

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

**In the Matter of:**

**ELECTRONIC EXAMINATION OF THE )  
APPLICATION OF THE FUEL ADJUSTMENT )  
CLAUSE OF LOUISVILLE GAS AND ) CASE NO. 2018-00219  
ELECTRIC COMPANY FROM NOVEMBER 1, )  
2017 THROUGH APRIL 30, 2018 )**

**RESPONSE OF  
LOUISVILLE GAS AND ELECTRIC COMPANY  
TO  
INFORMATION REQUESTED IN  
APPENDIX OF COMMISSION'S ORDER  
DATED AUGUST 10, 2018**

**FILED: AUGUST 24, 2018**

VERIFICATION

COMMONWEALTH OF KENTUCKY )  
 ) SS:  
COUNTY OF JEFFERSON )

The undersigned, **Delbert Billiter**, being duly sworn, deposes and says that he is Manager – LG&E and KU Fuels 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.

  
\_\_\_\_\_  
**Delbert Billiter**

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 24th day of August 2018.

 (SEAL)  
\_\_\_\_\_


Notary Public

My Commission Expires:  
**Judy Schooler**  
**Notary Public, ID No. 603967**  
**State at Large, Kentucky**  
**Commission Expires 7/11/2022**

VERIFICATION

COMMONWEALTH OF KENTUCKY )  
 ) SS:  
COUNTY OF JEFFERSON )

The undersigned, **Michael P. Drake**, being duly sworn, deposes and says that he is Director, Generation Services 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.

  
\_\_\_\_\_  
**Michael P. Drake**

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 21 day of August 2018.

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

My Commission Expires:  
**Judy Schooler**  
**Notary Public, ID No. 603967**  
**State at Large, Kentucky**  
**Commission Expires 7/11/2022**

VERIFICATION

COMMONWEALTH OF KENTUCKY )  
 ) SS:  
COUNTY OF JEFFERSON )

The undersigned, **Derek A. Rahn**, being duly sworn, deposes and says that he is Manager - Revenue Requirement COS 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.

  
Derek A. Rahn

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 24<sup>th</sup> day of August 2018.

 (SEAL)

Notary Public

My Commission Expires:  
**Judy Schooler**  
**Notary Public, ID No. 603967**  
**State at Large, Kentucky**  
**Commission Expires 7/11/2022**

VERIFICATION

COMMONWEALTH OF KENTUCKY )  
 ) SS:  
COUNTY OF JEFFERSON )

The undersigned, **Charles R. Schram**, being duly sworn, deposes and says that he is Director — Power Supply, 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.

  
\_\_\_\_\_  
Charles R. Schram

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 24th day of August 2018.

  
\_\_\_\_\_  
(SEAL)

Notary Public

My Commission Expires:  
**Judy Schooler**  
**Notary Public, ID No. 603967**  
**State at Large, Kentucky**  
**Commission Expires 7/11/2022**

VERIFICATION

COMMONWEALTH OF KENTUCKY )  
 ) SS:  
COUNTY OF JEFFERSON )

The undersigned, **Stuart Wilson**, being duly sworn, deposes and says that he is Director — Energy Planning, Analysis and 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 Wilson**

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 24<sup>th</sup> day of August 2018.

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

My Commission Expires:  
**Judy Schooler**  
**Notary Public, ID No. 603967**  
**State at Large, Kentucky**  
**Commission Expires 7/11/2022**

**LOUISVILLE GAS AND ELECTRIC COMPANY**

**Response to Information Requested in Appendix of  
Commission's Order Dated August 10, 2018**

**Case No. 2018-00219**

**Question No. 1**

**Witness: Delbert Billiter**

Q-1. For the period under review, provide the amount of coal purchased in tons, and the percentage of purchases that were spot versus contract.

A-1. During the review period LG&E purchased 2,983,074 tons.

Spot: 0% (0 tons)

Contract: 100% (2,983,074 tons)

**LOUISVILLE GAS AND ELECTRIC COMPANY**

**Response to Information Requested in Appendix of  
Commission's Order Dated August 10, 2018**

**Case No. 2018-00219**

**Question No. 2**

**Witness: Delbert Billiter**

- Q-2. For the period under review, list each coal purchase made under a long-term contract (one year or greater). For each purchase, list:
- a. Contract or purchase order number;
  - b. The supplier's name;
  - c. The location(s) of production facilities from which the coal is sourced;
  - d. The method of delivery, (i.e., barge, truck, rail, other);
  - e. The actual quantity received during the review period;
  - f. The tonnage requirement for the review period; and
  - g. Current price paid per ton.
- A-2. See attached. Page 1 of the attachment shows only the actual quantity received by LG&E under each contract and page 2 shows the actual combined quantity received by KU and LG&E under each contract. Several contracts were below ratable quantity for the period under review due to flooding in February and March on the Ohio River. However, as of the end of July these deficits were made up, and all contracts are at or above ninety-five percent of ratable.

In addition, Armstrong Energy and its affiliates filed for chapter 11 bankruptcy in the fourth quarter of 2017. Contract J07032B was rejected during the bankruptcy. Therefore, there will be no additional tonnage received under this contract. KU and LG&E were successful in negotiating concessions on the three Armstrong Coal contracts (J14010B, J16017, and J18002) transferred to Western Kentucky Consolidated Energy as part of the bankruptcy.



<b>LG&amp;E Coal Purchases (unloaded) under long-term contract</b>						
<b>November 1, 2017 thru April 30, 2018</b>						
<b>( a )</b>	<b>( b )</b>	<b>( c )</b>	<b>( d )</b>	<b>( e )</b>	<b>( f )</b>	<b>( g )</b>
<b>Contract/PO</b>	<b>Supplier</b>	<b>Location of Production Facility</b>	<b>Delivery Method</b>	<b>Actual Quantity Received</b>	<b>Tonnage Requirement*</b>	<b>Current Price** (\$/ton)</b>
J16001B	Alliance Coal LLC	W-KY	Barge	52,871	85,625	\$48.25
J16008	Alliance Coal LLC	IN, W-KY	Barge	6,706	43,132	\$49.00
J17002	Alliance Coal LLC	W-KY	Barge	527,413	1,000,000	\$42.50
J17005	Alliance Coal LLC	W-KY	Rail	630,282	416,667	\$38.50
J18003	Alliance Coal LLC	W-KY	Barge	123,933	333,333	\$38.00
J18009	Alliance Coal LLC	W-KY	Barge	383,954	639,273	\$36.00
J16012	Arch Coal Sales Company Inc.	WY	Barge		122,366	\$12.60
J07032B	Armstrong Coal Sales	W-KY	Barge, Rail	3,164	-	\$28.50
J14004B	Armstrong Coal Sales	W-KY	Barge, Rail	74,538	86,263	\$44.61-B, \$43.61-R
J14010B	Armstrong Coal Sales	W-KY	Barge	6,388	30,170	\$44.00
J16003	Armstrong Coal Sales	W-KY	Barge, Rail	4,812	172,527	\$39.62
J16017	Armstrong Coal Sales	W-KY	Barge, Rail	245,313	276,823	\$42.11-B, \$41.11-R
J18002	Armstrong Coal Sales	W-KY	Barge, Rail	45,791	168,983	Q1-\$44.64 B/R, Q2-\$41.74 B/R
J17001	Contura Energy	PA	Barge		166,474	\$38.00
J16005	Eagle River Coal LLC	IL	Barge	62,041	211,758	\$50.81
J16018	Foresight Coal Sales LLC	IL	Barge	204,958	666,667	\$40.45-IL, \$39.55-W-KY
J18005	Knight Hawk Coal, LLC	IL	Barge	17,434	166,667	\$34.68
J16007	Peabody COALSALES LLC	IN	Barge	40,871	378,557	\$44.74-B, \$44.67-B, \$41.67-R
J14001	Rhino Energy LLC	W-KY	Barge	92,335	271,355	\$37.00
J15002B	Sunrise Coal	IN	Rail		83,333	\$37.62
J16006	The American Coal Company	IL, WV, W-KY	Barge	83,316	383,333	\$39.60-IL, \$38.60-WV, \$38.70-W-KY
J17004	The American Coal Company	IL, WV, W-KY	Barge		250,000	\$34.20-IL, \$33.20-WV, \$33.30-W-KY
J18004	Western Ky Minerals, Inc	W-KY	Barge	24,094	67,750	\$38.00
J14010C	Western Ky Consolidated Resources, LLC	W-KY	Barge	4,840	20,718	\$42.00
J16017B	Western Ky Consolidated Resources, LLC	W-KY	Barge, Rail	151,604	70,362	\$39.50
J18002B	Western Ky Consolidated Resources, LLC	W-KY	Barge, Rail	196,416	257,400	\$41.78
				2,983,074		
*Tonnage Requirement is a ratable volume for combined LG&E and KU coal station shipments						
**Prices vary by source/transportation type						
						<b>Attachment to Response to Question No. 2</b>
						<b>BILLITER</b>
						<b>Page 1 of 2</b>

<b>Combined LG&amp;E and KU Coal Purchases (unloaded) under long-term contract</b>						
<b>November 1, 2017 thru April 30, 2018</b>						
<b>( a )</b>	<b>( b )</b>	<b>( c )</b>	<b>( d )</b>	<b>( e )</b>	<b>( f )</b>	<b>( g )</b>
<b>Contract/PO</b>	<b>Supplier</b>	<b>Location of Production Facility</b>	<b>Delivery Method</b>	<b>Actual Quantity Received</b>	<b>Tonnage Requirement*</b>	<b>Current Price** (\$/ton)</b>
J16001B	Alliance Coal LLC	W-KY	Barge	87,892	85,625	\$48.25
J16008	Alliance Coal LLC	IN, W-KY	Barge	31,726	43,132	\$49.00
J17002	Alliance Coal LLC	W-KY	Barge	897,060	1,000,000	\$42.50
J17005	Alliance Coal LLC	W-KY	Rail	630,282	416,667	\$38.50
J18003	Alliance Coal LLC	W-KY	Barge	317,864	333,333	\$38.00
J18009	Alliance Coal LLC	W-KY	Barge	613,330	639,273	\$36.00
J16012	Arch Coal Sales Company Inc.	WY	Barge	227,334	122,366	\$12.60
J07032B	Armstrong Coal Sales	W-KY	Barge, Rail	15,894	-	\$28.50
J14004B	Armstrong Coal Sales	W-KY	Barge, Rail	74,538	86,263	\$44.61-B, \$43.61-R
J14010B	Armstrong Coal Sales	W-KY	Barge	25,568	30,170	\$44.00
J16003	Armstrong Coal Sales	W-KY	Barge, Rail	145,052	172,527	\$39.62
J16017	Armstrong Coal Sales	W-KY	Barge, Rail	259,557	276,823	\$42.11-B, \$41.11-R
J18002	Armstrong Coal Sales	W-KY	Barge, Rail	168,983	168,983	Q1-\$44.64 B/R, Q2-\$41.74 B/R
J17001	Contura Energy	PA	Barge	79,599	166,474	\$38.00
J16005	Eagle River Coal LLC	IL	Barge	218,588	211,758	\$50.81
J16018	Foresight Coal Sales LLC	IL, W-KY	Barge	447,798	666,667	\$40.45-IL, \$39.55-W-KY
J18005	Knight Hawk Coal, LLC	IL	Barge	140,541	166,667	\$34.68
J16007	Peabody COALSLES LLC	IN	Barge, Rail	353,038	378,557	\$44.74-B, \$44.67-B, \$41.67-R
J14001	Rhino Energy LLC	W-KY	Barge	262,016	271,355	\$37.00
J15002B	Sunrise Coal	IN	Rail	96,919	83,333	\$37.62
J16006	The American Coal Company	IL, WV, W-KY	Barge	357,630	383,333	\$39.60-IL, \$38.60-WV, \$38.70-W-KY
J17004	The American Coal Company	IL, WV, W-KY	Barge	151,794	250,000	\$34.20-IL, \$33.20-WV, \$33.30-W-KY
J18004	Western Ky Minerals, Inc	W-KY	Barge	45,026	67,750	\$38.00
J14010C	Western Ky Consolidated Resources, LLC	W-KY	Barge	22,436	20,718	\$42.00
J16017B	Western Ky Consolidated Resources, LLC	W-KY	Barge	156,368	70,362	\$39.50
J18002B	Western Ky Consolidated Resources, LLC	W-KY	Barge	290,792	257,400	\$41.78
				6,117,623	6,369,536	
*Tonnage Requirement is a ratable volume for combined LG&E and KU coal station shipments						
**Prices vary by source/transportation type						

LOUISVILLE GAS AND ELECTRIC COMPANY

Response to Information Requested in Appendix of  
Commission's Order Dated August 10, 2018

Case No. 2018-00219

Question No. 3

Witness: Delbert Billiter

- Q-3. a. As of the last day of the review period, state the coal inventory level in tons, and in number of days' supply. Provide this information by generating station and in the aggregate.
- b. Describe the criteria used to determine number of days' supply.
- c. State the target coal inventory level for each generating station, and for the total system.
- d. If actual coal inventory exceeds the target inventory by ten days' supply, state the reasons for the excess inventory.
- e. (1) State whether any significant changes in the current coal inventory target are expected within the next 12 months.
- (2) If so, state the expected change, and the reasons for this change.

- A-3. a. As of April 30, 2018:

Mill Creek	600,773 Tons; 41 Days	Target 20-41 Days
Trimble County <sup>1</sup>	281,118 Tons; 51 Days	Target 21-43 Days
<b>Total</b>	<b>881,891 Tons; 42 Days</b>	<b>Target 19-39 Days</b>

<sup>1</sup>Trimble County coal inventory includes LG&E's allocated ownership of both high sulfur coal, which is used in Unit 1 and Unit 2, and PRB coal, which is used only in Unit 2. The days in inventory and target range are calculated on a combined basis regardless of ownership.

- b. The method of calculating days in inventory is based on each plant's coal burn capability (coal tons in inventory divided by 90% of each generating unit's heat input description from its air permit to operate).

Upper and lower days of inventory targets were established for each plant taking into consideration the plant's operating parameters. Each plant's "least cost" inventory

range is established annually during the planning process taking into account the risk of coal delivery disruptions, potential coal burn volatility, procurement reaction time for short term coal supply, cost of unserved energy, and current coal and electricity prices.

- c. See (a) above.
- d. Not applicable.
- e. (1) LG&E does not expect significant changes to its current coal inventory target levels; however, during the Companies' planning cycle minor adjustments may be made to the inventory targets if warranted.  
  
(2) Not applicable.

**LOUISVILLE GAS AND ELECTRIC COMPANY**

**Response to Information Requested in Appendix of  
Commission's Order Dated August 10, 2018**

**Case No. 2018-00219**

**Question No. 4**

**Witness: Delbert Billiter**

- Q-4. List each written coal-supply solicitation issued during the period under review.
- a. For each solicitation, provide the date of the solicitation, the type of solicitation (contract or spot), the quantities solicited, a general description of the quality of coal solicited, the time period over which deliveries were requested, and the generating unit(s) for which the coal was intended.
  - b. For each solicitation, state the number of vendors to whom the solicitation was sent, the number of vendors who responded, and the selected vendor. Provide the bid tabulation sheet or corresponding document that ranked the proposals. (This document should identify all vendors who made offers.) State the reasons for each selection. For each lowest-cost bid not selected, explain why the bid was not selected.

A-4. a. **SOLICITATION 1**

Date: February 14, 2018  
Contract/Spot: Contract or Spot  
Quantities: No minimum or maximum specified  
Quality: Suitable for KU's Ghent and E.W. Brown Stations and LG&E's  
Trimble County and Mill Creek Stations  
Period: April 1, 2018 through December 31, 2018 – Spot  
2019 and beyond - Contract  
Generating Units: KU's Ghent and E.W. Brown Stations and LG&E's Trimble County  
and Mill Creek Stations

- b. Number of vendors sent a solicitation: 119  
Number of vendors responded: 17 companies / 30 offers

Selected vendor(s): The vendors selected were based upon the lowest evaluated delivered cost, operational and environmental requirements of the units and other factors impacting coal supply reliability as noted on the bid evaluation sheets attached.

**High Sulfur – Spot**

Alliance Coal, LLC – J18028

Sunrise Coal, LLC – J18025 Amendment 1

**High Sulfur – Contract**

Peabody Coalsales, LLC – J19003

Alliance Coal, LLC – J19001

Western Kentucky Mineral, Inc. – J19004

White Stallion Energy/Eagle River Coal – J19002

The bid analysis information is confidential and proprietary and is being provided under seal pursuant to a petition for confidential protection.

The entire attachment is  
Confidential and  
provided separately  
under seal.

**LOUISVILLE GAS AND ELECTRIC COMPANY**

**Response to Information Requested in Appendix of  
Commission's Order Dated August 10, 2018**

**Case No. 2018-00219**

**Question No. 5**

**Witness: Delbert Billiter**

- Q-5. List each oral coal-supply solicitation issued during the period under review.
- a. For each solicitation, state why the solicitation was not written, the date(s) of the solicitation, the quantities solicited, a general description of the quality of coal solicited, the time period over which deliveries were requested, and the generating unit(s) for which the coal was intended.
  - b. For each solicitation, identify all vendors solicited and the vendor selected. Provide the tabulation sheet or other document that ranks the proposals. (This document should identify all vendors who made offers.) State the reasons for each selection. For each lowest-cost bid not selected, explain why the bid was not selected.
- A-5. There were no oral coal-supply solicitations during the period under review.



**LOUISVILLE GAS AND ELECTRIC COMPANY**

**Response to Information Requested in Appendix of  
Commission's Order Dated August 10, 2018**

**Case No. 2018-00219**

**Question No. 6**

**Witness: Charles R. Schram**

- Q-6. For the period under review, list each vendor from whom natural gas was purchased for generation and the quantities and the nature of each purchase (i.e., spot or contract).
- A-6. See attached for the list of vendors, associated quantities, and the nature of each natural gas purchase.

**Attachment to Response to Question No. 6**  
**Page 1 of 1**  
**Schram**

<u>Vendor</u>	<u>Type</u> <sup>1</sup>	<u>MMBtu</u>
Anadarko Energy Services Company	Spot	98,958
BP Energy Company	Spot	1,393,126
Castleton Commodities Merchant Trading L.P.	Spot	1,000
CenterPoint Energy Service, Inc.	Spot	43,000
Cima Energy , LP	Spot	604,800
Colonial Energy, Inc.	Spot	263,514
ConocoPhillips Company	Spot	113,266
Direct Energy Business Marketing, LLC	Spot	179,300
DTE Energy Trading, Inc.	Spot	82,100
Eco-Energy, LLC	Spot	379,758
EDF Trading North America, LLC	Spot	26,900
Exelon Generation Company, LLC	Spot	547,746
J. Aron & Company LLC	Spot	20,200
Kaiser Marketing Appalachian, LLC	Spot	100,854
Macquarie Energy, LLC	Spot	791,996
Mercuria Energy America, Inc.	Spot	53,000
NextEra Energy Marketing, LLC	Spot	2,139,137
NJR Energy Services Company	Spot	224,590
Range Resources - Appalachia, LLC	Spot	574,121
Sequent Energy Management, L.P.	Spot	1,022,000
Shell Energy North America (US), L.P.	Spot	1,794,517
Spire Marketing Inc.	Spot	1,540,100
SWN Energy Services Company, LLC	Spot	260,663
Tenaska Marketing Ventures	Spot	7,679,000
Tennessee Valley Authority	Spot	20,000
Twin Eagle Resource Management, LLC	Spot	283,397
Uniper Global Commodities North America LLC	Spot	656,453
United Energy Trading, LLC	Spot	88,900
Wells Fargo Commodities, LLC	Spot	402,997
Columbia Gas of Kentucky, Inc.	GSO Customer <sup>2</sup>	127
LGE-GAS SUPPLY	Special Contract <sup>3</sup>	137,716
DTE Energy Trading, Inc.	Forward	300,000
Macquarie Energy, LLC	Forward	609,908
Mercuria Energy America, Inc.	Forward	894,740
Tenaska Marketing Ventures	Forward	2,110,000
Uniper Global Commodities North America LLC	Forward	899,050
Wells Fargo Commodities, LLC	Forward	1,804,826
	Total Volume	28,141,760

<sup>1</sup> Spot refers to gas purchases delivered during the next gas day following the transaction. Friday transactions include Sat, Sun, & Mon (holiday weekends can cover four days). Forward refers to gas purchased for delivery periods typically starting after the current month.

<sup>2</sup> KU is a General Sales Other (GSO) customer of Columbia Gas of Kentucky for the Haefling Plant; no volume purchase commitments.

<sup>3</sup> LG&E is the local gas distribution company; no volume purchase commitments.

**LOUISVILLE GAS AND ELECTRIC COMPANY**

**Response to Information Requested in Appendix of  
Commission's Order Dated August 10, 2018**

**Case No. 2018-00219**

**Question No. 7**

**Witness: Charles R. Schram**

- Q-7. For the period under review, state if there were any instances in which a natural gas generating unit could not be operated when it otherwise would have run, due to pipeline constraints or natural gas being unavailable.
- A-7. There were no instances of generating unit restrictions due to pipeline constraints or natural gas unavailability.

**LOUISVILLE GAS AND ELECTRIC COMPANY**

**Response to Information Requested in Appendix of  
Commission's Order Dated August 10, 2018**

**Case No. 2018-00219**

**Question No. 8**

**Witness: Delbert Billiter / Charles R. Schram**

- Q-8. State if there have been any changes to hedging activities for coal or natural gas purchases used for generation since the previous FAC review proceeding. If so, describe the changes in detail.
- A-8. There have been no changes to the physical hedging practices or guidelines since the previous review proceeding. LG&E does not engage in financial hedging activities for its coal or natural gas purchases.

**LOUISVILLE GAS AND ELECTRIC COMPANY**

**Response to Information Requested in Appendix of  
Commission's Order Dated August 10, 2018**

**Case No. 2018-00219**

**Question No. 9**

**Witness: Delbert Billiter / Charles R. Schram**

- Q-9. a. State whether LG&E has audited any of its fuel or transportation contracts during the period under review.
- b. If so, for each audited contract:
- (1) Identify the contract;
  - (2) Identify the auditor and
  - (3) State the results of the audit and describe the actions that LG&E took as a result of the audit.
- A-9. a. No. LG&E has not conducted any financial audits of its fuel or transportation contracts.
- LG&E's Manager Fuels Technical Services or LG&E's Mining Engineer conducts scheduled on-site reviews and inspections of the mining operations, scales and sampling systems of each vendor up to twice a year, and likewise may conduct unscheduled visits. Additionally, LG&E employees may visit a vendor as needed to address problems and issues at any time.
- b. Not applicable.

**LOUISVILLE GAS AND ELECTRIC COMPANY**

**Response to Information Requested in Appendix of  
Commission's Order Dated August 10, 2018**

**Case No. 2018-00219**

**Question No. 10**

**Witness: Delbert Billiter / Charles R. Schram**

- Q-10. a. State whether LG&E is currently involved in any litigation with its current or former fuel suppliers or transportation vendors.
- b. If yes, for each litigation:
- (1) Identity the supplier or vendor;
  - (2) Identity the contract involved;
  - (3) State the potential liability or recovery to LG&E;
  - (4) List the issues presented; and
  - (5) Provide a copy of the complaint or other legal pleading that initiated the litigation and any answers or counterclaims. If a copy has previously been filed with the Commission, provide the date on which it was filed and the case in which it was filed.
- c. State the current status of all litigation with suppliers or vendors.
- A-10. a. LG&E is not currently involved in any litigation with its fuel suppliers or transportation vendors.
- b. Not applicable.
- c. Not applicable.

**LOUISVILLE GAS AND ELECTRIC COMPANY**

**Response to Information Requested in Appendix of  
Commission's Order Dated August 10, 2018**

**Case No. 2018-00219**

**Question No. 11**

**Witness: Delbert Billiter / Charles R. Schram**

- Q-11. a. For the period under review, state if there have been any changes to LG&E's written policies and procedures regarding its fuel procurement.
- b. If yes:
- (1) Describe the changes;
  - (2) Provide the written policies and procedures as changed;
  - (3) State the date(s) the changes were made; and
  - (4) Explain why the changes were made.
- c. If no, provide the date LG&E's current fuel procurement policies and procedures were last changed, when they were last provided to the Commission, and identify the proceeding in which they were provided.
- A-11. a-c. During the period under review, there were no changes to The Corporate Fuels and By-Products Procurement Procedures for coal. The Corporate Fuels and By-Products Procurement Procedures were last updated April 1, 2017 and were provided to the Commission in Case No. 2017-00285 in response to Question No. 15.

During the period under review, there were no changes to the Power Supply Commodity Policy – Natural Gas Fuel for Generation. The Power Supply Commodity Policy – Natural Gas Fuel for Generation was last updated August 1, 2017 and was provided to the Commission in Case No. 2018-00021 in response to Question No. 11.

**LOUISVILLE GAS AND ELECTRIC COMPANY**

**Response to Information Requested in Appendix of  
Commission's Order Dated August 10, 2018**

**Case No. 2018-00219**

**Question No. 12**

**Witness: Stuart Wilson**

Q-12. For the period under review, list all firm power commitments for (a) purchases and (b) sales. This list shall identify the electric utility, the amount of commitment in MW, and the purpose of the commitment (i.e., peaking, emergency).

A-12. a. Firm Purchases

The firm purchases from Ohio Valley Electric Corporation (OVEC) for the review period are shown in the table below. LG&E purchased its participation ratio (5.63%) of the OVEC released capacity for the months in question:

<u>Utility</u>	<u>Companies' Amt (MW)</u>	<u>LG&amp;E Portion (MW)</u>	<u>Purpose</u>
OVEC (Nov 2017)	~ 132	~ 91	Baseload
OVEC (Dec 2017)	~ 158	~ 109	Baseload
OVEC (Jan 2018)	~ 158	~ 109	Baseload
OVEC (Feb 2018)	~ 158	~ 109	Baseload
OVEC (Mar 2018)	~ 158	~ 109	Baseload
OVEC (Apr 2018)	~ 122	~ 84	Baseload

In addition, LG&E has a capacity purchase and tolling agreement with Bluegrass Generation through April 2019 for 165 MW of peaking capacity from a simple cycle combustion turbine.

b. Sales – NONE



**LOUISVILLE GAS AND ELECTRIC COMPANY**

**Response to Information Requested in Appendix of  
Commission's Order Dated August 10, 2018**

**Case No. 2018-00219**

**Question No. 13**

**Witness: Derek Rahn**

Q-13. Provide a monthly billing summary of sales to all electric utilities for the period under review.

A-13. See Page 2, Sheet 1 of 3 of the November 2017 through April 2018 monthly Form B filings that were previously filed with the Commission.

**LOUISVILLE GAS AND ELECTRIC COMPANY**

**Response to Information Requested in Appendix of  
Commission's Order Dated August 10, 2018**

**Case No. 2018-00219**

**Question No. 14**

**Witness: Derek Rahn**

Q-14. Describe the effect on the FAC calculation of line losses related to:

- a. intersystem sales when using a third-party transmission system, and
- b. intersystem sales when not using a third-party transmission system.

A-14. a-b. Line losses related to inter-system sales are calculated using a loss factor of 0.5% whether the inter-system sale requires a third party transmission system or not. This practice is consistent with the Commission's June 7, 2013, Amended Order in Case No. 2012-00553.

**LOUISVILLE GAS AND ELECTRIC COMPANY**

**Response to Information Requested in Appendix of  
Commission's Order Dated August 10, 2018**

**Case No. 2018-00219**

**Question No. 15**

**Witness: Michael P. Drake**

Q-15. Provide a list, in chronological order, showing by unit, any scheduled, actual, and forced outages for the period under review.

A-15. See attached.

Louisville Gas & Electric Company  
November 2017 through April 2018

Unit and Outage Type (F=Forced; S=Scheduled)	Scheduled		Actual*		HOURS OF DURATION		REASON FOR DEVIATION FROM SCHEDULED MAINTENANCE OR REASON FOR FORCED OUTAGE AS APPROPRIATE	
	FROM	TO	FROM	TO	Scheduled	Actual*		
Mill Creek Unit 1 - Coal - 300 MW	S	11/23/2017 1:27	11/26/2017 7:34	11/23/2017 1:27	11/26/2017 7:34	78:07	78:07	Air heater wash
In-service August 1972	S	11/28/2017 11:36	11/29/2017 8:12	11/28/2017 11:36	11/29/2017 8:12	20:36	20:36	Boiler waterwall tube leak
	S	3/10/2018 0:00	3/25/2018 0:00	3/9/2018 21:38	3/26/2018 0:00	360:00	386:22	Boiler inspection
	S	3/26/2018 0:00	3/26/2018 10:51	3/26/2018 0:00	3/26/2018 10:51	10:51	10:51	Boiler inspection planned extension
Mill Creek Unit 2 - Coal - 295 MW	F			2/19/2018 10:23	2/20/2018 15:03		28:40	Power transformer protective trip
In-service July 1974	S	3/10/2018 0:00	5/6/2018 0:00	3/9/2018 22:37	5/7/2018 0:00	1368:00	1393:23	Major turbine overhaul
Mill Creek Unit 3 - Coal - 394 MW	F			11/25/2017 2:32	11/25/2017 16:52		14:20	Coal conveyor repairs
In-service August 1978	S	2/5/2018 22:36	2/6/2018 21:23	2/5/2018 22:36	2/6/2018 21:23	22:47	22:47	Condenser tube leak
	F			2/19/2018 22:37	2/22/2018 9:16		58:39	Boiler secondary superheater tube leak
	S	3/30/2018 0:00	4/29/2018 0:00	3/30/2018 21:59	4/30/2018 0:00	720:00	722:01	Minor boiler outage
	S	4/30/2018 0:00	5/2/2018 7:40	4/30/2018 0:00	5/2/2018 7:40	55:40	55:40	Minor boiler outage planned extension
Mill Creek Unit 4 - Coal - 486 MW	S	10/28/2017 0:00	11/26/2017 0:00	10/27/2017 23:31	11/26/2017 0:00	696:00	696:29	Air heater baskets replacement
In-service September 1982	S	11/26/2017 0:00	11/29/2017 4:13	11/26/2017 0:00	11/29/2017 4:13	76:13	76:13	Air heater baskets replacement planned extension
	F			11/29/2017 4:47	11/30/2017 13:16		32:29	Blowdown tank and Stop valve drain steam leaks
	S	1/20/2018 2:08	1/23/2018 0:00	1/20/2018 2:08	1/23/2018 0:00	69:52	69:52	Air heater wash
	S	2/8/2018 23:16	2/11/2018 17:02	2/8/2018 23:16	2/11/2018 17:02	65:46	65:46	Water coil air heater cleaning
	S	3/2/2018 23:35	3/6/2018 0:00	3/2/2018 23:35	3/6/2018 0:00	72:25	72:25	Air heater wash
	S	3/6/2018 0:00	3/7/2018 2:33	3/6/2018 0:00	3/7/2018 2:33	26:33	26:33	Air heater wash
Trimble County Unit 1 - Coal - 370 MW	S	9/23/2017 0:00	11/26/2017 0:00	9/24/2017 1:45	11/25/2017 2:05	1536:00	1488:20	Major turbine overhaul
In-service December 1990	S			11/25/2017 2:05	11/25/2017 23:48		21:43	Turbine vibration
75% ownership share of 511 MW	S	11/26/2017 4:20	11/26/2017 14:27	11/26/2017 4:20	11/26/2017 14:27	10:07	10:07	Turbine vibration
	F			11/28/2017 21:06	11/30/2017 7:47		34:41	Turbine vibration balance correction
	F			11/30/2017 18:04	12/2/2017 22:23		52:19	Turbine main steam screens fouling
	F			12/2/2017 22:23	12/3/2017 19:57		21:34	Blowdown tank leak repair

\*Actual outages dates and hours of duration include scheduled and forced outages.

Louisville Gas & Electric Company  
November 2017 through April 2018

Unit and Outage Type (F=Forced; S=Scheduled)	Scheduled		Actual*		HOURS OF DURATION		REASON FOR DEVIATION FROM SCHEDULED MAINTENANCE OR REASON FOR FORCED OUTAGE AS APPROPRIATE	
	FROM	TO	FROM	TO	Scheduled	Actual*		
	S	1/20/2018 1:21	1/22/2018 12:31	1/20/2018 1:21	1/22/2018 12:31	59:10	59:10	Turbine vibration balance correction
	F			1/31/2018 22:03	2/1/2018 5:08		7:05	Turbine differential expansion limit
	S	2/3/2018 12:10	2/3/2018 21:56	2/3/2018 12:10	2/3/2018 21:56	9:46	9:46	Stator cooling line repair
	S	2/16/2018 0:59	2/19/2018 2:36	2/16/2018 0:59	2/19/2018 2:36	73:37	73:37	Turbine vibration balance correction
	F			3/7/2018 3:01	3/7/2018 15:03		12:02	Furnace pressure trip
<b>Trimble County Unit 2 - Coal - 570 MW</b>	F			12/10/2017 0:17	12/13/2017 14:00		85:43	Boiler waterwall tube leak
<b>In-service January 2011</b>	S	12/20/2017 6:34	12/22/2017 11:54	12/20/2017 6:34	12/22/2017 11:54	53:20	53:20	Boiler waterwall tube leak
<b>75% ownership share of 732 MW jointly owned with KU</b>	F			1/1/2018 0:00	1/1/2018 11:56		11:56	Boiler waterwall tube leak
	F			12/29/2017 19:31	1/1/2018 0:00		52:29	Boiler waterwall tube leak extension
	S	2/24/2018 0:00	4/22/2018 0:00	2/23/2018 23:30	4/30/2018 0:00	1368:00	1560:30	Major turbine overhaul
	S	4/30/2018 0:00	5/12/2018 23:11	4/30/2018 0:00	5/12/2018 23:11	311:11	311:11	Major turbine overhaul extension
<b>Cane Run Unit 7 - Gas CC - 683 MW</b>	S	10/30/2017 0:00	11/17/2017 12:44	10/30/2017 0:00	11/17/2017 12:44	444:44	444:44	Repair Steam turbine after inspection
<b>In-service June 2015</b>	F			2/24/2018 13:15	2/25/2018 1:50		12:35	Gas valve Instrumentation repair
<b>Jointly owned with KU</b>								
<b>E. W. Brown Unit 5 - Gas CT - 130 MW</b>	S	9/23/2017 0:00	11/19/2017 0:00	9/22/2017 9:56	11/14/2017 17:50	1368:00	1279:54	Major overhaul
<b>In-service June 2001</b>	S			11/14/2017 18:25	11/15/2017 8:26		14:01	Major overhaul extension
<b>Jointly owned with KU</b>	F			11/27/2017 5:37	11/27/2017 13:40		8:03	Gas line pressure instability
	F			12/26/2017 4:55	12/26/2017 11:11		6:16	Oil vapor extractor repair
	F			12/27/2017 4:01	12/27/2017 10:40		6:39	Cooling water system inspection
	F			3/4/2018 20:44	3/23/2018 12:53		448:09	Turbine control system repair
<b>E. W. Brown Unit 6 - Gas CT - 171 MW</b>	F			11/20/2017 5:27	11/21/2017 9:34		28:07	Startup System fault
<b>In-service August 1999</b>	S	11/30/2017 9:11	11/30/2017 17:38	11/30/2017 9:11	11/30/2017 17:38	8:27	8:27	Main transformer - testing
<b>Jointly owned with KU</b>	F			12/26/2017 4:50	12/28/2017 17:31		60:41	Ignition system repair
	F			1/2/2018 19:24	1/3/2018 10:17		14:53	Turbine control system repair
	F			1/12/2018 15:07	1/14/2018 13:16		46:09	Ignition system inspection

Attachment to Response to Question No. 15

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Drake

\*Actual outages dates and hours of duration include scheduled and forced outages.

Louisville Gas & Electric Company  
November 2017 through April 2018

Unit and Outage Type (F=Forced; S=Scheduled)	Scheduled		Actual*		HOURS OF DURATION		REASON FOR DEVIATION FROM SCHEDULED MAINTENANCE OR REASON FOR FORCED OUTAGE AS APPROPRIATE	
	FROM	TO	FROM	TO	Scheduled	Actual*		
	S	1/19/2018 11:14	1/24/2018 19:47	1/19/2018 11:14	1/24/2018 19:47	128:33	128:33	Ignition system - Ignitor repair
	F			2/2/2018 6:43	2/2/2018 16:18		9:35	Cooling water system repair
	F			2/8/2018 6:15	2/8/2018 14:39		8:24	Ignition system failure to start
	S	2/21/2018 6:54	2/22/2018 0:00	2/21/2018 6:54	2/22/2018 0:00	17:06	17:06	Turbine Lube Oil System
	S	3/3/2018 0:00	3/11/2018 0:00	3/2/2018 8:04	3/6/2018 15:49	192:00	103:45	Generator and gas path inspection
	F			4/23/2018 5:26	4/23/2018 15:00		9:34	Ignition system failure to start
<b>E. W. Brown Unit 7 - Gas CT - 171 MW</b>	S	11/29/2017 7:48	11/29/2017 13:58	11/29/2017 7:48	11/29/2017 13:58	6:10	6:10	Annual calibration of gas flow meter
<b>In-service August 1999</b>	F			12/26/2017 4:50	12/26/2017 11:11		6:21	Starting system - excitation trip
<b>Jointly owned with KU</b>	F			12/27/2017 3:54	12/29/2017 18:29		62:35	Control system
	S	3/3/2018 0:00	3/11/2018 0:00	3/6/2018 16:27	3/9/2018 11:00	192:00	66:33	Borescope inspection
<b>Cane Run Unit 11 - Gas CT - 14 MW</b>	S	12/7/2017 6:34	12/8/2017 0:05	12/7/2017 6:34	12/8/2017 0:05	17:31	17:31	Substation maintenance
<b>In-service June 1968</b>	S	3/6/2018 7:13	3/6/2018 13:25	3/6/2018 7:13	3/6/2018 13:25	6:12	6:12	Starting diesel annual maintenance
<b>Paddys Run Unit 11 - Gas CT - 13 MW</b>	F			11/16/2017 8:35	11/25/2017 11:15		218:40	Starting system repair
<b>In-service June 1968</b>	F			4/25/2018 7:24	5/15/2018 12:50		485:26	Starting system repair
<b>Paddys Run Unit 12 - Gas CT - 28 MW</b>	F			1/24/2018 22:26	1/25/2018 8:31		10:05	Fire protection system repair
<b>In-service July 1968</b>	S	3/7/2018 7:35	3/7/2018 14:16	3/7/2018 7:35	3/7/2018 14:16	6:41	6:41	Starting diesel annual maintenance
<b>Paddys Run Unit 13 - Gas CT - 175 MW</b>	S	11/25/2017 0:00	12/3/2017 0:00	11/25/2017 7:00	12/2/2017 17:08	192:00	178:08	Gas Turbine Inspection
<b>In-service June 2001</b>	S	12/2/2017 22:34	12/5/2017 18:17	12/2/2017 22:34	12/5/2017 18:17	67:43	67:43	Gas turbine inlet filter replacement
<b>Jointly owned with KU</b>								
<b>Trimble County Unit 5 - Gas CT - 179 MW</b>	F			1/4/2018 6:33	1/4/2018 17:07		10:34	Breaker operation failure
<b>In-service May 2002</b>	S	2/6/2018 6:41	2/6/2018 14:21	2/6/2018 6:41	2/6/2018 14:21	7:40	7:40	Fire protection system maintenance
<b>Jointly owned with KU</b>	S	3/24/2018 0:00	4/1/2018 0:00	3/23/2018 10:59	4/1/2018 17:18	192:00	222:19	Startup gas valve replacement
<b>Trimble County Unit 6 - Gas CT - 179 MW</b>	S	11/16/2017 10:00	11/16/2017 21:15	11/16/2017 10:00	11/16/2017 21:15	11:15	11:15	Lube oil pump replacement
<b>In-service May 2002</b>	F			1/3/2018 9:22	1/4/2018 20:29		35:07	Breaker operation failure
<b>Jointly owned with KU</b>	S	3/24/2018 0:00	4/1/2018 0:00	3/23/2018 10:59	3/29/2018 10:43	192:00	143:44	Startup gas valve replacement

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\*Actual outages dates and hours of duration include scheduled and forced outages.

Louisville Gas & Electric Company  
November 2017 through April 2018

Unit and Outage Type (F=Forced; S=Scheduled)	Scheduled		Actual*		HOURS OF DURATION		REASON FOR DEVIATION FROM SCHEDULED MAINTENANCE OR REASON FOR FORCED OUTAGE AS APPROPRIATE
	FROM	TO	FROM	TO	Scheduled	Actual*	
Trimble County Unit 7 - Gas CT - 179 MW In-service June 2004 Jointly owned with KU	F		1/1/2018 3:27	1/1/2018 12:45		9:18	Starting system - static start switch repair
Trimble County Unit 8 - Gas CT - 179 MW In-service June 2004 Jointly owned with KU	F		12/30/2017 16:38	12/31/2017 6:14		13:36	Starting system - static start switch repair
Trimble County Unit 9 - Gas CT - 179 MW In-service July 2004 Jointly owned with KU	S	11/18/2017 0:00 11/26/2017 0:00	12/8/2017 8:11	12/10/2017 14:16	192:00	54:05	Hydraulic oil system maintenance
Trimble County Unit 10 - Gas CT - 179 MW In-service July 2004 Jointly owned with KU	S	11/18/2017 0:00 11/26/2017 0:00	12/8/2017 11:03	12/10/2017 11:41	192:00	48:38	Hydraulic oil system maintenance
Zorn Unit 1 - Gas CT - 16 MW In-service May 1969	S	10/9/2017 20:00 11/7/2017 8:45	10/9/2017 20:00	11/7/2017 8:45	684:45	684:45	Gas line repair
	F		1/17/2018 16:49	1/23/2018 15:33		142:44	Gas line repair
	F		2/14/2018 10:50	3/9/2018 13:27		554:37	Lube oil system repair
	F		4/10/2018 11:00	4/13/2018 10:40		71:40	Transmission line out of service for construction
	S	4/13/2018 10:40 4/27/2018 16:03	4/13/2018 10:40	4/27/2018 16:03	341:23	341:23	Gas line repair

\*Actual outages dates and hours of duration include scheduled and forced outages.

**LOUISVILLE GAS AND ELECTRIC COMPANY**

**Response to Information Requested in Appendix of  
Commission's Order Dated August 10, 2018**

**Case No. 2018-00219**

**Question No. 16**

**Witness: Stuart Wilson**

Q-16. For the period under review, provide the monthly capacity factor at which each generating unit operated.

A-16. See attached.



**Louisville Gas and Electric Company**  
Unit Capacity Factors by Month

Unit	Capacity Factor (%) (Net MWh)/(period hrs x Net MW rating)					
	Nov 2017	Dec 2017	Jan 2018	Feb 2018	Mar 2018	Apr 2018
Brown 5	1.0	4.0	11.6	0.0	0.0	5.2
Brown 6	1.8	4.3	26.7	2.1	22.0	46.6
Brown 7	1.6	0.0	30.7	1.7	17.2	17.0
Brown Solar	14.1	10.9	10.9	12.2	19.0	24.6
Cane Run 7	41.3	95.7	72.6	89.2	97.7	96.3
Cane Run 11	0.0	0.0	0.0	0.0	0.0	0.0
Mill Creek 1	70.0	72.8	84.5	72.1	42.4	93.3
Mill Creek 2	77.3	67.6	75.5	48.0	25.4	0.0
Mill Creek 3	86.2	76.6	83.6	67.3	87.2	0.0
Mill Creek 4	0.2	76.2	73.4	65.7	75.0	84.6
Ohio Falls 1	21.2	21.9	6.9	0.1	5.0	0.3
Ohio Falls 2	36.9	33.3	13.2	0.2	12.6	0.7
Ohio Falls 3	40.8	57.7	30.0	0.2	16.1	1.8
Ohio Falls 4	39.8	50.7	26.1	0.2	11.8	1.8
Ohio Falls 5	33.2	60.3	26.3	0.2	12.7	2.0
Ohio Falls 6	36.1	71.8	36.2	0.2	19.3	2.3
Ohio Falls 7	2.9	0.0	0.0	0.0	0.0	0.0
Ohio Falls 8	15.9	76.9	39.7	0.3	21.2	2.7
Paddys Run 11	0.0	0.0	0.0	0.0	0.0	0.0
Paddys Run 12	0.0	0.0	0.0	0.0	0.0	0.0
Paddys Run 13	11.6	1.9	16.2	2.1	3.1	5.1
Trimble County 1	4.4	78.8	79.2	72.1	83.2	85.5
Trimble County 2	96.2	66.9	94.4	77.9	0.0	0.0
Trimble County 5	30.4	3.9	20.7	1.0	1.5	5.8
Trimble County 6	18.1	5.1	21.8	1.6	6.0	9.4
Trimble County 7	36.4	5.3	20.4	1.5	26.1	38.2
Trimble County 8	32.6	6.5	21.2	2.7	37.2	36.1
Trimble County 9	13.4	0.9	14.9	1.6	19.0	22.1
Trimble County 10	3.8	3.2	10.8	0.9	4.1	1.1
Zorn	0.00	0.00	0.00	0.00	0.00	0.00

Notes: 1 – Trimble County values reflect 100% of the unit. Trimble County 2 is owned by KU (60.75%), LG&E (14.25%), IMPA (12.88%), and IMEA (12.12%).

2 – The North American Electric Reliability Council Generation Availability Data System defines capacity factor as the value equal to the net MWh produced divided by the product of the hours in the period and the net unit rating.

3 – Jointly owned units are shown for both LG&E and KU and include Brown 5-7, Cane Run 7, Paddys Run 13, Trimble County 2, and Trimble County 5-10.

**LOUISVILLE GAS AND ELECTRIC COMPANY**

**Response to Information Requested in Appendix of  
Commission's Order Dated August 10, 2018**

**Case No. 2018-00219**

**Question No. 17**

**Witness: Michael P. Drake**

- Q-17. a. For the period under review, explain if LG&E made any changes to its maintenance and operation practices, or completed any specific generation efficiency improvements that affect fuel usage at LG&E's generation facilities.
- b. Describe the impact of these changes on LG&E's fuel usage.
- A-17. a-b. There have been no maintenance or operation practice changes that affect fuel usage during the period under review. LG&E strives to maintain unit efficiency through routine cyclic planned outage maintenance. This maintenance work continues to focus on reestablishing expected turbine efficiency through continuous monitoring of all plant systems during operation. LG&E contracts Black and Veatch to provide this monitoring on larger units to identify trends which indicate a potential efficiency loss of any system component. Black and Veatch sends notification to the generating stations which track the potential issues through resolution. In evaluating potential major component projects or replacements that may impact efficiency, LG&E must balance any potential efficiency benefit associated with the project against both costs and potential implications under the Clean Air Act. LG&E has not realized any efficiency improvements through major component projects during this period.

**LOUISVILLE GAS AND ELECTRIC COMPANY**

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Commission's Order Dated August 10, 2018**

**Case No. 2018-00219**

**Question No. 18**

**Witness: Delbert Billiter / Charles R. Schram**

Q-18. State whether LG&E is aware of any violations of its policies and procedures regarding fuel procurement that occurred prior to or during the period under review.

A-18. LG&E is not aware of any violations of its policies and procedures regarding fuel procurement that occurred prior to or during the period under review.

**LOUISVILLE GAS AND ELECTRIC COMPANY**

**Response to Information Requested in Appendix of  
Commission's Order Dated August 10, 2018**

**Case No. 2018-00219**

**Question No. 19**

**Witness: Derek Rahn**

Q-19. State whether LG&E is aware of any violations of 807 KAR 5:056 that occurred prior to or during the period under review.

A-19. LG&E is not aware of any violations of 807 KAR 5:056 that occurred prior to or during the period under review.

**LOUISVILLE GAS AND ELECTRIC COMPANY**

**Response to Information Requested in Appendix of  
Commission's Order Dated August 10, 2018**

**Case No. 2018-00219**

**Question No. 20**

**Witness: Derek Rahn**

- Q-20. State whether all fuel contracts related to commodity and transportation have been filed with the Commission. If any contracts have not been filed, explain why they have not been filed and provide a copy.
- A-20. For the period under review, all fuel contracts related to commodity and/or transportation have been filed with the Commission.