expected accuracy range for the estimates prepared for this study is +30 percent/-30 percent. A contingency of 30 percent has been included in the cost estimates as a provision for unforeseeable, additional costs within the general bounds of the project scope; particularly where experience has shown that unforeseeable costs are likely to occur.



