

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

AN ELECTRONIC EXAMINATION BY THE PUBLIC)
SERVICE COMMISSION OF THE ENVIRONMENTAL)
SURCHARGE MECHANISM OF KENTUCKY)
UTILITIES COMPANY FOR THE TWO-YEAR)
BILLING PERIOD ENDING APRIL 30, 2019)

CASE NO.
2019-00205

DIRECT TESTIMONY OF

DEREK A. RAHN
MANAGER, REVENUE REQUIREMENT COS
LG&E AND KU SERVICES COMPANY

Filed: July 26, 2019

1 **Q. Please state your name, title, and business address.**

2 A. My name is Derek A. Rahn. I am the Manager, Revenue Requirement COS for
3 Kentucky Utilities Company (“KU” or “Company”) and Louisville Gas and Electric
4 Company (“LG&E”) and an employee of LG&E and KU Services Company, which
5 provides services to LG&E and KU (collectively “Companies”). My business address
6 is 220 West Main Street, Louisville, Kentucky, 40202. A complete statement of my
7 education and work experience is attached to this testimony as Appendix A.

8 **Q. Have you previously testified before this Commission?**

9 A. Yes. I have previously testified before this Commission in proceedings concerning the
10 Companies’ fuel adjustment clauses, environmental cost recovery (“ECR”) surcharge
11 mechanisms, and the ECR compliance plan proceeding (Case No. 2016-00026 (KU)
12 and Case No. 2016-00027 (LG&E)).

13 **Q. Are you sponsoring any exhibits?**

14 A. Yes. I am sponsoring one exhibit identified as Exhibit DAR-1 – Roll-in.

15 **Q. What is the purpose of this proceeding?**

16 A. The purpose of this proceeding is to review the past operation of KU’s environmental
17 surcharge, including the six-month billing period ending April 30, 2019 that is part of
18 the two-year billing period also ending April 30, 2019, determine whether the surcharge
19 amounts collected during the period are just and reasonable, and then incorporate or
20 “roll-in” such surcharge amounts into KU’s existing electric base rates.

21 **Q. What is the purpose of your testimony?**

22 A. The purpose of my testimony is to summarize the operation of KU’s environmental
23 surcharge during the billing period under review, demonstrate that the amount collected

1 during the period was just and reasonable, present and discuss KU's proposed
2 adjustment to the Environmental Surcharge Revenue Requirement based on the
3 operation of the surcharge during the period and explain how the environmental
4 surcharge factors were calculated during the period under review. In addition, my
5 testimony will recommend that the cumulative ECR revenue requirement for the twelve
6 months ending with the expense month of February 2019 be used for purposes of
7 incorporating or "rolling-into" KU's electric base rates the appropriate surcharge
8 amounts using the methodology previously approved by the Commission, most
9 recently in Case No. 2017-00266.

10 **Q. Please summarize the operation of the environmental surcharge for the billing**
11 **period included in this review.**

12 A. KU billed an environmental surcharge to its customers from November 1, 2018 through
13 April 30, 2019. For purposes of the Commission's examination in this case, the
14 monthly KU environmental surcharges are considered as of the six-month billing
15 period ending April 30, 2019; that same review period is part of the two-year billing
16 period also ending April 30, 2019. (The three previous billing periods were reviewed
17 in Case Nos. 2018-00051, 2018-00257, and 2019-00014.) In each month of the six-
18 month period under review in this proceeding, KU calculated the environmental
19 surcharge factors in accordance with its ECR Tariff, and the requirements of the
20 Commission's previous orders concerning KU's environmental surcharge. The
21 calculations were made in accordance with the Commission-approved monthly forms
22 and filed with the Commission ten days before the new monthly charge was billed by
23 the Company.

1 **Q. What costs were included in the calculation of the environmental surcharge**
2 **factors for the billing period under review?**

3 A. The capital and operating costs included in the calculation of the environmental
4 surcharge factors for the six-month billing period under review were the costs incurred
5 each month by KU from September 2018 through February 2019, as detailed in the
6 attachment in response to Question No. 2 of the Commission Staff's Request for
7 Information, incorporating all required revisions.

8 The monthly environmental surcharge factors applied during the billing period
9 under review were calculated consistent with the Commission's Orders in KU's
10 previous applications to assess or amend its environmental surcharge mechanism and
11 plan, as well as Orders issued in previous review cases. The monthly environmental
12 surcharge reports filed with the Commission during this time reflect the various
13 changes to the reporting forms ordered by the Commission from time-to-time.

14 **Q. Please describe the most recently approved changes to KU's ECR Compliance**
15 **Plan.**

16 A. In Case No. 2017-00483, the Commission approved KU's request to amend to its 2016
17 ECR Compliance Plan and approval of a Certificate of Public Convenience and
18 Necessity ("CPCN"). The proposed amendment would construct a smaller coal
19 combustion residuals landfill than the Commission had previously approved and cap
20 and close the remaining surface areas of the main ash pond at Brown. Pursuant to the
21 Commission's July 9, 2018 Order approving the requested amendment and CPCN, KU
22 began including the amended projects in the monthly filing for the June 2018 expense
23 month that was billed in August 2018.

1 **Q. Please describe the most recently approved changes to the environmental**
2 **surcharge mechanism and the monthly ES Forms.**

3 A. There were two changes approved in Case No. 2019-00014, KU's most recent ECR
4 six-month review case.

5 First, the Commission increased the return on equity to be used in the monthly
6 environmental surcharge filings to 9.725% for all ECR Plans. Pursuant to the
7 Commission's April 30, 2019 Order, the changes were implemented with the April
8 2019 expense month that was billed in June 2019. The higher return on equity,
9 therefore, will not impact the recovery of costs for this review period. However, the
10 higher return on equity will be used in this proceeding to establish the overall rate of
11 return on capital to be used to calculate the environmental surcharge in future filings as
12 discussed later in this testimony.

13 Second, the Commission approved a form change on ES Form 2.00 which
14 eliminated the section for Proceeds From By-Product and Allowance Sales.

15 **Q. Is KU proposing any changes to the environmental surcharge mechanism and the**
16 **monthly ES Forms?**

17 A. No, there are currently no needed changes to the ES Forms.

18 **Q. Is KU proposing any changes to its Environmental Cost Recovery Surcharge**
19 **tariff?**

20 A. No. There are currently no needed changes to the Environmental Cost Recovery
21 Surcharge tariff.

22 **Q. Are there any changes or adjustments in Rate Base from the originally filed**
23 **expense months?**

1 A. No. During the period under review, there were no changes to Rate Base from the
2 originally filed billing months as summarized in KU's response to the Commission
3 Staff's Request for Information, Question No. 1.

4 **Q. Are there any changes necessary to the jurisdictional revenue requirement**
5 **(E(m))?**

6 A. Yes. Adjustments to E(m) are necessary for compliance with the Commission's Order
7 in Case No. 2000-00439 to reflect the actual changes in the overall rate of return on
8 capitalization that is used in the determination of the return on environmental rate base.

9 Pursuant to the terms of the Settlement Agreement approving the 2011 ECR
10 Plan, KU calculated the short- and long-term debt rate using average daily balances
11 and daily interest rates in the calculation of the overall rate of return true-up adjustment
12 for the six-month period ending February 28, 2019. For the expense months of
13 September 2018 through February 2019, the weighted average cost of capital was based
14 on the balances as of February 28, 2019 and the 9.70% return on equity for all Plan
15 projects. The details of and support for these calculations are shown in LG&E's
16 response to Question No. 1 of the Commission Staff's First Request for Information.

17 **Q. Are there any other corrections to information provided in the monthly filings**
18 **during the billing period under review?**

19 A. No. There are no corrections to information provided in the monthly filings during the
20 six-month billing period under review.

21 **Q. As a result of the operation of the environmental surcharge during the billing**
22 **period under review, is an adjustment to the revenue requirement necessary?**

1 A. Yes. KU experienced an over-recovery of \$600,966 for the billing period ending April
2 30, 2019. KU's response to Question No. 2 of the Commission Staff's Request for
3 Information shows the calculation of the over-recovery. An adjustment to the revenue
4 requirement is necessary to reconcile the collection of past surcharge revenues with
5 actual costs for the billing period under review.

6 **Q. Has KU identified the causes of the over-recovery during the billing period under**
7 **review?**

8 A. Yes. KU has identified the primary components that make up the over-recovery during
9 the billing period under review. The components are: (1) changes in overall rate-of-
10 return as previously discussed, and (2) the use of 12-month average revenues to
11 determine the billing factor. The details and support of the components that make up
12 the under-recovery during the billing period under review are shown in KU's response
13 to Question No. 2 of the Commission Staff's Request for Information.

14 **Q. Please explain how the function of the ECR mechanism contributes to the**
15 **recovery position in the billing period under review.**

16 A. The use of 12-month average revenues to calculate the monthly billing factors and then
17 applying those same billing factors to the actual monthly revenues will result in an
18 over- or under-collection of ECR revenues. The table below shows a comparison of
19 the 12-month average revenues used in the monthly filings to determine the ECR billing
20 factors and the actual revenues to which the ECR billing factors were applied in the
21 billing month.

Expense Month	12-Month Average Revenues	Billing Month	Actual Revenues Subject to ECR Billing Factors
September 2018	\$105,919,003.00	November 2018	\$89,287,703.07
October 2018	\$106,257,497.00	December 2018	\$106,590,633.59
November 2018	\$106,180,374.00	January 2019	\$112,878,849.46
December 2018	\$106,399,809.00	February 2019	\$113,203,655.73
January 2019	\$104,026,523.00	March 2019	\$104,310,024.55
February 2019	\$103,628,845.00	April 2019	\$88,037,848.35
*The 12-month average revenues and the Actual Revenues subject to ECR Billing Factors reflect net revenues for Group 2.			

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Generally, an under-recovery will occur when actual revenues for the billing month are less than the 12-month average revenues used for the expense month.

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Likewise, an over-recovery will usually occur when actual revenues for the billing

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month are greater than the 12-month average revenues used for the expense month.

6 **Q.**

What kind of adjustment is KU proposing in this case as a result of the operation of the environmental surcharge during the billing period?

7

8 **A.**

KU is proposing that the over-recovery be collected in one month following the Commission's Order in this proceeding. Specifically, KU recommends that the Commission approve a decrease to the Environmental Surcharge Revenue Requirement of \$600,966 for one month, beginning in the second full billing month following the Commission's Order in this proceeding. This method is consistent with the method of implementing previous over- or under- recovery positions in prior ECR review cases.

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15 **Q.**

What is the bill impact on a residential customer for the proposed collection of the over-recovery?

16

1 A. The inclusion of the collection reflecting the over-recovery position in the
2 determination of the ECR billing factor will decrease the billing factor by
3 approximately 0.48%. For a residential customer using an average of 1,180 kWh per
4 month, the impact of the adjusted ECR billing factor would be a decrease of
5 approximately \$0.58 for one month.

6 **Q. Should the Commission approve incorporating into KU's base rates the**
7 **environmental surcharge amounts found just and reasonable for the two-year**
8 **billing period ending April 2019?**

9 A. Yes. In Exhibit DAR-1, KU provides the surcharge amount that KU believes should
10 be incorporated into its existing base rates. The exhibit includes all supporting
11 calculations, work papers, and assumptions. It is now appropriate to incorporate into
12 electric base rates the surcharge amounts the Commission finds just and reasonable for
13 the two-year billing period ending April 2019. KU recommends that an incremental
14 environmental surcharge amount of \$10,168,724 be incorporated into base rates at the
15 conclusion of this case. KU determined the incremental roll-in amount of \$10,168,724
16 using environmental surcharge rate base as of February 28, 2019 and environmental
17 surcharge operating expenses for the twelve-month period ending February 28, 2019.
18 If approved, the total amount of environmental surcharge that will be included in base
19 rates will be \$154,448,344. The implementation of the change in base rates reflecting
20 the roll-in amount should take effect with bills rendered beginning with the first billing
21 cycle in the second month following the month in which the Commission issues its
22 Order in this proceeding.

23 **Q. How should the surcharge amount be incorporated into KU's base rates?**

1 A. The surcharge factor reflects a percentage of revenue approach, rather than a per-kWh
2 approach. The Commission previously approved KU's proposed roll-in methodology
3 in Case Nos. 2011-00231, 2013-00242, 2015-00221, and most recently in 2017-00266.

4 KU uses a two-step roll-in methodology as shown below:

5 Step #1 – Customer Group Allocation: Allocate the roll-in between Group 1 and Group
6 2 customers based on the percentage of each group's total base revenue to KU's
7 total base revenue (excluding base environmental surcharge revenue).

8 Step #2 – Group Rate Class Allocation:

- 9 • Group 1 amount from Step 1 is allocated to the Group 1 rate classes based on total
10 base revenues excluding base environmental surcharge revenues.
- 11 • Group 2 amount from Step 1 is allocated to Group 2 rate classes based on non-fuel
12 base revenues excluding base environmental surcharge revenues.

13 Furthermore, for Group 1 and Group 2, the amount of the roll-in will be spread
14 to the energy portion of rates (without a demand charge) and to the demand portion of
15 rates (with a separately metered and billed demand component). Lastly, lighting rates
16 will continue to be billed on a per-light basis.

17 KU recommends that this method continue to be used to accomplish this roll-
18 in to base rates.

19 **Q. Does KU believe that modifications will need to be made to either the surcharge**
20 **mechanism or the monthly surcharge reports as a result of incorporating**
21 **additional environmental surcharge amounts into KU's existing base rates?**

1 A. No. The incorporation of additional environmental surcharge revenues into existing
2 base rates does not require modifications to the surcharge mechanism or monthly ES
3 Forms.

4 **Q. If the Commission accepts KU's recommendation to incorporate the proposed**
5 **amount into base rates, what will be the impact on KU's ECR revenue**
6 **requirement?**

7 A. The incorporation of the recommended surcharge amount into base rates will increase
8 base rates and, two months later, decrease ECR revenues by an equal amount. There
9 will be no impact on the environmental costs KU is allowed to recover from its
10 customers; only the method of collection will be impacted.

11 **Q. Please explain why ECR revenues will not decrease in the same month that base**
12 **rates will increase.**

13 A. The ECR is billed on a two-month lag, meaning that costs are incurred, for example, in
14 February 2019 (expense month) and ECR billing factor revenues are collected two
15 months later in April 2019 (billing month). KU's determination of costs recoverable
16 through the billing factor (E(m) for the expense month) are reduced by the ECR
17 revenue included in base rates. Therefore, total ECR costs for the month of February
18 are collected from customers through base rates in February and through the ECR
19 billing mechanism in April. If base rates increase due to a roll-in in February, the
20 portion of ECR costs incurred in February that is recovered through base rates will
21 increase and the resulting decrease in the ECR billing factor will be applied in April.
22 If the decrease in the ECR billing factor were applied in February, the same month that
23 base rates change, then KU would not be collecting the correct amount of ECR revenue

1 associated with costs incurred in December. This is because the February billing factor
2 is associated with the December expense month and must be calculated using base rates
3 in effect in December.

4 **Q. What rate of return is KU proposing to use for all ECR Plans upon the**
5 **Commission's Order in this proceeding?**

6 A. KU is recommending an overall rate of return on capital of 8.75%, including the
7 currently approved 9.725% return on equity and adjusted capitalization, to be used to
8 calculate the environmental surcharge. This is based on capitalization as of February
9 28, 2019, the Commission's Order of April 30, 2019 in Case No. 2019-00014 and use
10 of the 2019 gross-up revenue factor that excludes the §199 manufacturing tax
11 deduction.

12 See the response and attachment to Commission Staff's Request for
13 Information Question No. 5 following this testimony.

14 **Q. What is your recommendation to the Commission in this case?**

15 A. KU makes the following recommendations to the Commission in this case:

- 16 a) The Commission should approve the proposed increase to the Environmental
17 Surcharge Revenue Requirement of \$600,966 for one month beginning in the
18 second full billing month following the Commission's Order in this proceeding;
- 19 b) The Commission should determine the environmental surcharge amount for the
20 six-month billing period ending April 30, 2019 to be just and reasonable;
- 21 c) The Commission should approve the use of an overall rate of return on capital
22 of 8.75% using a return on equity of 9.725% beginning in the second full billing
23 month following the Commission's Order in this proceeding, and;

1 d) The Commission should approve a “roll-in” of \$10,168,724 in incremental
2 environmental costs into KU’s base rates, for a total base rate ECR component
3 of \$154,448,344, to be included in base rates following the methodology
4 previously approved by the Commission and implemented by KU. The
5 implementation of the change in base rates reflecting the roll-in amount should
6 take effect with bills rendered beginning with the first billing cycle in the second
7 month following the month in which the Commission issues its Order in this
8 proceeding.

9 **Q. Does this conclude your testimony?**

10 A. Yes.

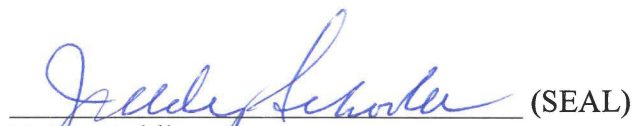
VERIFICATION

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 foregoing testimony, and that 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 24th day of July 2019.


Notary Public (SEAL)

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

APPENDIX A

Derek A. Rahn

Manager, Revenue Requirement COS
LG&E and KU Services Company
220 West Main Street
Louisville, Kentucky 40202
(502) 627-4127

Previous Positions

Manager, Transmission Policy & Tariffs	Sept. 2010 – Oct. 2015
Group Leader, Transmission Operations Engineering	Dec. 2008 – Sept. 2010
Supervisor, Operations (Ghent Power Station)	Dec. 2007 – Dec. 2008
Electrical Engineer II (Ghent Power Station)	Jul. 2005 – Dec. 2007
Project Engineer (TubeMaster, Inc)	Dec 2003 – Jul. 2005

Education

Masters of Business Administration,
Bellarmine University, July 2010.
Bachelor of Science in Electrical Engineering,
University of Kentucky, December 2003.

Training:

Managing People & Processes (2014), IUS Leadership Program (2007-2008), Professional Development Program (2007-2008), Global Leadership Summit (2013, 2015, & 2017), Mentoring Program (2008, 2014 - 2019), Advanced Operator (2008), Project Management (2006), and Basic Shaft Alignment (2006).

Civic Activities

Power of One Committee Member (2007 – 2019)
Saratoga Springs Neighborhood Association Board (2017- 2019)

Kentucky Utilities Company

Calculation of ECR Roll-in At February 28, 2017

		Environmental Compliance Plans at Feb. 28, 2019	Jurisdictional Basis
Calculation of Revenue Requirement for Roll-In:			
Environmental Compliance Rate Base			
Pollution Control Plant in Service		1,349,554,397	1,190,718,402
Pollution Control CWIP Excluding AFUDC	ES Form 2.00, February 2019	318,679,885	281,172,811
Subtotal		1,668,234,282	1,471,891,213
Additions:			
Emission Allowances	ES Form 2.00, February 2019	127,417	112,421
Cash Working Capital Allowance	ES Form 2.00, February 2019	2,691,844	2,375,027
Net Unamortized Claosure Cost Balance - Active Stations	ES Form 2.00, February 2019	30,194,967	26,641,166
Net Unamortized Claosure Cost Balance - Retired Stations	ES Form 2.00, February 2019	21,896,490	19,319,380
Subtotal		54,910,718	48,447,993
Deductions:			
Accumulated Depreciation on Pollution Control Plant	ES Form 2.00, February 2019	124,169,683	109,555,515
Pollution Control Deferred Income Taxes	ES Form 2.00, February 2019	305,797,716	269,806,811
Subtotal		429,967,399	379,362,325
Environmental Compliance Rate Base		\$ 1,293,177,601	\$ 1,140,976,881
Rate of Return -- Environmental Compliance Rate Base	ES Form 1.10, February 2019	8.86%	
Return on Environmental Compliance Rate Base		\$ 114,575,535	\$ 101,090,552
Pollution Control Operating Expenses			
12 Month Depreciation and Amortization Expense	See Support Schedule A	32,639,762	28,798,221
12 Month Taxes Other than Income Taxes	See Support Schedule A	1,876,226	1,655,403
12 Month Operating and Maintenance Expense	See Support Schedule A	22,818,502	20,132,875
12 Month Emission Allowance Expense	See Support Schedule A	3,356	2,961
12 Month CCR Amortization	See Support Schedule A	4,421,366	3,900,993
12 Month Beneficial Reuse Expense, net of amounts in base rates	See Support Schedule A	(1,283,752)	(1,132,660)
12 Month KPSC Consultant Expense	See Support Schedule A	-	-
Total Pollution Control Operating Expenses		\$ 60,475,461	\$ 53,357,793
Gross Proceeds from Allowance Sales	See Support Schedule B	-	-
Total Company Environmental Surcharge Gross Revenue Requirement -- Roll In Amount			
Return on Environmental Compliance Rate Base		114,575,535	101,090,552
Pollution Control Operating Expenses		60,475,461	53,357,793
Less Gross Proceeds from Allowance Sales		-	-
Roll In Amount		\$ 175,050,996	\$ 154,448,344
Jurisdictional Allocation Ratio -- Roll In	See Support Schedule C	88.2305%	
Jurisdictional Revenues for 12 Months for Roll In	See Support Schedule C	1,530,688,534	
Roll In Jurisdictional Environmental Surcharge Factor:			
Total Company Environmental Surcharge Gross Revenue Requirement -- Roll In Amount		\$ 175,050,996	
Jurisdictional Allocation Ratio -- Roll In		88.2305%	
Jurisdictional Environmental Surcharge Gross Revenue Requirement -- Gross Roll In Amount		\$ 154,448,344	
Less Jurisdictional Environmental Revenue Previously Rolled In		144,279,620	
Jurisdictional Environmental Surcharge Gross Revenue Requirement -- Net Roll In Amount		\$ 10,168,724	

Kentucky Utilities Company
Calculation of ECR Roll-in At February 28, 2017

Support Schedule A

12 Month Balances for Selected Operating Expense Accounts

Current Plans

	Depreciation & Amortization	Taxes Other than Income Taxes	Operating and Maintenance Expense			Monthly CCR Amort. - Active & Retired Stations	Amortization of Excess ADIT with Gross-Up	Emission Allowance Expense	Beneficial Reuse Expense	KPSC Consultant Expense	Total	
			Steam Plant	FERC 502	FERC 506							FERC 512
			FERC 509	FERC 501								
Mar-18	\$ 2,706,306	\$ 156,859	\$ 404,861	\$ 776,739	\$ 633,751	\$ 219,722	\$ -	\$ 286	\$ 18,221	\$ -	4,916,746	
Apr-18	2,706,306	156,859	260,805	870,704	693,373	245,745	-	325	(10,991)	-	4,923,126	
May-18	2,706,306	156,859	260,713	1,126,016	773,206	260,810	-	339	(43,609)	-	5,240,639	
Jun-18	2,712,048	156,859	264,691	999,724	742,210	288,289	(194,069)	302	(21,815)	-	4,948,238	
Jul-18	2,717,283	156,805	260,921	1,112,541	766,517	311,931	(33,926)	330	24,976	-	5,317,379	
Aug-18	2,716,777	156,810	392,952	1,163,779	716,740	357,496	(190,892)	339	43,059	-	5,357,060	
Sep-18	2,720,314	156,809	271,550	823,064	641,321	381,178	(52,361)	264	21,175	-	4,963,314	
Oct-18	2,726,209	156,809	72,956	802,637	1,070,520	417,422	(52,361)	370	25,411	-	5,219,972	
Nov-18	2,728,566	156,810	282,163	796,683	873,024	439,190	(52,361)	284	44,460	-	5,268,818	
Dec-18	2,728,616	156,811	197,799	836,309	910,923	479,971	(52,361)	163	5,967	-	5,264,198	
Jan-19	2,736,248	154,110	178,486	812,465	448,167	504,019	(55,017)	221	4,225	-	4,782,923	
Feb-19	2,734,783	153,826	195,582	849,781	534,830	515,593	(55,017)	133	11,849	-	4,941,359	
less Base Rate amount									(1,406,678)		(1,406,678)	
Totals	\$ 32,639,762	\$ 1,876,226	\$ 3,043,481	\$ 10,970,441	\$ 8,804,580	\$ 4,421,366	\$ -	\$ 3,356	\$ (1,283,752)	\$ -	\$ 60,475,461	

Support Schedule B

12 Month Balances for Allowance Sales

	Total Proceeds from Allowance Sales
	ES Form 2.00
Mar-18	\$ -
Apr-18	-
May-18	-
Jun-18	-
Jul-18	-
Aug-18	-
Sep-18	-
Oct-18	-
Nov-18	-
Dec-18	-
Jan-19	-
Feb-19	-
Totals	\$ -

Support Schedule C

12 Month Balances for Jurisdictional Revenues and Allocation Ratio

	KY Retail Revenues, Excl. Envir. Surch. Revenues	Total Company Revenues, Excluding Envir. Surch. Revenues	KY Retail Allocation Ratio
	ES Form 3.10	ES Form 3.10	KY Retail/ Total Company
Mar-18	\$ 128,417,654	\$ 144,399,115	88.93%
Apr-18	124,193,791	140,933,364	88.12%
May-18	117,412,428	132,457,838	88.64%
Jun-18	128,609,010	144,740,197	88.86%
Jul-18	136,766,692	154,667,492	88.43%
Aug-18	137,253,047	153,883,949	89.19%
Sep-18	126,100,629	144,702,678	87.14%
Oct-18	121,498,724	139,251,797	87.25%
Nov-18	109,039,201	125,481,081	86.90%
Dec-18	127,664,543	144,095,235	88.60%
Jan-19	135,963,756	154,004,578	88.29%
Feb-19	137,769,059	156,257,555	88.17%
Totals	\$ 1,530,688,534	\$ 1,734,874,878	88.23%