

**2016 ECR Plan Status Update Report
Quarterly Report – Update #39
July 30, 2026**

Executive Summary:

General

This report covers LG&E and KU's ("Companies") progress on the 2016 Environmental Cost Recovery ("ECR") Plan through the second quarter of 2026.

The overall 2016 ECR Plan safety performance through the second quarter of 2026 remained excellent, achieving a 2025 OSHA Recordable Incident Rate of 0.00 and an Inception-to-Date OSHA Recordable Incident Rate of 0.41, compared to the industry average of 2.4.

The total 2016 ECR Plan projected cost remained flat at \$1.0102 billion (net)¹, compared to the filed total of \$996.4 million as provided in Case Nos. 2016-00026, 2016-00027, and 2017-00483. Total spend-to-date through June 30, 2026 is \$993.4 million (net).

CCR Compliance (CCR Rule and State CCR Pond Closures)

Safety performance through the second quarter is excellent with a Year-to-Date OSHA Recordable Incident Rate of 0.00 and an Inception-to-Date OSHA Recordable Incident Rate of 0.44, compared to an industry average Recordable Incident Rate of 2.4.

The total projected cost for the Coal Combustion Residual ("CCR") Closure Program remained flat at \$980.0 million (net). Total spend-to-date through June 30, 2026 is \$963.3 million (net).

The remaining engineering activities primarily consist of supporting ongoing construction activities and updating design documents to reflect "as-built" conditions of the completed projects. Remaining activities are associated with awarded contracts through warranty periods.

As noted in previous correspondence, the Environmental Protection Agency ("EPA") finalized the Legacy CCR Surface Impoundment (Legacy) Rule, effective November 8, 2024. The Legacy Rule expanded the scope of the 2015 CCR Rule to add former generating sites and various types of new CCR units (legacy CCR surface impoundments and coal combustion residual management units ("CCRMUs")) to those governed by the Rule. The Legacy Rule also incorporated more aggressive interpretations into the regulatory process that have the potential to result in changes to regulatory compliance strategies among the industry.

¹ Co-Owners of the Trimble County plant: Illinois Municipal Electric Agency (IMEA) and Indiana Municipal Power Agency (IMPA) are responsible for 25%. IMEA owns 12.12% and IMPA owns 12.88%. Co-owner shares are not included in the costs provided in this report.

Recent EPA CCR Rule Initiatives

EPA Administrator Lee Zeldin has announced that EPA is planning to revisit many recent regulatory actions undertaken by the EPA, including potential changes to the CCR Rule. On February 10, 2026, EPA extended certain deadlines relating to specific CCR Management Units (CCRMUs). On April 9, 2026, EPA proposed to rescind all requirements under the CCR Legacy Rule for CCRMUs or as an alternative, to narrow the scope of and enhance compliance flexibility for those rule requirements. Additionally, EPA proposed further amendments to eliminate unnecessary beneficial use restrictions and to provide flexibilities to agencies with delegated CCR Rule authority relating to the issuance of individual site CCR permits.

EPA has finalized delegation of partial CCR program authority to North Dakota and Wyoming and proposed approval of similar programs for Virginia (May) and Louisiana (June). EPA continues to encourage states to seek delegated CCR program authority.

The U.S. Court of Appeals for the D.C. Circuit has extended voluntary stays of the legal challenges to the CCR Rule in accordance with an EPA request for long-term abeyance while the EPA considers various changes to the rule.

LG&E and KU continue to complete milestones required by currently applicable rules while also implementing their CCR Rule compliance strategies. Since additional changes are anticipated, LG&E and KU will continue to follow the developments regarding any new rulemaking and guidance actions issued by the EPA.

LG&E and KU CCR Rule Compliance Strategy and Updates

LG&E and KU completed in-place closure of the Companies' last CCR surface impoundment in April 2026. LG&E and KU continue to comply with CCR regulatory obligations and track potential changes to adjust strategies and assure continued compliance.

CCR Impoundment Closures

- Ghent – Phase III scope was completed in 2024. No further work is required.
- E.W. Brown – Dewatering continued through the second quarter of 2026. A new dewatering well and piezometer were installed to supplement the existing dewatering well system. Dewatering will continue until the design final water elevation is achieved. Redevelopment and rehabilitation of the wells will occur in the third quarter of 2026, which is expected to improve dewatering performance.
- Mill Creek – Project was completed in 2022. No further work is required.
- Trimble County –Vegetation establishment and maintenance on the Bottom Ash Pond (“BAP”) cap continued during the quarter. Mass fill placement in the Gypsum Storage Pond (“GSP”) was completed during the quarter.
- Tyrone – Project completed in the second quarter of 2020. No further work is required.

Process Water System Projects

- Trimble County – Project has been placed into Commercial Operation.
- Mill Creek – Project has been placed into Commercial Operation.
- Ghent – Project has been placed into Commercial Operation.
- E.W. Brown – Project has been placed into Commercial Operation.

Schedules

CCR Rule and State CCR Impoundment Closures

Project	Project #	EPC Status²	Planned / Actual In-Service Date³
E.W. Brown Aux Pond	KU Project 42	Completed	Closure Completed 4Q 2022 ⁴
E.W. Brown Main Ash Pond (Deleted Phase III of Landfill)	KU Project 36	Completed	Closure Completed 4Q 2020
Ghent ATB #1	KU Project 40	Completed	Cap and Closure Completed 4Q 2021
Ghent ATB #2	KU Project 40	Completed	Cap and Closure Completed 3Q 2024
Ghent Gypsum Stack	KU Project 40	Completed	Clean Closure Completed 3Q 2021
Green River Main Pond	KU Project 39	Completed	Cap and Closure Completed 2Q 2019
Green River ATB #2	KU Project 39	Completed	Cap and Closure Completed 3Q 2019
Green River SO2 Pond	KU Project 39	Completed	Clean Closure Completed 2Q 2019
Mill Creek Ash Pond	LG&E Project 29	Completed	Cap and Closure Completed 3Q 2021
Mill Creek Clearwell Pond	LG&E Project 29	Completed	Clean Closure Completed & New Pond in Service 4Q 2018
Mill Creek Construction Runoff Pond	LG&E Project 29	Completed	Clean Closure Completed 2Q 2018 and New Pond in Service 3Q 2018
Mill Creek Emergency Pond	LG&E Project 29	Completed	Clean Closure Completed and area structurally backfilled in 2017
Mill Creek Dead Storage Pond	LG&E Project 29	Completed	Clean Closure Completed and area structurally backfilled 3Q 2019
Pineville Ash Pond	KU Project 39	Completed	Cap and Closure Completed 3Q 2019
Trimble County Bottom Ash Pond	KU Project 41, LG&E Project 30	Awarded August 13, 2021	Cap and Closure Completed Q2 2026
Trimble County Gypsum Storage Pond	KU Project 41, LG&E Project 30	Awarded August 13, 2021	Clean Closure Completed Q2 2026
Tyrone Ash Pond	KU Project 39	Completed	Cap and Closure Completed 3Q 2019

² Engineering, Procurement, and Construction (“EPC”) Status – the red font signifies actuals.

³ The Planned In-Service Dates reflect the executed EPCs – the red font signifies actuals. Ghent ATB #2 and Trimble County BAP was changed to 2024 and 2025, respectively, to reflect a mid-point between the original rule and the proposed rule changes being litigated. Trimble County GSP completion date reflects completion of the work; however, the removal of CCR was completed in the 3Q 2024.

⁴ Project was placed into service during the 4Q 2022. Charges will continue to accrue into 2026 due to project close-out activities.

PWS Projects

<u>Project</u>	<u>Project #</u>	<u>EPC Status</u> ⁵	<u>Actual In Service Date</u>
E.W. Brown PWS	KU Project 42	Completed	Placed in Service May 2020
Ghent PWS	KU Project 40	Completed	Placed in Service April 2020
Mill Creek PWS	LG&E Project 29	Completed	Placed in Service October 2019
Trimble County PWS	KU Project 41, LG&E Project 30	Completed	Placed in Service October 2019

⁵ Engineering, Procurement, and Construction (“EPC”) Status – the red font signifies actuals.

E.W. Brown Landfill Phase II and Phase III

Work associated with this project has been completed; no further work is required.

Quarterly Status Update:

Federal CCR Rule Closure Projects:

KU Project 40 – Ghent (GH) Station CCR Rule Compliance Construction and New PWS

Work associated with this project has been completed; no further work is required.

KU Project 41 and LG&E Project 30⁶ – Trimble County (TC) Station CCR Rule Compliance Construction and New PWS

Trimble County – The companies continue to hold weekly and monthly project update meetings. Tetra Tech (“TT”) continued stormwater runoff management in the BAP and GSP, continued vegetation establishment on the BAP cap, and general maintenance of erosion and sediment controls in the BAP. TT completed mass fill placement in the GSP and began preparing the interior slopes of the GSP for placement of permanent rip rap slope protection.

⁶ KU and LG&E’s net costs are split 48% and 52%, respectively.



Trimble BAP – Looking Northeast – April 2026



Trimble BAP – Looking Northeast – July 2026



Trimble GSP – Looking South – April 2026



Trimble GSP – Looking South – July 2026

KU Project 42 – E.W. Brown (BR) Station CCR Rule Compliance Construction and New PWS

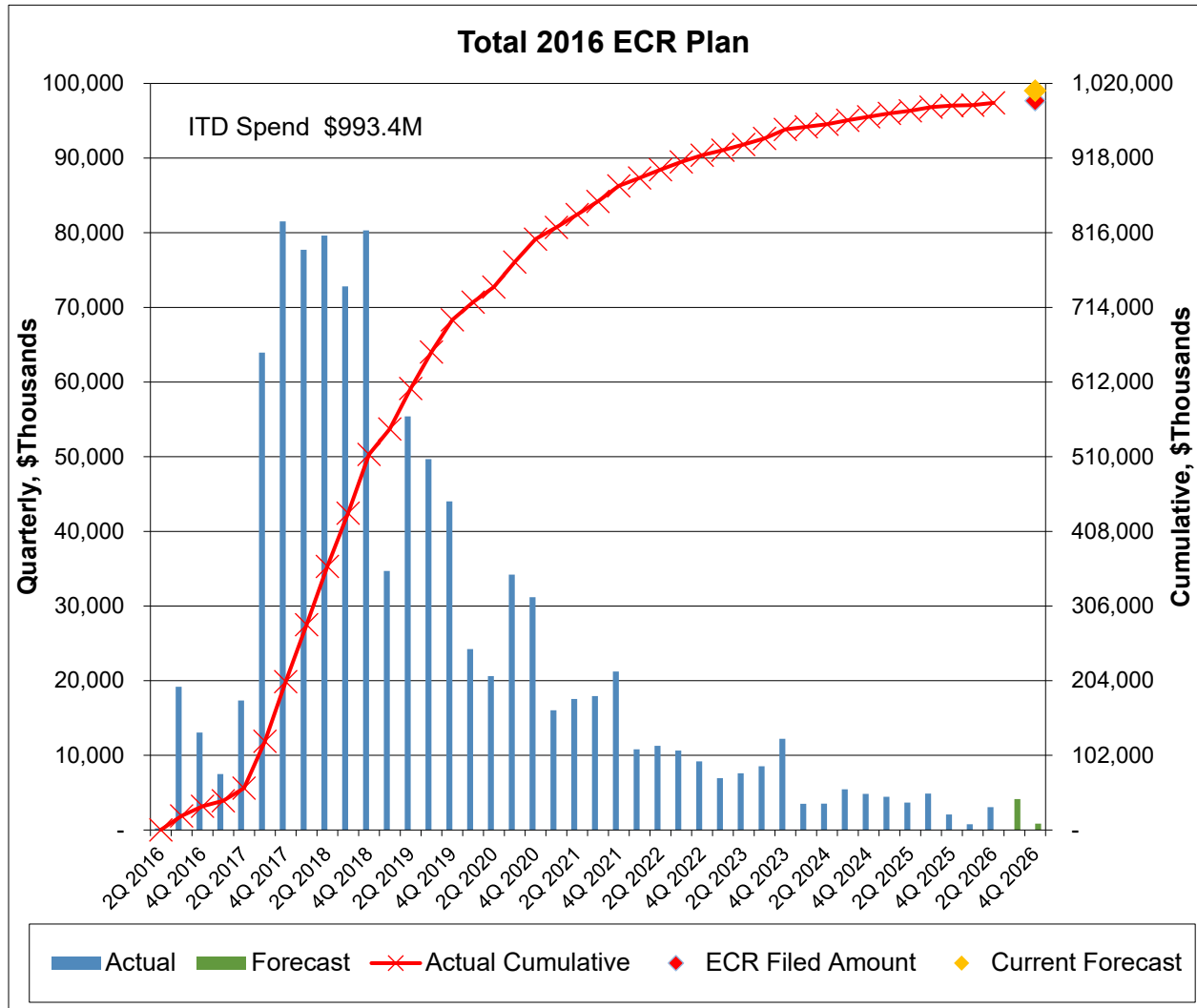
- Dewatering continued through the second quarter of 2006. A new dewatering well and piezometer were installed to supplement the existing dewatering well system. Dewatering will continue until the design final water elevation is achieved. Redevelopment and rehabilitation of the wells will occur in the third quarter of 2026, which is expected to improve dewatering performance.
WSP and GWTT (“Ground/Water Treatment and Technology, LLC”) continue to provide technical support and analysis of field data collected.

LG&E Project 29 – Mill Creek (MC) Station CCR Rule Compliance Construction and New PWS

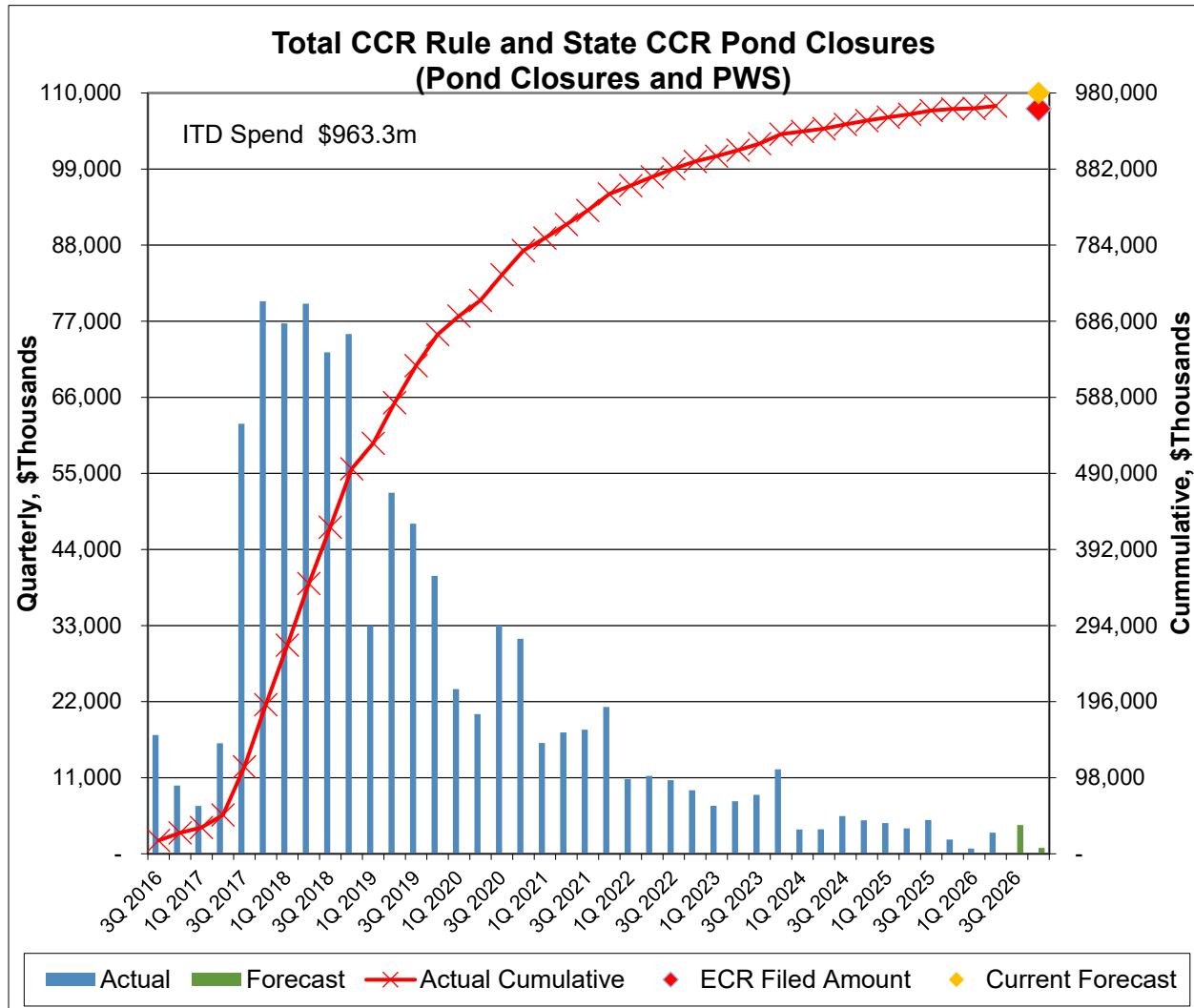
No further work is required.

Financials:

The total 2016 ECR Plan projected cost remained flat at \$1.0102 billion (net), compared to the filed total of \$996.4 million. Total spend-to-date through June 30, 2026 is \$993.4 million (net). The graph below includes 1) a symbol (◆) to show the current forecast to completion and (2) inception-to-date (“ITD”) Spend in the upper left of the chart.



The CCR Impoundment Closure total forecasted cost remained flat at \$980.0 million (net). Total spend-to-date through June 30, 2026 is \$963.3 million (net). The graph below includes 1) a symbol (◆) to show the current forecast to completion and (2) ITD Spend in the upper left of the chart.



Planned Activities for Next Quarter:

Federal CCR Rule Closure Projects

CCR Closures:

At Trimble County, TT will establish permanent vegetation and complete remaining punch list items in the BAP. TT will complete placement of permanent rip rap slope protection in the GSP, placement of seed and straw in the GSP, and work on punch list items related to the GSP.

At E.W. Brown, TT will continue dewatering and taking dewatering well elevation readings on a bi-weekly basis. Redevelopment and rehabilitation of the wells will occur, which is expected to improve dewatering performance.

PWS Projects:

Complete. No further work is required.