LOUISVILLE GAS AND ELECTRIC COMPANY

CASE NO. 2016-00371

Response to First Set of Data Requests of
Kentucky Industrial Utility Customers, Inc.
Dated January 11, 2017

Question No. 25

Responding Witness: Christopher M. Garrett

Q.1-25. For each taxing authority to which aggregate property tax payments exceeding $10,000 were made in 2016, please indicate whether there is a period of temporary abatement of taxes during the construction phase of assets to be placed in service. If so, please describe in detail.

A.1-25. There is no period of temporary abatement of taxes during the construction phase of assets to be placed in service. Items in CWIP have historically been subject to property tax.
Q.1-26. Please provide a schedule showing how property taxes were computed for the base year and include copies of all workpapers used to determine the amount in electronic format with all formulas intact.

A.1-26. See the attachment being provided in Excel format.
The attachment is being provided in a separate file in Excel format.
Q.1-27. Please provide a schedule showing how property taxes were computed for the test year and include copies of all workpapers used to determine the amount in electronic format with all formulas intact.

A.1-27. See the response to Question No. 26.
LOUISVILLE GAS AND ELECTRIC COMPANY

CASE NO. 2016-00371

Response to First Set of Data Requests of
Kentucky Industrial Utility Customers, Inc.
Dated January 11, 2017

Question No. 28

Responding Witness: Valerie L. Scott

Q.1-28. Please provide a schedule of the amortization expense associated with each regulatory asset for (a) each year 2012 through 2016, (b) the base year and (c) the test year. Provide the balance of each regulatory asset at the beginning and end of each of those years, the amortization period that was used in each of those years, and the FERC accounts utilized to record the amortization expense. In addition, please source the amortization period to the Case No. in which the Commission approved the recovery and the amortization period, if any.

A.1-28. See attached. Also see the response to PSC 1-8.
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### LOUISVILLE GAS AND ELECTRIC COMPANY
#### Case No. 2016-00371
#### Amortization of Regulatory Assets

**Attachment to Response to LGE KIUC-1 Question No. 28**

**Scott**

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<td>182342/182346</td>
<td>WINTER STORM 2009 - GAS</td>
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<tr>
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<td>MISO EXIT FEE</td>
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<tr>
<td>182322/182335</td>
<td>RATE CASE EXPENSES - ELECTRIC</td>
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<tr>
<td>182323/182336</td>
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<tr>
<td>182324/182337</td>
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<td>182332/182348</td>
<td>CARBON MANAGEMENT RESEARCH GROUP</td>
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<tr>
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<tr>
<td>182352</td>
<td>INTEREST RATE SWAPS (Mark to Market)</td>
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<tr>
<td>182359</td>
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<td>182360</td>
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<td>182361</td>
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<tr>
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<tr>
<td>182313</td>
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<td>AMS REGULATORY ASSET (a)</td>
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### LOUISVILLE GAS AND ELECTRIC COMPANY

**Amortization of Regulatory Assets**

**Attachment to Response to LGE KIUC-1 Question No. 28**

**Case No. 2016-00371**

**Forecast Base Period (3/16 - 2/17)**

<table>
<thead>
<tr>
<th>Account</th>
<th>Description</th>
<th>Beginning Balance</th>
<th>Annual Activity</th>
<th>Ending Balance</th>
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<tbody>
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<td>5,430,000</td>
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## Forecast Test Period (7/17 - 6/18)

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<tr>
<td>182361</td>
<td>2011 SUMMER STORM - ELECTRIC</td>
<td>805,000</td>
<td>(805,000)</td>
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<td>182364</td>
<td>FORWARD STARTING SWAP LOSSES</td>
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<td>182344</td>
<td>SWAP TERMINATION (Wachovia)</td>
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<td>6,541,000</td>
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<td>SWAP TERMINATION (Bank of America)</td>
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<td>Account Used for Amortization</td>
<td>Account Description</td>
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<td>Order No. / Docket No.</td>
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</table>

LG&E Regulatory Assets Total

- Business Plan assumed a regulatory asset would be recorded as retirements of meters occurred. Since then the Company determined it should establish a regulatory asset as retirements of meters occurred.
- ARO CCR detail is not available from the Business Plan in UI Planner - detail is combined in the ARO line item.
- These balances are a result of netting the regulatory asset and the regulatory liability in the forecast - the net balance was a regulatory liability.
## Amortization of Regulatory Assets

**Account Description**

<table>
<thead>
<tr>
<th>Description</th>
<th>Beginning Balance</th>
<th>Annual Activity</th>
<th>Amortization</th>
<th>Ending Balance</th>
</tr>
</thead>
<tbody>
<tr>
<td>182305/182315 ASC 715 - PENSION AND POSTRETIREMENT</td>
<td>225,305,162</td>
<td>31,200,453</td>
<td>(24,799,966)</td>
<td>231,705,649</td>
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<tr>
<td>182328-182331 ASC 740 - INCOME TAXES</td>
<td>14,730,134</td>
<td>118,389</td>
<td>(525,940)</td>
<td>14,322,583</td>
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<tr>
<td>182317-182318 ASSET RETIREMENT OBLIGATION - ELECTRIC</td>
<td>9,423,533</td>
<td>3,699,843</td>
<td>(113,009)</td>
<td>13,010,367</td>
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<tr>
<td>182326 ASSET RETIREMENT OBLIGATION - GAS</td>
<td>1,233,920</td>
<td>2,410,208</td>
<td>(1,646,097)</td>
<td>1,998,031</td>
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<tr>
<td>182327 ASSET RETIREMENT OBLIGATION - COMMON</td>
<td>9,107</td>
<td>8,585</td>
<td>(465)</td>
<td>17,227</td>
</tr>
<tr>
<td>182372-182373 ARO - GENERATION - COAL COMBUSTION RESIDUALS (b)</td>
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<td>-</td>
<td>-</td>
<td>-</td>
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<tr>
<td>182307 ENVIRONMENTAL COST RECOVERY</td>
<td>-</td>
<td>1,055,680</td>
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<td>631,535</td>
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<tr>
<td>182306 FUEL ADJUSTMENT CLAUSE</td>
<td>3,598,000</td>
<td>7,641,000</td>
<td>(5,171,000)</td>
<td>6,068,000</td>
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<td>182340 PERFORMANCE-BASED RATES</td>
<td>4,018,092</td>
<td>4,262,010</td>
<td>(2,640,217)</td>
<td>5,639,885</td>
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<tr>
<td>182308 GAS SUPPLY CLAUSE</td>
<td>1,683,380</td>
<td>7,546,298</td>
<td>(3,790,439)</td>
<td>5,439,239</td>
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<tr>
<td>182363 DSM COST RECOVERY - UNDER-RECOVERY</td>
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<td>1,538,143</td>
<td>(607,258)</td>
<td>930,885</td>
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<tr>
<td>182365 GAS LINE TRACKER</td>
<td>-</td>
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<td>-</td>
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</tr>
<tr>
<td>182370 OFF-SYSTEM TRACKER</td>
<td>-</td>
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**LG&E Regulatory Assets Total**

<p>| | | |</p>
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<tr>
<td></td>
<td>397,110,901</td>
<td>59,797,784</td>
</tr>
<tr>
<td></td>
<td>(48,446,460)</td>
<td>408,462,226</td>
</tr>
</tbody>
</table>

*a) Business Plan assumed a regulatory asset would be recorded as retirements of meters ocasset at the end of the meter replacement program. There is
b) ARO CCR detail is not available from the Business Plan in Ul Planner - detail is combine
* These balances are a result of netting the regulatory asset and the regulatory liability in t
<table>
<thead>
<tr>
<th>Account</th>
<th>Description</th>
<th>Beginning Balance</th>
<th>Annual Activity</th>
<th>Amortization</th>
<th>Ending Balance</th>
</tr>
</thead>
<tbody>
<tr>
<td>182305/182315</td>
<td>ASC 715 - PENSION AND POSTRETIREMENT</td>
<td>231,705,649</td>
<td>23,775,059</td>
<td>(91,392,827)</td>
<td>164,087,881</td>
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<tr>
<td>182328-182331</td>
<td>ASC 740 - INCOME TAXES</td>
<td>14,322,583</td>
<td>166,627</td>
<td>(431,860)</td>
<td>14,057,350</td>
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<tr>
<td>182317-1823</td>
<td>ASSET RETIREMENT OBLIGATION - ELECTRIC</td>
<td>13,010,367</td>
<td>6,705,785</td>
<td>(1,685,805)</td>
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<td>182326</td>
<td>ASSET RETIREMENT OBLIGATION - GAS</td>
<td>1,998,031</td>
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<td>ASSET RETIREMENT OBLIGATION - COMMON</td>
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<td>182372-182373</td>
<td>ARO - GENERATION - COAL COMBUSTION RESIDUALS (b)</td>
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<tr>
<td>182307</td>
<td>ENVIRONMENTAL COST RECOVERY</td>
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<td>FUEL ADJUSTMENT CLAUSE</td>
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<td>9,635,000</td>
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<td>PERFORMANCE-BASED RATES</td>
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<td>GAS SUPPLY CLAUSE</td>
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<td>7,491,371</td>
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<td>OFF-SYSTEM TRACKER</td>
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</table>

**LG&E Regulatory Assets Total**

|                         | 408,462,226 | 42,873,308 | (138,678,740) | 312,656,794 |

a) Business Plan assumed a regulatory asset would be recorded as retirements of meters occ
b) ARO CCR detail is not available from the Business Plan in UI Planner - detail is combin
* These balances are a result of netting the regulatory asset and the regulatory liability in t
### Account Description

#### 182305/182315 ASC 715 - PENSION AND POSTRETIREMENT

<table>
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<th>Annual Activity</th>
<th>Amortization</th>
<th>Ending Balance</th>
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#### 182328-182331 ASC 740 - INCOME TAXES

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<th>Ending Balance</th>
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#### 182317-182318 ASSET RETIREMENT OBLIGATION - ELECTRIC

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#### 182326 ASSET RETIREMENT OBLIGATION - GAS

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#### 182327 ASSET RETIREMENT OBLIGATION - COMMON

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#### 182372-182373 ARO - GENERATION - COAL COMBUSTION RESIDUALS (b)

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<th>Amortization</th>
<th>Ending Balance</th>
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<tbody>
<tr>
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#### 182307 ENVIRONMENTAL COST RECOVERY

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<th>Amortization</th>
<th>Ending Balance</th>
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#### 182306 FUEL ADJUSTMENT CLAUSE

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<th>Ending Balance</th>
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#### 182340 PERFORMANCE-BASED RATES

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<td>2,516,477</td>
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#### 182308 GAS SUPPLY CLAUSE

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<th>Annual Activity</th>
<th>Amortization</th>
<th>Ending Balance</th>
</tr>
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<tbody>
<tr>
<td>2014</td>
<td>7,359,645</td>
<td>25,465,387</td>
<td>(19,030,055)</td>
<td>13,794,977</td>
</tr>
</tbody>
</table>

#### 182363 DSM COST RECOVERY - UNDER-RECOVERY

<table>
<thead>
<tr>
<th>Description</th>
<th>Beginning Balance</th>
<th>Annual Activity</th>
<th>Amortization</th>
<th>Ending Balance</th>
</tr>
</thead>
<tbody>
<tr>
<td>2014</td>
<td>3,604,133</td>
<td>4,067,619</td>
<td>(7,671,752)</td>
<td>-</td>
</tr>
</tbody>
</table>

#### 182365 GAS LINE TRACKER

<table>
<thead>
<tr>
<th>Description</th>
<th>Beginning Balance</th>
<th>Annual Activity</th>
<th>Amortization</th>
<th>Ending Balance</th>
</tr>
</thead>
<tbody>
<tr>
<td>2014</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
</tbody>
</table>

#### 182370 OFF-SYSTEM TRACKER

<table>
<thead>
<tr>
<th>Description</th>
<th>Beginning Balance</th>
<th>Annual Activity</th>
<th>Amortization</th>
<th>Ending Balance</th>
</tr>
</thead>
<tbody>
<tr>
<td>2014</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
</tbody>
</table>

### LG&E Regulatory Assets Total

<table>
<thead>
<tr>
<th>Description</th>
<th>Beginning Balance</th>
<th>Annual Activity</th>
<th>Amortization</th>
<th>Ending Balance</th>
</tr>
</thead>
<tbody>
<tr>
<td>2014</td>
<td>312,656,794</td>
<td>161,348,991</td>
<td>(63,385,486)</td>
<td>410,620,299</td>
</tr>
</tbody>
</table>

---

*a) Business Plan assumed a regulatory asset would be recorded as retirements of meters occ
b) ARO CCR detail is not available from the Business Plan in UI Planner - detail is combine
* These balances are a result of netting the regulatory asset and the regulatory liability in t
### Amortization of Regulatory Assets

**Account Description**

| Account | Description |- | Description | Description | Description |
|---------|-------------|---|-------------|-------------|
| 182305/182315 | ASC 715 - PENSION AND POSTRETIREMENT | 214,538,462 | 31,966,740 | (37,548,834) | 208,956,368 |
| 182328-182331 | ASC 740 - INCOME TAXES | 13,792,117 | 14,319 | (279,552) | 13,526,884 |
| 182317-1823 | ASSET RETIREMENT OBLIGATION - ELECTRIC | 24,857,861 | 29,252,876 | (740,182) | 53,370,555 |
| 182326 | ASSET RETIREMENT OBLIGATION - GAS | 3,388,874 | 1,947,945 | (1,713,247) | 3,623,572 |
| 182327 | ASSET RETIREMENT OBLIGATION - COMMON | - | - | - | - |
| 182372-182373 | ARO - GENERATION - COAL COMBUSTION RESIDUALS (b) | - | - | - | - |
| 182307 | ENVIRONMENTAL COST RECOVERY | 3,840,000 | 10,486,000 | (1,020,000) | 13,306,000 |
| 182306 | FUEL ADJUSTMENT CLAUSE | 1,562,000 | 2,088,000 | (3,650,000) | - |
| 182340 | PERFORMANCE-BASED RATES | 1,711,218 | 1,218,784 | (1,500,798) | 1,429,204 |
| 182308 | GAS SUPPLY CLAUSE | 13,794,977 | 2,074,932 | (15,869,909) | - |
| 182363 | DSM COST RECOVERY - UNDER-RECOVERY | - | - | - | - |
| 182365 | GAS LINE TRACKER | - | 1,286,856 | - | 1,286,856 |
| 182370 | OFF-SYSTEM TRACKER | - | - | - | - |

**LG&E Regulatory Assets Total**

<table>
<thead>
<tr>
<th>Description</th>
<th>Description</th>
<th>Description</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>410,620,299</td>
<td>128,884,060</td>
<td>(105,091,261)</td>
<td>434,413,098</td>
</tr>
</tbody>
</table>

---

**Notes:**

- **a)** Business Plan assumed a regulatory asset would be recorded as retirements of meters occ
- **b)** ARO CCR detail is not available from the Business Plan in UI Planner - detail is combined
- **c)** These balances are a result of netting the regulatory asset and the regulatory liability in t
### LOUISVILLE GAS AND ELECTRIC COMPANY
Case No. 2016-00371
Amortization of Regulatory Assets

#### Attachment to Response to LGE KIUC-1 Question No. 28
6B of 16
Scott

#### Account Description

<table>
<thead>
<tr>
<th>Account</th>
<th>Description</th>
<th>Beginning Balance</th>
<th>Annual Activity</th>
<th>Amortization</th>
<th>Ending Balance</th>
</tr>
</thead>
<tbody>
<tr>
<td>182305/182315</td>
<td>ASC 715 - PENSION AND POSTRETIREMENT</td>
<td>208,956,368</td>
<td>(1,545,009)</td>
<td>3,550,620</td>
<td>210,961,979</td>
</tr>
<tr>
<td>182328-182331</td>
<td>ASC 740 - INCOME TAXES</td>
<td>13,526,884</td>
<td>1,023,098</td>
<td>(374,698)</td>
<td>14,175,284</td>
</tr>
<tr>
<td>182317-18/1823</td>
<td>ASSET RETIREMENT OBLIGATION - ELECTRIC</td>
<td>53,370,555</td>
<td>21,076,596</td>
<td>(38,578,975)</td>
<td>35,868,177</td>
</tr>
<tr>
<td>182326</td>
<td>ASSET RETIREMENT OBLIGATION - GAS</td>
<td>3,623,572</td>
<td>1,804,569</td>
<td>(2,054,147)</td>
<td>3,373,993</td>
</tr>
<tr>
<td>182327</td>
<td>ASSET RETIREMENT OBLIGATION - COMMON</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>182372-182373</td>
<td>ARO - GENERATION - COAL COMBUSTION RESIDUALS (b)</td>
<td>-</td>
<td>31,064,241</td>
<td>(95,997)</td>
<td>30,968,244</td>
</tr>
<tr>
<td>182307</td>
<td>ENVIRONMENTAL COST RECOVERY</td>
<td>13,306,000</td>
<td>6,865,000</td>
<td>(13,737,000)</td>
<td>6,434,000</td>
</tr>
<tr>
<td>182306</td>
<td>FUEL ADJUSTMENT CLAUSE</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>182340</td>
<td>PERFORMANCE-BASED RATES</td>
<td>1,429,204</td>
<td>107,000</td>
<td>(1,536,204)</td>
<td>-</td>
</tr>
<tr>
<td>182308</td>
<td>GAS SUPPLY CLAUSE</td>
<td>-</td>
<td>9,920,809</td>
<td>(7,104,687)</td>
<td>2,816,121</td>
</tr>
<tr>
<td>182363</td>
<td>DSM COST RECOVERY - UNDER-RECOVERY</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>182365</td>
<td>GAS LINE TRACKER</td>
<td>1,286,856</td>
<td>396,585</td>
<td>(1,683,441)</td>
<td>-</td>
</tr>
<tr>
<td>182370</td>
<td>OFF-SYSTEM TRACKER</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
</tbody>
</table>

### LG&E Regulatory Assets Total

<p>| | | | | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>434,413,098</td>
<td>73,089,675</td>
<td>(75,840,674)</td>
<td>431,662,099</td>
</tr>
</tbody>
</table>

a) Business Plan assumed a regulatory asset would be recorded as retirements of meters occ
b) ARO CCR detail is not available from the Business Plan in UI Planner - detail is comb in
* These balances are a result of netting the regulatory asset and the regulatory liability in t
## Amortization of Regulatory Assets

**Case No. 2016-00371**

**Attachment to Response to LGE KIUC-1 Question No. 28**

**Scott**

### Forecast Base Period (3/16 - 2/17)

<table>
<thead>
<tr>
<th>Account</th>
<th>Description</th>
<th>Beginning Balance</th>
<th>Annual Activity</th>
<th>Ending Balance</th>
</tr>
</thead>
<tbody>
<tr>
<td>182305/182315</td>
<td>ASC 715 - PENSION AND POSTRETIREMENT</td>
<td>208,707,000</td>
<td>56,174,000</td>
<td>264,881,000</td>
</tr>
<tr>
<td>182328-182331</td>
<td>ASC 740 - INCOME TAXES</td>
<td>22,393,000</td>
<td>(22,393,000)</td>
<td>-</td>
</tr>
<tr>
<td>182317-1823</td>
<td>ASSET RETIREMENT OBLIGATION - ELECTRIC</td>
<td>55,672,000</td>
<td>23,524,000</td>
<td>79,196,000</td>
</tr>
<tr>
<td>182326</td>
<td>ASSET RETIREMENT OBLIGATION - GAS</td>
<td>5,800,000</td>
<td>2,374,000</td>
<td>8,174,000</td>
</tr>
<tr>
<td>182327</td>
<td>ASSET RETIREMENT OBLIGATION - COMMON</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>182372-182373</td>
<td>ARO - GENERATION - COAL COMBUSTION RESIDUALS (b)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>182307</td>
<td>ENVIRONMENTAL COST RECOVERY</td>
<td>7,525,000</td>
<td>(2,096,836)</td>
<td>5,428,164</td>
</tr>
<tr>
<td>182306</td>
<td>FUEL ADJUSTMENT CLAUSE</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>182340</td>
<td>PERFORMANCE-BASED RATES</td>
<td>981,000</td>
<td>(981,000)</td>
<td>-</td>
</tr>
<tr>
<td>182308</td>
<td>GAS SUPPLY CLAUSE</td>
<td>(2,495,738)</td>
<td>3,574,212</td>
<td>1,078,474</td>
</tr>
<tr>
<td>182307</td>
<td>DSM COST RECOVERY - UNDER-RECOVERY</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>182356</td>
<td>GAS LINE TRACKER</td>
<td>1,464,570</td>
<td>(1,524,660)</td>
<td>(60,090)</td>
</tr>
<tr>
<td>182370</td>
<td>OFF-SYSTEM TRACKER</td>
<td>(114,000)</td>
<td>(120,000)</td>
<td>(234,000)</td>
</tr>
<tr>
<td><strong>LG&amp;E Regulatory Assets Total</strong></td>
<td>444,610,832</td>
<td>50,262,877</td>
<td>494,873,709</td>
<td></td>
</tr>
</tbody>
</table>

*a) Business Plan assumed a regulatory asset would be recorded as retirements of meters occ
b) ARO CCR detail is not available from the Business Plan in UI Planner - detail is combi
* These balances are a result of netting the regulatory asset and the regulatory liability in t
### Amortization of Regulatory Assets

#### Forecast Test Period (7/17 - 6/18)

<table>
<thead>
<tr>
<th>Account</th>
<th>Description</th>
<th>Beginning Balance</th>
<th>Annual Activity</th>
<th>Ending Balance</th>
</tr>
</thead>
<tbody>
<tr>
<td>182305/182315</td>
<td>ASC 715 - PENSION AND POSTRETIREMENT</td>
<td>240,642,000</td>
<td>(15,349,000)</td>
<td>225,293,000</td>
</tr>
<tr>
<td>182328-182331</td>
<td>ASC 740 - INCOME TAXES</td>
<td>21,613,000</td>
<td>(21,613,000)</td>
<td>-</td>
</tr>
<tr>
<td>182317-18233</td>
<td>ASSET RETIREMENT OBLIGATION - ELECTRIC</td>
<td>84,205,000</td>
<td>18,964,000</td>
<td>103,169,000</td>
</tr>
<tr>
<td>182326</td>
<td>ASSET RETIREMENT OBLIGATION - GAS</td>
<td>8,700,000</td>
<td>2,018,000</td>
<td>10,718,000</td>
</tr>
<tr>
<td>182327</td>
<td>ASSET RETIREMENT OBLIGATION - COMMON</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>182372-182373</td>
<td>ARO - GENERATION - COAL COMBUSTION RESIDUALS (b)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>182307</td>
<td>ENVIRONMENTAL COST RECOVERY</td>
<td>5,336,518</td>
<td>4,406,402</td>
<td>9,742,920</td>
</tr>
<tr>
<td>182306</td>
<td>FUEL ADJUSTMENT CLAUSE</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>182340</td>
<td>PERFORMANCE-BASED RATES</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>182308</td>
<td>GAS SUPPLY CLAUSE</td>
<td>718,983</td>
<td>(718,983)</td>
<td>-</td>
</tr>
<tr>
<td>182363</td>
<td>DSM COST RECOVERY - UNDER-RECOVERY</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>182365</td>
<td>GAS LINE TRACKER</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>182370</td>
<td>OFF-SYSTEM TRACKER</td>
<td>(70,000)</td>
<td>(39,000)</td>
<td>(109,000) *</td>
</tr>
</tbody>
</table>

**LG&E Regulatory Assets Total**

|                      | 498,144,501 | (14,106,320) | 484,038,081 |

- **a)** Business Plan assumed a regulatory asset would be recorded as retirements of meters occ
- **b)** ARO CCR detail is not available from the Business Plan in UI Planner - detail is combin
- *** These balances are a result of netting the regulatory asset and the regulatory liability in t
Q.1-29. Please provide the Company’s 2015, 2016, and 2017 pension and OPEB actuarial reports as well as the actuarial cost projections for the base year and the test year in a comparable format. Please identify all changes in assumptions, including mortality tables used in these actuarial reports compared to the actuarial reports relied on in the prior rate case.

A.1-29. The Company’s 2015 and 2016 pension actuarial reports and the actuarial cost projections for 2017 and 2018 which are included in the base year and the test year are provided in Attachment #1. The Company’s 2015 and 2016 OPEB actuarial reports and the actuarial cost projections for 2017 and 2018 which are included in the base year and the test year are provided in Attachment #2. The Company anticipates receiving the 2017 pension actuarial report in the second quarter of 2017.

All changes in significant assumptions, including mortality tables, used in these actuarial reports compared to the actuarial reports relied on in the prior rate case are summarized in Attachment #3.
April 15, 2015

Ms. Kelli Higdon
Senior Accounting Analyst
LG&E and KU Energy LLC
220 West Main Street
Louisville, KY 40202

Dear Kelli:

2015 ASC 715 ACCOUNTING RESULTS FOR QUALIFIED PENSION PLANS

LG&E and KU Energy LLC (“LKE” or “the Company”) engaged Towers Watson Delaware, Inc. (“Towers Watson”) to determine the Net Periodic Pension Cost/Income (“NPPC”) for its qualified pension plans, in accordance with FASB Accounting Standards Codification Topic 715 (“ASC 715”) for the fiscal year beginning January 1, 2015. The exhibits that follow provide results on a plan by plan basis, with allocations as requested by LKE.

The benefit obligations were measured as of LKE’s fiscal year begin date of January 1, 2015, and are based on January 1, 2015 census data collected from the plan administrator for the following valuations:

- LG&E and KU Retirement Plan
- Louisville Gas and Electric Company Bargaining Employees’ Retirement Plan

We have reviewed the census information for reasonableness and consistency, but have neither audited nor independently verified this information. Based on discussions with and concurrence by the plan sponsor, assumptions or estimates may have been made if data were not available. We are not aware of any errors or omissions in the data that would have a significant effect on the results of our calculations.

Reconciliation to May 30, 2014 Budget Projections

The preliminary 2015 consolidated U.S. GAAP NPPC for the three pension plans of $44.8 million compares to the projected 2015 consolidated expense of $49.1 million provided in our May 30, 2014 e-mail as follows:

<table>
<thead>
<tr>
<th>Description</th>
<th>Consolidated U.S. GAAP NPPC (in $millions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>2015 Projected NPPC provided on May 30, 2014</td>
<td>$49.1</td>
</tr>
<tr>
<td>Economic gains due to higher than expected 2014 asset returns and earlier than expected contribution timing during 2015</td>
<td>(6.4)</td>
</tr>
<tr>
<td>Reflection of updated data compared to roll-forward</td>
<td>(0.2)</td>
</tr>
<tr>
<td>Impact of assumption changes other than discount rate and mortality</td>
<td>(2.0)</td>
</tr>
<tr>
<td>Updated discount rate at December 31, 2014</td>
<td>4.7</td>
</tr>
<tr>
<td>Updated mortality assumption at December 31, 2014</td>
<td>(4.2)</td>
</tr>
<tr>
<td>Reflection of final plan changes, including early retirement factor improvements and Bargaining plan multiplier increase</td>
<td>3.8</td>
</tr>
<tr>
<td>2015 Preliminary NPPC</td>
<td>$44.8</td>
</tr>
</tbody>
</table>
Reconciliation to Actual 2014 Expense

The preliminary 2015 consolidated U.S. GAAP NPPC for the three pension plans of $44.8 million compares to the actual 2014 consolidated NPPC of $17.9 million as follows:

<table>
<thead>
<tr>
<th>Consolidated U.S. GAAP NPPC (in $millions)</th>
<th>2014 Actual U.S. GAAP NPPC</th>
<th>Economic gains due to higher than expected asset returns</th>
<th>(5.5)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>U.S. GAAP NPPC</td>
<td>Demographic gains due to updated data</td>
<td>(0.6)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Impact of assumption changes other than discount rate and mortality</td>
<td>(2.0)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Discount rate change</td>
<td>11.3</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Mortality assumption change</td>
<td>18.2</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Full effect of plan changes, including Early retirement factor improvements and Bargaining plan multiplier increase</td>
<td>5.5</td>
</tr>
<tr>
<td></td>
<td>2015 Preliminary U.S. GAAP NPPC</td>
<td></td>
<td>$44.8</td>
</tr>
</tbody>
</table>

Please note the following regarding these results:

1. As of January 1, 2015, LG&E and KU Energy LLC has selected the following economic assumptions:

   **Discount rate:**

<table>
<thead>
<tr>
<th>January 1, 2015</th>
</tr>
</thead>
<tbody>
<tr>
<td>LG&amp;E and KU Retirement Plan</td>
</tr>
<tr>
<td>Louisville Gas and Electric Company Bargaining Employees’ Retirement Plan</td>
</tr>
</tbody>
</table>

   All discount rates are based on the results of the Towers Watson BOND:Link model. At December 31, 2014, cash flows by plan were used to develop individual plan discount rates. Further information regarding the BOND:Link model parameters chosen by LKE can be found in our e-mail correspondence from January 7, 2015.

   **Rate of compensation increase:**

   The January 1, 2015 rate of compensation increase assumption for all LKE plans is a flat 3.50% at all ages. This amount decreased from the flat 4.00% assumption as of January 1, 2014 based on long-term expectations of salary increase rates for the covered plan populations.

   **Expected return on assets (EROA):**

<table>
<thead>
<tr>
<th>January 1, 2015</th>
</tr>
</thead>
<tbody>
<tr>
<td>LG&amp;E and KU Retirement Plan</td>
</tr>
<tr>
<td>Louisville Gas and Electric Company Bargaining Employees’ Retirement Plan</td>
</tr>
</tbody>
</table>
2. During 2014, LKE completed a demographic experience study to assess the appropriateness of the plans’ current demographic assumptions. Details regarding the results of the study can be found in our 2014 Experience Study and Demographic Assumptions Review presentation provided to PPL and LKE on November 12, 2014. As a result of that study, the following demographic assumptions were refined to better reflect anticipated future demographic experience. All remaining demographic assumptions remain consistent with those selected by LKE at January 1, 2014. Detailed descriptions of all demographic assumptions will be included in the actuarial valuation reports for the fiscal year ending December 31, 2015 (to be published during the coming months).

Retirement rates for active participants:

<table>
<thead>
<tr>
<th>Age</th>
<th>January 1, 2015</th>
<th>January 1, 2014</th>
</tr>
</thead>
<tbody>
<tr>
<td>55</td>
<td>3%</td>
<td>2%</td>
</tr>
<tr>
<td>56</td>
<td>3%</td>
<td>2%</td>
</tr>
<tr>
<td>57</td>
<td>4%</td>
<td>2%</td>
</tr>
<tr>
<td>58</td>
<td>5%</td>
<td>4%</td>
</tr>
<tr>
<td>59</td>
<td>10%</td>
<td>4%</td>
</tr>
<tr>
<td>60</td>
<td>20%</td>
<td>10%</td>
</tr>
<tr>
<td>61</td>
<td>20%</td>
<td>10%</td>
</tr>
<tr>
<td>62</td>
<td>35%</td>
<td>50%</td>
</tr>
<tr>
<td>63</td>
<td>25%</td>
<td>15%</td>
</tr>
<tr>
<td>64</td>
<td>25%</td>
<td>10%</td>
</tr>
<tr>
<td>65 - 67</td>
<td>50%</td>
<td>100%</td>
</tr>
<tr>
<td>68+</td>
<td>100%</td>
<td>100%</td>
</tr>
</tbody>
</table>

Retirement age for deferred vested participants:

<table>
<thead>
<tr>
<th></th>
<th>January 1, 2015</th>
<th>January 1, 2014</th>
</tr>
</thead>
<tbody>
<tr>
<td>LG&amp;E hired before 2003/2004</td>
<td>60</td>
<td>65</td>
</tr>
<tr>
<td>ERF improvement</td>
<td></td>
<td></td>
</tr>
<tr>
<td>LG&amp;E hired after 2003/2004</td>
<td>58</td>
<td>55</td>
</tr>
<tr>
<td>ERF improvement</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Termination:

For both the union and non-union populations, the termination assumption was updated to the SOA Hourly Union Termination Table.

Form of payment:

75% of future LG&E bargained and non-bargained retirees are now assumed to elect a 50% J&S form of payment and 25% are assumed to elect a single life annuity.
Mortality:

For the non-bargained plans, the mortality assumption was updated to reflect the RP-2014 gender specific healthy employee and healthy annuitant mortality tables with white collar adjustment (removing MP-2014 improvement projections from 2006-2014), increased by 2%, and applying Scale BB 2-Dimensional mortality improvements from 2006 on a generational basis.

For bargained plans, the mortality assumption was updated to reflect the RP-2014 gender specific healthy employee and healthy annuitant mortality tables with blue collar adjustment (removing MP-2014 improvement projections from 2006-2014), increased by 7%, and applying Scale BB 2-Dimensional mortality improvements from 2006 on a generational basis.

The disabled mortality assumption was updated to reflect the RP-2014 “Disabled Retirees” table (removing MP-2014 improvement projections from 2006-2014) and applying Scale BB 2-Dimensional mortality improvements from 2006 on a generational basis.

3. All plan provisions are the same as those valued at January 1, 2014, with the following exceptions:

| LG&E Bargaining Plan | • Early retirement factors improved by two years for participants who retire after attaining early retirement eligibility  
|                       | • Flat dollar pension multiplier improvement reflected in the 2014 Collective Bargaining Agreement between LG&E and IBEW Local 2100 |
| LG&E and KU Retirement Plan | Early retirement factors improved by two years for participants who retire after attaining early retirement eligibility |

Detailed descriptions of the plan provisions will be included in the actuarial valuation reports for the fiscal year ending December 31, 2015 (to be published during the coming months).

The retirement assumption was modified to reflect anticipated experience under the new plan provisions, the impact of which was included in the prior service cost bases established for the above changes in early retirement factors.

4. The following contributions made on January 14, 2015 for the LG&E and KU Retirement Plan and the Louisville Gas and Electric Company Bargaining Employees’ Retirement Plan, were reflected in the development of the expected return on plan assets:

<table>
<thead>
<tr>
<th>Contribution (in $millions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>LG&amp;E and KU Retirement Plan</td>
</tr>
<tr>
<td>LG&amp;E non-union</td>
</tr>
<tr>
<td>Louisville Gas and Electric Company Bargaining Employees’ Retirement Plan</td>
</tr>
</tbody>
</table>
Actuarial Certification

In preparing the results presented in this letter (including attached exhibits), we have relied upon information regarding plan provisions, participants, assets and sponsor accounting policies and methods provided by LKE and other persons or organizations designated by LKE. We have relied on all the data and information provided as complete and accurate. We have reviewed this information for overall reasonableness and consistency, but have neither audited nor independently verified this information. Based on discussions with and concurrence by the plan sponsor, assumptions or estimates may have been made if data were not available. We are not aware of any errors or omissions in the data that would have a significant effect on the results of our calculations. The results presented in this report are directly dependent upon the accuracy and completeness of the underlying data and information. Any material inaccuracy in the data, assets, plan provisions or other information provided to us may have produced results that are not suitable for the purposes of this report and such inaccuracies, as corrected by LKE, may produce materially different results that could require that a revised report be issued.

The measurement date is January 1, 2015. The benefit obligations were measured as of January 1, 2015 and are based on participant data as of the census date, January 1, 2015.

Information about the fair value of plan assets was furnished to us by BNY Mellon. LKE also provided information about the general ledger account balances for the pension plan costs at December 31, 2014, which reflect the expected funded status of the plans before adjustment to reflect the plans’ funded status based on the year-end measurements. Towers Watson used information supplied by LKE regarding amounts recognized in accumulated other comprehensive income as of December 31, 2014. This data was reviewed for reasonableness and consistency, but no audit was performed.

As required by U.S. GAAP, the actuarial assumptions and the accounting policies and methods employed in the development of the pension cost and other financial reporting have been selected by LKE. Towers Watson has concurred with these assumptions and methods. U.S. GAAP requires that each significant assumption “individually represent the best estimate of a particular future event.”

The results shown in this report have been developed based on actuarial assumptions that, to the extent evaluated by Towers Watson, we consider to be reasonable. Other actuarial assumptions could also be considered to be reasonable. Thus, reasonable results differing from those presented in this report could have been developed by selecting different reasonable assumptions.

The results shown in this report are estimates based on data that may be imperfect and on assumptions about future events that cannot be predicted with any certainty. The effects of certain plan provisions may be approximated, or determined to be insignificant and therefore not valued. Reasonable efforts were made in preparing this valuation to confirm that items that are significant in the context of the actuarial liabilities or costs are treated appropriately, and are not excluded or included inappropriately. The numbers shown in this report are not rounded, but this is for convenience and should not imply precision, which is not a characteristic of actuarial calculations.

If overall future plan experience produces higher benefit payments or lower investment returns than assumed, the relative level of plan costs reported in this valuation will likely increase in future valuations (and vice versa). Future actuarial measurements may differ significantly from the current measurements presented in this report due to many factors, including: plan experience differing from the anticipated by the economic or demographic assumptions, increases or decreases expected as part of the natural operation of the methodology used for the measurements (such as the end of an amortization period), and changes in plan provisions or applicable law.

The information contained in this report was prepared for the internal use of LKE and its auditors in connection with our actuarial valuations of the qualified pension plans. It is neither intended for and may not be used for other purposes, and we accept no responsibility or liability in this regard. LKE may distribute this actuarial valuation report to the appropriate authorities who have the legal right to require
LKE to provide them this report, in which case LKE will use best efforts to notify Towers Watson in advance of this distribution. Further distribution to, or use by, other parties of all or part of this document is expressly prohibited without Towers Watson’s prior written consent. Towers Watson accepts no responsibility for any consequences arising from any other party relying on this report or any advice relating to its contents.

The undersigned consulting actuaries are members of the Society of Actuaries and meet the “Qualification Standards for Actuaries Issuing Statements of Actuarial Opinion in the United States” relating to pension plans. Our objectivity is not impaired by any relationship between the plan sponsor and our employer, Towers Watson Delaware Inc.

* * * * * *

Please do not hesitate to call if you have any questions.

Sincerely,

Jennifer A. Della Pietra, ASA, EA
Senior Consulting Actuary
Direct Dial: 215-246-6861

Royce S. Kosoff, FSA, EA, CFA
Senior Consulting Actuary
Direct Dial: 215-246-6815

William R. Loth, FSA, EA
Consulting Actuary
Direct Dial: 215-246-6647

cc: George Sunder – PPL Corporation
    Dan Arbough – LG&E and KU Energy LLC
    Jeanne Kugler – LG&E and KU Energy LLC
    Karla Durn – PPL Corporation
    Kristin May, FSA, EA – Towers Watson
LG&E and KU Energy LLC ("LKE")
2015 Net Periodic Pension Cost
Qualified Pension Plans

<table>
<thead>
<tr>
<th>Funded Status</th>
<th>LG&amp;E Union</th>
<th>LG&amp;E</th>
<th>ServCo</th>
</tr>
</thead>
<tbody>
<tr>
<td>ABO</td>
<td>331,649,737</td>
<td>216,073,596</td>
<td></td>
</tr>
<tr>
<td>PBO</td>
<td>331,649,737</td>
<td>243,058,032</td>
<td></td>
</tr>
<tr>
<td>Fair value of assets</td>
<td>300,546,993</td>
<td>213,348,099</td>
<td></td>
</tr>
<tr>
<td>Funded status</td>
<td>(31,102,744)</td>
<td>(29,709,933)</td>
<td></td>
</tr>
</tbody>
</table>

**Amounts recognized in accumulated other comprehensive income consist of:**

<table>
<thead>
<tr>
<th></th>
<th>LG&amp;E Union</th>
<th>LG&amp;E</th>
<th>ServCo</th>
</tr>
</thead>
<tbody>
<tr>
<td>Net actuarial loss/(gain)</td>
<td>99,269,492</td>
<td>76,347,804</td>
<td></td>
</tr>
<tr>
<td>Prior service cost/(credit)</td>
<td>22,160,037</td>
<td>5,262,940</td>
<td></td>
</tr>
<tr>
<td>Transition obligation/(asset)</td>
<td>-</td>
<td>-</td>
<td></td>
</tr>
<tr>
<td>Total</td>
<td>121,429,529</td>
<td>81,610,744</td>
<td></td>
</tr>
</tbody>
</table>

**Market related value of assets**

<table>
<thead>
<tr>
<th></th>
<th>LG&amp;E Union</th>
<th>LG&amp;E</th>
<th>ServCo</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>285,369,049</td>
<td>204,154,232</td>
<td></td>
</tr>
</tbody>
</table>

**2015 Net Periodic Pension Cost**

<table>
<thead>
<tr>
<th></th>
<th>LG&amp;E Union</th>
<th>LG&amp;E</th>
<th>ServCo</th>
</tr>
</thead>
<tbody>
<tr>
<td>Service cost</td>
<td>1,431,466</td>
<td>2,167,471</td>
<td></td>
</tr>
<tr>
<td>Interest cost</td>
<td>13,618,634</td>
<td>10,142,890</td>
<td></td>
</tr>
<tr>
<td>Expected return on assets</td>
<td>(20,362,203)</td>
<td>(14,423,958)</td>
<td></td>
</tr>
<tr>
<td>Amortization of:</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Transition obligation (asset)</td>
<td>-</td>
<td>-</td>
<td></td>
</tr>
<tr>
<td>Prior service cost (credit)</td>
<td>3,166,370</td>
<td>1,824,525</td>
<td></td>
</tr>
<tr>
<td>Actuarial (gain) loss</td>
<td>11,451,092</td>
<td>8,224,043</td>
<td></td>
</tr>
<tr>
<td>Net periodic pension cost</td>
<td>9,305,359</td>
<td>7,934,971</td>
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</table>

**Key assumptions:**

<table>
<thead>
<tr>
<th></th>
<th>LG&amp;E Union</th>
<th>LG&amp;E</th>
<th>ServCo</th>
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</thead>
<tbody>
<tr>
<td>Discount rate</td>
<td>4.20%</td>
<td>4.27%</td>
<td></td>
</tr>
<tr>
<td>Expected return on plan assets</td>
<td>7.00%</td>
<td>7.00%</td>
<td></td>
</tr>
<tr>
<td>Rate of compensation increase</td>
<td>N/A</td>
<td>3.50%</td>
<td></td>
</tr>
</tbody>
</table>

The results contained in this document are based on the data provided by LKE's outside administrator as of January 1, 2015. All other assumptions, methods, and plan provisions are the same as those used for the year-end 2014 financial statement disclosures provided on January 20, 2015. The descriptions of the assumptions, methods, plan provisions, and limitations as set forth in the year-end 2014 financial statement disclosure letter should be considered part of these results.

4/15/2015
LG&E and KU Energy LLC ("LKE")

2015 Net Periodic Pension Cost Reflecting 15-year (Gain)/Loss Amortization Method
Qualified Pension Plans

Funded Status

<table>
<thead>
<tr>
<th>Funded Status</th>
<th>LG&amp;E Union</th>
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<td>243,058,032</td>
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<td></td>
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<td>Fair value of assets</td>
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<td>213,348,099</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Funded status</td>
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Amounts recognized in accumulated other comprehensive income consist of:

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Market related value of assets

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<th>Market related value of assets</th>
<th>LG&amp;E Union</th>
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<td></td>
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</table>

2015 Net Periodic Pension Cost

<table>
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<td></td>
</tr>
<tr>
<td>Interest cost</td>
<td>13,618,634</td>
<td>10,142,890</td>
<td>21,704,049</td>
</tr>
<tr>
<td>Expected return on assets</td>
<td>(20,362,203)</td>
<td>(14,423,958)</td>
<td>(26,386,798)</td>
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<tr>
<td>Amortization of:</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Transition obligation (asset)</td>
<td>-</td>
<td>-</td>
<td></td>
</tr>
<tr>
<td>Prior service cost (credit)</td>
<td>3,166,370</td>
<td>1,824,525</td>
<td>3,520,645</td>
</tr>
<tr>
<td>Actuarial (gain) loss</td>
<td>8,244,110</td>
<td>6,016,150</td>
<td>8,633,975</td>
</tr>
<tr>
<td>Net periodic pension cost</td>
<td>6,098,377</td>
<td>5,727,078</td>
<td>21,239,310</td>
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</tbody>
</table>

Gain/Loss Amortization Detail

<table>
<thead>
<tr>
<th>Item</th>
<th>LG&amp;E Union</th>
<th>LG&amp;E</th>
<th>ServCo</th>
</tr>
</thead>
<tbody>
<tr>
<td>Net actuarial loss/(gain) at 1/1/2015</td>
<td>99,269,492</td>
<td>76,347,804</td>
<td>130,306,103</td>
</tr>
<tr>
<td>6 months of amortization using &quot;Double Corridor&quot; method</td>
<td>5,725,546</td>
<td>4,112,022</td>
<td>5,515,907</td>
</tr>
<tr>
<td>Net actuarial loss/(gain) at 7/1/2015</td>
<td>93,543,946</td>
<td>72,235,782</td>
<td>124,790,596</td>
</tr>
<tr>
<td>6 months of amortization using 15-year &quot;Vintage&quot; method</td>
<td>2,518,564</td>
<td>1,824,525</td>
<td>3,118,468</td>
</tr>
</tbody>
</table>

Key assumptions:

<table>
<thead>
<tr>
<th>Item</th>
<th>LG&amp;E Union</th>
<th>LG&amp;E</th>
<th>ServCo</th>
</tr>
</thead>
<tbody>
<tr>
<td>Discount rate</td>
<td>4.20%</td>
<td>4.27%</td>
<td>4.27%</td>
</tr>
<tr>
<td>Rate of compensation increase</td>
<td>N/A</td>
<td>3.50%</td>
<td></td>
</tr>
</tbody>
</table>

The results contained in this document are based on the data provided by LKE's outside administrator as of January 1, 2015. All other assumptions, methods, and plan provisions are the same as those used for the year-end 2014 financial statement disclosures provided on January 20, 2015, with the exception of the gain/loss amortization method, which is based on the double corridor method for the first half of the year and based on a 15-year amortization of the 7/1/2015 unrecognized loss/(gain) with a single 10% corridor for the second half of the year. Per discussions with LKE, the plans were not remeasured as of 7/1/2015. The descriptions of the assumptions, methods, plan provisions, and limitations as set forth in the year-end 2014 financial statement disclosure letter should be considered part of these results.
May 2, 2016

Ms. Jeanne Kugler  
Manager, Risk Management  
LG&E and KU Energy LLC  
220 West Main Street  
Louisville, KY  40202

Dear Jeanne:

**2016 ASC 715 ACCOUNTING RESULTS FOR QUALIFIED PENSION PLANS**

LG&E and KU Energy LLC (“LKE” or “the Company”) engaged Towers Watson Delaware, Inc. (“Willis Towers Watson”) to determine the Net Periodic Pension Cost/Income (“NPPC”) for its qualified pension plans, in accordance with FASB Accounting Standards Codification Topic 715 (“ASC 715”) for the fiscal year beginning January 1, 2016. The exhibits that follow provide results on a plan by plan basis, with allocations as requested by LKE.

The benefit obligations were measured as of LKE’s fiscal year begin date of January 1, 2016, and are based on January 1, 2016 census data collected from the plan administrator for the following valuations:

- LG&E and KU Retirement Plan
- Louisville Gas and Electric Company Bargaining Employees’ Retirement Plan

We have reviewed the census information for reasonableness and consistency, but have neither audited nor independently verified this information. Based on discussions with and concurrence by the plan sponsor, assumptions or estimates may have been made if data were not available. We are not aware of any errors or omissions in the data that would have a significant effect on the results of our calculations.

**Reconciliation to September 2, 2015 Budget Projections (Reflecting 15-year Amortization Method)**

The preliminary 2016 NPPC for the two pension plans of $26.3 million based on the Regulatory 15-year amortization method compares to the projected 2016 expense of $26.8 million based on the Regulatory 15-year amortization method provided in our September 2, 2015 e-mail as follows:

<table>
<thead>
<tr>
<th>Description</th>
<th>Consolidated NPPC (in $millions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>2016 Projected NPPC provided on September 2, 2015</td>
<td>$26.8</td>
</tr>
<tr>
<td>Actual 2015 return (vs. expected return in budget), 7.00% expected return on assets assumption (compared to 6.75% in budget), and actual contribution timing</td>
<td>(5.8)</td>
</tr>
<tr>
<td>Reflection of updated data compared to roll-forward</td>
<td>(0.5)</td>
</tr>
<tr>
<td>Updated discount rate at December 31, 2015</td>
<td>(0.9)</td>
</tr>
<tr>
<td>Reflection of December 31, 2015 lump sum mortality assumption (budget reflected preliminary assumption set prior to November meeting with LKE/PPL)</td>
<td>6.7</td>
</tr>
<tr>
<td>2016 Preliminary NPPC</td>
<td>$26.3</td>
</tr>
</tbody>
</table>

* Excludes WKE Non-Union results
Reconciliation to Actual 2015 Expense (Reflecting 15-year Amortization Method)

The preliminary 2016 NPPC for the two pension plans of $26.3 million based on the Regulatory 15-year amortization method compares to the actual 2015 expense of $44.5 million based on the Regulatory 15-year amortization method as follows:

| Economic gains due to contributions, offset by lower and deferred asset losses | (3.5) |
| Reflection of updated data compared to roll-forward | (0.7) |
| Updated discount rate at December 31, 2015 | (4.3) |
| Impact of lump sum plan change measured at December 31, 2015, offset by expiration of several prior service cost bases | 1.1 |
| Reflection of full year of 15-year (gain)/loss amortization (vs. 2015 use of 6 months of “Double Corridor”) | (10.8) |

2016 Preliminary NPPC $26.3

* Excludes WKE Non-Union results

Please note the following regarding these results:

1. As of January 1, 2016, LG&E and KU Energy LLC has selected the following economic assumptions:

   Discount rate:

   | LG&E and KU Retirement Plan | 4.58% |
   | Louisville Gas and Electric Company Bargaining Employees’ Retirement Plan | 4.49% |

   All discount rates are based on the results of the Towers Watson BOND:Link model. At December 31, 2015, cash flows by plan were used to develop individual plan discount rates. Further information regarding the BOND:Link model parameters chosen by LKE can be found in our e-mail correspondence from January 8, 2016.

   Rate of compensation increase:

   The January 1, 2016 rate of compensation increase assumption for all LKE plans is a flat 3.50% at all ages.

   Expected return on assets (EROA):

   | LG&E and KU Retirement Plan | 7.00% |
   | Louisville Gas and Electric Company Bargaining Employees’ Retirement Plan | 7.00% |

2. All plan provisions are the same as those valued at January 1, 2015, with the exception of the lump sum option effective January 1, 2016 for the LG&E Bargaining Plan and the LG&E and KU Retirement Plan.

   The percentage of retiring and terminating participants assumed to take a lump sum is 50%. 
Lump sum benefits are valued reflecting the discount rate employed for accounting purposes and unisex RP-2014 healthy annuitant mortality table (e.g., 50/50 blend of gender specific tables), without collar adjustment (removing MP-2014 improvement projections from 2006-2014) and applying Scale BB 2-Dimensional mortality improvements form 2006 on a generational basis.

Detailed descriptions of the plan provisions will be included in the actuarial valuation reports for the fiscal year ending December 31, 2016 (to be published during the coming months).


<table>
<thead>
<tr>
<th>Contribution (in $millions)</th>
<th>LG&amp;E and KU Retirement Plan</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>LG&amp;E non-union $4.7</td>
</tr>
<tr>
<td></td>
<td>ServCo $9.5</td>
</tr>
<tr>
<td></td>
<td>KU $9.1</td>
</tr>
<tr>
<td></td>
<td>WKE non-union $0.0</td>
</tr>
<tr>
<td></td>
<td>Louisville Gas and Electric Company Bargaining Employees’ Retirement Plan $6.7</td>
</tr>
</tbody>
</table>

**Actuarial Certification**

In preparing the results presented in this letter (including attached exhibits), we have relied upon information regarding plan provisions, participants, assets and sponsor accounting policies and methods provided by LKE and other persons or organizations designated by LKE. We have relied on all the data and information provided as complete and accurate. We have reviewed this information for overall reasonableness and consistency, but have neither audited nor independently verified this information. Based on discussions with and concurrence by the plan sponsor, assumptions or estimates may have been made if data were not available. We are not aware of any errors or omissions in the data that would have a significant effect on the results of our calculations. The results presented in this report are directly dependent upon the accuracy and completeness of the underlying data and information. Any material inaccuracy in the data, assets, plan provisions or other information provided to us may have produced results that are not suitable for the purposes of this report and such inaccuracies, as corrected by LKE, may produce materially different results that could require that a revised report be issued.

The measurement date is January 1, 2016. The benefit obligations were measured as of January 1, 2016 and are based on participant data as of the census date, January 1, 2016.

Information about the fair value of plan assets was furnished to us by BNY Mellon. LKE also provided information about the general ledger account balances for the pension plan costs at December 31, 2015, which reflect the expected funded status of the plans before adjustment to reflect the plans’ funded status based on the year-end measurements. Willis Towers Watson used information supplied by LKE regarding amounts recognized in accumulated other comprehensive income as of December 31, 2015. This data was reviewed for reasonableness and consistency, but no audit was performed.

As required by U.S. GAAP, the actuarial assumptions and the accounting policies and methods employed in the development of the pension cost and other financial reporting have been selected by LKE. Willis Towers Watson has concurred with these assumptions and methods. U.S. GAAP requires that each significant assumption “individually represent the best estimate of a particular future event.”
The results shown in this report have been developed based on actuarial assumptions that, to the extent evaluated by Willis Towers Watson, we consider to be reasonable. Other actuarial assumptions could also be considered to be reasonable. Thus, reasonable results differing from those presented in this report could have been developed by selecting different reasonable assumptions.

The results shown in this report are estimates based on data that may be imperfect and on assumptions about future events that cannot be predicted with any certainty. The effects of certain plan provisions may be approximated, or determined to be insignificant and therefore not valued. Reasonable efforts were made in preparing this valuation to confirm that items that are significant in the context of the actuarial liabilities or costs are treated appropriately, and are not excluded or included inappropriately. The numbers shown in this report are not rounded, but this is for convenience and should not imply precision, which is not a characteristic of actuarial calculations.

If overall future plan experience produces higher benefit payments or lower investment returns than assumed, the relative level of plan costs reported in this valuation will likely increase in future valuations (and vice versa). Future actuarial measurements may differ significantly from the current measurements presented in this report due to many factors, including: plan experience differing from the anticipated by the economic or demographic assumptions, increases or decreases expected as part of the natural operation of the methodology used for the measurements (such as the end of an amortization period), and changes in plan provisions or applicable law.

The information contained in this report was prepared for the internal use of LKE and its auditors in connection with our actuarial valuations of the qualified pension plans. It is neither intended for and may not be used for other purposes, and we accept no responsibility or liability in this regard. LKE may distribute this actuarial valuation report to the appropriate authorities who have the legal right to require LKE to provide them this report, in which case LKE will use best efforts to notify Willis Towers Watson in advance of this distribution. Further distribution to, or use by, other parties of all or part of this document is expressly prohibited without Willis Towers Watson’s prior written consent. Willis Towers Watson accepts no responsibility for any consequences arising from any other party relying on this report or any advice relating to its contents.

The undersigned consulting actuaries are members of the Society of Actuaries and meet the “Qualification Standards for Actuaries Issuing Statements of Actuarial Opinion in the United States” relating to pension plans. Our objectivity is not impaired by any relationship between the plan sponsor and our employer, Towers Watson Delaware Inc.
Please do not hesitate to call if you have any questions.

Sincerely,

Jennifer A. Della Pietra, ASA, EA
Senior Consulting Actuary
Direct Dial: 215-246-6861

Royce S. Kosoff, FSA, EA, CFA
Senior Consulting Actuary
Direct Dial: 215-246-6815

cc:  Dan Arbough – LG&E and KU Energy LLC
     Jeanne Kugler – LG&E and KU Energy LLC
     David Ark - LG&E and KU Energy LLC
     George Sunder – PPL Corporation
     Julissa Burgos – PPL Corporation
     Kristin May, FSA, EA – Willis Towers Watson
     Brad Dreisbach, ASA – Willis Towers Watson

http://natct.internal.towerswatson.com/clients/604575/2016LKEProjects/Documents/FASB ASC 715 Results - LKE Qualified Pension Plans 2016.doc
## 2016 Net Periodic Pension Cost

### LG&E and KU Energy LLC ("LKE")

#### Qualified Pension Plans

<table>
<thead>
<tr>
<th>Funded Status</th>
<th>LG&amp;E Union</th>
<th>LG&amp;E</th>
<th>ServCo</th>
<th>Non-Union</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>ABO</strong></td>
<td>327,133,148</td>
<td>217,345,411</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>PBO</strong></td>
<td>327,133,148</td>
<td>241,563,544</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Fair value of assets</strong></td>
<td>296,699,656</td>
<td>208,140,470</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Funded status</strong></td>
<td>(30,433,492)</td>
<td>(33,423,074)</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Amounts recognized in accumulated other comprehensive income consist of:**

- **Net actuarial loss/(gain)**
  - LG&E Union: 95,546,633
  - LG&E: 78,351,268
- **Prior service cost/(credit)**
  - LG&E Union: 29,308,285
  - LG&E: 6,837,647
- **Transition obligation/(asset)**
  - LG&E Union: -
  - LG&E: -

**Total**: 124,854,918

**Market related value of assets**: 302,645,498

### 2016 Net Periodic Pension Cost

- **Service cost**: 1,165,140
- **Interest cost**: 14,152,287
- **Expected return on assets**: 
  - LG&E Union: (20,800,325)
  - LG&E: (14,702,169)
- **Amortization of**: 
  - **Transition obligation (asset)**
    - LG&E Union: -
    - LG&E: -
  - **Prior service cost (credit)**
    - LG&E Union: 4,471,357
    - LG&E: 1,697,500
  - **Actuarial (gain) loss**
    - LG&E Union: 6,840,372
    - LG&E: 5,783,202

**Net periodic pension cost**: 5,828,831

**Key assumptions**:

- **Discount rate**: 4.49%
- **Expected return on plan assets**: 7.00%
- **Rate of compensation increase**: N/A

The results contained in this document are based on the data provided by LKE's outside administrator as of January 1, 2016. All other assumptions, methods, and plan provisions are the same as those used for the year-end 2015 financial statement disclosures provided on January 22, 2016. The descriptions of the assumptions, methods, plan provisions, and limitations as set forth in the year-end 2015 financial statement disclosure letter should be considered part of these results.
LG&E and KU Energy LLC ("LKE")
2016 Net Periodic Pension Cost Reflecting 15-year (Gain)/Loss Amortization Method
Qualified Pension Plans

<table>
<thead>
<tr>
<th>Funded Status</th>
<th>Reg-15</th>
<th>Reg-15</th>
<th>Reg-15</th>
<th>Reg-15</th>
<th>Fin-15</th>
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</thead>
<tbody>
<tr>
<td>ABO</td>
<td>327,133,148</td>
<td>217,345,411</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>PBO</td>
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<td>241,563,544</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Fair value of assets</td>
<td>296,699,656</td>
<td>208,140,470</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Funded status</td>
<td>(30,433,492)</td>
<td>(33,423,074)</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Amounts recognized in accumulated other comprehensive income consist of:

- Net actuarial loss/(gain) 98,753,615  80,559,160  121,630,799  110,646,369  46,718,484
- Prior service cost/(credit) 29,308,285  6,837,647  3,916,894  20,123,450  13,668,252
- Transition obligation/(asset) - - - - -
- Total 128,061,900  87,396,807  125,547,693  130,769,819  60,386,736

Market related value of assets 302,645,498  213,332,310

2016 Net Periodic Pension Cost

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Service cost</td>
<td>1,165,140</td>
<td>1,839,898</td>
<td>12,213,263</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Interest cost</td>
<td>14,152,287</td>
<td>10,705,521</td>
<td>22,600,171</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Expected return on assets</td>
<td>(20,800,325)</td>
<td>(14,702,169)</td>
<td>(27,615,212)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Amortization of:</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Transition obligation (asset)</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td></td>
</tr>
<tr>
<td>Prior service cost (credit)</td>
<td>4,471,357</td>
<td>1,697,500</td>
<td>4,068,717</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Actuarial (gain) loss</td>
<td>4,174,202</td>
<td>3,541,006</td>
<td>3,765,140</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Net periodic pension cost</td>
<td>3,162,661</td>
<td>3,081,756</td>
<td>15,032,079</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Key assumptions:

- Discount rate 4.49% 4.58% 4.58%
- Expected return on plan assets 7.00% 7.00% 7.00%
- Rate of compensation increase N/A 3.50% 3.50%

The results contained in this document are based on the data provided by LKE's outside administrator as of January 1, 2016. All other assumptions, methods, and plan provisions are the same as those used for the year-end 2015 financial statement disclosures provided on January 22, 2016. The descriptions of the assumptions, methods, plan provisions, and limitations as set forth in the year-end 2015 financial statement disclosure letter should be considered part of these results.
June 3, 2016

Ms. Jeanne Kugler
Manager, Risk Management
LG&E and KU Energy LLC
220 West Main Street
Louisville, KY  40202

Dear Jeanne:

2017-2021 PROJECTIONS OF PENSION AND POSTRETIREMENT WELFARE PLANS

Towers Watson Delaware, Inc. ("Willis Towers Watson") was engaged by LG&E and KU Energy LLC ("LKE" or "the Company") to provide 5-year projections of the Financial Accounting Standards Codification ("ASC") Topic 715 accounting cost for the following pension plans with allocations as requested by LKE:

- LG&E and KU Retirement Plan
- Louisville Gas and Electric Company Bargaining Employees' Retirement Plan

The exhibits for the years 2017-2021 are as follows:

- Estimated ASC 715 accounting cost
- Estimated cash contributions to the pension plan trusts for the LG&E and KU Retirement Plan and the Louisville Gas and Electric Company Bargaining Employees' Retirement Plan

The projections are based on the 2016 actuarial valuation results provided to you on May 2 (qualified pension plans). Except where otherwise noted, the assumptions, methods, data, and plan provisions used to develop these projections are the same as those used to develop the 2016 actuarial valuation results.

In addition, Willis Towers Watson was also engaged to provide 5-year projections of the PPA Funding Minimum Required Contribution for both pension plans. The exhibit for 2016-2021 shows the following:

- Estimated Minimum Required Contribution under ERISA/PPA
- Estimated Funding Balance used to supplement the expected cash contributions as determined by the ASC 715 projections under the "double corridor" method
- Estimated Funded Status both before and after adjustment for Funding Balances
The projections are based on the preliminary 2016 funding results to be published during the coming months. Except where otherwise noted, the assumptions, methods, data, and plan provisions used to develop these projections are the same as those used to develop the 2016 actuarial valuation results.

Reconciliation to September 2, 2015 Budget Projections (Reflecting 15-year Amortization Method)

The projected 2017 consolidated NPPC for the two pension plans of $29.2 million compares to the projected 2017 consolidated expense of $27.1 million based on the Regulatory 15-year amortization method provided in our September 2, 2015 e-mail as follows:

<table>
<thead>
<tr>
<th></th>
<th>Consolidated NPPC (in $millions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>2017 Projected NPPC provided on September 2, 2016</td>
<td>$27.1</td>
</tr>
<tr>
<td>Actual 2015 return (vs. expected return in budget), 7.00% expected return on assets assumption (compared to 6.75% in budget)</td>
<td>(4.9)</td>
</tr>
<tr>
<td>Reflection of updated data compared to roll-forward</td>
<td>(0.5)</td>
</tr>
<tr>
<td>Updated discount rate</td>
<td>1.3</td>
</tr>
<tr>
<td>Change in service cost growth assumption</td>
<td>(0.5)</td>
</tr>
<tr>
<td>Reflection of December 31, 2015 lump sum mortality assumption (budget reflected preliminary assumption set prior to November meeting with LKE/PPL)</td>
<td>6.7</td>
</tr>
<tr>
<td>2017 Budget Estimate</td>
<td>$29.2</td>
</tr>
</tbody>
</table>

* Excludes WKE Non-Union results

Results of Funding Projections 2016-2021

Current funding policy of contributing an amount equal to U.S. GAAP NPPC, plus use of credit balance, is expected to be sufficient throughout the projection period for both qualified plans.

- Estimated Minimum Required Contributions in all years exceed estimated cash contributions for the LG&E and KU Retirement Plan. For the Bargaining Plan, estimated cash contributions exceed the Minimum Required Contribution for all years.

- Additional funding strategies, for example, voluntary forfeiture of Funding Balances as of January 1, 2016 to avoid funding shortfall entirely, were outside the scope of these projections. We anticipate discussing this in greater detail in July.
These projections reflect the following key economic assumptions:

Discount rate:

<table>
<thead>
<tr>
<th>Plan</th>
<th>December 31, 2016 and all subsequent years</th>
<th>December 31, 2015</th>
</tr>
</thead>
<tbody>
<tr>
<td>LG&amp;E and KU Retirement Plan</td>
<td>4.42%</td>
<td>4.58%</td>
</tr>
<tr>
<td>Louisville Gas and Electric Company</td>
<td>4.34%</td>
<td>4.49%</td>
</tr>
<tr>
<td>Bargaining Employees’ Retirement Plan</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

December 31, 2015 discount rates are based on the results of the Willis Towers Watson BOND:Link model as of December 31, 2015. Annuity cash flows by plan are based on the results of the 2015 actuarial valuation results.

December 31, 2016 and all subsequent years discount rates were developed based on April 30, 2016 BOND:Link results plus 25 basis points.

Rate of compensation increase:

The projected rates of compensation increase for all legacy LKE plans are flat at all ages.

<table>
<thead>
<tr>
<th>Plan</th>
<th>December 31, 2016 and all subsequent years</th>
<th>December 31, 2015</th>
</tr>
</thead>
<tbody>
<tr>
<td>All legacy LKE plans</td>
<td>3.50%</td>
<td>3.50%</td>
</tr>
</tbody>
</table>

Expected return on assets (EROA):

<table>
<thead>
<tr>
<th>Plan</th>
<th>December 31, 2016 and all subsequent years</th>
<th>December 31, 2015</th>
</tr>
</thead>
<tbody>
<tr>
<td>LG&amp;E and KU Retirement Plan</td>
<td>7.00%</td>
<td>7.00%</td>
</tr>
<tr>
<td>Louisville Gas and Electric Company</td>
<td>7.00%</td>
<td>7.00%</td>
</tr>
<tr>
<td>Bargaining Employees’ Retirement Plan</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Service cost growth:

The service cost for the qualified pension plans is assumed to remain constant for future years.

<table>
<thead>
<tr>
<th>Plan</th>
<th>All projection years</th>
</tr>
</thead>
<tbody>
<tr>
<td>LG&amp;E and KU Retirement Plan</td>
<td>0.00%</td>
</tr>
<tr>
<td>Louisville Gas and Electric Company</td>
<td>0.00%</td>
</tr>
<tr>
<td>Bargaining Employees’ Retirement Plan</td>
<td>0.00%</td>
</tr>
</tbody>
</table>
Actual return on assets:

<table>
<thead>
<tr>
<th>Pension Plan</th>
<th>2016 and all subsequent years</th>
</tr>
</thead>
<tbody>
<tr>
<td>LG&amp;E and KU Retirement Plan</td>
<td>7.00%</td>
</tr>
<tr>
<td>Louisville Gas and Electric Company Bargaining Employees’ Retirement Plan</td>
<td>7.00%</td>
</tr>
</tbody>
</table>

Demographic assumptions:

1. All demographic assumptions are the same as those selected by LKE at December 31, 2015.

A summary of all other assumptions can be found in the Financial Disclosure letter provided to LKE on January 20, 2016. Detailed descriptions of these assumptions will be included in the actuarial valuation reports for the fiscal year ending December 31, 2016 (to be published during the coming months).

2. All plan provisions are the same as those valued at January 1, 2016 with the exception of the dollar per month multiplier for the Louisville Gas and Electric Company Bargaining Employees’ Retirement Plan, which is assumed to increase 3% per year throughout the projection.

Detailed descriptions of the plan provisions will be included in the actuarial valuation reports for the fiscal year ending December 31, 2016 (to be published during the coming months).

3. For the Louisville Gas and Electric Company Bargaining Employees’ Retirement Plan, the increases in benefit multipliers are assumed to be collectively bargained and reflected every three years. The increase in Prior Service Cost for the increase in the benefit multipliers for 2018-2020 is assumed to be reflected at December 31, 2017 and the increase for 2021-2023 is assumed to be reflected at December 31, 2020. For funding purposes, one-year increases are reflected annually.

4. The expected future service to retirement age used in the development of the unrecognized (gain) / loss amortization for the two pension plans is equal to the amount developed in the January 1, 2016 actuarial valuation results and is assumed to decrease 0.5 per year for the pension plans to reflect...
the aging of the closed populations.

5. For funding purposes, all contributions to the two pension plans are assumed to be made on January 15 of the year shown and are reflected as a receivable contribution for the prior plan year. For accounting purposes, all pension contributions are assumed to be made at the end of the year shown.

6. Administrative expenses of the qualified pension plans were assumed to remain level with 2016 during the projection period and are allocated based on actual administrative expenses in 2015.

Actuarial certification

In preparing the calculations contained in this letter, Willis Towers Watson has used information and data provided to us by LKE and other persons or organizations designated by LKE. We have relied on all the data and information provided, including plan provisions and asset information, as being complete and accurate. We have reviewed this information for overall reasonableness and consistency but have neither audited nor independently verified this information.

As required by ASC 715, the actuarial assumptions and methods employed in the development of the pension and postretirement plan obligations have been selected by the plan sponsor. Willis Towers Watson has concurred with these assumptions and methods. ASC 715 requires that each significant assumption "individually represent the best estimate of a particular future event."

For funding purposes, the plan sponsor selected, as prescribed by regulation, key assumptions and funding methods (including asset valuation method and choice among prescribed interest rates) employed in the development of the contribution. To the extent not prescribed by ERISA, the Internal Revenue Code and regulatory guidance from the Treasury and the IRS, or selected by the sponsor, the actuarial assumptions and methods employed in the development of the contribution amounts have been selected by Willis Towers Watson, with the concurrence of the plan sponsor. It is beyond the scope of this forecast to analyze the reasonableness and appropriateness of prescribed methods and assumptions, or to analyze other sponsor elections from among the alternatives available for prescribed methods and assumptions.

The results documented in this letter are estimates based on data that may be imperfect and on assumptions about future events that cannot be predicted with any certainty. Certain plan provisions may be approximated or determined to be immaterial and therefore not valued. Assumptions may be made about participant data or other factors. We have made reasonable efforts to ensure that items that are material in the context of the actuarial liabilities or costs are treated appropriately, and not excluded or included inappropriately.

Actual future experience will differ from the assumptions used in our calculations. As these differences arise, contributions or the cost for accounting purposes will be adjusted in future valuations to take changes into account. If these adjustments become material, they may result in future adjustments to the valuation model.

The results shown in this letter have been developed based on actuarial assumptions that, to the extent evaluated or selected by Willis Towers Watson, we consider to be reasonable. Other actuarial assumptions could also be considered to be reasonable. Thus, reasonable results differing from those presented in this report could have been developed by selecting different reasonable assumptions.
The numbers in this letter are not rounded, but this is for convenience only and should not imply precision, which is not a characteristic of actuarial calculations.

The calculations provided in this letter have been prepared solely for the benefit of LKE for budgeting purposes. This letter should not be used for other purposes, and we accept no responsibility for any such use. It should not be relied upon by, or shared with, any third parties without Willis Towers Watson’s prior written consent.

This letter is provided subject to the terms set out herein and in our engagement letter dated March 28, 2013 and any accompanying or referenced terms and conditions.

This letter provides actuarial calculations. It does not constitute legal, accounting, tax or investment advice. We encourage you to consult with qualified advisors with respect to those matters.

The undersigned consulting actuaries are members of the Society of Actuaries and other professional actuarial organizations and meet the “Qualification Standards for Actuaries Issuing Statements of Actuarial Opinion in the United States” relating to retirement plans. Our objectivity is not impaired by any relationship between the plan sponsor and our employer, Willis Towers Watson.

*          *          *          *           *

Please do not hesitate to call if you have any questions.

Sincerely,

Royce S. Kosoff, FSA, EA, CFA
Senior Consulting Actuary
Direct Dial: 215-246-6815

Jennifer A. Della Pietra, ASA, EA
Senior Consulting Actuary
Direct Dial: 215-246-6861

cc: David Crosby – LG&E and KU Energy LLC
    Dan Arbough – LG&E and KU Energy LLC
    George Sunder – PPL Corporation
    Julissa Burgos – PPL Corporation
    Brad Dreisbach – Willis Towers Watson

## LG&E & KU Energy LLC

**Estimated ASC 715 Net Periodic Pension Cost ("NPPC") For Qualified Pension Plans**

### 2017 Fiscal Year

<table>
<thead>
<tr>
<th>Regulatory</th>
<th>LG&amp;E and KU Retirement Plan</th>
<th>LG&amp;E Union</th>
<th>Servco</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Service cost</strong></td>
<td>2,213,200</td>
<td>1,401,836</td>
<td>14,293,601</td>
</tr>
<tr>
<td><strong>Interest cost</strong></td>
<td>9,703,879</td>
<td>12,506,524</td>
<td>21,550,246</td>
</tr>
<tr>
<td><strong>Expected return on assets</strong></td>
<td>(14,526,869)</td>
<td>(20,417,041)</td>
<td>(27,362,375)</td>
</tr>
<tr>
<td><strong>Amortizations:</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Transition</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Prior service cost</td>
<td>1,564,417</td>
<td>4,471,357</td>
<td>3,960,771</td>
</tr>
<tr>
<td>(Gain)/loss</td>
<td>10,418,050</td>
<td>12,149,737</td>
<td>13,651,338</td>
</tr>
<tr>
<td><strong>ASC 715 NPBC</strong></td>
<td>9,372,677</td>
<td>10,112,413</td>
<td>26,093,581</td>
</tr>
</tbody>
</table>

### 2018 Fiscal Year

<table>
<thead>
<tr>
<th>Regulatory</th>
<th>LG&amp;E and KU Retirement Plan</th>
<th>LG&amp;E Union</th>
<th>Servco</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Service cost</strong></td>
<td>2,213,200</td>
<td>1,401,836</td>
<td>14,293,601</td>
</tr>
<tr>
<td><strong>Interest cost</strong></td>
<td>9,524,874</td>
<td>12,500,873</td>
<td>21,740,794</td>
</tr>
<tr>
<td><strong>Expected return on assets</strong></td>
<td>(14,937,988)</td>
<td>(20,635,008)</td>
<td>(28,163,857)</td>
</tr>
<tr>
<td><strong>Amortizations:</strong></td>
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<td></td>
<td></td>
</tr>
<tr>
<td>Transition</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Prior service cost</td>
<td>1,334,204</td>
<td>6,050,811</td>
<td>3,459,919</td>
</tr>
<tr>
<td>(Gain)/loss</td>
<td>8,961,742</td>
<td>10,162,085</td>
<td>12,945,610</td>
</tr>
<tr>
<td><strong>ASC 715 NPBC</strong></td>
<td>7,096,032</td>
<td>9,480,597</td>
<td>24,276,067</td>
</tr>
</tbody>
</table>

### Notes

1. These accounting projections are based on the January 1, 2016 valuation results provided on May 2, 2016. The description of the data, assumptions, methods, plan provisions, and limitations as set forth in the accounting valuation results cover letter should be considered part of these results. Please see the attached letter for a description of all other assumptions and methods used in this analysis.

2. Discount rate is assumed to be 3.78% for the Non-Union plan and 3.69% for the Union plan, which reflects an 80 basis points decrease from the December 31, 2015 discount rate for both plans for measurement date December 31, 2016 and beyond. The decrease in discount rate reflects the market conditions from December 31, 2015 to June 30, 2016.

3. The fair value of assets is assumed to earn 7.00% in all years.

4. Service cost is assumed to remain constant (0.00% growth).

5. Expected future service is assumed to decrease 0.5 per year for both qualified plans.
LG&E & KU Energy LLC
Estimated ASC 715 Net Periodic Pension Cost ("NPPC") For Qualified Pension Plans
2019 Fiscal Year

<table>
<thead>
<tr>
<th>Regulatory</th>
<th>Regulatory</th>
<th>Regulatory</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>LG&amp;E &amp; KU Retirement Plan</td>
<td></td>
</tr>
<tr>
<td>Service cost</td>
<td>2,213,200</td>
<td>1,401,836</td>
</tr>
<tr>
<td>Interest cost</td>
<td>9,322,048</td>
<td>12,067,498</td>
</tr>
<tr>
<td>Expected return on assets</td>
<td>(15,196,238)</td>
<td>(20,832,663)</td>
</tr>
<tr>
<td>Amortizations:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Transition</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Prior service cost</td>
<td>409,879</td>
<td>5,887,146</td>
</tr>
<tr>
<td>(Gain)/loss</td>
<td>7,716,345</td>
<td>9,530,971</td>
</tr>
<tr>
<td>ASC 715 NPBC</td>
<td>4,465,234</td>
<td>8,054,788</td>
</tr>
</tbody>
</table>

Notes

1. These accounting projections are based on the January 1, 2016 valuation results provided on May 2, 2016. The description of the data, assumptions, methods, plan provisions, and limitations as set forth in the accounting valuation results cover letter should be considered part of these results. Please see the attached letter for a description of all other assumptions and methods used in this analysis.
2. Discount rate is assumed to be 3.78% for the Non-Union plan and 3.69% for the Union plan, which reflects an 80 basis points decrease from the December 31, 2015 discount rate for both plans for measurement date December 31, 2016 and beyond. The decrease in discount rate reflects the market conditions from December 31, 2015 to June 30, 2016.
3. The fair value of assets is assumed to earn 7.00% in all years.
4. Service cost is assumed to remain constant (0.00% growth).
5. Expected future service is assumed to decrease 0.5 per year for both qualified plans.

2019 Fiscal Year

```
Estimated ASC 715 Net Periodic Pension Cost ("NPPC") For Qualified Pension Plans
LG&E & KU Energy LLC
```

2020 Fiscal Year

```
```

Notes

```
1. These accounting projections are based on the January 1, 2016 valuation results provided on May 2, 2016. The description of the data, assumptions, methods, plan provisions, and limitations as set forth in the accounting valuation results cover letter should be considered part of these results. Please see the attached letter for a description of all other assumptions and methods used in this analysis.
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3. The fair value of assets is assumed to earn 7.00% in all years.
4. Service cost is assumed to remain constant (0.00% growth).
5. Expected future service is assumed to decrease 0.5 per year for both qualified plans.

```
7/14/2016
```
Notes

1. These accounting projections are based on the January 1, 2016 valuation results provided on May 2, 2016. The description of the data, assumptions, methods, plan provisions, and limitations as set forth in the accounting valuation results cover letter should be considered part of these results. Please see the attached letter for a description of all other assumptions and methods used in this analysis.
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3. The fair value of assets is assumed to earn 7.00% in all years.
4. Service cost is assumed to remain constant (0.00% growth).
5. Expected future service is assumed to decrease 0.5 per year for both qualified plans.

LG&E & KU Energy LLC

Estimated Cash Contributions for Plan Years 2016-2021 ($ millions)

<table>
<thead>
<tr>
<th></th>
<th>LG&amp;E and KU Retirement Plan</th>
<th>LG&amp;E Union</th>
</tr>
</thead>
<tbody>
<tr>
<td>1/15/2016 actual</td>
<td>4,700,000</td>
<td>6,700,000</td>
</tr>
<tr>
<td>1/15/2017</td>
<td>9,372,677</td>
<td>10,112,413</td>
</tr>
<tr>
<td>1/15/2018</td>
<td>7,096,032</td>
<td>9,480,597</td>
</tr>
<tr>
<td>1/15/2019</td>
<td>4,465,234</td>
<td>8,054,788</td>
</tr>
<tr>
<td>1/15/2020</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1/15/2021</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
### LG&E & KU Energy LLC

**Estimated Net Periodic Pension Cost ("NPPC") Reflecting 15-year (Gain)/Loss Amortization Method For Qualified Pension Plans**

**2017 Fiscal Year**

<table>
<thead>
<tr>
<th>Reg-15</th>
<th>Reg-15</th>
<th>Reg-15</th>
<th>Reg-15</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>LG&amp;E and KU Retirement Plan</strong></td>
<td><strong>LG&amp;E and KU Retirement Plan</strong></td>
<td><strong>LG&amp;E and KU Retirement Plan</strong></td>
<td><strong>LG&amp;E and KU Retirement Plan</strong></td>
</tr>
<tr>
<td><strong>Non-union</strong></td>
<td><strong>Servco (Regulatory)</strong></td>
<td><strong>LG&amp;E Union</strong></td>
<td><strong>LG&amp;E Union</strong></td>
</tr>
<tr>
<td>Service cost</td>
<td>2,213,200</td>
<td>14,293,601</td>
<td>1,401,836</td>
</tr>
<tr>
<td>Interest cost</td>
<td>9,703,879</td>
<td>21,550,246</td>
<td>12,506,524</td>
</tr>
<tr>
<td>Expected return on assets</td>
<td>(14,526,869)</td>
<td>(27,362,375)</td>
<td>(20,417,041)</td>
</tr>
<tr>
<td>Amortizations:</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Transition</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Prior service cost</td>
<td>1,564,417</td>
<td>3,960,771</td>
<td>4,471,357</td>
</tr>
<tr>
<td>(Gain)/loss</td>
<td>5,244,493</td>
<td>8,153,955</td>
<td>6,347,677</td>
</tr>
<tr>
<td>ASC 715 NPBC</td>
<td>4,199,120</td>
<td>20,596,198</td>
<td>4,310,353</td>
</tr>
</tbody>
</table>

### Notes

1. These accounting projections are based on the 15-year amortization method valuation results provided on May 2, 2016. The description of the data, assumptions, methods, plan provisions, and limitations as set forth in the accounting valuation results cover letter should be considered part of these results. Please see the attached letter for a description of all other assumptions and methods used in this analysis.
2. Discount rate is assumed to be 3.78% for the Non-Union plan and 3.69% for the Union plan, which reflects an 80 basis points decrease from the December 31, 2015 discount rate for both plans for measurement date December 31, 2016 and beyond. The decrease in discount rate reflects the market conditions from December 31, 2015 to June 30, 2016.
3. The fair value of assets is assumed to earn 7.00% in all years.
4. Service cost is assumed to remain constant (0.00% growth).
5. Expected future service is assumed to decrease 0.5 per year for both qualified plans.
6. Projections reflect the 15-year amortization method as outlined in the April 20, 2015 rate settlement agreement and as confirmed on June 17, 2015 by LKE.
### Notes

1. These accounting projections are based on the 15-year amortization method valuation results provided on May 2, 2016. The description of the data, assumptions, methods, plan provisions, and limitations as set forth in the accounting valuation results cover letter should be considered part of these results. Please see the attached letter for a description of all other assumptions and methods used in this analysis.

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3. The fair value of assets is assumed to earn 7.00% in all years.

4. Service cost is assumed to remain constant (0.00% growth).

5. Expected future service is assumed to decrease 0.5 per year for both qualified plans.

6. Projections reflect the 15-year amortization method as outlined in the April 20, 2015 rate settlement agreement and as confirmed on June 17, 2015 by LKE.
<table>
<thead>
<tr>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. These accounting projections are based on the 15-year amortization method valuation results provided on May 2, 2016. The description of the data, assumptions, methods, plan provisions, and limitations as set forth in the accounting valuation results cover letter should be considered part of these results. Please see the attached letter for a description of all other assumptions and methods used in this analysis.</td>
</tr>
<tr>
<td>2. Discount rate is assumed to be 3.78% for the Non-Union plan and 3.69% for the Union plan, which reflects an 80 basis points decrease from the December 31, 2015 discount rate for both plans for measurement date December 31, 2016 and beyond. The decrease in discount rate reflects the market conditions from December 31, 2015 to June 30, 2016.</td>
</tr>
<tr>
<td>3. The fair value of assets is assumed to earn 7.00% in all years.</td>
</tr>
<tr>
<td>4. Service cost is assumed to remain constant (0.00% growth).</td>
</tr>
<tr>
<td>5. Expected future service is assumed to decrease 0.5 per year for both qualified plans.</td>
</tr>
<tr>
<td>6. Projections reflect the 15-year amortization method as outlined in the April 20, 2015 rate settlement agreement and as confirmed on June 17, 2015 by LKE.</td>
</tr>
</tbody>
</table>
June 3, 2016

Ms. Jeanne Kugler
Manager, Risk Management
LG&E and KU Energy LLC
220 West Main Street
Louisville, KY 40202

Dear Jeanne:

2017-2021 PROJECTIONS POSTRETIREMENT WELFARE PLANS

Towers Watson Delaware, Inc. (“Willis Towers Watson”) was engaged by LG&E and KU Energy LLC (“LKE” or “the Company”) to provide 5-year projections of the Financial Accounting Standards Codification (“ASC”) Topic 715 accounting cost for the following pension and postretirement welfare plans with allocations as requested by LKE:

- LG&E and KU Postretirement Benefit Plan

The exhibits for the years 2017-2021 are as follows:

- Estimated ASC 715 accounting cost
- Expected cash flows for the LG&E and KU Postretirement Benefit Plan
- Expected employer contributions to the 401(h) account of the LG&E and KU Postretirement Benefit Plan

The projections are based on the 2016 actuarial valuation results provided to you on May 6 (LG&E and KU Postretirement Benefit Plan). Except where otherwise noted, the assumptions, methods, data, and plan provisions used to develop these projections are the same as those used to develop the 2016 actuarial valuation results.
Except where otherwise noted, the assumptions, methods, data, and plan provisions used to develop these projections are the same as those used to develop the 2016 actuarial valuation results.

Reconciliation to September 2, 2015 Budget Projections

The projected 2017 consolidated U.S. GAAP NPBC for the postretirement benefit plan is $7.5 million compared to the projected 2017 consolidated NPBC of $8.5 million provided in our June 15, 2015 e-mail. The decrease of $1.0 million is primarily due to demographic gains resulting from the reflection of valuation data as of 1/1/2016 and updated per capita claim cost assumptions, including aging table, for the 2016 valuation.
These projections reflect the following key economic assumptions:

Discount rate:

<table>
<thead>
<tr>
<th></th>
<th>December 31, 2016 and all subsequent years</th>
<th>December 31, 2015</th>
</tr>
</thead>
<tbody>
<tr>
<td>LG&amp;E and KU Postretirement Benefit Plan</td>
<td>4.31%</td>
<td>4.49%</td>
</tr>
</tbody>
</table>

December 31, 2015 discount rates are based on the results of the Willis Towers Watson BOND:Link model as of December 31, 2015. Annuity cash flows by plan are based on the results of the 2015 actuarial valuation results.

December 31, 2016 and all subsequent years discount rates were developed based on April 30, 2016 BOND:Link results plus 25 basis points.

Expected return on assets (EROA):

<table>
<thead>
<tr>
<th></th>
<th>December 31, 2016 and all subsequent years</th>
<th>December 31, 2015</th>
</tr>
</thead>
<tbody>
<tr>
<td>LG&amp;E Energy LLC Postretirement Benefit Plan</td>
<td></td>
<td></td>
</tr>
<tr>
<td>- Union VEBA*</td>
<td>0.00%</td>
<td>0.00%</td>
</tr>
<tr>
<td>- Nonunion VEBA*</td>
<td>0.00%</td>
<td>0.00%</td>
</tr>
<tr>
<td>- 401(h) sub-account</td>
<td>7.00%</td>
<td>7.00%</td>
</tr>
</tbody>
</table>

* Historically used as a short-term payment vehicle, not long-term investment trust

Service cost growth:
The service cost for the qualified pension plans is assumed to remain constant for future years. The service cost for the welfare plan is assumed to grow at the same rate as the discount rate.
Actual return on assets:

<table>
<thead>
<tr>
<th></th>
<th>2016 and all subsequent years</th>
</tr>
</thead>
<tbody>
<tr>
<td>LG&amp;E Energy LLC Postretirement Benefit Plan</td>
<td></td>
</tr>
<tr>
<td>- Union VEBA*</td>
<td>0.00%</td>
</tr>
<tr>
<td>- Nonunion VEBA*</td>
<td>0.00%</td>
</tr>
<tr>
<td>- 401(h) sub-account</td>
<td>7.00%</td>
</tr>
</tbody>
</table>

Health care cost trend:

<table>
<thead>
<tr>
<th></th>
<th>December 31, 2016 and all subsequent years</th>
<th>December 31, 2015</th>
</tr>
</thead>
<tbody>
<tr>
<td>2016</td>
<td>N/A</td>
<td>6.8%</td>
</tr>
<tr>
<td>2017</td>
<td>7.0%</td>
<td>6.4%</td>
</tr>
<tr>
<td>2018</td>
<td>6.8%</td>
<td>6.0%</td>
</tr>
<tr>
<td>2019</td>
<td>6.6%</td>
<td>5.5%</td>
</tr>
<tr>
<td>2020</td>
<td>6.2%</td>
<td>5.0%</td>
</tr>
<tr>
<td>2021</td>
<td>5.8%</td>
<td>5.0%</td>
</tr>
<tr>
<td>2022</td>
<td>5.4%</td>
<td>5.0%</td>
</tr>
<tr>
<td>2023+</td>
<td>5.0%</td>
<td>5.0%</td>
</tr>
</tbody>
</table>

Demographic assumptions:

1. All demographic assumptions are the same as those selected by LKE at December 31, 2015.

   A summary of all other assumptions can be found in the Financial Disclosure letter provided to LKE on January 20, 2016. Detailed descriptions of these assumptions will be included in the actuarial valuation reports for the fiscal year ending December 31, 2016 (to be published during the coming months).

2. All plan provisions are the same as those valued at January 1, 2016.

   Detailed descriptions of the plan provisions will be included in the actuarial valuation reports for the fiscal year ending December 31, 2016 (to be published during the coming months).
The LG&E and KU Postretirement Benefit Plan is not closed, so there is no assumed decrease in the amortization period.

5. All contributions to the LG&E and KU Postretirement Benefit Plan are assumed to be made at the middle of the year (6/30). The projections reflect no prefunding for the Non-union and Union VEBAS.

6. Postretirement Benefit Plan administrative expenses were kept consistent with 2015 actual expenses during the projection period.

Actuarial certification

In preparing the calculations contained in this letter, Willis Towers Watson has used information and data provided to us by LKE and other persons or organizations designated by LKE. We have relied on all the data and information provided, including plan provisions and asset information, as being complete and accurate. We have reviewed this information for overall reasonableness and consistency but have neither audited nor independently verified this information.

As required by ASC 715, the actuarial assumptions and methods employed in the development of the pension and postretirement plan obligations have been selected by the plan sponsor. Willis Towers Watson has concurred with these assumptions and methods. ASC 715 requires that each significant assumption “individually represent the best estimate of a particular future event.”

For funding purposes, the plan sponsor selected, as prescribed by regulation, key assumptions and funding methods (including asset valuation method and choice among prescribed interest rates) employed in the development of the contribution. To the extent not prescribed by ERISA, the Internal Revenue Code and regulatory guidance from the Treasury and the IRS, or selected by the sponsor, the actuarial assumptions and methods employed in the development of the contribution amounts have been selected by Willis Towers Watson, with the concurrence of the plan sponsor. It is beyond the scope of this forecast to analyze the reasonableness and appropriateness of prescribed methods and assumptions, or to analyze other sponsor elections from among the alternatives available for prescribed methods and assumptions.

The results documented in this letter are estimates based on data that may be imperfect and on assumptions about future events that cannot be predicted with any certainty. Certain plan provisions may be approximated or determined to be immaterial and therefore not valued. Assumptions may be made about participant data or other factors. We have made reasonable efforts to ensure that items that are material in the context of the actuarial liabilities or costs are treated appropriately, and not excluded or included inappropriately.

Actual future experience will differ from the assumptions used in our calculations. As these differences arise, contributions or the cost for accounting purposes will be adjusted in future valuations to take changes into account. If these adjustments become material, they may result in future adjustments to the valuation model.

The results shown in this letter have been developed based on actuarial assumptions that, to the extent evaluated or selected by Willis Towers Watson, we consider to be reasonable. Other actuarial assumptions could also be considered to be reasonable. Thus, reasonable results differing from those presented in this report could have been developed by selecting different reasonable assumptions.
The numbers in this letter are not rounded, but this is for convenience only and should not imply precision, which is not a characteristic of actuarial calculations.

The calculations provided in this letter have been prepared solely for the benefit of LKE for budgeting purposes. This letter should not be used for other purposes, and we accept no responsibility for any such use. It should not be relied upon by, or shared with, any third parties without Willis Towers Watson’s prior written consent.

This letter is provided subject to the terms set out herein and in our engagement letter dated March 28, 2013 and any accompanying or referenced terms and conditions.

This letter provides actuarial calculations. It does not constitute legal, accounting, tax or investment advice. We encourage you to consult with qualified advisors with respect to those matters.

The undersigned consulting actuaries are members of the Society of Actuaries and other professional actuarial organizations and meet the “Qualification Standards for Actuaries Issuing Statements of Actuarial Opinion in the United States” relating to retirement plans. Our objectivity is not impaired by any relationship between the plan sponsor and our employer, Willis Towers Watson.

* * * * *

Please do not hesitate to call if you have any questions.

Sincerely,

Royce S. Kosoff, FSA, EA, CFA
Senior Consulting Actuary
Direct Dial: 215-246-6815

Jennifer A. Della Pietra, ASA, EA
Senior Consulting Actuary
Direct Dial: 215-246-6861

cc: David Crosby – LG&E and KU Energy LLC
    Dan Arbough – LG&E and KU Energy LLC
    George Sunder – PPL Corporation
    Julissa Burgos – PPL Corporation
    Brad Dreisbach – Willis Towers Watson
### 2017 Estimated ASC 715 Net Periodic Benefit Cost (“NPBC”) For Postretirement Benefit Plan

<table>
<thead>
<tr>
<th>Regulatory</th>
<th>LG&amp;E</th>
<th>ServCo</th>
<th>LG&amp;E Union</th>
</tr>
</thead>
<tbody>
<tr>
<td>Service cost</td>
<td>601,912</td>
<td>485,592</td>
<td>2,490,905</td>
</tr>
<tr>
<td>Interest cost</td>
<td>1,348,668</td>
<td>1,943,933</td>
<td>1,986,954</td>
</tr>
<tr>
<td>Expected return on assets</td>
<td>(745,535)</td>
<td>-</td>
<td>(3,251,278)</td>
</tr>
<tr>
<td>Amortizations:</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Transition</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Prior service cost</td>
<td>78,595</td>
<td>496,348</td>
<td>131,664</td>
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<tr>
<td>(Gain)/loss</td>
<td></td>
<td>(58,961)</td>
<td>-</td>
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<tr>
<td>ASC 715 NPBC</td>
<td>1,283,640</td>
<td>2,866,912</td>
<td>1,358,245</td>
</tr>
</tbody>
</table>

### 2018 Estimated ASC 715 Net Periodic Benefit Cost (“NPBC”) For Postretirement Benefit Plan

<table>
<thead>
<tr>
<th>Regulatory</th>
<th>LG&amp;E</th>
<th>ServCo</th>
<th>LG&amp;E Union</th>
</tr>
</thead>
<tbody>
<tr>
<td>Service cost</td>
<td>624,123</td>
<td>503,510</td>
<td>2,582,619</td>
</tr>
<tr>
<td>Interest cost</td>
<td>1,328,698</td>
<td>1,894,707</td>
<td>2,063,761</td>
</tr>
<tr>
<td>Expected return on assets</td>
<td>(720,796)</td>
<td>-</td>
<td>(3,604,571)</td>
</tr>
<tr>
<td>Amortizations:</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Transition</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Prior service cost</td>
<td>78,595</td>
<td>496,348</td>
<td>131,663</td>
</tr>
<tr>
<td>(Gain)/loss</td>
<td></td>
<td>(63,928)</td>
<td>-</td>
</tr>
<tr>
<td>ASC 715 NPBC</td>
<td>1,310,620</td>
<td>2,830,637</td>
<td>1,173,672</td>
</tr>
</tbody>
</table>

### Notes
1. These accounting projections are based on the January 1, 2016 valuation results provided on May 6, 2016. The description of the data, assumptions, methods, plan provisions, and limitations as set forth in the accounting valuation results cover letter should be considered part of these results. Please see the attached letter for a description of all other assumptions and methods used in this analysis, including a discount rate of 3.69% and revised per capital claim cost trend assumption.
2. Non-union and Union VEBA amounts are assumed to remain level over the projection period (i.e., contributions equal disbursements and a 0.00% actual return on assets). 401(h) amounts are assumed to earn 7.00% in 2016 and subsequent years. Contributions to the 401(h) account are assumed to be equal to the maximum deductible amount, starting in 2016 and are expected to be contributed at June 30th of the following fiscal year. Benefit payments are assumed to be paid from the 401(h) account beginning in 2017, to the extent allowable.
3. We have assumed service cost growth equal to the discount rate (3.69% per year).
2019 Estimated ASC 715 Net Periodic Benefit Cost (“NPBC”) For Postretirement Benefit Plan

<table>
<thead>
<tr>
<th>Regulatory</th>
<th>LG&amp;E</th>
<th>LG&amp;E Union</th>
<th>ServCo</th>
</tr>
</thead>
<tbody>
<tr>
<td>Service cost</td>
<td>647,153</td>
<td>522,090</td>
<td>2,678,125</td>
</tr>
<tr>
<td>Interest cost</td>
<td>1,307,008</td>
<td>1,839,559</td>
<td>2,132,768</td>
</tr>
<tr>
<td>Expected return on assets</td>
<td>(691,726)</td>
<td>-</td>
<td>(3,955,552)</td>
</tr>
<tr>
<td>Amortizations:</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Transition</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
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<td>78,595</td>
<td>496,348</td>
<td>131,663</td>
</tr>
<tr>
<td>(Gain)/loss</td>
<td>(69,710)</td>
<td>(69,710)</td>
<td>-</td>
</tr>
<tr>
<td>ASC 715 NPBC</td>
<td>1,341,030</td>
<td>2,788,287</td>
<td>987,004</td>
</tr>
</tbody>
</table>

**Notes**

1. These accounting projections are based on the January 1, 2016 valuation results provided on May 6, 2016. The description of the data, assumptions, methods, plan provisions, and limitations as set forth in the accounting valuation results cover letter should be considered part of these results. Please see the attached letter for a description of all other assumptions and methods used in this analysis, including a discount rate of 3.69% and revised per capita claim trend assumption.

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3. We have assumed service cost growth equal to the discount rate (3.69% per year).
### PLAN PROVISION CHANGES FOR POSTRETIREMENT BENEFIT PLAN
**USED IN 2017-2021 PROJECTIONS**

<table>
<thead>
<tr>
<th>Effective Date for Projection Purposes</th>
<th>Non-Union and LG&amp;E Union Plans</th>
</tr>
</thead>
<tbody>
<tr>
<td>January 1, 2017</td>
<td></td>
</tr>
<tr>
<td>January 1, 2018</td>
<td></td>
</tr>
<tr>
<td>January 1, 2019</td>
<td></td>
</tr>
</tbody>
</table>
May 2, 2016

Ms. Jeanne Kugler
Manager, Risk Management
LG&E and KU Energy LLC
220 West Main Street
Louisville, KY 40202

Dear Jeanne:

2016 ASC 715 ACCOUNTING RESULTS FOR THE POSTRETIREMENT BENEFIT PLAN

LG&E and KU Energy LLC (“LKE” or “the Company”) engaged Towers Watson Delaware, Inc. (“Willis Towers Watson”) to determine the Net Periodic Benefit Cost/Income (“NPBC”) for the LG&E and KU Energy Postretirement Benefit Plan, in accordance with FASB Accounting Standards Codification Topic 715 (“ASC 715”) for the fiscal year beginning January 1, 2016. The exhibits that follow provide results for the plan, with allocations as requested by LKE.

Reconciliation to June 26, 2015 Budget Projections

The preliminary 2016 consolidated US GAAP NPBC for the postretirement benefit plan of $9.4 million compares to the projected 2016 consolidated NPBC of $10.3 million provided in our June 26, 2015 e-mail as follows:

<table>
<thead>
<tr>
<th></th>
<th>Consolidated US GAAP NPBC (in $millions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>2016 Projected NPBC provided on June 26, 2015</td>
<td>$10.3</td>
</tr>
<tr>
<td>Actual 2015 return (vs. expected return in budget), offset by 7.00% EROA compared to 6.75% in budget</td>
<td>0.2</td>
</tr>
<tr>
<td>Demographic gains due to updated data compared to roll forward</td>
<td>(0.5)</td>
</tr>
<tr>
<td>Updated discount rate at December 31, 2015</td>
<td>0.0</td>
</tr>
<tr>
<td>Reflection of updated per capita claims data, including aging table</td>
<td>(0.6)</td>
</tr>
<tr>
<td>2016 Preliminary NPBC</td>
<td>$9.4</td>
</tr>
</tbody>
</table>
Reconciliation to Actual 2015 NPBC

The preliminary 2016 consolidated US GAAP NPBC for the postretirement benefit plan of $9.4 million compares to the actual 2015 consolidated NPBC of $11.1 million as follows:

<table>
<thead>
<tr>
<th>Consolidated US GAAP NPBC (in $millions)</th>
<th>2015 Actual NPBC</th>
<th>Economic gains due to asset increases during 2015</th>
<th>Demographic gains due to updated data</th>
<th>Updated discount rate at December 31, 2015</th>
<th>Reflection of updated per capita claims data, including aging table</th>
<th>Expiration of Prior Service Cost Bases for LG&amp;E Union</th>
<th>2016 Preliminary NPBC</th>
</tr>
</thead>
<tbody>
<tr>
<td>2015 Actual NPBC</td>
<td>$11.1</td>
<td>(0.4)</td>
<td>(0.3)</td>
<td>0.0</td>
<td>(0.6)</td>
<td>(0.4)</td>
<td>$9.4</td>
</tr>
</tbody>
</table>

Please note the following regarding these results:

1. As of January 1, 2016, LG&E and KU Energy LLC has selected the following economic assumptions:
   
   **Discount rate:**
   
   The discount rate of 4.49% is based on the results of the Towers Watson BOND:Link model. At December 31, 2015, cash flows by plan were used to develop individual discount rates. Further information regarding the BOND:Link model parameters chosen by LKE can be found in our e-mail correspondence from January 8, 2016.

   **Rate of compensation increase:**
   
   The January 1, 2016 rate of compensation increase assumption for the plan is a flat 3.50% at all ages.
Expected return on assets (EROA):

The January 1, 2016 EROA assumption for the plan is 7.00% for the 401(h) sub-account and 0.00% for the Union and Non-union VEBAs, which have historically been used as short-term payment vehicles.

Health care cost trend:

<table>
<thead>
<tr>
<th>Year</th>
<th>December 31, 2015</th>
</tr>
</thead>
<tbody>
<tr>
<td>2016</td>
<td>6.8%</td>
</tr>
<tr>
<td>2017</td>
<td>6.4%</td>
</tr>
<tr>
<td>2018</td>
<td>6.0%</td>
</tr>
<tr>
<td>2019</td>
<td>5.5%</td>
</tr>
<tr>
<td>2020+</td>
<td>5.0%</td>
</tr>
</tbody>
</table>

Per capita claims cost:

The per capita claims costs and employee contribution amounts for 2016 were provided by Mercer. We have reviewed the claims information for reasonableness and consistency, but have neither audited nor independently verified this information.

In addition, the aging table was updated and provided by Mercer as follows:

<table>
<thead>
<tr>
<th>Age</th>
<th>January 1, 2016</th>
<th>January 1, 2015</th>
</tr>
</thead>
<tbody>
<tr>
<td>20 – 24</td>
<td>2.35%</td>
<td>3.5%</td>
</tr>
<tr>
<td>25 – 29</td>
<td>5.89%</td>
<td>3.5%</td>
</tr>
<tr>
<td>30 – 34</td>
<td>2.53%</td>
<td>3.5%</td>
</tr>
<tr>
<td>35 – 39</td>
<td>1.92%</td>
<td>3.5%</td>
</tr>
<tr>
<td>40 – 44</td>
<td>2.73%</td>
<td>3.5%</td>
</tr>
<tr>
<td>45 – 49</td>
<td>4.23%</td>
<td>3.5%</td>
</tr>
<tr>
<td>50 – 54</td>
<td>4.38%</td>
<td>3.5%</td>
</tr>
<tr>
<td>55 – 59</td>
<td>4.11%</td>
<td>3.5%</td>
</tr>
<tr>
<td>60 – 64</td>
<td>4.57%</td>
<td>3.5%</td>
</tr>
<tr>
<td>65 – 69</td>
<td>2.41%</td>
<td>2.5%</td>
</tr>
<tr>
<td>70 – 74</td>
<td>1.94%</td>
<td>2.0%</td>
</tr>
<tr>
<td>75 – 79</td>
<td>1.33%</td>
<td>1.5%</td>
</tr>
<tr>
<td>80 – 84</td>
<td>0.78%</td>
<td>1.5%</td>
</tr>
<tr>
<td>85 – 90</td>
<td>0.19%</td>
<td>1.5%</td>
</tr>
<tr>
<td>90 – 94</td>
<td>-1.12%</td>
<td>1.5%</td>
</tr>
<tr>
<td>95+</td>
<td>0.00%</td>
<td>1.5%</td>
</tr>
</tbody>
</table>

2. All plan provisions are the same as those valued at January 1, 2015. Detailed descriptions of the plan provisions will be included in the actuarial valuation reports for the fiscal year ending December 31, 2015 (to be published during the coming months).
3. The expected contributions to the 401(h) sub-account are assumed to be contributed on June 30th, 2016 and, therefore, six months of expected return on assets is reflected. The expected contributions to the Union and Non-union VEBAs are assumed to be made monthly equal to the amounts paid out of the VEBA account each month.

<table>
<thead>
<tr>
<th>$ millions</th>
<th>401(h) Sub-account Contributions</th>
</tr>
</thead>
<tbody>
<tr>
<td>LG&amp;E Non-union</td>
<td>$0.937</td>
</tr>
<tr>
<td>ServCo</td>
<td>$3.887</td>
</tr>
</tbody>
</table>

4. Under PPACA, the Transitional Reinsurance Fee (“TRF”) is scheduled to be collected from both self-insured employer medical plans and fully insured medical plans beginning in 2014 and continuing through 2016 as a means to help stabilize premiums for coverage in the individual market (inside and outside the exchanges). Consistent with the prior year, the TRF will be accounted for outside of the plan, and therefore, the 2016 postretirement benefit obligations have not been adjusted to reflect the expected cost of the TRF.

**Actuarial Certification**

In preparing the results presented in this letter (including the attached exhibit), we have relied upon information regarding plan provisions, participants, assets and sponsor accounting policies and methods provided by LKE and other persons or organizations designated by LKE. We have relied on all the data and information provided as complete and accurate. We have reviewed this information for overall reasonableness and consistency, but have neither audited nor independently verified this information. Based on discussions with and concurrence by the plan sponsor, assumptions or estimates may have been made if data were not available. We are not aware of any errors or omissions in the data that would have a significant effect on the results of our calculations. The results presented in this report are directly dependent upon the accuracy and completeness of the underlying data and information. Any material inaccuracy in the data, assets, plan provisions or other information provided to us may have produced results that are not suitable for the purposes of this report and such inaccuracies, as corrected by LKE, may produce materially different results that could require that a revised report be issued.

The measurement date is January 1, 2016. The benefit obligations were measured as of January 1, 2016 and are based on participant data as of the census date, January 1, 2016.

Information about the fair value of plan assets was furnished to us by BNY Mellon. LKE also provided information about the general ledger account balances for the postretirement benefit plan cost at December 31, 2015, which reflect the expected funded status of the plans before adjustment to reflect the plans’ funded status based on the year-end measurements, and differences between the expected Medicare Part D subsidies and amounts received during the year. Willis Towers Watson used information supplied by LKE regarding postretirement benefit asset, postretirement liability and amounts recognized in accumulated other comprehensive income as of December 31, 2015. This data was reviewed for reasonableness and consistency, but no audit was performed.
Accumulated other comprehensive (income)/loss amounts shown in this letter are shown prior to adjustment for deferred taxes. Any deferred tax effects in AOCI should be determined in consultation with LKE’s tax advisors and auditors.

As required by U.S. GAAP, the actuarial assumptions and the accounting policies and methods employed in the development of the postretirement benefit cost and financial reporting have been selected by LKE. Willis Towers Watson has concurred with these assumptions and methods. ASC 715-30-35 requires that each significant assumption “individually represent the best estimate of a particular future event.”

The results shown in this report have been developed based on actuarial assumptions that, to the extent evaluated by Willis Towers Watson, we consider to be reasonable. Other actuarial assumptions could also be considered to be reasonable. Thus, reasonable results differing from those presented in this report could have been developed by selecting different reasonable assumptions.

The results shown in this report are estimates based on data that may be imperfect and on assumptions about future events that cannot be predicted with any certainty. The effects of certain plan provisions may be approximated, or determined to be insignificant and therefore not valued. Reasonable efforts were made in preparing this valuation to confirm that items that are significant in the context of the actuarial liabilities or costs are treated appropriately, and are not excluded or included inappropriately. The numbers shown in this report are not rounded, but this is for convenience and should not imply precision, which is not a characteristic of actuarial calculations.

If overall future plan experience produces higher benefit payments or lower investment returns than assumed, the relative level of plan costs reported in this valuation will likely increase in future valuations (and vice versa). Future actuarial measurements may differ significantly from the current measurements presented in this report due to many factors, including: plan experience differing from that anticipated by the economic or demographic assumptions, increases or decreases expected as part of the natural operation of the methodology used for the measurements (such as the end of an amortization period), and changes in plan provisions or applicable law.

The information contained in this report was prepared for the internal use of LKE and its auditors in connection with our actuarial valuation of the postretirement benefit plan. It is neither intended for and may not be used for other purposes, and we accept no responsibility or liability in this regard. LKE may distribute this actuarial valuation report to the appropriate authorities who have the legal right to require LKE to provide them this report, in which case LKE will use best efforts to notify Willis Towers Watson in advance of this distribution. Further distribution to, or use by, other parties of all or part of this document is expressly prohibited without Willis Towers Watson’s prior written consent. Willis Towers Watson accepts no responsibility for any consequences arising from any other party relying on this report or any advice relating to its contents.

The undersigned consulting actuaries are members of the Society of Actuaries and meet the “Qualification Standards for Actuaries Issuing Statements of Actuarial Opinion in the United States” relating to other postretirement benefit plans. Our objectivity is not impaired by any relationship between the plan sponsor and our employer, Towers Watson Delaware Inc.
Please do not hesitate to call if you have any questions.

Sincerely,

Jennifer A. Della Pietra, ASA, EA
Senior Consulting Actuary
Direct Dial: 215-246-6861

Royce S. Kosoff, FSA, EA, CFA
Senior Consulting Actuary
Direct Dial: 215-246-6815

cc: Dan Arbough – LG&E and KU Energy LLC
Jeanne Kugler – LG&E and KU Energy LLC
Kayla Coleman – LG&E and KU Energy LLC
George Sunder – PPL Corporation
Julissa Burgos – PPL Corporation
Kristin May, FSA, EA – Willis Towers Watson
Brad Dreisbach, ASA – Willis Towers Watson
## Post Retirement Welfare Plans

### LG&E and KU Energy LLC ("LKE")

#### 2016 Net Periodic Benefit Cost - Revised May 6, 2016

<table>
<thead>
<tr>
<th>Regulatory</th>
<th>LG&amp;E Union</th>
<th>ServCo</th>
<th>LG&amp;E Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>35,075,383</td>
<td>6,955,721</td>
<td>42,031,104</td>
</tr>
<tr>
<td>Funded Status</td>
<td>35,075,383</td>
<td>6,955,721</td>
<td>42,031,104</td>
</tr>
<tr>
<td>ARBO</td>
<td>9,622,530</td>
<td>816,823</td>
<td>10,439,353</td>
</tr>
<tr>
<td>Fair Value of Assets</td>
<td>(25,472,853)</td>
<td>(49,728,988)</td>
<td>(75,201,841)</td>
</tr>
<tr>
<td>Total Funded Status</td>
<td>(25,472,853)</td>
<td>(49,728,988)</td>
<td>(75,201,841)</td>
</tr>
</tbody>
</table>

**Amounts recognized in accumulated other comprehensive income consist of:**

- **Net actuarial loss/(gain)**: 12,842,328
- **Prior service cost/(credit)**: 1,156,025
- **Transition obligation/(asset)**: 3,570,026
- **Total**: 13,998,353

**2016 Net Periodic Benefit Cost**

<table>
<thead>
<tr>
<th>Description</th>
<th>LG&amp;E Non-union</th>
<th>LG&amp;E Union</th>
<th>ServCo</th>
<th>LG&amp;E Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Service cost</td>
<td>490,625</td>
<td>2,079,183</td>
<td>886,482</td>
<td></td>
</tr>
<tr>
<td>Interest cost</td>
<td>1,518,353</td>
<td>2,086,335</td>
<td>3,706,183</td>
<td></td>
</tr>
<tr>
<td>Expected return on assets</td>
<td>(705,154)</td>
<td>(2,830,234)</td>
<td>(705,154)</td>
<td></td>
</tr>
<tr>
<td>Amortization of:</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Transition obligation (asset)</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td></td>
</tr>
<tr>
<td>Prior service cost/(credit)</td>
<td>362,468</td>
<td>786,717</td>
<td>1,148,173</td>
<td></td>
</tr>
<tr>
<td>Actuarial (gain) loss</td>
<td></td>
<td>(915,034)</td>
<td></td>
<td>(915,034)</td>
</tr>
<tr>
<td>Total</td>
<td>1,666,280</td>
<td>2,854,370</td>
<td>1,979,852</td>
<td></td>
</tr>
</tbody>
</table>

**Key assumptions:**

- **Discount Rate**: 4.49%
- **Expected return on 401(h) assets**: 7.00%
- **Rate of compensation increase**: 3.50%
- **Mortality**: RP-2014 with collar adjustment (white collar for Non-union increased by 2%, blue collar for Union increased by 7%), removing MP-2014 improvement projections from 2006 to 2014 and applying Scale BB 2-Dimensional mortality improvements from 2006 on a generational basis

The results contained in this document are based on the individual participant data provided by Mercer and LKE as of January 1, 2016. All other assumptions, methods, and plan provisions are the same as those used for the year-end 2015 financial statement disclosures provided on January 19, 2016. The descriptions of the assumptions, methods, plan provisions, and limitations as set forth in the year-end 2015 financial statement disclosure letter should be considered part of these results.
May 15, 2015

Ms. Kelli Higdon
Senior Accounting Analyst
LG&E and KU Energy LLC
220 West Main Street
Louisville, KY  40202

Dear Kelli:

2015 ASC 715 ACCOUNTING RESULTS FOR THE POSTRETIREMENT BENEFIT PLAN

LG&E and KU Energy LLC ("LKE" or "the Company") engaged Towers Watson Delaware, Inc. ("Towers Watson") to determine the Net Periodic Benefit Cost/Income ("NPBC") for the LG&E and KU Energy Postretirement Benefit Plan, in accordance with FASB Accounting Standards Codification Topic 715 ("ASC 715") for the fiscal year beginning January 1, 2015. The exhibits that follow provide results for the plan, with allocations as requested by LKE.

Reconciliation to May 30, 2014 Budget Projections

The preliminary 2015 consolidated US GAAP NPBC for the postretirement benefit plan of $11.1 million compares to the projected 2015 consolidated NPBC of $11.6 million provided in our May 30, 2014 e-mail as follows:

<table>
<thead>
<tr>
<th>Description</th>
<th>Consolidated US GAAP NPBC (in $millions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>2015 Projected NPBC provided on May 30, 2014</td>
<td>$11.6</td>
</tr>
<tr>
<td>Economic gains due to higher than expected asset returns</td>
<td>(1.0)</td>
</tr>
<tr>
<td>Demographic gains due to updated data compared to roll forward</td>
<td>(0.6)</td>
</tr>
<tr>
<td>Impact of assumption changes other than discount rate and mortality</td>
<td>0.8</td>
</tr>
<tr>
<td>Updated discount rate at December 31, 2014</td>
<td>0.1</td>
</tr>
<tr>
<td>Updated mortality assumption at December 31, 2014</td>
<td>0.0</td>
</tr>
<tr>
<td>Reflection of updated per capita claims data</td>
<td>(0.5)</td>
</tr>
<tr>
<td>Effect of plan changes, including RMA contributions and RMC credits</td>
<td>0.9</td>
</tr>
<tr>
<td>Impact of 401(h) contribution at 6/30/15</td>
<td>(0.2)</td>
</tr>
<tr>
<td>2015 Preliminary NPBC</td>
<td>$11.1</td>
</tr>
</tbody>
</table>
Reconciliation to Actual 2014 NPBC

The preliminary 2015 consolidated U.S. GAAP NPBC for the postretirement benefit plan of $11.1 million compares to the actual 2014 consolidated NPBC of $10.4 million as follows:

<table>
<thead>
<tr>
<th>Consolidated U.S. GAAP NPBC (in $millions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>2014 Actual U.S. GAAP NPBC</td>
</tr>
<tr>
<td>Economic gains due to higher than expected asset returns</td>
</tr>
<tr>
<td>Demographic gains due to updated data</td>
</tr>
<tr>
<td>Impact of assumption changes other than discount rate and mortality</td>
</tr>
<tr>
<td>Discount rate change</td>
</tr>
<tr>
<td>Mortality assumption change</td>
</tr>
<tr>
<td>Reflection of updated per capita claims data</td>
</tr>
<tr>
<td>Effect of plan changes, including RMA contributions and RMC credits</td>
</tr>
<tr>
<td>Impact of 401(h) contribution at 6/30/15</td>
</tr>
<tr>
<td>2015 Preliminary U.S. GAAP NPBC</td>
</tr>
</tbody>
</table>

Please note the following regarding these results:

1. As of January 1, 2014, LG&E and KU Energy LLC has selected the following economic assumptions:
   
   **Discount rate:**

   The discount rate of 4.06% is based on the results of the Towers Watson BOND:Link model. At December 31, 2014, cash flows by plan were used to develop individual discount rates. Further information regarding the BOND:Link model parameters chosen by LKE can be found in our e-mail correspondence from January 7, 2015.
Rate of compensation increase:

The January 1, 2015 rate of compensation increase assumption for the plan is a flat 3.50% at all ages. This amount decreased from the flat 4.00% assumption as of January 1, 2014 based on long-term expectations of salary increase rates for the covered plan populations.

Expected return on assets (EROA):

The January 1, 2015 EROA assumption for the plan is 7.00% for the 401(h) sub-account and 0.00% for the Union and Non-union VEBAs, which have historically been used as short-term payment vehicles.

Health care cost trend:

<table>
<thead>
<tr>
<th></th>
<th>December 31, 2014</th>
</tr>
</thead>
<tbody>
<tr>
<td>2015</td>
<td>7.2%</td>
</tr>
<tr>
<td>2016</td>
<td>6.8%</td>
</tr>
<tr>
<td>2017</td>
<td>6.4%</td>
</tr>
<tr>
<td>2018</td>
<td>6.0%</td>
</tr>
<tr>
<td>2019</td>
<td>5.5%</td>
</tr>
<tr>
<td>2020+</td>
<td>5.0%</td>
</tr>
</tbody>
</table>

Per capita claims cost:

The per capita claims costs and employee contribution amounts for 2015 were provided by Mercer. We have reviewed the claims information for reasonableness and consistency, but have neither audited nor independently verified this information.

2. During 2014, LKE completed a demographic experience study to assess the appropriateness of the plans’ current demographic assumptions. Details regarding the results of the study can be found in our 2014 Experience Study and Demographic Assumptions Review presentation provided to PPL and LKE on November 12, 2014. As a result of that study, the following demographic assumptions were refined to better reflect anticipated future demographic experience. All remaining demographic assumptions remain consistent with those selected by LKE at January 1, 2014. Detailed descriptions of all demographic assumptions will be included in the actuarial valuation reports for the fiscal year ending December 31, 2015 (to be published during the coming months).

Retirement rates for active participants:

<table>
<thead>
<tr>
<th>Age</th>
<th>January 1, 2015</th>
<th>January 1, 2014</th>
</tr>
</thead>
<tbody>
<tr>
<td>55</td>
<td>3%</td>
<td>2%</td>
</tr>
<tr>
<td>56</td>
<td>3%</td>
<td>2%</td>
</tr>
<tr>
<td>57</td>
<td>4%</td>
<td>2%</td>
</tr>
<tr>
<td>58</td>
<td>5%</td>
<td>4%</td>
</tr>
<tr>
<td>59</td>
<td>10%</td>
<td>4%</td>
</tr>
<tr>
<td>60</td>
<td>20%</td>
<td>10%</td>
</tr>
<tr>
<td>61</td>
<td>20%</td>
<td>10%</td>
</tr>
<tr>
<td>62</td>
<td>35%</td>
<td>50%</td>
</tr>
<tr>
<td>63</td>
<td>25%</td>
<td>15%</td>
</tr>
<tr>
<td>64</td>
<td>25%</td>
<td>10%</td>
</tr>
<tr>
<td>65 - 67</td>
<td>50%</td>
<td>100%</td>
</tr>
<tr>
<td>68+</td>
<td>100%</td>
<td>100%</td>
</tr>
</tbody>
</table>
Termination:

For both the union and non-union populations, the termination assumption was updated to the SOA Hourly Union Termination Table.

Mortality:

For the non-bargained plans, the mortality assumption was updated to reflect the RP-2014 gender specific healthy employee and healthy annuitant mortality tables with white collar adjustment (removing MP-2014 improvement projections from 2006-2014), increased by 2%, and applying Scale BB 2-Dimensional mortality improvements from 2006 on a generational basis.

For bargained plans, the mortality assumption was updated to reflect the RP-2014 gender specific healthy employee and healthy annuitant mortality tables with blue collar adjustment (removing MP-2014 improvement projections from 2006-2014), increased by 7%, and applying Scale BB 2-Dimensional mortality improvements from 2006 on a generational basis.

The disabled mortality assumption was updated to reflect the RP-2014 “Disabled Retirees” table (removing MP-2014 improvement projections from 2006-2014) and applying Scale BB 2-Dimensional mortality improvements from 2006 on a generational basis.

3. All plan provisions are the same as those valued at January 1, 2014, with the following exceptions:

<table>
<thead>
<tr>
<th>Retiree Medical Account (RMA)</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>• RMA contribution increased from $2,000 to $2,500 per year</td>
<td></td>
</tr>
<tr>
<td>• Maximum RMA account balance limit for retirees increased from $30,000 to $37,500</td>
<td></td>
</tr>
<tr>
<td>• Corresponding increase for dependents (50% of RMA)</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Retiree Medical Credit (RMC)</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>• For ages 55-62, RMC retiree credit increased from $200/mo to $210/mo</td>
<td></td>
</tr>
<tr>
<td>• For ages 62-65, RMC retiree credit increased from $465/mo to $500/mo</td>
<td></td>
</tr>
<tr>
<td>• For ages 65 and older, RMC retiree credit increased from $200/mo to $210/mo</td>
<td></td>
</tr>
</tbody>
</table>

Detailed descriptions of the plan provisions will be included in the actuarial valuation reports for the fiscal year ending December 31, 2015 (to be published during the coming months).

4. The expected contributions to the 401(h) sub-account are assumed to be contributed on June 30th, 2015 and, therefore, six months of expected return on assets is reflected. The expected contributions to the Union and Non-union VEBAs are assumed to be made monthly equal to the amounts paid out of the Veba account each month.

<table>
<thead>
<tr>
<th>$ millions</th>
<th>401(h) Sub-account Contributions</th>
</tr>
</thead>
<tbody>
<tr>
<td>LG&amp;E Non-union</td>
<td>$ 0.81</td>
</tr>
<tr>
<td>ServCo</td>
<td>$ 3.35</td>
</tr>
</tbody>
</table>
5. Under PPACA, the Transitional Reinsurance Fee ("TRF") is scheduled to be collected from both self-insured employer medical plans and fully insured medical plans beginning in 2014 and continuing through 2016 as a means to help stabilize premiums for coverage in the individual market (inside and outside the exchanges). Consistent with the prior year, the TRF will be accounted for outside of the plan, and therefore, the 2015 postretirement benefit obligations have not been adjusted to reflect the expected cost of the TRF.

**Actuarial Certification**

In preparing the results presented in this letter (including the attached exhibit), we have relied upon information regarding plan provisions, participants, assets and sponsor accounting policies and methods provided by LKE and other persons or organizations designated by LKE. We have relied on all the data and information provided as complete and accurate. We have reviewed this information for overall reasonableness and consistency, but have neither audited nor independently verified this information. Based on discussions with and concurrence by the plan sponsor, assumptions or estimates may have been made if data were not available. We are not aware of any errors or omissions in the data that would have a significant effect on the results of our calculations. The results presented in this report are directly dependent upon the accuracy and completeness of the underlying data and information. Any material inaccuracy in the data, assets, plan provisions or other information provided to us may have produced results that are not suitable for the purposes of this report and such inaccuracies, as corrected by LKE, may produce materially different results that could require that a revised report be issued.

The measurement date is January 1, 2015. The benefit obligations were measured as of January 1, 2015 and are based on participant data as of the census date, January 1, 2015.

Information about the fair value of plan assets was furnished to us by BNY Mellon. LKE also provided information about the general ledger account balances for the postretirement benefit plan cost at December 31, 2014, which reflect the expected funded status of the plans before adjustment to reflect the plans’ funded status based on the year-end measurements, and differences between the expected Medicare Part D subsidies and amounts received during the year. Towers Watson used information supplied by LKE regarding postretirement benefit asset, postretirement liability and amounts recognized in accumulated other comprehensive income as of December 31, 2014. This data was reviewed for reasonableness and consistency, but no audit was performed.

Accumulated other comprehensive (income)/loss amounts shown in this letter are shown prior to adjustment for deferred taxes. Any deferred tax effects in AOCI should be determined in consultation with LKE’s tax advisors and auditors.

As required by U.S. GAAP, the actuarial assumptions and the accounting policies and methods employed in the development of the postretirement benefit cost and financial reporting have been selected by LKE. Towers Watson has concurred with these assumptions and methods. ASC 715-30-35 requires that each significant assumption “individually represent the best estimate of a particular future event.”

The results shown in this report have been developed based on actuarial assumptions that, to the extent evaluated by Towers Watson, we consider to be reasonable. Other actuarial assumptions could also be considered to be reasonable. Thus, reasonable results differing from those presented in this report could have been developed by selecting different reasonable assumptions.

The results shown in this report are estimates based on data that may be imperfect and on assumptions about future events that cannot be predicted with any certainty. The effects of certain plan provisions may be approximated, or determined to be insignificant and therefore not valued. Reasonable efforts were made in preparing this valuation to confirm that items that are significant in the context of the actuarial liabilities or costs are treated appropriately, and are not excluded or included inappropriately. The
numbers shown in this report are not rounded, but this is for convenience and should not imply precision, which is not a characteristic of actuarial calculations.

If overall future plan experience produces higher benefit payments or lower investment returns than assumed, the relative level of plan costs reported in this valuation will likely increase in future valuations (and vice versa). Future actuarial measurements may differ significantly from the current measurements presented in this report due to many factors, including: plan experience differing from that anticipated by the economic or demographic assumptions, increases or decreases expected as part of the natural operation of the methodology used for the measurements (such as the end of an amortization period), and changes in plan provisions or applicable law.

The information contained in this report was prepared for the internal use of LKE and its auditors in connection with our actuarial valuation of the postretirement benefit plan. It is neither intended for and may not be used for other purposes, and we accept no responsibility or liability in this regard. LKE may distribute this actuarial valuation report to the appropriate authorities who have the legal right to require LKE to provide them this report, in which case LKE will use best efforts to notify Towers Watson in advance of this distribution. Further distribution to, or use by, other parties of all or part of this document is expressly prohibited without Towers Watson’s prior written consent. Towers Watson accepts no responsibility for any consequences arising from any other party relying on this report or any advice relating to its contents.

The undersigned consulting actuaries are members of the Society of Actuaries and meet the “Qualification Standards for Actuaries Issuing Statements of Actuarial Opinion in the United States” relating to other postretirement benefit plans. Our objectivity is not impaired by any relationship between the plan sponsor and our employer, Towers Watson Delaware Inc.

*          *          *          *          *

Please do not hesitate to call if you have any questions.

Sincerely,

Jennifer A. Della Pietra, ASA, EA
Senior Consulting Actuary
Direct Dial: 215-246-6861

Royce S. Kosoff, FSA, EA, CFA
Senior Consulting Actuary
Direct Dial: 215-246-6815

William R. Loth, FSA, EA
Consulting Actuary
Direct Dial: 215-246-6647

cc: George Sunder – PPL Corporation
Dan Arbough – LG&E and KU Energy LLC
Jeanne Kugler – LG&E and KU Energy LLC
Julissa Burgos – PPL Corporation
Kristin May, FSA, EA – Towers Watson
Brad Dreisbach, ASA – Towers Watson
### LG&E and KU Energy LLC ("LKE")

#### 2015 Net Periodic Benefit Cost - Revised to include additional retirees in the WKE Non-union results

#### Post Retirement Welfare Plans

<table>
<thead>
<tr>
<th>Regulatory</th>
<th>LG&amp;E Non-union</th>
<th>LG&amp;E Union</th>
<th>ServCo</th>
<th>LG&amp;E Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Funded Status</td>
<td>36,956,987</td>
<td>55,638,162</td>
<td>9,304,140</td>
<td>102,595,149</td>
</tr>
<tr>
<td>Fair Value of Assets</td>
<td>9,304,140</td>
<td>954,431</td>
<td>(82,258,571)</td>
<td>(54,883,731)</td>
</tr>
<tr>
<td>Funded Status (27,652,847)</td>
<td>(54,883,731)</td>
<td>(82,258,571)</td>
<td>(82,258,571)</td>
<td>(82,258,571)</td>
</tr>
</tbody>
</table>

Amounts recognized in accumulated other comprehensive income consist of:

- **Net actuarial loss/(gain)**
  - LG&E Non-union: 13,864,638
  - LG&E Union: (7,493,176)
  - ServCo: 6,371,462
  - LG&E Total: 6,371,462

- **Prior service cost/(credit)**
  - LG&E Non-union: 1,518,483
  - LG&E Union: 4,755,391
  - ServCo: 6,273,874
  - LG&E Total: 6,273,874

- **Transition obligation/(asset)**
  - LG&E Non-union: -
  - LG&E Union: -
  - ServCo: -
  - LG&E Total: -

Total: 15,383,121

#### 2015 Net Periodic Benefit Cost

- **Service cost**: 577,928
  - LG&E Non-union: 577,928
  - LG&E Union: 509,460
  - ServCo: 2,396,489
  - LG&E Total: 3,296,459

- **Interest cost**: 1,448,386
  - LG&E Non-union: 1,448,386
  - LG&E Union: 2,186,041
  - ServCo: 1,968,430
  - LG&E Total: 5,605,877

- **Expected return on assets**: (679,797)
  - LG&E Non-union: (679,797)
  - LG&E Union: (2,585,157)
  - ServCo: (679,797)
  - LG&E Total: (679,797)

- **Amortization of**
  - Transition obligation (asset): -
  - Prior service cost (credit): 362,458
  - Actuarial (gain) loss: (156,948)

  Total: 1,185,365

Net periodic benefit cost: 1,763,397

#### Key assumptions:

- **Discount Rate**: 4.06%
  - LG&E Non-union: 4.06%
  - LG&E Union: 4.06%
  - ServCo: 4.06%
  - LG&E Total: 4.06%

- **Expected return on 401(h) assets**: 7.00%
  - LG&E Non-union: 7.00%
  - LG&E Union: 7.00%
  - ServCo: 7.00%
  - LG&E Total: 7.00%

- **Rate of compensation increase**: 3.50%
  - LG&E Non-union: 3.50%
  - LG&E Union: 3.50%
  - ServCo: 3.50%
  - LG&E Total: 3.50%

- **Mortality**
  - RP-2014 with collar adjustment (white collar for Non-union increased by 2%, blue collar for Union increased by 7%), removing MP-2014 improvement projections from 2006 to 2014 and applying Scale BB 2-Dimensional mortality improvements from 2006 on a generational basis

Health care cost trend rate

| Initial rate | 7.20% | 7.20% | 7.20% |
| Ultimate rate | 5.00% | 5.00% | 5.00% |
| Years to ultimate | 5 | 5 | 5 |

The results contained in this document are based on the individual participant data provided by Mercer and LKE as of January 1, 2015. 2015 per capita claim cost assumptions were provided by Mercer Health and Welfare actuaries. All other assumptions, methods, and plan provisions are the same as those used for the year-end 2014 financial statement disclosures provided on January 20, 2015. The descriptions of the assumptions, methods, plan provisions, and limitations as set forth in the year-end 2014 financial statement disclosure letter should be considered part of these results.
### Assumptions

<table>
<thead>
<tr>
<th>Mortality Assumption</th>
<th>Test Year</th>
</tr>
</thead>
<tbody>
<tr>
<td>LG&amp;E and KU Retirement Plan &amp; LG&amp;E Energy LLC Postretirement Benefit Plan</td>
<td>7/1/2015-6/30/2016</td>
</tr>
<tr>
<td>Louisville Gas and Electric Company Bargaining Employees' Retirement Plan</td>
<td></td>
</tr>
</tbody>
</table>

#### Discount Rate

<table>
<thead>
<tr>
<th>Plan Type</th>
<th>2015</th>
<th>2016</th>
<th>2017</th>
<th>2018</th>
</tr>
</thead>
<tbody>
<tr>
<td>LG&amp;E and KU Retirement Plan</td>
<td>4.70%</td>
<td>4.63%</td>
<td>4.41%</td>
<td>4.00%</td>
</tr>
<tr>
<td>Louisville Gas and Electric Company Bargaining Employees' Retirement Plan</td>
<td>7.00%</td>
<td>6.80%</td>
<td>6.40%</td>
<td>6.00%</td>
</tr>
</tbody>
</table>

#### Rate of Compensation Increase

<table>
<thead>
<tr>
<th>Year</th>
<th>Increase</th>
</tr>
</thead>
<tbody>
<tr>
<td>2015</td>
<td>7.20%</td>
</tr>
<tr>
<td>2016</td>
<td>6.80%</td>
</tr>
<tr>
<td>2017</td>
<td>6.40%</td>
</tr>
<tr>
<td>2018</td>
<td>6.00%</td>
</tr>
</tbody>
</table>

| Expected Return on Assets | 7.00% | 7.00% |

#### Health Care Cost Trend

<table>
<thead>
<tr>
<th>Year</th>
<th>Cost Trend</th>
</tr>
</thead>
<tbody>
<tr>
<td>2015</td>
<td>7.20%</td>
</tr>
<tr>
<td>2016</td>
<td>6.80%</td>
</tr>
<tr>
<td>2017</td>
<td>6.40%</td>
</tr>
<tr>
<td>2018</td>
<td>6.00%</td>
</tr>
</tbody>
</table>

No Lump Sum Option was available.

### Lump Sum Option

- The percentage of retiring and terminating participants assumed to take a lump sum is 50%. Lump sum benefits are valued reflecting the discount rate employed for accounting purposes and unisex RP-2014 healthy annuitant mortality table (e.g., 50/50 blend of gender specific tables), without collar adjustment (removing MP-2014 improvement projections from 2006-2014) and applying Scale BB 2-Dimensional mortality improvements form 2006 on a generational basis.
LOUISVILLE GAS AND ELECTRIC COMPANY

CASE NO. 2016-00371

Response to First Set of Data Requests of
Kentucky Industrial Utility Customers, Inc.
Dated January 11, 2017

Question No. 30

Responding Witness: Daniel K. Arbough

Q.1-30. Please provide the Company’s 2017, 2018, and 2019 pension and OPEB actuarial cost projections.

A.1-30. See attachment #1 to the response to Question No. 29.
Response to Question No. 31

Question No. 31

Responding Witness: Lonnie E. Bellar

Q.1-31. Refer to page 20, lines 18-21, of Mr. Garrett’s Direct Testimony wherein he describes an annual increase of $1.1 million in transmission maintenance of overhead lines resulting primarily from a move to a five-year cycle approach from a just-in time approach.

a. Please provide copies of all studies and/or analyses relied upon to justify the change in methodology and the amount of the annual increase.

b. Please quantify the expected annual benefits resulting in reduced outage maintenance expense as the result of moving to the cycle approach. If none, then please explain why.

c. Please confirm that the change to a five-year cycle approach from a just-in time approach should be expense neutral or result in a savings due to more efficient trimming aside from any savings in outage maintenance expense. If this cannot be confirmed, then please provide a detailed explanation why this is not correct.

A.1-31.

a. See attached.

b. Conversion to a cycle based approach and implementation of a hazard tree identification and removal program as part of transmission vegetation management is expected to primarily provide reliability benefits to customers. The full benefit of these programs will not be realized until after conversion to the five-year maintenance cycle and completion of the first cycle of the hazard tree program. The Company expects some reduction in outage maintenance expense, but has not quantified the reduction.

c. The referenced increases include the cost to convert to a five year maintenance cycle and implementation of a new hazard tree identification
and removal program which are expected to reduce tree related customer outages but may not be expense neutral. The Company did not specifically perform detailed analysis to determine O&M costs beyond the conversion timeframe.
At the request of Louisville Gas & Electric (LG&E) and Kentucky Utilities (KU), ECI has completed the survey of transmission rights-of-way and a review of the vegetation management program. The primary goal of the evaluation was to assess the vegetation workload on the LG&E and KU overhead transmission and develop a budget to support the vegetation management program. A secondary goal was to conduct a high-level assessment of the vegetation management program and identify general opportunities to enhance program management, reliability and cost effectiveness.

The workload survey was performed while accompanying LG&E and KU during fourth quarter aerial inspection. ECI’s program assessment consisted of a review of available program documentation provided by LG&E and KU and interviews with key personnel involved with the program. The survey and program review was a cooperative effort between LG&E, KU and ECI.

On the basis of ECI’s review, program strengths and opportunities for improvement were identified. Recommendations, based on the results of the review, ECI’s experience, and industry best practices, have been developed to provide LG&E and KU with a general plan for program improvement.

Vegetation conditions were sampled on approximately 18 percent of the total transmission line miles while the ECI survey team accompanied LG&E and KU during regularly scheduled aerial inspections. ECI survey teams inventoried approximately 1,076 transmission miles. The field data collected was used to estimate the total transmission system vegetation workload, maintenance budget and resource requirements. Table 1 presents a system summary of these results.

Table 1. Tree and Brush Workload Summary on the LG&E and KU Transmission System.

<table>
<thead>
<tr>
<th>Voltage (kV)</th>
<th>System Miles</th>
<th>Yard Trees</th>
<th>Edge Pruning Manual (ft.)</th>
<th>Edge Pruning – Mechanica l (ft.)</th>
<th>Re-Clear (ft.)</th>
<th>Manageable Brush Acres</th>
<th>¹Total System Cost (Millions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>69</td>
<td>2,570</td>
<td>10,400</td>
<td>6,602,600</td>
<td>1,826,300</td>
<td>26,900</td>
<td>16,900</td>
<td>$23.16</td>
</tr>
<tr>
<td>138</td>
<td>1,264</td>
<td>4,000</td>
<td>4,154,200</td>
<td>254,500</td>
<td>5,000</td>
<td>8,700</td>
<td>$10.62</td>
</tr>
<tr>
<td>161</td>
<td>667</td>
<td>400</td>
<td>2,636,700</td>
<td>887,400</td>
<td>10,500</td>
<td>6,800</td>
<td>$9.35</td>
</tr>
<tr>
<td>345</td>
<td>1,090</td>
<td>1,400</td>
<td>2,945,400</td>
<td>395,700</td>
<td>10,300</td>
<td>7,100</td>
<td>$8.30</td>
</tr>
<tr>
<td>500</td>
<td>237</td>
<td>1,400</td>
<td>224,600</td>
<td>1,019,600</td>
<td>5,400</td>
<td>3,000</td>
<td>$4.91</td>
</tr>
<tr>
<td>System:</td>
<td>5,827</td>
<td>16,200</td>
<td>16,563,500</td>
<td>4,383,500</td>
<td>47,800</td>
<td>42,500</td>
<td>$56.32</td>
</tr>
</tbody>
</table>

¹Reflects the cost to maintain the entire system. The exact cycle length to distribute the cost will need to be determined by LG&E and KU.
Key strengths of the current LG&E and KU vegetation maintenance program include the following:

- LG&E and KU management is supportive of program improvements.
- The program is focused on reliability and regulatory compliance.
- A centralized management structure is in place.
- Right-of-way (ROW) conditions are inspected on a quarterly basis.
- ‘Action Threshold Clearance’ has been established to ensure minimum acceptable clearances are not encroached upon, providing increased margin of safety regarding reliability.
- Tree-caused outages are formally investigated and documented, with trained personnel.
- Aerial herbicide applications are effectively used to control brush in rural ROW areas.

ECI recommends the following program specific items based on the field data collection and observations of current vegetation practices on the LG&E and KU transmission system:

1. Transition maintenance program to cyclical maintenance.
2. Continue to remove incompatible trees within the ROW and particularly under the conductors (within the wire zone corridor).
3. Determine and document the ROW width for all LG&E and KU transmission circuits.
4. Develop a hazard tree\(^2\) ground patrol to address potential risk from trees that may not be visible through normal routine aerial inspections.
5. Establish a list or database of hazard tree locations and develop a priority program to determine which trees should be removed first. This database may include ash trees that could be affected by the emerald ash borer (EAB).
6. Continue to enforce vegetation maintenance clearance specifications for transmission voltages and the policies and standards specific to LG&E and KU needs and conditions. Current specifications appear adequate to maintain vegetation on the transmission system.
7. Ensure that vegetation maintenance crews exhibit reasonable production levels by implementing a work reporting / measurement system and utilize the records to evaluate crews and compare contractor performance.
8. Implement Integrated Vegetation Management (IVM\(^3\)) as the guiding maintenance principle on the LG&E and KU transmission system.

\(^2\) Danger trees are trees tall enough to breach action threshold if they fell toward lines regardless of condition.
9. Re-establish the transmission corridor ROW edges wherever practical to bring the corridors back to specification by voltage.
10. Continue to maximize herbicide use where practical to minimize future vegetation management costs and better manage for compatible plant communities.
11. Once established maintain consistent transmission vegetation maintenance program funding to maximize overall program effectiveness and ensure compliance with NERC Standards FAC-003.
12. Consider increasing vegetation management oversight to address the addition of approximately 46 crews to meet workload requirement for a 5-year cycle (Appendix D).

3 IVM = A system of managing plant communities in which compatible and incompatible vegetation is identified, action thresholds are considered, control methods are evaluated, and selected control(s) are implemented to achieve a specific objective. Choice of control methods is based on effectiveness, environmental impact, site characteristics, safety, security and economics. *ANSI A300 (part 7)-2012 IVM.*
Introduction

At the request of LG&E and KU, ECI has documented the quantity and characteristics of the existing tree and brush workload that currently exists on the transmission system. In preparation for the survey:

- LG&E and KU supplied GPS transmission structure locations, flight schedule and helicopter for the vegetation survey, which included the states of Indiana, Kentucky, and Virginia.
- ECI provided the methodology, field personnel, and expertise necessary to conduct the study.

The fieldwork consisted of a sample survey of vegetation conditions that resulted in 18 percent (1,076 miles) of the transmission line miles throughout the service areas of two Pennsylvania Power and Light Corporation operating companies (OPCOs). These OPCOs are LG&E and KU. LG&E and KU supply power to 98 counties with combined total of approximately 1.3 million customers. The aerial survey occurred between October 20 and November 21, 2014. All data was collected on a span-by-span basis. Aerial data collection included: brush maintenance recommendations (mow, hand cut, foliar spray), edge tree maintenance workload, accessibility, and notations on danger and hazard trees adjacent to the ROW corridor (dead, dying, severe lean toward line, etc.). This report includes the following areas of evaluation:

1. Evaluation of field conditions designed to quantify the extent of maintenance required and recommended maintenance practices.
2. Evaluation of vegetation management practices and effectiveness compared to industry best practice methods.

Through phone interview and via email questionnaires, the current operation procedures and vegetation management practices were discussed with LG&E and KU staff.

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4 Danger tree: any tree that could contact the conductor if it fell or fall within the action threshold.
5 Hazard tree: a danger tree predisposed to failure due to disease, structure, dead or in decline, lean or soil conditions.
6 The six hazard trees observed during the aerial workload survey were reported to the LG&E and KU ROW Coordinate present during the flight.
This section presents general findings of ECI’s interview with LG&E and KU staff and the program information (i.e., historical budget, reliability, staffing level, etc.). On the basis of ECI’s review, program strengths and opportunities for improvement were identified. Recommendations, based on the results of the review, ECI’s experience, and industry best practices, have been developed to provide LG&E and KU with a general plan for program improvement.

**Current Operating Practices**

LG&E and KU has a centralized staff that manages vegetation on the system. Supervision over the vegetation management group has recently changed to the Transmission Line Construction department. The overall transmission vegetation management program goals are based on safety, reliability, cost effectiveness, fire safety and utilizing industry best management practices. LG&E and KU does have a comprehensive vegetation management plan and clearance specifications; however, does not manage a specific cycle. Currently, there are three ROW Coordinators who are each assigned to a specific region (East, Central and West) to manage.

Vegetation maintenance needs are determined by LG&E and KU ROW Coordinators based upon quarterly inspections performed. The patrol of transmission lines is predominately performed by helicopter. The ROW Coordinators and other experienced staff have received training on recognizing vegetation maintenance priorities or conditions that require immediate attention.

ROW Coordinators oversee vegetation maintenance performed by three vendors under a T&M contract. Asplundh Tree Expert, Co. and Phillips Tree Experts, Inc. are tree contractors used for vegetation maintenance from the ground. LG&E and KU are contracted with Summit Helicopters, Inc. to perform herbicide aerial spray treatments. Haverfield Aviation, Inc. was contracted to provide a helicopter for quarterly aerial inspection of the transmission lines.

Asplundh Tree Expert, Co. and Phillips Tree Experts, Inc. have signed a 5-year contract with LG&E and KU. The maintenance from the ground is equally split between the two contractors. Phillips Tree Experts, Inc. works in the eastern half of the transmission system where the terrain is steeper because of the rolling foothills and mountain ridges common to the Appalachian Mountain Range.

LG&E and KU provide notification to land owners regarding maintenance activities based upon the location of the transmission line within the state. Customers abutting rural sections of transmission line typically do not receive notification in the eastern half of Kentucky. Landowners of agricultural land and horse farms and those located in urban area generally receive notifications. Special notification and access permission to ROW is provided
when working on USDA Forest Service lands, military bases (Fort Knox) and other government owned land.

During a recent peer review project, LG&E and KU explained that land owner issues, skips, special areas were not tracked in any database. However, LG&E and KU informed ECI during an interview on August 20, 2014 that a spreadsheet to capture this information was being developed. Tracking customer issues or special previsions can help with reliability improvements, work planning, cycle selection, and tracking resolution status of refusals.

LG&E and KU follow the Kentucky Public Service Commission regulation pertaining to tree energized electrical equipment limits of approach. If these limits are breached by tree(s), lines are de-energized to perform vegetation maintenance. LG&E and KU have guidelines to determine immediate maintenance requirements (emergency or high priority due to vegetation proximity) vs. scheduled maintenance. LG&E and KU are subject to North American Electric Reliability Corporation (NERC) reliability standards and must practice due diligence in complying with NERC FAC-003 standards. LG&E and KU transmission system are specifically regulated by SERC Reliability Corporation, a regional entity of NERC. LG&E and KU have 1,327 miles of NERC lines (345 and 500kV system) and 4,500 miles of non-NERC lines (69, 138 and 161 kV system). LIDAR is performed on 50 percent of the NERC lines each year. Even though NERC FAC 003-3 standards require only one inspection per calendar year of vegetation conditions, LG&E and KU performs two vegetation only patrols during May and July. In addition, while LG&E and KU perform aerial patrols each quarter for critical visual inspection, the ROW Coordinator will document any vegetation that may have been missed during the vegetation only patrols in May and July.

LG&E and KU reliability staff perform an in-depth post-outage investigation of vegetation-caused outages. Outages listed as “vegetation” are separated by a secondary cause code (i.e., grow-in, fall-in from off-ROW, and fall-in from inside-ROW). The specific reason for a tree-caused outage is limited to three codes, but could be expanded to include additional cause codes for further reliability improvement. The additional secondary cause codes (i.e., hazard tree, mode of tree failure, etc.) would assist in further diagnosis of tree-caused outages.

A major concern for LG&E and KU are: hazard and danger trees – risk of fall-in from on and off ROW trees (117 fall-ins on 69, 138 and 161kV lines between 2008 and 2014). The all tree-caused interruptions are on non-NERC

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7 Each applicable Transmission Owner and applicable Generator Owner shall perform a Vegetation Inspection of 100% of its applicable transmission lines (measured in units of choice – circuit, pole line, line miles of kilometers, etc.) at least once per calendar year and with no more than 18 calendar months between inspections on the same ROW. FAC 003-3 R6. 2013
transmission lines due to on and off-ROW trees falling into the ROW. LG&E and KU have very few “grow-in” outages on the 69kV and higher voltage lines. No “grows-in” have been recorded on 345 and 500kV lines between 2008 and 2014. Before 2012 the secondary cause code was limited to fall-in within the ROW. The interruption may have resulted from a tree outside of the ROW but cause was classified as fall-in from inside the ROW. The secondary cause codes were expanded in 2012 to allow for the distinction between fall-ins for inside or outside of the ROW and grow-ins. Figure 1 shows the number of tree-caused outages between 2012 and 2014 for each of the secondary cause codes. Tree fall-ins, outside of the ROW, account for 85 percent of the tree-caused outages between 2012 and 2014.

![Figure 1. Total number tree-caused outages by secondary caused.](image)

Hazard trees are removed as they are found. However, since LG&E and KU have had 117 fall-ins over the course of 7 years there appears to be hazard trees that are possibly being missed during aerial inspections. A ground patrol may be warranted to identify hazard trees that are hidden under the canopy of larger mature trees.

A comprehensive recordkeeping and reporting system is an essential component of an effective line clearance program. A record keeping system should be capable of providing management with the following information:

- Justification of management decisions.
- Projections of annual budget requirements.
- Determination of the most cost effective crew type for various locations and work types.
- Prioritizing work by analysis of tree-caused outages and the inclusion of other metrics important to the utility.
- Detailed monitoring of crew productivity.
- Establishment of guidelines for tree removal and replacement (if implemented).
- Establishing a tracking process for customer refusals and hazard trees.

A comprehensive line clearance record keeping system depends on recording four components of all field activities: work location (i.e. circuit number), description of work completed (number of trims, removals, etc.), time required to complete the activity and any required materials (man and equipment hours). Time report verification, evaluation of crew productivity and accumulation of cost and production data all depend on these elements of activity reporting.

Recording crew time by specific work units and work related activities will provide the means to (1) examine detailed costs, (2) evaluate productivity, and (3) initiate appropriate changes to maximize the efficiency of the program. All record keeping needs to be adjusted to conform to the type of contract in place and the desired system metrics LG&E and KU desires.

**Time Utilization**

Time utilization measures can be used to evaluate crew time and production figures: time utilization, performance, and effectiveness.

Time utilization calculations allow a utility to determine what each crew does with the time it controls on a daily basis. For example, if time utilization is low, it indicates that the crew has excessive nonproductive time.

**Performance**

Performance is a measure that compares the actual time required to prune or remove a tree to the expected or standard time. Standards are developed from actual local data and are periodically evaluated for accuracy. The performance rating provides a good means for evaluating the production rates of each crew relative to an established set of standards. If performance is too high, it may suggest that a crew is inaccurately reporting work, obtaining inadequate clearance, or trimming brush (rather than removing brush). If performance is too low, it may suggest that the need for increased supervision and/or training.

**Effectiveness**

Effectiveness is calculated as a product of time utilization and performance (time utilization X performance/100). It provides a relative measure of what the return on expenditures is for each contract crew. Effectiveness ratings can be used to compare individual crews.
LG&E and KU has an electronic record keeping system to track circuit history, crew number, man hours, start and stop pole locations, labor cost, material cost, equipment cost, aerial spray acres and aerial spray cost. Even though their record keeping system tracks this information, the detail is limited and prevents any crew production analysis. The start/stop pole information does not include a linear distance and type of work performed (i.e., number of trims, linear distance mechanically pruned, removal, brush acres mowed, etc.). While LG&E and KU record the crew number for all work performed, the number of men or type of equipment used by the crew is not included. Once the electronic record keeping system is expanded to include this additional information, LG&E and KU can establish production metrics to track the efficiency of the vegetation maintenance program (i.e., cost per acre, cost per mile, etc.).

LG&E and KU does not currently possess the metrics necessary to effectively and efficiently manage the program. Data is collected from contractor invoices regarding total cost and man-hours only and are not tracked by individual work unit even though this type of information is available. The data contractor invoice does include information regarding number of units maintained or miles covered. Work is categorized on the LG&E and KU-required timesheet by the following classifications:

- Man-hours for each employee and equipment
  - Daily Hours (RT, OT, and DT)
  - Holiday
  - Vacation
  - Other
- Type of Work
- Type of Billing (T&M, Cost Plus, Unit, and Contract)
- Type of Crew (Tree or Other)
- Project number or account number (i.e. distribution, new construction)
- Herbicide Concentrate
  - Amount by unit (lbs or gallons)
- Tree Units and Man-hours by Unit
- Brush Units and Man-hours by Unit

Unit data (i.e. number of trees by maintenance type) is recorded on the timesheet but not captured as part of the current process for the electronic record keeping system. Additional details about contractor production would allow movement toward a performance-based component within a T&M contract, or become a basis for a unit cost removal component of firm priced
contracts (Appendix A). At a minimum, more detailed production data would provide an accurate assessment of production cost for various work-types for both internal and external comparisons.

Both record keeping software and record keeping services are available to provide streamlined invoice verification, cost tracking by asset and work type, metrics for process improvement and documentation of work accomplishment.

LG&E and KU are doing an admirable job in managing transmission vegetation with a limited budget. The size of the annual budget has necessitated a “just-in-time” approach to vegetation maintenance. The current maintenance practice of “just in time” or “hot spot” mowing, herbicide treatment, edge pruning on non-NERC lines has resulted in a system that is a patch work of various vegetation conditions on the ROW’s. Vegetation conditions on any given line range from clear (just maintained) to very tall brush or edge trees on low voltage lines requiring immediate attention. This can result in excessive “jumping” from location to location by the contractor, thus incurring additional travel time. The limited detail in the records regarding maintenance cost preclude developing a line maintenance history, determining the efficiency of the vendor and over-all lack of data to forecast future work effort and cost.

Through ECI’s aerial patrols, the vegetation workload was quantified, and utilizing LG&E and KU historical maintenance cost and available supplemental industry cost data, a maintenance budget has been established. Because maintenance has been on a “hot spot” basis, conversion to a more efficient and cost effective cyclic maintenance schedule will require several years to implement. During this implementation phase, “hot spot” maintenance will be required to maintain system reliability until cycles can be established. In addition, the early years of the conversion to cyclic maintenance may require a higher budget. Converting to a cyclic maintenance schedule will reduce unit production cost (lower density and shorter height brush), provide for reduced planning effort each year through reducing the number aerial inspections and provide for a sound basis to consider other contracting strategies.

The vegetation maintenance budget is presented to LG&E and KU senior management on an annual basis for approval. Budgets have been based on historical levels, not specifically to address cyclic maintenance requirements. The annual budget has remained fairly flat over the past 6 years (Table 2).
Table 2. LG&E and KU Historical Transmission Vegetation Maintenance Expenditures.

<table>
<thead>
<tr>
<th>Year</th>
<th>ROW Actuals</th>
<th>CPI – 2014</th>
</tr>
</thead>
<tbody>
<tr>
<td>2009</td>
<td>$4,425,830.31</td>
<td>$4,883,788.64</td>
</tr>
<tr>
<td>2010</td>
<td>$4,616,948.52</td>
<td>$5,012,464.34</td>
</tr>
<tr>
<td>2011</td>
<td>$5,313,879.93</td>
<td>$5,592,568.11</td>
</tr>
<tr>
<td>2012</td>
<td>$4,912,862.53</td>
<td>$5,065,687.36</td>
</tr>
<tr>
<td>2013</td>
<td>$5,570,389.98</td>
<td>$5,660,752.17</td>
</tr>
<tr>
<td>2014</td>
<td>$6,151,060.19</td>
<td>$6,151,060.19</td>
</tr>
</tbody>
</table>

LG&E and KU provided ECI with the electronic record keeping system for records from 2010 through 2014. From these records, ECI calculated aerial spray cost per acre. In addition, LG&E and KU provided ECI with weekly rates by crew type for calculating the estimated number crews need to manage the transmission system. LG&E and KU may choose to re-calculate the budget by changing some of the brush acres classified as low and high-volume foliar treatments to aerial spray treatments.

Vegetation conditions were sampled on 18 percent of the total transmission line miles to estimate the existing vegetation workload for each of the five voltages. ECI survey teams inventoried approximately 1,076 transmission miles. Field data gathered by the survey teams focused on tree and brush quantities, conditions, and maintenance requirements. The results of the study are included in the following sections.

ECI’s survey teams utilized the *Louisville Gas & Electric and Kentucky Utilities Services Company Transmission Vegetation Management Program (Revision 2013)* as the basis for determining current and future vegetation work load. The survey teams collected data on the vegetation conditions on the LG&E and KU transmission system using the form found in Appendix B.

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8 CPI – Consumer Price Index.
9 The actual vegetation expenses for each year were adjusted using the correct CPI and the base year of 2014. The adjustment was down to allow for a better comparison between years.
10 Actual vegetation expense through the end of November.
This section presents general findings of ECI’s workload assessment. Total workload projections are based on the total line miles as provided by LG&E and KU.

Table 3 represents the estimated total vegetation workload summary for the LG&E and KU transmission system by voltage class based on the sample survey.

Table 3. Tree and Brush Workload by Voltage Category (Transmission).

<table>
<thead>
<tr>
<th>Voltage</th>
<th>System Miles</th>
<th>System Acres</th>
<th>Yard Trees</th>
<th>Edge Pruning - Mechanical (ft.)</th>
<th>Edge Pruning - Manual (ft.)</th>
<th>Re-clear (ft.)</th>
<th>Manageable Brush Acres</th>
</tr>
</thead>
<tbody>
<tr>
<td>69</td>
<td>2,570</td>
<td>46,723</td>
<td>10,400</td>
<td>6,602,600</td>
<td>1,826,300</td>
<td>26,900</td>
<td>16,900</td>
</tr>
<tr>
<td>138</td>
<td>1,264</td>
<td>22,973</td>
<td>4,000</td>
<td>4,154,200</td>
<td>254,500</td>
<td>5,000</td>
<td>8,700</td>
</tr>
<tr>
<td>161</td>
<td>667</td>
<td>12,119</td>
<td>400</td>
<td>2,636,700</td>
<td>887,400</td>
<td>10,500</td>
<td>6,800</td>
</tr>
<tr>
<td>345</td>
<td>1,090</td>
<td>19,822</td>
<td>1,400</td>
<td>2,945,400</td>
<td>395,700</td>
<td>7,100</td>
<td></td>
</tr>
<tr>
<td>500</td>
<td>237</td>
<td>4,313</td>
<td></td>
<td>224,600</td>
<td>1,019,600</td>
<td>5,400</td>
<td>3,000</td>
</tr>
<tr>
<td>TOTAL</td>
<td>5,827</td>
<td>105,949</td>
<td>16,200</td>
<td>16,563,500</td>
<td>4,383,500</td>
<td>47,800</td>
<td>42,500</td>
</tr>
</tbody>
</table>
Total projected workload was projected for the LG&E and KU system based upon the conditions noted on the sampled miles. Table 2 indicates that approximately 16,563,500 linear feet (actual footage to be pruned not line footage) of ROW edge can be pruned using mechanical equipment (i.e. Jarraff or Skytrim crews), 4,383,500 feet consist of manual workload and 47,800 feet of ROW edge needs to be re-cleared to the establish ROW width. The estimated linear footage of ROW needing to be re-cleared was minimal because the ECI survey team counted work that had encroached from the established ROW width and not the actual easement width. LG&E and KU could not provide ECI the actual ROW easement or edge-to-edge width for each circuit. The small amount of estimated re-clear footage for 500kV lines resulted from the need to achieve additional clearance when a span of line extended from one ridge top to another.

More than 59 percent of the ROW edge workload was found on 138, 161, 345 and 500 kV lines which is expected considering these four voltages comprise approximately 55 percent of the total transmission line miles. Figure 2 shows the distribution of edge tree maintenance workload across the varying voltage classifications. Alternatively, Figure 3 presents the linear distance of edge tree maintenance on a per mile basis, which shows 161kV lines as having the highest concentration, followed by 500kV and 138kV lines.

![Figure 2: Percentage of Edge Tree Maintenance Workload by Voltage Classification.](attachment)
Yard trees account for approximately 16,200 total trees or 2.7 trees per mile at the system level. ECI estimates there are approximately 105,950 acres that comprise the entire LG&E and KU transmission system. Of those total acres, approximately 40 percent (or 42,500 acres) contain manageable brush acreage. Brush will be defined in greater detail later in the Brush Workload Characteristics section.

Tree and brush density was quantified in terms of trees per mile, linear distance per mile and acres per mile. Table 4 shows the average trees per mile (Yard Trees), linear distance per mile of ROW edge trimming (Mechanical, Manual and Re-clear), and brush acres per mile by voltage class on the LG&E and KU transmission system. These are trees and acres of brush requiring maintenance according to *Louisville Gas & Electric and Kentucky Utilities Services Company Transmission Vegetation Management Program (Revision 2013)*. The tree counts and brush acres per mile values as expressed in Table 4 were used to estimate the total quantities at the system level (as shown in Table 3).

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*Figure 3. Linear Distance of Edge Tree Maintenance per Mile by Voltage Classification*¹¹.

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*¹¹ Each side of the ROW was counted separately and then combined to provide actual footage to be pruned. Therefore, the linear footage per mile of workload can result in a number larger than a mile.*
Table 4. Average per mile tree and brush densities per mile on the LG&E and KU transmission system.

<table>
<thead>
<tr>
<th>Voltage</th>
<th>Total System Miles</th>
<th>Number of Yard Trees</th>
<th>Linear Distance for Mechanical Trimming (ft.)</th>
<th>Linear Distance for Manual Trimming (ft.)</th>
<th>Linear Distance for Re-clear of ROW (ft.)</th>
<th>Manageable Brush Acres</th>
</tr>
</thead>
<tbody>
<tr>
<td>69</td>
<td>2,570</td>
<td>4.0</td>
<td>2569.4</td>
<td>710.7</td>
<td>10.5</td>
<td>6.6</td>
</tr>
<tr>
<td>138</td>
<td>1,264</td>
<td>3.2</td>
<td>3287.8</td>
<td>201.4</td>
<td>4.0</td>
<td>6.9</td>
</tr>
<tr>
<td>161</td>
<td>667</td>
<td>0.6</td>
<td>3955.6</td>
<td>1331.3</td>
<td>15.7</td>
<td>10.1</td>
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<tr>
<td>345</td>
<td>1,090</td>
<td>1.3</td>
<td>2701.7</td>
<td>363.0</td>
<td>0.0</td>
<td>6.5</td>
</tr>
<tr>
<td>500</td>
<td>237</td>
<td>0.0</td>
<td>946.9</td>
<td>4298.6</td>
<td>23.0</td>
<td>12.5</td>
</tr>
</tbody>
</table>

**SYSTEM AVERAGE** 5,827 2.7 2918.8 692.8 7.8 7.3

The statistical sampling error was calculated for the transmission survey samples by voltage class. Statistical sampling error calculation was based upon the mean linear distance of tree workload and brush acreage per span at the 90 percent level of confidence. Sampling error for linear distance of tree workload per span for each voltage category were: 69kV = ± 3 percent; 138kV = ± 4 percent; 161kV = ± 4 percent; 345kV = ± 5 percent; and 500kV = ± 11 percent. Sampling error for brush acres per span for each voltage category were: 69kV = ± 3 percent; 138kV = ± 4 percent; 161kV = ± 4 percent; 345kV = ± 4 percent; and 500kV = ± 7 percent.

**Brush Workload Characteristics**

Brush workload was collected and characterized by maintenance practice. Table 5 shows the total estimated brush acres on the LG&E and KU system by maintenance practice.

Table 5. Brush Workload by Voltage Category and Maintenance Practice.

<table>
<thead>
<tr>
<th>Voltage</th>
<th>Total System Miles</th>
<th>Total System Acres</th>
<th>Mow Acres</th>
<th>Hand Cut and Treat Acres</th>
<th>Low-Volume Foliar Acres</th>
<th>High-Volume Foliar Acres</th>
<th>Manageable Brush Acres</th>
</tr>
</thead>
<tbody>
<tr>
<td>69</td>
<td>2,570</td>
<td>46,723</td>
<td>1,100</td>
<td>1,500</td>
<td>13,500</td>
<td>800</td>
<td>16,900</td>
</tr>
<tr>
<td>138</td>
<td>1,264</td>
<td>22,973</td>
<td>1,100</td>
<td>800</td>
<td>6,300</td>
<td>500</td>
<td>8,700</td>
</tr>
<tr>
<td>161</td>
<td>667</td>
<td>12,119</td>
<td>500</td>
<td>500</td>
<td>5,500</td>
<td>300</td>
<td>6,800</td>
</tr>
<tr>
<td>345</td>
<td>1,090</td>
<td>19,822</td>
<td>500</td>
<td>500</td>
<td>5,300</td>
<td>800</td>
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<td>237</td>
<td>4,314</td>
<td>100</td>
<td>100</td>
<td>900</td>
<td>1,900</td>
<td>3,000</td>
</tr>
</tbody>
</table>

**TOTAL** 5,827 105,950 3,300 3,400 31,500 4,300 42,500

Of the 105,950 total system acres identified on the LG&E and KU transmission system, approximately 40 percent (or 42,500 acres) currently
contain brush species (Figure 4). When estimating brush acres, locations that had the potential to support brush were included in the low-volume foliar management practice. The remaining 60 percent (or 63,450 acres) (Figure 5) are currently void of brush due to land use (e.g., agricultural land, maintained lawns, waterways, etc.).

Approximately 74 percent of the total manageable transmission brush acres were classified suitable for the maintenance practice of low-volume foliar treatment (i.e., backpack application of herbicide). For a location to be classified as low-volume foliar the stem heights were shorter than seven feet and stem density was approximately 1,500 or less per acre. Therefore, a large majority of the LG&E and KU transmission system is potentially manageable through low-volume herbicide maintenance work.

Figure 4. Percentage of Brush Acreage by Voltage Classification.

Figure 5. Percentage of Brush Acreage by Maintenance Practice.
Since the manageable brush acres on LG&E and KU transmission system was comprised of approximately 84 percent brush acres in the low and high-volume foliar treatment category, aerial treatments can be performed in an extremely cost effective manner using herbicides (where practical).

ECI documented specific transmission spans that fell short of the established ROW width. Table 2 presents the estimated linear feet of edge clearing required to reclaim existing overgrown rights-of-way to the established ROW edge. The tree and immature tree categories were deemed important in understanding the nature of the widening or re-clearing requirements, particularly since each may yield different clearing costs. Immature trees that could be cleared with a bush hog or hydro-axe were classified as mow acres. When clearing large trees required equipment such as a bull dozer or feller buncher then the work was classified as re-clear footage. Figure 6 shows examples of the specialized equipment commonly used for ROW clearing.

![Specialized Equipment Commonly Used in Transmission ROW Clearing and Widening.](image)

The 47,800 feet of ROW edge identified as requiring re-clearing back to the established ROW edge, comprised of less than one percent of the total linear distance requiring some form of tree maintenance.
As part of the field data collection, the ECI surveyors classified the workload within each span into eight maintenance categories. Accessibility was also recorded for each span for the purpose to estimate potential workload that would be ideal for aerial saw trimming. ECI estimated that for 17 percent of the workload, aerial saw trimming may be a suitable means to maintain the edge of the ROW. The categories used for classifying the workload are:

- MST – Mechanical side Trim (sky trim, Jarraff, etc)
- MT – manual trim
- RC – re-clear
- YT – yard tree
- MBH – mow: brush hog or hydro Ax (kershaw or similar)
- HC – hand cutting
- LVF – low-volume foliar herbicide treatment
- HVF – high-volume foliar herbicide treatment

Dependent upon the location a span may have work that was separated into different categories. For example, due to terrain a span may have a mixture of mechanical and manual side trimming work. It should also be noted that the total brush acres to be maintained over a five-year cycle would be higher than total brush acres observed on the system because some brush acres mechanically cut or hand cut should have a subsequent follow-up herbicide application scheduled in a future year (currently two years).

Recommendations were assigned based on current field conditions with emphasis on minimizing maintenance costs. In most cases, herbicide was recommended in lieu of mowing unless specific site conditions warranted otherwise. However, specific herbicide restrictions may negate some herbicide recommendations. The data provided here has not been adjusted to balance the annual spend.

Note that these recommendations serve only as an estimate of the workload by maintenance practice. Prior to beginning any work or budgeting for specific vegetation needs, it is recommended that the specific transmission lines to be worked be individually prescribed. This data serves only to characterize the existing workload.
Total vegetation management estimated costs and man-hours for the LG&E and KU transmission system are presented in Table 6. The detail in Table 7 presents the system total cost to maintain the tree and brush workload by management category and voltage on the LG&E and KU transmission system. Unit costs and weekly crew rates were used to calculate loaded labor and equipment rates (Table 8). The unit cost values were derived by ECI utilizing available industry data.

### Table 6. Total Transmission Budget and Man-Hour Estimate By Voltage.

<table>
<thead>
<tr>
<th>Voltage</th>
<th>Estimated Total Cost</th>
<th>Estimated Total Man Hours</th>
</tr>
</thead>
<tbody>
<tr>
<td>69</td>
<td>$23,158,000</td>
<td>716,800</td>
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<tr>
<td>138</td>
<td>$10,616,000</td>
<td>316,000</td>
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<td>161</td>
<td>$9,345,000</td>
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<td>345</td>
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</tr>
<tr>
<td>500</td>
<td>$4,908,000</td>
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<tr>
<td><strong>Grand Total</strong></td>
<td><strong>$56,322,000</strong></td>
<td><strong>1,823,200</strong></td>
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</table>

### Table 7. Total Budget by Management Category and Voltage for the LG&E and KU Transmission System.

<table>
<thead>
<tr>
<th>Voltage</th>
<th>Yard Trees</th>
<th>Mechanical</th>
<th>Manual</th>
<th>Re-Clear</th>
<th>Mow</th>
<th>Hand Cut</th>
<th>Low-Volume Foliar</th>
<th>High-Volume Foliar</th>
</tr>
</thead>
<tbody>
<tr>
<td>69</td>
<td>$780,000</td>
<td>$7,923,000</td>
<td>$5,844,000</td>
<td>$148,000</td>
<td>$556,000</td>
<td>$2,850,000</td>
<td>$4,725,000</td>
<td>$332,000</td>
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<tr>
<td>138</td>
<td>$300,000</td>
<td>$4,985,000</td>
<td>$814,000</td>
<td>$28,000</td>
<td>$556,000</td>
<td>$1,520,000</td>
<td>$2,205,000</td>
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<td>345</td>
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<td>$3,534,000</td>
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<td>$950,000</td>
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<tr>
<td>500</td>
<td>$270,000</td>
<td>$3,263,000</td>
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<td>$51,000</td>
<td>$190,000</td>
<td>$315,000</td>
<td>$789,000</td>
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<tr>
<td><strong>Total</strong></td>
<td><strong>$1,215,000</strong></td>
<td><strong>$19,876,000</strong></td>
<td><strong>$14,027,000</strong></td>
<td><strong>$263,000</strong></td>
<td><strong>$1,667,000</strong></td>
<td><strong>$6,460,000</strong></td>
<td><strong>$11,025,000</strong></td>
<td><strong>$1,785,000</strong></td>
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</table>

### Table 8. Unit Cost and LLER

<table>
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<tr>
<th>Management Category</th>
<th>Unit Cost</th>
<th>Unit</th>
<th>LLER</th>
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<tr>
<td>Yard Tree</td>
<td>$75.00</td>
<td>per tree</td>
<td>$31.48</td>
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<tr>
<td>Mechanical</td>
<td>$1.20</td>
<td>per foot</td>
<td>$41.05</td>
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<td>Manual</td>
<td>$3.20</td>
<td>per foot</td>
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<tr>
<td>Re-Clear</td>
<td>$5.50</td>
<td>per foot</td>
<td>$82.58</td>
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<tr>
<td>Mow</td>
<td>$505.00</td>
<td>per acre</td>
<td>$57.22</td>
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<tr>
<td>Hand Cut and Treat</td>
<td>$1,900.00</td>
<td>per acre</td>
<td>$32.22</td>
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<tr>
<td>Low-Volume Foliar</td>
<td>$350.00</td>
<td>per acre</td>
<td>$29.49</td>
</tr>
<tr>
<td>High-Volume Foliar</td>
<td>$415.00</td>
<td>per acre</td>
<td>$50.61</td>
</tr>
<tr>
<td>Aerial Spray</td>
<td>$297.00</td>
<td>per acre</td>
<td></td>
</tr>
</tbody>
</table>

Total budget to maintain the LG&E and KU transmission system for a targeted five-year cycle is estimated to be approximately $56.32 million (or
approximately $11.26M annually) and requires approximately 1.82 million man-hours (or 364,640 man-hours annually). The average system cost per transmission mile based on the estimated budget is $9,665 per mile or roughly $532 per system acre. Approximately 20 percent of the total budget dollars are allocated to low-volume herbicide work (LVF). Yard trees account for another two percent and incompatible ROW trees less than one percent. The three maintenance types (mechanical side trim, manual trim, and re-clear) for which industry unit cost values were used, account for approximately 61 percent of the total budget.

Based on the existing vegetation workload and the production values provided by LG&E and KU, crew resource needs were estimated. Table 9 presents a summary of the estimated annual crew resource requirements based on a five-year cycle.

It should be noted that crew estimates are approximate and are based on the average crew sizes as indicated. Available annual work hours were estimated to be 1,800 hours.

<table>
<thead>
<tr>
<th>Voltage</th>
<th>3-Man Yard Tree Crew</th>
<th>3-Man Mechanical Trimmer</th>
<th>3-Man Climbing Crew</th>
<th>3-Man Excavator Re-Clear Crew</th>
<th>3-Man Mowing Crew</th>
<th>3-Man Hand Cut Brush Crew</th>
<th>3-Man Low-Volume Foliar Crew</th>
<th>2-Man High-Volume Foliar Crew</th>
</tr>
</thead>
<tbody>
<tr>
<td>69</td>
<td>0.92</td>
<td>7.15</td>
<td>7.35</td>
<td>0.07</td>
<td>0.36</td>
<td>3.28</td>
<td>5.93</td>
<td>2.25</td>
</tr>
<tr>
<td>138</td>
<td>0.35</td>
<td>4.50</td>
<td>1.02</td>
<td>0.01</td>
<td>0.36</td>
<td>1.75</td>
<td>2.77</td>
<td>1.41</td>
</tr>
<tr>
<td>161</td>
<td>0.04</td>
<td>2.85</td>
<td>3.57</td>
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<td>0.16</td>
<td>1.09</td>
<td>2.33</td>
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<tr>
<td>345</td>
<td>0.12</td>
<td>3.19</td>
<td>1.59</td>
<td>0.00</td>
<td>0.16</td>
<td>1.09</td>
<td>2.33</td>
<td>2.25</td>
</tr>
<tr>
<td>500</td>
<td>0.00</td>
<td>0.24</td>
<td>4.10</td>
<td>0.01</td>
<td>0.03</td>
<td>0.22</td>
<td>0.40</td>
<td>5.34</td>
</tr>
<tr>
<td>Total</td>
<td>1.43</td>
<td>17.93</td>
<td>17.63</td>
<td>0.12</td>
<td>1.08</td>
<td>7.43</td>
<td>13.85</td>
<td>12.09</td>
</tr>
</tbody>
</table>

Crew estimates are based on the work type and recommended maintenance practice as determined by the ECI field surveyor. Changes to the maintenance practice will affect crew make-ups and allocations.

Herbicide crews account for approximately 25.9 crews annually or 36 percent of the total crews and will utilize approximately 34 percent of the annual budget. The two and three-man herbicide crews will provide the required support to complete the low and high-volume herbicide workload. Three-man mechanical and climbing crews are the largest resource requirement at approximately 35.7 crews annually or 50 percent of the total crews and will
utilize approximately 60 percent of the annual spend. The three-man mechanical and climbing crews will be responsible for all side trimming, incompatible ROW tree removals, and priority trees.
Recommendations

Utilizing the information gathered in the ground survey, ECI developed the estimated total transmission workload, budget, and man-hour requirements for the LG&E and KU transmission system.

Budget and workload assumptions:

- Recommended maintenance practices for the identified work units assume the utilization of Integrated Vegetation Management (IVM) principals and the maximization of herbicide use wherever possible to minimize future vegetation management expenditures. The use of herbicides will decrease future work (fewer stems per acre) thus requiring far less effort when IVM is fully implemented on the LG&E and KU system. With the implementation of IVM and continued herbicide use there should be minimal mowing required in future cycles.

- Brush acres maintained through mechanical brush clearing methods (i.e. mowers) were not incorporated into acre counts for high or low-volume herbicide treatment.

- Per request from LG&E and KU, the ROW width used for calculating the amount of brush acres was 150 feet for all transmission voltages. Actual ROW width varies between and within each voltage category and it is recommend that prior to assigning work brush acres would be re-calculated to represent actual ROW width for those schedule circuits.

Best management practices and IVM are the focus of the ECI recommendations presented in this section. Refer to Appendix C for additional details on recommended industry best management practices.

ECI recommends the following program specific items based on the field data collection and observations of current vegetation practices on the LG&E and KU transmission system:

1. Transition maintenance program to cyclical maintenance.
2. Continue to remove incompatible trees within the ROW and particularly under the conductors (within the wire zone corridor).
3. Determine and document the ROW width for all LG&E and KU transmission circuits.
4. Develop a hazard tree\textsuperscript{12} ground patrol to address potential risk from trees that may not be visible through normal routine aerial inspections.
5. Establish a list or database of hazard tree locations and develop a priority program to determine which trees should be removed first.

\textsuperscript{12} Danger trees are trees tall enough to breach action threshold if they fell toward lines regardless of condition.
This database may include ash trees that could be affected by the emerald ash borer (EAB).

6. Continue to enforce vegetation maintenance clearance specifications for transmission voltages and the policies and standards specific to LG&E and KU needs and conditions. Current specifications appear adequate to maintain vegetation on the transmission system.

7. Ensure that vegetation maintenance crews exhibit reasonable production levels by implementing a work reporting / measurement system and utilize the records to evaluate crews and compare contractor performance.

8. Implement Integrated Vegetation Management (IVM\(^{13}\)) as the guiding maintenance principle on the LG&E and KU transmission system.

9. Re-establish the transmission corridor ROW edges wherever practical to bring the corridors back to specification by voltage.

10. Continue to maximize herbicide use where practical to minimize future vegetation management costs and better manage for compatible plant communities.

11. Once established maintain consistent transmission vegetation maintenance program funding to maximize overall program effectiveness and ensure compliance with NERC Standards FAC-003.

12. Consider increasing vegetation management oversight to address the addition of approximately 46 crews to meet workload requirement for a 5-year cycle (Appendix D).

\(^{13}\) IVM = A system of managing plant communities in which compatible and incompatible vegetation is identified, action thresholds are considered, control methods are evaluated, and selected control(s) are implemented to achieve a specific objective. Choice of control methods is based on effectiveness, environmental impact, site characteristics, safety, security and economics. ANSI A300 (part 7)-2012 IVM.
Appendix A:
Contracting Strategies
Introduction to Contracting Strategies

Three different approaches are commonly used by electric utilities to contract line clearance work. These include "time and material/equipment" (T&M), "unit price" and "firm price" or "lump sum" pricing strategies. Each has advantages and disadvantages that are important to understand, and there are multiple variations possible within each pricing family. Each carries a different risk profile for the contractor and the utility. Unit price and firm price contacts are inherently performance-based contracts. However, T&M with incentive pricing can also be a performance-based contracting strategy.

Performance-based contract strategies generally offer the lowest production risk for the utility by placing the burden to monitor crew productivity on the tree contractor and “incentivizing” the contractor to control costs. This applies to firm price, lump sum, unit price, and T&M with incentive type contracts. However, it should be understood that in order for these contract strategies to be effective, the utility and contractor should have a thorough understanding of the work scope, historical man-hours and costs for the work units to be maintained within the contract period. While it is possible to utilize these specific contract types for all work (i.e. ticket type work as well as preventative maintenance work), they are the most effective in situations where the scope of work is better defined such as on preventative maintenance. Ticket work such as Customer Trim Requests and Restoration are often too variable and can lead to higher “unit” prices due to the “contingency” contractors may build into their bid to account for this uncertainty.

Where historical data is not available, some utilities are successful in developing performance-based contracts by clearly defining the project scope prior to bidding through the development of detailed work plans. Pre-planning to define clearances, clearance exceptions, and removals has proven to be a very effective strategy in receiving least cost competitive bids. Contractors provide pricing on the defined work scope that the utility has pre-designated, thus eliminating guess work on the part of the contractor and eliminating the “contingency” cost that contractors build into bids. However, this does require additional effort on the part of the utility to employ knowledgeable personnel to perform the pre-work planning as well as post work acceptance. This strategy generally works well when the utility is developing firm price contracts in the form of a guaranteed cost per mile or a guaranteed cost per circuit.

Utilizing a T&M with incentives, such as Target Pricing, is a viable alternative for preventative maintenance work, but does require an extensive knowledge of historical man-hours in order to develop “should take times” in order to set contractor valid targets or thresholds for each work unit. In this contract type, the utility agrees to pay the contractor for their total actual man-hours incurred to complete the work unit. The contractor in turn, agrees to meet the established target and “share” with the utility any cost savings.
achieved by completing the work unit with less man-hours than allotted. Some contracts also include a shared “penalty” where the contractor agrees to also share the cost of any work units exceeding the threshold man-hours thus, this provides the contractor with an incentive to find cost savings while minimizing their perceived risk in relation to their skepticism to utility provided targets.

Another variation to this contract type includes a T&M not to exceed. In this contract type, the contractor and utility agree that any cost savings will be shared; however, the contractor bears the entire burden for any cost over-runs above the man-hour threshold set by the utility. The advantage to this contract strategy is that the utility can have 100 percent confidence in their maximum expenditure which they can then use to better plan and budget. The disadvantage is that the contractor may include higher pricing due to the “contingency” variable and therefore, it may not offer the same cost savings as could be expected through the shared incentive/penalty contract.

Utilizing multiple contract strategies for vegetation management is generally the most cost effective. Performance based contracts are preferred for preventative maintenance type work but should be utilized in combination with other contract strategies to ensure overall program cost effectiveness. Firm price or unit price contracts are most effective for brush maintenance or herbicide treatment programs where the contractor can easily inspect and quantify the work volume. Competitive bidding of these work types ensures the contractor will provide the lowest unit price based on their estimated cost to complete the defined work scope and their known material costs (i.e. herbicide costs). T&M contracts (without incentives) offer the greatest level of flexibility to the utility in terms of being able to easily add or remove work scope and therefore are recommended for ticket type work. For the contractor, T&M minimizes their risk where work scope is variable or undefined as in Customer Trim Requests and Restoration type work. This allows the contractor to provide better pricing but shifts the burden to the utility to ensure that crews remain productive. Even so, T&M is generally considered the preferred method for these work types. A combination of all the contract strategies tailored toward specific work types, will offer the greatest potential for cost savings to the utility while minimizing the resources required to monitor contractor performance.

Well-documented inspection of completed work and establishment of clear standards are critical to achieving value from firm price or unit price contracts. Where clearance requirements may be variable due to customer concerns or in situations where work scope is not clearly defined (as with ticket work), T&M normally can provide a better value.

In recent years, the impacts of fuel price fluctuations have become a major concern for contractors as well for the utilities they work for. Concerns arise when contract rates are set at a time when fuel prices are at the extremes and then change dramatically over the life of the contract. This either leaves the
contractor with a windfall profit if fuel prices decrease (and the utility with higher costs) or can result in significant loss of profits for the contractor if fuel prices increase. Shorter contract periods (i.e. one-year) can minimize potential risk, but can be costly in terms of the cost to develop new contracts every year, and in terms of higher rates from contractors due to increased risk from shorter contract periods. Many utilities have elected to incorporate fuel escalators into their contracts to offset this concern.

The following are brief descriptions of the common contracting strategies:

**Time and Materials (T&M)**

T&M is normally the least risky for the contractor since most of the production-related risk is born by the utility. T&M contracts with performance measures and incentives tend to move some of the production risk back to the contractor. T&M often results in the highest work quality. Poor performance may subject a contractor to contract termination or result in assignment of “penalty points” as part of future bid evaluations. For work that is highly variable in nature, difficult to quantify in advance and where quality and customer relations are significant concerns, T&M may be the most desirable method.

**Unit Price**

Unit price work shifts production risk to the contractor but requires preplanning by the utility to designate which units the contractor should complete. Units are normally a tree trimmed, a square area of brush removed, footage cleared, or a tree removed by diameter classes. There is a natural incentive for the contractor to provide only the level of quality enforced by the utility. Consequently, quality control inspection by the utility is an important administrative requirement for this pricing strategy as well as work completion inspection. Administration of unit price contracts can become burdensome for utilities with high tree densities.

**Firm Price**

Firm price work also shifts production to the contractor but also shifts work unit selection to the contractor. The natural incentive in this pricing strategy is for the contractor to select the minimum acceptable units and provide the minimum acceptable quality. Post-work inspection by the utility is critical to assuring that all work was completed in compliance with the established specification. Tree removal is often an issue in a firm price contract since costs for tree removal can be highly variable. Consequently, trees to be removed are sometimes identified in advance as part of the bid package preparation. Alternatively, unit prices by size class for tree removal can be established or tree removal can be completed on a T&M basis for trees specifically authorized by the utility. Firm price is best suited to situations where the work can be clearly defined and understood by the bidders. It should also be limited to locations where there will be good competition by a number of bidders. Awarding of concurrent firm price contracts to multiple
contractors is desirable. Small firm price contracts bid to companies that do not have a local presence frequently results in higher pricing to cover the cost of per diems or personnel relocations necessary to establish a labor force.

**Turnkey and Incentive Based Contracts**

Turnkey pricing shifts the maximum risk from the utility to the turnkey service provider. This pricing strategy normally is accomplished by establishing incentives tied to accomplishment of specific objectives such as cost control, tree-related reliability targets, and customer relations. Because most of the program management responsibility is that of the contractor, it is critical that the utility closely monitor the performance objects through periodic review of key performance indicators. A variation of turnkey pricing is a management services contract with a third party management firm that administers contracts on behalf of the utility. The contracts for craft labor and equipment may continue to be with the utility or through the management company. The management services company may utilize any or all of the other pricing methods. This pricing strategy should be utilized if the utility has limited management resources or desires to totally overhaul existing systems, methods and practices.

**Target Pricing Strategy**

Target Pricing involves an efficient and effective use of combined customer notification and tree selection work planning that becomes a basis for establishment of Target Price for individual circuits or circuit segments. Documented workload in terms of tree pruning, tree removal and brush control units, multiplied by realistic costs per unit worked (based on work history by district) allows creation of the target price that contractors can be incented to meet or beat.

Using this system the line clearance contractor is paid on the basis of T&M rates as work progresses. Reconciliation of actual production cost compared to the Target Pricing occurs quarterly.

This strategy requires designation of specific work units and agreement from the line clearance contractors to work the units designated by the Work Planner. Work Plan packets are prepared and distributed to crews from a Work Planning database and populated through Work Planning data acquisition software. Line clearance crew time and production must be monitored and recorded in a production database.

A simplified example of a Target Pricing work sheet is illustrated in Table 10. Table 11 is an example of a simplified quarterly reconciliation table.
There are several requirements that must be in place for a Target Pricing strategy to be effective. They include:

1. Effective processes for work planning
2. A field data collection and work documentation system
3. Realistic production data by district or by characteristics such as maintained/unmaintained, accessible/inaccessible, overhang, etc.
4. Contracts with line clearance contractors that complement the Target Pricing strategy

Benefits of this strategy have included lower costs than firm priced or T&M bidding strategies. Because tree selection is closely aligned with utility goals, adequate reliability can be efficiently achieved.
Appendix B:
Transmission System
Vegetation Survey Form
Appendix C:
Recommended Industry Best Management Practice Strategies
Transmission owners need to develop practices that fulfill the requirements of the vegetation standard in a cost effective manner. These practices or strategies must be documented and consistently implemented. Over time, certain practices have been shown to be successful in preventing outages due to vegetation. Many of these practices were incorporated into the NERC Standard FAC-003 since the group that developed and approved the standard included experienced transmission vegetation managers. The American National Standards Institute (ANSI) has established standards for vegetation maintenance on transmission ROW\textsuperscript{14}. In addition, the International Society of Arboriculture (ISA) has issued a companion publication to ANSI A300 Part 7, Best Management Practices, Integrated Vegetation Management.\textsuperscript{15}

ECI proposes the following best practice work management recommendations as part of any successful transmission vegetation management program. The utilization of some or all of these work management tools and methods may already be in use at LG&E and KU and therefore, these recommendations in no way imply the current lack of appropriate procedures. The original scope of this workload study did not include a review of the transmission program procedures or strategies. The recommendations presented here should be considered for implementation by LG&E and KU if not already integrated into the existing management program.

- **Develop and keep current a vegetation management plan.** Even though the current NERC standard FAC-003 does not explicitly require a vegetation management plan (TVMP), a TVMP is an extremely valuable tool to plan and implement both short-term and long-term vegetation management goals. A TVMP is the “road map” for vegetation management and provided direction and overview of system goals. It details how the work will be determined, planned and executed and provides a framework on how vegetation management will be implemented to ensure the reliability of the system. Annual plans are a subset of multi-year long-range plans. A plan will aid in developing budgets and tracking the work performed on individual lines.

- **Develop and keep a current work schedule.** The TVMP will detail system and procedures for documenting and tracking the planned work. Plans are in need of constant update as work progresses. Updating will track work in progress and allow notice for any necessary adjustments.

- **Implement a system of inspecting planned work.** Documenting the inspection of completed work is also necessary to properly approve payment and ensure work reported as complete by the contractor meets


LG&E’s and KU’s expectations. Spot checks of completed work are commonly used with inspections of additional completed work when deficiencies are found. It is important to identify work that does not meet the standard early so that corrections can be made before more deficient work is completed. This will save time for both the utility and the contractor performing the work. Formal documentation of the work inspection is recommended.

- **Provide for consistent budgeting.** A consistent plan needs consistent funding. Budget reductions mid-year can cause workforce disruptions that increase future costs. Any changes to the established annual plan require documentation.

- **Establish and enforce work specifications.** The personnel performing the work must know exactly what is expected of them. The work inspector must know the specifications to properly enforce them. If future contract strategies are being considered, a clear, concise specification is required to communicate LG&E and KU vegetation maintenance goals to perspective contractors. The clearer the contract specification, the better the pricing from a perspective new contractor.

- **Develop action thresholds.** Develop a “clearance at time of maintenance” (clearance 1) distance and establish a minimum clearance threshold (clearance 2) that vegetation should never exceed. This threshold clearance will provide an additional margin of error to allow for vegetation growth, line sag and variations in maintenance cycles. Best practice utilities have developed an action threshold clearance value between Clearance 1 and Clearance 2 in order to have an intermediate point to take appropriate action to avoid violating the vegetation standard. Another type of action threshold relates to the maximum height that brush is allowed to attain to provide efficient and cost effective foliar application of herbicides. Since herbicide application is frequently less costly than mechanical clearing, it is important that brush is not allowed to grow taller than the maximum height 8-12 feet for effective herbicide use.

- **Develop a mitigation plan for exceptions/non-standard maintenance.** Keeping a record of locations where exceptions to standard practices exist is important to prevent outages or violations of LG&E’s and KU’s minimum acceptable clearance (between vegetation and conductors). An example would be where pruning is the only vegetation maintenance option allowed by the easement. The record should be specific as to the nature of the situation and regular inspection should be scheduled. Use of an automatic reminder system is recommended. Renegotiating or acquiring easements to eliminate clearance restrictions, payment for tree removal or replacing tall

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16 Brush is normally defined as immature (less than 10.2 cm or 4 inches in diameter), tall-growing tree species that would grow tall enough to interfere with conductors.
growing trees with compatible vegetation should be considered to eliminate the situation.

- **Develop standardized processes.** A uniform vegetation management plan for the entire LG&E and KU system that coincides with LG&E’s and KU’s current specification is key.

- **Implement an Integrated Vegetation Management program (IVM).** IVM is the art of controlling plant populations based on scientific principles from such fields as ecology, zoology and biology. Vegetation is managed to produce desired conditions (plant community density, structure and composition) and associated values consistent with stakeholder objectives on a sustainable basis. Stakeholders include both easement or fee holders, and all stakeholders and interested parties who may be influenced by IVM activities.

- **Manage the ROW by zones.** Managing the ROW in the zone immediately beneath the conductors differently from the rest of the ROW, known as the wire zone-border zone concept, is a successful approach to prevent outages in a cost effective manner (Figure 7), where sufficient ROW width is present. Different management techniques can be applied to these two zones and result in the many economic, operational and environmental benefits associated with the use of IVM techniques.

![Figure 7. Wire Zone / Border Zone Vegetation Management.](image)

- **Maintain the ROW edge.** Side pruning consists of pruning trees on the edge of the ROW. This work can be accomplished through the use of truck-mounted aerial lift equipment (bucket trucks), by manual climbing, or through the use of mechanical pruning equipment, such as a Jarraff, Aerial Saw, or similar tools.

- **Coordinate transmission work with related distribution work.** Occasionally distribution lines are found on the same ROW and even the same structures as a transmission line. Managing the vegetation simultaneously on both facilities can be cost effective. Problems can arise when different departments within the same company manage facilities with varying cycles, maintenance methods and budgets. The
transmission maintenance organization should take the lead in coordinating and ensuring that the work is completed because a transmission outage has greater consequences than a distribution outage.

In Integrated Vegetation Management (IVM), the selection of control options is based on effectiveness, site characteristics, environmental impacts, safety, and economics. Good vegetation management is based on an understanding of plants and their environment. A holistic approach considers the inter-relationship of plants, site, and species composition and growth rates.

IVM is recognized as an industry best practice, and it is therefore recommended that LG&E and KU adopt this strategy for the maintenance of undesirable brush on its transmission system. In general, this would be a combination of brushing, mechanical clearing (hydro-axe), and the use of herbicides to manage trees and bush on the LG&E and KU system.

Cutting deciduous brush without applying a follow-up herbicide application to the stump surface will permit the vegetation to re-sprout, thus requiring future maintenance. Trimming brush and/or allowing it to mature results in its becoming a more expensive and often permanent part of the workload. Trimming brush and the failure to use herbicides on cut stumps are not cost effective long term brush management techniques.

ECI recommends that LG&E and KU continue to remove trees with the ROW and ROW edge and treat the deciduous cut-stumps of trees and brush with appropriate herbicides whenever possible. LG&E and KU should continue to enforce the existing specifications for removal and stump treatment. This will prevent future expansion of the system vegetation workload and future line clearance cost increases.

On most of the LG&E and KU transmission system, there appears to be an opportunity to treat standing brush less than 8 - 12 feet tall with either foliar or basal herbicide applications, avoiding hand cutting. Taller standing dead brush can become a source of complaints, and taller brush can be difficult to control with foliar applications without risking exposure to off-target plants. This use of a basal bark-applied herbicide would be a particularly valuable tool in the removal of tall-growing tree species growing in sensitive areas or where there is concern for off-target damage.

Use of herbicides is essential if LG&E and KU is to maximize the benefits of mechanical clearing and brushing. Herbicide use is an important component of an IVM strategy. LG&E and KU should continue to enforce the specifications that require use of herbicides to treat stumps. The effectiveness of selective herbicide applications has been well documented through long-term studies on utility rights-of-way in the central and northeastern United States. Results from treatment simulation models developed through these studies project that sites dominated by deciduous species would nearly double in stem density by the end of two cycles if simply cut without a follow-up herbicide application (Figure 8). These same sites would be expected to
exhibit about a 50 percent reduction in stem density over the same time period if treated with a selective herbicide application.

Currently, herbicides are effectively used in the control of ROW vegetation. This is an integral part of any IVM program. An important consideration is that a herbicide program must be environmentally safe and professionally supervised to maintain public acceptance. Line clearance crews performing herbicide applications should receive proper training in species identification and herbicide application methods that are approved and deemed acceptable by the public and land owners.

It is recommended that LG&E and KU continue to pursue the selective use of herbicides (e.g., foliar and basal) for the management of communities of deciduous brush species as a part of IVM program. Utilizing contractors trained and experienced in the use of herbicides will ensure the continued success of the LG&E and KU vegetation management program.

Today's herbicides control tree/brush re-sprouting by blocking chemicals needed by plants to convert water, sunlight and nutrients into food for growth. Since these same chemicals are not present in animals and humans, the herbicides are very low in toxicity to people or animals. Without any food, the treated weed trees on the right-of-way wither and decompose. Treated stumps dry out and don’t re-sprout.
Safety for humans and the environment includes not causing adverse effects that are unacceptable. In this context, risk assessment is the process by which the likelihood of unacceptable adverse effects from the use of various methods of vegetation management can be determined.

An extensive report prepared by ECI provided the technical basis for and a summary of the risk to human health, wildlife and the environment from the use of 10 herbicides by a utility owner in the US. These herbicide uses included broadcast foliar, selective foliar, basal bark and cut stump applications. This assessment concluded that the margins of safety for herbicide use by the utility that commissioned the assessment were "adequate to assure protection of human health of workers and the general public."

ECI also completed an environmental impact statement resulting in the authorization of herbicides to control right-of-way vegetation in the LG&E and KU National Forest in Pennsylvania (US). Subsequent evaluation of herbicide use in the National Forest confirmed safe and effective use of foliar herbicides to control brush on utility right-of-way.

The human health risk assessment methodology used in these reports was the one generally recognized by the scientific community as necessary to characterize the potential adverse human health effects of chemicals in the environment. It is the same process used in judging the human health risk from cosmetics, food additives, pharmaceuticals, various household chemicals, and many other materials.

In the US, stump control herbicides are used not only by electric utilities, but also by numerous private and governmental wildlife habitat improvement organizations. Examples include:

- The Nature Conservancy on projects designed to limit the spread of invasive and non-native trees and shrubs. This would be similar to the efforts in the UK to eradicate the invasive plants Japanese Knotweed and Himalayan Balsam.

- Under the banner of a former organization called Project Habitat®, groups such as the National Wild Turkey Federation, Buckmasters, Butterfly Lovers International and Quail Unlimited have joined together to encourage utilities to implement an "Integrated Vegetation Management" (IVM) approach to maintaining utility easements that appropriately utilizes herbicides as a component in the control of right-of-way vegetation. They have recognized that environmental benefits of herbicides, when properly used, outweigh any adverse risk and are far more desirable than the alternatives to herbicide use, such as frequent mowing or hand cutting of undesirable trees.

Significant research has been undertaken over the past 30 years in the United States to document the impact of right-of-way herbicide use on the
environment, wildlife and management costs. Much of this research has been conducted by ECI and its university research associates. Stems per acre decrease over time through the use of herbicides, as does associated maintenance costs.

Brush control through the use of herbicides is an extremely cost effective maintenance tool. Figure 9 illustrates the successful use of herbicides and provides cost effective, environmentally acceptable and long-term brush control.

Figure 9. Example of good brush control through the use of herbicides.
Appendix D: Recommended Staffing to Contract Tree Crew Ratio
Need for Additional LG&E and KU Vegetation Maintenance Staffing

The vegetation maintenance program at LG&E and KU is sufficiently staffed to effect the administration of the current line clearance contracts and contractor staffing at the time of this review. The three ROW Coordinators manage 25 contract tree crews. As LG&E and KU adopts ECI’s budget and staffing recommendations additional contract crews will be added to the system manage the increase workload. Additional staff (in house or contracted) will be required to effectively manage the increased work force.

Figure 10 shows data from two benchmarking studies that evaluated the average number of line clearance crews supervised by utility arborists. In the Pennsylvania Electric Association (PEA) and Edison Electric Institute (EEI) studies, the average ratio of line clearance crews to each utility arborist was respectively 8 and 11 (Figure 10). However, in both studies 75 percent of the reporting utilities average 10 crews or less per supervising arborist. Figure 10 also shows that in a recent benchmarking study of over 20 utilities, the two overall best-in-class utilities have a ratio of approximately one utility arborist (including the system arborist) for every 6 line clearance crews. Figure 10 also compares the current crews supervised by the system forester to the anticipated ratio should seven-year cycle be adopted.

![Figure 10. Comparative Data on the Average Number of Line Clearance Crews Overseen by Utility Foresters](image)

Based on the anticipated increase in contractor tree crew staffing on the transmission system it is recommended that LG&E and KU establish an additional three Utility Forester positions (in-house or contract) to assist the ROW Coordinators in the day to day management of the program. If fully implemented, the LG&E and KU Transmission VM contractor tree crew work

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17 PEA = Data from a 7 utility survey conducted by the Pennsylvania Electric Association.  
EEI = Data from the Edison Electric Institute benchmark study of 29 utilities.  
ECI = Data from a 1998 benchmarking study of 22 North American utilities.
force will be approximately 72 crews for the first cycle. This will provide a ratio of approximately 12 crews per LG&E and KU vegetation management staffing. In order for the program recommendations to be implemented properly it has to be implemented correctly in the field. These three additional individuals will be primarily responsible for planning work and auditing the tree crews. They should also be capable of assisting the ROW Coordinators with any work that is appropriate for them to do. For example inspecting customer requests, work associated with new construction, supervising tree crews, and handling of customer complaints or refusals. After the completion of the first cycle, the number of tree crews is may decline, then staffing can be reduced to meet the need. The use of contract foresters would be an option for staffing these positions as they are more easily flexed.

The individuals should primarily be responsible for field implementation of the line clearance program and the evaluation of the line clearance crews and contractors within their area of responsibility. The Utility Foresters should report directly to the ROW Coordinators. This will provide a measure of control over individual interpretation of company guidelines and will ensure consistent implementation of appropriate work practices and operating procedures across the system. These positions will assist in ensuring contractor compliance to ANSI A-300 standards and that crews are properly instructed on the correct and safe use of herbicides. The position will audit contractor work to ensure that clearance requirements are met.

The Utility Foresters will assist in managing programs that provide ongoing information on field conditions, including tree crew production records (trees pruned removals, herbicide use, and brush treatment), electric service interruption data and conduct post-outage investigations.

The Utility Foresters should be trained in all aspects of utility vegetation management, including proper pruning techniques and herbicide use. The Utility Foresters should have a minimum of 2 years of experience in utility vegetation management, ISA certification and, preferably, a Bachelor’s Degree in Forestry or a related field. This will help to ensure consistent implementation of program policies and will enable the ROW Coordinators to effectively evaluate the work being completed by the line clearance crews.
Appendix

E: LG&E and KU Transmission System Benchmark Comparison
Figure 11: Percent of Utilities by NERC Reliability Region

- RFC: 10.0%
- SPP: 20.0%
- NPCC: 30.0%
- WECC: 20.0%
- SERC: 20.0%

Figure 12: Total Customers Served (in millions)

- LG&E and KU
- Utility A
- Utility B
- Utility C
- Utility E

Figure 13: Total Transmission Circuit and ROW Miles by Utility

- LG&E and KU: 5,827, 5,421
- Utility A: 3,027, 2,827
- Utility B: 2,586, 2,586
- Utility C: 2,241, 2,241
- Utility E: 1,411, 587

Figure 14: Percent of Utilities by Ownership Type

- Investor Owned Utilities (IOU): 100%

Figure 15: Transmission Program Attributes

- Utilities Regulated by a Public Utility or Service Commission(s) or other Agency(s):
  - Centralized VM Program: 100%
- VM Managed by Professional Forester or Arborist: 80%

Figure 16: Percent of Transmission Circuit Line Miles by Voltage Class
Cost Per Mile by Voltage (Non-Normalized)
Average 2007 - YTD 7/2010

Cost Per Mile by Voltage (Non-Normalized)
Average 2007 - YTD 7/2010

Normalized Total VM Program Expenditures Per OH System Asset Mile Excluding Admin Cost (2007-2009)

Normalized Total PM Maintenance Cost Per Mile Completed Excluding Admin Cost (2007-2009)

Normalized Cost Per Mile by Voltage
Average 2007 - YTD 7/2010

Normalized PM Cost per Mile by Contract Type
All Utilities
Average 2007 - YTD 7/2010

* Cost Normalized for Crew Rates, Brush, and Tree Density.
Figure 44

Number of NERC Violations
- Self Reported Clearance
- Non-Self Reported Clearance
- Other Non-Clearance

Figure 47

Tree to Conductor Clearance Standard
at Time of Pruning for <69 kV

Figure 45

Tree to Conductor Clearance Standard
at Time of Pruning for 69 kV

Figure 48

Tree to Conductor Clearance Standard
at Time of Pruning for 69 kV

Figure 46

Tree to Conductor Clearance Standard
at Time of Pruning for 138 kV

Figure 49

Tree to Conductor Clearance Standard
at Time of Pruning for 161 kV
<table>
<thead>
<tr>
<th>Tree Inventory System Capabilities</th>
<th>Utility A</th>
<th>Utility B</th>
<th>Utility C</th>
<th>Utility E</th>
</tr>
</thead>
<tbody>
<tr>
<td>Work Prescription and Estimating (Work Planning)</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Map, Manifest and Work Package Generation</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>GIS Tree Location Information</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Electronic Facility Asset Maps with Tree Inventory Overlay</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Cost Generation and Budgeting</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>QA/QC Audit and Inspection Tracking</td>
<td></td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Payment Processing</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Electronic Billing and Payment Processing</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Productivity Tracking and Analysis</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Reliability Tracking and Follow-Up Investigations</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Emergency Work and Restoration Management Coordination</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Figure 56**

**Percent of Utilities Using 100 Percent vs. Sampling to Determine Workload Estimates for Annual Plans and Contracts**

- Sample: 40%
- 100%
- Neither: 20%

**Figure 57**

**Percent of Utilities With Active QA/QC Program for Transmission Maintenance**

- Yes: 100%

**Figure 59**

**Percent of Tree Vendor Crews With AVL-GPS Vehicle Tracking**

- With
- Without

**Figure 58**

**Percent of Utilities With QA/QC Program which Includes Quality Management System (ISO:9001, etc.)**

- No: 100%

**Figure 60**
Do You Utilize or Have LiDAR Data for Transmission?

Do You Find the Data Easy to Manipulate and Use (i.e. System Tree Counts, etc.)?

<table>
<thead>
<tr>
<th>Utility</th>
<th>A</th>
<th>B</th>
<th>C</th>
<th>E</th>
<th>LG&amp;E and KU</th>
</tr>
</thead>
<tbody>
<tr>
<td>Y</td>
<td>Y</td>
<td>N</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
</tr>
</tbody>
</table>

Utility A
Utility B
Utility C
Utility E
LG&E and KU

Yes
No

80%
20%

Frequency of ROW Vegetation Inspection to Ensure Compliance With NERC FAC-003-1

<table>
<thead>
<tr>
<th>Utility</th>
<th>Frequency (in Months)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Utility A</td>
<td>12</td>
</tr>
<tr>
<td>Utility B</td>
<td>12</td>
</tr>
<tr>
<td>Utility C</td>
<td>12</td>
</tr>
<tr>
<td>Utility E</td>
<td>2</td>
</tr>
<tr>
<td>LG&amp;E and KU</td>
<td>2</td>
</tr>
</tbody>
</table>

Yes
No

60%
40%

Percentage of Utilities With Annual and Long Range (>= 5 Years) Vegetation Management Plans

Annual Plans?

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>80%</td>
<td>20%</td>
</tr>
</tbody>
</table>

Long-Range Plans?

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>60%</td>
<td>40%</td>
</tr>
</tbody>
</table>

Percent of Utilities Currently a Tree Line USA Utility

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>60%</td>
<td>40%</td>
</tr>
</tbody>
</table>
Q.1-32. Refer to page 15 of Mr. Malloy’s Direct Testimony wherein he describes the SAP upgrade in process for the Customer Care System. Please provide a copy of the Company’s business case and all cost/benefit analyses performed in conjunction with the decision to implement the upgrade.

A.1-32. See the attached Investment Proposal, which contains the cost-benefit analyses performed in conjunction with the decision to implement the upgrade.
Executive Summary

This Investment Committee proposal is to request approval of the SAP Upgrade project. The SAP Customer Care System ("CCS") is the customer information system platform providing meter to cash and customer service functions for LKS. The recommended alternative, “Upgrade with HANA”, consists of three primary deliverables utilizing a System Integrator (SI):

- Reimplementation of Customer Relationship Management (CRM), upgrading to version 7.3 (the front end where customer interaction occurs),
- Technical upgrade of Enterprise Core Component (ECC) to version 6.7 (the foundational application that supports customer billing, meter reading and accounting activities), and
- Implementation of SAP Suite (CRM and ECC) on HANA database platform.

The purpose of this initiative is to utilize the existing investment in the SAP customer platform to take advantage of new developments in more recent versions and place LKS on the standard, full service level agreement for the system. Also, by implementing this recommendation, LKS can take advantage of the SAP strategic roadmap for future innovations such as Advanced Metering Systems ("AMS") and Meter Data Management System ("MDMS").

The “Do Nothing” alternative was deemed unacceptable due to system support limitations, increased potential for security vulnerabilities, significant complexity and costs to meet evolving industry and customer experience requirements and additional IT maintenance to address integrating an aging application with more current systems and databases. The “Upgrade without HANA” alternative was not selected as it would leave LKS in a less than optimal position regarding future functionality and ongoing support.

The “Upgrade with HANA” recommended alternative is estimated at $27.1 million across 2016 and 2017 with a 12% contingency of $2.6 million. Contingency is based on all expenditures, except hardware and licensing, and is included to cover potential cost fluctuations, changes in estimates / durations of in-scope items and minor scope changes. A total of $26.7 million is included in the proposed 2016 Business Plan. A total of $23.0 million is included in the approved 2015BP. Approval of this recommendation will require $350K incremental funding over the proposed 2016 BP which will be addressed and allocated by the Corporate RAC.
This project is in compliance with the LKS IT Governance Principles to maintain fully supported information technologies and does not require separate filing with KPSC for approval.

Background

The SAP Customer Care System (CRM and ECC applications) was implemented in April 2009 with an initial capital investment of approximately $84 million. In addition, approximately $2.5-3.5 million in capital enhancements have been implemented annually since 2010. Since implementation, the Company has taken advantage of a common SAP platform allowing LKS to provide customers increased options through new rate structures, self-service offerings, and analytical capabilities to harmonize processes that benefit the customer experience. The goal is to upgrade to the most current stable CRM / ECC versions in order to continue maximizing the investment value through customer-focused functionality and extending the useful life of this asset. Below is a sampling of North American utilities utilizing SAP products.

<table>
<thead>
<tr>
<th>Version</th>
<th>Utility Name</th>
</tr>
</thead>
<tbody>
<tr>
<td>CRM 5.2</td>
<td>LKS</td>
</tr>
</tbody>
</table>

CRM and ECC are SAP packaged applications that require external support from SAP for maintenance and system upgrades. Missing or deferring these upgrades increases the risk of system failure, extends restoration and recovery windows, creates compatibility issues with interfacing systems and limits the opportunity to take advantage of improved performance and new customer-focused functionality.

- **Maintenance Support**

Since 2011, CRM 5.2 has been on Client Specific Maintenance, which is the only standard support option available for this version. It should be noted that LKS is the only SAP customer in North America still utilizing CRM 5.2. It is a limited option in that Client Specific Maintenance provides no Service Level Agreement (“SLA”) and, if there is not a known fix readily available to SAP, there is no guarantee of issue resolution. If a system failure occurs and cannot be resolved by LKS resources, LKS is completely dependent on the availability of qualified SAP resources on a time and materials basis.

If the CRM system became unavailable, Customer Representatives could not process customer requests such as moves, payment arrangements, and general inquiries about account(s). The customer interaction would be manually documented at that time and subsequently processed through the backend system. While payments could still be accepted, all disconnect for non-payment orders would be suspended since installment plans could not be established. Back office operations’ time increases as processing steps and research are more difficult without
CRM available. Additionally, if the CRM outage occurred for an extended period of time, a degradation in bill accuracy and performance metrics would occur.

- **Compatibility Issues**
  Running outdated versions of critical applications creates compatibility issues with interfacing applications (e.g., Genesys, GeoStan), internet browsers, databases and operating systems. Outdated versions also increase the potential for security vulnerabilities; thus, exposing LKS to new threats. Staying on aging applications creates additional IT maintenance activities to “back engineer” older versions to newer technologies increasing the risk of failures.

- **Improved Performance**
  The replication of data between the ECC and CRM databases is a significant operational and technical challenge LKS has faced since implementation. The data inconsistencies that are created between these systems impacts LKS's ability to interact effectively with customers. This replication issue has been significantly reduced in the proposed versions of ECC and CRM. This will enable LKS to take full advantage of new customer offerings, such as Customer Notifications, using the best available customer data.

  Suite on HANA provides inherent performance improvements that enhance system response time for the CRM application during customer interactions. This database platform also provides improved speed and accuracy of customer search capabilities, access to real-time data and predictive analytics.

- **New Functionality**
  Moving to the proposed application versions will provide the standard full service product support for core functionality from SAP; thereby, managing the long-term total cost of ownership and avoiding costly custom developments for new processes and functionality requirements.

  The proposed application versions will provide access to a technological platform for achieving LKS’s strategic objectives to enhance the customer experience utilizing the following capabilities:
  - Use of predictive analytics to effectively route customer communications to appropriate internal skill sets, providing the opportunity to increase first contact resolution.
  - Real-time analytics to provide management access to more timely data for insight to operational effectiveness
  - Standard AMS to avoid costly custom developments to replicate functionality
  - Potentially eliminate the need for a separate Meter Data Management System which is SAP’s direction for Suite on HANA.

- **Alternatives Considered (1 –Recommendation, 2 –Do nothing, 3 –Delay, 4 –Next Best Alt)**
  - **NOTE:** In order to more realistically reflect the future impacts of the three alternatives considered, the NPVRRR calculations below reflect the impacts of separate Automated Metering Systems and Meter Data Management implementations planned for 2019-2021. While separate initiatives, the decisions made on this upgrade directly impact the delivery and timing of these future projects.
1. **Recommendation:** Upgrade with HANA NPVRR: ($000s) $51,157
   The “Recommendation” includes CRM 7.3 and ECC 6.7 on HANA as described in the Background section.

2. **Do Nothing:**
   The “Do Nothing” alternative is unacceptable due to Client Specific Maintenance limitations, increased potential for security vulnerabilities, significant complexity and higher costs to meet evolving industry and customer experience requirements and additional IT maintenance to address integrating an aging application with more current systems and databases.

3. **Delay:** NPVRR: ($000s) $61,925
   The “Delay” alternative considers an implementation date of 2019, reflecting a delayed start of two years. This option exhibits the impacts of purchasing incremental support from SAP and regular capital enhancements that would be required prior to the project start date. This option is not recommended as it increases cost and does not address Client Specific Maintenance limitations as discussed above.

4. **Next Best Alternative(s): Upgrade w/o HANA** NPVRR: ($000s) $52,273
   The “Upgrade without HANA” alternative was evaluated during the RFP process and became a key discussion point regarding the strategic direction of SAP products. SAP, system integrators, and Gartner Inc. emphasized this is SAP’s direction and all future functionality will be built on this platform. Today, 350+ companies have implemented Suite on HANA across all industry groups with another 750+ implementations currently in progress. Although this option decreases the investment by $3.7 million compared to the recommendation, it will leave LKS in a less than optimal position regarding future functionality and ongoing support.

**Project Description**

- **Project Scope and Timeline**
  This project will upgrade ECC version 6.2 to version 6.7, re-implement CRM by upgrading from version 5.2 to 7.3, and implement the SAP Suite on HANA database platform. This project will establish a foundational platform for leveraging SAP industry developments in the future and provide Enterprise Level SAP support for the solution. Key milestone dates are shown below:

<table>
<thead>
<tr>
<th>Milestone Event</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>RFP Initiated for System Integrator</td>
<td>Jan 2015</td>
</tr>
<tr>
<td>Select System Integrator</td>
<td>Aug 2015</td>
</tr>
<tr>
<td>Project Approved by IC</td>
<td>Oct 2015</td>
</tr>
<tr>
<td>System Integrator Contract Awarded</td>
<td>Q4 2015</td>
</tr>
<tr>
<td>Project kickoff</td>
<td>Q1 2016</td>
</tr>
<tr>
<td>Implement into Production</td>
<td>Q2 2017</td>
</tr>
<tr>
<td>Post Go-Live Production Support Complete</td>
<td>Q3 2017</td>
</tr>
</tbody>
</table>

The current project estimate is 15 months. The go-live date of Q2 2017 is in compliance with PPL corporate policy “Managing Changes that Impact SOX Compliance” which discourages
systems’ installations or upgrades during the fourth quarter of a year or during the last month of a quarter.

- **Project Cost**
  The total cost of this project is $27.1 million. A contingency of 12% ($2.6 million) on all expenditure items (except hardware and licensing) is included for potential cost fluctuations, changes in estimates/durations of in-scope items and minor scope changes. Travel and expenses have been calculated and included in the project cost. The system integrator bid is time & materials.

<table>
<thead>
<tr>
<th>Expenditure Item</th>
<th>$000</th>
</tr>
</thead>
<tbody>
<tr>
<td>LKS Labor</td>
<td>8,219</td>
</tr>
<tr>
<td><strong>Contract Labor:</strong></td>
<td></td>
</tr>
<tr>
<td>• System Integrators, Third Party Vendors (includes expenses)</td>
<td>12,129</td>
</tr>
<tr>
<td>Software - SAP Licensing</td>
<td>725</td>
</tr>
<tr>
<td>Hardware</td>
<td>2,000</td>
</tr>
<tr>
<td>Other (travel, technical training, office expenses, misc.)</td>
<td>1,450</td>
</tr>
<tr>
<td><strong>Sub-Total</strong></td>
<td>24,523</td>
</tr>
<tr>
<td><strong>Contingency</strong> (12% of all costs except licensing and hardware)</td>
<td>2,574</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>27,097</td>
</tr>
</tbody>
</table>

**Economic Analysis and Risks**

- **Bid Summary**
### Budget Comparison and Financial Summary

#### Financial Detail by Year - Capital ($000s)

<table>
<thead>
<tr>
<th></th>
<th>2016</th>
<th>2017</th>
<th>2018</th>
<th>2019</th>
<th>2020</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Capital Investment Proposed</td>
<td>17,807</td>
<td>9,290</td>
<td>-</td>
<td>-</td>
<td>27,097</td>
<td></td>
</tr>
<tr>
<td>2. Cost of Removal Proposed</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>3. Total Capital and Removal Proposed (1+2)</td>
<td>17,807</td>
<td>9,290</td>
<td>-</td>
<td>-</td>
<td>27,097</td>
<td></td>
</tr>
<tr>
<td>4. Capital Investment 2015 BP</td>
<td>17,200</td>
<td>5,800</td>
<td>-</td>
<td>-</td>
<td>23,000</td>
<td></td>
</tr>
<tr>
<td>5. Cost of Removal 2015 BP</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>6. Total Capital and Removal 2015 BP (4+5)</td>
<td>17,200</td>
<td>5,800</td>
<td>-</td>
<td>-</td>
<td>23,000</td>
<td></td>
</tr>
<tr>
<td>7. Capital Investment variance to BP (4-1)</td>
<td>(607)</td>
<td>(3,490)</td>
<td>-</td>
<td>-</td>
<td>(4,097)</td>
<td></td>
</tr>
<tr>
<td>8. Cost of Removal variance to BP (5-2)</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td></td>
</tr>
<tr>
<td>9. Total Capital and Removal variance to BP (6-3)</td>
<td>(607)</td>
<td>(3,490)</td>
<td>-</td>
<td>-</td>
<td>(4,097)</td>
<td></td>
</tr>
</tbody>
</table>

#### Financial Detail by Year - O&M ($000s)

<table>
<thead>
<tr>
<th></th>
<th>2016</th>
<th>2017</th>
<th>2018</th>
<th>2019</th>
<th>2020</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Project O&amp;M Proposed</td>
<td>1,020</td>
<td>2,317</td>
<td>250</td>
<td>-</td>
<td>509</td>
<td>4,096</td>
</tr>
<tr>
<td>2. Project O&amp;M 2015 BP</td>
<td>776</td>
<td>2,070</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>2,846</td>
</tr>
<tr>
<td>3. Total Project O&amp;M variance to BP (2-1)</td>
<td>(244)</td>
<td>(247)</td>
<td>(250)</td>
<td>(509)</td>
<td>(1,250)</td>
<td></td>
</tr>
</tbody>
</table>

#### Financial Summary ($000s):

Discount Rate: 6.5%

Capital Breakdown:
- Labor: $8,219
- Contract Labor: $12,129
- Materials: $4,175
- Local Engineering: $0
- Burdens: $0
- Contingency: $2,574
- Reimbursements: ($0)

Net Capital Expenditure: $27,097

#### Financial Analysis - Project Summary ($000)

<table>
<thead>
<tr>
<th></th>
<th>2016</th>
<th>2017</th>
<th>2018</th>
<th>2019</th>
<th>2020</th>
<th>Life of Project</th>
</tr>
</thead>
<tbody>
<tr>
<td>Project Net Income</td>
<td>(997)</td>
<td>(1,142)</td>
<td>(313)</td>
<td>984</td>
<td>515</td>
<td>5,162</td>
</tr>
<tr>
<td>Project ROE</td>
<td>-21.10%</td>
<td>-10.00%</td>
<td>-2.50%</td>
<td>9.50%</td>
<td>5.70%</td>
<td>5.10%</td>
</tr>
</tbody>
</table>

By including SAP Suite on HANA in the scope of this project, internal capital related to future AMS and MDM projects is expected to decrease slightly over the 5 year planning cycle, and O&M IT costs are projected to increase due to license fees associated with SAP HANA software and hardware requirements. The existing level of capex is in the $2.5 - $3.5 million range.

Staying on CRM 5.2 will require ongoing support and development on an aging infrastructure that is moving away from the current core SAP functionality. Upgrading to CRM 7.3 will immediately increase core capabilities and establish the platform for future functionalities which
will be supported by the IT department through break/fix, enhancements and system maintenance and will include a roadmap for support pack and version improvements.

- **Assumptions**
  - Project approach is to perform a technical upgrade to ECC (6.2 to 6.7), reimplement CRM (5.2 to 7.3), and replace Oracle databases with HANA for both CRM and ECC. If CRM 7.4 or ECC 6.8 become available during Q1 2016, LKS and SI will evaluate the changes and make a determination on inclusion within the overall project scope.
  - Conversion of SAP BusinessWarehouse reporting to BI is not considered in scope and is being handled as part of the overall BI conversion effort.
  - Project hardware is to be purchased in Q1 2016.
  - Customer Services O&M was increased by $2.8 million in 2016 and 2017 to ensure sustained business / customer metric performance. This incremental budget is allocated in the proposed 2016 BP.
  - Customer Services resources (12 FTEs) will be added for 28 months and 14 FTEs will backfill positions assigned to the project.
  - Routine annual capex for CCS in 2016-17 is $2.5 – $3.5 million and will be avoided during the pending upgrade.
  - 2016 IT O&M increased $150k for Annual Maintenance on SAP Suite on HANA Licenses, which is being offset by $61k in reductions on other line items in the SAP annual license fee, for a net incremental cost of $89k.
  - The economic useful life will continue on a 10-year depreciation schedule.

- **Environmental**
  There are no environmental considerations for this project and Environmental Affairs is not required to sign-off on the project.

- **Risks**
  - **Proceed with upgrade to ECC 6.7 and Reimplementation of CRM to 7.3:**
    - Metrics – Actual impacts to long-term transaction processing times are unknown based on the current data available.
    - Change Management (Training) – Customer Services employees will be required to complete classroom, virtual, and eLearning training modules diverting those resources from day-to-day customer service tasks.
    - Change Management (Learning Curve) – New processes will result in a short-term dip in performance levels for all Customer Services areas and negatively impact operational metrics.
  - **Do Nothing or Delay upgrade to CRM 7.3**
    - Continued Deviation from Standard Functionality – Some industry specific functionality delivered in CRM 7.3 (e.g., AMS) would require costly and high-risk customizations in CRM 5.2.
    - Data Replication – Data replication issues will continue to impact data integrity.
    - System downtime – As CRM 5.2 continues to age and levels of support decrease, the potential for CRM to experience an extended downtime increases.
    - Future program requirements – As customer expectations and regulatory mandates increase, the need for advanced functionality increases significantly; “core code” modifications will likely be needed to meet emerging business needs, which significantly increases the risk of system failure.
• Compatibility with future operating systems and technology – Continuously “back engineering” older versions of IT applications increases support costs and risk of an extended outage.

• Emerging Vendor Technologies – Products of certified SAP partners and other vendors are limiting compatibility only to newer versions of SAP.

Conclusions and Recommendation
To continue as a leader in customer service and operational excellence, it is recommended LKS maximize the existing investment in the SAP customer platform and take advantage of new functionality and ongoing Enterprise level support by approving the SAP Upgrade to ECC 6.7, CRM 7.3 and Suite on HANA database platform. Investment Committee approval of this recommendation is requested for $27.1 million.
LOUISVILLE GAS AND ELECTRIC COMPANY

CASE NO. 2016-00371

Response to First Set of Data Requests of Kentucky Industrial Utility Customers, Inc. Dated January 11, 2017

Question No. 33

Responding Witness: John P. Malloy

Q.1-33. Please provide the increase or savings that the Company expects to achieve in IT O&M expense and customer care expense as the result of the upgrade. Provide the expenses before and after the upgrade for the test year. Provide all assumptions, data, and calculations, including all electronic spreadsheets with formulas intact.

A.1-33. As a result of the upgrade, the annual IT O&M expense related to the SAP customer care system is expected to increase by $107,313. See attachment 1 being provided in Excel format. This is related to license fees and associated hardware maintenance fees needed for the new HANA database which is part of the upgrade. HANA is SAP’s proprietary database platform; migrating to HANA is strategically important for continued use of SAP long-term. The upgrade will be implemented before the test year begins. The total SAP license fees in the test year are $624,373. See attachment 2 being provided in Excel format.
Response to First Set of Data Requests of
Kentucky Industrial Utility Customers, Inc.
Dated January 11, 2017

Question No. 34

Responding Witness: John P. Malloy

Q.1-34. Please provide the expected useful life of the CCS and the SAP upgrade, if different than for the CCS.

A.1-34. See the response to Question No. 9.
Question No. 35

Responding Witness: Lonnie E. Bellar

Q.1-35. Refer to page 20, lines 13-15, of Mr. Garrett’s Direct Testimony wherein he describes an annual increase of $10.7 million in steam and other generation maintenance expense due primarily to an increase in generation plant maintenance and outage expenses. Please provide a schedule showing the total company 2012, 2013, 2014, 2015, 2016, base year and test year maintenance expenses recorded or budgeted if not yet incurred for generation plant maintenance and outage expenses by plant/unit and by FERC O&M expense account.

A.1-35. See attached.
Plant/Unit
BROWN COMBUSTION TURBINE #6

BROWN COMBUSTION TURBINE #7

BROWN SOLAR FACILITY
CANAL
CANE RUN 4 - GENERATION

CANE RUN 5 - GENERATION

CANE RUN 6 - GENERATION

CANE RUN CC GT 2016

CANE RUN COMMON - GENERATION

CANE RUN GT11

E W BROWN COMBUSTION TURBINE UNIT 5

LGE GENERATION - COMMON
MILL CREEK 1 - GENERATION

MILL CREEK 2 - GENERATION

MILL CREEK 3 - GENERATION

FERC Account
551
552
553
554
551
552
553
554
554
552
554
510
511
512
513
514
510
511
512
513
514
510
511
512
513
514
551
552
553
554
510
511
514
552
553
554
551
552
553
554
510
510
511
512
513
514
510
511
512
513
514
510
511
512
513
514

2012
12,382
41,563
184,497
62,341
9,846
32,407
149,813
39,679
7,867
4,992
837,329
164,940
4,480,295
2,322,972
209,076
443,664
299,263
2,035,912
783,456
232,307
770,575
191,005
4,238,654
824,783
332,973
1,185
31,009
1,791
7,673
40,203
7,170
119,924
219,615
4,038,653
899,791
160,528
499,247
218,172
7,058,811
3,636,450
160,528
148,477
254,289
4,791,371
733,090
198,749

2013
10,438
48,988
117,169
29,671
8,336
34,194
11,383
25,125
4,549
1,200
340,382
150,797
1,789,243
715,931
178,668
378,203
279,008
2,720,422
781,823
198,520
542,090
180,351
2,854,239
1,021,112
284,545
5,040
21,582
2,480
583
3,027
19,825
13,544
393,599
207,774
7,701,724
3,971,556
139,865
101,298
244,015
3,828,597
344,543
139,865
451,498
237,840
9,227,327
1,554,910
173,290

2014
7,311
30,894
295,017
31,499
9,864
39,960
198,429
41,074
1,120
1,154
254,776
155,287
2,215,430
413,321
130,093
283,085
212,979
2,668,213
609,851
144,547
405,755
243,999
2,778,745
600,767
207,185
1,405
23,399
3,992
1,413
6,058
15,195
5,757
39,330
352,491
4,237,184
459,815
183,945
9,030
265,505
6,734,374
809,004
183,945
294,636
394,542
5,258,841
667,040
227,741

2015
4,488
23,850
233,353
18,401
4,478
22,751
11,800
15,591
1,106
110,248
71,636
671,161
199,009
3,335,173
129,900
59,769
1,086,451
125,285
4,182,033
172,977
52,997
341,341
80,760
439,097
12,291
38,560
107,398
539,797
68,432
1,158
3,715
20,799
55,278
54,152
710,479
419,369
6,871,243
874,612
205,489
678,553
347,233
5,193,138
1,250,434
205,489
351,624
456,962
7,125,334
737,850
254,415

2016
4,406
24,062
202,580
18,524
4,406
23,063
74,937
21,962
3,110
1,638
13,059
10,575
74,525
1,715
364
10,781
97,488
213,139
397,470
885,061
6
37,871
254
4,097
26,576
46,426
17,591
758,538
551,303
4,057,625
621,908
421,473
758,538
576,809
4,504,287
1,872,640
419,271
1,052,038
719,210
7,389,091
2,481,451
554,229

Base Year
6,611
10,379
100,403
10,148
4,991
9,422
35,158
7,804
2,234
897
8,830
10,575
120,131
1,712
364
(72)
114,983
150,357
61,818
497,170
15,606
(117,778)
15,117
1
35,232
132
4,838
13,715
18,368
5,780
388,988
197,383
2,836,940
638,569
213,826
388,988
208,361
3,181,772
2,619,027
211,859
594,501
268,608
5,654,458
2,350,819
266,110

Test Year
9,505
3,575
809,941
13,724
96,018
309,060
247,192
531,672
704,707
916,893
25,200
9,443
62,062
(1)
42,294
2,063,060
1,131,487
42,294
3,956,710
5,930,149
42,294
4,262,483
2,449,213
-

Attachment to Response to KIUC-1 Question 35
Page 1 of 2
Bellar


<table>
<thead>
<tr>
<th>Plant/Unit</th>
<th>FERC Account</th>
<th>2012</th>
<th>2013</th>
<th>2014</th>
<th>2015</th>
<th>2016</th>
<th>Base Year</th>
<th>Test Year</th>
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<td>263,034</td>
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<td>869,551</td>
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<td>7,740,023</td>
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<td>6,108,559</td>
<td>2,143,157</td>
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<td>1,431,607</td>
<td>1,953,090</td>
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<td>514</td>
<td>244,614</td>
<td>213,127</td>
<td>280,297</td>
<td>313,126</td>
<td>648,039</td>
<td>323,053</td>
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<tr>
<td>MILL CREEK-SO2 UNIT 1</td>
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<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>898,316</td>
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<td>512</td>
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<td>4,868,432</td>
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<td>-</td>
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<td>1,894,880</td>
<td>4,390,535</td>
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<td>MILL CREEK-SO2 UNIT 4</td>
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<td>-</td>
<td>-</td>
<td>794,547</td>
<td>230,916</td>
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<tr>
<td>PADDYS RUN GT 11</td>
<td>551</td>
<td>2,566</td>
<td>1,253</td>
<td>1,153</td>
<td>-</td>
<td>239,239</td>
<td>826,466</td>
<td>25,426</td>
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<tr>
<td>PADDYS RUN GT 12</td>
<td>553</td>
<td>23,186</td>
<td>105,597</td>
<td>29,713</td>
<td>15,197</td>
<td>13,329</td>
<td>128,264</td>
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<td>TRIMBLE COUNTY #10 COMBUSTION TURBINE</td>
<td>553</td>
<td>24,759</td>
<td>105,597</td>
<td>29,713</td>
<td>15,197</td>
<td>13,329</td>
<td>128,264</td>
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</tr>
<tr>
<td>TRIMBLE COUNTY #5 - #10 COMBUSTION TURBINE - COMMON</td>
<td>553</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td></td>
</tr>
<tr>
<td>TRIMBLE COUNTY #5 AND 6 COMBUSTION TURBINE - COMMON</td>
<td>553</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
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<tr>
<td>TRIMBLE COUNTY #8 COMBUSTION TURBINE</td>
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<td>40,730</td>
<td>73,621</td>
<td>57,436</td>
<td>54,897</td>
<td>21,454</td>
<td>128,264</td>
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</tr>
<tr>
<td>TRIMBLE COUNTY 1 - GENERATION</td>
<td>510</td>
<td>724,749</td>
<td>592,031</td>
<td>706,957</td>
<td>658,481</td>
<td>797,738</td>
<td>782,634</td>
<td>1,681,217</td>
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<td>TRIMBLE COUNTY 1 CLEARING ACCTNG</td>
<td>510</td>
<td>(36,681)</td>
<td>(27,646)</td>
<td>(48,112)</td>
<td>(34,590)</td>
<td>(68,576)</td>
<td>(53,309)</td>
<td>(62,340)</td>
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<tr>
<td>TRIMBLE COUNTY 2 CLEARING ACCTNG</td>
<td>510</td>
<td>(303,081)</td>
<td>(417,225)</td>
<td>(547,794)</td>
<td>(410,502)</td>
<td>(462,734)</td>
<td>(327,697)</td>
<td>(350,970)</td>
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<tr>
<td>TRIMBLE COUNTY 2 CLEANSING ACCTNG</td>
<td>510</td>
<td>(79,898)</td>
<td>(58,244)</td>
<td>(77,938)</td>
<td>(52,962)</td>
<td>(126,635)</td>
<td>(117,631)</td>
<td>(53,179)</td>
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<tr>
<td>TRIMBLE COUNTY 2 - GENERATION</td>
<td>510</td>
<td>146,723</td>
<td>110,583</td>
<td>192,444</td>
<td>138,359</td>
<td>274,302</td>
<td>45,526</td>
<td>(771,325)</td>
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<td>TRIMBLE COUNTY 3 - 25% PORTION N/A</td>
<td>510</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td></td>
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<tr>
<td>TRIMBLE COUNTY 4 - GENERATION</td>
<td>510</td>
<td>282,027</td>
<td>181,382</td>
<td>199,726</td>
<td>226,187</td>
<td>219,561</td>
<td>412,839</td>
<td>1,260,110</td>
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<tr>
<td>ZORN</td>
<td>553</td>
<td>99,695</td>
<td>14,491</td>
<td>18,764</td>
<td>22,714</td>
<td>4,972</td>
<td>4,972</td>
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</tr>
</tbody>
</table>

**Note:** The table contains a list of plant units with their respective financial and operational data for different years and accounts.
Q.1-36. Please describe how the Company removed the effects of purchase accounting from the capitalization, all rate base components, and all related expenses, such as depreciation expense and property tax expense, reflected in the filing. Provide a schedule in electronic spreadsheet format with all formulas intact showing all adjustments and providing an explanation of each such adjustment.

A.1-36. The Company maintains a separate general ledger and a separate budget entity to record the impact of all purchase accounting adjustments and to ensure that the activity can be tracked for reporting and budgeting purposes. When calculating capitalization, all rate base components and all related expenses, the Company used only the general ledger and budget entity excluding purchase accounting. As a result, there was no adjustment needed to remove purchase accounting included in the capitalization, rate base components, or all related expenses.
Q.1-37. Please provide a schedule showing all direct assignments and allocations of costs from LKS to the Company by FERC O&M, A&G, and each other account for 2012, 2013, 2014, 2015, 2016, the base year, and the test year. Provide an explanation for each increase from year to year of at least $1 million or 5%, whichever is less.

A.1-37. See attached.

Changes from year to year are explained for increases greater than $1 million.
<table>
<thead>
<tr>
<th>FERC Account</th>
<th>FERC Account Description</th>
<th>2012</th>
</tr>
</thead>
<tbody>
<tr>
<td>107</td>
<td>Construction Work In Progress</td>
<td>Direct Assignments</td>
</tr>
<tr>
<td></td>
<td></td>
<td>25,593,763</td>
</tr>
<tr>
<td>108</td>
<td>Accumulated Provision For Depreciation Of Utility Plant</td>
<td>179,737</td>
</tr>
<tr>
<td>131</td>
<td>Cash</td>
<td>(1,127,829)</td>
</tr>
<tr>
<td>143</td>
<td>Other Accounts Receivable</td>
<td>56,128</td>
</tr>
<tr>
<td>146</td>
<td>Accounts Receivable From Associated Companies</td>
<td>(135,250)</td>
</tr>
<tr>
<td>151</td>
<td>Fuel Stock</td>
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</tr>
<tr>
<td>163</td>
<td>Stores Expense Undistributed</td>
<td>239,491</td>
</tr>
<tr>
<td>165</td>
<td>Prepayments</td>
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<tr>
<td>182.3</td>
<td>Other Regulatory Assets</td>
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<tr>
<td>183</td>
<td>Preliminary Survey And Investigation Charges</td>
<td>346,863</td>
</tr>
<tr>
<td>184</td>
<td>Clearing Accounts</td>
<td>23,329,599</td>
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<tr>
<td>186</td>
<td>Miscellaneous Deferred Debits</td>
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</tr>
<tr>
<td>188</td>
<td>Research, Development And Demonstration Expenses</td>
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<td>228.3</td>
<td>Accumulated Provision For Pensions And Benefits</td>
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### FERC Account Descriptions

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<th>FERC Account Description</th>
<th>2012 Direct Assignments</th>
<th>Indirect Allocations of Costs</th>
<th>Total</th>
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<td>186,349</td>
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<td>234</td>
<td>Accounts Payable To Associated Companies</td>
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<td>-</td>
<td>-</td>
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<tr>
<td>236</td>
<td>Taxes Accrued</td>
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<td>(671,390)</td>
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<td>241</td>
<td>Tax Collections Payable</td>
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<td>242</td>
<td>Miscellaneous Current And Accrued Liabilities</td>
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<tr>
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<td>Operating Revenues</td>
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<td>Taxes Other Than Income Taxes, Utility Operating Income</td>
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<tr>
<td>416</td>
<td>Cost And Expenses Of Merchandising, Jobbing And Contract Work</td>
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<td>418</td>
<td>Nonoperating Rental Income</td>
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<td>419</td>
<td>Interest And Dividend Income</td>
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FROM THE SERVICE COMPANY (LKS)  

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Attachment to Response to KIUC-1 Question No. 37

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FROM THE SERVICE COMPANY (LKS)

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| 910          | Miscellaneous Customer Service And Informational Expenses | |                |                              |       |
| 912          | Demonstrating And Selling Expenses              |      |                    |                              |       |
| 913          | Advertising Expenses                            | 1,823 |                    | 1,823                        |
| 920          | Administrative And General Salaries             | 2,411,165 | 18,324,357      | 20,735,522                    |</p>
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Attachment to Response to KIUC-1 Question No. 37
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Attachment to Response to KIUC-1 Question No. 37
9 of 49
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<td>Miscellaneous Customer Service And Informational Expenses</td>
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<td>213,556</td>
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<td>(1,823)</td>
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<td>Administrative And General Salaries</td>
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<td>23,246,310</td>
<td>25,287,730</td>
<td>4,552,208</td>
<td>Primarily due to a change in account number charged by IT employees (offset in Account 935 below); and annual wage increases.</td>
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<td>Office Supplies And Expenses</td>
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<td>Primarily due to a change in account number charged by IT employees (offset in Account 935 below).</td>
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<td>Employee Pensions And Benefits</td>
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<td>166,555</td>
<td>16,619,630</td>
<td>1,464,776</td>
<td>Increased pension and medical insurance costs.</td>
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<td>Regulatory Commission Expenses</td>
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Primarily due to a change in account number charged by IT employees (offset in Account 935 below).
## BILLED TO LOUISVILLE GAS AND ELECTRIC COMPANY (LG&E)
FROM THE SERVICE COMPANY (LKS)

<table>
<thead>
<tr>
<th>FERC Account</th>
<th>FERC Account Description</th>
<th>Direct Assignments</th>
<th>Indirect Allocations of Costs</th>
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<th>Variance Amount</th>
<th>Explanation</th>
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<td>931</td>
<td>Rents</td>
<td>(196)</td>
<td>202,624</td>
<td>202,428</td>
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<td>Grand Total</td>
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Variance 2013 to 2012

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<table>
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<th>FERC Account</th>
<th>FERC Account Description</th>
<th>Direct Assignments</th>
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<th>Variance Amount</th>
<th>Explanation</th>
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<td>Construction Work In Progress</td>
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<td>Accumulated Provision For Depreciation Of Utility Plant</td>
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<td>Slightly higher coal prices and higher reagent prices and volumes.</td>
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<td>Research, Development And Demonstration Expenses</td>
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<td>Assignments</td>
<td>Allocations</td>
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<td>Amount</td>
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<td>(545,762)</td>
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<td>159,808</td>
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Attachment to Response to KIUC-1 Question No. 37
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### FERC Account Description

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<td>Maintenance Of Generating And Electric Equipment</td>
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<td>Load Dispatch-Reliability</td>
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<td>Load Dispatch-Monitor And Operate Transmission System</td>
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<td>Load Dispatch-Transmission Service And Scheduling</td>
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<td>Reliability, Planning And Standards Development</td>
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### Maintenance Of Miscellaneous Transmission Plant

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<td>580</td>
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<td>Load Dispatching</td>
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Attachment to Response to KIUC-1 Question No. 37

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<table>
<thead>
<tr>
<th>FERC Account</th>
<th>FERC Account Description</th>
<th>2014 Direct Assignments</th>
<th>Indirect Allocations of Costs</th>
<th>Total</th>
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<th>Explanation</th>
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*Primarily due to a change in account number charged by IT employees (offset in Account 935 below); and annual wage increases.*
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<td>148,050</td>
<td>41</td>
</tr>
</tbody>
</table>
## 512 Maintenance Of Boiler Plant
- **Direct Assignments**: 181,627
- **Indirect Assignments**: 1,641
- **Total**: 183,269
- **Variance 2015 to 2014**: 128,814

## 513 Maintenance Of Electric Plant
- **Direct Assignments**: 83,551
- **Indirect Assignments**: 119,636
- **Total**: 203,187
- **Variance 2015 to 2014**: (237,688)

## 514 Maintenance Of Miscellaneous Steam Plant
- **Direct Assignments**: 69,722
- **Indirect Assignments**: 1,412
- **Total**: 71,133
- **Variance 2015 to 2014**: 64,807

## 535 Operation Supervision And Engineering
- **Direct Assignments**: -
- **Indirect Assignments**: -
- **Total**: -
- **Variance 2015 to 2014**: -

## 538 Electric Expenses
- **Direct Assignments**: -
- **Indirect Assignments**: -
- **Total**: -
- **Variance 2015 to 2014**: -

## 539 Miscellaneous Hydraulic Power Generation Expenses
- **Direct Assignments**: 1,389
- **Indirect Assignments**: -
- **Total**: 1,389
- **Variance 2015 to 2014**: (9,202)

## 541 Maintenance Supervision And Engineering
- **Direct Assignments**: -
- **Indirect Assignments**: -
- **Total**: -
- **Variance 2015 to 2014**: -

## 542 Maintenance Of Structures
- **Direct Assignments**: 3,216
- **Indirect Assignments**: -
- **Total**: 3,216
- **Variance 2015 to 2014**: (6,697)

## 543 Maintenance Of Reservoirs, Dams And Waterways
- **Direct Assignments**: -
- **Indirect Assignments**: -
- **Total**: -
- **Variance 2015 to 2014**: -

## 544 Maintenance Of Electric Plant
- **Direct Assignments**: 3,694
- **Indirect Assignments**: 11
- **Total**: 3,705
- **Variance 2015 to 2014**: 3,371

## 545 Maintenance Of Miscellaneous Hydraulic Plant
- **Direct Assignments**: 11,483
- **Indirect Assignments**: -
- **Total**: 11,483
- **Variance 2015 to 2014**: 11,483

## 546 Operation Supervision And Engineering
- **Direct Assignments**: 1,686
- **Indirect Assignments**: -
- **Total**: 1,686
- **Variance 2015 to 2014**: 1,686

## 548 Generation Expenses
- **Direct Assignments**: -
- **Indirect Assignments**: -
- **Total**: -
- **Variance 2015 to 2014**: (4,800)

## 549 Miscellaneous Other Power Generation Expenses
- **Direct Assignments**: 25,398
- **Indirect Assignments**: -
- **Total**: 25,398
- **Variance 2015 to 2014**: 25,398

## 549 Maintenance Supervision And Engineering
- **Direct Assignments**: -
- **Indirect Assignments**: -
- **Total**: -
- **Variance 2015 to 2014**: -

## 552 Maintenance Of Structures
- **Direct Assignments**: 2,395
- **Indirect Assignments**: -
- **Total**: 2,395
- **Variance 2015 to 2014**: 2,395

## 553 Maintenance Of Generating And Electric Equipment
- **Direct Assignments**: 13,960
- **Indirect Assignments**: 2
- **Total**: 13,962
- **Variance 2015 to 2014**: 13,097

## 554 Maintenance Of Miscellaneous Other Power Generation Plant
- **Direct Assignments**: 21,441
- **Indirect Assignments**: -
- **Total**: 21,441
- **Variance 2015 to 2014**: 19,852

## 556 System Control And Load Dispatching
- **Direct Assignments**: 45
- **Indirect Assignments**: 1,288,620
- **Total**: 1,288,665
- **Variance 2015 to 2014**: (83,825)

## 560 Operation Supervision And Engineering
- **Direct Assignments**: (20,282)
- **Indirect Assignments**: 908,171
- **Total**: 887,889
- **Variance 2015 to 2014**: 33,219

## 561.1 Load Dispatch-Reliability
- **Direct Assignments**: -
- **Indirect Assignments**: 275,985
- **Total**: 275,985
- **Variance 2015 to 2014**: (1,250,424)

## 562 Load Dispatch-Monitor And Operate Transmission System
- **Direct Assignments**: -
- **Indirect Assignments**: 1,056,581
- **Total**: 1,056,581
- **Variance 2015 to 2014**: 920,214

## 563 Load Dispatch-Transmission Service And Scheduling
- **Direct Assignments**: -
- **Indirect Assignments**: 364,301
- **Total**: 364,301
- **Variance 2015 to 2014**: 287,420

## 565 Reliability, Planning And Standards Development
- **Direct Assignments**: -
- **Indirect Assignments**: 461,839
- **Total**: 461,839
- **Variance 2015 to 2014**: 6,871

## 566 Transmission Service Studies
- **Direct Assignments**: 1,102
- **Indirect Assignments**: 2,751
- **Total**: 3,853
- **Variance 2015 to 2014**: (6,105)

## 567 Station Expenses
- **Direct Assignments**: 45,078
- **Indirect Assignments**: 2,210
- **Total**: 47,288
- **Variance 2015 to 2014**: 19,981

## 569 Maintenance Of Structures
- **Direct Assignments**: -
- **Indirect Assignments**: -
- **Total**: -
- **Variance 2015 to 2014**: -

## 570 Maintenance Of Station Equipment
- **Direct Assignments**: 13,960
- **Indirect Assignments**: 10
- **Total**: 13,961
- **Variance 2015 to 2014**: 13,097

## 571 Maintenance Of Overhead Lines
- **Direct Assignments**: -
- **Indirect Assignments**: -
- **Total**: -
- **Variance 2015 to 2014**: -

## 572 Maintenance Of Miscellaneous Transmission Plant
- **Direct Assignments**: 90,904
- **Indirect Assignments**: 148,723
- **Total**: 239,627
- **Variance 2015 to 2014**: 148,227

## 580 Operation Supervision And Engineering
- **Direct Assignments**: 175,033
- **Indirect Assignments**: 745,418
- **Total**: 920,551
- **Variance 2015 to 2014**: 150,657

## 581 Load Dispatching
- **Direct Assignments**: 561,425
- **Indirect Assignments**: 184,082
- **Total**: 745,507
- **Variance 2015 to 2014**: 34,302
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<th>Variance 2015 to 2014</th>
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<td>System Control And Load Dispatching</td>
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<td>Measuring And Regulating Station Expenses-Industrial</td>
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<td>Measuring And Regulating Station Expenses-City Gate Check Stations</td>
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<td>Meter And House Regulator Expenses</td>
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<td>Maintenance Of Structures And Improvements</td>
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<td>Maintenance Of Mains</td>
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<td>Maintenance Of Measuring And Regulating Station Equipment-General</td>
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<td>Maintenance Of Measuring And Regulating Station Equipment-Industrial</td>
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<td>Maintenance Of Measuring And Regulating Station Equipment-City Gate Check Stations</td>
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<td>Maintenance Of Meters And House Regulators</td>
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<td>Uncollectible Accounts</td>
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<td>Customer Assistance Expenses</td>
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<td>909</td>
<td>Informational And Instructional Advertising Expenses</td>
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<td>910</td>
<td>Miscellaneous Customer Service And Informational Expenses</td>
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<td>Demonstrating And Selling Expenses</td>
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<td>Advertising Expenses</td>
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<tr>
<td>920</td>
<td>Administrative And General Salaries</td>
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<td>243,356</td>
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</table>

909 Informational And Instructional Advertising Expenses: 740,684 63,373 804,057 345,829
910 Miscellaneous Customer Service And Informational Expenses: 142,710 388,745 531,455 (24,394)
912 Demonstrating And Selling Expenses: 752,148 3,211 755,359 692,739
920 Administrative And General Salaries: 2,033,400 30,358,703 32,392,103 1,979,114

Primarily due to annual wage increases, increased IT and Customer Services headcount, and charges previously made to other accounts (offset above).
<table>
<thead>
<tr>
<th>FERC Account</th>
<th>FERC Account Description</th>
<th>2015 Direct Assignments</th>
<th>2015 Indirect Allocations of Costs</th>
<th>2015 Total</th>
<th>Variance Amount</th>
<th>Explanation</th>
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<tbody>
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<td>Office Supplies And Expenses</td>
<td>676,380</td>
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<td>Injuries And Damages</td>
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<td>165,778</td>
<td>197,220</td>
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<td>Employee Pensions And Benefits</td>
<td>14,990,209</td>
<td>2,558,487</td>
<td>17,548,695</td>
<td>4,567,818</td>
<td>Primarily due to an increase in employee pensions (due to change in mortality table and reduced expected return on assets) and medical expenses.</td>
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<td>General Advertising Expenses</td>
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<td>Primarily due to an increase in research and development expenses.</td>
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<td>2015 to 2014</td>
<td>Variance Amount</td>
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<td>13,368,644</td>
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<td>Increases due primarily to IT projects (Customer Care System upgrade, license agreements for storage and data backup systems, mobile radio dispatch system replacement) offset by lower environmental compliance spending.</td>
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<td>Primarily due to prepaid contracts for information technology. Prior to June 2016 the IT prepaid balance was held on LKS. Starting in June 2016 the prepayments made by LKS on behalf of LG&amp;E were moved to LG&amp;E.</td>
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Attachment to Response to KIUC-1 Question No. 37
29 of 49
Scott
### FERC Account Summary

<table>
<thead>
<tr>
<th>FERC Account</th>
<th>FERC Account Description</th>
<th>2016 Direct Assignments</th>
<th>2016 Indirect Allocations of Costs</th>
<th>2016 Total</th>
<th>Variance 2016 to 2015</th>
<th>Explanation</th>
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**Attachment to Response to** KIUC-1 Question No. 37  
30 of 49  
Scott
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Attachment to Response to KIUC-1 Question No. 37

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Scott
### FERC Account and Description

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<td>876</td>
<td>Measuring And Regulating Station Expenses-Industrial</td>
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<td>Measuring And Regulating Station Expenses-City Gate Check Stations</td>
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The majority of the change is related to costs recovered through the DSM mechanism.
<table>
<thead>
<tr>
<th>FERC Account</th>
<th>FERC Account Description</th>
<th>2016 Direct Assignments</th>
<th>2016 Indirect Allocations of Costs</th>
<th>Total</th>
<th>Variance Amount</th>
<th>Explanation</th>
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<tbody>
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<td>235,903</td>
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<td>2,390,236</td>
<td>2,193,016</td>
<td>Primarily due to a convenience payment for a legal settlement.</td>
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<td>2016 Direct Assignments</td>
<td>Indirect Allocations of Costs</td>
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<td>Variance Amount</td>
<td>Explanation</td>
</tr>
<tr>
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<td>Indirect Allocations of Costs</td>
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<td>Explanation</td>
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<td>(267,692)</td>
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<td>Actual dollars presented for calendar year 2014 through 2016 include convenience payments.¹</td>
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¹ Actual dollars presented for calendar year 2014 through 2016 include convenience payments.
### Table: FERC Account Information

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<tr>
<th>FERC Account</th>
<th>FERC Account Description</th>
<th>Direct Assignments</th>
<th>Indirect Allocations of Costs</th>
<th>Total</th>
<th>Variance Base Year to 2016</th>
<th>Explanation</th>
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*Vegetation management charges are budgeted to be paid by LKS, but most of the actual changes are directly paid by LG&E.*
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The majority of the change is related to costs recovered through the DSM mechanism.
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<td>930.2</td>
<td>Miscellaneous General Expenses</td>
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<td>Base Year(^1)</td>
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<td>931</td>
<td>Rents</td>
<td>Direct Assignments: 89,892</td>
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<td>Indirect Allocations of Costs: 1,219,137</td>
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<td>Maintenance Of General Plant</td>
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<td>336,356</td>
<td>(252,874)</td>
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<td>Grand Total</td>
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<td>39,849,819</td>
<td>168,948,022</td>
<td>208,797,841</td>
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\(^1\)Actual dollars presented for calendar year 2012 through 2016 include convenience payments. A convenience payment occurs when one affiliate, as a matter of convenience for the vendor, makes a payment on behalf of other affiliates and is subsequently reimbursed by those affiliates. Convenience payments (including, but not limited to, fuel purchases, reagent purchases, medical claims and pension funding) are excluded from the base period and the forecasted test period.
<table>
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<td>94,365,500</td>
<td>56,392,530 Primarily due to implementation of an Advanced Metering System,</td>
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<td>Accumulated Provision For Depreciation Of Utility Plant</td>
<td>-</td>
<td>66,976</td>
<td>(683,095)</td>
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<tr>
<td>131</td>
<td>Cash</td>
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<td>143</td>
<td>Other Accounts Receivable</td>
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<td>146</td>
<td>Accounts Receivable From Associated Companies</td>
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<tr>
<td>151</td>
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<td>163</td>
<td>Stores Expense Undistributed</td>
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<td>165</td>
<td>Prepayments</td>
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<td>Other Regulatory Assets</td>
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<td>183</td>
<td>Preliminary Survey And Investigation Charges</td>
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<td>Clearing Accounts</td>
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<td>Miscellaneous Deferred Debits</td>
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<td>188</td>
<td>Research, Development And Demonstration Expenses</td>
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<td>(170,404)</td>
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<td>Accumulated Provision For Pensions And Benefits</td>
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### BILLED TO LOUISVILLE GAS AND ELECTRIC COMPANY (LG&E)
FROM THE SERVICE COMPANY (LKS)

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<th>Allocations of Costs</th>
<th>Total</th>
<th>Variance Test Year to Base Year</th>
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<td>Taxes Accrued</td>
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<td>Tax Collections Payable</td>
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<td>Miscellaneous Current And Accrued Liabilities</td>
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<td>Other Deferred Credits</td>
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<td>Interest And Dividend Income</td>
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<td>421</td>
<td>Miscellaneous Nonoperating Income</td>
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<td>Rent From Electric Property</td>
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<td>Other Electric Revenues</td>
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<td>Rent From Gas Property</td>
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<tr>
<td>511</td>
<td>Maintenance Of Structures</td>
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</table>

**Explanation:**
- **Variance Amount:** The difference between the test year and base year values.
- **Explanation:** The reason for the variance.
<table>
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<tr>
<th>FERC Account</th>
<th>FERC Account Description</th>
<th>Test Year</th>
<th>Variance Test Year to Base Year</th>
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<td>Miscellaneous Hydraulic Power Generation Expenses</td>
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<td>Load Dispatch-Transmission Service And Scheduling</td>
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<td>561.6</td>
<td>Transmission Service Studies</td>
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<td>Overhead Line Expenses</td>
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<td>Miscellaneous Transmission Expenses</td>
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<td>Load Dispatching</td>
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</table>

Vegetation management charges are budgeted to be paid by LKS, but most of the actual charges in the Base year were directly paid by LG&E.
<table>
<thead>
<tr>
<th>FERC Account</th>
<th>FERC Account Description</th>
<th>Test Year</th>
<th>Variance Test Year to Base Year</th>
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<td>Street Lighting And Signal System Expenses</td>
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<td>Customer Installations Expenses</td>
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<td>Maintenance Of Station Equipment</td>
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Attachment to Response to KIUC-1 Question No. 37
46 of 49
Scott
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Attachment to Response to KIUC-1 Question No. 37
47 of 49
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<td>Prepaid insurance amortization was budgeted as an affiliate charge for the test year, but only for two months of the base year.</td>
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<td>Primarily due to a decrease in the pension discount rate, medical cost inflation, higher headcount, and higher 401K due to increased wages and headcount.</td>
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Prepared by [Name]
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1Actual dollars presented for calendar year 2012 through 2016 include convenience payments. A convenience payment occurs when one affiliate, as a matter of convenience for the vendor, makes a payment on behalf of other affiliates and is subsequently reimbursed by those affiliates. Convenience payments (including, but not limited to, fuel purchases, reagent purchases, medical claims and pension funding) are excluded from the base period and the forecasted test period.
LOUISVILLE GAS AND ELECTRIC COMPANY

CASE NO. 2016-00371

Response to First Set of Data Requests of
Kentucky Industrial Utility Customers, Inc.
Dated January 11, 2017

Question No. 38

Responding Witness: Adrien M. McKenzie

Q.1-38. Please provide all work papers and supporting documentation used by Mr. McKenzie in the preparation of his Direct Testimony and Exhibits. Please provide all spreadsheets with cell formulas intact. Please include all exhibits in native spreadsheets with cell formulas intact.

A.1-38. The work papers and support documentation requested are provided in AG 1-282. See the response to PSC 1-54 for the Excel spreadsheets pertaining to my Direct Testimony and Exhibits.
Case No. 2016-00371

Response to First Set of Data Requests of
Kentucky Industrial Utility Customers, Inc.
Dated January 11, 2017

Question No. 39

Responding Witness: Daniel K. Arbough

Q.1-39. Please provide all credit rating and bond rating agency reports (i.e., Standard and Poor’s, Moody’s, Fitch) for LG&E and KU for the last two years. Please include the most recent reports for 2017, if any.

A.1-39. See response to AG 1-265 for LG&E rating agency reports. KU’s reports can be found in the response to AG 1-266 in Case No. 2016-00370.
Q.1-40. Please provide copies of all articles, regulatory commission orders, and reports cited by Mr. McKenzie in his Direct Testimony.

A.1-40. See the response to AG 1-282 for the requested documents, with the exception of regulatory and court orders, which are publicly available from the respective agencies.
LOUISVILLE GAS AND ELECTRIC COMPANY

CASE NO. 2016-00371

Response to First Set of Data Requests of
Kentucky Industrial Utility Customers, Inc.
Dated January 11, 2017

Question No. 41

Responding Witness: Daniel K. Arbough

Q.1-41. Please provide all credit rating and bond rating agency reports (i.e., Standard and Poor’s, Moody’s, Fitch) for PPL Corporation for the last two years. Please include the most recent reports for 2017, if any.

A.1-41. See the response to AG 1-266.
Q.1-42. Please provide all work papers and supporting documentation used by Mr. Arbough in the preparation of his Direct Testimony and Exhibits. Please provide all spreadsheets with cell formulas intact. Please include all exhibits in native spreadsheets with cell formulas intact.

A.1-42. See attachments to this question being provided in excel format. Attachment 1 provides the calculations of the Moody’s capitalization adjustments. Attachment 2 details the S&P capitalization adjustment calculations. Attachment 3 includes the excel format of the attachment provided in response to PSC 1-3(a). Schedule J in excel format was provided in response to PSC 1-54(j).
Attachment 1 is being provided in a separate file in Excel format.
Attachment 2 is being provided in a separate file in Excel format.
Attachment 3 is being provided in a separate file in Excel format.
Q.1-43. Please provide all supporting calculations and documentation that support the numbers for LGE cited by Mr. Arbough on page 9, lines 3 through 16 of his Direct Testimony. Provide all spreadsheets with cell formulas intact.

A.1-43. See the response to Question No. 42.
Q.1-44. Please provide all supporting calculations and documentation that support the numbers for LGE cited by Mr. Arbough on page 10, lines 16 through 18 of his Direct Testimony. Provide all spreadsheets with cell formulas intact.

A.1-44. See the response to Question No. 42.
LOUISVILLE GAS AND ELECTRIC COMPANY

CASE NO. 2016-00371

Response to First Set of Data Requests of
Kentucky Industrial Utility Customers, Inc.
Dated January 11, 2017

Question No. 45

Responding Witness: Daniel K. Arbough

Q.1-45. Please provide Schedules J-1, J-1.1, J-1.2, J-2, J-3, and B-1.1 in native spreadsheet format with cell formulas intact.

A.1-45. See the response to PSC 1-54.
LOUISVILLE GAS AND ELECTRIC COMPANY

CASE NO. 2016-00371

Response to First Set of Data Requests of
Kentucky Industrial Utility Customers, Inc.
Dated January 11, 2017

Question No. 46

Responding Witness: David S. Sinclair

Q.1-46. Please provide the remaining service lives for each of the Company’s operating coal-fired units relied on in Case No. 2016-00027 to justify or that otherwise were assumed for the proposed environmental projects. Provide all documentation relied on for your response.

A.1-46. See the response to Question No. 10. In Case No. 2016-00027, the Companies assumed the following:

The Trimble County coal units were assumed to operate until at least 2045. This assumption is documented in Section 2 “Analysis Methodology” on p. 3 of Exhibit CRS-1, “Analysis of 2016 ECR Projects Trimble County Generating Station,” in Case No. 2016-00027.

The Mill Creek coal units were assumed to operate until at least 2021. This assumption is documented in Section 2 “Analysis Methodology” on p. 3 of Exhibit CRS-2, “Analysis of 2016 ECR Projects Mill Creek Generating Station,” in Case No. 2016-00027.

For the testimony and exhibits in Case No. 2016-00027, see http://psc.ky.gov/pscecf/2016-00027/derek.rahn%40lge-ku.com/01292016114645/6_-_LGE_Testimony_and_Exhibits.pdf.
Q.1-47. Please provide a history of transmission capital expenditures and closings to plant in service for each calendar year 2006 through 2015, the base year, and the test year separated into routine projects and specific projects (by project).

A.1-47. See attached.

Closings to plant in service for each calendar year 2006 through 2015 are not readily available in a manner that can be reproduced.
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**Louisville Gas and Electric**

*Total Company Capital Expenditures $'000s*

**Attachment #1 to Response to KIUC-1 Question No. 47**

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Attachment #1 to Response to KIUC-1 Question No. 47
Page 13 of 13
Bellar
# Closings to Plant-in service - Base Period ended 2/28/2017

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($'000s)

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Louisville Gas and Electric  
*Closings to Plant-in service - Test Period ended 6/30/2018*  
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<td></td>
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<tr>
<td></td>
<td>MC 4532 and 4504-60 TIE Brkr</td>
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Louisville Gas and Electric  
*Closings to Plant-in service - Test Period ended 6/30/2018*  
$'000s

<table>
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<th>Project</th>
<th>Project Description</th>
<th>Amount</th>
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<tr>
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<td>6,240</td>
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<td>Grand Total</td>
<td></td>
<td>18,346</td>
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</table>
Q.1-48. Referring to the proposed Curtailable Service Rider:

   a. Please provide in native format all workpapers, studies, analyses, and
documents (all Excel worksheets with working formulas and intact links)
supporting and/or underlying the development of the proposed rider.

   b. Provide all studies and/or analyses that LG&E conducted concerning
expected customer acceptance of and willingness to receive service under
the proposed rider.

   c. Identify and provide all documents provided to and correspondence with
existing interruptible customers related to the development,
implementation, and operation of the proposed CSR rider.

   d. Provide all documents relating to any customer comments and/or feedback
that LG&E received regarding the proposed reductions in rate credits under
the CSR rider prior to LG&E’s deciding to include the reduced credits in
the proposed CSR rider.

   e. Identify and provide all alternative rate credits for the CSR rider that
LG&E considered but rejected, and describe in detail the reasons for
rejecting the considered alternative(s).

A.1-48.

   a. See attached. Responsive documents subject to attorney-client privilege
or attorney work product protection are not being produced, and are noted
in the Company’s privilege log being filed in this proceeding. Also see
the response to PSC 1-54.

   b. The Company performed no surveys, analysis or studies concerning
expected customer acceptance of or willingness to receive service under
the proposed rider.
c. Beginning November 1, 2016 and thereafter, following the press release issued by the Company of a rate adjustment filing, Major Accounts Representatives communicated by email and/or telephone to inform their assigned customers of the filing. This proactive outreach is part of the role these employees serve with the company’s key and largest customers. Then on November 16, 2016 and thereafter, the Major Accounts Representatives communicated with customers that the proposed rates had been filed. Numerous communications between Major Accounts Representatives and their assigned customers have occurred since then and continue to occur. If requested by the customer, in-person meetings are being scheduled to discuss the proposed changes and spreadsheets forecasting the calculations of the proposed rates are being provided. Attached is a template email document used to communicate with customers including those served under the Curtailable Service Rider.

Across the Companies, two customers being served under Curtailable Service Rider requested and were provided a rate comparison used during an in-person meeting to discuss the proposed rates. Those rate comparisons are being provided with all customer-identifying information replaced with generic identifiers.

d. There are no such documents.

e. See the Company’s objection filed on January 20, 2017.
Mike,

The attached workbook summarizes the comparison between Henry Hub, TGT Mainline, and Dominion South daily average prices. There is relatively little difference between Henry Hub and TGT Mainline, with TGT Mainline averaging $0.07/mmBtu lower than Henry Hub. Dominion South is considerably weaker, averaging $1.06/mmBtu lower than the Henry Hub. I’ve asked PIRA for an explanation.

For the last 12 months, the average prices are as follows:

- **Henry Hub**: $2.25/mmBtu
- **TGT Mainline**: $2.18/mmBtu
- **Dominion South**: $1.29/mmBtu

Bruce
Attachment 2 is being provided in a separate file in Excel format.
Rate Case to be Submitted Initial Communication

Good morning.

As you may have seen or heard earlier this morning, Kentucky Utilities Company and Louisville Gas and Electric Company announced today that they are investing $2.2 billion in their electric and natural gas system to improve safety, reduce outage times and enhance service to customers. To recover some of the costs associated with these investments, Kentucky Utilities and Louisville Gas and Electric plan to request approval from the Kentucky Public Service Commission to adjust customer rates accordingly.

A press release was made this morning at 7am, and I have attached it for your reference. You will see there is some mention of the cost increases for the residential rate class. At this time, I do not have the respective information on the increases for Commercial or Industrial customer classes.

Next steps
As the filings are made public they will be posted to our website (https://lge-ku.com/our-company/regulatory), and I plan to forward you a copy at that time. I would be happy to meet with you and your management team in November and December to discuss the specific impacts to your business operations. The filing will request that the rate adjustments be effective in July 2017.

Please discuss this information within your organization and let me know if you have any questions or concerns.

Thanks,
Kentucky Utilities Company and Louisville Gas and Electric Company published paperwork with the Kentucky Public Service Commission for base rate adjustments. They are KPSC case numbers 2016-00370 and 2016-00371, respectively.

Additionally, the following legal notices will begin appearing in customer’s bills and various newspapers around the state:

- KU Current and Proposed Electric Rates
- LG&E Current and Proposed Electric & Gas Rates

In these links you will find the proposed rate changes. Because every commercial and industrial customer has a different load factor, the impact to your facility will vary. The filing will request that the rate adjustments be effective in July 2017.

I would be happy to meet with you and look at a “side by side” comparison of current and proposed rates based upon the historical usage of your facility. Furthermore, if you have any questions or concerns about the proposed increases, please give me a call.

In the meantime, I hope you have a happy thanksgiving with your friends and family.

Kind regards,
<table>
<thead>
<tr>
<th>Test Month</th>
<th>Bill Date</th>
<th>Energy kWH</th>
<th>Measured On Peak kVA Demand</th>
<th>Measured Interim kVA Demand</th>
<th>Measured Base kVA Demand</th>
<th>Customer Charge</th>
<th>Energy Charge</th>
<th>Demand Charge</th>
<th>CSR Credit</th>
<th>Total</th>
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**Existing Rates**

**Proposed Rates**

<table>
<thead>
<tr>
<th>Customer Charge</th>
<th>Energy Charge</th>
<th>Demand Charge</th>
<th>CSR Credit</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>$1,000</td>
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**Change:** $2,960,781 18.9%
### LG&E RTS Comparison of Current and Proposed Rates

**Existing Tariff**

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<td>Energy Charge</td>
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<td>Peak Demand Charge</td>
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<td>Base Demand Charge</td>
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<tr>
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<td>$- /kVA</td>
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<table>
<thead>
<tr>
<th>Proposed Tariff</th>
</tr>
</thead>
<tbody>
<tr>
<td>Basic Service Charge</td>
</tr>
<tr>
<td>Energy Charge</td>
</tr>
<tr>
<td>Peak Demand Charge</td>
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<tr>
<td>Interm. Demand Charge</td>
</tr>
<tr>
<td>Base Demand Charge</td>
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<td>CSR Credit</td>
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</table>

#### 24 Month Historical Information

<table>
<thead>
<tr>
<th>Test Month</th>
<th>Bill Date</th>
<th>Energy kWh</th>
<th>Measured On Peak kVA Demand</th>
<th>Measured Interim. kVA Demand</th>
<th>Measured Base kVA Demand</th>
<th>Existing Rates</th>
<th>Proposed Rates</th>
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<tbody>
<tr>
<td></td>
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<td></td>
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<td></td>
<td></td>
<td>Customer Charge</td>
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</tr>
<tr>
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<td>31,170.80</td>
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<td>31,170.80</td>
<td>31,170.80</td>
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<td>31,170.80</td>
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<td>31,170.80</td>
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<td>31,170.80</td>
<td>31,170.80</td>
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**Change:** 8.4%
### KU TODP Comparison of Current and Proposed Rates

#### Existing Tariff

<table>
<thead>
<tr>
<th>Customer Charge</th>
<th>Energy Charge</th>
<th>Demand Charge</th>
<th>CSR Credit</th>
<th>Total</th>
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</thead>
<tbody>
<tr>
<td>$300</td>
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#### Proposed Tariff

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<tr>
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<td>$150,263</td>
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Change: $409,066 12.2%
### KU TODP Comparison of Current and Proposed Rates

#### Proposed Rates

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<th>Customer Charge</th>
<th>Energy Charge</th>
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<th>Total</th>
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<tr>
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#### Existing Rates

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<th>Customer Charge</th>
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### 24 Month Historical Information

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<thead>
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<th>Test Month Bill Date</th>
<th>Energy kWh</th>
<th>Peak kVA Demand</th>
<th>Interim kVA Demand</th>
<th>Base kVA Demand</th>
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<tr>
<td>06/23/2015</td>
<td>5,784,000</td>
<td>9,747.90</td>
<td>9,805.40</td>
<td>9,805.40</td>
</tr>
<tr>
<td>05/24/2015</td>
<td>4,848,000</td>
<td>9,395.60</td>
<td>9,455.70</td>
<td>9,575.80</td>
</tr>
<tr>
<td>04/23/2015</td>
<td>5,668,800</td>
<td>9,934.20</td>
<td>9,934.20</td>
<td>10,049.50</td>
</tr>
<tr>
<td>03/24/2015</td>
<td>4,519,200</td>
<td>9,786.10</td>
<td>9,805.40</td>
<td>9,805.40</td>
</tr>
<tr>
<td>02/23/2015</td>
<td>5,082,800</td>
<td>9,848.70</td>
<td>9,873.80</td>
<td>9,873.80</td>
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<tr>
<td>01/23/2015</td>
<td>5,424,800</td>
<td>9,551.20</td>
<td>10,059.90</td>
<td>10,059.90</td>
</tr>
</tbody>
</table>

#### Energy Charge

- CA: $0.0342/kWh
- KU: $0.03432/kWh

#### Demand Charge

- CA: $3.34/kVA
- KU: $2.92/kVA

#### Charge

- Energy Charge: $0.03432/kWh
- Demand Charge: $3.34/kVA

#### Bill Date Energy kWH

- 01/23/2015: 5,212,800
- 03/24/2015: 5,179,200
- 04/23/2015: 5,668,800
- 05/21/2015: 4,848,000
- 06/23/2015: 5,784,000
- 07/22/2015: 4,833,600
- 08/21/2015: 5,347,200
- 10/22/2015: 5,318,400
- 10/21/2016: 5,721,600
- 11/20/2015: 5,203,200
- 12/22/2015: 5,361,600

#### Customer Name:

- Energy Charge: 0.03432/kWh
- Demand Charge: 3.34/kVA
- CSR Credit: 300
- Total: 3,841,206

#### Customer 2

- Energy Charge: 0.03433/kWh
- Demand Charge: 3.34/kVA
- CSR Credit: 300
- Total: 3,703,892
Q.1-49. Identify and provide all workpapers, studies, analyses, and documents related to any analyses conducted by or on behalf of LG&E concerning the potential customer-specific and service-area economic impacts of reducing the existing CSR credits.

A.1-49. There are no workpapers, studies, analyses, and documents related to any analyses conducted by or on behalf of LG&E concerning the potential customer-specific and service-area economic impacts of reducing the existing CSR credits.
Q.1-50. For each existing CSR customer (identified only by reference number), please provide the estimated annual dollar impact of LG&E’s proposed reductions in the CSR credit. Provide all workpapers supporting the estimated annual dollar impacts.

A.1-50. No such estimate was made. The Company does not forecast the annual dollar impact of the proposed reductions in the CSR credit by customer; therefore, the requested information is not available. Refer to Tab 66 of the Filing Requirements for present and proposed rates.
LOUISVILLE GAS AND ELECTRIC COMPANY

CASE NO. 2016-00371

Response to First Set of Data Requests of
Kentucky Industrial Utility Customers, Inc.
Dated January 11, 2017

Question No. 51

Responding Witness: David S. Sinclair

Q.1-51. Referring to existing Rider CSR:

a. For each customer (identified only by reference number) served under the rider, identify the total MW of curtailable/interruptible load under contract. Please indicate if the requested information is the same as information provided in the direct testimony of witness David S. Sinclair at 24: Table 6. This instruction applies to each subpart of this request.

b. State the number of months in which each customer in subpart (a) above has been continuously served under the existing rider or its predecessor.

c. For each customer identified in the subpart (a) above, provide the customer’s firm contract demand if applicable under Option A.

d. For each customer identified in the subpart (a) above, provide the customer’s Designated Curtailable Load if applicable under Option B.

A.1-51.

a. See attached. Customer 3 is the new customer from the note in the testimony of David S. Sinclair at 24, Table 6.

b. See the response to part a.

c. See the response to part a.

d. See the response to part a.
<table>
<thead>
<tr>
<th>Utility</th>
<th>Company</th>
<th>CSR Date</th>
<th>Units</th>
<th>Contract Capacity</th>
<th>Reducible To (Firm Contract Demand Option A)</th>
<th>Contract Capacity Minus Firm Load</th>
<th>Continuous Months Served</th>
</tr>
</thead>
<tbody>
<tr>
<td>LE</td>
<td>1</td>
<td>14-Jul</td>
<td>kVA</td>
<td>46,000</td>
<td>4,500</td>
<td>41,500</td>
<td>30</td>
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<tr>
<td>LE</td>
<td>2</td>
<td>10-Jul</td>
<td>kVA</td>
<td>30,000</td>
<td>6,000</td>
<td>24,000</td>
<td>78</td>
</tr>
<tr>
<td>LE</td>
<td>3</td>
<td>16-Aug</td>
<td>kVA</td>
<td>14,000</td>
<td>9,000</td>
<td>5,000</td>
<td>5</td>
</tr>
</tbody>
</table>
Q.1-52. Referring to existing Rider CSR and its predecessors:

a. For each customer (identified only by reference number) served under the rider, identify the date, time, and duration of each curtailment called by LG&E in the past 60 months?

b. For each curtailment referenced in the response to subpart (a) above, specify whether the curtailment was a system reliability event or a buy-through event, identify the MW of load curtailment requested, and identify the MW of load that failed to comply with the curtailment request.

c. For each buy-through curtailment identified in the response to subpart (b) above, specify whether the customer bought through the curtailment, the amount of buy-through energy purchased, the price paid for such buy-through energy, and the source (system supply or market) of the buy-through price.

A.1-52. a. CSR Curtailments 01/01/2012 through 01/13/2017:

<table>
<thead>
<tr>
<th>Customer</th>
<th>Start Date/Time</th>
<th>End Date/Time</th>
<th>Hours</th>
<th>Type</th>
<th>Contract/CSR Firm or CSR Reduction</th>
<th>Load Not Compliant (kVA)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>01/06/2014 18:31</td>
<td>01/06/2014 19:42</td>
<td>1.18</td>
<td>Physical Curtailment</td>
<td>36,000 kVA demand; 3,500 kW firm</td>
<td>978</td>
</tr>
<tr>
<td>1</td>
<td>01/07/2014 07:14</td>
<td>01/07/2014 10:00</td>
<td>2.77</td>
<td>Physical Curtailment</td>
<td>36,000 kVA demand; 3,500 kW firm</td>
<td>64</td>
</tr>
</tbody>
</table>

b. See the response to part a.

c. No curtailments were buy-through curtailments.
LOUISVILLE GAS AND ELECTRIC COMPANY

CASE NO. 2016-00371

Response to First Set of Data Requests of
Kentucky Industrial Utility Customers, Inc.
Dated January 11, 2017

Question No. 53

Responding Witness: David S. Sinclair

Q.1-53. Please provide a timeline for the last 10 years showing by year each curtailable/interruptible rate or rider offered by LG&E, the number of customers served under each rate/rider, and the total MW of interruptible or curtailable load served under each curtailable/interruptible rate/rider.

A.1-53. See attached.
<table>
<thead>
<tr>
<th></th>
<th></th>
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<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>CSR1</td>
<td>x</td>
<td>x</td>
<td>x</td>
<td></td>
<td></td>
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<tr>
<td>CSR2</td>
<td>x</td>
<td>x</td>
<td>x</td>
<td></td>
<td></td>
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<td></td>
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<tr>
<td>CSR3</td>
<td>x</td>
<td>x</td>
<td>x</td>
<td></td>
<td></td>
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</tr>
<tr>
<td>CSR10</td>
<td>x</td>
<td>x</td>
<td>x</td>
<td>x</td>
<td>x</td>
<td>x</td>
<td>x</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>CSR30</td>
<td>x</td>
<td>x</td>
<td>x</td>
<td>x</td>
<td>x</td>
<td>x</td>
<td>x</td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>CSR</td>
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<td></td>
<td></td>
<td></td>
<td></td>
<td>x</td>
<td>x</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Customers on each rider</th>
<th>2010</th>
<th>2011</th>
<th>2012</th>
<th>2013</th>
<th>2014</th>
<th>2015</th>
<th>2016</th>
</tr>
</thead>
<tbody>
<tr>
<td>CSR10</td>
<td>1</td>
<td>1</td>
<td>2</td>
<td>1</td>
<td>1</td>
<td></td>
<td></td>
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<td>CSR30</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>1</td>
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<td>CSR</td>
<td></td>
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<td>2</td>
<td>3</td>
</tr>
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</table>

<table>
<thead>
<tr>
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<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>CSR10</td>
<td>25.0</td>
<td>25.0</td>
<td>25.0</td>
<td>22.7</td>
<td>26.0</td>
<td></td>
<td></td>
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<tr>
<td>CSR30</td>
<td>32.5</td>
<td>32.5</td>
<td>41.5</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>CSR</td>
<td>65.5</td>
<td>70.5</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Q.1-54. Please identify all reports, studies, and/or analyses conducted by on behalf of LG&E or its parent company in the past 5 years related in total or in part to retail interruptible or curtailable electric service in Kentucky.

A.1-54. Each year, the Companies estimate the hourly integrated load reduction associated with curtailable customers that are treated as a capacity resource. The table below shows forecasted curtailable capacity for both LG&E and KU in MW by year, up to the current year, from the previous ten business plans.

<table>
<thead>
<tr>
<th></th>
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<th></th>
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</thead>
<tbody>
<tr>
<td>2008</td>
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<td></td>
<td></td>
<td></td>
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<tr>
<td>2009</td>
<td>121</td>
<td>93</td>
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<td>2010</td>
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<td>2011</td>
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<td></td>
<td></td>
<td></td>
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</tr>
<tr>
<td>2012</td>
<td>121</td>
<td>93</td>
<td>93</td>
<td>93</td>
<td>93</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
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<td>2013</td>
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<td>93</td>
<td>93</td>
<td>93</td>
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<td>119</td>
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<td>2014</td>
<td>121</td>
<td>93</td>
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<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2015</td>
<td>121</td>
<td>93</td>
<td>93</td>
<td>93</td>
<td>102</td>
<td>125</td>
<td>125</td>
<td>133</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2016</td>
<td>121</td>
<td>93</td>
<td>93</td>
<td>93</td>
<td>102</td>
<td>125</td>
<td>125</td>
<td>133</td>
<td>136</td>
<td></td>
</tr>
<tr>
<td>2017</td>
<td>121</td>
<td>93</td>
<td>93</td>
<td>93</td>
<td>102</td>
<td>125</td>
<td>125</td>
<td>133</td>
<td>136</td>
<td>130</td>
</tr>
</tbody>
</table>

Also, see the Companies’ Industrial DSM Potential Assessment filed with the Commission in Case No. 2014-00003, particularly the section concerning load control beginning at page 59. The assessment is available at: http://psc.ky.gov/pscecf/2014-00003/rick.lovekamp@lge-ku.com/05262016071923/Closed/LGE_KU_Ind_DSM_Potential_Study_2014-00003_05-26-16.pdf
Question No. 55

Responding Witness: David S. Sinclair

Q.1-55. Please explain in detail how LG&E (acting alone or in conjunction with affiliates) treats interruptible/curtailable load in:

a. Developing its long-run load forecast.

b. Determining its long-run need for future supply-side resources.

c. Determining its need for operating reserve capacity.

d. Providing ancillary services.

e. Determining whether such load qualifies as spinning reserve.

A.1-55.

a. The Company considers interruptible/curtailable load as a capacity resource.

b. See response to (a). The Company considers CSR as a capacity resource available to meet planning reserve margin requirements in resource planning decisions. CSR capacity is assumed to remain at the current level through the analysis period.

c. CSR capacity does not affect operating reserves, which consist of spinning reserves and non-spinning (supplemental) reserves. Both spinning and supplemental reserves must be available to serve load within a 15 minute period. For curtailable load to qualify as operating reserves, the curtailable load must be fully removable from system load within a 15 minute period. The execution of a CSR event requires a 60 minute notice. Therefore, CSR does not qualify as an operating reserve and is not considered when determining the need for operating reserve capacity.

d. As noted in part c., CSR capacity cannot be used for spinning and supplemental operating reserves. Similar limitations also exist for
considering CSR capacity for contingency and regulating reserves. Contingency reserves must be available within 15 minutes and regulating reserves must be immediately reactive to Automatic Generation Control to provide normal regulating margin.

e. See the response to part c.
Q.1-56. Given existing laws and regulations in Kentucky, please identify and describe in detail each non-LG&E market option and/or mechanism under which an existing CSR customer could have its curtailable load served. 
A.1-56. LG&E is not aware of any such market option or mechanism.
Question No. 57

Responding Witness: Robert M. Conroy

Q.1-57. Given existing laws and regulations in Kentucky, please identify and describe in detail each non-LG&E market option and/or mechanism through which an existing CSR customer could sell its interruptible load as a demand response resource.

A.1-57. LG&E is not aware of any such market option or mechanism.
Q.1-58. Please explain in detail how LG&E treats curtailment buy-through revenues in setting base rates and/or modifying its Fuel Adjustment Clause.

A.1-58. The last time LG&E had curtailment buy-through revenues was in September 2011 and there are no curtailment buy-through revenues included in this case. If a curtailment buy-through would occur, the buy-through revenues (fuel cost) would be deducted from the power purchase fuel cost for the month in the Fuel Adjustment Clause calculation.

Total FAC recoverable fuel cost = generation fuel + (power purchase fuel – curtailment buy-through revenues/fuel) – off system sales fuel.
Q.1-59. Please identify and explain in detail how LG&E treats test-year curtailment buy-through revenues in the electric cost-of-service study filed in this case. This request refers to the methodology that LG&E would use even if it received no test-year CSR buy-through revenue.

A.1-59. There are no buy-through revenues included in the test-year.
Q.1-60. Please identify and explain in detail how LG&E treats test-year curtailment credits paid to CSR customers in the electric cost-of-service study filed in this case. This request refers to the methodology used by LG&E, and not to any specific amount of test-year CSR credits.

A.1-60. CSR credits are treated as miscellaneous credits. In the cost of service study, as with other miscellaneous revenues and credits, CSR credits are allocated to all customer classes.
LOUISVILLE GAS AND ELECTRIC COMPANY

CASE NO. 2016-00371

Response to First Set of Data Requests of
Kentucky Industrial Utility Customers, Inc.
Dated January 11, 2017

Question No. 61

Responding Witness: David S. Sinclair

Q.1-61. Please identify and explain in detail all situations other than a system reliability event in which LG&E would need or want to physically curtail load under the CSR rider.

A.1-61. With no restriction requiring all generating units to be committed prior to curtailing load under the CSR rider, the CSR reduction would be used as an economic resource to save fuel costs up to the amount of hours specified in the tariff.
Q.1-62. Referring to the direct testimony of David S. Sinclair at 24:11 – 25:3:

   a. Confirm that the key condition discussed at 24:16-18 refers only to physical curtailments under Rider CSR.

   b. Since Rider CSR (or its predecessors) was first approved by the Commission, please identify each instance in which LG&E would have issued a physical curtailment request but was prevented from doing so by the key condition restriction discussed at 24:16-18.

A.1-62. a. The key condition referenced in Mr. Sinclair’s testimony that requires all system generating units be dispatched or in the process of being dispatched before curtailments applies to physical curtailment events.

   b. Prior to August 1, 2010, the Rider CSR did not require that all generating units be dispatched before issuing a curtailment request. While the Company is not able to identify the specific hours for additional physical curtailment, it is likely that CSR would be implemented consistent with the response in Question 61 in the absence of the key condition restriction.
Q.1-63. Referring to the direct testimony of David S. Sinclair at 25:4-9:

a. Please provide the Annual Generation Forecast.

b. For each of the eight forecast CSR curtailment events, identify and explain in detail the underlying load and system conditions driving LG&E’s expected need for physical curtailment.

A.1-63.

a. See “Section 7 – Generation Forecast” on pages 20-22 of Mr. Sinclair’s testimony and the “2017 Business Plan Generation & OSS Forecast” attached at Tab 16, Section 16(7)(c), Item H of the Companies’ Applications.

b. Of the eight forecasted curtailment events, two pertained only to a curtable customer served in the Old Dominion Power service territory in Virginia, which is governed by different rules with regard to curtailment. The Companies’ underlying load and system conditions for the peak hour of each of the remaining six events are summarized in the table below. Also see the response to PSC 2-54.

<table>
<thead>
<tr>
<th>Curtailment Event Date</th>
<th>Event Time</th>
<th>Total Generation Capacity (MW)</th>
<th>Peak Hourly Load During Event (MW)</th>
<th>Generation Unavailable – Planned Outage (MW)</th>
<th>Generation Unavailable – Other (MW)</th>
<th>Spinning Reserves (MW)</th>
<th>Purchases (MW)</th>
</tr>
</thead>
<tbody>
<tr>
<td>7/18/2017</td>
<td>Hours 13-15</td>
<td>8,136</td>
<td>6,406</td>
<td>6</td>
<td>1,317</td>
<td>406</td>
<td>0</td>
</tr>
<tr>
<td>7/19/2017</td>
<td>Hours 13-16</td>
<td>8,136</td>
<td>6,411</td>
<td>6</td>
<td>1,039</td>
<td>679</td>
<td>0</td>
</tr>
<tr>
<td>8/9/2017</td>
<td>Hours 14-16</td>
<td>8,136</td>
<td>6,807</td>
<td>6</td>
<td>1,628</td>
<td>232</td>
<td>538</td>
</tr>
<tr>
<td>3/12/2018</td>
<td>Hour 8</td>
<td>8,261</td>
<td>4,025</td>
<td>1,498</td>
<td>2,286</td>
<td>452</td>
<td>0</td>
</tr>
<tr>
<td>3/14/2018</td>
<td>Hour 7-8</td>
<td>8,261</td>
<td>4,095</td>
<td>1,498</td>
<td>2,330</td>
<td>338</td>
<td>0</td>
</tr>
<tr>
<td>3/15/2018</td>
<td>Hour 10</td>
<td>8,261</td>
<td>4,030</td>
<td>1,498</td>
<td>2,436</td>
<td>297</td>
<td>0</td>
</tr>
</tbody>
</table>
Q.1-64. Please identify each existing DSM and/or energy efficiency program that LG&E proposes to either close to new customers or limit incremental program participation by existing participants during the Forecasted Test Period.

A.1-64. In the Forecasted Test Period, the Companies are not planning to end any of the current DSM programs or limit incremental program participation. The Companies’ current DSM programs are approved through December 2018. The Companies will complete their re-evaluation of the programs by the end of 2017.
LOUISVILLE GAS AND ELECTRIC COMPANY

CASE NO. 2016-00371

Response to First Set of Data Requests of Kentucky Industrial Utility Customers, Inc.
Dated January 11, 2017

Question No. 65

Responding Witness: David S. Sinclair

Q.1-65. Referring to the direct testimony of David S. Sinclair at 26:5 – 27:3:

a. Please define primary as used in the phrase primary combustion turbines.

b. Please define (and if possible, quantify) meaningful as used in the phrase meaningful annual load growth.

c. For each of the past 10 years, please provide LG&E’s annual load growth.

d. Please provide LG&E’s forecast of annual load growth for each of the next 10 years.

A.1-65.

a. See the response to PSC 2-55(a).

b. Meaningful load growth in this context is load growth that would require resource additions in the next three to five years, and would therefore require actions in the near term to begin developing these resources.

c. See attached.

d. See attached.
### 65c

<table>
<thead>
<tr>
<th>Year</th>
<th>Actual Volumes (GWh)</th>
<th>Actual Sales Growth*</th>
<th>WN Volumes (GWh)</th>
<th>WN Sales Growth</th>
<th>Peak Hour (MW)</th>
<th>Peak Growth</th>
</tr>
</thead>
<tbody>
<tr>
<td>2007</td>
<td>12,658</td>
<td>5.79%</td>
<td>12,269</td>
<td>1.09%</td>
<td>2,834</td>
<td>3.86%</td>
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*relative to prior year

### 65d

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<th>Forecasted Sales Growth**</th>
<th>Forecasted Volumes (GWh)</th>
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<td>2,757</td>
<td>0.17%</td>
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</table>

**2017 compared to both 2016 actual and 2016 WN; others relative to prior year

Attachment to Response to KIUC-1 Question No. 65(c-d)
LOUISVILLE GAS AND ELECTRIC COMPANY

CASE NO. 2016-00371

Response to First Set of Data Requests of
Kentucky Industrial Utility Customers, Inc.
Dated January 11, 2017

Question No. 66

Responding Witness: David S. Sinclair

Q.1-66. Please provide LG&E’s current estimated cost in current dollars of an installed combustion turbine. Provide all workpapers, studies, analyses, and documents supporting and/or underlying this estimate.

A.1-66. The Companies’ current estimated combustion turbine capital cost is $624/kW in 2016 dollars. See the Companies’ 2014 Integrated Resource Plan (“IRP”), Volume III, “2014 Reserve Margin Study” and “2014 Resource Assessment” reports. The Companies’ estimated cost data for a simple-cycle combustion turbine in 2013 dollars can be found in Section 4.4.1, Table 5, on page 15 of the “2014 Reserve Margin Study.” The 2014 IRP value in 2013 dollars was escalated at 2 percent per year to 2016 dollars.

See also the response to AG 1-296.
LOUISVILLE GAS AND ELECTRIC COMPANY

CASE NO. 2016-00371

Response to First Set of Data Requests of
Kentucky Industrial Utility Customers, Inc.
Dated January 11, 2017

Question No. 67

Responding Witness: David S. Sinclair

Q.1-67. Please provide a levelized fixed charge rate for a new combustion turbine using LG&E’s cost of capital and tax rates. Provide all workpapers, studies, analyses, and documents supporting and/or underlying this response.

A.1-67. The levelized fixed charge rate for a new combustion turbine is 8.12%. See attached.
Assumptions

<table>
<thead>
<tr>
<th>Assumption</th>
<th>Value</th>
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<tbody>
<tr>
<td>Book Basis $100</td>
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<tr>
<td>Tax Basis $100</td>
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</tr>
<tr>
<td>Book Life - Years</td>
<td>30</td>
</tr>
<tr>
<td>Tax Life - Years</td>
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<td>Months in First Year</td>
<td>12</td>
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<td>Base Property Tax Rate 0.150%</td>
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<tr>
<td>Property Tax Rate Escalation 0.00%</td>
<td></td>
</tr>
<tr>
<td>O&amp;M Escalation Rate 2.00%</td>
<td></td>
</tr>
<tr>
<td>O&amp;M Base $1</td>
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</tr>
<tr>
<td>Discount Rate 10.60%</td>
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<tr>
<td>Cost of Capital 6.48%</td>
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<td>Income Tax Rate 38.900%</td>
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<tr>
<td>Insurance Escalation Rate 0.00%</td>
<td></td>
</tr>
<tr>
<td>Tax Equivalent Rate 0.00%</td>
<td></td>
</tr>
</tbody>
</table>

Deferred Taxes

| Tax Depreciation        | 5.00 9.50 8.55 7.70 6.93 6.23 5.90 5.90 5.90 |
| Book Depreciation       | 1.67 3.33 3.33 3.33 3.33 3.33 3.33 3.33 3.33 |
| Deferred Tax            | 1.30 2.40 2.03 1.70 1.40 1.13 1.00 1.00 1.00 |

Rate Base

| Beginning Balance 100 | 100 97 91 86 81 76 72 67 63 |
| Less: Book Depreciation | (1.67) (3.33) (3.33) (3.33) (3.33) (3.33) (3.33) (3.33) (3.33) |
| Less: Deferred Taxes | - (1.30) (2.40) (2.03) (1.70) (1.40) (1.13) (1.00) (1.00) |
| Ending Balance 100 | 97 91 86 81 76 72 67 63 59 |

EndYear Rate Base

| Debt Return (Interest) | 1.87 1.76 1.66 1.56 1.47 1.38 1.30 1.22 1.13 |
| Preferred Stock Return | - - - - - - - - - |
| Common Equity Return | 5.14 4.84 4.55 4.29 4.04 3.80 3.57 3.34 3.11 |
| Property Tax | 0.075 0.148 0.143 0.138 0.133 0.128 0.123 0.118 0.113 |
| A&G | 0.042 0.085 0.085 0.085 0.085 0.085 0.085 0.085 0.085 |
| Revenue Requirements (non-equity) | 3.65 5.32 5.22 5.11 5.02 4.93 4.84 4.75 4.66 |
| Revenue Requirements (equity) | 8.42 7.92 7.45 7.02 6.61 6.22 5.85 5.47 5.09 |
| Discount Rate | 1.00 0.94 0.88 0.83 0.78 0.73 0.69 0.64 0.61 |
| Present Value | $127.97 12.07 12.44 11.18 10.05 9.04 8.15 7.33 6.59 5.90 |
| Fixed Charge Rate | 8.12% |

O&M

| Present Value | 0.90 0.83 0.77 0.71 0.65 0.60 0.56 0.51 0.47 |
| Levelized Cost Factor | 0.73 |
| Fixed Charge Rate | 8.12% |
| Present Value | $127.97 8.12 7.62 7.16 6.72 6.31 5.93 5.57 5.23 4.91 |

Levelized Cost Factor 0.73

Fixed Charge Rate 0.0812

Tax Depreciation Schedule

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<th>2</th>
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CAPITAL STRUCTURE

| Debt | 47.00% 4.10% |
| Common | 53.00% 10.0% |

Present Value $127.97
Assumptions

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<th>Value</th>
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</thead>
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<td>Tax Basis</td>
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<td>Book Life - Years</td>
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<td>Tax Life - Years</td>
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<td>Base Property Tax Rate</td>
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<tr>
<td>Property Tax Rate Escalation</td>
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<tr>
<td>O&amp;M Escalation Rate</td>
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<td>Discount Rate</td>
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<tr>
<td>Cost of Capital</td>
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<td>Income Tax Rate</td>
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<tr>
<td>Insurance Rate</td>
<td>0.085%</td>
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<tr>
<td>Insurance Escalation Rate</td>
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<tr>
<td>Tax Equivalent Rate</td>
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Tax Depreciation Schedule

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Deferred Taxes

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Rate Base

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EndYear Rate Base

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Present Value

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Fixed Charge Rate

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Present Value

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Present Value

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## Assumptions

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<tr>
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<tr>
<td>Base Property Tax Rate</td>
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<td>Property Tax Rate Escalation</td>
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<td>Insurance Escalation Rate</td>
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<tr>
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### Tax Depreciation Schedule

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### Deferred Taxes

| Tax Depreciation | - | - | - | - | - | - | - | - |
| Book Depreciation| 3.33| 3.33| 3.33| 3.33| 3.33| 3.33| 3.33| 3.33| 3.33| 3.33| 3.33| 3.33|
| Deferred Tax     | (1.30)| (1.30)| (1.30)| (1.30)| (1.30)| (1.30)| (1.30)| (1.30)| (1.30)| (1.30)| (1.30)| (1.30)|

### Rate Base

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<tr>
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<table>
<thead>
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<th>EndYear Rate Base</th>
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<tbody>
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<td>Debt Return (Interest)</td>
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<td>Preferred Stock Return</td>
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<td>Common Equity Return</td>
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<td>Discount Rate</td>
<td>0.32</td>
</tr>
<tr>
<td>Present Value</td>
<td>$127.97</td>
</tr>
</tbody>
</table>

### O&M

| O&M                        | 1 | 1 | 1 | 2 | 2 | 2 | 2 | 2 | 2 |
| Present Value              | 0.21 | 0.19 | 0.18 | 0.17 | 0.15 | 0.14 | 0.13 | 0.12 | 0.11 |

### Levelized Cost Factor

| Present Value              | $127.97 | $2.62 | $2.46 | $2.31 | $2.17 | $2.04 | $1.92 | $1.80 | $1.69 | $1.59 |
## Assumptions

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<td>Tax Basis</td>
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<td>Book Life - Years</td>
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</tr>
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<td>Tax Life - Years</td>
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<td>Months in First Year</td>
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<td>Property Tax Rate Escalation</td>
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<td>Cost of Capital</td>
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### Tax Depreciation Schedule

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<td>Months</td>
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<td>29</td>
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### Deferred Taxes

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<td>Tax Depreciation</td>
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<td>Book Depreciation</td>
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### Rate Base

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<td>Beginning Balance</td>
<td>100</td>
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<tr>
<td>Less: Book Depreciation</td>
<td>(3.33)</td>
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<td>- (1.30)</td>
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### EndYear Rate Base

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<tr>
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<tr>
<td>Debt Return (Interest)</td>
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<tr>
<td>Preferred Stock Return</td>
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<td>Common Equity Return</td>
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### Property Tax

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<td>A&amp;G</td>
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### Revenue Requirements (non-equity)

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<td>Revenue Requirements (non-equity)</td>
<td>3.53</td>
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<tr>
<td>Revenue Requirements (equity)</td>
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### Discount Rate

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<tr>
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<td>Discount Rate (equity)</td>
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### Present Value

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<tr>
<td>Present Value</td>
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<td>Fixed Charge Rate</td>
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### O&M

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### Levelized Cost Factor

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<tr>
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<td>$8.12</td>
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<tr>
<td>Levelized Cost Factor</td>
<td>$1.49</td>
</tr>
<tr>
<td>Levelized Cost Factor</td>
<td>$1.23</td>
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</table>

$127.97 $8.12 $8.12 $8.12 $8.12
Q.1-68. Please provide the estimated fixed O&M for a new combustion turbine in current dollars. Provide all workpapers, studies, analyses, and documents supporting and/or underlying this response.

A.1-68. The Companies’ current estimated combustion turbine fixed O&M cost is $29.7/kW-yr in 2016 dollars, which comprises $21.9/kW-yr for firm gas transport and $7.7/kW-yr for other fixed O&M. See the response to Question No. 66. The 2014 IRP values in 2013 dollars were escalated at 2 percent per year to 2016 dollars.
Response to First Set of Data Requests of
Kentucky Industrial Utility Customers, Inc.
Dated January 11, 2017

Question No. 69

Responding Witness: David S. Sinclair

Q.1-69. Please provide LG&E’s required reserve margin for capacity planning. Provide all workpapers, studies, analyses, and documents supporting and/or underlying this response.

LOUISVILLE GAS AND ELECTRIC COMPANY

CASE NO. 2016-00371

Response to First Set of Data Requests of
Kentucky Industrial Utility Customers, Inc.
Dated January 11, 2017

Question No. 70

Responding Witness: Robert M. Conroy

Q.1-70. Please provide a copy of LG&E’s most recent integrated resource plan.

A.1-70. See the response to AG 1-296.
Q.1-71. Please provide all workpapers, studies, analyses, and documents underlying and supporting LG&E’s proposed change in the natural gas price index used to determine the automatic buy-through price in Rider CSR.

A.1-71. See the response to Question No. 48(a).
Q.1-72. Referring to the direct testimony of Robert M. Conroy at 16:20-23:

a. Explain in detail the conditions under which LG&E would no longer “continue to allow the current customers under the CSR service schedule to remain CSR customers for an indefinite period of time. . . .”

b. Explain in detail why “the Company is not proposing to remove CSR from its tariff at this time.”

A.1-72.

a. LG&E has not established such a set of conditions.

b. LG&E is not proposing the remove CSR from its tariff at this time because existing CSR customers’ curtailable load is included as a resource in existing plans and could help LG&E meet its reserve margin requirements in the future.
Q.1-73. Referring to the direct testimony of Robert M. Conroy at 17:1-3, explain in detail LG&E’s rationale for maintaining the $16 per kVA non-compliance charge in the proposed Rider CSR while reducing the CSR credits by more than 40 percent.

A.1-73. The purpose of the non-compliance charge is to encourage customers to curtail service when called upon to interrupt their load. The $16 per kVA non-compliance charge was first introduced in Case No. 2003-00433 for LG&E and Case No. 2003-00434 for KU. The $16 per kVA non-compliance charge has not changed since it was first introduced in the 2003 rate cases. The $16 non-compliance charge was based on approximately four months of the CSR credit, which was approximately $4/kW at the time. (See Direct Testimony of William Steven Seelye filed in Case Nos. 2003-00433 and 2003-00434). However, as the CSR credit increased over time there was no corresponding increase in the non-compliance charge. The current level of the CSR credit for LG&E and KU is $6.40 to $6.50, depending on the service voltage. Four months of the current credit would have resulted in a non-compliance charge of around $26. At the proposed CSR credit in this proceeding, four months of the credit would result in a non-compliance charge of $13 to $14.
Q.1-74. Provide in native format all workpapers, studies, analyses, and documents supporting and/or underlying the $16 per kW Non-Compliance Charge in the proposed CSR rider.

A.1-74. See the response to KIUC 1-73.
LOUISVILLE GAS AND ELECTRIC COMPANY

CASE NO. 2016-00371

Response to First Set of Data Requests of
Kentucky Industrial Utility Customers, Inc.
Dated January 11, 2017

Question No. 75

Responding Witness: William S. Seelye

Q.1-75. Referring to the direct testimony of William Steven Seelye at Exhibit WSS-3:

a. Please provide the exhibit in Excel format with working formulas and all links intact.

b. Please provide all workpapers, studies, analyses, and documents supporting and/or underlying the exhibit.

c. Please identify and provide the specific information and data source for each row item in the column labeled Description in the exhibit.

A.1-75.

a. See the Att_LGE_PSC_1-54_LGECMR.xlsx spreadsheet provided in response to PSC 1-54.

b. See attached.

c. The costs (plant, accumulated depreciation, accumulated deferred income taxes, depreciation expenses, operation and maintenance expenses, property taxes) shown on Exhibit WSS-3 are from the Company’s financial forecast for the test-year. The rate of return is based on the weighted cost of capital proposed in this proceeding. Income taxes are based on the composite income tax rate used to determine revenue requirements in this proceeding. The loss factors are those used in the Cost of Service Studies.
<table>
<thead>
<tr>
<th>Location</th>
<th>6/30/2017</th>
<th>7/31/2017</th>
<th>8/31/2017</th>
<th>9/30/2017</th>
<th>10/31/2017</th>
<th>11/30/2017</th>
</tr>
</thead>
<tbody>
<tr>
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<td>73,263,212.14</td>
<td>73,263,212.14</td>
<td>73,263,212.14</td>
<td>73,263,212.14</td>
<td>73,263,212.14</td>
<td>77,854,211.93</td>
</tr>
<tr>
<td>Accumulated Depreciation Brown</td>
<td>(36,112,085.04)</td>
<td>(36,422,723.56)</td>
<td>(36,733,362.07)</td>
<td>(37,044,000.59)</td>
<td>(37,354,639.10)</td>
<td>(37,461,686.70)</td>
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<tr>
<td>CWIP Brown</td>
<td>2,653,837.63</td>
<td>2,653,837.63</td>
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<td>7,553,837.63</td>
<td>15,266,999.87</td>
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<td>-</td>
<td>-</td>
<td>400,000.00</td>
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<tr>
<td><strong>Total Brown</strong></td>
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<td>39,494,326.21</td>
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<td>43,773,049.18</td>
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<td>49,334,525.23</td>
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<td><strong>Depreciation Expense Brown</strong></td>
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<td>310,638.52</td>
<td>310,638.52</td>
<td>310,638.52</td>
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<td><strong>Plant Trimble</strong></td>
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<td>126,777,340.02</td>
<td>126,777,340.02</td>
<td>126,777,340.02</td>
<td>128,754,417.30</td>
<td>128,754,417.30</td>
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<tr>
<td>Accumulated Depreciation Trimble</td>
<td>(52,860,897.85)</td>
<td>(53,302,405.74)</td>
<td>(53,744,371.70)</td>
<td>(54,186,337.65)</td>
<td>(54,631,498.85)</td>
<td>(55,079,855.29)</td>
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<td>CWIP Trimble</td>
<td>6,661,519.78</td>
<td>6,732,519.78</td>
<td>6,793,519.78</td>
<td>7,115,769.78</td>
<td>1,281,735.01</td>
<td>1,281,735.01</td>
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<tr>
<td>RWIP Trimble</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td><strong>Total Trimble</strong></td>
<td>80,327,961.95</td>
<td>80,207,454.06</td>
<td>79,826,488.10</td>
<td>79,706,772.15</td>
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<tr>
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<td>(16,014,833.22)</td>
<td>(16,195,655.92)</td>
<td>(16,376,478.63)</td>
<td>(16,557,301.34)</td>
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<td><strong>Total Paddys 13</strong></td>
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<td>180,822.71</td>
<td>180,822.71</td>
<td>180,822.71</td>
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Note:

Plant balances above include land from Plant Account 134020 - Land

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<tr>
<td><strong>Brown</strong></td>
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<td>5,015.43</td>
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<td>1/31/2018</td>
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<td>(37,789,143.38)</td>
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<td>(55,529,023.43)</td>
<td>(55,979,003.29)</td>
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<td>(56,878,963.00)</td>
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<td>(57,778,922.71)</td>
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<td>13 mos average</td>
<td>44,856,883.66</td>
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<td>181,628.97</td>
<td>181,628.97</td>
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<td>2,956.70</td>
<td>2,956.70</td>
<td>2,956.70</td>
<td>2,956.70</td>
<td>2,956.70</td>
</tr>
<tr>
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<td>5,015.43</td>
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<tr>
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<td>Projected Accumulated Deferred Taxes at June 30, 2017</td>
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<td>Projected Accumulated Deferred Taxes at June 30, 2018</td>
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<tr>
<td>3</td>
<td>Decrease in Accumulated Deferred Taxes for the forward year</td>
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<tr>
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<td>July 1-31, 2017</td>
<td>$(20,102)</td>
<td>335/365</td>
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<td>6</td>
<td>August 1-31, 2017</td>
<td>(20,102)</td>
<td>304/365</td>
<td>(16,743)</td>
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<td>7</td>
<td>September 1-30, 2017</td>
<td>(20,102)</td>
<td>274/365</td>
<td>(15,090)</td>
<td></td>
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<tr>
<td>8</td>
<td>October 1-31, 2017</td>
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<td>243/365</td>
<td>(13,383)</td>
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<td>9</td>
<td>November 1-30, 2017</td>
<td>(23,373)</td>
<td>213/365</td>
<td>(13,640)</td>
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<td>10</td>
<td>December 1-31, 2017</td>
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<td>182/365</td>
<td>(13,286)</td>
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<td>(35,546)</td>
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## Large Frame CT Labor Costs

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Prop Tax Expense (in dollars $)

### Kentucky Utilities Company

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Q.1-76. Please identify the carrying cost(s) used by LG&E in its most recent integrated resource plan to evaluate the cost of alternative resource options, specify the components of such carrying cost, provide the formula used to derive the carrying cost, and explain its derivation in detail.

A.1-76. LG&E’s 2014 IRP carrying cost was 7.19%, which was composed of LG&E’s equity portion (55.1%) multiplied by LG&E’s return on equity (10.25%), plus LG&E’s debt portion (44.9%) multiplied by LG&E’s cost of debt (3.43%).
LOUISVILLE GAS AND ELECTRIC COMPANY

CASE NO. 2016-00371

Response to First Set of Data Requests of
Kentucky Industrial Utility Customers, Inc.
Dated January 11, 2017

Question No. 77

Responding Witness: David S. Sinclair / Daniel K. Arbough

Q.1-77. Please identify the carrying cost(s) used by LG&E in its current analyses of generation resource options, specify the components of such carrying cost, provide the formula used to derive the carrying cost, and explain its derivation in detail.

A.1-77. LG&E’s current carrying cost is 7.23%, which is composed of LG&E’s equity portion (53%) multiplied by LG&E’s return on equity (10%), plus LG&E’s debt portion (47%) multiplied by LG&E’s cost of debt (4.10%).
LOUISVILLE GAS AND ELECTRIC COMPANY

CASE NO. 2016-00371

Response to First Set of Data Requests of
Kentucky Industrial Utility Customers, Inc.
Dated January 11, 2017

Question No. 78

Responding Witness: Robert M. Conroy / William S. Seelye

Q.1-78. Please provide excel versions, with formulas intact, of each of the exhibits presented by LGE witnesses Robert Conroy and Steven Seelye.

A.1-78. See the responses to PSC 1-53 and PSC 1-54.
Q.1-79. Please provide all supporting workpapers that support Mr. Conroy’s testimony and exhibits and Mr. Seelye’s testimony and exhibits. If such workpapers are available in excel format, please provide with formulas intact.

A.1-79. See the responses to PSC 1-53 and PSC 1-54.
LOUISVILLE GAS AND ELECTRIC COMPANY

CASE NO. 2016-00371

Response to First Set of Data Requests of
Kentucky Industrial Utility Customers, Inc.
Dated January 11, 2017

Question No. 80

Responding Witness: William S. Seelye

Q.1-80. To the extent not provided in response to the previous question, please provide the following information for each rate class/rate schedule included as a separate class in the class cost of service study for the test year 12 months ending June 2018:

a. monthly system peak load (LGE and KU separately stated and combined).

b. the load of each rate class at the time of the monthly LGE/KU system peak, showing the following:
   1. load at meter
   2. losses
   3. load at generation

c. Monthly mWh energy at the generation voltage level for the rate class/rate schedule.

d. Energy and demand loss factors for each voltage level, by rate class/rate schedule, at which customers on the rate class/rate schedule take service.

e. Monthly mWh energy sales at the meter, separately stated for each voltage at which customers in each rate class/rate schedule take service, by rate class/rate schedule (for example, the metered mWh for Rate PS secondary and Rate PS primary by month).

A.1-80.

a. See the attachment to PSC 2-109.

b. See the response to part a.

c. See the response to part a.

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<td>Lighting Energy</td>
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e. See the response to part a.
Q.1-81. With regard to LGE – WSS-17 (LOLP), please provide all supporting workpapers, in excel format with all formulas intact, used to develop this exhibit. This would include, but not be limited to:

a. hourly system load

b. hourly rate class load at:
   1. meter
   2. generation voltage
   3. loss factor used to convert metered load into load at generation

c. hourly LOLP for the combined KU-LGE system

A.1-81. See the response to PSC 2-109.
Q.1-82. Please provide the output of the analysis used to develop hourly LOLP. Provide in excel format, with formulas intact.

A.1-82. See the response to AG 1-294(a).
LOUISVILLE GAS AND ELECTRIC COMPANY

CASE NO. 2016-00371

Response to First Set of Data Requests of
Kentucky Industrial Utility Customers, Inc.
Dated January 11, 2017

Question No. 83

Responding Witness: William S. Seelye

Q.1-83. Provide, for the past three years (2016, 2015 and 2014) the following actual information:

   a. monthly system peak load (LGE and KU separately stated and combined system.

   b. date and hour of the LGE + KU monthly peaks

   c. date and hour of the separate LGE and KU monthly peaks

A.1-83.

   a. See attached.

   b. See attached.

   c. See attached.
<table>
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<th>KU</th>
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*Hour signifies hour beginning
Question No. 84

Responding Witness: William S. Seelye

Q.1-84. Please provide a description of how AMS costs allocated in the class cost of service studies presented by Mr. Seelye (WSS-23, WSS-24)?

A.1-84. AMS costs are functionally assigned, classified, and allocated on the basis of the FERC plant and expense account in which the costs are included for the test year. Specifically, all AMS plant costs are included in metering plant Account No. 370. AMS operation and maintenance expenses are included in Account No. 586 – Meter Expenses, Account No. 597 – Maintenance of Meters, Account No. 903 – Customer Records and Collection Expenses, and Account No. 910 – Miscellaneous Customer Service Expenses. The majority of the expenses for AMS are included in Accounts 597 and 903. These accounts are classified as customer-related in the cost of service study.
Q.1-85. Please provide any information available to Mr. Seelye, the Prime Group or KU regarding the following:

a. Any regulatory jurisdiction that has adopted the LOLP cost of service method used by Mr. Seelye in this case.

b. For each such jurisdiction, please provide a copy of a Commission Order addressing this issue.

c. Identification of any electric utility that supported the LOLP method in testimony before a state regulatory commission. Please identify the name of the utility, the case number and a copy of the testimony.

d. Identification of any electric utility in KY that has presented testimony before the KPSC in support of the LOLP cost of service method. For each such utility, please provide the name of the utility, the case number and a copy of the testimony.

A.1-85.

a. See the response to PSC 2-86.

b. See the response to PSC 2-86.

c. See the response to PSC 2-86.

d. See the response to PSC 2-86.
Q.1-86. Please provide any testimony, papers or presentations prepared by Mr. Seelye or any other employee of the Prime Group in the past ten years which addresses the LOLP cost of service methodology. This would include all testimony, papers or presentations supporting the LOLP method and testimony opposing the LOLP method.

A.1-86. These are the first proceedings in which Mr. Seelye or other employees of The Prime Group have submitted a cost of service study using the LOLP methodology.
LOUISVILLE GAS AND ELECTRIC COMPANY

CASE NO. 2016-00371

Response to First Set of Data Requests of
Kentucky Industrial Utility Customers, Inc.
Dated January 11, 2017

Question No. 87

Responding Witness: Robert M. Conroy / William S. Seelye

Q.1-87. With regard to the decision by KU to present an LOLP cost of service study in this case, please provide all memoranda, emails or other writings that address this decision prepared in the past two years.

A.1-87. There were no memoranda, emails or other writings that address the decision to use the LOLP methodology. Mr. Seelye described the LOLP methodology in meetings and presented the results of the BIP methodology and LOLP methodology which were filed in this proceeding.
Response to First Set of Data Requests of
Kentucky Industrial Utility Customers, Inc.
Dated January 11, 2017

Question No. 88

Responding Witness: William S. Seelye

Q.1-88. With regard to Mr. Seelye’s testimony at 2:6, please provide a complete description of the methodologies that LGE and KU utilize to plan generation resources. Please provide the same information for transmission resources.

A.1-88. See the “Annual Generation Forecast Process” attached at Tab 16, Section 16(7)(c), Item G of the Companies’ Applications. See also the Companies’ 2014 Integrated Resource Plan (“IRP”), Volume III, “2014 Reserve Margin Study” and “2014 Resource Assessment” reports. See also the response to AG 1-296.

See also the attached Transmission System Planning Guidelines.
Approved by:

Matthew Burns, Group Leader Transmission Planning
Date: 9/20/16

Delyn Kilpaqk, Manager - Transmission Strategy & Planning
Date: 9/20/2016

Christopher Balmer, Director - Transmission Strategy & Planning
Date: 9/21/2016

Tom Jessee, VP – Transmission
Date: 9/28/16

John Voyles, VP – Transmission/Generation Services
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<td>March 11, 2005</td>
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<td>March 1, 2007</td>
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<td>May 7, 2007</td>
<td>Better quantified thermal overload and voltage violations and added Section 4 – Impacted Facilities</td>
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<td>September 11, 2007</td>
<td>Added section describing how Guidelines exceed NERC requirements</td>
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<td>May 1, 2008</td>
<td>Added effective date, signatures, Revision History, Contingency Selection criteria, updated Tables 2 &amp; 3 and updated certain references</td>
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<td>July 1, 2008</td>
<td>Updated performance requirements and incorporated SOL Methodology</td>
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<td>August 14, 2009</td>
<td>Added statement reiterating comparable treatment of service requests per FERC Order.</td>
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<td>Changed Company name from E.ON to LG&amp;E/KU; edited to match other guidelines; added detail to stability section</td>
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<td>December 20, 2013</td>
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<td>December 30, 2013</td>
<td>Correct error in footnote 13 on page 8</td>
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<tr>
<td>July 30, 2014</td>
<td>Changes required to address new TPL-001-4 standard</td>
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<tr>
<td>October 30, 2014</td>
<td>Make corrections; section 5.8, 5.10, 6.4, 7.2, 7.5.2, 8.2, Attachment A</td>
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<td>Section 1: applicability to 2015 TEP removed; section 5.4 details of load scenarios described; section 5.6 DNR changed to NITS capacity; added section 5.8 to described ratings in off-peak models; removed unnecessary paragraph 5.10.1; section 5.12 added language in case ERAG models are late; section 6.1 and 6.7 removed flowgate analysis requirement; added section 6.2.1.1 details of sensitivity study requirements; section 6.6 added language to match TPL-001-4 2.5; section 6.7 added NITS capacity sensitivity study; previous section 8.2 “Corrective Action Plan” moved to new section 10; section 8.2 added clarification for TPL-001-4 footnote 12; revised stability criteria to accommodate load inductor model section 8 and 9.2; RC requested changes to Instability Identification Section 9.1 and 9.2.</td>
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<td>Make changes for MOD-032 data requests. Change identification of Cascading/Instability; Correct error in 7.7.1 that says “single line to ground”. Clarify which 69 kV buses are monitored for voltage (Section 8.2); corrected angular stability in Section 8.3.1; made criteria for generator synchronism match TPL-001-4 (Section 8.3.5 through 8.3.7).</td>
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1 Purpose

This document describes the guidelines used for developing the LG&E and KU Energy LLC (LG&E and KU) Transmission Expansion Plan (TEP). The TEP is intended to show compliance with NERC Reliability Standard TPL-001-4. LG&E and KU is registered as both a Planning Coordinator and Transmission Planner. The LG&E and KU Transmission Planning Group performs the functions for both the Planning Coordinator and Transmission Planner. This document establishes the minimum planning criteria for the LG&E and KU transmission System. The transmission System includes equipment and Facilities operated at 69 kV and above.

2 Overview

The primary purpose of LG&E and KU's transmission System is to reliably transmit electrical energy from Designated Network Resources to Network Loads. Interconnections to other transmission Systems have been established to increase the reliability of LG&E and KU's transmission System and to provide access to emergency generation sources for Network Customers.

The Federal Energy Regulatory Commission (FERC) requires all public utilities that own, control or operate facilities used for transmitting electric energy in interstate commerce have a non-discriminatory Open Access Transmission Tariff (OATT). LG&E and KU's Operating Companies have an OATT on file with FERC to provide Point to Point Transmission Service and Network Integration Transmission Service. LG&E and KU is committed to providing the same reliability and priority of service for all Point to Point Transmission Service for its network customers. LG&E and KU is committed to ensuring that customers with comparable service requests are treated comparably for transmission planning purposes.

3 NERC Reliability Standards Compliance

NERC Reliability Standard TPL-001-4 governs the requirements for planning the interconnected Bulk Electric System (BES) such that the network can be operated to supply real and reactive forecasted loads and projected Firm (non-recallable reserved) Transmission Services. LG&E and KU's Transmission System Planning Guidelines is intended to meet or exceed the requirements of TPL-001-4.

4 Definitions

The following is a list of NERC definitions used in these Planning Guidelines and can be found in the NERC Glossary.
**Balancing Authority (BA):** The responsible entity that integrates resource plans ahead of time, maintains load-interchange-generation balance within a Balancing Authority Area, and supports Interconnection frequency in real time.

**Bulk Electric System (BES):** Definition is too lengthy to include in this document. It should be reviewed on the NERC Glossary of terms.

**Bus-tie Breaker:** A circuit breaker that is positioned to connect two individual substation bus configurations.

**Cascading:** The uncontrolled successive loss of system elements triggered by an incident at any location. Cascading results in widespread electric service interruption that cannot be restrained from sequentially spreading beyond an area predetermined by studies.

**Capacity Benefit Margin (CBM):** The amount of firm transmission transfer capability preserved by the transmission provider for Load-Serving Entities (LSEs), whose loads are located on that Transmission Service Provider’s system, to enable access by the LSEs to generation from interconnected systems to meet generation reliability requirements. Preservation of CBM for an LSE allows that entity to reduce its installed generating capacity below that which may otherwise have been necessary without interconnections to meet its generation reliability requirements. The transmission transfer capability preserved as CBM is intended to be used by the LSE only in times of emergency generation deficiencies.

**Consequential Load:** All Load that is no longer served by the Transmission system as a result of Transmission Facilities being removed from service by a Protection System operation designed to isolate the fault.

**Contingency:** The unexpected failure or outage of a system component, such as a generator, transmission line, circuit breaker, switch or other electrical element.

**Corrective Action Plan(s):** A list of actions and an associated timetable for implementation to remedy a specific problem.

**Demand Side Management (DSM):** The term for all activities or programs undertaken by Load-Serving Entity or its customers to influence the amount or timing of electricity they use.

**Element:** Any electrical device with terminals that may be connected to other electrical devices such as a generator, transformer, circuit breaker, bus section, or transmission line. An element may be comprised of one or more components.

**Facility:** A set of electrical equipment that operates as a single Bulk Electric System Element (e.g., a line, a generator, a shunt compensator, transformer, etc.)
*Facility Rating:* The maximum or minimum voltage, current, frequency, or real or reactive power flow through a facility that does not violate the applicable equipment rating of any equipment comprising the facility.

*Fault:* An event occurring on an electric system such as a short circuit, a broken wire, or an intermittent connection.

*Firm Transmission Service:* The highest quality (priority) service offered to customers under a fixed rate schedule that anticipates no planned interruption.

*Load:* An end-use device or customer that receives power from the electric system.

*Load Serving Entity (LSE):* Secures energy and transmission service (and related Interconnected Operations Services) to serve the electrical demand and energy requirements of its end-use customers.

*Long-Term Transmission Planning Horizon:* Transmission planning period that covers years six through ten or beyond when required to accommodate any known longer lead time projects that may take longer than ten years to complete.

*Near-Term Transmission Planning Horizon:* The transmission planning period that covers Year One through five.

*Network Integration Transmission Service:* Service that allows an electric transmission customer to integrate, plan, economically dispatch and regulate its network reserves in a manner comparable to that in which the Transmission Owner serves Native Load customers.

*Non-Consequential Load Loss:* Non-Interruptible Load loss that does not include: (1) Consequential Load Loss, (2) the response of voltage sensitive Load, or (3) Load that is disconnected from the System by end-user equipment.

*Off-Peak:* Those hours or other periods defined by NAESB business practices, contract, agreements, or guides as periods of lower electrical demand.

*On-Peak:* Those hours or other periods defined by NAESB business practices, contract, agreements, or guides as periods of higher electrical demand.

*Operating Reserve:* That capability above firm system demand required to provide for regulation, load forecasting error, equipment forced and scheduled outages and local area protection. It consists of spinning and non-spinning reserve.

Planning Authority: The responsible entity that coordinates and integrates transmission facility and service plans, resource plans and protection systems.

Planning Coordinator: See Planning Authority

Point to Point Transmission Service: The reservation and transmission of capacity and energy on either a firm or non-firm basis from the Point(s) of Receipt to the Point(s) of Delivery.

Protection System:
  • Protective relays which respond to electrical quantities,
  • Communications systems necessary for correct operation of protective functions
  • Voltage and current sensing devices providing inputs to protective relays,
  • Station dc supply associated with protective functions (including batteries, battery chargers, and non-battery-based dc supply), and
  • Control circuitry associated with protective functions through the trip coil(s) of the circuit breakers or other interrupting devices.

Resource Planner: The entity that develops a long-term (generally one year and beyond) plan for the resource adequacy of specific loads (customer demand and energy requirements) within a Planning Authority Area.

Special Protection System (SPS) or Remedial Action Scheme: An automatic protection system designed to detect abnormal or predetermined system conditions, and take corrective actions other than and/or in addition to the isolation of faulted components to maintain system reliability. Such action may include changes in demand, generation (MW and Mvar), or system configuration to maintain system stability, acceptable voltage, or power flows. An SPS does not include (a) underfrequency or undervoltage load shedding or (b) fault conditions that must be isolated or (c) out-of-step relaying (not designed as an integral part of an SPS). Also called Remedial Action Scheme.

Stability: The ability of an electric system to maintain a state of equilibrium during normal and abnormal conditions or disturbances.

System: A combination of generation, transmission, and distribution components.

Transmission: An interconnected group of lines and associated equipment for the movement or transfer of electric energy between points of supply and points at which it is transformed for delivery to customers or is delivered to other electric systems.

Transmission Reliability Margin (TRM): The amount of transmission transfer capability necessary to provide reasonable assurance that the interconnected transmission network will be secure. TRM accounts for the inherent uncertainty in system conditions and the need for operating flexibility to ensure reliable system operation as system conditions change.
Transmission Planner (TP): The entity that develops a long-term (generally one year beyond) plan for the reliability (adequacy) of the interconnected bulk electric transmission systems within its portion for the Planning Authority Area.

Year One: The first twelve month period that a Planning Coordinator or a Transmission Planner is responsible for assessing. For an assessment started in a given calendar year, Year One includes the forecasted peak Load period for one of the following two calendar years. For example, if a Planning Assessment was started in 2011, then Year One includes the forecast peak Load period for either 2012 or 2013.

The following are LG&E and KU Transmission Planning Defined Terms used in these Planning Guidelines:

Extreme Event Report: Report of the results for the extreme events studies for TPL-001-4 Table 1 extreme events.

HV: Facilities operated between 100 kV and 300 kV.

5 Models

This section describes the models that are built for compliance with TPL-001-4.

5.1 Normal System Condition Models

Per TPL-001-4 R1, LG&E and KU maintains normal System condition models within its respective area for performing the studies needed to satisfy the requirements of TPL-001-4 Standard. The models use data consistent with that provided in accordance with the MOD-010 and MOD-012 standards, supplemented by other sources as needed, and shall represent projected System conditions. The process for developing the steady state and stability models are described in this section. Normal System condition models shall include:

- Existing Elements¹: model of 69 kV and above lines, transformers, substations etc.
- Known outage(s) of generation or Transmission facilities described in Section 5.2.
- New planned Elements and Facilities and changes to existing Elements and Facilities as described in 5.3.
- Real and reactive forecasted load as described in 5.4.
- Known commitments for Firm Transmission Service and Interchange as described in 5.5.
- Resources (supply or demand side) required for Load

¹ TPL-001-4 1.1.1
The above models represent normal System conditions and must meet the performance requirements of TPL-001-4 Table 1 Category P0.² The applicable Facility Rating for TPL-001-4 Table 1 Category P0 is the seasonal normal rating.

5.2 Known Outages

Known outages in the Near Term of generation or transmission Elements and Facilities with a duration of at least six months will be modeled for the seasons and years in which the outage is scheduled in both the System Peak and Off-Peak models³. Models will be developed, and an assessment of the System with these outages will be completed by analyzing Categories P0 and P1 planning events in Table 1 of TPL-001-4⁴.

Outages lasting longer than six months are supplied by the GO and TO to the PC through the MOD-032 data submittal.

5.3 New planned Elements and Facilities

The steady state and stability models developed will include projects as documented in the previous year’s TEP including new planned Elements and Facilities and changes to existing and planned Elements and Facilities.⁵ For both steady state and stability models, projects from the previous year’s TEP are included according to the expected in-service dates. In addition, all projects that were completed after the completion of the previous year’s TEP will be included in the Base Case Series (BCS) models.

Since the group that performs the functions for the LG&E and KU Transmission Planner (TP) also performs the functions for the LG&E and KU PC, there is no need for a MOD-032 data submittal from TP to PC for new planned Elements and Facilities.

5.4 Real and Reactive Forecasted Load

Load Serving Entities (LSEs) provide delivery point forecast for real power and power factor per the MOD-032 data submittal. The reactive load is calculated with the real power and power factor. The LSE load forecast for network load levels are included in the models.⁶

Load forecasts are typically provided for the following conditions:

² TPL-001-4 R1
³ TPL-001-4 1.1.2
⁴ TPL-001-4 2.1.3
⁵ TPL-001-4 1.1.3
⁶ TPL-001-4 1.1.4
• Summer and Winter Peak – 50/50 peak forecast
• Off-Peak\(^7\) –
  o Light Load – Lowest loads typically observed in the middle of the night or early morning on a spring day (i.e. Easter morning)
  o Summer Shoulder – 70% to 80% of summer peak load

Additional forecasts may be requested on an as needed basis.

5.5 Transmission Service Reservation (TSR)

For both steady state and stability models, firm transmission service reservations that are annual, confirmed, and have a contract period of five or more years may be included\(^8\) in the models. A list of the TSRs included in the base case models are documented in the TEP report. TSRs that are not included in the models will be evaluated in the sensitivity study discussed in section 6.7.

TSR information is supplied to the LG&E and KU PC from the appropriate RP through the MOD-032 data submittal.

5.6 Real Power Resource Modeling

This section applies to real power resource modeling of units connected to the LG&E and KU transmission system.

The real power resource modeling, for generating units connected to the LG&E and KU transmission system, for steady state and stability models is provided by Generator Owners and/or Resource Planners, and includes capabilities for both On-Peak and Off-peak scenarios\(^9\). Off-peak scenarios are described in Section 5.4. The generation that is on-line initially comes from a merit order that is also provided to the Transmission Planner by the Resource Planner. Operating Reserves are modeled if sufficient generation is available. The process of modeling Operating Reserves dispatches large units (25 MW or greater) to some value less than their maximum output, so that the sum total of available output for online units meets or exceeds the reserve requirements.

There could be instances where there may not be enough generation resources to cover the load, particularly in the Long-Term Transmission Planning Horizon models. In those instances, the TP may choose to model a future expected generating unit, fictitious

\(^7\) TPL-001-4 2.1.2
\(^8\) TPL-001-4 1.1.5
\(^9\) TPL-001-4 1.1.6
generating Facility, or energy imports. The TP will not utilize these options solely to meet Operating Reserves.

Maximum output will be either the value provided by the Generator Owner (GO) in their resource plan or the Network Integrated Transmission Service (NITS) Capacity value posted on the LG&E and KU OASIS plus firm point to point transmission, whichever is lower. Units are dispatched using the Merit Order (MO) provided by the GO.

5.7 Reactive Power Resource Modeling

This section applies to reactive power resource modeling of units connected to the LG&E and KU transmission system.

The reactive power resource capability for the steady state and stability models is supplied by the GO and/or RP to the LG&E and KU Planning Coordinator per the MOD-032 data submittal. The transmission level voltage at the power plants will be regulated in the Base case models to the target voltage in Table 1 of the LG&E and KU Voltage and Reactive Power Schedule (VAR-001) document. The Voltage and Reactive Power Schedules are supplied to the PC from the TOP per the MOD-032 data submittal.

Capacitor banks will be modeled with the actual voltages (or typical settings for future installations) at which the capacitor bank turns on and off for regulating voltage.

5.8 Modeled Facility Ratings

The TP models Facility Ratings as follows:

- Summer Peak - 104°F
- Winter Peak - 23°F
- Off-Peak - 87°F

The LG&E and KU PC has access to the LG&E and KU Transmission Owner Facility Ratings through LOAD database. Generator Owner Facility Ratings are provided to the TP/PC through a MOD-032 data submittal.

5.9 Base Case Series Models

Base case series (BCS) models are developed for Near-Term Transmission Planning Horizon and Long-Term Transmission Planning Horizon for steady state models, where the Near-Term Transmission Planning Horizon are years one through five, and Long-Term Transmission Planning Horizon are years six through ten. Specific models may

10 TPL-001-4 1.1.6
vary from series to series, and may include one or more models for the years in the Near-Term Transmission Planning Horizon and Long-Term Transmission Planning Horizon.

Each BCS model contains a detailed representation of the LG&E and KU Balancing Authority control area from 69 kV through 500 kV.

 Portions of the models outside the LG&E and KU model area are taken from the most recent NERC Eastern Interconnection Reliability Assessment Group (ERAG) Base Case Series. The specific ERAG model used will be the same time-frame as, or a model nearest the time-frame of, the target model being built. LG&E and KU may coordinate models with neighboring TPs, and may alter their Systems in the ERAG models to reflect that coordination.

BCS models will be provided to the ITO for review as soon as available.

The BCS models are the starting point for the annual planning assessment, and are used for TEP development. Stability analysis is not required to be performed on the BCS models, but is performed on TEP models developed later in the Planning Assessment.

5.10 Transmission Expansion Plan (TEP) Models

At the completion of the annual Planning Assessment, TEP projects are identified and timed. A set of TEP models are created for use in future studies with the new TEP projects and retiming of projects. Both steady state and stability TEP models are created. At the completion of the TEP process, the TEP models are delivered to both the Reliability Coordinator (RC) and the ITO.

5.11 Steady State Models

Steady State models are developed for winter On-Peak, summer On-Peak and Off-Peak Load conditions. Transmission base cases for steady state analysis are developed on an annual basis to reflect the most current information and assumptions available concerning the modeling of future years' System load level and load distribution (provided by the LSE), generation (provided by the GO) and the previous year’s TEP.

Steady state models in the Near-Term Transmission Planning Horizon will include summer and winter On-Peak load models for Year One or year two and year five\(^{11}\); at least one Off-Peak model in the Near-Term Transmission Planning Horizon is developed. Long-term Transmission Planning Horizon On-Peak Load models will generally include year ten only. A year ten model is used since it is expected that the loads will be higher than year six through nine models\(^{12}\). At least one summer and winter On-Peak load

\(^{11}\) TPL-001-4 2.1.1
\(^{12}\) TPL-001-4 2.2.1
model for years six through ten will be included. Other models may be developed to support timing of issues associated with significant construction and/or System changes.

5.12 Stability Models

Stability models are developed using the TEP steady state models which include the most recent projects timings. Dynamic models are developed for summer On-Peak and Off-Peak conditions. At least one On-Peak and one Off-Peak model in the Near-Term Transmission Planning Horizon will be developed. Long-term stability models will be developed to address the impact of proposed material generation additions or changes, if any, in that timeframe. If there are no material generation additions or changes, a stability model in the Long-Term Transmission Planning Horizon will not be built. The TEP will include documentation to support the technical rationale for determining generation material changes. A minimum of at least one stability model with maximized generation, utilizing the generation interconnection capacity (GIC) values, within the LG&E and KU BA will be developed. Other stability models may be developed as necessary. If needed, other stability models will be built to meet the requirements of TPL-001-4 R2.4.3.

The LG&E and KU dynamics parameters are also updated to the latest available data. All new dynamics data will be tested to make sure that a dynamics stability for no fault analysis lasting twenty seconds shows flat line voltages and rotor angles.

The stability models for the TEP are dependent on industry dynamic models (e.g. ERAG) developed annually. The models have roots in the previous year’s ERAG steady state models. Although uncommon, it is possible that the current year ERAG models may not be available in time for TEP model development. In this scenario the ERAG dynamic models from the previous year will be utilized for the outside world.

The ERAG stability models are updated within the LG&E and KU BA with the most recent load forecast. Generation levels use merit order and also incorporate Operating Reserves as described in Section 5.6.

The final stability models will match the topology of the steady state models for the LG&E and KU BA. Due to the ERAG Dynamic Model Building process, the outside world may not match between the stability and steady state models.

5.13 Short Circuit Models

LG&E and KU maintains a perpetually updated short circuit model that reflects the current topology of the LG&E and KU Transmission System with Elements and Facilities in their normal status. LG&E and KU participates in the SERC Short Circuit Database Working Group (SCDWG) process in which a SERC regional model is developed.

13 TPL-001-4 2.5
annually, in accordance with the SCDWG procedure manual. The procedure manual requires cases be developed for the Near-Term Transmission Planning Horizon and Long-Term Transmission Planning Horizon and the SCDWG coordinates its schedules with the SERC Multi-Regional Modeling Working Group (MMWG) process. In conjunction with SCDWG process, LG&E and KU incorporates a reduction of the most recent SCDWG near-term model each year to represent the Transmission Network outside LG&E and KU, and also incorporates a current detailed model of East Kentucky Power Cooperative (EKPC) short circuit model during the annual update.

The current short circuit model is used to perform the annual breaker duty study of the current Transmission System\textsuperscript{14}. It will be modified as needed to perform other ad hoc studies, including, where appropriate, replacing the outside world model with a reduced SCDWG long-term model.

The short circuit model is limited to one model in the Near-Term Transmission Planning Horizon and one model in the Long-Term Transmission Planning Horizon.

6 Annual Planning Assessment Per TPL-001-4 R2

LG&E and KU conducts an annual Planning Assessment in order to plan the transmission System to meet TPL-001-4. The annual Planning Assessment includes analysis of both the Near-Term Transmission Planning Horizon and Long-Term Transmission Planning Horizon. The Planning Assessment simulates contingencies for steady state, stability analysis, and short circuit studies\textsuperscript{15}. If there are no material generation additions or changes in the Long-Term Transmission Planning Horizon, a stability study for the Long-Term Transmission Planning Horizon will not be done\textsuperscript{16}.

6.1 Non-BES Annual Assessment

LG&E and KU defines BES to only include those Facilities operated at 100 kV and above. BES transformers are those transformers with a primary and at least one secondary voltage operated above 100 kV. For purposes of this document, LG&E and KU non-BES elements are elements operated at 69 kV and those transformers whose secondary voltage is operated at 69 kV. An annual planning assessment of the 69 kV Elements is performed for the Near-Term Transmission Planning Horizon as well as the Long-Term Transmission Planning Horizon. The non-BES planning assessment only includes contingencies and performance requirements for P0, P1 and P3 of TPL-001-4 Table 1. Stability analysis as well as P2, P4-P7 and extreme events for steady state is not analyzed on non-BES Elements. Non-BES elements are not monitored for steady state analysis of P2, P4-P7 and extreme events for either stability or steady state assessments.

\textsuperscript{14} TPL-001-4 2.3

\textsuperscript{15} TPL-001-4 2.3

\textsuperscript{16} TPL-001-4 2.5
The non-BES annual Planning Assessment may utilize a qualified past study or a current study to meet the requirements of TPL-001-4 Table 1 P0, P1 and P3. If a qualified past study is used, it must meet the requirements of TPL-001-4 2.6. Material changes in determination of a qualified past study would include substantial changes to the System represented in the study. If a qualified past study is used, the study reports will be included as attachments in the TEP.

6.2 Steady State BES Assessment for the Near-Term Transmission Planning Horizon

The Planning Assessment in the Near-Term Transmission Planning Horizon will include steady state analysis of the BES based on computer simulation of contingency events\(^\text{17}\). The study is performed using a computer simulation of planning and extreme events to determine whether the BES meets the performance requirements of TPL-001-4 Table 1\(^\text{18}\). The contingency selection for the planning events is discussed in section 7 of this document. The annual Planning Assessment for the Near-Term Transmission Planning Horizon may utilize a qualified past study or a current study to meet the requirements of TPL-001-4. If used, a qualified past study must meet the requirements of TPL-001-4 2.6. Material changes in determination of a qualified past study would include substantial changes to the System represented in the study. If a qualified past study is used, the study reports will be included as attachments in the TEP or Extreme Event Report. The Near-Term Transmission Planning Horizon assessment will simulate P1 through P7 planning events and extreme events for BES Facilities using the performance requirements of TPL-001-4 Table 1\(^\text{19}\). In the event that the Contingency analyzed does not meet the respective performance requirements of TPL-001-4 Table 1 P1 through P7, a Corrective Action Plan(s) will be developed to ensure that the System meets the required performance requirements. The Corrective Action Plan(s) are documented in the TEP.

The extreme event analysis for Near-Term Transmission Planning Horizon will use the identification of System instability for conditions such as Cascading, voltage instability, or uncontrolled islanding criteria described in section 9. If the extreme event shows potential for System instability, then an evaluation of possible actions designed to reduce the likelihood or mitigate the consequences is conducted and documented in the Extreme Event Report.

\(^\text{17}\) TPL-001-4 R3
\(^\text{18}\) TPL-001-4 3.1
\(^\text{19}\) TPL-001-4 3.2
6.2.1 Steady State Sensitivity Studies for Near-Term Transmission Planning Horizon

The Near-Term Transmission Planning Horizon portion of the steady state analysis will include an assessment of at least one of the following varying conditions:\textsuperscript{20}:

- Real and reactive forecasted Load
- Expected transfers not included in the BCS models
- Expected in service dates of new or modified Transmission Facilities that may or may not have all required approvals.
- Reactive resource capability.
- Generation additions that have not yet completed a large generation interconnection agreement and/or anticipated retirement of generation not yet announced.
- Controllable Loads and Demand Side Management (modeled in selected Off-Peak).
- Duration or timing of known Transmission outages (when outages are known to occur in the Near-Term or Long Term Transmission Planning Horizon).

For the sensitivity portion, the Planning Assessment may utilize a qualified past study or a current study to meet the requirements of TPL-001-4. A qualified past study must meet the requirements of TPL-001-4 2.6. Material changes in determination of a qualified past study would include substantial changes to the System represented in the study. If a qualified past study is used, the study reports will be included in the new TEP. The Near-Term Transmission Planning Horizon steady state analysis sensitivities described above will include P0, P1 and P3 for non-BES Elements. The Near-Term Transmission Planning Horizon steady state analysis sensitivities will include P0 through P7 and extreme events for BES Facilities. Corrective Action Plan(s) do not need to be developed solely to meet the performance requirements for a single sensitivity study in accordance with Requirements TPL-001-4 2.1.4 and 2.4.3.\textsuperscript{21}

6.2.1.1 Study Impacts

Impacts in studies not resulting in Corrective Action Plans, may be identified using the following flow and voltage criteria:

\textsuperscript{20} TPL-001-4 2.1.4
\textsuperscript{21} TPL-001-4 2.7
• The flow on a Facility increases by 1% or more when compared to the base case flow
• The voltage on a Facility increases a high voltage violation by 0.5% or decreases a low voltage violation by 0.5% or more when compared to the base case voltage

Studies not resulting in Corrective Action Plans will have the specific criteria used documented in the study report as part of the TEP.

6.2.2 Unavailable Long Lead Item BES Assessment

A list of BES Equipment with a lead time of one year or more will be identified from the appropriate LG&E and KU department. One winter On-Peak and one summer On-Peak model in the Near-Term Transmission Planning Horizon is developed that model the BES transformers out of service that do not have a spare. Example, if there are three BES transformers that do not have spares, then six additional models are developed, one for each of the three transformers out of service for winter and summer. Other equipment with long lead times and no spares will be included if such exist. A steady state assessment is performed on these unavailable spare transformer models for TPL-001-4 Table 1 Categories P0, P1 and P2. The impact of this possible unavailability on System performance shall be studied as a portion of the Near-Term Transmission Planning Horizon assessment. The result of the assessment of potential unavailable equipment is included in the TEP. Corrective action plans will be developed if necessary.

6.3 Steady State BES Assessment for Long-Term Transmission Planning Horizon

The Planning Assessment in the Long-Term Transmission Planning Horizon will include steady state analysis of the BES based on computer simulation of contingency events. The study is performed using a computer simulation of planning and extreme events to determine whether the BES meets the performance requirements of TPL-001-4 Table 1. The contingency selection for the planning events is discussed in section 7 of this document. The annual Planning Assessment for the Long-Term Transmission Planning Horizon may be supported by a current study and supplemented with a qualified past study to meet the performance requirements of TPL-001-4. At least one winter On-Peak and one summer On-Peak steady state models will be developed for the Long-Term Transmission Planning Horizon. These models are used to simulate P1 through P7 planning events and extreme events for BES Facilities using the performance requirements of TPL-001-4 Table 1. In the event that the Contingency analyzed does not meet the respective performance requirements of TPL-001-4 Table 1 P1 through P7, a

22 TPL-001-4 2.1.5
23 TPL-001-4 R3
24 TPL-001-4 3.1
25 TPL-001-4 2.2
26 TPL-001-4 3.2
Corrective Action Plan(s) will be developed to ensure that the System meets the required performance requirements. The Corrective Action Plan(s) are documented in the TEP.

The extreme event analysis for Long-Term Transmission Planning Horizon will use the identification of System instability for conditions such as Cascading, voltage instability, or uncontrolled islanding criteria described in section 9. If the extreme event shows potential for System instability, then an evaluation of possible actions designed to reduce the likelihood or mitigate the consequences is conducted and documented in the Extreme Event Report.

6.4 Short Circuit Analysis

The short circuit analysis portion of the Planning Assessment shall be conducted annually utilizing one model in the Near-Term Transmission Planning Horizon and one model in the Long-Term Transmission Planning Horizon. The short circuit analysis may utilize a qualified past study or a current study to meet the requirements of TPL-001-4. A qualified past study must meet the requirements of TPL-001-4 2.6. Material changes in determination of a qualified past study would include substantial changes to the System represented in the study. If a qualified past study is used, the study reports will be copied in the TEP.

The interrupting requirements of LG&E and KU circuit breakers must remain within circuit breaker interrupting capabilities. LG&E and KU calculates circuit breaker interrupting duty utilizing a recognized industry standard software application for short circuit analysis. The software calculates the breaking currents using procedures recommended by ANSI/IEEE.

Breaker duty studies are performed with all Transmission Facilities, and all generators in service. Studies are performed on the Transmission System in its current topology at least annually, and internal ad hoc studies are performed as necessary to determine short circuit impacts of projects under consideration. For ad hoc studies, the model will be modified to simulate as accurately as possible the Transmission System configuration when the project is expected to go into service.

In service circuit breakers with fault duties in excess of interrupting capabilities will have a TEP project for breaker replacement. The project schedule will follow the rules of TEP project schedule considering lead times necessary to complete breaker replacements. When the scheduled date is beyond the need date for a breaker replacement, the first corrective action tested will be to disable automatic reclosing. If the breaker duty still exceeds the breaker interrupting capability additional corrective action measures will be tested. A corrective action plan which mitigates all criteria violations will be documented in the TEP report. The TEP report will list short circuit study deficiencies and the associated actions needed to achieve the required System performance.

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27 TPL-001-4 2.8
28 TPL-001-4 2.8.1
will include a list of breaker replacements required so as not to overload the breaker duty rating. The list of breaker replacements will be reviewed in subsequent annual Planning Assessments for continued validity and implementation status of identified System Facilities and Operating Procedures\textsuperscript{29}.

6.5 Near Term Transmission Planning Horizon Stability BES Assessment

Per TPL-001-4 R4, the Near-Term Transmission Planning Horizon Stability Assessment will only be analyzed for BES Facility disturbances. Only BES Facilities will be monitored for the performance requirements of TPL-001-4. The stability assessment will include TPL-001-4 P1 through P7 planning events and extreme events\textsuperscript{30}. For the stability portion of the Planning Assessment, the Near-Term Transmission Planning Horizon may utilize a qualified past study, five calendar years old or less, or a current study to meet the requirements of TPL-001-4\textsuperscript{31}. A qualified past study must meet the requirements of TPL-001-4 2.6. Material changes in determination of a qualified past study would include substantial changes to the System represented in the study. If a qualified past study is used, the study reports will be copied in the TEP and/or Extreme Event Report. Documentation to support the technical rationale for determining material changes will also be included in the TEP.

TPL-001-4 Table 1 P1 through P7 faults on the near-term models shall be analyzed. The respective performance requirements of P1 through P7 will be used as well as the performance requirements of section 8 in these planning guidelines. Where a fault does not pass the respective performance requirements, a Corrective Action Plan will be developed to ensure the problem is mitigated and therefore meeting the performance requirements. The Corrective Action Plan(s) are documented in the TEP.

Stability analysis will be performed on the following models:

- At least one near-term Off-Peak Load model\textsuperscript{32}
- At least one near-term On-Peak Load model

These models will represent the expected dynamic behavior of Loads that could impact the study area, considering the behavior of induction motor Loads\textsuperscript{33}. The model uses an aggregate System Load model which represents the overall dynamic behavior of the Load.

\textsuperscript{29} TPL-001-4 2.8.2  
\textsuperscript{30} TPL-001-4 4.1 and 4.2  
\textsuperscript{31} TPL-001-4 2.4  
\textsuperscript{32} TPL-001-4 2.4.2  
\textsuperscript{33} TPL-001-4 2.4.1
6.5.1 BES Stability Sensitivity Studies for Near-Term Transmission Planning Horizon

The annual assessment for the Near-Term Transmission Planning Horizon portion of the stability analysis shall be performed for at least one of the following varying conditions:

- Load level, Load forecast, or dynamic Load model assumptions
- Expected transfers not previously included in the stability models
- Expected in service dates of new or modified Transmission Facilities that may or may not have all required approvals.
- Reduced reactive resource capability.
- Generation additions that have not yet completed a large generation interconnection agreement and/or anticipated retirement of generation not yet announced.

For the sensitivity portion, the Planning Assessment may utilize a qualified past study or a current study to meet the requirements of TPL-001-4. A qualified past study must meet the requirements of TPL-001-4 2.6. Material changes in determination of a qualified past study would include substantial changes to the System represented in the study. If a qualified past study is used, the study reports will be copied in the TEP and/or extreme event report. The near-term stability analysis sensitivity will include P1 trough P7 and extreme events for BES Facilities only. Corrective Action Plan(s) do not need to be developed solely to meet the performance requirements for a single sensitivity study analyzed in accordance with TPL-001-4 2.1.4 and 2.4.1.35 A corrective action plan is required for performance deficiencies identified in multiple sensitivity studies or a rationale for why actions were not necessary will be provided.36

6.6 Stability BES Assessment for the Long-Term Transmission Planning Horizon

Per TPL-001-4 R4 the Long-Term Transmission Planning Horizon Stability Assessment will only be analyzed for BES Facility disturbances. Only BES Facilities will be monitored for the performance requirements of TPL-001-4. If there are proposed material generation additions or changes in the Long-Term Planning Horizon timeframe, the Stability analysis portion of the Long-Term Transmission Planning Horizon will be analyzed on at least one model. If there are no proposed material generation additions or changes in the Long-Term Transmission Planning Horizon, a stability assessment will not

34 TPL-001-4 2.4.3
35 TPL-001-4 2.7
36 TPL-001-4 2.7.2
be performed in that time frame. The stability assessment may utilize a qualified past study or a current study to meet the requirements of TPL-001-4. A qualified past study must meet the requirements of TPL-001-4 2.6. Material changes in determination of a qualified past study would include substantial changes to the System represented in the study. The material changes may or may not include proposed generation that does not have a signed large generation interconnection agreement. The long-term model will include proposed transmission Elements and Facilities. The stability analysis will include TPL-001-4 Table 1 P1-P7 and extreme events. Where analysis does not pass the performance requirements of TPL-001-4 Table 1 P1 through P7, a Corrective Action Plan will be developed to ensure the problem is mitigated meeting the performance requirements. Additionally, extreme event analysis will use the identification of System instability for conditions such as Cascading, voltage instability, or uncontrolled islanding criteria described in section 9. If the extreme event shows a potential for System instability, then an evaluation of possible actions designed to reduce the likelihood or mitigate the consequences is conducted and documented in the Extreme Event Report.

### 6.7 Other Studies

Sensitivity studies described in sections 6.2.1 and 6.5.1 are performed on models for the Near-Term Transmission Planning Horizon only. There are other studies, described below, performed on both the Near-Term Transmission Planning Horizon and the Long-Term Transmission Planning Horizon models. Impacts will be identified in these studies through the process described in section 6.2.1.1. The studies could include, but are not limited to:

- **TSR Study:** Confirmed firm TSRs that were not included at maximum level in the BCS models, are modeled in the appropriate time frame. The TSRs have to be firm and have a contract period of at least one year. This study ensures that these TSRs can be served. Only steady state analysis for P0, P1, P2 EHV only, P3, P4 EHV only planning events is simulated. Corrective Action Plans will be developed for criteria violations identified. This will include operating guides for criteria violations associated with TSRs with a contract period of less than five years.

- **NITS Capacity:** The NITS capacity analysis evaluates the adequacy of the transmission system for P0 (system intact) conditions while modifying generator PMax values to their NITS capacity values. The NITS capacity values are posted on the LG&E and KU OASIS site. When the PMax values are modified, generation is re-dispatched in merit order. Operating reserve requirements are also taken into consideration when possible. Corrective Action Plans will be developed for criteria violations identified.

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37 TPL-001-4 2.6
7 Contingencies

The contingencies of TPL-001-4 Table 1 P1 through P7 and extreme events simulated for the assessment will only include those that are expected to produce more severe System impacts on the LG&E and KU portion of the BES\textsuperscript{38}. The list of Contingencies being simulated is included in appropriate TEP and Extreme Event reports.

Category P1-5, P3-5, P6-4, and P7-2 refer to HVDC outages. There are no HVDC lines within or near the LG&E and KU BA that affect the LG&E and KU System. The Planning Assessment does not evaluate HVDC contingencies and no P1-5, P3-5, P6-4, or P7-2 contingencies are simulated in either the steady state or stability analyses.

7.1 Contingency List Coordination

Per TPL-001-4 3.4.1 and 4.4.1, LG&E and KU Transmission Planner (TP) will coordinate with adjacent Planning Coordinators (PCs) and TPs to ensure that Contingencies on adjacent Systems which may impact the LG&E and KU System are included in the Contingency list. The LG&E and KU BES Contingency list will be shared with the LG&E and KU neighbor TP with a request for the neighbor TP to recommend contingencies in its System that should also be evaluated in the LG&E and KU Planning Assessment. All contingencies recommended by neighboring TPs and/or PCs will be assessed for inclusion in the LG&E and KU Contingency list to be included for evaluation in the LG&E and KU annual Planning Assessment.

7.2 Generation Replacement Scenarios

To maintain the capability to serve native load after loss of a generator, for an LG&E and KU generator owner outage greater than 50 MW, replacement generation shall be simulated from the most restrictive combination of internal resources, Tennessee Valley Authority (TVA), Midcontinent Independent System Operator (MISO) or PJM. Generator contingencies are selected that produce the most severe System impacts on the BES and may be used to limit the number of generator outage and replacement generation scenarios, such as the largest unit per plant, or BES voltage connection point.

For non LG&E and KU owned generator unit outages greater than 50 MW connected to the LG&E and KU transmission system, replacement generation to cover non LG&E and KU load will be simulated from TVA, MISO or PJM whichever is the most restrictive. Generator contingencies are selected that produce the most severe System impacts on the BES and may be used to limit the number of generator outages, such as the largest unit per plant, or BES voltage connection.

\textsuperscript{38} TPL-001-4 3.4
For non-affiliate generator units, posted as DNRs on OASIS, and not connected to the LG&E and KU transmission system, replacement generation to cover non LG&E and KU load served from the LG&E and KU system will be simulated from other associated DNRs as available, and replacement generation to cover non LG&E and KU load will be simulated from TVA, MISO or PJM whichever is the most restrictive unless customer discussions indicate that some of these scenarios are not needed. If replacement generation is not available in a specific model, the dispatches will not be simulated.

For generator outages greater than 50 MW and not connected to the LG&E and KU transmission system replacement generation will be simulated from an area on the opposite side of the generating unit area from the LG&E and KU system. Generator contingencies are selected that produce the most severe System impacts on the BES and may be used to limit the number of generator outages, such as the largest unit per plant, per BES voltage connection.

In addition to LG&E and KU generator unit outages with replacement power as described above, analysis will consider certain dispatch scenarios with replacement from plants simulating maximum output level at the replacement site. Valid scenarios will be outages of single units greater than 200 MW, with replacement power sourced by maximizing the output at either Trimble County or Brown. If the site chosen for replacement power has inadequate available resources (i.e. less than the outaged unit), that particular scenario is not valid. Any excess created by maximizing plant output, after netting with the outaged unit, will be offset by proportionally reducing all other LG&E and KU units not directly involved. Generator contingencies are selected that produce the most severe System impacts on the BES and may be used to limit the number of generator outages, such as the largest unit per plant per BES voltage connection.

7.3 Automatic Control Inclusion

The simulated contingencies must remove all elements that the Protection System and other automatic controls are expected to disconnect for each Contingency without operator intervention.

The LG&E and KU System does not currently have any Special Protection Systems. Simulations of Protection System responses during a fault or Contingency are analyzed with that Contingency. The LG&E and KU BA does not have any generation tripping or run back scheme other than what would be tripped as a result of clearing a fault. If generation is tripped as a result of fault clearing, then that tripping scheme will be studied as part of the Contingency analyzed.

Per TPL-001-4 3.3.1.1, LG&E and KU will build a project to ensure that generators do not trip due to low voltage on the generator bus after a P1 or P3 planning event. The minimum generator steady state or ride through voltage limit is 0.95 pu at the generator

39 TPL-001-4 3.3.1 & 4.3.1
bus. Tripping of generators will be included in the simulation by running the simulation manually if the screen result indicates the generator bus voltage falls below 0.95 pu for a P2, P4 through P7 and extreme events.

7.3.1 Steady State Automatic Control Inclusion

If the results of the steady state analysis show an overload of Facility (ies), prior to loss of load if allowed by TPL-001-4 Table 1, a verification of the relay loadability values is completed. Verification is done via the CASCADE database or through communication with the Protection department. If the MVA flow on a BES Facility exceeds the relay loadability setting, the steady state simulation will include the outage of that Facility that exceeds the relay loadability setting.

The LG&E and KU transmission System does not contain any phase-shifting transformers. There are switched capacitors on the LG&E and KU transmission System and those facilities are modeled with the voltage levels at which they are switched on and off\(^{40}\). Transmission capacitor status (on/off) are simulated consistent with automatic voltage control (on/off) settings and operating practice during normal transmission System conditions. Therefore, when the solution of the power flow analysis has capacitor bank switching enabled, the automatic switching of capacitor banks are simulated.

7.3.2 Stability Assessment Protection System Inclusion

Per TPL-001-4 4.3.1.1 the stability simulation will include successful high speed (less than one second) reclosing and unsuccessful high speed reclosing into a Fault where high speed reclosing is utilized.

Per TPL-001-4 4.3.1.2 the stability simulations will include the tripping of generators where simulations show generator bus voltages or high side of the GSU voltages are less than known or assumed generator low voltage ride through capability. If assumptions are made they will be included in the TEP report.

7.4 Load Restoration and Switching Procedure.

During breaker to breaker outages, some Consequential Load loss is possible. The simulation of the load restoration and switching procedure is performed as part of the Planning Assessment. Post-fault conditions and conditions after load restoration, switching, or transmission reconfiguration should be evaluated. Post-Contingency operator-initiated actions to restore load service are simulated. Post-contingency operator-initiated actions including switching may be simulated to reduce the flow through transformers or increase voltages but not to reduce line flows. Load that is off-

\(^{40}\) TPL-001-4 3.3.2
line as a result of the Contingency (consequential load loss) being evaluated may be switched to alternate sources during the restoration assessment, but load is not taken off-line to perform switching.

7.5 Steady State Planning Events

The steady state Planning Assessment studies are performed based on a Contingency list created to meet requirements of TPL-001-4 R3. The Contingency list includes those planning events in TPL-001-4 Table 1 that are expected to produce more severe System impacts on its portion of the BES. Since the Contingency list that produces the most severe events may vary year to year of the planning assessment, the Contingency list will be documented in the TEP. This section of the Planning Guidelines will document the methodology used to develop the Contingency list which will produce the most severe System impacts.

The Extreme Event Report will also list those contingencies analyzed and expected to produce more severe System impacts. The extreme event analysis may utilize a qualified past study or a current study to meet the requirements of TPL-001-4. A qualified past study must meet the requirements of TPL-001-4 2.6. Material changes in determination of a qualified past study would include substantial changes to the System represented in the study.

7.5.1 TPL-001-4 Table 1 Category P1 Contingency Selection

TPL-001-4 Table 1 Category P1 is single contingencies including loss of generator, transmission circuit, transformer, or shunt device. The LG&E and KU Planning Assessment includes all single transmission circuits and transformers that are operated at 69 kV (secondary voltage) and above. In order to achieve the removal of all elements that the Protection System and other automatic controls are expected to disconnect for each Contingency without operator intervention all breaker to breaker contingencies for transmission circuits and transformers are simulated for Category P1 events

The single generator Contingency (ies), includes single generator units connected to the LG&E and KU System and simulates an outage of the largest generator at each transmission bus. The largest generator at a bus is considered to produce more severe System impacts than smaller units connected to the same bus. Similarly, single generator contingencies not connected to the LG&E and KU System, but that are in close proximity are also simulated by taking the outage of only the largest unit at a plant site.

7.5.2 TPL-001-4 Table 1 Category P2 Contingency Selection

- Opening a line section without a fault: All line section outages of BES Facilities will be simulated to ensure the performance requirements of TPL-001-4 Table 1.

41 TPL-001-4 3.3.1
- **Bus Section Fault:** Many LGE&E/KU BES substations are designed with a breaker and a half or ring bus design. A bus section fault for a ring bus results in the same Contingency as P1, while a bus section fault of a breaker and a half design results in no transmission circuit outage or a P1 outage depending on the location of the bus. Therefore, the only Bus Section Faults analyzed for Category P2 are the BES buses that have a straight bus design. All BES Facilities in a straight bus configuration are simulated for Category P2-2.

- **Internal Breaker Fault (non-Bus-tie Breaker):** An internal breaker fault means a breaker failing internally, thus creating a System fault which must be cleared by protection on both sides of the breaker. An internal breaker fault on a ring bus design is a double Contingency of the two Facilities that share a breaker in the ring. An internal breaker fault on a breaker in a breaker and a half design, results in a double Contingency of the two Facilities that share a breaker in the same bay. Therefore the internal fault contingencies simulated are those double contingencies for BES Facilities that share a breaker for either a ring bus or breaker and a half design. An internal breaker fault for a breaker on a straight bus will be simulated when the fault causes more than just a disconnected bus, like an internal breaker fault where the breaker protects a three terminal line.

- **Internal Breaker Fault (Bus-Tie Breaker):** An internal breaker fault means a breaker failing internally, thus creating a System fault which must be cleared by protection on both sides of the breaker. This contingency results in opening all breakers connected to both buses connected by the bus-tie breaker. All of the internal breaker faults for bus-tie breakers are simulated.

### 7.5.3 TPL-001-4 Table 1 Category P3 Contingency Selection

Category P3 includes the loss of a single generator unit, as described in section 7.5.1, followed by system adjustments. After system adjustments, all P1 contingencies are simulated. This includes generator, transmission circuit, transformer, and shunt device contingencies. For P3 events, LG&E and KU runs all single contingencies of 69 kV and above combined with a generator outage described in section 7.2. LG&E and KU also runs combinations of two generator outages.

### 7.5.4 TPL-001-4 Table 1 Category P4 Contingency Selection

Category P4 contingencies in steady state are multiple contingencies caused by a stuck breaker or relay failure where backup clearing is required to clear a fault.

### 7.5.5 TPL-001-4 Table 1 Category P5 Contingency Selection
The contingencies for TPL-001-4 Table 1 Category P5 are simulated after the stability studies are performed. The stability analysis identifies which breakers will open for a category P5 event. The contingency selection is determined by the stability analysis (refer to 2nd paragraph on page 27).

7.5.6 TPL-001-4 Table 1 Category P6 Contingency Selection

The following are criteria for contingencies selected of Category P6 that produce more severe System results or impacts. All tested BES contingencies are analyzed to determine impacts on BES Facilities remaining in-service. When a BES Contingency shows an impact on any BES Facility remaining in-service, that Contingency will be paired with any other BES Contingency that impacts the same in-service BES Facility. Category P6 contingencies include transmission circuit, transformer, and shunt devices. LG&E and KU does not currently have any shunt devices on the BES, but if/when any are installed, they will be added to the contingency list.

The contingencies selected that produce the most severe results in steady state are not always the same as those selected for stability analysis. LG&E and KU's Contingency Selection Criteria describes the rationale for Contingency selection that is consistent with TPL-001-4 R3 and is considered to produce more severe System results or impacts.

7.5.7 TPL-001-4 Table 1 Category P7 Contingency Selection

LG&E and KU maintains a list of adjacent circuits greater than one mile in length that reside on a common structure. Loss of all BES double circuit Facilities that reside on a common structure are simulated for Category P7.

7.6 Steady State Extreme Events

LG&E and KU simulates the System performance for extreme events in TPL-001-4 Table 1 extreme events. The extreme events are selected that are expected to produce more severe System impacts. When LG&E and KU evaluates in steady state the performance of Category P6, there are no System adjustments after the first Contingency. Therefore, the P6 planning event is the same as the extreme event steady state part 1. The extreme events that are simulating in the TPL performance assessment include:

- Loss of a tower line that has three or more BES circuits when the common structure lines are more than one mile in length.

- Loss of all BES transmission lines on a common Right-of-Way when the common right of way is longer than one mile in length.
• Loss of a substation (one BES voltage level plus transformers) which are analyzed in the TEP process. A list of substations selected for this extreme event using will be included in the TEP report.

• Loss of all generating units at a station which is analyzed in the TEP process includes only the largest generation sites greater than 500 MW total generation capability in the LG&E and KU System.

• Loss of a large load or major load center which is analyzed in the TEP process includes tripping the load from the LG&E and KU largest single customers. This also includes large municipal loads.

• Loss of all gas-fired generation (two plants) served by a common large gas pipeline.

• Loss of two large generating stations in close proximity due to severe weather (e.g. tornado)

7.7 Stability Planning Events

The Stability portion of the Planning Assessment shall be performed for planning events to meet performance requirements in TPL-001-4 Table 1. The stability portion of the Planning Assessment will only do analysis of disturbances on BES Facilities. The stability analysis shall use a current or qualified past study per TPL-001-4 2.6.

7.7.1 Category P1 Stability Disturbances Analyzed

Category P1 disturbances are selected to comply with NERC reliability standards including faults on generators, Transmission Circuits, and Transformers. Three phase faults with normal clearing (assumed six cycles) are initially analyzed for breaker to breaker BES Facilities in the stability model. A clearing time of six cycles is a worst case assumed clearing time. In the event that a Category P1 disturbance does not meet the performance requirements of TPL-001-4 Table 1, the Protection group is contacted to acquire the actual clearing time. The disturbance is re-simulated with the actual clearing time.

7.7.2 Categories P2 through P7 Stability Disturbances Analyzed

TPL-001-4 Table 1 Categories P2 through P7 disturbances are selected such that only the disturbances that produce the more severe System results or impacts are analyzed.\textsuperscript{42} Categories P4-P7 stability disturbances may not be analyzed annually. A past study can be used per TPL-001-4 2.6 if there has not been a material change. Material changes in

\textsuperscript{42} TPL-001-4 4.4
determination of a qualified past study would include substantial changes to the System represented in the study. When a past study is used, a new study would be required a minimum once every five years.

Opening a line section, generator, transformer or shunt device without a fault: These disturbances are less severe to the BES compared to simulating a fault and then opening the line section, generator, transformer or shunt device in order to clear a fault (P1). The FAC-010 standard requires these contingencies. Therefore, the following will be simulated to accommodate FAC-010 requirements.

- Trip Trimble County #2 without a fault
- Open Trimble – Clifty 345 kV line without a fault
- Open one of the Trimble County 345/138 transformers without a fault

Bus Fault Contingency Selection: Bus faults are selected on buses which are generation points of interconnection except those that are interconnected in a breaker and a half design or ring bus design. The breaker and a half and ring bus schemes are designed for more reliable operation of a bus section disturbance. So faults on a breaker and a half scheme and ring bus are considered less severe. Disturbances are analyzed for straight bus designs.

Internal breaker faults: Internal breaker three phase faults are analyzed instead of the less severe single line to ground fault. These are analyzed on breakers considered to be more critical as documented in the TEP. The breaker and a half and ring bus schemes are designed for more reliable operation of a bus section disturbance. So faults on a breaker and a half scheme and ring bus are considered less severe. Therefore, internal breaker faults are analyzed for straight bus designs. Three phase faults are initially analyzed and if performance requirements are not met, then the less severe single line to ground fault is studied. Breakers are selected for internal fault or breaker failure, relay failure disturbances for Categories P2, P4 and P5 which are considered to produce the most severe results or impacts to the reliable operation of the BES.

Category P3 starts with loss of a generator followed by “manual System adjustments” or replacement of the generation by another available source. Then a selected list of worst case BES Category P1 disturbances including breaker to breaker contingencies are analyzed on the generator outage model. The list includes faults one bus away from high side of the BES generators.

Category P4 and P5 Contingency Selection: For Category P4 and P5 three phase faults with a delayed clearing of 20 cycles, or worst case assumption, are analyzed on specific breakers. A more severe three phase fault is initially analyzed. If the three phase fault does not meet the performance requirements for P4 and P5, then the less severe single line to ground fault is analyzed. The stuck breakers selected are those that are expected to produce the most severe System results or impacts. In the event that a three phase fault with delayed clearing fails the performance requirements of TPL-001-4 Table 1, the Protection group is contacted to acquire the actual clearing times. The event is then re-
simulated with the actual clearing times and using a single line to ground fault instead of a three phase fault. This analysis satisfies the requirements of P4, P5 and when required, extreme events. For P5 on a fault plus relay failure to operate, contingencies are selected based on selection criteria from FERC Order 754.

Category P6 Contingency Selection: The n-2 BES contingencies are selected which produce the more severe System impacts of the BES. The rationale used to determine the more severe n-2 contingencies will be documented in the TEP report. The simulation uses a prior outage model followed by manual adjustments. Those manual adjustments can include generation re-dispatch, loss of firm transmission service and non-consequential load loss. Then after these adjustments, three phase faults are analyzed using the same faults as selected for P1 contingencies. The list of prior outages used as the initial condition is documented in the TEP Report.

Category P7 Contingency Selection: LG&E and KU maintains a list of BES transmission lines that are on common towers of greater than one mile in distance. Category P7 disturbances are analyzed by introducing a three phase fault on both lines of the common tower line at the same time with the appropriate clearing time for each line. The normal clearing and reclosing time (if high speed reclosed in less than one second) is simulated. For the common tower P7 disturbance, there are no manual System adjustments after one Contingency. The analysis is performed using two faults occurring at the same time in the stability analysis.

7.8 Stability Extreme Event Assessment

The stability portion of the Planning Assessment will perform studies to assess the impact of the extreme events of TPL-001-4 Table 1\(^{43}\). The events selected for evaluation are those that are expected to produce more severe System impacts. This section describes the rationale for the Contingencies selected for stability extreme events. If the Stability portion of the Planning Assessment for extreme events concludes there is instability (see section 9) caused by the occurrence of extreme events, an evaluation of possible action designed to reduce the likelihood or mitigate the consequences of the event will be conducted. This evaluation will be documented in the Extreme Event Report.

Protection Systems, including planned backup or redundant Systems, are accounted for in the analysis of breaker failure, internal fault of a breaker with delayed clearing contingencies. Redundant protection Systems may be a mitigating project when delayed clearing contingencies do not meet the performance requirements of the reliability standards.

Extreme Event Contingency Selection: Extreme events that are expected to produce more severe System impacts shall be identified. A three phase fault on a generator, transmission circuit, transformer, bus section with a stuck breaker, or relay failure

\(^{43}\) TPL-001-4 4.5
resulting in delayed clearing: These disturbances are analyzed during the analysis for Categories P5 and P6 planning events. If the results of the P5 and P6 analysis do not meet the performance requirements P5 and P6 of TPL-001-4 Table 1, then the less severe single line to ground fault is analyzed. The performance of the three phase fault is then checked for potential instability (see section 9). The stuck breaker list for P5 and P6 contingencies are breakers that are located at BES buses that are also generator points of interconnection at sites with more than 500 MW of total generation capacity. Additionally, other non-generation point interconnection BES buses are included in the stuck breaker selection for Category P5 and P6 disturbances using the stuck breaker contingencies that will produce the more severe System impacts on the BES.

The selection of buses for analysis of the extreme event for a three phase fault on a bus with a stuck breaker analyzes those buses which are a generation point of interconnection except those that are interconnected in a breaker and a half scheme. The breaker and a half scheme is designed for more reliable operation of a bus section disturbance. So faults on a breaker and a half scheme are considered less severe.

The extreme event or three phase internal fault on a breaker is analyzed for the Category P2 less severe planning event using performance requirement for P2 of TPL-001-4 Table 1. If the performance requirements for the planning event are met, no additional work is required, since both the planning and extreme event pass the performance requirements of the planning event. If the extreme event does not pass the performance requirements of the planning event, the less severe single line to ground fault is simulated. The extreme event is then checked for potential instability (see section 9). Breakers are selected for internal fault and breaker failure disturbances, Category P2 which are considered to produce the most severe results or impacts to the reliable operation of the BES. The breakers selected for P2 contingencies are located at BES buses that are also generator points of interconnection at sites with more than 500 MW of total generation capacity. Additionally, other non-generation point of interconnection BES buses are included in the breaker selection for P2 disturbances using bus contingencies that will produce the more severe System impacts on the BES.

8 Performance Requirements

This section documents acceptable System steady state voltage limits, thermal limits, and the transient stability performance requirements for the LG&E and KU System. Additionally performance requirements for P0 through P7 and extreme events described in TPL-001-4 Table 1 are included in the Planning Assessment TEP report.

Specific criteria for P1 planning events will be tested for TPL-001-4 4.1.1; P2 through P7 performance requirements in 4.1.2 and P1 through P7 performance requirements in 4.1.3.

8.1 Special Protection System

44 TPL-001-4 R5
The LG&E and KU does not currently own or operate any Special Protection System (SPS) or Remedial Action Scheme in order to comply with the TPL Standards or these Planning Guidelines. Neither SPSs nor remedial action schemes should be considered when developing the Corrective Action Plan(s).

### 8.2 Steady State Voltage Performance Criteria

Per TPL-001-4 R5, the following is the steady state voltage criteria: A steady state System voltage violation will occur when the percent nominal voltage, rounded to one decimal place, is outside the applicable performance requirements.

The following are detailed voltage criteria for each of the TPL-001-4 Table 1 Categories.

1. **Category P0** with all Elements and Facilities in service, the LG&E and KU Elements and Facilities of 69 kV and above shall perform within the following:
   - The minimum acceptable voltage criteria for Facilities of 69 kV (load serving buses) and above are 94 percent of their nominal value. The maximum voltage criteria of any 500 kV System bus should not exceed 110 percent of the nominal value. All other transmission Elements and Facilities 69 kV to 345 kV should not exceed 105 percent of the nominal value.

2. **Category P1** and **P3** voltage criteria:
   - The minimum acceptable voltage criteria for Elements 69 kV (load serving buses) and above are 90 percent of their nominal value. The maximum voltage criteria of any 500 kV System bus should not exceed 110 percent of the nominal value. All other transmission Elements and Facilities 69 kV to 345 kV should not exceed 105 percent of the nominal value.
   - The minimum generator steady state or ride through voltage limit is 0.95 pu at the generator bus after a P1 or P3 planning event.
   - Load shed using TPL-001-4 footnote 12 is not used as a mitigation for P1 and P3 planning events.

3. **Category P2**, **P4** through **P7**: Additional criteria for P2, P4 through P7 events which limit how much Non-Consequential Load Loss can be shed in order to meet the performance requirements of TPL-001-4 Table 1.
   - Where Non-Consequential Load Loss is allowed in TPL-001-4 Table 1, minimal load shed up to ten percent of the LG&E and KU Balancing Area

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46 TPL-001-4 4.1.3
load as modeled for P2, and P7 planning events; minimal load shed up to five percent for P4, P5 and P6

- Interruption of Firm Transmission Service when permitted by TPL-001-4 HV.
- After allowed Non-Consequential Load Loss and interruption of Firm Transmission Service, the minimum acceptable voltage criteria for BES Facilities is 90 percent of their nominal value. The maximum voltage criteria of any 500 kV System bus should not exceed 110 percent of the nominal value. All other BES Facilities below 500 kV should not exceed 105 percent of the nominal value.
- Load shed using TPL-001-4 footnote 12 is not used as a mitigation for P2, P4 through P7 planning events.

4. Steady state extreme events: Extreme events are only checked against the criteria in section 9.1 of these planning guidelines.

8.2.1 Steady State Thermal Facilities Limits

The applicable Facility Rating for TPL-001-4 Table 1 Category P0 is the seasonal normal Facility Rating. The applicable Facility Rating for TPL-001-4 Table 1 Categories P1 through P7 is the seasonal emergency rating. The recorded circuit flow will be the maximum MVA flow of either end. The recorded transformer flow on two-winding transformers will be the “design output” flow where step-down transformers will be measured at the low-voltage side and System tie transformers will be measured on the side where the MW flow exits the transformer. The loading of GSU transformers and all other equipment attached to and associated with generators are the responsibility of the generator owner; therefore they will not be monitored as part of the transmission planning assessment.

8.3 Transient Stability Performance Requirements

Transient stability studies shall be performed to meet TPL-001-4 Table 1 performance requirements. The System must remain stable per identification of System instability per Section 9 for TPL-001-4 Table 1 Categories P1 through P7 events. It is important to note that this criterion is applied when using an Inductive Motor Load model.

8.3.1 Angular Stability

The angular stability criteria for a generator are defined as: a generator rotor angle must remain less than 180 degrees with respect to the relative angle. LG&E and KU chooses the TVA’s Brown Ferry, a nuclear unit, as the relative machine.
8.3.2 Damping Criteria

For TPL-001-4 Table 1 Categories P1-P7 Power Oscillations shall exhibit acceptable damping as established by the Planning Coordinator and Transmission Planner\textsuperscript{46}. This damping criteria is: The angular variation of a machine must be tested showing visual damping for a five second run. If the angular variation is not visually damped after the five second run, a 20 second run will be completed. If after the 20 second simulation, the angular variation is still not visually damped, then the System will be determined to be unstable. LG&E and KU examines the stability plots as part of the Stability analysis.

8.3.3 Voltage Ride Through Criteria

Tripping of a generator will be simulated when the generator bus voltages or high side of the GSU voltages are less than known or assumed generator low voltage ride through capability. The acceptable limit of LG&E and KU BA generator tripping is 3500 MW.

8.3.4 TPL-001-4 Table 1 Categories P1 Generator Synchronism

For TPL-001-4 Table 1 Category P1: No generating unit shall pull out of synchronism. A generator being disconnected from the System by fault clearing action or by a Special Protection System (SPS) is not considered to be pulling out of synchronism\textsuperscript{47}. LG&E and KU does not currently have an SPS.

8.3.5 TPL-001-4 Table 1 Categories P2-P7 Generator Synchronism

For TPL-001-4 Table 1 Category P2 through P7: Tripping of generating units will be simulated when the analysis indicates that a unit(s) is pulling out of synchronism. The acceptable limit for total (consequential and non-consequential) generation loss is 3500 MW.

8.3.6 TPL-001-4 Table 1 Categories P1 and P3 Transient Voltage Stability Performance Requirements:

Per TPL-001-4 R5, the following is the transient voltage stability criteria for P1 and P3 events: LG&E and KU’s transmission System voltage must recover to 0.8 p.u. within 4 seconds after the fault is cleared. Generation that trips as a result of low voltage at the auxiliary load bus described in Section 8.3.3 is not a violation of these criteria unless the criteria in Section 8.3.3 is violated. TPL-001-4 Table 1 Categories P1 and P3 stability faults must also pass the angular and damping stability performance requirements described in this section.

\textsuperscript{46} TPL-001-4 4.1.3
\textsuperscript{47} TPL-001-4 4.1.1
8.3.7 TPL-001-4 Table 1 Categories P2, and P4-P7 Transient Voltage Stability Performance Requirements:

Per TPL-001-4 R5, the following is the stability voltage criteria for P2 and P4-P7 events: These disturbances are less probable and may involve loss of some non-consequential load (when allowed by TPL-001-4) and/or generation tripping within the LG&E and KU control area. Generation that trips as a result of the low voltage at the auxiliary load bus as described in Section 8.3.3 is not a violation of these criteria unless the criteria in Section 8.3.3 is violated. These disturbances must pass the angular and damping stability performance requirements described in this section. Within 4 seconds after a fault is cleared, there cannot be more than 6 BES buses with voltages less than 0.80 pu.

8.4 Extreme Events Stability Performance Requirements:

Stability disturbances for TPL-001-4 Table 1 extreme events are analyzed for those contingencies that would produce more severe System results or impacts. If the analysis concludes there is potential instability per Section 9, caused by the occurrence of the extreme events, an evaluation of the possible actions designed to reduce the likelihood of or mitigate the consequences and adverse impacts of the event(s) will be conducted.

9 System Instability Criteria Methodology

As required by TPL-001-4 R6 this section defines and documents the criteria or methodology used in the analysis to identify System instability for conditions such as Cascading, voltage instability, or uncontrolled islanding. It is the intent of the Planning Assessment to identify potential System instability before that instability actually occurs giving some margin in the assessment. The identification of potential instability in the power System simulation is different between the steady state study and the stability study.

9.1 Cascading, Voltage Instability, or Uncontrolled Islanding Identification in Steady State Simulations

For steady state power flow analysis, instability could result after one or more of the following occurs:

- Load Loss: Loss of 10% of the LGEE (area 363) load in the appropriate model.
9.2 Instability Identification for Stability or Dynamics Simulations

For purposes of these planning guidelines, instability includes dynamic instability, Cascading, voltage instability, or uncontrolled islanding. For dynamics analysis, instability could result after one or more of the following occurs:

- The event is considered to be uncontrolled if, for a grid event on the LGEE BA, the total non-consequential generation loss is more than one plant located external to the LGEE BA, or if the total (consequential and non-consequential) loss of LGEE BA generation is greater than 3500 MW.
- 4 seconds after a fault is cleared, there exists more than six BES Facilities whose voltages are below 0.8 p.u.
- Violation of damping criteria per section 8.3.1

10 Corrective Action Plan(s)

For planning events shown in TPL-001-4 Table 1, when the analysis indicates an inability of the System to meet the performance requirements in TPL-001-4 Table 1, the Planning Assessment shall include Corrective Action Plan(s) addressing how the performance requirements will be met\(^{49}\). Revisions to the Corrective Action Plan(s) are allowed in subsequent Planning Assessments but the planned System shall continue to meet the performance requirements of TPL-001-4 Table 1. Corrective Action Plan(s) do not need to be developed solely to meet the performance requirements for a single sensitivity study analyzed in accordance with TPL-001-4 2.1.4 and 2.4.3\(^{50}\). The Corrective Action Plan(s) is documented in the TEP report. \(^{51}\) The TEP report lists the System deficiencies and the associated actions needed to achieve the required System performance.

Operating Guides may be an acceptable Corrective Action Plan in order to meet the performance requirements if the violation only occurs in the Near-Term Planning Horizon and not in the Long-Term Planning Horizon. Operating guides may include; but not limited to, generation re-dispatch, transmission reconfiguration, Non-Consequential Load Loss, and loss of firm transmission service in accordance with TPL-001-4.

The LG&E and KU Planning Assessment will NOT use Non-Consequential Load Loss when allowed per TPL-001-4 footnote 12 to satisfy the performance requirements of TPL-001-4.

The LG&E and KU BA does not have any automatic generation tripping or run back scheme other than what would be tripped as a result of clearing a fault. If generation is tripped as a result of the fault clearing, then that tripping will be studied as part of the

\(^{49}\) TPL-001-4 2.7

\(^{51}\) TPL-001-4 2.7.1
Contingency analyzed. Automatic generator tripping or automatic generator run-back other than fault clearing should not be considered in the Corrective Action Plan(s).

The LG&E and KU System does have DSM programs, the load forecast supplied by the LSE’s contain reductions in load as a result of the DSM programs. Therefore, DSM programs are not utilized in the Corrective Action Plan(s).

The previous TEP’s Corrective Action Plan(s) are reviewed in subsequent annual Planning Assessments for continued validity and implementation status of identified of Systems Facilities or improvements to existing Systems Facilities.

10.1.1 Corrective Action Plan(s) for P0

The Corrective Action Plans for TPL-001-4 Table 1 Category P0 can include:

- Building new transmission Elements and Facilities
- Upgrading existing transmission Elements and Facilities

10.1.2 Corrective Action Plan(s) for P1 and P3

For events of TPL-001-4 Table 1 Categories P1 and P3 which require a Corrective Action Plan in order to meet the performance requirements of Table 1, the Corrective Action Plans may include:

- Building new transmission Elements and Facilities
- Upgrading existing transmission Elements and Facilities
- Switching procedures
- Transmission re-configuration

10.1.3 Corrective Action Plan(s) P2, P4 through P7

For events of TPL-001-4 Table 1 Categories P2, P4 through P7 which require a Corrective Action Plan in order to meet the performance requirements of Table 1, the Corrective Action Plans may include:

- Building new transmission Elements and Facilities
- Upgrading existing transmission Elements and Facilities
- Switching procedures (see Section 7.4)
- Generation re-dispatch
- Transmission re-configuration

52 TPL-001-4 2.7.4
• Non-Consequential Load Loss where specifically allowed in TPL-001-4 Table 1. However non-consequential load loss allowed per footnote 12 will not be used in the Corrective Action Plan.

10.2 Project Timing

If situations arise that are beyond the control of the Transmission Planner or Planning Coordinator that prevent the implementation of a Corrective Action Plan in the required timeframe, then the Transmission Planner or Planning Coordinator is permitted to utilize Non-Consequential Load Loss and curtailment of Firm Transmission Service to correct the situation that would normally not be permitted in TPL-001-4 Table 1, provided that the Transmission Planner or Planning Coordinator documents that they are taking actions to resolve the situation. The Transmission Planner or Planning Coordinator shall document the situation causing the problem, alternatives evaluated and the use of Non-Consequential Load Loss and curtailment of Firm Transmission Service.

Operating guides are used to document the mitigation steps when a construction project with a need date in the first year of the Planning Horizon (first year of models) is not expected to be completed on time per TPL-001-4 2.7.3. When necessary, an operating guide could include the use of Non-Consequential Load Loss and curtailment of Firm Transmission Service in accordance with TPL-001-4.

The goal of timing projects is to ensure that the project is completed before the loading reaches 100% of the emergency seasonal rating. Due to varying conditions, this may not be possible. Therefore, utilization of TPL-001-4 2.7.3 may be used in the form of an operating guide when studies indicate there is an overload of 100% or more of the seasonal rating.

All existing projects that are not determined to be under construction are reviewed annually to determine if the current timing should be changed.

For P0, P1 and P3 thermal overload of a Facility, the following criteria will be used to determine the needed timing for the Corrective Active Plan to address the issue:

1. The flow on the Facility must be equal to or exceed 100% of the applicable thermal rating of the Facility at the end of the Long-Term Transmission Planning Horizon without the Corrective Action Plan. An issue that does not equal or exceed 100% of the thermal rating of the Facility in the Long-Term Transmission Planning Horizon is not required to have a Corrective Action Plan with one exception. A facility that is overloaded within the Planning Horizon (Near-Term or Long-Term), but not at the end of the Long-Term Planning Horizon is required to have a Corrective Action Plan in the form of a planning level operating guide. This is applicable to Facilities with flows that decrease through time.

53 TPL-001-4 2.7.3
2. Corrective Action Plans for new issues will be timed to the year and season when the flow is equal to or exceeds 98% of the applicable thermal rating of the Facility. The timing of new projects (construction) will not be any earlier than the first model year of the TEP. However, the Corrective Action Plan will contain potential actions, if needed, which can be taken to mitigate the identified constraint in the Planning Horizon prior to the expected completion of construction.

3. Existing Corrective Action Plans that had a timing in the previous TEP will be retimed by the following:
   a. If the flow on the Facility is less than to 96% of the applicable thermal rating for the timing year and season in the previous TEP, the Corrective Action Plan will be retimed to the year and season when the flow is equal to or exceeds 98% of the applicable thermal rating of the Facility.
   b. If the flow on the Facility is equal to or greater than 100% of the applicable thermal rating prior to the timing year and season in the previous TEP, the Corrective Action Plan will be retimed to the year and season when the flow is equal to or exceeds 98% of the applicable thermal rating of the Facility. The timing of new projects (construction) will not be any earlier than the first model year of the TEP. However, the Corrective Action Plan will contain potential actions, if needed, which can be taken to mitigate the identified constraint in the Planning Horizon prior to the expected completion of construction.
   c. If the flow on the Facility is equal to or greater than 96% and less than 100% of the applicable thermal rating for the timing year and season in the previous TEP, the timing of the Corrective Action Plan will remain the same as the previous TEP. Facilities that do not exceed the applicable thermal rating in the Long-Term Planning Horizon will have their Corrective Action Plan delayed beyond the Long-Term Planning Horizon.

Voltage performance driven projects will be timed with a need date based on the performance criteria of section 8. There will not be a timing date associated with these projects.

Until January 1, 2021, Corrective Action Plans applying to the following Categories of Contingencies and events identified in the TPL-001-4, Table 1 are allowed to include Non-Consequential Load Loss and curtailment of Firm Transmission Service (in accordance with Requirement R2, Part 2.7.3) that would not otherwise be permitted by the requirement of TPL-001-4:

- P1-2 (for controlled interruption of electric supply to local network customers connected to or supplied by the Faulted element)
- P1-3 (for controlled interruption of electric supply to local network customers connected to or supplied by the Faulted element)
- P2-1
- P2-2 (above 300 kV)
- P2-3 (above 300 kV)
11 Responsibility Coordination TPL-001-4 R7

Each PC, in conjunction with the TP, shall determine and identify each entity’s individual and joint responsibilities for performing the required studies for the Planning Assessment. LG&E and KU is registered as a PC and TP. LG&E and KU is not a member of a Reliability Transmission Organization (RTO). The LG&E and KU Planning Coordinator area consists only of the LG&E and KU Transmission Owned Facilities. All responsibilities for the studies required by TPL-001-4 and the Planning Assessment are the sole responsibility of the LG&E and KU Transmission Planning group.

The required studies are performed in two parts. Part 1, the TEP uses the study results for planning events (TPL-001-4 Table 1 P0 through P7) and corresponding Corrective Action Plan(s) to demonstrate compliance with TPL-001-4 planning events. The annual planning assessment TEP may utilize a qualified past study when allowed by TPL-001-4 and requirements of TPL-001-4 2.6, are met.

Part 2 is the extreme event report which documents the results of the study for extreme events of TPL-001-4 Table 1. The extreme event report may not be performed annually, and may use a qualified past study as long as the past study for the extreme event analysis is less than five years old and there have been no material changes since the previous past study as discussed in Section 7.5.
Q.1-89. Please provide the most recent Integrated Resource Plan ("IRP") of LGE and KU.

A.1-89. See the response to AG 1-296.
Q.1-90. With regard to Mr. Seelye’s testimony at 2:6, please explain how an increase in system load (KU +LGE) during an off-peak period in April or October contributes to the need for generation resources.

A.1-90. An increase in system load during the off-peak period in April or October would not contribute to the need for additional generation resources. Using the LOLP methodology, no production fixed costs would be allocated on the basis of off-peak loads during April and October. However, under the BIP methodology, off-peak loads during April and October would affect the allocation of fixed production costs, particularly base production costs which are allocated based on annual kWh.
Question No. 91

Responding Witness: William S. Seelye

Q.1-91. With regard to Mr. Seelye’s testimony beginning at 7:1, please provide a complete set of workpapers, including excel spreadsheets with all formulas intact that support the allocation of the revenue increase shown in Table 1.

A.1-91. See Schedule M-2.3-E of Section 16(8)(m) of the Filing Requirements and the response to PSC 1-53.
Q.1-92. With regard to Schedule M-2.3-E, pages 8-10, please provide a proof of revenue/rate design for Rates RTS, TOD-Primary and TOD-Secondary, that reflect the current 75% demand ratchet.

A.1-92. See Schedule M-2.3-E of Section 16(8)(m) of the Filing Requirements. The billing determinants in this filing are based on forecasted operating results. For the billing determinants for Rates RTS, TODP, and TODS, the current Base Demand Charge is applied to billing demands with the current ratchet and the proposed Base Demand Charge is applied to billing demands with the proposed ratchet.
Q.1-93. With regard to Mr. Seelye’s testimony at 45:9 to 50:7, please provide a calculation of the effective percentage of fixed generation related demand costs that a standby customer that used backup generation for 1 hour during a peak period would pay on Rate RTS and on Rate TOD-P based on the Company’s proposal. For example, if the intermediate and peak demand charges represented 100% of generation demand costs and there is a 50% demand ratchet, the customer would pay for 50% of monthly generation demand costs for 11 months and 100% for 1 month.

A.1-93. See the response to PSC 2-94.
Q.1-94. With regard to Schedule M-2.3-E pages 3-24, please provide the support for the Base Demand (100%) billing determinants for Rates TOD-Secondary, TOD-Primary and RTS. Specifically, provide the support for the values from the Pivot table (TAB “Pvt_Tbl”) in the excel workpaper “Att_LGE_PSC_1-53 ElecScheduleM_Forecasted” that is used to derive the Base Demand (100%) billing determinants.

A.1-94. See attached. The attached PDF contains individual customer demand data for each affected rate category for the September 2015 through August 2016 timeframe.
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Attachment to Response to KIUC-1 Question No. 94
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Q.1-95. With regard to Schedule M-2.3-E pages 3-24, please explain how the total Base Demand charge revenue requirement for Rates TOD-Secondary, TOD-Primary and RTS were each determined.

A.1-95. The Base Demand Charge revenue requirement corresponds to the transmission and distribution demand-related costs from the cost of service. Specifically, Base Demand Charge revenue requirements include the fixed demand cost portions of depreciation expenses, operation and maintenance expenses, return on investment, income taxes less miscellaneous revenues.