

**COMMONWEALTH OF KENTUCKY**  
**BEFORE THE PUBLIC SERVICE COMMISSION**

**In the Matter of:**

**ELECTRONIC APPLICATION OF KENTUCKY )**  
**UTILITIES COMPANY FOR A CERTIFICATE )**  
**OF PUBLIC CONVENIENCE AND NECESSITY )**  
**AND APPROVAL OF AMENDMENT OF ITS )** **CASE NO. 2017-00483**  
**2016 COMPLIANCE PLAN FOR RECOVERY BY )**  
**ENVIRONMENTAL SURCHARGE )**

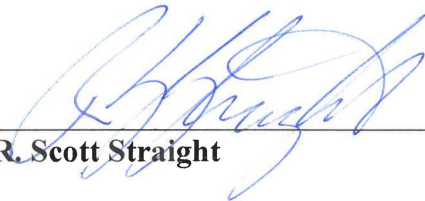
**KENTUCKY UTILITIES COMPANY**  
**RESPONSE TO THE**  
**COMMISSION STAFF'S SECOND REQUEST**  
**FOR INFORMATION**  
**DATED APRIL 6, 2018**

**FILED: APRIL 23, 2018**

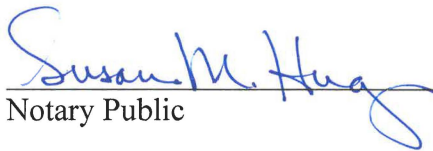
VERIFICATION

COMMONWEALTH OF KENTUCKY )  
 ) SS:  
COUNTY OF JEFFERSON )

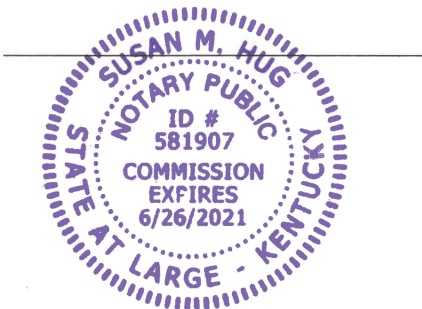
The undersigned, **R. Scott Straight**, being duly sworn, deposes and says that he is Vice President, Project Engineering for Kentucky Utilities Company and Louisville Gas and Electric Company and an employee of LG&E and KU Services Company, and that he has personal knowledge of the matters set forth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

  
\_\_\_\_\_  
**R. Scott Straight**

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 23<sup>rd</sup> day of April 2018.

  
\_\_\_\_\_  
Notary Public (SEAL)

My Commission Expires:



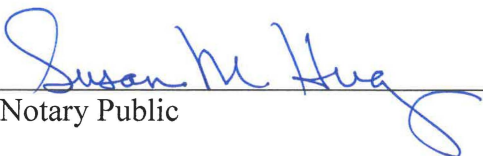
VERIFICATION

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 ) SS:  
COUNTY OF JEFFERSON )

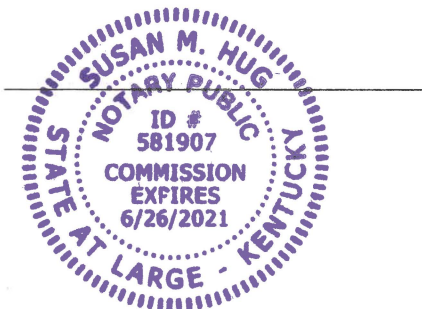
The undersigned, **Stuart A. Wilson**, being duly sworn, deposes and says that he is Director, Energy Planning, Analysis & Forecasting for LG&E and KU Services Company, and that he has personal knowledge of the matters set forth in the responses for which he is identified as the witness, and the answers contained therein are true and correct to the best of his information, knowledge and belief.

  
\_\_\_\_\_  
**Stuart A. Wilson**

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 23<sup>rd</sup> day of April 2018.

  
\_\_\_\_\_  
Notary Public (SEAL)

My Commission Expires:



**KENTUCKY UTILITIES COMPANY**

**Response to Commission Staff's Second Request  
for Information Dated April 6, 2018**

**Case No. 2017-00483**

**Question No. 1**

**Witness: R. Scott Straight**

- Q-1. Identify and describe any changes to Project 42 of KU's 2016 Compliance Plan as a result of the Amended Project 36.
- A-1. In order for the E.W. Brown Station to comply with the CCR Rule while supporting continued operation of Brown Unit 3, engineering and construction of process water treatment systems for Unit 3 and the balance of plant are still required. As discussed at page 8 of Mr. Straight's testimony, the retirement of Brown Units 1 and 2 has allowed KU to scale down or eliminate some equipment associated with the E. W. Brown Station's process water treatment systems. With the unit retirements, the amount of FGD wastewater needing treatment is significantly reduced to less than 60 gallons per minute compared to the original design of 280 gallons per minute.

**KENTUCKY UTILITIES COMPANY**

**Response to Commission Staff's Second Request  
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**Question No. 2**

**Witness: Stuart A. Wilson**

- Q-2. Refer to KU's response to Commission Staff's First Request for Information ("Staff's First Request"), Item 10. Explain how KU will dispose of CCR material at Brown if Phase I's capacity is depleted before Phase II becomes operational in 2019.
- A-2. KU evaluated a range of CCR storage scenarios assuming normal unit operations to assess the timing of the need for additional landfill capacity. Under these expected operating conditions, the likelihood of depleting Phase I's remaining storage capacity before Phase II becomes operational is possible, but remote (less than 3%).

KU closely monitors Brown's CCR storage levels in light of the potential variation in future storage requirements. If concerns arise regarding remaining CCR storage capacity, KU will determine the most reasonable least cost option for conserving storage capacity and reliably serving load. Such possible actions include placing additional CCR in the auxiliary pond to support its closure, shifting generation away from Brown coal units, or seeking further beneficial reuse opportunities.