

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF)
KENTUCKY UTILITIES COMPANY FOR AN)
ADJUSTMENT OF ITS ELECTRIC RATES, A)
CERTIFICATE OF PUBLIC CONVENIENCE)
AND NECESSITY TO DEPLOY ADVANCED) CASE NO. 2020-00349
METERING INFRASTRUCTURE,)
APPROVAL OF CERTAIN REGULATORY)
AND ACCOUNTING TREATMENTS, AND)
ESTABLISHMENT OF A ONE-YEAR)
SURCREDIT)

In the Matter of:

ELECTRONIC APPLICATION OF)
LOUISVILLE GAS AND ELECTRIC)
COMPANY FOR AN ADJUSTMENT OF ITS)
ELECTRIC AND GAS RATES, A)
CERTIFICATE OF PUBLIC CONVENIENCE)
AND NECESSITY TO DEPLOY ADVANCED) CASE NO. 2020-00350
METERING INFRASTRUCTURE,)
APPROVAL OF CERTAIN REGULATORY)
AND ACCOUNTING TREATMENTS, AND)
ESTABLISHMENT OF A ONE-YEAR)
SURCREDIT)

DIRECT TESTIMONY OF
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MANAGING PARTNER
THE PRIME GROUP, LLC

Filed: November 25, 2020

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Exhibits

- Exhibit WSS-1 – Qualifications
- Exhibit WSS-2 – Cost Components for Residential Service Rate RS
- Exhibit WSS-3 – Cost Support for General Time-of-Day Service Rates
- Exhibit WSS-4 – Cost Support for LED Fixture and Underground Pole Charges
- Exhibit WSS-5 – Cost Support for LED Conversion Fee
- Exhibit WSS-6 – Westar’s Residential Distributed Generation Rate
- Exhibit WSS-7 – Kansas Corp. Commission’s Order Regarding Distributed Generation
- Exhibit WSS-8 – Traditional Metering Equipment Required for Four-Part Rates
- Exhibit WSS-9 – Electric Vehicle Ownership by State in U.S.
- Exhibit WSS-10 – DC Fast Charging Ports versus Electric Vehicles by State in U.S.
- Exhibit WSS-11 – Cost Support for Electric Vehicle Supply Equipment Rate and Rider
- Exhibit WSS-12 – Cost Support for Redundant Capacity Charge
- Exhibit WSS-13 – Summary of Class Rates of Returns for Gas Operations
- Exhibit WSS-14 – Analysis of Subsidy Reduction for Gas Operations
- Exhibit WSS-15 – Cost Components for Residential Gas Service Rate RGS
- Exhibit WSS-16 – Cost Support for Pole Attachment Charge
- Exhibit WSS-17 – Cost Support for Excess Facilities Rider
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- Exhibit WSS-19 – Cost Support for Miscellaneous Charges
- Exhibit WSS-20 – Change in Other Operating Revenues for Other Misc. Charges
- Exhibit WSS-21 – LOLP Analysis for Electric COS
- Exhibit WSS-22 – Comparison of LOLP with 12-CP and 6-CP Methodologies
- Exhibit WSS-23 – Zero Intercept Overhead Conductor (KU)
- Exhibit WSS-24 – Zero Intercept Underground Conductor (KU)
- Exhibit WSS-25 – Zero Intercept Line Transformers (KU)
- Exhibit WSS-26 – Zero Intercept Overhead Conductor (LG&E)
- Exhibit WSS-27 – Zero Intercept Underground Conductor (LG&E)
- Exhibit WSS-28 – Zero Intercept Line Transformers (LG&E)
- Exhibit WSS-29 – Electric COS Functional Assignment (KU)
- Exhibit WSS-30 – Electric COS Functional Assignment (LG&E)
- Exhibit WSS-31 – Electric COS Class Allocation (KU)
- Exhibit WSS-32 – Electric COS Class Allocation (LG&E)
- Exhibit WSS-33 – Gas Transmission Plant Functional Assignment for COS
- Exhibit WSS-34 – Zero Intercept Distribution Mains
- Exhibit WSS-35 – Low-, Medium-, and High-Pressure Distribution Mains
- Exhibit WSS-36 – Gas COS Functional Assignment and Classification
- Exhibit WSS-37 – Gas COS Class Allocation
- Exhibit WSS-38 – Gas COS Storage Allocation
- Exhibit WSS-39 – Summary Results of Lead-Lag Study

1 **I. INTRODUCTION**

2 **Q. Please state your name and business address.**

3 A. My name is William Steven Seelye. My business address is 2604 Sunningdale Place
4 East, La Grange, Kentucky 40031.

5 **Q. By whom and in what capacity are you employed?**

6 A. I am the managing partner for The Prime Group, LLC, a firm located in La Grange,
7 Kentucky, providing consulting and educational services in the areas of utility
8 regulatory analysis, revenue requirement support, cost of service, rate design and
9 economic analysis.

10 **Q. On whose behalf are you testifying in these proceedings?**

11 A. I am testifying on behalf of Kentucky Utilities Company (“KU”), which provides
12 electric service to utilities throughout Kentucky, and Louisville Gas and Electric
13 Company (“LG&E”) (collectively, “Companies”), which provides both electric and
14 natural gas sales and delivery services in Louisville-Jefferson County and surrounding
15 counties in Kentucky.

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

17 A. The purpose of my testimony is (i) to describe the proposed allocation of the revenue
18 increases for KU and for LG&E’s electric and natural gas operations; (ii) to support
19 KU and LG&E’s proposed rates; (iii) to sponsor the fully allocated cost of service
20 studies based on KU and LG&E’s embedded cost of providing electric and natural gas
21 service for the fully forecasted test year, which is the 12 months beginning July 1,

1 2021; and (iv) to sponsor the revenue lag portion of the updated revenue lag study for
2 KU and LG&E.

3 **Q. Please summarize your testimony.**

4 A. My direct testimony addresses the following:

- 5 • **Cost of Service Studies and the Allocation of the Revenue Increase.** In
6 developing their proposed rates in these proceedings, KU and LG&E considered
7 the results of the cost of service studies. The purpose of a class cost of service
8 study is to determine the contribution that each customer class is making towards
9 the utility’s overall rate of return. Cost of service is a standard measure of
10 reasonableness for utility rate design. Rates of return are calculated for each rate
11 class. In the electric cost of service studies, production fixed costs were allocated
12 based on hourly class loads weighted by the hourly Loss of Load Probability
13 (“LOLP”), which is a key measure that has been used by KU and LG&E for many
14 years to plan their generation resources. The Companies used the LOLP as an
15 electric cost of service methodology in their 2016 and 2018 rate cases. In
16 accordance with the Commission’s Order in Case Nos. 2018-00294 and 2018-
17 00295, KU and LG&E are also submitting 6 Coincident Peak (“6-CP”) and 12
18 Coincident Peak (“12-CP”) cost of service studies as alternatives to the LOLP cost
19 of service proposed by the Companies. LG&E’s gas cost of service study used the
20 same methodology as was filed in its 2018 and prior rate cases. The Companies’
21 class cost of service studies were also used as a guide for allocating the revenue
22 increase to the rate classes and for developing unit charges for electric and gas
23 service.
- 24 • **Elimination of Environmental Cost Recovery (ECR) Surcharge and Gas Line
25 Tracker (GLT) Projects.** KU and LG&E are proposing to eliminate certain ECR
26 projects. LG&E is also proposing to eliminate all but two GLT projects. The
27 test-year costs of these projects will be transferred into base rates.
- 28 • **Continued Separation of Rates into Infrastructure and Variable Cost
29 Components.** KU and LG&E are also proposing to continue to separate out the
30 infrastructure and variable cost components of the energy charge for Residential
31 Service (Rate RS), General Service (Rate GS) and other two-part rates that include
32 only a customer charge and an energy charge. The purpose of this structure in the
33 presentation of these rate schedules is to provide more information to customers,
34 stakeholders and employees about which costs are avoidable through the
35 installation of distributed generation (i.e., the variable cost component) and which
36 costs are less likely to be avoided (i.e., the fixed cost component). In its Orders
37
38

1 in Case Nos. 2018-00294 and 2018-00295, the Commission ruled that splitting the
2 energy charges into infrastructure and variable components for information
3 purposes is reasonable. My testimony will address the continued importance of
4 this practice.
5

- 6 • **Residential Time-of-Day Services.** The Companies are proposing to modify
7 Residential Time-of-Day Service (Rates RTOD-E and RTOD-D) to shift the
8 morning peak period by one hour to more accurately reflect current peak periods
9 and to add evening hours to the winter peak period. The on- and off-peak charges
10 are adjusted to reflect this change.
11
- 12 • **General Time-of-Day Services.** The Companies are proposing to offer optional
13 General Time of Day Services (Rate GTOD – Energy and GTOD - Demand) rate
14 schedules that would be available to any General Service (Rate GS) customer
15 enrolled under the Advanced Metering Systems Customer Service Offering set
16 forth in the Companies’ Demand-Side Management Cost Recovery Mechanism.
17
- 18 • **Lighting Rates.** The Companies are introducing three new light emitting diode
19 (LED) lighting offerings. In its Orders in Case Nos. 2018-00294 and 2018-00295,
20 the Commission approved an LED Conversion Fee that applies whenever a
21 customer requests the replacement of a working non-LED fixture with an LED
22 fixture prior to the failure of the non-LED fixture. The current LED Conversion
23 Fee, which provides for the recovery of the stranded costs created by the
24 replacement of a working non-LED fixture with an LED fixture, is a fixed charge
25 that applies for a period of five years. The Companies are proposing to offer an
26 alternative in which customers can make an up-front payment of the LED
27 Conversion Fee. For Outdoor Sports Lighting Service (Rate OSL), the Companies
28 are proposing to reduce the number of hours during the peak period by one hour.
29
- 30 • **Net Metering.** In March 2019, Senate Bill 100 was signed into law thereby
31 modifying 278.466 to allow each electric utility to implement rates to recover from
32 *non-grandfathered* or *new* net metering customers “all costs necessary to serve its
33 eligible customer-generators, including but not limited to fixed and demand-based
34 costs, without regard for the rate structure for customers who are not eligible
35 customer-generators.” The Companies are proposing a new net metering service
36 called “Net Metering Service 2 – NMS 2” that will be applicable to new net
37 metering customers taking service on or after the effective date of the new rates
38 approved in these proceedings.
39
- 40 • **Electric Vehicle Rates.** The Companies are proposing to offer a new Electric
41 Vehicle Fast Charging Service (Rate EV-FAST). Under the proposed rate, KU
42 and LG&E would charge \$0.25 per kWh for charging at Direct Current Fast

1 Charging Stations (DCFCs) that would be installed by the Companies in late 2022.
2 Because spending for the stations would occur after the end of the forecasted test
3 year in these proceedings, none of the costs are included in revenue requirements.
4

5 • **Annual Waiver of Non-Residential Late Payment Charges.** In Case Nos.
6 2018-00294 and 2018-00295, the Companies implemented a program to waive
7 late payment charges for residential customers who have not been late in paying
8 their bills during each of the previous 11 months. The Companies are proposing
9 to extend this practice to non-residential customers.

10
11 • **Miscellaneous Charges.** The Companies are proposing changes in certain
12 miscellaneous charges to reflect changes in costs. The Companies are also
13 proposing miscellaneous charges related to the proposed Advanced Metering
14 Infrastructure (AMI) deployment.

15
16 • **Update to the Lead-Lag Studies.** The revenue lags in the study submitted in the
17 Companies' last rate cases were updated for the calendar year 2019.
18

19 **Q. Are you supporting certain information required by Commission Regulations**
20 **807 KAR 5:001, Section 16(7) and 16(8)?**

21 A. Yes. I am sponsoring the following schedules for the corresponding Filing
22 Requirements:

- | | | | |
|----|---------------------------|------------------|--------|
| 23 | • Cost of Service Studies | Section 16(7)(v) | Tab 52 |
| 24 | • Revenue Summary | Section 16(8)(m) | Tab 66 |

25 **Q. How is your testimony organized?**

26 A. My testimony is divided into the following sections: (I) Introduction, (II)
27 Qualifications, (III) Electric Rate Design and the Allocation of the Increases, (IV) Gas
28 Rate Design and the Allocation of the Increase, (V) Miscellaneous Service Charges,
29 (VI) Advanced Metering Infrastructure (AMI), (VII) Electric Cost of Service Studies,
30 (VIII) Gas Cost of Service Study, and (IX) Lead-Lag Studies.

1 **II. QUALIFICATIONS**

2 **Q. Please describe your educational and professional background.**

3 A. I received a Bachelor of Science degree in Mathematics from the University of
4 Louisville in 1979. I have also completed 54 hours of graduate level course work in
5 Industrial Engineering and Physics. From 2014 through 2015 I completed an
6 additional 12 hours of Electrical Engineering coursework at the University of
7 Louisville's Speed School of Engineering (courses in computer design,
8 microcontroller programming, digital signal processing, and computer
9 communications). In addition, from 2012 through 2015, I was an instructor at
10 Louisville's Walden School and a private tutor and instructor in advanced placement
11 calculus, linear algebra, pre-calculus, college algebra and differential equations.

12 Concerning my professional background, from May 1979 until July 1996, I
13 was employed by LG&E. From May 1979 until December 1990, I held various
14 positions within the Rate Department of LG&E. In December 1990, I became
15 Manager of Rates and Regulatory Analysis. In May 1994, I was given additional
16 responsibilities in the marketing area and was promoted to Manager of Market
17 Management and Rates. I left LG&E in July 1996 to form The Prime Group, LLC,
18 with two other former employees of LG&E. Since leaving LG&E, I have performed
19 or supervised the preparation of cost of service and rate studies for over 150 investor-
20 owned utilities, rural electric distribution cooperatives, generation and transmission
21 cooperatives, and municipal utilities. Therefore, including my time at LG&E, I have
22 more than 40 years of experience in the utility industry. A more detailed description

1 of my qualifications is included in Exhibit WSS-1.

2 **Q. Have you ever testified before any state or federal regulatory commissions?**

3 A. Yes. I have testified in over 75 regulatory and court proceedings in 13 different
4 jurisdictions. I have testified before the Kentucky Public Service Commission on
5 behalf of both KU and LG&E, as well as on behalf of other utilities, on numerous
6 occasions. A listing of my testimony in other proceedings is included in Exhibit WSS-
7 1.

8 **Q. Please describe your work and testimony experience as they relate to topics**
9 **addressed in your testimony.**

10 A. I have performed or supervised the development of cost of service and rate studies for
11 over 150 utilities throughout North America. I have testified on numerous occasions
12 regarding the rates proposed by electric, gas and water utilities, including KU and
13 LG&E. I have also testified on numerous occasions regarding lead-lag studies.

14

15 **III. ELECTRIC RATE DESIGN AND THE ALLOCATION OF THE INCREASES**

16 **A. ALLOCATION OF THE ELECTRIC INCREASES**

17 **Q. Please summarize your recommendations for allocating the electric revenue**
18 **increases to the classes of service.**

19 A. The Companies are proposing an overall revenue increase of \$170,120,598 for KU,
20 which corresponds to a 10.36% increase, and a \$131,073,276, revenue increase for
21 LG&E, which corresponds to an 11.61% increase. The Companies are also proposing

1 changes in miscellaneous charges which result in changes to other operating revenue.
2 Accounting for changes in other operating revenue, the overall increase in revenues
3 from *sales to ultimate customers* is \$169,747,181 (or 10.57%) for KU and
4 \$130,983,319 (or 11.83%) for LG&E. (See Schedule M-2.1 for KU and Schedule M-
5 2.1-E for LG&E in the Companies' Filing Requirements.)

6 Except for the lighting rates, KU is proposing to increase revenues for all rate
7 classes by approximately 10.68%. Based on the results of the cost of service study,
8 KU is proposing no net increases, within rounding, for Lighting Service (Rate LS),
9 Restricted Lighting Service (Rate RLS), Lighting Energy Service (Rate LE), and
10 Traffic Energy Service (TE). KU is proposing a rate reduction for Outdoor Lighting
11 Service (Rate OSL), which is an optional pilot program, of approximately 5.00%. KU
12 is proposing no changes to the rate credits set forth in its Curtailable Service Rider
13 (CSR).

14 Except for three lighting rates, LG&E is proposing to increase revenues for all
15 rate classes by approximately 11.80%. LG&E is proposing no increases, within
16 rounding, for Lighting Energy Service (Rate LE) and Traffic Energy Service (TE).
17 LG&E is proposing a rate reduction for Outdoor Lighting Service (Rate OSL), which
18 is an optional pilot program, of approximately 10.00%. LG&E is proposing no
19 changes to the rate credits set forth in its Curtailable Service Rider (CSR).

20 Both KU and LG&E are proposing to increase the disconnect/reconnect
21 charges and returned check charges. The Companies are proposing to decrease the
22 unauthorized reconnect charges. KU and LG&E are proposing minor changes to

1 certain other miscellaneous charges, which will be discussed later in my testimony.

2 **Q. Have you prepared schedules showing the proposed revenue increase for each**
3 **standard rate schedule?**

4 A. Yes. The electric revenue increases for each rate class are shown on Schedule M-2.1
5 of Section 16(8)(m) of the Filing Requirements for KU and Schedule M-2.1-E of
6 Section 16(8)(m) of the Filing Requirements for LG&E. The detailed billing
7 calculations for each rate schedule are shown on Schedule M-2.3 for KU and Schedule
8 M-2.3-E for LG&E. The proposed unit charges for each rate schedule are shown on
9 these schedules.

10

11 **B. ELIMINATION OF ENVIRONMENTAL COST RECOVERY (ECR)**
12 **PROJECTS**

13 **Q. Are the Companies proposing to eliminate certain Environmental Cost Recovery**
14 **(ECR) projects?**

15 A. Yes. KU is proposing to eliminate projects 28 through 31 of the 2009 ECR Plan, all
16 projects in the 2011 ECR Plan, and projects 36 through 38 of the 2016 ECR Plan.
17 LG&E is proposing to eliminate projects 22 and 23 of the 2009 ECR Plan, all projects
18 in the 2011 ECR Plan, and project 28 of the 2016 ECR Plan. Because work will have
19 been completed on these projects prior to the end of the test year (or, in the case of
20 LG&E, Project 22, because the project was cancelled), the Companies are proposing
21 to eliminate them from recovery through the ECR mechanism.

22 **Q. Will the costs of these eliminated ECR projects be recovered through base rates**

1 **instead of the ECR?**

2 A. Yes. The impact of these projects is also shown in Schedule M-2.3 for KU and
3 Schedule M-2.3-E for LG&E and in the supporting detail for those schedules.
4 Specifically, on page 1 of these Schedules, the column labeled “Base Rate ECR
5 Adjustment to Reflect ECR Project Elimination” reflects the amount of base rate ECR
6 revenue transferred to base rate revenue, and the column labeled “ECR Mechanism
7 Adjustment to Reflect ECR Project Elimination” reflects the amount of ECR
8 Mechanism revenue transferred to base rates. These adjustments *do not* alter total
9 revenue, but simply represent the removal of ECR costs for the eliminated projects
10 from the ECR mechanism into base rate recovery. These adjustments are revenue
11 neutral. The supporting details for each rate class are shown on pages 2 through 26
12 of these schedules.

13

14 **C. RESIDENTIAL SERVICE (RATE RS)**

15 **Q. Please provide a brief description of Rate RS.**

16 A. Rate RS is the standard electric rate schedule available to single-family residential
17 service. KU and LG&E serve approximately 442,000 and 377,000 residential
18 customers, respectively, under this rate schedule. Rate RS has a two-part rate structure
19 that includes a Basic Service Charge and an Energy Charge.

20 **Q. What are the charges that KU and LG&E are proposing for Rate RS?**

21 A. KU is proposing a Basic Service Charge of \$0.61 per day, and LG&E is proposing a
22 Basic Service Charge of \$0.52 per day. For KU, the charge would increase from \$0.53

1 to \$0.61, which corresponds to a 15.1% increase. For LG&E, the charge would
2 increase from \$0.45 to \$0.52 per day, which again corresponds to 15.6% increase. For
3 both Companies, the Basic Service Charges were designed to reflect 75% of the
4 customer-related costs calculated in the cost of service studies.¹ The customer-related
5 cost for KU is \$0.82 per day; thus, KU's proposed Basic Service Charge of \$0.61 per
6 day represents 75% of the customer cost from the cost of service study ($\$0.61 \div \0.82
7 $= 75\%$). The customer-related cost for LG&E is \$0.69 per day; therefore, LG&E's
8 proposed Basic Service Charge of \$0.52 also represents 75% of the customer cost
9 ($\$0.52 \div \$0.69 = 75\%$). Although higher Basic Service Charges could be supported
10 based on results of the Companies' cost of service studies, the increase was capped at
11 75% of customer costs to reflect the ratemaking principles of rate continuity and
12 gradualism. KU is proposing to increase its energy charge from \$0.08963 per kWh to
13 \$0.09950 per kWh. LG&E is proposing to increase its energy charge from \$0.09278
14 per kWh to \$0.10482 per kWh.

15 **Q. Are the Companies proposing to continue to separate the energy charge into a**
16 **variable cost component and a fixed cost component?**

17 A. Yes. In its Orders in Case Nos. 2018-00294 and 2018-00295, the Commission ruled
18 that splitting the energy charges into variable cost component (Variable Energy
19 Charge) and fixed cost component (Infrastructure Energy Charge) for informational

¹ In its Oder in Case No.2018-00295, the Commission required that the Basic Service Charge for both KU and LG&E represent the same percentage of the customer-related costs from the Companies' cost of service studies. See Case No. 2018-00295, Order at 25 (Ky. P.S.C. April 30, 2019). The Companies' proposal in the current proceedings is consistent with that directive.

1 purposes is reasonable. For KU, the proposed Variable Energy Charge is \$0.03200
2 per kWh, and the proposed Infrastructure Energy Charge is \$0.06750 per kWh. For
3 LG&E, the proposed Variable Energy Charge is \$0.03245 per kWh, and the proposed
4 Infrastructure Energy Charge is \$0.07237 per kWh.

5 **Q. Why do the Companies separate their energy charges into variable and fixed**
6 **components?**

7 A. The purpose of showing the energy charge as consisting of both a variable cost
8 component and a fixed cost component is solely educational and informational. The
9 Companies want customers, stakeholders and employees to be aware that two types
10 of costs are included in the energy charge for Rate RS and other rates that have a two-
11 part rate structure consisting of a Basic Service Charge and an Energy Charge. The
12 energy cost component consists of costs that vary directly with the kWh usage of
13 customers, such as fuel expenses and variable operation and maintenance expenses.
14 The fixed cost component consists of demand-related costs that do not vary directly
15 with energy usage, such as depreciation expenses, return, taxes, and fixed operation
16 and maintenance expenses related to utility infrastructure. It is important for
17 customers, stakeholders, and employees to understand that not all costs are
18 automatically reduced when customers use less energy. For example, the fixed costs
19 associated with poles, transformers, conductors, power plants, office buildings, etc.,
20 are not automatically reduced when consumers reduce their energy usage. As greater
21 emphasis is placed on distributed generation, energy conservation and other new
22 technologies such as electric vehicles, it is important for customers, stakeholders and

1 employees to understand the distinction between fixed and variable costs.

2 **Q. What is the breakdown of total costs among these three cost components for Rate**
3 **RS?**

4 A. The following table (TABLE 1) shows how the cost of providing service to customers
5 under Rate RS is broken down between customer-related fixed costs, demand-related
6 fixed costs, and energy-related variable costs for KU and LG&E:

7

8

TABLE 1

| Cost Component | KU Percentage of Cost | LG&E Percentage of Cost |
|---|----------------------------------|--|
| Customer-Related Fixed Costs | 19.41% | 19.74% |
| Demand-Related Fixed Costs (Infrastructure Demand Costs) | 52.61% | 53.18% |
| Energy-Related Variable Costs | 27.98% | 27.08% |

9

10 **Q. How are these costs currently recovered from Rate RS customers?**

11 A. Rate RS, as well as a number of the Companies' other rate schedules that serve smaller
12 commercial and industrial customers (for example Rate GS), are currently structured
13 as a *two-part rate* consisting of a customer charge (Basic Service Charge) and an
14 Energy Charge. The Basic Service Charge is billed as a flat daily charge per customer,
15 and the Energy Charge is billed on a cents-per-kWh basis. Under a two-part rate
16 design, all *three cost components* (customer costs, demand costs and energy costs) are

1 recovered through *two rate components* (customer charge and energy charge). Unlike
2 the three- and multi-part rates that are used for larger customers, the two-part rate for
3 Rate RS does not utilize a demand charge. Therefore, demand costs (costs associated
4 with transformers, overhead and underground conductor, transmission lines, and
5 generation capacity) must be recovered through either the customer charge or an
6 energy charge. For Rate RS, all demand costs and a portion of the customer costs are
7 currently being recovered through the Energy Charge, which includes the
8 Infrastructure Energy Charge and the Variable Energy Charge. The following tables
9 compare the percentage of costs broken down by component (customer cost, demand
10 cost, and energy cost) to the percentage of recovery through the proposed rate
11 components (customer charge and energy charge) for KU (TABLE 2) and LG&E
12 (TABLE 3):

13
14 **TABLE 2 – KU**

| Component | Percentage of Cost | Rate Design |
|------------------|---------------------------|--------------------|
| Customer | 19.41% | 14.5% |
| Demand | 52.61% | 0.0% |
| Energy | 27.98% | 85.5% |

15

16

1

TABLE 3 – LG&E

| Component | Percentage of Cost | Rate Design |
|------------------|---------------------------|--------------------|
| Customer | 19.74% | 14.8% |
| Demand | 53.18% | 0.0% |
| Energy | 27.08% | 85.2% |

2

3

4

As can be seen from these tables, all demand costs and a significant portion of customer costs are currently recovered through the Energy Charge.

5

6 **Q.**

What are three- and multi-part rate designs?

7 **A.**

A three-part rate is a rate structure that includes a customer charge, energy charge and demand charge. KU and LG&E's rate for medium commercial and industrial customers (Rate PS) is a three-part rate consisting of a customer charge, energy charge and demand charge. The rates for large commercial and industrial customers (Rates TODS, TODP, RTS, and FLS) are structured as a *multi-part rate* consisting of a customer charge, energy charge and multi-part demand charge that is unbundled between production fixed cost components and transmission/distribution fixed cost components. The reason that a two-part rate structure traditionally has been used in the industry for residential and small commercial and industrial accounts is that the cost of the metering technology necessary to bill a three- or multi-part rate for small

16

1 customers has been prohibitive. In my experience, this is changing in the industry.
2 As utilities install advanced metering technology for all types of customers, it becomes
3 more feasible to use three- or multi-part rates for residential and general service (small
4 commercial and industrial) customers and thereby offer rates that more accurately
5 reflect cost of service. Multi-part rates allow customers to better manage their load by
6 shifting their usage pattern to avoid higher peak period charges. Several utilities in
7 the U.S. have implemented three- and multi-part rates for residential and small general
8 service customers. This is a trend in the industry that I believe the Companies and
9 the Commission should closely monitor.

10 **Q. Does recovering fixed customer and demand costs through a variable energy**
11 **charge create problems?**

12 A. Yes, it certainly does. The Companies must install generation, transmission and
13 distribution infrastructure to serve customers. The costs associated with this
14 infrastructure are fixed. As explained earlier, some of these fixed costs are demand-
15 related and are thus related to utility infrastructure that is sized to meet maximum loads
16 that customers place on the system while other fixed costs are customer-related and
17 are thus related to the number of customers that the utility serves. These fixed costs
18 typically will not change if a customer uses more energy or if a customer uses less
19 energy. For example, once KU or LG&E installs a distribution line, transformer,
20 service line, and meter to serve a customer, the operation and maintenance expenses,
21 depreciation expenses, property taxes, interest expenses, and other such costs are not
22 decreased if a customer uses less energy. Once the facilities are installed, they are

1 invariant to customer usage and are therefore fixed. If the costs are recovered through
2 a volumetric charge rather than a fixed charge, then when a customer uses less energy
3 these fixed costs will not be recovered from the customer, and those costs must be
4 recovered from other customers. This is particularly problematic if a customer reduces
5 energy consumption by installing distributed generation technology such as solar
6 panels or a wind turbine but falls back on the utility when sunlight is unavailable or
7 when the wind isn't blowing. In those instances, the customer will have reduced its
8 energy usage with distributed generation but will still require the same generation,
9 transmission and distribution capacity to meet its demand requirements. The customer
10 will have reduced the billing of fixed costs collected through the energy charge but
11 will not have caused the utility to reduce its fixed costs. In those instances, the fixed
12 costs are thus shifted to customers who have *not* installed distributed generation
13 technology.

14 **Q. What is the basis for the proposed increase in the Basic Service Charge for Rate**
15 **RS?**

16 A. The Companies are proposing a Basic Service Charge that moves the charge towards
17 the customer-related costs from the Companies' cost of service studies. As will be
18 explained in greater detail in the portion of my testimony dealing with the electric cost
19 of service study, the methodology that is used to classify costs as customer related
20 corresponds to the methodology that has been accepted by the Commission in the past.
21 The methodology for classifying costs as customer-related also corresponds to one of
22 the standard methodologies set forth in the *Electric Utility Cost Allocation Manual*

1 published by the National Association of Utility Regulatory Commissioners
2 (NARUC).

3 **Q. Have you prepared an exhibit showing the calculation of the cost components for**
4 **Rate RS?**

5 A. Yes. Exhibit WSS-2 shows the calculation of the unit customer cost, demand related
6 cost, and energy costs from the Companies' cost of service studies. From this
7 calculation, the customer cost for KU is \$0.82 per customer per day; the demand-
8 related cost (infrastructure cost) is \$0.06017/kWh; and the energy cost (variable cost)
9 is \$0.03200/kWh. KU is proposing to increase the Basic Service Charge from \$0.53
10 per day to \$0.61 per day, which corresponds to a 15.1% increase in the charge. KU's
11 proposed Basic Service Charge of \$0.61 per day is 75% of the unit cost from KU's
12 cost of service study.

13 The customer cost for LG&E is \$0.69 per customer per day; the demand-
14 related cost is \$0.06371/kWh; and the energy cost is \$0.03245/kWh. LG&E is
15 proposing to increase the Basic Service Charge from \$0.45 per day to \$0.52 per day,
16 which corresponds to a 15.6% increase in the charge. LG&E's proposed Basic Service
17 Charge of \$0.52 is 75% of the unit cost from LG&E's cost of service study. The
18 Companies are proposing Basic Service Charges for Rate RS that reflect only 75% of
19 customer costs, which correspond to percentage increases in the Basic Service
20 Charges of less than 16%, to reflect the ratemaking principles of rate continuity and
21 gradualism. It should be noted, however, that in the last several years the Commission
22 has allowed a number of utilities to increase their customer charges by close to 50%.

1 For example, in its Order in Case No. 2019-00066, the Commission authorized a 46%
2 increase in Jackson Energy Cooperative Corporation's residential customer charge
3 increasing the customer charge from \$16.44 to \$24.00 per month.²

4 **Q. Please describe the type of costs that are recovered through the Basic Service**
5 **Charge.**

6 A. Customer costs include costs related to the minimum system that each customer must
7 have in place to access the electric grid. Customer costs also include the cost of
8 operating and maintaining this minimum system as well as other costs not related to
9 customer usage, such as meter reading, billing and customer service costs. The
10 minimum system comprises the meter, service drop from the transformer, the
11 transformer, the minimum size of wire, and poles extending to the distribution
12 substation that are necessary to provide a customer with access to the electric grid.
13 Once the cost of this minimum system is determined using the zero-intercept
14 methodology (discussed later in my testimony), it can be allocated to each customer.

15 **Q. What other costs need to be considered in developing the Basic Service Charge?**

16 A. Customers often need more equipment than the minimum system in order to receive
17 adequate service. The cost of this equipment above the minimum is related to the
18 customer's usage level and is a demand-related fixed cost that is recovered through
19 either a demand or energy charge. A cost of service study is performed for the purpose
20 of allocating costs as accurately as possible based on cost causation. In a cost of

² *Electronic Application of Jackson Energy Cooperative Corporation for a General Adjustment in Existing Rates*, Case No. 2019-00066, Order at 8 (Ky. P.S.C. June 19, 2019).

1 service study, it is important to distinguish the distribution system costs related to
2 demand from the distribution system costs that are related to the minimum system that
3 are not related to demand, as discussed in the NARUC *Electric Utility Cost Allocation*
4 *Manual*. As discussed earlier, the Companies must install the minimum amount of
5 equipment to provide customers with access to the electric grid. This minimum
6 amount of equipment is not related to the volume of electricity used by the customer,
7 and each customer must have that minimum amount of equipment in place to obtain
8 electric service. These non-volumetric fixed distribution costs are associated with
9 serving the customer and therefore should be borne by the customer through a fixed
10 customer charge regardless of usage. The remainder of the distribution costs, which
11 are related to installed capacity, are classified as demand-related and are collected
12 through a kWh energy charge for Rate RS or through a kW or kVA charge for
13 customer classes billed under a three- or multi-part rate that has a demand charge.
14 This split of distribution system costs between volumetric and fixed assures that
15 customers only have to pay for what they are actually using, namely the basic
16 minimum system that all customers require plus as much additional equipment as
17 required to meet their needs.

18 **Q. Will the Companies' proposed Basic Service Charges recover all of KU and**
19 **LG&E's customer-related costs for Rate RS?**

20 A. No. KU's proposed Basic Service Charge of \$0.61 per day does not recover all of the
21 customer-related fixed costs of \$0.82 per day. Likewise, LG&E's proposed Basic
22 Service Charge of \$0.52 per day does not fully recover the customer-related fixed costs

1 of \$0.69 per day. The differences between the proposed Basic Service Charge and
2 customer-related fixed costs will therefore be recovered in the energy charge.

3 **Q. Will the Companies' proposed residential rates help to reduce subsidies?**

4 A. Yes. There are two types of subsidies that need to be considered – inter-class subsidies
5 and intra-class subsidies. The term “*inter-class subsidies*” refers to subsidies that are
6 provided from or to one class of customers to or from another class of customers, and the
7 “*intra-class subsidies*” refers to subsidies that are provided from or to customers within
8 the same rate class. The Companies' proposed rates are designed to make progress
9 towards reducing both *inter-* and *intra-class* rate subsidies. The apportionment of the
10 total revenue increase to the customers was developed in such a manner as to provide a
11 reduction in *inter-class subsidies*.

12 The rate making principle to follow to avoid *intra-class subsidies* is that fixed
13 costs should be recovered through fixed charges (such as the customer charge and
14 demand charge), and variable costs should be recovered through variable charges (such
15 as the energy charge and the fuel adjustment charge). If fixed costs are recovered through
16 variable charges, such as the energy charge assessed on a kWh basis, each kWh contains
17 a component of fixed costs and customers using more energy than the average customer
18 in the class are paying more than their fair share of the utility's fixed costs while
19 customers using less energy than the average customer in the class are paying less than
20 their fair share of the utility's fixed costs. These fixed costs should be collected through
21 the billing units associated with the appropriate cost driver, and energy usage clearly is
22 not the correct cost driver for collecting fixed costs.

1 The collection of fixed costs through the energy charge typically results in
2 customers with above-average usage subsidizing customers with below-average usage.
3 In order to eliminate this source of intra-class subsidies, the Companies propose a rate
4 design that more closely follows the ratemaking principle of recovering fixed costs
5 through fixed charges and variable costs through variable charges than does their current
6 rate design.

7 Increasing the Basic Service Charge by a larger percentage than the energy
8 charge will help reduce subsidies by bringing the charges toward the actual cost of
9 providing service. Increasing KU's Basic Service Charge from \$0.53 per day to \$0.61
10 per day and increasing LG&E's Basic Service Charge from \$0.45 per day to \$0.52 per
11 day will eliminate some, but not all, of the subsidies that high-usage customers are
12 currently providing low-usage customers.

13

14 **D. RESIDENTIAL TIME-OF-DAY ENERGY AND DEMAND SERVICES**

15 **Q. Please provide a brief description of the Companies' residential time-of-day**
16 **rates.**

17 A. The Companies offer two residential time-of-day rates, RTOD-Energy and RTOD-
18 Demand. Rate RTOD-Energy is a time-of-day rate that includes a time differentiated
19 energy charge. Under the rate, customers are charged a significantly lower energy
20 charge for off-peak usage. Rate RTOD-Demand is a time-of-day rate that includes a
21 flat energy charge but a time differentiated demand charge.

22 **Q. Are the Companies proposing changes to the time-of-day periods (rating periods)**

1 **for their RTOD rates?**

2 A. Yes. The Companies are proposing to modify the on-peak period during the months
3 of November through March (“Winter Months”) for both RTOD-Energy and RTOD-
4 Demand. The on-peak period during the Winter Months are currently 7 AM to 11
5 AM. KU and LG&E are proposing to redefine the on-peak period during the Winter
6 Months as the hours between from 6 AM to 10 AM and from 6 PM to 10 PM. With
7 this change, the morning on-peak period will be shifted by one hour earlier in the
8 morning, and non-contiguous evening hours will be added to the on-peak period to
9 capture a secondary daily peak that occurs on the combined KU and LG&E system
10 during the evening.

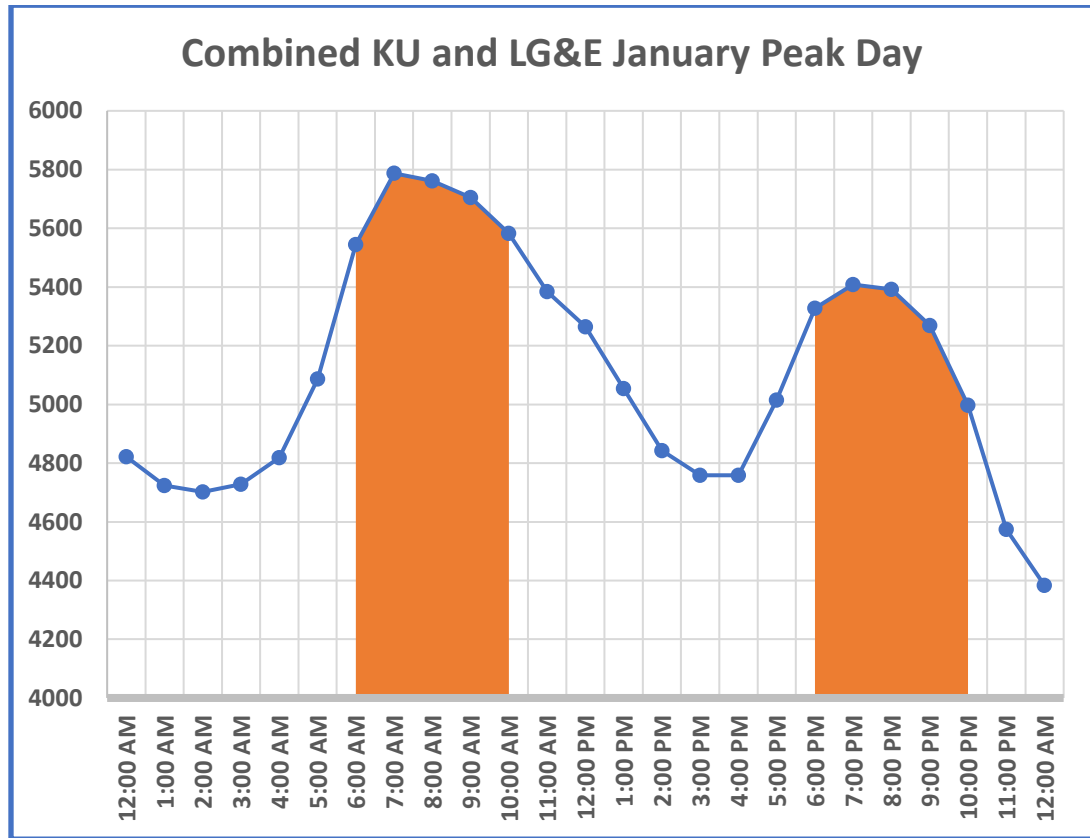
11 **Q. Why are these changes to the on-peak period being made?**

12 A. The new on-peak hours will more accurately reflect the hours when a peak on the
13 combined KU and LG&E system would likely occur during the Winter Months.
14 Because the Companies plan their generation resources to meet their combined load,
15 it is appropriate to define the peak period as the hours during which the combined
16 system peak would likely occur. Another objective is to define the peak period as
17 narrowly as practicable so that customers can manage their loads to avoid higher on-
18 peak charges, while still reflecting the period during which the Companies’ peak will
19 likely occur. During the Winter Months, the Companies’ hourly combined system
20 load will exhibit a pronounced peak during the morning and another during the
21 evening. In the industry, this is referred to vernacularly as a “double hump”, and is

1 illustrated in the following graph (GRAPH 1) showing the hourly expected load in
2 MW for a January peak:

3
4

GRAPH 1



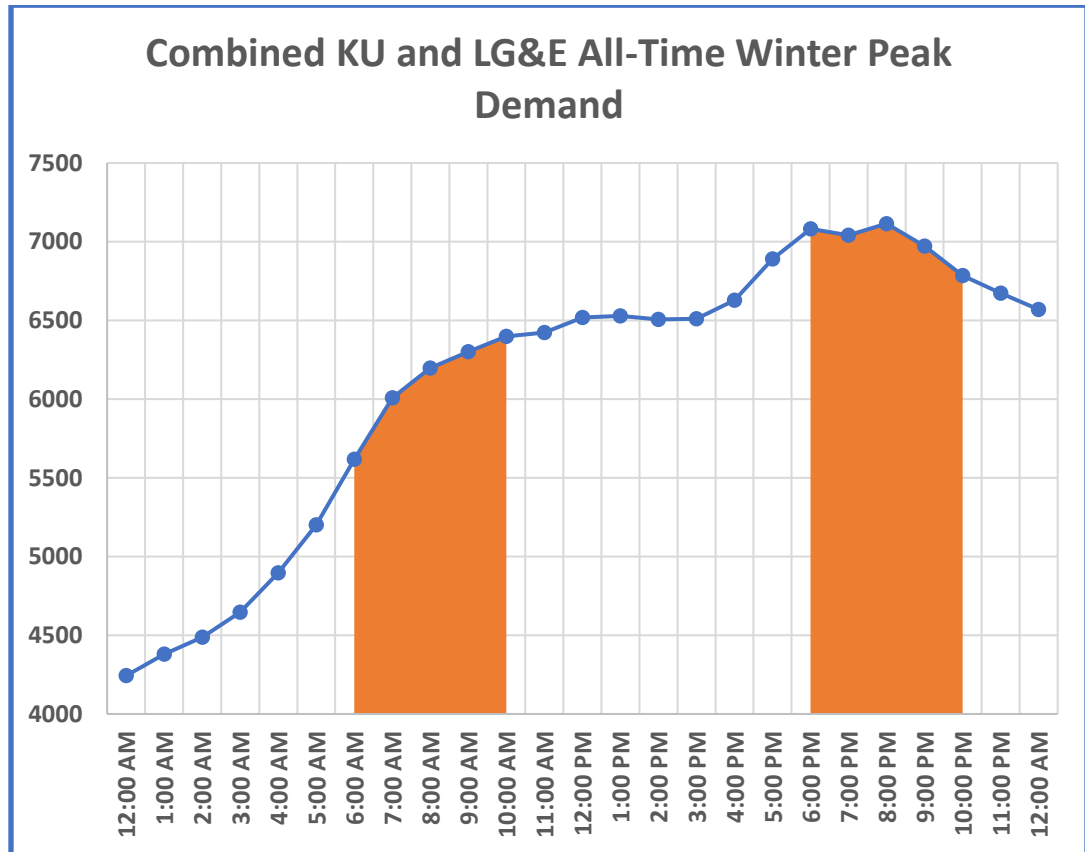
5
6

7 This graph shows the typical hourly load pattern for KU and LG&E's combined
8 system on a winter peak day, with the evening peak somewhat lower than the morning
9 peak. While the peak during the Winter Months will typically occur during the
10 morning hours, the Companies' all-time winter peak occurred during the evening.

1 GRAPH 2 shows the hourly loads in MW for the Companies' all-time highest winter
2 peak that occurred on January 6, 2014:

3
4

GRAPH 2



5
6

7 As seen in the graph, the Companies proposed on-peak period would encompass this
8 all-time winter system peak.

9 **Q. What charges are KU and LG&E proposing for Rate RTOD-Energy?**

10 A. KU is proposing to increase the Basic Service Charge from \$0.53 per day to \$0.61 per

1 day, to increase the off-peak Energy Charge from \$0.05760 per kWh to \$0.06512 per
2 kWh, and to decrease the on-peak Energy Charge from \$0.27542 per kWh to \$0.22124
3 per kWh. LG&E is proposing to increase the Basic Service Charge from \$0.45 per
4 day to \$0.52 per day, to increase the off-peak Energy Charge from \$0.07080 per kWh
5 to \$0.08180 per kWh, and to decrease the on-peak Energy Charge from \$0.20508 per
6 kWh to \$0.17949 per kWh. The proposed Basic Service Charges for the Companies
7 are the same as for Rate RS. The increases in the off-peak Energy Charges and
8 decreases in the on-peak Energy Charges account for proposed changes to the off-
9 peak and on-peak hours during the Winter Months described above.

10 **Q. What charges are KU and LG&E proposing for Rate RTOD-Demand?**

11 A. KU is proposing a Basic Service Charge of \$0.61 per day, an Energy Charge of
12 \$0.04476 per kWh, a Base Demand charge of \$4.01 per kW, and a Peak Demand
13 charge of \$10.37 per kW. LG&E is proposing a Basic Service Charge of \$0.52 per
14 day, an Energy Charge of \$0.05340 per kWh, a Base Demand charge of \$4.22 per kW,
15 and a Peak Demand charge of \$9.25 per kW. The energy charge for Rate RTOD-
16 Demand is broken down into Variable Energy Charge and Infrastructure Energy
17 Charge components.

18

19 **E. GENERAL SERVICE (RATE GS)**

20 **Q. Please provide a brief description of Rate GS.**

21 A. Rate GS is the standard electric rate schedule available to small commercial and
22 industrial customers served at secondary voltages (available voltages *less than*

1 2,400/4,160Y volts). The rate schedule is limited to customers whose 12-month
2 average monthly demands do not exceed 50 kW. Approximately 83,000 small
3 commercial and industrial customers are served under Rate GS on KU and
4 approximately 45,000 are served under Rate GS on LG&E. Rate GS has a two-part
5 rate structure that includes a Basic Service Charge and an Energy Charge.

6 **Q. What charges are the Companies proposing for Rate GS?**

7 A. KU is proposing an increase in the Basic Service Charge for Rate GS from \$1.04 per
8 day to \$1.35 per day for single-phase service and from \$1.66 per day to \$2.15 per day
9 for three-phase service. LG&E is proposing an increase in the Basic Service Charge
10 for Rate GS from \$1.04 per day to \$1.16 per day for single-phase service and from
11 \$1.66 per day to \$1.85 per day for three-phase service. KU is proposing to increase
12 the energy charge from \$0.11225 per kWh to \$0.12469 per kWh, and LG&E is
13 proposing to increase the energy charge from \$0.10530 per kWh to \$0.12355 per kWh.
14 As with Rate RS, the energy charge for Rate GS is broken down into Variable Energy
15 Charge and Infrastructure Energy Charge components. For KU the proposed Variable
16 Energy Charge is \$0.03253 per kWh, and the proposed Infrastructure Energy Charge
17 is \$0.09216 per kWh. For LG&E the proposed Variable Energy Charge is \$0.03340
18 per kWh, and the proposed Infrastructure Energy Charge is \$0.09015 per kWh.

19

20 **F. GENERAL TIME-OF-DAY SERVICE (RATE GTOD)**

21 **Q. Are the Companies proposing a General Time-of-Day service?**

22 A. Yes. The Companies are proposing to offer optional General Time-of-Day Service

1 (Rate GTOD-Energy and GTOD-Demand) standard rates that would be available to
2 any General Service (Rate GS) customer enrolled under the Advanced Metering
3 Systems Customer Service Offering set forth in the Companies' Demand-Side
4 Management Cost Recovery Mechanism. Currently there are approximately 460 KU
5 and LG&E customers enrolled under the Advanced Metering Systems Customer
6 Service Offering that would be eligible to take service under Rate GTOD-Energy or
7 GTOD-Demand.

8 **Q. Please describe the rate structure for Rate GTOD-Energy.**

9 A. Rate GTOD-Energy will have the same pricing structure as RTOD-Energy.
10 Specifically, GTOD-Energy will consist of a Basic Service Charge and a time-
11 differentiated Energy Charge consisting of an Off-Peak Charge and an On-Peak
12 Charge. During the Summer Months of April through October, the On-Peak will be
13 1:00 PM to 5:00 PM on weekdays, with all other hours considered Off-Peak. During
14 the Non-Summer Months of November through March, the On-Peak will be 6 AM to
15 10 AM in the morning and 6 PM to 10 PM in the evening, with all other hours
16 considered Off-Peak.

17 **Q. What charges are KU and LG&E proposing for GTOD-Energy?**

18 A. KU is proposing a Basic Service Charge \$1.35 per day for single-phase service and
19 \$2.15 per day for three-phase service. KU is proposing an off-peak Energy Charge of
20 \$0.08094 per kWh and an on-peak Energy Charge of \$0.30029 per kWh. LG&E is
21 proposing a Basic Service Charge \$1.16 per day for single-phase service and \$1.85
22 per day for three-phase service. LG&E is proposing an off-peak Energy Charge of

1 \$0.08075 per kWh and an on-peak Energy Charge of \$0.24797 per kWh.

2 **Q. Please describe the rate structure for Rate GTOD-Demand.**

3 A. Rate GTOD-Demand will have the same pricing structure as RTOD-Demand.
4 Specifically, GTOD-Demand will consist of a Basic Service Charge, Energy Charge,
5 Peak Demand Charge, and Base Demand Charge. During the Summer Months of
6 April through October, the On-Peak will be 1:00 PM to 5:00 PM on weekdays, with
7 all other hours considered Off-Peak. During the Non-Summer Months of November
8 through March, the On-Peak will be 6 AM to 10 AM in the morning and 6 PM to 10
9 PM in the evening, with all other hours considered Off-Peak.

10 **Q. What charges are KU and LG&E proposing for GTOD-Demand?**

11 A. KU is proposing a Basic Service Charge of \$1.35 per day for single-phase service and
12 \$2.15 per day for three-phase service. KU is proposing an Energy Charge of \$0.06916
13 per kWh, Peak Demand Charge of \$14.16 per kW per month, and Base Demand
14 Charge of \$5.47 per kW per month. LG&E is proposing a Basic Service Charge \$1.16
15 per day for single-phase service and \$1.85 per day for three-phase service. LG&E is
16 proposing an Energy Charge of \$0.05950 per kWh, Peak Demand Charge of \$11.75
17 per kW per month, and Base Demand Charge of \$5.37 per kW per month. Exhibit
18 WSS-3 shows the cost support for the charges.

19

20 **G. ALL ELECTRIC SCHOOLS SERVICE (AES) (KU ONLY)**

21 **Q. Please provide a brief description of Rate AES.**

22 A. Rate AES is a KU-only rate generally available for school buildings, although the rate

1 is closed to new customers and is limited to customers that were qualified for, and
2 being served on, Rate AES as of July 1, 2011. There are approximately 420 schools
3 taking service under Rate AES. KU is proposing to increase the energy charge from
4 \$0.08732 per kWh to \$0.10079 per kWh. The energy charge for Rate AES is broken
5 down into Variable Energy Charge and Infrastructure Energy Charge components.
6 The proposed Variable Energy Charge is \$0.03223 per kWh, and the proposed
7 Infrastructure Energy Charge is \$0.06856 per kWh.

8

9 **H. POWER SERVICE (RATE PS)**

10 **Q. What charges are the Companies proposing for Rate PS?**

11 A. Rate PS is available for large commercial and industrial customers served at secondary
12 voltages (available voltages less than 2,400/4,160Y volts) whose 12-month average
13 loads exceed 50 kW but do not exceed 250 kW and for large commercial and industrial
14 customers served at primary voltages (2,400/4,160Y volts, 7,200/12,470Y volts, or
15 34,500 volts) whose 12-month average do not exceed 250 kW. The rate changes
16 proposed for Rate PS are shown on Schedule M-2.3 for KU and Schedule M-2.3-E for
17 LG&E.

18

19 **I. LARGE CUSTOMER RATES (RATES TODS, TODP, RTS, FLS)**

20 **Q. What are the standard large customer rates offered by KU and LG&E?**

21 A. KU and LG&E offer four standard rates for large commercial and industrial
22 customers: Time-of-Day Secondary Service (Rate TODS), Time-of-Day Primary

1 Service (Rate TODP), Retail Transmission Service (Rate RTS), and Fluctuating Load
2 Service (Rate FLS). Rate TODS is available to customers served at secondary
3 voltages (available voltages less than 2,400/4,160Y volts) with average demands
4 between 250 kW and 5,000 kW. Rate TODP is available to customers served at
5 primary voltages (2,400/4,160Y volts, 7,200/12,470Y volts, or 34,500 volts) with
6 average demands greater than 250 kVA. Rate RTS is available to customers served at
7 transmission voltages (69,000 volts or higher) with average demands greater than 250
8 kVA. Rate FLS is available to customers served at primary or transmission voltage
9 whose demands are 20,000 kW or greater. Customers with demands of 20,000 kW or
10 greater whose load either increases or decreases 20 MVA or more per minute or whose
11 load either increases or decreases 70 MVA or more in ten minutes, when any such
12 increases or decreases occur more than once during any hour of the month, are
13 required to take service under Rate FLS. The Companies' largest customers are served
14 under these rate schedules. For KU, the proposed charges for Rates TODS, TODP,
15 RTS, and FLS are shown on pages 9, 10, 11, and 12, respectively, of Schedule M-2.3
16 of KU's Filing Requirements. For LG&E, the proposed charges for Rates TODS,
17 TODP, RTS, and FLS are shown on pages 8, 9, 10, and 11, respectively, of Schedule
18 M-2.3-E of LG&E's Filing Requirements.

19 **Q. Do all of these rate schedules have the same basic rate structure?**

20 A. Yes. All four of these rates have a rate structure consisting of a Basic Service Charge,
21 an Energy Charge, and a Maximum Load Charge comprising a Peak Demand Charge,
22 an Intermediate Demand Charge, and a Base Demand Charge. The demand charges

1 for these rates are billed based on a charge per kVA. The Peak Demand Charge applies
2 to billing demands (maximum demands) that occur during the weekday hours (“Peak
3 Demand Period”) from 1:00 PM to 7:00 PM during the summer months of May
4 through September (“summer peak months”) and during the weekday hours from 6:00
5 AM to 12:00 Noon during winter months of October through April (“winter peak
6 months”). The Intermediate Demand Charge applies to billing demands that occur
7 during the weekday hours (“Intermediate Demand Period”) from 10:00 AM to 10:00
8 PM during the summer peak months and from 6:00 AM to 10:00 PM during the winter
9 peak months. The Base Demand Charge applies to the billing demands that occur at
10 any time during the month.

11 **Q. Is there a cost basis for this rate structure?**

12 A. Yes. The Companies must install sufficient generation resources to meet their peak
13 demands. Peak demand conditions occur during the summer peak months and the
14 winter peak months. Furthermore, peak conditions occur during hours between 6:00
15 AM and 10:00 PM but vary by season. The Companies must also install sufficient
16 transmission and distribution facilities to deliver power to individual customers
17 regardless of when they need it – during the peak or intermediate period or otherwise.
18 Over the years, the Companies have structured the Peak Demand Charge and the
19 Intermediate Demand Charge so that these charges would essentially provide recovery
20 of generation fixed costs. The Base Demand Charge was structured so that the charge
21 would basically provide recovery of transmission and distribution demand-related
22 costs. Therefore, the Maximum Load Charge is essentially unbundled between

1 generation fixed costs, which are recovered through the Peak and Intermediate
2 Demand Charges, and transmission and distribution demand-related fixed costs, which
3 are recovered through the Base Demand Charge.

4 **Q. Are the Companies proposing any changes to the pricing structure of these**
5 **rates?**

6 A. No.

7

8 **J. CURTAILABLE SERVICE RIDERS (CSR)**

9 **Q. Please describe the Companies' CSR schedules.**

10 A. The Companies' CSR schedules provide credits to industrial or commercial customers
11 who have agreed to interrupt a portion of their load when called upon by KU or LG&E.
12 Curtailable customers receive a discount in the form of a credit to their demand
13 charges in exchange for their willingness to receive curtailable service on a designated
14 portion of their load. KU and LG&E have two CSR schedules: Curtailable Service
15 Rider-1 (Rider CSR-1) and Curtailable Service-2 (Rider CSR-2). The Companies'
16 CSR schedules are now all closed to new participation.

17 **Q. Are KU and LG&E proposing changes to the CSR schedules?**

18 A. No, other than a change to the LG&E CSR schedules to indicate that they are now
19 closed to new participation. Specifically, the Companies are not proposing to change
20 the CSR credits.

21

1 **K. OUTDOOR SPORTS LIGHTING SERVICE (OSL)**

2 **Q. Please describe OSL.**

3 A. OSL is a pilot rate introduced in the Stipulation and Recommendation in the
4 Companies' 2016 rate case proceedings. The pilot rate is limited to 20 customers each
5 for KU and LG&E on a first-come-first-served basis. The rate affords customers with
6 lighting for outdoor sports fields to realize savings by operating their lighting
7 equipment during off-peak hours. The rate consists of a Basic Service Charge, Energy
8 Charge, and Base and Peak Demand Charges. KU currently serves four OSL-
9 Secondary customers, and LG&E currently serves one OSL-Secondary customer. No
10 customers take service under OSL-Primary.

11 **Q. Are the Companies proposing to retain OSL?**

12 A. Yes. The Companies are proposing to retain the rate schedule as a pilot program. By
13 allowing sports fields the opportunity to avoid the Companies' system peaks and
14 thereby avoid costs, the rate schedule appears to be operating effectively.
15 Furthermore, the Companies' cost of service studies do not indicate that OSL is being
16 subsidized by other customer classes. Therefore, the Companies propose to continue
17 the rate as a pilot program. Because there are fewer than 20 customers currently
18 taking service under OSL, the Companies propose to leave the maximum number of
19 customers under the schedules at the current level of 20 customers on each system.

20 **Q. Are the Companies proposing to adjust the Peak Period for the Summer Months**
21 **for OSL?**

22 A. Yes. To accommodate the management of sports lighting loads in late September, the

1 Companies are proposing to reduce the Peak Period during the summer peak months
2 by one hour from the current peak hours of 1 PM – 7 PM to 1 PM – 6 PM.

3 **Q. Are the Companies proposing to adjust the charges for OSL?**

4 A. Yes. For OSL-Secondary, KU is proposing to decrease the energy charge from
5 \$0.03249 to \$0.03210 per kWh, to decrease the Peak Demand Charge from \$24.17 to
6 \$19.61 per kW and increase the Base Demand Charge from \$2.02 to \$2.93 per KW.
7 These changes result in a net *decrease* in revenue for this rate of approximately 5.0%
8 for KU. LG&E is proposing to decrease the energy charge for OSL-Secondary from
9 \$0.03441 to \$0.03292 per kWh, to decrease the Peak Demand Charge from \$26.57 to
10 \$23.14 per kW and decrease the Base Demand Charge from \$3.44 to \$3.38 per KW.
11 These changes result in a net *decrease* in revenue for this rate of approximately 10.0%
12 for LG&E. The detailed rate changes for OSL are shown on pages 16 and 17 of
13 Schedule M-2.3 for KU and Schedule M-2.3-E for LG&E.

14

15 **L. LIGHTING RATES**

16 **Q. Please provide an overview of the lighting rates currently offered by KU and**
17 **LG&E.**

18 A. KU and LG&E offer two rates that include the lighting fixture along with the delivered
19 energy to operate the lights. Those two rates are Lighting Service (Rate LS) and
20 Restricted Lighting Service (Rate RLS). Under Rates LS and RLS, the rates include
21 the lighting fixtures along with the delivered energy to operate the lighting fixtures.
22 Under these two rates, the lights can be fed by either overhead or underground service.

1 For lights fed from underground service, the cost of a non-wood pole is currently
2 included in the rate. For lights fed from overhead service, the fixture is typically
3 attached to an existing pole; therefore, the cost of the pole is not included in the rate.
4 However, if a wood pole must be installed to provide service for an overhead light,
5 then the customer would pay a separate monthly fee for that pole. KU and LG&E also
6 offer two types of delivered energy service to customers who own their lighting
7 fixtures or traffic signal and control equipment. Those two rates are Lighting Energy
8 Service (Rate LE) and Traffic Energy Service (Rate TE).

9 **Q. Please provide an overview of the proposed modifications to Rates LS and RLS.**

10 A. In their 2016 and 2018 rate cases, KU and LG&E each introduced a number of light-
11 emitting diode (LED) offerings. In the current rate case, KU is offering a new
12 Victorian style LED offering, and LG&E is offering a new Victorian and a new
13 London style LED offering. Under the proposed tariffs, the Companies will no
14 longer be installing new non-LED lights. Accordingly, all non-LED lights would be
15 moved from Rate LS to Rate RLS and thus be restricted. The Companies will
16 continue to maintain the existing non-LED lights. However, if a non-LED fixture fails
17 and the Companies no longer have replacement equipment in inventory to repair or
18 replace the fixture, then the customer will be given a choice to have the light removed
19 or to replace the non-LED light with an LED light. KU and LG&E will also continue
20 to allow customers, at their option, to replace non-LED lights that are functioning (i.e.,
21 in good working order) with LED lights, but in those instances the customer would
22 pay an LED Conversion Fee, as approved by the Commission in Case Nos. 2018-

1 00294 and 2018-00295.

2 **Q. How were the charges for the LED fixtures determined?**

3 A. For overhead lights, the proposed charge reflects the current cost to the Companies of
4 the LED fixture, photocell and associated equipment (service wire, connectors, etc.),
5 labor required for installation, and expected maintenance of the fixture. For
6 underground lights, the Companies are proposing to break out the charges into a
7 fixture charge and a pole charge. The fixture charge consists of the costs to the
8 Companies of an LED fixture, photocell, labor required for installation, and expected
9 maintenance of the fixture. Included in the pole charge is the cost to the Companies
10 of the pole and associated equipment (base, connectors, etc.), labor to install the pole,
11 and expected maintenance of the pole. The proposed charges for both underground
12 and overhead fixtures are determined by calculating the monthly costs of the various
13 types of fixtures using a standard carrying cost methodology that is consistent with
14 how overall revenue requirements are determined in these proceedings. The cost of
15 the fixtures reflects the installed cost of *new* fixtures, associated equipment, and
16 maintenance. In calculating the charge for poles for underground lighting service, the
17 annual cost was determined based on the embedded cost of an *existing* pole. In other
18 words, it is assumed that an LED fixture will be installed on an existing pole, and the
19 cost of the pole thus reflects the net depreciated cost of a pole on KU or LG&E's
20 system. This is a reasonable assumption because for most LED conversions the
21 existing pole will be used. The carrying charge calculations used to develop the rates
22 for the fixtures assume an average service life of 25 years for the new LED offerings.

1 The calculation of the charges for the overhead and underground LED fixtures and the
2 underground poles are shown in Exhibit WSS-4.

3 **Q. Are the Companies proposing to lower the LED Conversion Fee that was**
4 **authorized in the Companies last rate cases?**

5 A. Yes. The LED Conversion Fee was approved by the Commission in Case Nos. 2018-
6 00294 and 2018-00295. The Companies have updated the cost support for the
7 Conversion Fee, as shown in Exhibit WSS-5. Based on the updated cost support, KU
8 is proposing to reduce the monthly LED Conversion Fee from \$6.03 to \$5.01 per
9 fixture per month, and LG&E is proposing to reduce the monthly LED Conversion
10 Fee from \$7.37 to \$7.08 per fixture per month.³

11 **Q. Are the Companies proposing to offer customers an option to pay the LED**
12 **Conversion Fee as an up-front charge?**

13 A. Yes. The LED Conversion Fee was implemented by the Commission in Case Nos.
14 2018-00294 and 2018-00295. The LED Conversion Fee was structured as a monthly
15 charge that would be assessed over a period of five years. The Companies are
16 proposing an option that would allow customers to make an up-front payment of the
17 fee. The up-front payment reflects a discounted payment reflecting the discounted

³ For accounting purposes, the Companies record a portion of the monthly conversion fees as revenue and a portion as a credit to net plant (viz., Account No. 108 – Accumulated Depreciation - Salvage). The portion credited to plant reflects the contribution that the conversion fees make toward the direct recovery of the stranded plant cost. Based on the current LED Conversion fee, for KU \$2.07 of the fee is recorded as revenue and \$3.96 is recorded as a credit to plant, and for LG&E, \$2.56 of the fee is recorded as revenue and \$4.81 is credited to plant. Based on the proposed LED Conversion Fee, for KU \$1.72 of the fee would be recorded as revenue and \$3.29 would be credited to plant, and for LG&E \$2.46 of the fee would be recorded as revenue and \$4.62 would be credited to plant. While both charges are shown in Schedule M-2.3 for KU and LG&E, only the revenue components of the conversion fees are included in test-year revenues.

1 present value charges based on KU and LG&E's weighted cost of capital. A KU
2 customer that chooses to convert a restricted light to an LED light could elect to pay
3 either \$5.01 per month for 60 months or make an upfront payment of \$197.16. An
4 LG&E customer that chooses to convert a restricted light to an LED light could elect
5 to pay either \$7.08 per month for 60 months or make an upfront payment of \$277.29.

6 **Q. Please discuss the proposed rate changes to Rates LS, RLS, LE, and TE.**

7 A. KU is not proposing an increase for Rate LS and RLS in total. However, KU is
8 proposing changes to the monthly charges for individual fixtures and poles. For LED
9 fixtures offered under Rate LS, KU is proposing to change the monthly charge for
10 each fixture to reflect the current cost of the fixture. KU is also proposing to change
11 the monthly charge for poles to reflect the current cost of each pole. This generally
12 resulted in a reduction in the charges for LS LED fixtures and an increase in the
13 charges for LS poles. Accounting for the effect of eliminating the ECR projects and
14 the net reduction in revenue due to the decreases in the charges for LS fixtures and
15 poles resulted in an increase of approximately 1.75% for each RLS fixture⁴ to produce
16 revenue neutral rates for LS and RLS customer class as a whole. The overall
17 percentage increase in total revenue for LS and RLS, after accounting for revenues
18 from the rate mechanisms (FAC, ECR, etc.) is 0.00% for KU.

⁴ The 1.75% increase in monthly unit charges for non-LED fixtures reflects the effect of transferring cost recovery of eliminated ECR projects into base rates and the impact of the proposed adjustments in the charges for poles and LED fixtures to current customers. While there is an increase in the monthly unit charge for non-LED fixtures, there is a corresponding reduction in the ECR mechanism revenues that would be billed. Of the 1.75% increase, 1.63% is related to the transfer of cost recovery of ECR revenue into base revenue.

1 LG&E is proposing an increase of 11.90% for Rate LS and RLS in total. For
2 LED fixtures offered under Rate LS, LG&E is again proposing to change the monthly
3 charge for each fixture to reflect the current cost of the fixture. LG&E is also
4 proposing to change the monthly charge for poles to reflect the current cost of each
5 pole. This generally resulted in an increase in the charges for LS LED fixtures and an
6 increase in the charges for LS poles. Accounting for the effect of eliminating the ECR
7 projects and the increases in charges for LED fixtures and poles, an increase of
8 approximately 16.57% was required for each RLS fixture and pole⁵ to produce an
9 overall increase for Rate LS and RLS of 11.90%. Therefore, the overall percentage
10 increase in total revenue for LS and RLS, after accounting for revenues from the rate
11 mechanisms (FAC, ECR, etc.) is 11.90% for LG&E. The cost support for LED
12 fixtures under LS and for poles is included in Exhibit WSS-4. The Companies are not
13 proposing revenue increases for Rates LE and TE. However, the energy charge for
14 the rates are modified to reflect the elimination of ECR projects. Changes in all
15 lighting rates are shown in Schedule M-2.3 for KU and Schedule M-2.3-E for LG&E.

16

17 **M. SOLAR SHARE**

18 **Q. Please describe KU and LG&E's Solar Share rates.**

⁵ The 16.57% increase in the monthly unit charges for non-LED fixtures reflects the effect of transferring cost recovery of eliminated ECR projects into base rates and the impact of the proposed adjustments in the charges for poles and LED fixtures to current customers. While there is an increase in the monthly unit charge for non-LED fixtures, there is a corresponding reduction in the ECR mechanism revenues that would be billed. Of the 16.57% increase, 4.53% is related to the transfer of cost recovery of ECR revenue into base revenue.

1 A. KU and LG&E offer an optional Solar Share Program Rider (Rider SSP) under which
2 customers can purchase electric energy from solar panels jointly installed and maintained
3 by the Companies. Rider SSP was filed by the Companies on August 2, 2016, in Case
4 No. 2016-00274 and was approved by the Commission in its Order dated November 4,
5 2016. As originally filed, Rider SSP included three rate components: (1) an upfront
6 subscription fee, (2) a monthly Solar Capacity Charge, and (3) monthly Solar Energy
7 Credits for the energy produced by the Solar Share Facilities. On August 2, 2018, the
8 Companies filed revised tariff sheets with the Commission to consolidate the upfront
9 subscription fee with the Solar Capacity Charge and account for the effects of the federal
10 Tax Cuts and Jobs Act and Kentucky House Bill 487. This change, which was accepted
11 for filing by the Commission on August 28, 2018, resulted in the currently effective
12 monthly Solar Capacity Charge of \$5.55 per quarter-kW (nominal) subscribed.

13 **Q. Are the Companies proposing modifications to KU and LG&E's Solar Share**
14 **rates?**

15 A. No.

16 **Q. In the Companies' last rate cases, adjustments to miscellaneous revenues were**
17 **made to ensure that costs related to the Solar Share Program were not shifted**
18 **to other customers. Are the Companies making such adjustments for Solar**
19 **Share in these proceedings?**

20 A. Yes. The Solar Share Program was approved as a pilot program in Case No. 2016-
21 00274. In that proceeding, the Companies made a commitment that the Solar Share
22 Program would not result in increased charges to the Companies' other customers.

1 The Companies will continue to honor that commitment. To ensure that the costs of
2 the Solar Share Program are not shifted to other customers, the Companies have
3 imputed revenues to bring the class rate of return for Solar Share in the Companies'
4 cost of service studies up to the overall rate of return on rate base proposed by the
5 Companies in these proceedings. The Companies are also making imputed revenue
6 adjustments for their Business Solar Programs. Specifically, for the Solar Share
7 Programs, revenues of \$295,846 are imputed for KU and revenues of \$110,942 are
8 imputed for LG&E. For the Business Solar Programs, revenues of \$9,579 are imputed
9 for KU and revenues of \$9,378 are imputed for LG&E.

10

11 **N. NET METERING**

12 **Q. Are the Companies proposing a new rate schedule for Net Metering Service to**
13 **address recent amendments to KRS 278.465 – 278.467?**

14 A. Yes. The Companies are proposing a new rate schedule called “NMS-2 Net Metering
15 Service-2” that implements changes authorized by the amended statutes. NMS-2 will
16 apply to new or non-grandfathered eligible customer-generators served by KU or
17 LG&E on or after the date on which new rates from these proceedings take effect.
18 Eligible electric generating facilities for which the Companies’ written Application
19 for Interconnection and Net Metering have been executed prior to the date new rates
20 take effect will be grandfathered for 25 years under the Companies’ current rate
21 schedule for Net Metering Service, which will be renamed Net Metering Service – 1
22 (NMS-1). In my testimony, such customers who own such facilities are referred to as

1 “grandfathered net metering customers.” Customers to be served under NMS-2 are
2 referred to as “non-grandfathered” or “new” net metering customers.

3 **Q. What is a “customer-generator” according to the statutes?**

4 A. Subparagraph (1) of KRS 278.465 defines an “eligible customer-generator” as
5 follows:

6 “Eligible customer-generator” means a customer of a retail electric
7 supplier who owns and operates an electric generating facility that
8 is located on the customer’s premises, for the primary purpose of
9 supplying all or part of the customer’s own electricity requirements.
10

11 According to subparagraph (1)(b) of KRS 278.465, the eligible customer-generator
12 would generate power from an “eligible electric generating facility”, which must
13 generate electricity from solar energy, wind energy, biomass or biogas energy, or
14 hydro energy and cannot have a rated capacity above 45 kW. In the industry, an
15 “eligible customer-generator” is also referred to as a “renewable distributed generation
16 customer”. I will use the terms “customer-generator” and “distributed generation
17 customer” interchangeably to refer to an “eligible customer-generator” as defined in
18 KRS 278.465.

19 **Q. Does KRS 278.466 indicate that the utility shall compensate the customer-
20 generator for the energy supplied to the grid?**

21 A. Yes. Subparagraph (3) of KRS 278.466 states:

22 A retail electric supplier serving an eligible customer-generator shall
23 compensate that customer for all electricity produced by the
24 customer's eligible electric generating facility that flows to the retail
25 electric supplier, as measured by the standard kilowatt-hour
26 metering prescribed in subsection (2) of this section. The rate to be

1 used for such compensation shall be set by the commission using
2 the ratemaking processes under this chapter during a proceeding
3 initiated by a retail electric supplier or generation and transmission
4 cooperative on behalf of one (1) or more retail electric suppliers.
5

6 **Q. How are the Companies proposing to compensate new customer-generators for**
7 **energy they supply to the grid?**

8 A. Under the Companies' proposed NMS-2 schedule, new customer-generators will be
9 compensated for any net generation they supply to the grid (i.e., generation that
10 exceeds their energy requirements during the month) at the avoided cost rate set forth
11 in Rate B – Non-Time Differentiated Rate set for KU and LG&E's Small Capacity
12 Cogeneration and Small Production Qualifying Facilities Rider (Rider SQF).

13 **Q. Please provide some background on the Companies' Rider SQF.**

14 A. SQF was implemented to comply with Sections 201 and 210 of the Public Utility
15 Regulatory Policies Act of 1978 ("PURPA"). Both KU and LG&E were required to
16 implement rate schedules under which the Companies would purchase energy from
17 cogeneration and small power production qualifying facilities ("qualifying facilities").
18 These rate schedules were designed to apply to energy produced from cogeneration
19 and from small power production from what are now characterized as "renewable
20 resources". In its Order in Administrative Case No. 244, the Commission introduced
21 807 KAR 5:054 implementing Sections 201 and 210 of PURPA.⁶ In compliance
22 with those regulations, the Companies filed rate schedules applicable to energy

⁶ See *The Adoption of a Small Power Production and Cogeneration Regulation Pursuant to Section 210 of Public Utility Regulatory Policies Act*, Admin. Case No. 244, Order (Ky. P.S.C. Feb. 10, 1981).

1 purchased from qualifying facilities. Rider SQF is applicable to energy purchased
2 from qualifying facilities of 100 kW or less.

3 **Q. What are *avoided energy costs*, and why is it appropriate to compensate customer-**
4 **generators at a rate reflective of avoided costs?**

5 A. The term *avoided energy costs* means the incremental costs of the energy that the
6 utility would otherwise generate itself or purchase from another source if the
7 customer-generator did not supply the energy. Whenever a distributed generation
8 customer supplies electric energy to the grid, the utility can avoid generating the
9 energy or purchasing the energy from another power supplier and thus avoid the
10 incurring cost of the generating or purchasing the energy. Because of the intermittent
11 and uncertain nature of the energy source (i.e., due the intermittent and uncertain
12 availability of wind, sunlight, etc.), renewable distributed generating facilities
13 identified in subparagraph (1)(b) of KRS 278.465 cannot be dispatched by the utility
14 and cannot be supplied as firm capacity. Thus, only energy costs are avoided by the
15 utility receiving electric energy from a customer-generator. Accordingly, the energy
16 rates for energy purchases under SQF, which apply to qualifying facilities of 100 kW
17 or less and are based on avoided energy costs, should also apply to the energy supplied
18 to the grid by new customer-generators, as addressed in Subparagraph (3) of KRS
19 278.466. As specified in Subsection (5)(1)(a) of the 807 KAR 5:054 of the
20 Commission's regulations, the Companies' avoided energy costs, as used to determine
21 the purchase rates under SQF, are updated every two years. Using the avoided cost
22 rate set forth in SQF will therefore place the compensation that new customer-

1 generators receive under NMS-2 on the same non-discriminatory footing as the
2 compensation that qualifying facilities receive under SQF.

3 **Q. Will compensating customer-generators at avoided costs for the energy they**
4 **supply to the grid put net metering on a more economically accurate footing for**
5 **new customer-generators?**

6 A. Yes. Under the older-style net metering service (such as the Companies' NMS-1,
7 which will continue to be available for grandfathered customer-generators), customer-
8 generators would be compensated for the power they put on the grid at a rate that is
9 *over four times* the cost that would otherwise be incurred by the Companies to
10 generate the power themselves or purchase the power. For example, KU is proposing
11 an energy charge of \$0.09950 per kWh for Rate RS. Therefore, under the older-style
12 net metering service such as NMS-1, KU would effectively compensate customer-
13 generators at a rate of \$0.09950 per kWh plus amounts reflecting various cost-
14 recovery riders (i.e., FAC, DSM, and ECR) for power they supply to the grid.
15 However, the cost that KU would incur to generate this power itself or purchase the
16 power is currently only \$0.02173 per kWh.⁷ Consequently, under the older-style net
17 metering service such as NMS-1, customer-generators are compensated at a rate that
18 is *over four times* the economic value of the energy. This creates the situation in
19 which one group of customers, customer-generators, is being subsidized by other
20 customers, non-customer-generators. This is particularly problematic in the case of

⁷ \$0.2173 per kWh is the current non-time-differentiated avoided cost rate in KU for Small Cogeneration and Small Power Production Qualifying Facilities (Standard Rate Rider SQF).

1 low-income customers who may not be able to afford to install solar panels or other
2 types of distributed generation facilities. In those instances, lower-income customers,
3 who may not be able to afford solar panels, would be required to subsidize higher-
4 income customers who can afford to install solar panels. Compensating customer-
5 generators at avoided costs for the power they put on the grid will eliminate these
6 types of cross subsidies and will establish a more economically accurate framework
7 for compensating net metering customers.

8

9 **O. OTHER COST CONSIDERATIONS FOR SERVING CUSTOMER-**
10 **GENERATORS**

11 **Q. Are there provisions of the net metering statutes that the Companies are choosing**
12 **not to address at this time?**

13 A. Yes. Subsection (5) of KRS 278.466 states:

14 Using the ratemaking process provided by this chapter, each retail
15 electric supplier shall be entitled to implement rates to recover from
16 its eligible customer-generators all costs necessary to serve its
17 eligible customer-generators, including but not limited to fixed and
18 demand-based costs, without regard for the rate structure for
19 customers who are not eligible customer-generators.
20

21 This subsection entitles electric energy suppliers subject to KRS 278.465 to .467 to
22 implement new rate schedules that recover the cost of providing service to customer-
23 generators “without regard for the rate structure for customers who are not eligible

1 customer-generators”.⁸ The Companies are choosing not to develop cost-based rates
2 designed specifically for distributed generation customers at this time, but the
3 Companies plan to continue to evaluate the use of cost-based rate designs, such as
4 four-part rates that include a customer charge, energy charge, peak demand charge,
5 and base demand charge, to serve distributed generation customers.

6 **Q. Why aren’t the Companies implementing fully cost-based rates that recover fixed
7 and demand-based costs?**

8 A. By compensating net generation based on the rates set forth in SQF, the Companies
9 believe that they are taking a major step toward addressing some of the subsidy issues
10 related to serving distributed generation customers. The Companies’ proposal
11 represents a gradual movement toward implementing a cost-based pricing structure
12 for customer-generators that will reduce *some of the subsidies* provided by non-
13 distributed generation customers to distributed generation customers. The
14 Companies’ proposal is thus consistent with the ratemaking principles of rate
15 continuity and gradualism. Before implementing fully cost-based rate structures, such
16 as four-part rates, the Companies have also determined that it is necessary to gather
17 more load data for distributed generation customers. Additionally, the Companies
18 believe that more community and customer education and outreach are necessary
19 before taking additional steps toward implementing fully cost-based rates – such as
20 four-part rate designs – for distributed generation customers.

⁸ KRS 278.466(5).

1 **Q. What pricing structures have been utilized in other jurisdictions to reflect the**
2 **cost of serving distributed generation customers?**

3 A. There has been a movement toward implementing three- or four-part rates for
4 distributed generation customers, consisting of a customer charge, energy charge and
5 one or two demand charges. For example, in its Order in Docket No. 15-WSSE-115-
6 RTS, the Kansas Corporation Commission approved a residential rate schedule⁹ for
7 Westar Energy Company (now called “Eversource Energy Kansas Central, Inc.”¹⁰) (hereinafter
8 referred to as “Eversource”) that required any residential customer adding behind-the-
9 meter electric generation after October 28, 2015,¹¹ to take service under a three-part
10 rate schedule consisting of a customer charge, energy charge and a seasonally
11 differentiated demand charge. Eversource serves approximately 1.6 million customers in
12 Kansas and Missouri. Eversource’s Residential Standard Distributed Generation Rate (see
13 Exhibit WSS-6) currently consists of the following rate components:

| | | |
|----|--------------------------|-------------------|
| 14 | Basic Service Fee | \$14.50 per month |
| 15 | Energy Charge | 4.5840 ¢ per kWh |
| 16 | Demand Charge | |
| 17 | Winter Period | \$3.00 per kW |
| 18 | Summer Period | \$9.00 per kW |

⁹ Approval of the tariff was affirmed in Docket No. 18-WSEE-328-RTS after being considered in Docket No. 16-GIME-4030-GIE, which was an administrative case styled “In the Matter of the General Investigation to Examine Issues Surrounding Rate Design for Distributed Generation Customers.”

¹⁰ In 2018, Westar Energy received regulatory approval to be merged with Great Plains Energy to form Eversource, Inc. Eversource serves approximately 1.6 million customers in Kansas and Missouri.

¹¹ The date applicable to new distributed generation was subsequently moved to October 1, 2018, in the Kansas Corporation Commission’s Order in Docket No. 18-WSEE-328-RTS.

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The demand charge in the rate helps prevent a customer with behind-the-meter generation from shifting fixed, and therefore unavoidable, demand-related capacity costs onto other residential customers. In its Order in Docket No. 16-GIME-403-GIE, the Kansas Corporation Commission stated:

[T]he Commission finds the current two-part residential rate design [consisting of only a customer charge and energy charges] is problematic for utilities and residential private DG [distributed generation] customers because DG customers use the electric grid as a backup system resulting in their consuming less energy than non-DG customers, which results in DG customers not paying the same proportion of fixed costs as non-DG customers. The Commission finds DG customers are thus being subsidized by non-DG customers.¹²

For ease of reference, Kansas Corporation Commission’s Order in Docket No. 16-GIME-403-GIE is attached hereto as Exhibit WSS-7. Challenges with serving distributed generation customers are generally recognized in the industry and utilities are beginning to develop rate designs such as Evergy’s three-part rates or four-part rates to address the issue. Other utilities and regulatory commissions have also recognized the problem with the continued use of two-part rates consisting of only a customer charge and energy charge for serving distributed distribution customers. The New Mexico Public Regulation Staff has filed testimony in a number of proceedings pointing out problems with serving distributed generation customers under two-part

¹² *Final Order*, Docket No. 16-GIME-403-GIE dated September 21, 2017, at p.

1 rates.¹³

2 **Q. KRS 278.466 addresses the recovery of fixed- and demand-based costs. Why is**
3 **it important for utilities to have rates that provide for the recovery of these types**
4 **of costs to serve customer-generators?**

5 A. Serving distributed generation customers under two-part rate schedules such as
6 Residential Service RS, General Service GS, and All Electric School Service AES
7 creates a pricing environment in which customers who do not have their own electric
8 generation facilities are forced to subsidize customers who operate their own behind-
9 the-meter generating facilities. As will be explained, a two-part rate schedule
10 consisting of a customer charge and an energy charge allows a customer-generator
11 with solar panels, for example, to fall back on the utility when sunlight is not available
12 and avoid paying the full cost of service. Therefore, serving distributed generation
13 customers under a two-part rate consisting of only a customer charge and energy
14 charge forces non-distributed generation customers to subsidize distributed generation
15 customers. Because it accurately reflects cost of service, a four-part rate would ensure
16 that distributed generation customers are not over-charged or under-charged for the
17 service they receive. A four-part rate design would thus prevent customers who do
18 not have electric generation facilities from subsidizing distributed generation
19 customers.

20 **Q. Do KU and LG&E have any four-part rate schedules?**

¹³ For example, testimony was filed by Southwest Public Service Company and the New Mexico Public Regulation Staff in Case No. 17-00255-UT on the issue.

1 A. Yes. The Companies have used four-part rates for decades for its large customers.
2 Rates TODS, TODP, RTS, and FLS are four-part rates. Four-part rates are mandatory
3 for all customers with loads greater than 250 kVA. The Companies require customers
4 with demands between 50 kVA and 250 kVA to take service under Rate PS, which is
5 a three-part rate consisting of a customer charge, energy charge and maximum demand
6 charge.¹⁴ A wide variety of customers take service under these rate schedules. Load
7 factors of customers taking service under these rates range from less than 5% to almost
8 100%. To put this in perspective, a residential customer will typically have a load
9 factor based on their maximum demand of between 15% to 30%. Therefore, there
10 are customers taking service under these rates with load factors less than a typical
11 residential customer.

12 **Q. Why have residential and small commercial and industrial (C&I) customers**
13 **traditionally not been served under rate schedules with demand charges?**

14 A. The concept of demand rates was conceived in the 1890s by the British electrical
15 engineer John Hopkinson.¹⁵ It was not long afterwards that electric utilities began
16 billing some their customers under demand-energy rates, which were often referred to
17 as “Hopkinson Rates”. Based on my research, the principal reason that residential and
18 small C&I customers were not originally served under three- and four-part rates was

¹⁴ The only exception to this is that all-electric schools taking service prior the KU system on or before July 1, 2011, were allowed to continue to be served under a two-part rate schedule. Except for this grandfathering provision, customers with demand greater than 50 kVA must be served under demand-based rates.

¹⁵ See “Presidential Address to the Junior Engineering Society, 4th Nov., 1892, On the Cost of Electric Supply”, *Original Papers by the Late John Hopkinson*, Vol 1 (1901), pp. 254-268.

1 the high cost of metering equipment required to measure a customer's maximum or
2 peak period demands. Until recently, to implement a three-part rate required a
3 relatively expensive demand meter (e.g., a reset demand meter), and to implement a
4 four-part rate required the installation of special chart meters or paper tape meters,
5 which were even more expensive than reset demand meters. (See photos in Exhibit
6 WSS-8.) These types of meters were generally available during the very early years
7 of the electric utility industry, but they were prohibitively expensive. Consequently,
8 they were only used for the largest customers served by electric utilities. As early as
9 1915, some rate engineers were promoting demand and energy rates for *all* customers.
10 For example, the electrical engineer Paul M. Lincoln had developed a relatively
11 inexpensive thermal meter which he promoted for use in measuring customer's
12 maximum demand.¹⁶ Lincoln argued that his meter could eventually be used to
13 implement demand rates for all types of customers, including residential customers.
14 While the meter was relatively inexpensive, it proved not to be sufficiently accurate

¹⁶ The meter was called the "Lincoln Demand Meter". See also, Paul M. Lincoln, "Rates and Rate Making", *Transactions of the American Institute of Electrical Engineers*, July to December 1915, at pp. 2279-2318. It is of historical interest that in responding to Lincoln's paper, the utility executive Louis R. Lee clearly described the basis for a four-part rate:

[T]he idea of the demand charge is to cover fixed charges necessary to handle the demand both at power station in the distribution system and in service transformers. In the power station the portion of fixed cost which any individual customer should be charged with, would be based up his average demand during the peak load on the power plant. For the distribution system and service transformers, however, the amount which would be chargeable to the individual customer would depend upon his maximum demand regardless of the time of its occurrence. (Id., at p. 2354.)

1 for use in billing customers.¹⁷ During the early history of the electric utility industry,
2 the principal residential use of electric energy was for lighting. Electric appliances
3 such as clothes irons, fans and refrigerators did not become prevalent until much later.
4 Because customer loads for lighting were considered homogenous, demand metering
5 was not considered necessary during the early years of the industry.¹⁸ But as
6 residential customers began to use a multitude of appliances, residential customer
7 loads became more diverse and less homogeneous. Until the emergence of Advanced
8 Metering Systems (AMS) and Advanced Metering Infrastructure (AMI), the
9 implementation of demand rates on a wide scale for residential and small C&I
10 customers was not considered practical. Over the past decade, a small but growing
11 number of utilities have implemented demand rates for all their residential customers,
12 not just new distributed generation customers as in Kansas.

13 **Q. Do customers with distributed generation facilities generally have different load**
14 **characteristics than customers who do not own generation facilities?**

15 A. Yes. Customers with distributed generation facilities typically have significantly
16 different load characteristics and load shapes than customers that do not have
17 distributed generation facilities. For example, customer-generators will have lower
18 load factors than non-distributed generation customers. The following graph (GRAPH

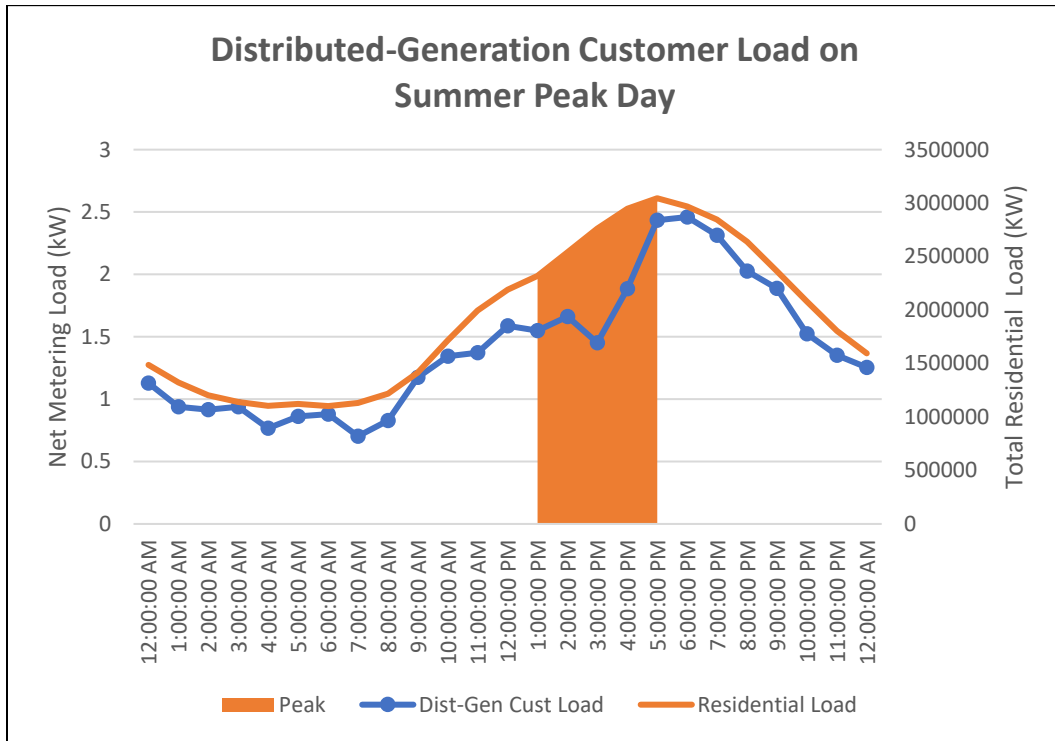
¹⁷ The meter design was eventually purchased by Sangamo Electric Company and was used in non-billing industrial applications until the 1960s.

¹⁸ Id. at pp. 2319-2360.

1 3) compares the loads for a small sample of the Companies' residential customers¹⁹
2 with solar panels to the loads for the residential rate class on a *summer* peak day:

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GRAPH 3



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As can be seen from this graph, loads for the distributed generation customers are depressed during the hours of the day when there is sufficient sunlight to operate the solar panels, but the graph shows a spike in the customer-generators' loads in the

¹⁹ The sample includes customer loads for which the Companies have MV90 telemetering data. There were 20 residential net metering customers served by KU and 15 net metering customers served by LG&E. The analysis of the data is intended to be illustrative. The Companies plan to collect more load data for net metering customers before evaluating four-part rates for distributed generation customers.

1 evening when the sunlight is no longer available for solar generation.²⁰ However, KU
2 and LG&E must stand ready to deliver power to distributed generation customers
3 when the load spikes in the evening. Thus, distributed generation facilities do not
4 result in appreciable savings in generation, transmission, or distribution fixed costs.
5 With a two-part rate, in which generation, transmission and distribution demand costs
6 are recovered through a volumetric-based energy charge, the customer-generators
7 realize reductions in their electric bills that are disproportionate to the savings created
8 by the customer's solar generation. This results in other customers subsidizing
9 distributed generation customers.

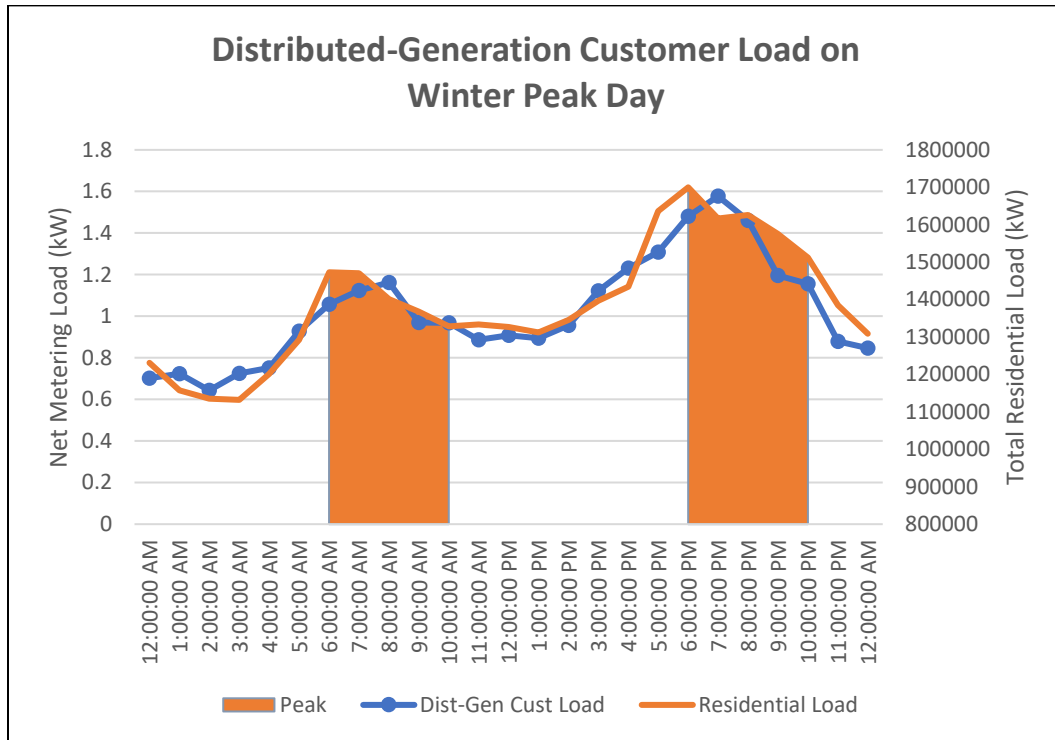
10 The following graph (GRAPH 4) compares the loads for the Companies'
11 residential customers with solar panels to the loads for the residential rate class on a
12 *winter* peak day:

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²⁰ California utilities rely heavily on utility- and customer-owned solar power to meet peak demands. In mid-August, a heat wave in California resulted in rolling blackouts on two consecutive days. The problem came in the evening when solar generation dropped off. The rolling outages affected several hundred thousand customers starting around 6:30 PM on August 14 and 15, 2020. Once solar power provided to the grid fell below 6 percent of the load, grid operators were required to institute rolling blackouts. A spokesperson for the California Independent System Operator said, "The peak demand was steady in late hours, and we had thousands of megawatts of solar reducing their output as the sun set." *Forbes*, August 15, 2020.

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GRAPH 4



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As can be seen from this graph, on the winter peak day, the loads for residential distributed generation customers do not have an appreciably different pattern than the loads for the Companies' residential customers. KU and LG&E's combined system peak demand occurs during the hours from 6 AM to 10 AM during the morning and from 6 PM to 10 PM during the evening. During these hours, the customer-generators' solar panels are not operating at significant levels. Therefore, the Companies must have sufficient generation, transmission, and distribution capacity to serve customer-generators' loads during those hours. The distributed generation facilities do not appear to result in *any* fixed cost savings to the customers. But with

1 a two-part rate in which fixed costs are recovered through a volumetric energy charge,
2 the distributed generation customers are able to shift demand-related cost recovery to
3 other customers without creating any fixed-cost savings.

4 **Q. Please describe the costs necessary to serve eligible customer-generators.**

5 A. Earlier in my testimony, I discussed that an electric utility incurs three types (or
6 “classifications”) of costs to serve customers – namely, energy-related costs, demand-
7 related costs, and customer-related costs. These same three types of costs are also
8 incurred to serve customer-generators.

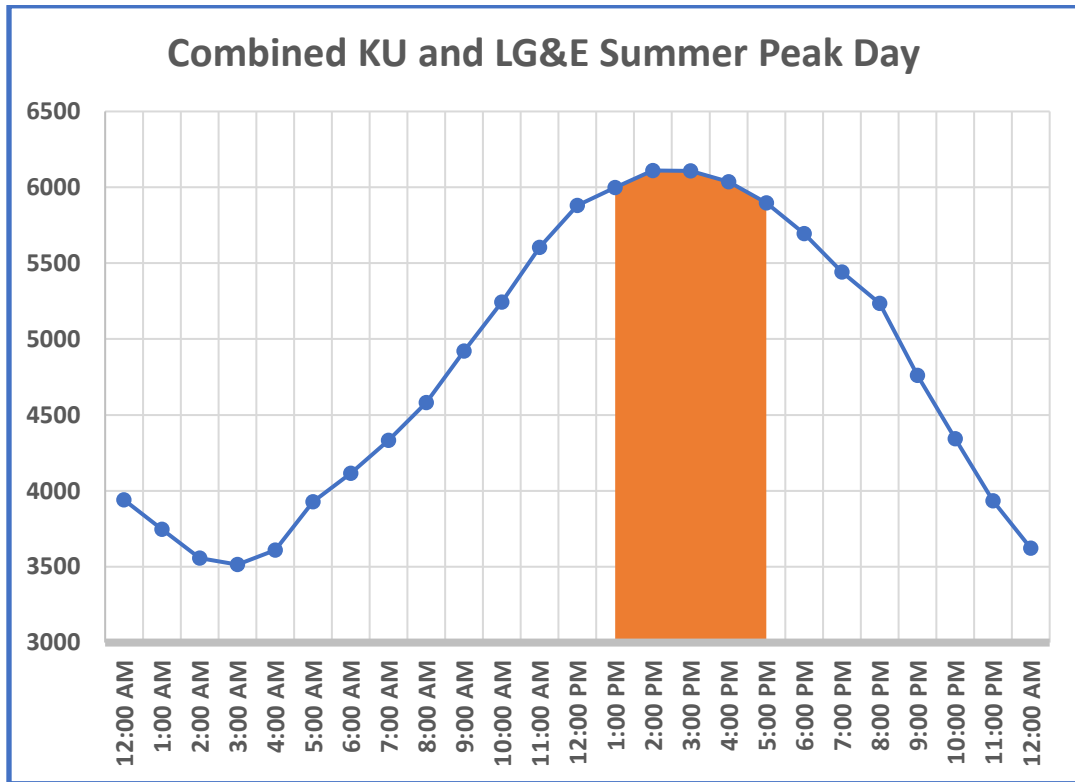
9 As explained earlier in my testimony, *energy-related costs* are the strictly
10 variable expenses, such as fuel costs, that an electric utility incurs to supply the amount
11 of energy measured in kilowatt-hours (kWh) that a customer uses. To the extent that
12 a customer-generator produces energy from its own electric generation facilities,
13 instead of purchasing the energy from the utility, the energy-related cost incurred by
14 the utility to serve that customer is reduced or avoided.

15 *Demand-related costs* are costs related to the maximum load or kW demand
16 placed on the utility system. An electric utility must install sufficient generation,
17 transmission and distribution capacity to meet the maximum demand placed on the
18 facilities. These costs are therefore demand related. For example, an electric utility
19 must have sufficient generation capacity to serve its maximum system peak demand.
20 The maximum system peak demand represents the aggregated load of all of its
21 customers, effectively taking into consideration that while individual customers may
22 have different load patterns, when they are all added together the aggregated loads

1 result in a well-defined load shape for the system as a whole. Based on their combined
2 system loads in MW, KU and LG&E's load pattern on a summer peak day is depicted
3 below (GRAPH 5).

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GRAPH 5



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8 KU and LG&E must install sufficient generation and transmission capacity to meet
9 the summer system peak demand that occurs between the hours of 1 PM to 5 PM
10 during the summer months.

11

An integrated electric utility such as KU and LG&E must also have sufficient

1 distribution capacity to serve its customers' loads. Unlike generation facilities,
2 distribution facilities must be sized to meet the localized loads of individual customers
3 served on the distribution system. For example, an electric utility must install
4 sufficient secondary distribution capacity, transformer capacity, and service line
5 capacity to serve a customer's individual maximum demand whenever it occurs. This
6 is precisely the reason that distribution demand-related costs are allocated differently
7 in the Companies' class cost of service studies than production and transmission costs,
8 as discussed later in my testimony. Therefore, to the extent that a customer-generator
9 can reduce the maximum demand placed on the system, these demand-related
10 distribution costs can be reduced.

11 *Customer-related* costs are costs incurred to serve customers regardless of the
12 quantity of electric energy (kWh) purchased or the peak demand requirements (kW)
13 of the customers. As with any other customers, customer-related costs are incurred
14 to serve customer-generators.

15 **Q. How are *energy-related costs* impacted by customer generation?**

16 A. The electric energy produced by a customer-generator allows an electric utility to
17 avoid its *energy-related* costs. If a customer generates energy with any type of
18 distributed generation technology, then the utility is not required to generate that
19 energy to serve the customer. The utility's energy-related costs are thereby reduced.
20 Thus, the customer-generator that reduces its energy should not pay for the energy-
21 related costs. Furthermore, a customer-generator that generates more energy than the
22 total amount of the customer-generator's own energy requirements, thereby resulting

1 in *net generation*, allows the utility to further avoid its energy-related costs. The
2 customer-generator should therefore be compensated for such net generation at a rate
3 that reflects the utility's avoided energy costs. In other words, the customer-generator
4 that generates net energy should receive a billing credit that reflects KU and LG&E's
5 avoided energy costs as set forth in Rider SQF.

6 **Q. How are *demand-related costs* impacted by customer generation?**

7 A. If a customer-generator can consistently generate power at the time of the utility's
8 system peak demand, then the utility will not incur demand-related generation costs
9 to serve the customer. Specifically, if a customer-generator can generate power during
10 KU and LG&E's peak period, as shown in GRAPH 5 above, the Companies do not
11 need to have generation capacity to serve the customer-generator. Consequently, the
12 customer-generator should only be assessed a generation demand charge during the
13 Companies' peak periods. Likewise, if a customer-generator can reduce the
14 maximum demand that is placed on the distribution system, the Companies are not
15 required to install the distribution facilities for the reduced load. Therefore, if a
16 customer-generator can reduce its maximum demand through self-generation, then the
17 customer-generator should pay a lower distribution demand cost.

18 **Q. Is it possible for customer-generators to reduce demand-related costs?**

19 A. Yes, but the extent to which demand cost reductions can be realized depends on the
20 distributed generation technology used by the customer. *Not all distributed*
21 *generation technologies create the same demand cost savings.* For example, assume
22 a customer-generator installs a combination of solar panels and battery storage. The

1 combination of solar panels and battery storage can be managed to ensure that both
2 peak-period demands and customer-maximum demands are reduced. This is not
3 likely to be the case for a customer-generator who installs only solar panels. With
4 solar panels, power is generated only when there is sufficient sunlight to produce
5 power. If the solar panels are not producing power during the peak period, then no
6 generation demand cost savings can be realized. These two examples underscore the
7 difference in demand savings created by various distributed generation configurations
8 and underscore the importance of including a demand charge in the pricing structure
9 for distributed generation. With a pricing structure in which demand costs are
10 recovered as an energy charge (per kWh charge), rather than as a demand charge (per
11 kW charge), a technology configuration that includes only solar panels would receive
12 the same pricing benefits as a technology configuration that includes both solar panels
13 and battery storage, even though a combination of solar panels and battery storage can
14 be managed to provide significantly higher demand cost savings. Recovering demand-
15 related costs through a per-kWh charge overcompensates a customer-generator that
16 installs solar panels but without battery storage.

17 **Q. Can you provide a numerical example of how a customer-generator with solar**
18 **panels, but no battery backup, is more costly to serve than a customer-generator**
19 **with solar panels and managed battery storage?**

20 A. Yes. Consider the example of a residential customer served by either KU or LG&E
21 with a maximum demand of 10 kW during the summer and 20 kW during the winter.
22 Suppose that during the summer, the customer has 7 kW of air-conditioning load and

1 3 kW of lighting, refrigeration, water heating, and other load, and that during the
2 winter the customer has 17 kW of electric heating load and 3 kW of lighting,
3 refrigeration, water hearing and other load. Assume further that the customer has 20
4 kW of solar panel capacity. During the summer months, it is likely that the solar
5 panels are fully or partially operational during the KU and LG&E peak hours from
6 1:00 to 5:00 PM. Therefore, solar panels may result in a partial reduction in
7 generation demand costs. However, during the evening hours, when the customer's
8 solar panels are not generating power, the customer will still be operating air
9 conditioning equipment and will be fully utilizing KU or LG&E's distribution system.
10 Consequently, the customer's solar generation does not result in a reduction of the
11 distribution capacity required to serve the customer. For this reason, the customer-
12 generator should be assessed a charge that reflects the demand that the customer
13 imposes on the distribution system.

14 During the winter, KU and LG&E's peaks typically occur during the hours of
15 6 AM to 10 AM in the morning and 6 PM to 10 PM in the evening. During those
16 hours, it is less likely that the customer's solar panels are generating power.
17 Therefore, KU and LG&E must have the generation, transmission, and distribution
18 capacity necessary to serve the customer-generator's full load. Since the customer-
19 generator cannot reduce demand during the peak period, the customer-generator
20 should be assessed a charge that reflects the demand that the customer imposes on the
21 generation, transmission, and distribution system.

22 **Q. But what about a customer-generator who has installed solar panels and**

1 **managed battery storage?**

2 A. Let us assume that the same customer has installed 40 kW of solar panels but has also
3 installed lithium ion batteries with 20 kW maximum output and with the ability to
4 store energy for several days. Then the customer can store electric energy in the
5 batteries while the solar panels are operating but draw power from the batteries when
6 there is insufficient sunlight to generate power from the solar panels. This customer
7 can effectively reduce the demand imposed on the generation system during KU and
8 LG&E's system peak periods and also reduce the maximum demand that the customer
9 places on the Companies' distribution systems. Therefore, unlike a customer with
10 only solar panels, this customer can fully reduce the production demand costs required
11 to serve the customer and partially reduce the distribution costs incurred to serve the
12 customer. Because the customer-generator with a combination of solar panels and
13 managed battery storage can fully reduce demand during the peak period, along with
14 reducing maximum demand during the month, the customer-generator should be
15 assessed lower demand charges than a customer-generator with only solar panels. But
16 this would not be the case if the customer is served under a two-part rate. With a two-
17 part rate design, consisting of only a customer charge and an energy charge, there is
18 no *economic* benefit for installing battery storage. With a two-part rate, the only
19 benefit for adding battery storage is increased reliability.

20 **Q. How are *customer-related costs* impacted by customer generation?**

21 A. Customer-related costs are not impacted by customer generation. Customer-related
22 costs are the costs related to connecting the customer to the system and include the

1 cost of the meter, service line, the minimum distribution assets required to connect the
2 customer to the grid, and meter reading and billing costs. These costs do not vary with
3 the customer's energy usage or demand.

4 **Q. Will the Companies be investigating these issues in the future?**

5 A. Yes, that is their intention.

6

7 **P. ELECTRIC VEHICLE CHARGING STATION RATES**

8 **Q. Do KU and LG&E currently offer public electric vehicle charging service?**

9 A. Yes. KU and LG&E currently provide electric vehicle charging service to licensed
10 electric vehicles from twenty Level 2 Charging Stations. Service is provided from
11 these Level 2 Charging Stations under Electric Vehicle Charging Service Rate EVC,
12 which was originally approved by the Commission in Case No. 2015-00355 and
13 substantially modified in the Companies' last general rate case filings in Case Nos.
14 2018-00294 and 2018-00295.

15 **Q. Are the Companies proposing any changes to the Level 2 charging service set
16 forth in Rate EVC?**

17 A. No.

18 **Q. In the Companies' last rate cases, adjustments to miscellaneous revenues were
19 made to ensure that costs related to Level 2 charging under Rate EV were not
20 shifted to other customers. Are the Companies making such an adjustment for
21 Level 2 charging service in these proceedings?**

22 A. Yes. Level 2 Charging Service under Rate EV was approved as a pilot program in

1 Case No. 2015-00355. In that proceeding, the Companies made a commitment that
2 the Level 2 charging service would not result in increased charges to the Companies’
3 other customers. For Level 2 charging service offered under Rate EV, the Companies
4 will continue to honor that commitment. To ensure that the cost of providing Level 2
5 charging service isn’t shifted to other customers, the Companies have imputed
6 revenues for Rate EV to bring the class rate of return for Rate EV in the Companies’
7 cost of service studies up to the overall rate of return on rate base proposed by the
8 Companies in these proceedings. Specifically, revenues of \$48,431 are imputed for
9 KU and revenues of \$55,206 are imputed for LG&E.

10 **Q. Are KU and LG&E proposing a new electric vehicle charging rate schedule in**
11 **these proceedings?**

12 A. Yes. The Companies are proposing a new rate schedule to provide Level 3 Charging
13 Service, which is generally referred to as “*DC Fast Charging Service*”. The new rate
14 schedule for DC Fast Charging Service is called “EVC-FAST Electric Vehicle Fast
15 Charging Service.”

16 **Q. Please describe the differences between Level 1, Level 2 and Level 3 Charging.**

17 A. A *Level 1 Charger* is the most basic type of electric vehicle charger, which charges a
18 vehicle from a standard 120V household outlet. A Level 1 charger can only provide
19 about 4 to 5 miles of driving per hour, which for some drivers can be sufficient if the
20 vehicle is charged through the night and if the vehicles are driven relatively short
21 distances.

22 A *Level 2 Charger* charges a vehicle from a 240V outlet and will typically

1 provide between 12 and 60 miles of range per hour. A 240V circuit is typically what
2 is required for electric washing machines, dryers, and central air-conditioning units.
3 As the mileage range of electric vehicles increases, it is anticipated that most
4 residential customers with electric vehicles will install Level 2 Chargers. The electric
5 vehicle charging service currently provided by KU and LG&E under Rate EV utilizes
6 Level 2 Charging Technology.

7 A *Level 3 Charger* (or “DC Fast Charging Station”) is a primary voltage
8 charger that uses a direct current (DC) circuit to charge a plug-in electric vehicle. In
9 comparison to the Companies’ Level 2 stations, which provide charging at a rate of
10 7.2 kW, the DC Fast Charging Stations will be able to charge at a rate of 50 kW or
11 greater (i.e., 50 kWh or greater per hour). A DC Fast Charging Station can provide
12 300 miles of range or more in about an hour, although charging speeds vary.
13 Beginning in the second half of 2022, KU and LG&E plan to install DC Fast Charging
14 Stations to provide service under Rate EVC-FAST. DC Fast Chargers are a key
15 *enabling technology* for the adoption of electric vehicles.

16 **Q. Are any costs of DC Fast Charging Stations included in revenue requirements**
17 **in these proceedings?**

18 A. No. All costs incurred to install and operate any DC Fast Charging Stations would
19 be incurred beyond the end of the forecasted test year used in these proceedings.
20 Therefore, revenue requirements in these proceedings do not include any costs of DC
21 Fast Charging Stations. In these proceedings, the Companies are requesting approval
22 for rates for service from DC Fast Charging Stations that the Companies plan to install

1 beginning in the second half of 2022.

2 **Q. Are there benefits to ratepayers from the adoption of electric vehicles?**

3 A. Yes. The adoption of electric vehicles by residential and non-residential customers
4 has an enormous potential to reduce the unit cost of providing electric service to
5 electric utility customers. What is particularly compelling about the adoption of
6 electric vehicles *from a utility customer's perspective* is that electric vehicle charging
7 by customers typically takes place through the night, when electric utility loads are at
8 their lowest levels. A residential customer who owns an electric vehicle will typically
9 drive the vehicle during daytime hours and charge the vehicle at night. Since electric
10 vehicles are typically connected to home charging stations during off-peak hours,
11 increased numbers of electric vehicles will result in additional revenue but typically
12 without creating the need to install new generation, transmission or even distribution
13 capacity to serve the load. Consequently, increased electric vehicle ownership helps
14 spread fixed generation and transmission costs over a larger number of sales, thus
15 placing a downward pressure on the Companies' rates. Increasing electric vehicle
16 charging sales provides benefits comparable to adding new industrial and commercial
17 load from economic development efforts. Just as adding new large commercial and
18 industrial loads allows KU and LG&E to spread fixed costs over a larger number of
19 sales, additional electric vehicle charging will allow KU and LG&E to spread their
20 fixed costs over a larger sales base.

21 **Q. How does the adoption of electric vehicles in Kentucky compare to other states?**

22 A. Kentucky ranks as a state with one of lowest numbers of electric vehicles in the

1 country. According to data published by the United States Department of Energy, on
2 a per capita basis, Kentucky had the sixth lowest number of electric vehicles registered
3 in the state, ahead of only West Virginia, Mississippi, Arkansas, North Dakota, and
4 Louisiana. In 2018, there were 1,240 electric vehicles registered in Kentucky, which
5 corresponds to 27.75 electric vehicles registered for every 100,000 residents in
6 Kentucky,²¹ though this number appears to be growing.²² Undoubtedly, there is a
7 regional element to the adoption of electric vehicles, with the highest levels of
8 adoption in California, Hawaii, Washington, and Oregon. However, there are also
9 high levels of adoption in Georgia, Florida, Virginia, Texas, and North Carolina. For
10 example, in 2018, there were 5 times more electric vehicles per 100,000 residents
11 registered in Georgia than in Kentucky, and there were 4 times more electric vehicles
12 per 100,000 residents registered in Florida than in Kentucky. Although the number of
13 electric vehicles in Indiana cannot be considered high, there were almost twice the
14 number of electric vehicles per 100,000 residents in Indiana as in Kentucky.

15 **Q. What are the major impediments to the adoption of electric vehicles?**

16 A. As I mentioned earlier, a plug-in electric vehicle is significantly less costly to operate
17 than a conventional passenger vehicle. Therefore, it is useful to consider what the
18 impediments are to the widespread adoption of electric vehicles. Based on my
19 research, there are four major impediments to the adoption of plug-in electric vehicles,

²¹ See Exhibit WSS-9.

²² According to the Electric Power Research Institute (EPRI), the number of electric vehicles registered in Kentucky grew to 4,133 in June 2020.

1 three of which are being quickly addressed in the automotive industry.

2 The *first impediment* is the higher cost of a plug-in electric vehicle in
3 comparison to a traditional vehicle powered by an internal combustion engine.
4 However, over the past few years there has been a dramatic decrease in the cost
5 difference between plug-in electric vehicles and conventional passenger vehicles.
6 This reduction seems to have been in large part due to the engineering, manufacturing
7 and marketing by Tesla, Inc. and other manufacturers. Based on the trends over the
8 past several years, we can expect the price difference between plug-in electric vehicles
9 and conventional vehicles to continue to decline as the economies of scale increase
10 for electric vehicles.

11 The *second impediment* to the adoption of plug-in electric vehicles is the
12 mileage range of the batteries. Again, this is an area in which the automotive industry
13 is making dramatic improvements. For example, Tesla currently sells seven vehicles
14 with a range of over 300 miles on a fully charged battery. Tesla's Model S Long
15 Range Plus has a listed range of 391 miles. General Motors and Hyundai currently
16 offer passenger vehicles with ranges that are over 250 miles. However, General
17 Motors announced that it has developed a new electric vehicle battery with a range of
18 up to 400 miles. A few years ago, it was difficult to find a plug-in electric vehicle
19 with a range greater than 100 miles. It is reasonable to expect that the battery range
20 will continue to improve.

21 The *third impediment* is the life of the battery. This is yet another area in which
22 the automotive industry is making major improvements. The batteries in all electric

1 vehicles sold in the United States are covered under warranties for at least 8 years or
2 100,000 miles. However, it is expected that electric vehicle batteries will last longer
3 than 100,000 miles. For example, Tesla recently announced that a 1,000,000 mile
4 battery is ready for production. Long-lived batteries along with charging ranges
5 greater than 500 miles will likely be game changers for the adoption of plug-in electric
6 vehicles.

7 The *fourth impediment* to the adoption of plug-in electric vehicles is the
8 availability of fast charging stations. While technological advances in the automobile
9 industry are addressing the first three impediments, from a public policy perspective,
10 the availability of fast charging stations may represent the most formidable challenge
11 to the adoption of plug-in electric vehicles. Even with battery ranges greater than 500
12 miles, there will be a public need for the availability of fast charging stations in order
13 to facilitate the adoption of plug-in electric vehicles. Without the availability of fast
14 charging stations, it is unlikely that passenger vehicle owners will be willing to
15 purchase a plug-in vehicle without the prospects for charging their vehicles on long
16 distance trips. Without more fast charging stations, electric vehicles will likely be
17 limited in their use to commuter vehicles and will thus be demoted to use as a
18 *secondary passenger vehicle*, forcing people to own a vehicle with an internal-
19 combustion engine to serve as their *primary passenger vehicle*. Thus, fast charging
20 stations are a *key enabling technology* that will allow people to purchase electric
21 passenger vehicles.

22 **Q. From a public policy perspective, why is it important for utilities to provide fast**

1 **charging service?**

2 A. As mentioned earlier, there are enormous benefits to customers adopting electric
3 vehicle technology. Electric vehicles are not only less costly to operate, the revenues
4 generated by charging electric vehicles have the effect of lowering rates to other
5 customers, by spreading utility fixed costs over a larger sales volume. Therefore, it
6 is in ratepayers’ interests for more people to use electric vehicles, providing ratepayer
7 and public benefits that go well beyond the lower operating cost of electric vehicles.
8 The need for electric utilities to install electric vehicle charging infrastructure is
9 addressed in the report *Electric Vehicles: Key Trends, Issues, and Considerations for*
10 *State Regulators* prepared by NARUC and sponsored by the United States Department
11 of Energy (DOE), which explains:

12 Many utilities around the country have begun to explore owning and
13 operating EV charging stations to accelerate the growth of EVs and
14 the corresponding growth in electric sales. Proponents of utility
15 ownership present several arguments in favor: Most experts agree
16 that current EV charging infrastructure will need to grow
17 dramatically to cover the expected growth of EVs. This large
18 “infrastructure gap” demands all hands on deck, including
19 participation of utilities. Furthermore, widespread charging
20 infrastructure is a prerequisite for many consumers to consider
21 purchasing an EV, but it is difficult for EVs to be profitable without
22 high usage from many EVs on the road. (*Id.*, at p. 20. Emphasis
23 supplied.)
24
25

26 According to this assessment, electric utilities will have to serve as providers of fast
27 charging service until the number of electric vehicles on the roads make it feasible for
28 private industry such as filling stations along interstates and highways like Pilot,

1 Flying J, Loves, TA, RaceTrac, Murphy USA, and others to begin installing DC Fast
2 Charging ports in larger numbers.

3 **Q. Nationally, is there a correlation between the number of DC Fast Charging Ports
4 and the number of plug-in electric vehicles owned?**

5 A. Yes. There is a 98.7% correlation between the number of DC Fast Charging Ports and
6 electric vehicles in a state. As can be seen from the graph shown in Exhibit WSS-10,
7 the relationship is essentially linear. While it is impossible to prove causality from
8 this analysis, the relationship does strongly suggest that DC Fast Charging Stations
9 are an essential enabling technology for the adoption of plug-in electric vehicles.

10 **Q. Do other utilities in our region offer DC Fast Charging Service?**

11 A. Yes. Georgia Power currently owns and operates 39 DC Fast Charging stations. In
12 June 2020, the Governor of Florida, Ron DeSantis, signed a directive for the Florida
13 Public Service Commission to encourage utilities to develop electric charging stations
14 along state highways. In July, Florida announced that 34 DC Fast Charging stations
15 would be added along Interstate 95, Interstate 4, Interstate 75, Interstate 275, and
16 Interstate 295.

17 **Q. Please describe the proposed pricing structure for DC Fast Charging Service.**

18 A. KU and LG&E are proposing to charge \$0.25 per kWh for charging service under Rate
19 EVC-FAST.

20 **Q. How does this rate compare to the average rate for Level 2 charging service that
21 the Companies currently charge under Rate EVC?**

22 A. The Level 2 charging service rate under Rate EVC has a different pricing structure

1 than what the Company is proposing for DC Fast Charging Service. Under Rate EVC,
2 which was approved in the Companies' last rate cases, KU and LG&E charge a fee of
3 \$0.75 for the first hour of charging service and \$1.00 for all additional hours during
4 the charging session, plus appropriate taxes and fees. On average this is equivalent to
5 \$0.20 per kWh after taxes and fees. A recent study has found that the majority of
6 respondents who have an electric vehicle or are considering purchasing one are willing
7 to pay 25% more for fast charging in relation to Level 2 charging service provided
8 under Rate EVC.²³ Therefore, in the industry, the charge for DC Fast Charging
9 Service (Level 3 service) is typically higher than the charge for Level 2 charging
10 service.

11 **Q. How does the charge for service under the Companies' proposed Rate EVC-**
12 **FAST compare to the DC Fast Charging Service offered by other utilities?**

13 A. Although I have not performed an exhaustive review of all DC Fast Charging rates
14 charged by utilities, several electric utilities providing service in Eastern United States
15 (i.e., east of the Mississippi River) offer DC Fast Charging Service. The following
16 table (TABLE 4) summarizes the charges per kWh for the utilities that I am aware of
17 in Eastern United States that provide DC Fast Charging Service:

18
19
²³ See <https://www.esource.com/429201ebtf/ev-charging-and-pricing-what-are-consumers-willing-pay>, dated
September 20, 2020.

1

2

TABLE 4

| Utility | DC Fast Charging Rate |
|---|------------------------------|
| Baltimore Gas and Electric Company (BG&E) | \$0.255 to \$0.34 per kWh * |
| Duke Energy Carolinas | \$0.236 per kWh ** |
| Florida Power & Light (FPL) | \$0.30 per kWh |
| Georgia Power Company | \$0.30 per kWh *** |
| Potomac Electric Power Company (PEPCO) | \$0.255 to \$0.34 per kWh |

* Customers with 5 or more vehicles operating in the utility's service territory are eligible for a 25% discount.

** Rate is adjusted quarterly to reflect the average price charged in the service territory.

*** Georgia Power charges \$0.25 per hour, which is equivalent to approximately \$0.30 per kWh for charging at its DC Fast Charging Stations.

3

4

As seen in this table, KU and LG&E's proposed charge for DC Fast Charging Service

5

is in line with what is being charged by these other utilities.

6 **Q.**

Based on your review of the filings submitted to state regulatory commissions by these utilities, were these DC Fast Charging rates supported by a cost analysis?

7

8 **A.**

No. In developing the rates, the rate filings reflected market considerations rather than costs. Due to the uncertainty regarding future usage of DC Fast Charging Service any such cost analysis would be speculative. As more data is collected over time, a better picture of the actual unit cost of providing this service will emerge. But regardless, as discussed earlier, because of the benefits that the availability of fast charging stations provide as an enabling technology, it is important that more fast charging stations are available for public use. It is important to recognize that KU and LG&E are not trying to compete with third-party providers of DC Fast Charging

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1 service, and the Companies are not trying to undercut other providers by providing a
2 below market price for fast charging service. More fast charging stations are needed
3 to enable people to purchase electric vehicles. A thriving market for fast charging
4 service will enable more customers to drive electric vehicles and thereby benefit KU
5 and LG&E's existing customers by putting downward pressure on electric rates.

6 **Q. You mentioned earlier that adjustments to miscellaneous revenues are being**
7 **made to ensure that costs related to Level 2 charging under Rate EVC are not**
8 **shifted to other customers. Are similar adjustments being made for DC Fast**
9 **Charging Service?**

10 A. No, nor are such adjustments necessary in these proceedings. As mentioned earlier,
11 there are no costs related to the DC Fast Charging in test-year revenue requirements.
12 Because test year revenue requirements do not include costs related to the DC Fast
13 Charging Service, such an adjustment is neither necessary nor possible. The revenue
14 requirement treatment of future investments in DC Fast Charging Stations will be
15 addressed in subsequent rate proceedings. In these proceedings, the Companies are
16 requesting approval of rates for DC Fast Charging Service that will be available to the
17 public beginning during the second half of 2022. Consequently, none of the costs for
18 this service is included in test year revenue requirements in these proceeding.

19 **Q. Are the Companies proposing any changes to Electric Vehicle Supply Equipment**
20 **Rate EVSE and EVSE-R?**

21 A. Yes. Under Electric Vehicle Supply Equipment – Rider (Rider EVSE-R), the
22 Companies provide charging stations behind the customers' meters which can be used

1 by the customers to charge electric vehicles. Under Rider EVSE-R, the customer is
2 responsible for providing the electric energy for the charging station and the
3 Companies bill the customers a monthly fixed charge for the use of the charging
4 station. Pursuant to Rate EVSE, the Companies provide an unmetered charging station
5 which can be used by customers to charge electric vehicles. Under this rate schedule,
6 the Companies provide the energy for the charging station, the cost of which is
7 bundled into the monthly fixed charge. The Companies are proposing to add an
8 additional charging unit option to the EVSE and EVSE-R tariff. The new charging
9 unit is a basic non-networked charger that is preferred by some customers. The
10 addition of this unit is not meant to compete with or replace the existing charging unit,
11 but to supplement the options available to KU and LG&E's customers. Cost Support
12 for the new EVSE and EVSE-R rates are shown in Exhibit WSS-11.

13

14 **Q. REDUNDANT CAPACITY (RIDER RC)**

15 **Q. Please describe the Companies' Redundant Capacity rider.**

16 A. The Redundant Capacity rider allows customers that have one or more redundant
17 distribution feeds to reserve back-up capacity on the distribution system. This rider
18 would typically be used by customers, such as hospitals, who want greater assurance that
19 their service will not be interrupted because of an outage on a distribution line. These
20 customers would want a redundant feed along with automatic relay equipment capable
21 of switching from a principal circuit to a backup circuit if electric service from the

1 primary feed is lost. With the greater use of technology, some customers are finding it
2 increasingly difficult to tolerate electrical outages for even short periods of time.

3 **Q. How is a customer charged for redundant capacity?**

4 A. A customer who wants a second feed must pay the cost of the customer-specific facilities
5 required to provide the feed, including the second distribution line, automatic relay
6 equipment, or other customer-specific facilities that may be required. Customers can pay
7 for the customer-specific facilities by either making a contribution-in-aid-of-construction
8 or by taking service under the Excess Facilities rider. To provide a customer full backup
9 capacity on a second feed, the Companies must incur additional costs to ensure sufficient
10 network distribution capacity for full backup if a relay occurs on the automatic
11 switchgear. To ensure that there is sufficient capacity on the redundant feed to serve the
12 load if the primary feed goes down, the utility must plan the distribution facility as if
13 there were two customers placing demands on the system. For this reason, the
14 Companies assess a demand charge to cover the distribution demand-related cost of
15 providing backup service for customers with redundant feeds. The demand charge is
16 applied to the customer's monthly billing demand determined under the standard rate
17 schedule under which the customer receives electric service. Rider RC includes a charge
18 for customers taking service at primary voltages and a charge for customers taking
19 service at secondary voltages.

20 **Q. What changes are the Companies proposing to the Redundant Capacity charges?**

21 A. KU is proposing to decrease the demand charge for primary voltage customers from
22 \$0.99 to \$0.92 per kW per month and to increase the charge from \$1.16 to \$1.36 per kW

1 per month for secondary voltage customers. LG&E is proposing to decrease the demand
2 charge for primary voltage customers from \$1.41 to \$1.31 per kW per month and to
3 increase the charge from \$1.84 to \$1.93 per kW per month for secondary voltage
4 customers. The cost support for the proposed redundant capacity charges is included in
5 Exhibit WSS-12.

6

7 **IV. GAS RATE DESIGN AND THE ALLOCATION OF THE INCREASE**

8 **A. ALLOCATION OF THE GAS REVENUE INCREASE**

9 **Q. Please summarize your recommendations for allocating the gas revenue increase**
10 **to the classes of service?**

11 A. LG&E is proposing an overall revenue increase of \$29,988,054 for its gas line of
12 business, which corresponds to an 8.34% increase. LG&E is also proposing changes
13 to other miscellaneous charges which result in changes to other operating revenue.
14 Accounting for changes in other operating revenue results in increases in revenues
15 from sales to ultimate customers of \$29,979,285 (or 8.37%) for LG&E's gas
16 operations. (See Schedule M 2.1-G in LG&E's Filing Requirements.)

17 I relied on the results of the gas cost-of-service study to develop my
18 recommendations for allocating the gas revenue increase to the classes of service. As
19 seen in the table below (TABLE 5), the class rates of return for As-Available Gas
20 Service (Rate AAGS) and Firm Transportation Service (Rate FT) are significantly
21 lower than for the other rate classes. I am recommending the elimination of 25% of

1 the subsidies for Rates Residential Gas Service (RGS), AAGS, and FT. Because of
2 its high rate of return, I am not recommending an increase for Rate IGS. Rate CGS is
3 adjusted to collect the residual increase required to yield the overall increase.
4 Specifically, as shown on Schedule M-2.1-G, I am recommending revenue increases
5 of 9.37% for Rate RGS, 4.86% for Rate CGS, 26.09% for Rate AAGS, 39.75% for
6 Rate FT, and no increase for Rate IGS.

7 It should be noted, however, that the percentage increase for Rate FT is
8 somewhat misleading. The revenues for Rates RGS, CGS, IGS, and AAGS include
9 recovery of the cost of the natural gas (the commodity), but Rate FT is a transportation-
10 only service. Therefore, the recovery of the cost of the natural gas is not included in
11 Rate FT revenues, which inflates the percentage increase for this class. If a proxy
12 price of \$3.42 per Mcf is assumed as the cost that Rate FT customers pay for natural
13 gas, which reflects LG&E's average Gas Supply Cost Component during the test year,
14 the effective increase that Rate FT customers would see in their total natural gas costs
15 due to LG&E's proposed rate increase would only be 5.56%, which is not significantly
16 higher than the increase that LG&E is proposing for Rate CGS. A comparison of the
17 rate of return at current rates and the percentage revenue increase (decrease) proposed
18 for each rate class is shown below in TABLE 5:

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20
21
22

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TABLE 5

| Rate Class | Rate of Return On Rate Base | Customer Increase in Cost of Gas * | Rate of Return On Rate Base After Increase |
|-------------------------------------|--|---|---|
| Residential Service Rate RGS | 4.62% | 9.37% | 6.87% |
| Commercial Service Rate CGS | 7.56% | 4.86% | 9.08% |
| Industrial Service Rate IGS | 13.70% | 0.00% | 13.69% |
| As Available Gas Service Rate AAGS | -3.24% | 26.09% | 0.98% |
| Firm Transportation Service Rate FT | -1.75% | 5.56% | 2.10% |
| Total | 5.10% | 7.58% | 7.23% |

3

* The increase shown for Rate FT reflects a proxy price for the customer's natural gas of \$3.42 per Mcf.

4

The rates of return for each rate class are shown in Exhibit WSS-13, and the revenue

5

increases necessary to eliminate 25% of the subsidies for Rates RGS, FT and AAGS

6

are calculated in Exhibit WSS-14.

7 **Q.**

Is LG&E proposing to eliminate all subsidies?

8 A.

No. As mentioned above, LG&E's proposal is to eliminate 25% of the subsidies for

9

Rates FT, AAGS, and RGS. This approach moderates the large increase that would

10

otherwise be required to bring the rates of return for Rates FT, AAGS, and RGS to the

11

proposed overall rate of return.

12 **Q.**

Has Rate FT increased significantly since it was first introduced?

13 A.

No. Rate FT has increased very little since it was first introduced in 1995. Rate FT

14

replaced a similar service called Rate T, which was introduced in 1988. The

15

distribution charge for Rate T was \$0.43 per Mcf when it was first introduced in

1 1988.²⁴ Rate T was replaced with Rate FT in 1995, but the distribution charge of \$0.43
2 per Mcf remained the same.²⁵ Rate FT was not increased until July 1, 2015, when the
3 charge was raised from \$0.43 per Mcf to \$0.4302 per Mcf.²⁶ Rate FT was increased
4 again on July 1, 2017, from \$0.4302 per Mcf to \$0.4440 per Mcf.²⁷ The distribution
5 charge was restructured as a demand/commodity rate in Case No. 2018-00295;
6 however, the modification in that proceeding was designed to be revenue neutral.
7 Therefore, during a period of over 32 years, the distribution charge for Rate FT (or its
8 predecessor, Rate T) has only increased a *total* of 3.26%.

9 **Q. What is creating the need for rate increases for Rates FT and AAGS?**

10 A. As discussed in detail in Mr. Bellar’s testimony, LG&E obtained approval from the
11 Commission to modernize its gas transmission system. This Transmission
12 Modernization Program (“TMP”) and other modifications to LG&E’s gas
13 transmission pipelines, such as the planned modification to the Western Kentucky A
14 and B pipelines, represent a commitment on the part of LG&E to invest in the
15 replacement of aging gas transmission infrastructure. Prior to these transmission
16 projects, LG&E had focused primarily on upgrading its distribution infrastructure.
17 The investment that LG&E made to replace distribution infrastructure did not have a

²⁴ Rate T was implemented in 1988 pursuant to the Commission’s Order in Case No. 10064 (Ky. P.S.C. Jul. 1, 1988).

²⁵ In 1995, Rate FT replaced Rate T, which also included a distribution charge of \$0.43. *See The Tariff Filing of Louisville Gas and Electric Company to Modify Firm Transportation Service Tariff*, Case No. 95-037, Order (Ky. P.S.C. Jun. 27, 1995).

²⁶ Case No. 2014-00372, Order (Ky. P.S.C. Jun. 30, 2015).

²⁷ Case No. 2016-00371, Order (Ky. P.S.C. Jun. 29, 2017).

1 major impact on the cost of providing service to customers taking service under Rates
2 FT and AAGS. Customers served under Rates FT and AAGS are allocated relatively
3 little of the cost of distribution infrastructure. This is not the case with transmission
4 infrastructure. Because transmission costs make up a significantly larger portion of
5 the total cost of service to Rate FT and Rate AAGS customers, TMP and other
6 modifications to LG&E's gas transmission system have increased the cost of service
7 to these two rate classes.

8 **Q. Are there any rate classes not shown on the above table?**

9 A. Yes. Rate VFD is not broken out in the cost-of-service study but is included with Rate
10 RGS. Distributed Generation Gas Service (Rate DGGs) is a rate class that serves a
11 small number of customers. It is a demand/commodity rate that is derived from unit
12 costs from the cost-of-service study for Rate IGS. Rate DGGs is not broken out in
13 the cost-of-service study but is included in Rate IGS in the study, as is the Companies'
14 special contract with LG&E to provide gas sales service to the Mill Creek Generating
15 Station. Local Gas Delivery Service (Rate LGDS) is a rate for the transportation of
16 locally produced natural gas through LG&E's delivery system. Rate LGDS has the
17 same rate structure and unit charges as Rate FT. There are currently no customers
18 served under Rate LGDS.

19 Substitute Gas Sales Service (Rate SGSS) is a rate available to serve customers
20 that desire substitute gas sales service from LG&E. It is a demand/commodity rate
21 that is derived from unit costs from the cost-of-service study based on either Rate CGS
22 or Rate IGS, as applicable. One commercial customer is served under Rate SGSS.

1 Therefore, Rate SGSS is not broken out separately in the cost-of-service study but is
2 included in Rate CGS.

3 **Q. Have you prepared an exhibit showing the proposed gas revenue increase for**
4 **each rate schedule?**

5 A. Yes. The revenue increase for each rate class is shown on Schedule M-2.1-G of
6 Section 16(8)(m) of the Filing Requirements. The detailed billing calculations and
7 proposed unit charges for each rate schedule are shown on Schedule M-2.3-G.

8

9 **B. ELIMINATION OF GAS LINE TRACKER PROGRAMS**

10 **Q. Is LG&E proposing to eliminate certain Gas Line Tracker (GLT) projects?**

11 A. Yes. LG&E is proposing to eliminate the Main Replacements portion of the Leak
12 Mitigation Project, the Aldyl-A Mains and Services Replacement Project, and the
13 Steel Customer Service Lines and Targeted Removal of County Loops and Steel
14 Curbed Services Program (“Steel Services Program”), and Transmission
15 Modernization Program (“TMP”). Except for the Steel Services Program, all work on
16 the eliminated projects has been or will be completed before to the end of the test year.
17 The Steel Service Program and the Transmission Modernization Program were only
18 authorized for GLT recovery for a period of five years, which corresponds to the end
19 of the test year.

20 **Q. Will the costs of these eliminated GLT projects be recovered through base rates**
21 **instead of the GLT?**

22 A. Yes. The impact of the elimination of these programs are also shown in Schedule M-

1 2.3-G. Specifically, on page 1 of this Schedule, the column labeled “GLT Mechanism
2 Adjustment to Reflect GLT Project Elimination” reflects the amount of GLT
3 Mechanism revenue transferred to base rates. This adjustment *does not* alter total
4 revenue, but simply represents the removal of GLT costs for the eliminated projects
5 from the GLT mechanism into base rate recovery. This adjustment is revenue neutral.
6 The supporting details for each rate class are shown on pages 2 through 11 of Schedule
7 M-2.3-G.

8

9 **C. RESIDENTIAL GAS SERVICE (RATE RGS)**

10 **Q. Please provide a brief description of Rate RGS.**

11 A. Rate RGS is the standard gas rate schedule available to single-family residential
12 service. Approximately 301,000 residential customers are served under this rate
13 schedule. Rate RGS consists of a Basic Service Charge, Distribution Charge and Gas
14 Supply Cost Component.

15 **Q. What are the charges that LG&E is proposing for Rate RGS?**

16 A. LG&E is proposing to increase the Basic Service Charge from \$0.65 per day to \$0.78
17 per day. The Company is also proposing to increase the Distribution Charge from
18 \$0.36782 per Ccf to \$0.48398 per Ccf. LG&E is proposing the same charges for
19 Volunteer Fire Department Service (Rate VFD).

20 **Q. What is the basis for the proposed increase in the Basic Service Charge for Rate
21 RGS?**

22 A. LG&E is proposing a Basic Service Charge that moves the Basic Service Charge

1 towards the customer-related costs from the cost-of-service study. As will be
2 explained in greater detail later in my testimony regarding the gas cost-of-service
3 study, the methodology that is used to classify costs as customer-related corresponds
4 to the methodology that has been accepted by the Commission in prior rate case orders.

5 **Q. Have you prepared an exhibit showing the calculation of the unit cost**
6 **components for Rate RGS?**

7 A. Yes. Exhibit WSS-15 shows the calculation of the unit customer cost and distribution
8 delivery cost. From this exhibit, the customer cost is calculated to be \$0.98 per
9 customer per day, and the distribution delivery cost is \$0.37070 per Ccf. LG&E's
10 proposed Basic Service Charge of \$0.78 is approximately 79.6% of the unit customer-
11 related cost from the cost-of-service study. LG&E is proposing an increase in the
12 Basic Service Charge of approximately 25%, which reflects a gradual movement of
13 the charge towards cost of service.

14

15 **D. COMMERCIAL GAS SERVICE (RATE CGS)**

16 **Q. Please provide a brief description of Rate CGS.**

17 A. Rate CGS is the standard gas rate schedule available to commercial customers for gas
18 sales service. Approximately 25,700 commercial customers are served under this rate
19 schedule. Rate CGS consists of a Basic Service Charge, Distribution Charge and Gas
20 Supply Cost Component. The Basic Service Charge is differentiated between
21 customers who do not have a meter with a capacity equal to or greater than 5,000 cubic

1 feet per hour (cf/hr) and customers who do have at least one meter with a capacity
2 equal to or greater than 5,000 cf/hr.

3 **Q. What are the charges that LG&E is proposing for Rate CGS?**

4 A. LG&E is proposing to increase the Basic Service Charge from \$1.97 per day to \$2.30
5 per day for customers who do not have a meter with a capacity equal to or greater than
6 5,000 cf/hr and to increase the charge from \$9.37 per day to \$11.00 per day for
7 customers who do have at least one meter with a capacity equal to or greater than
8 5,000 cf/hr. LG&E is proposing to increase the Distribution Charge from \$0.30670
9 to \$0.37688 per Ccf for on-peak usage and from \$0.25670 to \$0.32688 per Ccf for off-
10 peak usage.

11

12 **E. INDUSTRIAL GAS SERVICE (RATE IGS)**

13 **Q. Please provide a brief description of Rate IGS.**

14 A. Rate IGS is the standard gas rate schedule available to industrial customers for gas
15 sales service. Approximately 200 industrial customers are served under this rate
16 schedule. Rate IGS consists of a Basic Service Charge, Distribution Charge and Gas
17 Supply Cost Component. The Basic Service Charge is differentiated on the same basis
18 as Rate CGS.

19 **Q. What are the charges that LG&E is proposing for Rate IGS?**

20 A. LG&E is not proposing a revenue increase for Rate IGS. However, Distribution Cost
21 Components of Rate IGS are being adjusted to reflect the elimination of certain GLT
22 projects and the transfer of cost recovery of the GLT project costs to base rates. To

1 reflect the elimination of the GLT projects, LG&E is proposing to increase the
2 Distribution Charge from \$0.21929 to \$0.27023 per Ccf for on-peak usage and from
3 \$0.16929 to \$0.22023 per Ccf for off-peak usage. Again, this change is revenue
4 neutral because there will be a corresponding reduction in the GLT.

5

6 **F. AS AVAILABLE GAS SERVICE (RATE AAGS)**

7 **Q. Please provide a brief description of Rate AAGS.**

8 A. Rate AAGS is the rate schedule available to commercial and industrial customers that
9 agree to take gas sales service on a non-firm basis. There are only three customers
10 on this rate schedule. Rate AAGS consists of a Basic Service Charge, Distribution
11 Charge and Gas Supply Cost Component.

12 **Q. Is LG&E proposing changes to Rate AAGS?**

13 A. Yes. LG&E is proposing to increase the Basic Service Charge from \$500.00 per
14 month to \$630.00 per month and to increase the Distribution Charge from \$1.0644 to
15 \$2.0168 per Mcf.

16

17 **G. FIRM TRANSPORTATION SERVICE (RATE FT)**

18 **Q. Please provide a brief description of Rate FT.**

19 A. Rate FT is the standard gas rate schedule available to large commercial and industrial
20 customers for firm gas transportation service. It is generally available to customers
21 who use at least 50 Mcf per day at each delivery point. Rate FT currently includes an
22 Administrative Charge of \$550.00 per delivery point per month, a Basic Service

1 Charge of \$750.00 per delivery point per month, a Distribution Charge of \$0.0380 per
2 Mcf, and a Demand Charge of \$4.89 per Mcf of billing demand per month. The Basic
3 Service Charge is applied to each customer receipt point. The Demand Charge is
4 applied to the customer's monthly billing demand, which is the greater of the
5 Maximum Daily Quantity (MDQ) or the highest daily volume of gas delivered to the
6 delivery point during the current or preceding 11 monthly billing periods. The
7 Distribution Charge is applied to the volumes of gas (Mcf) delivered to the customer
8 at its facility. LG&E's largest gas customers receive service under this rate schedule.

9 **Q. Is LG&E proposing changes to Rate FT?**

10 A. Yes. LG&E is proposing to increase the Distribution Charge to \$0.0456 per Mcf and
11 the Demand Charge to \$7.78 per Mcf of billing demand per month.

12

13 **H. SUBSTITUTE GAS SALES SERVICE (RATE SGSS)**

14 **Q. Please describe Rate SGSS.**

15 A. Rate SGSS is a standard rate schedule that provides substitute gas sales service for any
16 customer who desires to receive firm sales service from LG&E in addition to gas
17 received from other sources with which the customer is physically connected. This
18 rate therefore applies to customers who normally receive gas supply directly from an
19 interstate pipeline, another local distribution company, or a local producer but desire
20 to rely on LG&E as an alternative or substitute supplier of natural gas.

21 **Q. Please describe the proposed charges for Rate SGSS.**

22 A. For commercial customers served under Rate SGSS, LG&E is proposing a Basic

1 Service Charge of \$335.00 per month, a Demand Charge of \$7.54 per Mcf of Monthly
2 Billing Demand, and a Distribution Charge of \$0.4106 per Mcf. The increase in the
3 revenue for this class corresponds approximately to the increase for Rate CGS. One
4 commercial customer takes service under Rate SGSS.

5 For industrial customers served under Rate SGSS, LG&E is proposing a Basic
6 Service Charge of \$750.00 per month, a Demand Charge of \$10.89 per Mcf of
7 Monthly Billing Demand, and a Distribution Charge of \$0.3100 per Mcf. Currently,
8 no industrial customers take service under Rate SGSS.

9

10 **I. LOCAL GAS DELIVERY SERVICE (RATE LGDS)**

11 **Q. Please describe Rate LGDS.**

12 A. Rate LGDS is a rate schedule that is available to parties who contract with LG&E to
13 provide firm transportation service of locally produced gas. Currently, there are no
14 customers served under Rate LGDS.

15 **Q. Please describe the rate components for Rate LGDS and cost basis for the**
16 **charges.**

17 A. Rate LGDS currently includes an Administrative Charge of \$550.00 per month, Basic
18 Service Charge of \$750.00 per month, a Demand Charge of \$4.89 per Mcf, and a
19 Distribution Charge of \$0.0380 per Mcf. The Administrative Charge and Basic
20 Service Charge are applied to each customer receipt point. The Demand Charge is
21 applied to the customer's monthly billing demand, which is the greater of the
22 Maximum Daily Quantity (MDQ) or the highest daily volume of gas delivered to the

1 delivery point during the current or preceding 11 monthly billing periods. The
2 Distribution Charge is applied to the net nominated volumes of gas (Mcf) at the
3 delivery point. LG&E is proposing the same charges for Rate LGDS as Rate FT as
4 previously described because the type of transportation service provided under these
5 two rate schedules is essentially similar. LG&E is proposing to increase the
6 Distribution Charge to \$0.0456 per Mcf and the Demand Charge to \$7.78 per Mcf of
7 billing demand per month.

8

9 **J. DISTRIBUTED GENERATION GAS SERVICE (RATE DGGS)**

10 **Q. Please describe Rate DGGS.**

11 A. Rate DGGS is a rate schedule that is available to parties with customer-owned electric
12 generation facilities who require natural gas service.

13 **Q. Is LG&E proposing any modifications to the charges for Rate DGGS?**

14 A. Yes. LG&E is proposing to increase the Distribution Charge from \$0.2992 to \$0.3100
15 per Mcf and to decrease the Demand Charge from \$10.8978 to \$10.89.

16

17 **VI. MISCELLANEOUS SERVICE CHARGES**

18 **A. POLE AND STRUCTURE ATTACHMENT CHARGES (RATE PSA)**

19 **Q. Are KU and LG&E proposing to increase the pole and structure attachment**
20 **charges set forth in Rate PSA?**

21 A. No. The Companies are proposing to maintain the pole attachment charge applicable

1 to cable television operators and telecommunication carriers at the current annual
2 levels of \$7.25 per wireline attachment, \$0.81 per linear foot of duct, and \$36.25 per
3 wireless facility located on the top of a pole. Of the three charges, the wireline
4 attachment charge has by far the greatest utilization. Currently, there are minimal
5 wireless and duct attachments.

6 **Q. Did you validate the reasonableness of the current wireline attachment charge?**

7 A. Yes. When I calculated the wireline attachment charge using forecasted costs based
8 on a revenue requirement reflecting net cost plant (net cost rate base), the analysis
9 resulted in a unit cost for KU and LG&E of \$7.84 per attachment. Because the current
10 charge reasonably reflects the updated cost based on forecasted net plant, the
11 Companies decided not to propose a change in the rates at this time.

12 **Q. Please describe the methodology used to calculate the charges.**

13 A. In its Order in Administrative Case No. 251, the Commission prescribed a
14 methodology for determining the attachment charges. The calculations set forth in
15 Exhibit WSS-16 follow the guidelines established in Administrative Case No. 251. In
16 this exhibit, the weighted average carrying costs are calculated for 35-, 40- and 45-
17 foot poles. The charge is calculated by multiplying a usage factor of 0.0759 by the
18 annual carrying costs of a bare pole. The 0.0759 usage factor was the prescribed
19 percentage for a three-user pole set forth in the Commission's Order in Administrative
20 Case No. 251 dated September 17, 1982, and assumes that a cable television
21 attachment would utilize one foot of the usable space on the pole. In calculating bare
22 pole costs, 15% of the pole costs have been removed from plant in service costs for

1 35-, 40- and 45-foot poles to reflect the elimination of appurtenances.

2 **Q. How are the carrying charges calculated?**

3 A. They are calculated using a standard revenue requirement (cost of service)
4 methodology. The carrying charges include the following cost-of-service
5 components: (1) return on net investment (rate base), (2) income taxes, (3)
6 depreciation expenses, (4) O&M expenses, and (5) property taxes. These are the
7 standard items included in a utility's revenue requirements.

8 **Q. Are the charges based on net depreciated plant?**

9 A. Yes. Net depreciated plant (or rate base), along with straight line depreciation, is used
10 in the carrying charge calculation. This approach is consistent with the way that all
11 other revenue requirements are determined in these proceedings. Therefore, the
12 charges shown in Exhibit WSS-16 are reflective of current revenue requirements
13 associated with the cost of providing attachment service.

14

15 **B. NON-RESIDENTIAL LATE PAYMENT CHARGES**

16 **Q. Are the Companies proposing to modify policies related to their late payment**
17 **charges?**

18 A. Yes. The Companies are proposing to waive a non-residential customer's late
19 payment charge if the customer requests a waiver and has not incurred a late payment
20 charge in the previous 11 billing cycles. The Companies implemented a similar policy
21 for residential customers in their last rate cases.

22 **Q. Are the Companies making an adjustment to miscellaneous revenues to reflect**

1 **the waiver?**

2 A. No. The Companies will absorb the impact of the waiver until any future rate cases,
3 at which time the impact of the change would be reflected in test year miscellaneous
4 revenues in such future rate cases.

5

6 **C. EXCESS FACILITIES CHARGES**

7 **Q. Please describe the Companies' Excess Facilities Rider.**

8 A. The Excess Facilities Rider applies to customer requests for service arrangements
9 requiring equipment and facilities in excess of those the Companies would normally
10 install. Examples of excess facilities include requests for non-standard facilities such as
11 emergency backup feeds, automatic transfer switches, redundant transformer capacity,
12 and duplicate or check meters. Under the rider, customers have the option of either (i)
13 requesting that KU or LG&E incur the full cost of the equipment (including up-front
14 equipment cost), in which event the monthly excess facilities charge would cover the
15 expected carrying charges on the equipment, the estimated maintenance cost on the
16 equipment, and the estimated cost of replacing the equipment if it fails prior to the service
17 life of the facilities or (ii) making an up-front payment to cover the cost of the facilities,
18 in which event the monthly excess facilities charge would only cover the estimated
19 maintenance cost on the equipment and the estimated cost of replacing the facilities if
20 they fail prior to the expected service life of the equipment. Because estimated failure
21 costs would be included in the charge for either scenario, KU or LG&E would replace
22 the equipment if it fails prior to the end of the specified service life under either option.

1 **Q. What are the proposed excess facilities charges?**

2 A. Under the first option, in which the Companies would make the up-front investment, the
3 proposed monthly charges as a percentage of the original cost of the facilities are 1.17
4 percent for KU, 1.23 percent for LG&E's electric operations, and 1.15 percent for
5 LG&E's gas operations. These are slight changes from the current charges of 1.16
6 percent for KU, 1.22 percent for LG&E's electric operations, and 1.15 percent for
7 LG&E's gas operations.

8 Under the second option, in which the customer makes the initial up-front
9 investment, the proposed monthly charges as a percentage of the original cost of the
10 facilities are 0.47 percent for KU, 0.52 percent for LG&E's electric operations, and 0.45
11 percent for LG&E's gas operations. These are unchanged from the current charges.

12 **Q. How are the excess facilities charges calculated?**

13 A. For the first option, in which LG&E makes the up-front investment, the charge includes
14 (i) the levelized carrying charges associated with both the original cost of the facilities
15 and the present value of the expected replacement cost of the facilities, plus (ii) operation
16 and maintenance expenses as a percentage of the original cost of the plant. The levelized
17 carrying charge rate is calculated using an 8.43 percent cost of capital for KU and an 8.38
18 percent cost of capital for LG&E for the estimated 30-year recovery period for long-lived
19 distribution property. The present value of the expected replacement costs is determined
20 using an actuarial approach based on Iowa-type survivor curves, which are the survival
21 frequency distributions developed by Iowa State University that are used in depreciation
22 studies for electric and gas utilities throughout the U.S. Specifically, the present value

1 replacement cost is determined by calculating the replacement cost for each year based
2 on the failure percentage given by a specified survivor curve and adjusted to reflect a
3 three percent inflation factor. A 30-year R-2 Iowa curve is used to determine the annual
4 replacement percentages. This curve is typical of an Iowa curve that might be used for
5 transformers and other distribution facilities.

6 For the second option, in which the customer makes the initial up-front
7 investment, the charge includes (i) the levelized carrying charges associated with the
8 present value of the expected replacement cost of the facilities, plus (ii) operation and
9 maintenance expenses as a percentage of the original cost of plant. Therefore, under this
10 option, the charge would not include the carrying charges associated with the initial cost
11 of the facilities but would include carrying charges on the present value of the
12 replacement cost.

13 For both options, the operation and maintenance component is determined by
14 dividing (i) actual operation and maintenance expenses less purchased power expenses
15 during the test year by (ii) electric plant in service as of the end of the test year. Cost
16 support for the proposed excess facilities charges is included in Exhibit WSS-17. The
17 impact on other operating revenues is shown in Exhibit WSS-18.

18

19 **D. OTHER MISCELLANEOUS CHARGES**

20 **Q. Are KU and LG&E proposing changes to any other miscellaneous charges?**

21 A. Yes. LG&E is proposing to increase its electric and gas disconnect/reconnect service
22 charges from \$28.00 to \$32.00, and KU is proposing to increase its

1 disconnect/reconnect service charge from \$28.00 to \$37.00. KU is proposing to
2 increase its returned check charge from \$3.00 to \$3.50, and LG&E proposing to
3 increase its returned check charge from \$3.00 to \$3.70. For electric meters, KU and
4 LG&E are proposing to increase the meter-test charge from \$75.00 to \$79.00. For gas
5 meters, LG&E is proposing to increase its meter-test charge from \$90.00 to \$101.00.
6 For gas service, LG&E is proposing to increase its inspection charge and its additional
7 trip charge from \$150.00 to \$155.00.

8 For electric meters, KU and LG&E are proposing to decrease the meter pulse
9 relay charge from \$24.00 to \$21.00. For gas meters, LG&E is proposing to increase
10 its meter pulse charge for transportation customers served under FT and TS2 from
11 \$7.17 to \$8.00 and from \$24.34 to \$28.00 for all other types of customers.

12 KU is proposing to modify the unauthorized reconnect charges as follows: (i)
13 from \$70.00 to \$45.00 for tampering or an unauthorized connection or reconnection
14 that does not require the replacement of the meter; (ii) from \$90.00 to \$66.00 for
15 tampering or an unauthorized connection or reconnection that requires the
16 replacement of a single-phase standard meter; (iii) from \$110.00 to \$87.00 for
17 tampering or an unauthorized connection or reconnection that requires the
18 replacement of a single-phase Automatic Meter Reading (AMR) meter; (iv) from
19 \$174.00 to \$149.00 for tampering or an unauthorized connection or reconnection that
20 requires the replacement of a single-phase Advanced Metering Infrastructure (AMI)
21 meter; and (v) from \$177.00 to \$154.00 for tampering or an unauthorized connection
22 or reconnection that requires the replacement of a three-phase meter.

1 For electric service, LG&E is proposing to modify the unauthorized reconnect
2 charges as follows: (i) from \$70.00 to \$49.00 for tampering or an unauthorized
3 connection or reconnection that does not require the replacement of the meter; (ii)
4 from \$90.00 to \$70.00 for tampering or an unauthorized connection or reconnection
5 that requires the replacement of a single-phase standard meter; (iii) from \$110.00 to
6 \$91.00 for tampering or an unauthorized connection or reconnection that requires the
7 replacement of a single-phase Automatic Meter Reading (AMR) meter; (iv) from
8 \$174.00 to \$153.00 for tampering or an unauthorized connection or reconnection that
9 requires the replacement of a single-phase Advanced Metering Infrastructure (AMI)
10 meter; and (v) from \$177.00 to \$159.00 for tampering or an unauthorized connection
11 or reconnection that requires the replacement of a three-phase meter.

12 For gas service, LG&E is proposing to modify the unauthorized reconnect
13 charges as follows: (i) from \$70.00 to \$49.00 for unauthorized reconnects that do not
14 require the replacement of a meter, and (ii) from \$132.00 to \$114.00 for unauthorized
15 reconnects that require the replacement of a meter. The cost support for these charges
16 is shown in Exhibit WSS-19, and the impact on other operating revenues is shown in
17 Exhibit WSS-20.

18 **Q. Are KU and LG&E proposing AMI Opt-Out Charges?**

19 A. Yes. Mr. Conroy's testimony explains why the Companies are proposing the charges
20 and when they will apply.

21 **Q. What are the Companies' proposed AMI Opt-Out Charges?**

22 A. The Companies are also proposing an up-front opt-out setup charge per meter (\$39.00

1 for KU, \$35.00 for LG&E-E, and \$33.00 for LG&E-G) and a recurring monthly opt-
 2 out charge per meter (\$15.00 for KU, \$12.00 for LG&E-E, and \$5.00 for LG&E-G)
 3 applicable to customers who choose to opt out of the proposed Advanced Metering
 4 Infrastructure (AMI) deployment.

5 **Q. How do the Companies’ proposed AMI Opt-Out Charges compare to similar**
 6 **charges for other utilities?**

7 A. The following table (TABLE 6) shows the AMI opt-out charges for other utilities in
 8 the United States:

9 **TABLE 6**

| Utility | AMI Opt-out Set-up Fee | Monthly AMI Opt-Out Fee |
|---------------------------|-------------------------------|--------------------------------|
| Duke Energy Progress (NC) | \$170.00 | \$14.75 |
| Duke Energy Progress (SC) | \$170.00 | \$14.75 |
| Duke (KY) | \$100.00 | \$25.00 |
| Duke Energy (OH) | \$100.00 | \$30.00 |
| Duke Energy (FL) | \$96.34 | \$15.60 |
| AEP Michigan | \$80.30 | \$9.75 |
| Portland General | \$80.00 | \$17.00 |
| Duke Energy (IN) | \$75.00 | \$17.50 |
| AEP Ohio | \$43.00 | \$24.00 |
| Central Maine Power | \$40.00 | \$16.05 |

10
 11

12 The Companies’ proposed AMI opt-out charges are toward the bottom end of the
 13 charges assessed by other utilities.

14 **Q. What costs are recovered through the proposed charges?**

15 A. The one-time charge includes: (i) the cost of creating work orders for meter change-

1 out and the routing of meter readers, (ii) travel time, transportation cost and direct
2 costs to remove the AMI electric meters or gas modules and replace them with non-
3 AMI meters or gas modules; and (iii) customer service administrative costs.

4 The recurring charge includes the following costs: (i) costs for meter readers,
5 dispatchers, supervisors, and transportation costs; (ii) costs, including transportation
6 costs, for manual off-cycle meter reads by meter readers and fields services employees
7 necessary to perform meter readings services for non-AMI meters; (iii) on-going
8 maintenance costs related to the incremental mesh network; (iv) the cost of additional
9 relays, access point, and supporting infrastructure related to the AMI mesh network;
10 (v) system updates, staff training, and testing of billing system to handle opt out
11 requests; and (vi) updating the billing system to handle AMI opt out billing, including
12 system testing and training of staff.

13 Because the vast majority of LG&E's gas customers also receive electric
14 service from LG&E, the travel time and cost for manually reading the non-AMI meters
15 were reduced in calculating the cost of the AMI opt-out for gas customers, thus
16 resulting in a lower opt-out charge for LG&E's gas customers than for its electric
17 customers. These considerations do not impact the one-time charge for gas AMI opt-
18 out. This ensures that combination gas and electric customers served by LG&E will
19 not be overcharged. For LG&E's gas customers not taking electric service from either
20 LG&E or KU, non-AMI telemetry (one-way AMR telemetry) would be utilized that
21 will allow LG&E in most cases to avoid manually reading the meters. The cost support
22 for the opt-out charges is shown in Exhibit WSS-19. None of the costs or revenues

1 from customer opt-outs are included in test-year operating revenues and expenses in
2 these proceedings. Upon implementation of the AMI opt-out charge, it is anticipated
3 that the revenue collected from the charges will offset the cost of any customers that
4 choose to opt out of AMI.

5

6 **V. ADVANCED METERING INFRASTRUCTURE (AMI)**

7 **A. PERSONAL EXPERIENCE WITH AMI**

8 **Q. Have you worked with utilities that have implemented Advanced Metering**
9 **Infrastructure (AMI) programs?**

10 A. Yes. Most of my electric cooperative and investor-owned utility clients have
11 implemented AMI.

12 **Q. Has AMI been useful in performing cost of service studies and in designing rates?**

13 A. Yes. The demand data collected from AMI have improved the accuracy of the cost of
14 service studies. Without AMI, utilities would rely on sampled load data or data for other
15 utilities to develop demand allocators used in cost of service studies. With AMI, utilities
16 have demand data for almost every customer on the system; therefore, demand allocation
17 factors are essentially exact, with very little estimation required to develop the three
18 categories of demand allocation factors typically used in cost of service studies – namely,
19 coincident peak allocators, maximum class demand allocators, and maximum individual
20 customer demand allocators. The availability of this data is also used to develop accurate
21 loss studies for utilities, which are used in cost of service studies.

1 AMI has also allowed utilities to develop innovative rate designs for a broader
2 group of customers. Specifically, AMI has allowed utilities to develop a multitude of
3 time-of-day rate options for all of their customers, without installing special purpose
4 metering whenever a customer requests a special rate. With the utilities I have worked
5 with, those with AMI can quickly roll out a new time-differentiated or real-time rate to a
6 broad group of customers without installing specialized metering equipment specifically
7 programed for a certain rate structure. With AMI, the meters can be interrogated
8 remotely for application of a specific rate design.

9

10 **B. FUTURE RATE OFFERINGS**

11 **Q. Would the Companies be well positioned to offer more time-of-day offerings once**
12 **AMI is implemented?**

13 A. Yes. KU and LG&E currently offer time-of-day offerings to residential customers, but
14 the rate schedules are limited to 500 participants for each company. In these proceedings,
15 the Companies are proposing to offer two optional General Time of Day Services (Rate
16 GTOD-Energy and GTOD-Demand) that would be available to any General Service
17 (Rate GS) customer enrolled in the Advanced Metering Systems Customer Service
18 Offering set forth in the Companies' Demand-Side Management Cost Recovery
19 Mechanism. The Companies do not currently offer four-part time-of-day rates for Power
20 Service Rate PS customers.

21

1 **VII. ELECTRIC COST OF SERVICE STUDIES**

2 **Q. Did The Prime Group prepare cost of service studies for KU and for LG&E's**
3 **electric operations based on forecasted financial and operating results for the 12**
4 **months beginning July 1, 2021?**

5 A. Yes. The Prime Group prepared fully allocated embedded cost of service studies
6 based on a forecasted test year beginning July 1, 2021 for KU and for LG&E's electric
7 operations. The cost of service study for LG&E's gas operations will be discussed
8 later in my testimony. The cost of service studies correspond to the pro-forma
9 financial exhibits that the Companies are providing to meet the requirements of
10 Section 16(8). The Companies' objectives in performing the electric cost of service
11 studies were to determine the rate of return on rate base the Companies are earning
12 from each customer class, allocate revenue requirements as fairly as possible among
13 all of the classes of customers the Companies serve, and provide the data necessary to
14 develop rate components that more accurately reflect cost causation.

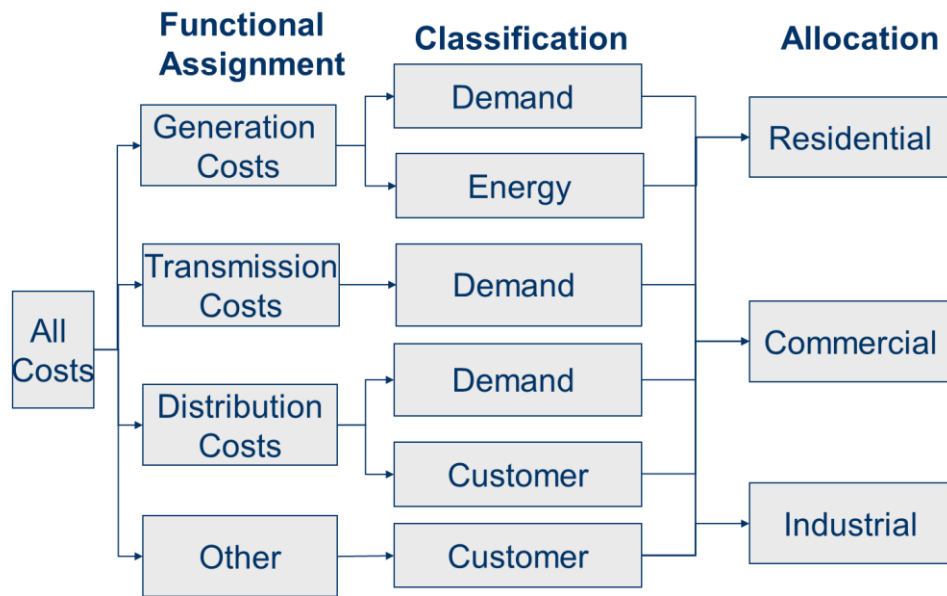
15 **Q. What model was used to perform the cost of service studies?**

16 A. The cost of service studies were performed using an EXCEL™ spreadsheet model that
17 was developed by The Prime Group and that has been utilized in previous filings by
18 KU and LG&E to support requests for adjustments in their rates.

19 **Q. What procedure was used in performing the cost of service studies?**

20 A. Regardless of whether a historical test year or a forecasted test year is used to develop
21 a cost of service study, the methodology for developing a cost of service study is
22 basically the same. The three traditional steps of an embedded cost of service study –

1 functional assignment, classification, and allocation – were utilized to classify costs.
 2 The cost of service studies for KU and LG&E were therefore prepared using the
 3 following procedure: (1) costs were functionally assigned (*functionalized*) to the major
 4 functional groups; (2) costs were then *classified* as commodity-related, demand-
 5 related, or customer-related; and then finally (3) costs were allocated to the rate
 6 classes. These steps are depicted in the following diagram (Figure 1).



8
 9 **Figure 1**

10
 11 The following functional groups were identified in the cost of service studies: (1)
 12 Production, (2) Transmission, (3) Distribution Substation, (4) Distribution Primary
 13 Lines, (5) Distribution Secondary Lines, (6) Distribution Line Transformers, (7)
 14 Distribution Services, (8) Distribution Meters, (9) Distribution Street and Customer

1 Lighting, (10) Customer Accounts Expense, (11) Customer Service and Information,
2 and (12) Sales Expense. Because KU operates in multiple jurisdictions, it was
3 necessary to identify costs for the Kentucky jurisdiction prior to developing a cost of
4 service study. Therefore, the spreadsheet model used to perform the cost of service
5 study also includes a jurisdictional separation analysis.

6 **Q. Did you supervise the preparation of KU's jurisdictional separation study for the**
7 **forecasted test period?**

8 A. Yes. Because KU operates in three jurisdictions (Kentucky State Jurisdiction, Virginia
9 State Jurisdiction, and FERC Jurisdiction), *joint costs* incurred to provide service
10 *jointly* to all three jurisdictions, such as production fixed costs, must be *allocated* to
11 the jurisdictions based on relative cost responsibility by jurisdiction, and any
12 identifiable *direct costs* incurred in providing service to a particular jurisdiction must
13 be *directly assigned* to that jurisdiction. Because production plant, for example, is
14 *jointly used* by all three jurisdictions to meet each jurisdiction's demand requirements,
15 these *joint costs* related to production plant must be allocated to the jurisdictions based
16 on the demand responsibility of each jurisdiction relative to the total. On the other
17 hand, distribution plant costs are recorded on KU's accounting records *by jurisdiction*
18 and can be *directly assigned* to each jurisdiction. The jurisdictional separation study
19 generated the Kentucky jurisdiction allocation factors shown on Schedule B-7.

20 **Q. How were production fixed costs allocated in the Companies' cost of service**
21 **studies?**

1 A. KU and LG&E’s production fixed costs were allocated using the Loss of Load
2 Probability (LOLP) methodology, which was filed in the Companies’ 2016 and 2018
3 rate case proceedings. Several intervenors supported the LOLP methodology in the
4 2016 proceedings.

5 LOLP represents the probability that a utility system’s total demand will
6 exceed its generation capacity during a given hour. LOLP therefore takes into
7 consideration the magnitude of the load, installed generation capacity, forced outage
8 rates, maintenance schedules, and ramp-up rates of generating units. LOLP can be
9 calculated for any period – an hour, a day, a week, etc. LOLP is a critical measurement
10 the Companies use to plan their generation resources. Specifically, it is used to
11 evaluate the level of reserve margins the Companies target. Therefore, LOLP can
12 serve as a foundation for allocating fixed production costs to the classes of customers.
13 In other words, allocating fixed production costs on the basis of LOLP links the cost-
14 of-service allocation methodology to a key measurement the Companies use to plan
15 the system.

16 For the cost of service studies, LOLP was calculated for each hour of the test
17 year based on the hourly loads for the test year and the characteristics of the
18 Companies’ generating facilities, including capacity, forced outage rates, and
19 maintenance schedules. Hourly loads for each rate class were then weighted by the
20 LOLP for each hour to determine LOLP weighted hourly load for each rate class. The
21 weighted loads for each rate class are then summed for the test year to determine a

1 production fixed cost allocator. Mathematically, this is equivalent to calculating an
2 allocation vector for fixed production costs using the following formula:

$$\overline{PROD\ ALLOCATOR} = \sum_{i=1}^{8784} LOLP_i * \overline{LOAD}_i$$

3

4

5 Where: $\overline{PROD\ ALLOCATOR}$ is the allocation vector for
6 production fixed costs in the cost of service study;

7 $LOLP_i$ is the Loss of Load Probability for hour i;

8 \overline{LOAD}_i is a vector of hourly load (in kW) for each rate
9 class at hour i; for example, $\overline{LOAD}_i =$ (load for Rate RS
10 at hour i, load for Rate GS for hour i, load for Rate PS
11 at hour i, ...); and

12 i is the hour of the year.

13

14 The allocation vector $\overline{PROD\ ALLOCATOR}$ is then used to allocate fixed production
15 costs to the customer classes in the cost of service study.

16 **Q. Is the LOLP approach a time-differentiated methodology?**

17 A. Yes, and at a fine level of granularity. The LOLP methodology is identified in
18 NARUC's *Electric Utility Cost Allocation Manual* as a standard methodology for
19 performing time-differentiated cost of service studies. With the LOLP methodology,
20 costs are differentiated for each hour of the test year. The approach can be adapted to

1 calculate costs for any set of time periods during the test year Exhibit WSS-21 is a
2 summary of the production fixed cost allocators used in the study.

3 **Q. Was the revenue allocation set forth in the Stipulation in the Companies' last rate**
4 **cases based on the LOLP methodology?**

5 A. Yes. In its Orders in those rate cases, the Commission directed the Companies to file
6 an alternative production cost allocation methodology along with the LOLP cost of
7 service study.

8 **Q. Are the Companies filing alternative cost of service studies in compliance with**
9 **the Commission's Orders?**

10 A. Yes. In addition to the LOLP cost of service study, the Companies are also filing the
11 only two alternative methodologies submitted by intervenors in Case Nos. 2018-00294
12 and 2018-00295: a 12 CP cost of service study, which was proposed by the Kentucky
13 Industrial Utility Customers, Inc.'s ("KIUC's") witness,²⁸ and a 6 CP cost of service
14 study, which was proposed by Federal Executive Agencies' ("FEA's") witness.²⁹

15 **Q. Please describe the 12 CP and 6 CP methodologies.**

16 A. The 12 CP methodology allocates production fixed costs on the sum of the monthly
17 coincident peak demands for each rate class. The 6 CP methodology allocates
18 production fixed costs on the sum of the monthly coincident peak demands for each

²⁸ *Electronic Application of Kentucky Utilities Company for an Adjustment of Its Electric Rates*, Case No. 2018-00294, Testimony of Stephen J. Baron (Ky. P.S.C. Jan. 16, 2019); *Electronic Application of Louisville Gas and Electric Company for an Adjustment of Its Electric and Gas Rates*, Case No. 2018-00295, Testimony of Stephen J. Baron (Ky. P.S.C. Jan. 16, 2019).

²⁹ Case No. 2018-00294, Testimony of James T. Selecky (Ky. P.S.C. Jan. 16, 2019); Case No. 2018-00295, Testimony of James T. Selecky (Ky. P.S.C. Jan. 16, 2019).

1 rate class during the four summer months of June through September and the two
2 winter months of January and February.

3 **Q. Do you have a preference between the two alternative methodologies?**

4 A. Yes. The 6 CP methodology more accurately reflects the Companies' generation
5 planning than the 12 CP methodology. The Companies' system is summer peaking
6 but the Companies also have a large winter peak. Therefore, the Companies give
7 considerable attention to the winter peak demands, particularly in selecting the type
8 of generation resources needed to meet both the summer and peak demands. But very
9 little consideration is given to the system peak demands during the spring and fall
10 months. Because the 12 CP methodology includes monthly demands for shoulder
11 months such as March, April, May, October, and November, the methodology gives
12 too much weight to demands for months that play little or no role in planning. By
13 including demands for four summer months and two winter months, the 6 CP gives an
14 appropriate weighting to the allocation of production costs for a summer peaking
15 utility with a winter peak that is nearly as high as the summer peak. For these reasons,
16 I favor the 6 CP over the 12 CP methodology. But a problem with both the 12 CP
17 and 6 CP methodologies is that both methods rely on demands for a limited number
18 of hours during the year. The LOLP methodology is more robust in that it weights
19 all hours by the LOLPs for each hour of the year, which is a key metric in the
20 Companies' generation system planning activities.

21 **Q. Have you prepared an exhibit that compares the class rates of return for the three**
22 **methodologies?**

1 A. Yes. Exhibit WSS-22 compares the class rates of return using the LOLP
2 methodology, 12 CP methodology, and the 6 CP methodology. The spreadsheet
3 workpapers for the alternative cost of service studies are being provided electronically.

4 **Q. How were costs classified as energy-related, demand-related or customer-**
5 **related?**

6 A. Classification involves utilizing the appropriate cost driver for each functionally
7 assigned cost, which provides a method of arranging costs so that the service
8 characteristics that give rise to the costs can serve as a basis for allocation. For costs
9 classified as *energy-related*, the appropriate cost driver is the amount of kilowatt-
10 hours consumed. Fuel and purchased power expenses are examples of costs typically
11 classified as energy costs. Costs classified as *demand-related* tend to vary with the
12 capacity needs of customers, such as the amount of generation, transmission or
13 distribution equipment necessary to meet a customer's needs. The costs of production
14 plant and transmission lines are examples of costs typically classified as demand-
15 related costs. Costs classified as *customer-related* include costs incurred to serve
16 customers regardless of the quantity of electric energy purchased or the peak
17 requirements of the customers and include the cost of the minimum system necessary
18 to provide a customer with access to the electric grid. As will be discussed later in my
19 testimony, a portion of the costs related to Distribution Primary Lines, Distribution
20 Secondary Lines and Distribution Line Transformers were classified as demand-
21 related and customer-related using the zero-intercept methodology. Distribution
22 Services, Distribution Meters, Distribution Street and Customer Lighting, Customer

1 Accounts Expense, Customer Service and Information and Sales Expense were
2 classified as customer-related because these costs do not vary with customers'
3 capacity or energy usage.

4 **Q. What methodologies are commonly used to classify distribution plant between**
5 **customer-related and demand-related components?**

6 A. Two commonly used methodologies for determining demand/customer splits of
7 distribution plant are the “minimum system” methodology and the “zero-intercept”
8 methodology. In the minimum system approach, “minimum” standard poles,
9 conductor, and line transformers are selected and the minimum system is obtained by
10 pricing all of the applicable distribution facilities at the unit cost of the minimum size
11 plant. The minimum system determined in this manner is then classified as customer-
12 related and allocated on the basis of the average number of customers in each rate
13 class. All costs in excess of the minimum system are classified as demand-related.
14 The theory supporting this approach maintains that in order for a utility to serve even
15 the smallest customer, it would have to install a minimum size system. Therefore, the
16 costs associated with the minimum system are related to the number of customers that
17 are served, instead of the demand imposed by the customers on the system.

18 In preparing the studies, the “zero-intercept” methodology was used to
19 determine the customer components of overhead conductor, underground conductor,
20 and line transformers. Because the zero-intercept methodology is less subjective than
21 the minimum system approach, the zero-intercept methodology is preferred over the
22 minimum system methodology when the necessary data is available. Additionally,

1 KU and LG&E have utilized the zero-intercept methodology in determining customer-
2 related costs in prior rate case filings before this Commission. With the zero-intercept
3 methodology, we are not forced to choose a minimum size conductor or line
4 transformer to determine the customer-related component of distribution costs. In the
5 zero-intercept methodology, the estimated cost of a zero-size conductor or line
6 transformer is the absolute minimum system for determining customer-related costs.

7 **Q. What is the theory behind the zero-intercept methodology?**

8 A. The theory behind the zero-intercept methodology is that there is a linear relationship
9 between the unit cost of conductor (\$/ft) or line transformers (\$/kVA of transformer
10 size) and the load flow capability of the plant measured as the cross-sectional area of
11 the conductor or the kVA rating of the transformer. After establishing a linear relation,
12 which is given by the equation:

$$y = a + bx$$

13 where:

14 **y** is the unit cost of the conductor or transformer,

15 **x** is the size of the conductor (MCM) or transformer (kVA), and

16 **a, b** are the coefficients representing the intercept and slope,
17 respectively

18 it can be determined that, theoretically, the unit cost of a foot of conductor or
19 transformer with zero size (or conductor or transformer with zero load carrying
20 capability) is **a**, the zero-intercept. The zero-intercept is essentially the cost

1 component of conductor or transformers that is invariant to the size and load carrying
2 capability of the plant.

3 Like most electric utilities, the feet of conductor and the number of
4 transformers on KU and LG&E's systems are not uniformly distributed over all sizes
5 of wire and transformer. For this reason, it was necessary to use a weighted linear
6 regression analysis, instead of a standard least-squares analysis, in the determination
7 of the zero intercept. Without performing a weighted linear regression analysis all
8 types of conductor and transformers would have the same impact on the analyses, even
9 though the quantity of conductor and transformers are not the same for each size and
10 type.

11 Using a weighted linear regression analysis, the cost and size of each type of
12 conductor or transformer is weighted by the number of feet of installed conductor or
13 the number of transformers. In a weighted linear regression analysis, the following
14 weighted sum of squared differences

$$\sum_i w_i (y_i - \hat{y}_i)^2$$

15 is minimized, where w is the weighting factor for each size of conductor or
16 transformer, and y is the observed value and \hat{y} is the predicted value of the dependent
17 variable.

18 **Q. Has the Commission accepted the use of the zero-intercept methodology?**

19 A. Yes. The Commission found LG&E's cost of service studies (both electric and gas)
20 submitted in Case No. 2000-080 and Case No. 90-158 to be reasonable, thus providing

1 a means of measuring class rates of return that are suitable for use as a guide in
2 developing appropriate revenue allocations and rate design. The cost of service
3 studies in both proceedings utilized a zero-intercept methodology to calculate the
4 splits between demand-related and customer-related distribution costs. The
5 Commission also found the embedded cost of service study submitted by Union Light
6 Heat and Power in Case No. 2001-00092, which utilized a zero-intercept
7 methodology, to be reasonable. Furthermore, the zero-intercept methodology has
8 been used in every cost of service study filed by both KU and LG&E since the early
9 1980s, including the cost of service studies filed in Case Nos. 2018-00294 and 2018-
10 00295, the Companies' last two rate cases.

11 **Q. Have you prepared exhibits showing the results of the zero-intercept analysis?**

12 A. Yes. For KU, the zero-intercept analyses for overhead conductor, underground
13 conductor, and line transformers are included in Exhibits WSS-23, WSS-24 and WSS-
14 25, respectively. For LG&E, the zero-intercept analyses for overhead conductor,
15 underground conductor, and line transformers are included in Exhibits WSS-26, WSS-
16 27 and WSS-28, respectively. For overhead conductor, the LG&E results were
17 utilized because the weighted regression analysis for KU did not yield statistically
18 valid results.

19 **Q. Have you prepared an exhibit showing the results of the functional assignment,
20 time-differentiation and classification steps of the electric cost of service study?**

21 A. Yes. Exhibit WSS-29 shows the results of the first two steps of the electric cost of
22 service study, namely functional assignment and classification, for KU. Exhibit WSS-

1 30 shows the same two steps for LG&E. In the cost of service model used in this
2 study, the calculations for functionally assigning and classifying Companies'
3 accounting costs are made using what are referred to in the model as "functional
4 vectors". These vectors are multiplied (using *scalar multiplication*³⁰) by the dollar
5 amount in the various accounts to simultaneously functionally assign and classify KU
6 and LG&E's accounting costs. These calculations are made in the portion of the cost
7 of service model included in Exhibits WSS-29 (KU) and WSS-30 (LG&E). In these
8 exhibits, the Companies' accounting costs are functionally assigned and classified
9 using explicitly determined functional vectors (i.e., "external vectors") and using
10 internally generated functional vectors. The explicitly determined functional vectors,
11 which are primarily used to direct where costs are functionally assigned and classified,
12 are shown on pages 29 and 30 of Exhibits WSS-29 for KU and WSS-30 for LG&E.
13 Internally generated functional vectors are utilized throughout the study to
14 functionally assign and classify costs on the basis of similar costs or on the basis of
15 internal cost drivers. The internally generated functional vectors are also shown on
16 pages 29 and 30 of Exhibits WSS-29 for KU and WSS-30 for LG&E. The functional
17 vector used to allocate a specific cost is identified in the column of the model labeled
18 "Vector" and refers to a vector identified elsewhere in the analysis by the column
19 labeled "Name".

³⁰ "Scalar multiplication" is the multiplication of each element of a vector by a constant (scalar). Scalar multiplication is different from "vector multiplication," in which one vector is multiplied by another vector either as a dot product (whose product is a scalar) or as a cross product (whose product is another vector).

1 **Q. Please describe how the functionally assigned and classified costs were allocated**
2 **to the various classes of customers.**

3 A. Exhibits WSS-31 (KU) and WSS-32 (LG&E) show the allocation of the functionally
4 assigned and classified costs to the various classes of customers that KU and LG&E
5 serve. For a forecasted test year, the average number of customers is used for
6 allocating customer-related costs rather than the year-end number of customers that is
7 used for a historical test year. The following allocation factors were used in the
8 electric cost of service study to allocate the functionally assigned and classified costs:

- 9 • **E01** – The energy cost component of purchased power
10 costs was allocated on the basis of the loss adjusted
11 kWh sales to each class of customers during the test
12 year.
- 13 • **LOLP** – The cost components of production fixed costs
14 were allocated on the basis of the total sum of each
15 class’s contribution to the forecasted loss of load
16 probability during every hour of the test year.
- 17 • **NCPT** – The demand cost component is allocated based
18 on the maximum class demands for transmission,
19 primary and secondary voltage customers. This
20 allocation vector is used to allocate transmission costs.
- 21 • **NCPP** – The demand cost component is allocated on

- 1 the basis of the maximum class demands for primary
2 and secondary voltage customers. This allocation
3 vector is used to allocate distribution substations and
4 primary distribution demand-related costs.
- 5 • **SICD** – The demand cost component is allocated on the
6 basis of the sum of individual customer demands for
7 secondary voltage customers.
 - 8 • **C02** – The customer cost component of customer
9 services is allocated on the basis of the average number
10 of customers for the test year.
 - 11 • **C03** – Meter costs were specifically assigned by
12 relating the costs associated with various types of
13 meters to the class of customers for whom these meters
14 were installed.
 - 15 • **Cust04** – Customer-related O&M costs associated with
16 lighting systems were specifically assigned to the
17 lighting class of customers.
 - 18 • **PCust04** – Customer-related plant and rate base
19 associated with lighting systems were specifically
20 assigned to the lighting class of customers.
 - 21 • **Cust05 and Cust06** – Meter reading, billing costs and

1 customer service O&M expenses were allocated on the
2 basis of a customer weighting factor calculated using
3 the 12 month average number of customers for the test
4 year based on discussions with the Companies' meter
5 reading, billing and customer service departments.

6 • **PCust05 and PCust06** – Meter reading, billing costs
7 and customer service plant expenses were allocated on
8 the basis of a customer weighting factor calculated
9 using the 13 month average number of customers for the
10 test year based on discussions with the Companies'
11 meter reading, billing and customer service
12 departments.

13 • **Cust07** – Customer-related O&M costs for secondary-
14 voltage distribution facilities are allocated on the basis
15 of the 12 month average number of customers using line
16 transformers and secondary voltage conductor.

17 • **PCust07** – Customer-related plant costs for secondary-
18 voltage distribution facilities are allocated on the basis
19 of the 13 month average number of customers using line
20 transformers and secondary voltage conductor.

21 • **Cust08** – Customer-related O&M costs for primary-

1 voltage distribution facilities are allocated on the basis
2 of the 12 month average number of customers using
3 primary voltage conductor.

4 • **PCust08** – Customer-related plant costs for primary-
5 voltage distribution facilities are allocated on the basis
6 of the 13 month average number of customers using
7 primary voltage conductor.

8 • **Cust09** – Customer-related O&M costs for
9 transformers are allocated on the basis of the 12 month
10 average number of customers using distribution
11 transformers.

12 • **PCust09** – Customer-related plant costs for
13 transformers are allocated on the basis of the 13 month
14 average number of customers using distribution
15 transformers.

16 • **GPLLOLPDA, NPLLOLPDA, RBLLOLPDA,**
17 **POMLOLPDA, PDEPLOLPDA, and PPTLOLPDA**
18 – These allocators are used to specifically assign
19 production-related demand costs associated with the
20 Solar Share and Business Solar programs directly to
21 those respective rate classes. These allocators directly

1 assign Gross Plant, Net Plant, Net Rate Base, O&M,
2 Depreciation, and Property Taxes associated with those
3 programs directly to customers participating in those
4 programs.

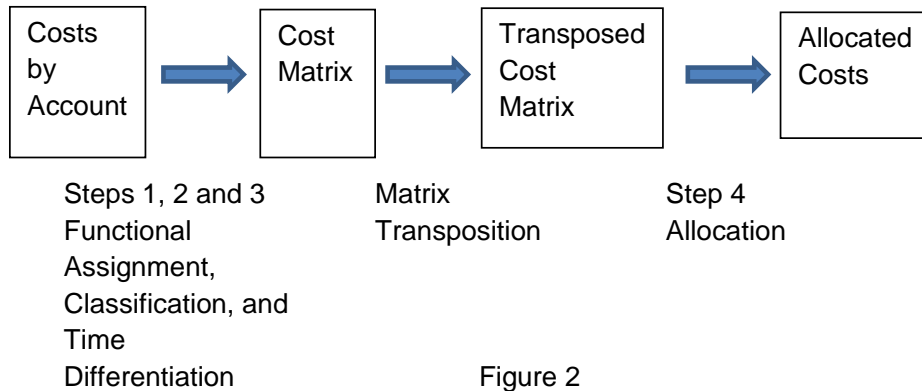
- 5 • **MGPA, MNPA, MRBA, MOMA, MDA, and MPTA**

6 – These allocators are used to specifically assign
7 customer-related costs associated with the Electric
8 Vehicle Charging programs directly to those respective
9 rate classes. These allocators directly assign Gross
10 Plant, Net Plant, Net Rate Base, O&M, Depreciation,
11 and Property Taxes associated with those programs
12 directly to customers participating in those programs.

13 **Q. Once costs are functionally assigned and classified, what calculations are used to**
14 **allocate these costs to the various customer classes the Companies serve?**

15 A. Once costs for all of the major accounts are functionally assigned and classified, the
16 resultant cost matrix for the major cost groupings (e.g., Plant in Service, Rate Base,
17 O&M Expenses) is then transposed and allocated to the customer classes using
18 “allocation vectors” or “allocation factors”. A transpose of a matrix is formed by
19 turning all the rows of a given matrix into columns and vice-versa. This process results
20 in the columns of functionally assigned and classified costs becoming rows in the
21 transposed matrix which then can be allocated to the various classes of customers.
22 This process is illustrated in Figure 2 below.

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10 **Q.**

The results of the class allocation step of the cost of service study are included in Exhibits WSS-31 (KU) and WSS-32 (LG&E). The costs shown in the column labeled “Total System” in Exhibits WSS-29 and WSS-30 were carried forward from the functionally assigned and classified costs shown in Exhibits WSS-31 and WSS-32, respectively. The column labeled “Ref” in Exhibits WSS-31 and WSS-32 provides a reference to the results included in Exhibits WSS-29 and WSS-30, respectively.

Please summarize the results of the electric cost of service studies.

11 **A.**

The Current Rate of Return on Rate Base was calculated by dividing the adjusted net operating income by the adjusted net cost rate base for each customer class. The adjusted net operating income and rate base reflect the rate base, income and expenses discussed in the testimony of Mr. Garrett. The Proposed Rate of Return on Rate Base was calculated by dividing the net operating income adjusted for the proposed rate increase by the adjusted net cost rate base. The determination of the actual adjusted and proposed rates of return are shown on pages 25 through 28 and pages 27 through

17

1 30, respectively, of Exhibits WSS-31 and WSS-32, for KU and LG&E, respectively.
2 The rates of return by customer class for the LOLP cost of service study along with
3 the 6-CP and 12-CP methodologies are shown in Exhibit WSS-22

4 **VIII. GAS COST OF SERVICE STUDY**

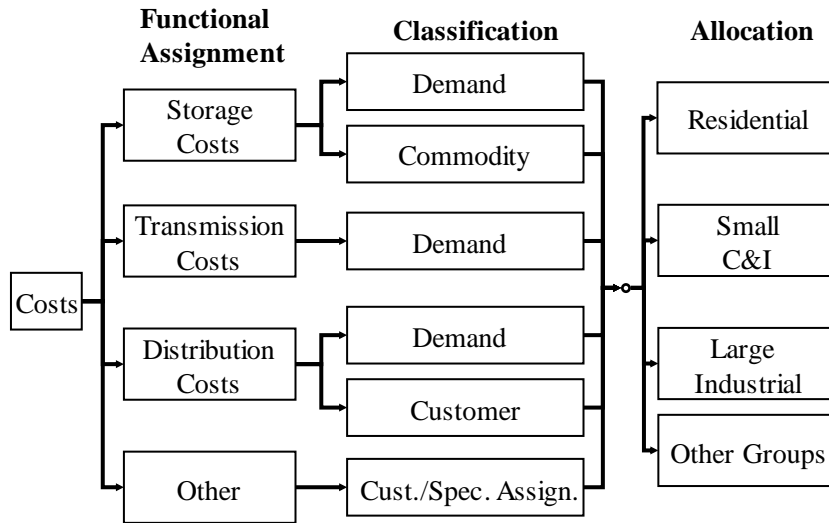
5 **Q. Did you prepare a cost of service study for LG&E's gas operations based on**
6 **financial and operating results for the 12 months beginning July 1, 2021?**

7 A. Yes. I supervised the preparation of a fully allocated, embedded cost of service study
8 for gas operations for the forecasted test year beginning July 1, 2021, based on
9 LG&E's forecasted accounting costs. The cost of service study corresponds to the
10 pro-forma financial exhibits included in the testimony of Mr. Garrett. As with the
11 electric cost of service studies, the objective in performing the gas cost of service study
12 is to determine the rate of return on rate base that LG&E is earning from each customer
13 class, allocate LG&E's natural gas revenue requirement as fairly as possible to the
14 various classes of customers that LG&E serves, and provide the data necessary to
15 develop rate components that more accurately reflect cost causation.

16 **Q. Generally, were the procedures used in performing the gas cost of service study**
17 **the same as those that you described above for the electric cost of service studies?**

18 A. Yes. The gas cost of service study was prepared using the following procedure: (1)
19 costs were functionally assigned (*functionalized*) to the major functional groups, (2)
20 costs were then *classified* as commodity-related, demand-related, or customer-related;
21 and then finally (3) costs were allocated to the various natural gas rate classes that

1 LG&E serves. These steps are depicted in the following diagram (Figure 3). This is
 2 a standard approach utilized in the preparation of embedded cost of service studies for
 3 natural gas utilities.



4 **Figure 3**

5 **Q. What functional groups were used in the natural gas cost of service study?**

6 A. The following functional groups were identified in the cost of service study: (1)
 7 Procurement, (2) Storage, (3) Storage-Related Transmission, (4) Non-Storage-Related
 8 Transmission, (5) Distribution Commodity, (6) Distribution Structures and
 9 Equipment, (7) Distribution Mains – Low- and Medium-Pressure, (8) Distribution
 10 Mains – High-Pressure, (9) Services, (10) Meters, (11) Customer Accounts, and (12)
 11 Customer Service Expense.

12 **Q. Please describe the functional assignment of transmission costs.**

1 A. There are two functional groups for transmission costs: Storage-Related Transmission
2 and Non-Storage-Related Transmission. Storage-Related Transmission costs
3 represent the transmission facilities that are used to deliver natural gas from LG&E's
4 storage fields to the distribution system. The Non-Storage-Related Transmission
5 functional group represents costs of transmission facilities used to deliver gas from
6 interstate pipelines both to the distribution system and directly to customers. It is
7 important to distinguish between the two types of costs because the Non-Storage-
8 Related Transmission facilities are used to serve all customer classes, including both
9 sales and transportation customers, by delivering gas to the distribution system and
10 directly to individual customers, whereas the use of Storage-Related Transmission
11 facilities is limited to delivering storage gas to sales customers and to serving daily
12 imbalances created by transportation customers. Therefore, the use of Storage-
13 Related Transmission facilities to serve customers under Rate FT and any other firm
14 transportation-only service would be limited to their use of daily imbalance service
15 facilitated through storage. Exhibit WSS-33 shows the derivation of the functional
16 assignment for transmission plant.

17 **Q. How were costs classified as commodity-related, demand-related or customer-**
18 **related?**

19 A. Classification involves identifying the appropriate cost driver for each account, which
20 provides a method of arranging costs so that the service characteristics that give rise
21 to the costs can serve as a basis for allocation. Costs classified as *commodity-related*
22 tend to vary with the quantity of gas delivered, such as gas supply and the operation

1 of compressors. Since gas supply costs were removed from the cost of service study,
2 it was not necessary to classify gas supply costs. Costs classified as *demand-related*
3 are costs related to facilities installed to meet design-day usage requirements. Costs
4 classified as *customer-related* include non-volumetric costs incurred to serve
5 customers that are invariant to either the quantity of gas delivered to the customers or
6 the peak demand requirements of the customers. All transmission plant costs were
7 classified as demand-related. The transmission plant used to deliver natural gas from
8 and to storage is allocated on the same basis as storage. The transmission plant used
9 to deliver gas from the pipelines into LG&E's distribution system was allocated on
10 design-day demands. Distribution Structures and Equipment costs were classified as
11 demand-related. Costs related to Distribution Mains were functionally assigned as
12 either low- and medium-pressure mains or high-pressure mains and then classified as
13 demand-related and customer-related using the zero-intercept methodology. Services,
14 Meters, Customer Accounts, and Customer Service Expenses were classified as
15 customer-related.

16 **Q. Explain the zero-intercept methodology that you used to classify the costs of**
17 **mains between demand-related and customer-related costs.**

18 A. A portion of the cost of mains was classified as demand-related and a portion was
19 classified as customer-related using the zero-intercept methodology, which was
20 described above in connection with the electric cost of service study. The zero-
21 intercept analysis is included in Exhibit WSS-34.

22 **Q. How were distribution mains functionally separated between high-, low- and**

1 **medium-pressure categories?**

2 A. The feet of high-pressure mains by size of pipe were identified from LG&E’s maps
3 and records. The feet of low- and medium-pressure pipe were determined residually
4 by subtracting the specifically identified high-pressure mains from the total feet for
5 each pipe size. The zero-intercept unit cost of \$10.91 was then applied to the high-
6 pressure mains and to the low- and medium-pressure mains to determine the customer-
7 related portion of the mains.³¹ By identifying high-pressure mains from LG&E’s maps
8 and records, it was determined that LG&E’s high-pressure distribution mains
9 represent 9.37% of the total installed cost, with 4.44% corresponding to customer-
10 related costs and 4.92% corresponding to demand-related costs. The low- and
11 medium-pressure pipe make up the remaining 90.63% of installed cost, with 62.27%
12 classified as customer-related and 28.36% classified as demand-related. The
13 breakdown is shown on Exhibit WSS-34. The allocation of the cost to the customer
14 classes is shown on Exhibit WSS-35.

15 **Q. Was a similar separation made in the electric cost of service studies?**

16 A. Yes. The electric cost of service studies separate distribution conductor between
17 primary voltage conductor and secondary voltage conductor. The functional
18 separation in the gas cost of service study between high-pressure and low- and
19 medium-pressure pipe is analogous to the primary and secondary splits determined in

³¹ The cost of service study used the zero intercept results from the detailed analysis that was performed based on plant records as of June 30, 2020.

1 the electric cost of service studies. Differences in the pressure in a pipe are often used
2 as an analogy to differences in voltages.

3 **Q. Have you prepared an exhibit showing the results of the functional assignment
4 and classification steps of the cost of service study?**

5 A. Yes. Exhibit WSS-36 shows the results of the first two steps of the natural gas cost of
6 service study: functional assignment and classification.

7 **Q. Please describe the allocation factors used in the gas cost of service study.**

8 A. The results of allocating LG&E's functionally assigned and classified costs to the
9 various classes of customers that LG&E serves are provided in Exhibit WSS-37. The
10 following allocation factors were used in the gas cost of service study:

11

12 • **DEM01** is used to allocate procurement demand-related
13 costs; these costs are the procurement-related expenses
14 that are not recovered through LG&E's Gas Supply
15 Clause.

16

17 • **DEM02** is used to allocate Storage demand-related
18 costs and represents a composite allocation based on
19 extreme winter season requirements and design-day
20 demands. The class allocation factor is the sum of (a)
21 the volumes (commodity) withdrawn from storage

1 during the design winter season and (b) the volumes
2 needed in storage to meet the design-day demands.
3 Rate FT is assigned an allocation based on its utilization
4 of balancing service in accordance with the provision
5 set forth in the rate schedule to allow imbalances that do
6 not exceed $\pm 5\%$ of delivered volumes when an
7 Operational Flow Order (“OFO”) has not been issued.
8 The calculation of this allocation factor is shown in
9 Exhibit WSS-38.

10

11 • **DEM03** is used to allocate Transmission demand-
12 related costs for the portion of the transmission system
13 that is used to move gas to and from storage. Because
14 this portion of LG&E’s transmission lines is used to
15 either fill the storage fields or remove gas from storage,
16 transmission demand-related costs are allocated on the
17 same basis as storage demand-related costs.

18

19 • **DEM04** is used to allocate Distribution Structures and
20 Equipment demand-related costs and represents
21 forecasted maximum class demands determined at

1 LG&E's -14° F design-day mean temperature.

- 2
- 3 • **DEM05** is used to allocate the demand-related portion
4 of the cost of high-pressure distribution mains and the
5 cost of transmission lines used to move gas from the
6 pipelines to LG&E's distribution system. It represents
7 maximum class demands determined at the design-day
8 mean temperature of customers served at high-pressure
9 or below. The high-pressure system consists of pipe
10 pressured above 60 psi. All gas delivered into the low-
11 and medium-pressure system must first pass through the
12 high-pressure system. Consequently, all customers
13 utilize the high-pressure system.

- 14
- 15 • **DEM05a** is used to allocate the demand-related portion
16 of the cost of low- and medium-pressure distribution
17 mains and represents maximum class demands
18 determined at the design-day mean temperature of
19 customers served at medium pressure or low pressure.
20 The low- and medium- pressure system consists of pipe
21 pressured at 60 psi and below. The demands of

1 customers served at high pressure are not included in
2 the determination of this allocation factor. The low- and
3 medium-pressure system is not used to provide
4 distribution delivery service to customers served at high
5 pressure.

6

- 7 • **COM01** is used to allocate commodity-related
8 procurement expenses and represents annual
9 throughput volumes (including both sales and
10 transportation). Procurement expenses correspond to
11 expenses incurred by LG&E's gas supply department
12 (including labor), which are not recovered through the
13 Gas Supply Clause. This department not only
14 purchases gas for sales customers but also administers
15 LG&E's transportation service schedules.

16

- 17 • **COM02** is used to allocate Storage commodity-related
18 costs and represents forecasted customer class
19 deliveries during the winter withdrawal season (defined
20 as the months of November through March.)

21

- 1 • **COM03** is used to allocate Transmission commodity-
- 2 related costs and represents forecasted customer class
- 3 deliveries during the winter withdrawal season (defined
- 4 as the months of November through March.)
- 5
- 6 • **COM04** is used to allocate Distribution commodity-
- 7 related costs and represents annual throughput volumes
- 8 (including both sales and transportation.)
- 9
- 10 • **CUSTPT01** is used to allocate the customer-related
- 11 portion of LG&E's high-pressure distribution mains
- 12 and represents the 13-month average number of
- 13 customers served at high pressure and below.
- 14
- 15 • **CUSTPT01a** is used to allocate the customer-related
- 16 portion of LG&E's low- and medium-pressure
- 17 distribution mains and represents the 13-month average
- 18 number of customers at low and medium pressure. The
- 19 customers served at high pressure are not included in
- 20 the determination of this allocation factor because the
- 21 low- and medium-pressure system is not used to provide

1 distribution delivery service to customers served at high
2 pressure.

3

4 • **CUST02** is used to allocate services and is based on the
5 total estimated cost of installing a service line per
6 customer in each customer class weighted by the
7 average number of customers in each class.

8

9 • **CUST03** is used to allocate meters and is based on the
10 total cost of meters and meter installation costs per
11 customer in each customer class weighted by the
12 average number of customers in each class.

13

14 • **CUSTPT04** is used to allocate the plant and rate base
15 components of customer accounts expense and
16 represents 13-month average customers.

17

18 • **CUSTPT05** is used to allocate the plant and rate base
19 components of customer service. It is based on 13-
20 month average customers adjusted for weighting factors
21 for each class.

22

23 • **CUSTOM01** is used to allocate the customer-related

1 portion of O&M expenses for high-pressure distribution
2 mains and represents the 12-month average number of
3 customers served at high pressure and below.

4
5 • **CUSTOM01a** is used to allocate the customer-related
6 portion of O&M expenses for low- and medium-
7 pressure distribution mains and represents the average
8 number of customers at low and medium pressure. The
9 customers served at high pressure are not included in
10 the determination of this allocation factor because the
11 low- and medium-pressure system is not used to provide
12 distribution delivery service to customers served at high
13 pressure.

14
15 • **CUSTOM04** is used to allocate customer accounts
16 expenses (Accounts 901 through 905) and represents a
17 composite allocation factor.³²

³² This allocation factor is determined as follows: First, customer accounts supervision (Account 901), meter reading (Account 902), customer records and collections (Account 903), and miscellaneous customer account expenses (Account 905) were allocated to each customer class using a customer weighting factor based on discussions with LG&E’s meter reading, billing and customer service departments. A cost weighting factor of 1.0 was utilized for Residential Gas Service, a cost weighting factor of 1.1 was utilized for Commercial Gas Service, a cost weighting factor of 10 was utilized for Rates IGS and AAGS, and a customer weighting factor of 20 was utilized for Rate FT and special contracts. Using a cost weighting factor of 20 for Rate FT and special contracts, for example, means that the cost of performing the meter reading, billing and customer service functions for customers served under Rate FT is 20 times more than the cost of performing these same services for customers served under Rate RGS.

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- **CUSTOM05** is used to allocate customer service expenses using the same customer-weighting factor used to allocate Accounts 901, 902, 903, and 905 as in the calculation of CUST04.

Q. Summarize the results of the gas cost of service study.

A. The rates of return shown on net cost rate base for natural gas service for each customer class before and after reflecting the rate adjustments proposed by LG&E are shown on pages 12 and 13 of Exhibit WSS-37. The current rate of return on net cost rate base was calculated by dividing the adjusted net operating income by the adjusted net cost rate base for each customer class. The adjusted net operating income and rate base reflect the forecasted amounts discussed in the testimony of Mr. Garrett. The proposed rate of return on net cost rate base was calculated by dividing the net operating income adjusted for the proposed rate increase by the adjusted net cost rate base. Rate DGGS is not broken out in the cost of service study but is included in Rate IGS. Rate LGDS is not shown in the table because there are currently no customers served under the rate schedule. Currently, there is one commercial customer served under Rate SGSS. However, Rate SGSS is not broken out in the cost of service study but is included in Rate CGS.

1 **IX. LEAD-LAG STUDIES**

2 **Q. Did KU and LG&E perform a lead lag study in Case Nos. 2018-00294 and 2018-**
3 **00295?**

4 A. Yes. I supervised the preparation of the lead-lag studies for KU and for LG&E's
5 electric and gas operations. Mr. Garrett provided the balance sheet analyses used for
6 the study of cash working capital based on amounts from the Companies' forecast.
7 The lead-lag studies used historical payment activity to calculate revenue lag days and
8 expense lead days. *Revenue lag days* represent the difference between the date when
9 services are rendered by the Companies and the date when revenues for those services
10 are collected from customers. *Expense lead days* represent the date when expenses
11 are incurred to provide service and the date when those expenses are paid. The net
12 lead-lag days are multiplied by the respective average daily expenses and pass-through
13 items (*viz.*, sales taxes, school taxes, and franchise fees) to determine cash working
14 capital.

15 **Q. In Kentucky, are utilities required to perform a lead-lag study?**

16 A. No. In the Stipulation Agreement in Case Nos. 2016-00370 and 2016-00371, the
17 Companies agreed to submit lead-lag studies in their next general rate cases. The
18 Companies then filed lead-lag studies in Case Nos. 2018-00294 and 2018-00295. In
19 the current rate cases, KU and LG&E are updating the revenue lag analysis and
20 balance sheet analysis that were filed in Case Nos. 2018-00294 and 2018-00295. By
21 updating the revenue lag analysis and balance sheet analysis, the Companies are
22 following the practice prescribed by the Virginia State Corporation Commission (VA

1 SCC) for rate case filings in Virginia, which prescribes that if a lead-lag study is less
2 than five years old then only revenue lags and the balance sheet analysis are updated.³³

3 **Q. Based on your experience, is this practice reasonable?**

4 A. Yes. Unless there is a dramatic change in a utility's financial condition, it has been
5 my experience that expense leads do not change significantly within a five-year
6 period. Performing a lead-lag study is a major undertaking. Therefore, it is reasonable
7 to update revenue lags and the balance sheet analysis if the lead-lag study has been
8 performed within the last five years.

9 **Q. What period was used to perform the revenue lag analysis?**

10 A. The revenue lag analysis was performed using revenue and expense data for the
11 calendar year 2019.

12 **Q. How were revenue lag days determined?**

13 A. The revenue lag measures the number of days from the date service was rendered by
14 the Companies until the date payment was received from customers and the funds
15 deposited and available to the Companies. In the calculation, the revenue lag consists
16 of four time spans: (1) meter reading lag, which is the time period from the midpoint
17 of the service period to the meter read date; (2) billing lag, which is the period from
18 when the meter is read to the date when the bill is invoiced; (3) collection lag, which
19 is the period from when the bill is invoiced to when the customer payment is received;

³³ Virginia Administrative Code 20 VAC5-201-10 – Rules Governing Utility Rate Applications and Annual Information Filings with the VA SCC specifies that “Utilities required to use a lead/lag study should perform a complete lead/lag analysis every five years. Major items such as the revenue lag and balance sheet accounts should be reviewed every year.”

1 and (4) bank lag, which is the period from when the customer payment is received to
 2 when the Companies have access to the funds. The collection lag was determined
 3 using the turnover approach, which calculates the collection lag days by dividing the
 4 average daily accounts receivable balance by the average daily revenues and pass-
 5 through items (*viz.*, sales taxes, gross receipt taxes, and franchise fees). The turn-over
 6 method was used in KU-ODP's recent rate case filing in Virginia.

7 **Q. Please summarize the components of the revenue lag for KU and LG&E's electric**
 8 **and gas operations?**

9 A. The revenue lags by component are summarized below (TABLE 7):

10 **TABLE 7**

| Lag Component | Lag Days | | |
|--------------------------|-----------------|----------------------|---------------------|
| | KU | LG&E-Elec | LG&E-Gas |
| Meter Reading Lag | 15.21 | 15.21 | 15.21 |
| Billing Lag | 4.20 | 4.29 | 4.28 |
| Collection Lag | 25.09 | 23.77 | 23.77 |
| Bank Lag | 1.00 | 1.00 | 1.00 |
| Total Revenue Lag | 45.50 | 44.27 | 44.26 |

11

12 **Q. Do you have an exhibit showing the lead-lag days for each category of revenue**
 13 **and expense?**

14 A. Yes. The lead-lag days used to determine cash working capital are shown on Exhibit
 15 WSS-39. As mentioned earlier, the revenue lags have been updated based on an
 16 analysis of billings for 2019. The expense leads reflect values that were determined
 17 from the lead-lag study submitted in Case Nos. 2018-00294 and 2018-00295.

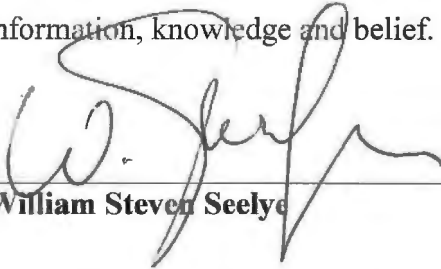
18 **Q. Does this conclude your testimony?**

1 A. Yes, it does.

VERIFICATION

STATE OF NORTH CAROLINA)
)
COUNTY OF BUNCOMBE)

The undersigned, **William Steven Seelye**, being duly sworn, deposes and states that he is a Principal of The Prime Group, LLC that he has personal knowledge of the matters set forth in the foregoing testimony and exhibits, and the answers contained therein are true and correct to the best of his information, knowledge and belief.



William Steven Seelye

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 18th day of November 2020.

Kyle Mello
NOTARY PUBLIC
BUNCOMBE COUNTY, NC
MY COMMISSION EXPIRES 7/29/2023



Notary Public (SEAL)

Notary Public ID No. 201821300096

My Commission Expires:

7/29/2023

Exhibit WSS-1

Qualifications

WILLIAM STEVEN SEELYE

Summary of Qualifications

Provides consulting services to numerous investor-owned utilities, rural electric cooperatives, municipal utilities, and public service commissions regarding utility rate and regulatory filings, cost of service and wholesale and retail rate designs; and develops revenue requirements for utilities in general rate cases, including the preparation of analyses supporting pro-forma adjustments and the development of rate base. Mr. Seelye has performed or supervised the preparation of cost of service studies and rate design studies for over 150 electric, gas and water utilities.

Employment

Principal and Managing Partner
The Prime Group, LLC
(1996 to 2012) (2015-Present)
(Associate Member 2012-2015)

Provides consulting services in the areas of tariff development, regulatory analysis, revenue requirements, cost of service studies, rate design, fuel and procurement, depreciation studies, lead-lag studies, and mathematical modeling.

Assists utilities with developing strategic resource and marketing plans. Assist with resource planning and cost benefit analyses for generation investment projects. Performs economic analyses evaluating the costs and benefits of an electric generation projects; performs business practice audits for electric utilities, gas utilities, and independent transmission organizations, including audits of production cost modeling, fuel procurement practices and controls, and wholesale marketing procedures. Assists investor-owned utilities in the development of testimony regarding the prudence of power supply decisions and of investments in specific generation and distribution assets.

Provides utility clients assistance regarding regulatory policy and strategy; project management support for utilities involved in complex regulatory proceedings; process audits; state and federal regulatory filing development; cost of service development and support; the development of innovative rates to achieve strategic objectives; unbundling of rates and the development of menus

of rate alternatives for use with customers; performance-based rate development.

Prepared retail and wholesale rate schedules and filings submitted to the Federal Energy Regulatory Commission (FERC) and state regulatory commissions for numerous of electric and gas utilities. Performed cost of service or rate studies for over 150 utilities throughout North America. Prepared market power analyses in support of market-based rate filings submitted to the FERC for utilities and their marketing affiliates. Performed business practice audits for electric utilities, gas utilities, and independent transmission organizations (ISOs), including audits of production cost modeling, retail utility tariffs, retail utility billing practices, and ISO billing processes and procedures.

Instructor in Mathematics
Walden School and Private Instruction
(2012-2015)

Taught advanced placement calculus, linear algebra, pre-calculus, college algebra and differential equations.

Manager of Rates and Other Positions
Louisville Gas & Electric Co.
(May 1979 to July 1996)

Held various positions in the rate department of LG&E. In December 1990, promoted to Manager of promoted to the position of Manager of Rates and Regulatory Analysis. In May 1994, give additional responsibilities in the marketing area and promoted to Manager of Market Management and Rates.

Education

Bachelor of Science Degree in Mathematics, University of Louisville, 1979
66 Hours of Graduate Level Course Work in Electrical and Industrial Engineering and Physics.

Associations

Member of the Society for Industrial and Applied Mathematics

Expert Witness Testimony

Alabama: Testified in Docket 28101 on behalf of Mobile Gas Service Corporation concerning rate design and pro-forma revenue adjustments.

Colorado: Testified in Consolidated Docket Nos. 01F-530E and 01A-531E on behalf of Intermountain Rural Electric Association in a territory dispute case.

Submitted expert report in Proceeding No. 14-CV-30031 before District Court, Prowers County, State of Colorado, on behalf of Arkansas River Power Authority in the *City of Lamar et al v. Arkansas River Power Authority* regarding power planning and operations.

Submitted expert report in Proceeding No. 19F-0315E before Public Utilities Commission of the State of Colorado, on behalf of San Luis Valley Rural Electric Cooperative in *Anne Pace, et al. v. San Luis Valley Rural Electric Cooperative* regarding demand charges for residential electric and distributed generation customers.

FERC: Submitted direct and rebuttal testimony in Docket No. EL02-25-000 et al. concerning Public Service of Colorado's fuel cost adjustment.

Submitted direct and responsive testimony in Docket No. ER05-522-001 concerning a rate filing by Bluegrass Generation Company, LLC to charge reactive power service to LG&E Energy, LLC.

Submitted testimony in Docket Nos. ER07-1383-000 and ER08-05-000 concerning Duke Energy Shared Services, Inc.'s charges for reactive power service.

Submitted testimony in Docket No. ER08-1468-000 concerning changes to Vectren Energy's transmission formula rate.

Submitted testimony in Docket No. ER08-1588-000 concerning a generation formula rate for Kentucky Utilities Company.

Submitted testimony in Docket No. ER09-180-000 concerning changes to Vectren Energy's transmission formula rate.

Submitted testimony in Docket No. ER11-2127-000 concerning transmission rates proposed by Terra-Gen Dixie Valley, LLC.

Submitted testimony in Docket No. ER11-2779 on behalf of Southern Illinois Power Cooperative concerning wholesale distribution service charges proposed by Ameren Services Company.

Submitted testimony in Docket No. ER11-2786 on behalf of Norris Electric Cooperative concerning wholesale distribution service charges proposed by Ameren Services Company.

- Florida: Testified in Docket No. 981827 on behalf of Lee County Electric Cooperative, Inc. concerning Seminole Electric Cooperative Inc.'s wholesale rates and cost of service.
- Illinois: Submitted direct, rebuttal, and surrebuttal testimony in Docket No. 01-0637 on behalf of Central Illinois Light Company ("CILCO") concerning the modification of interim supply service and the implementation of black start service in connection with providing unbundled electric service.
- Indiana: Submitted direct testimony and testimony in support of a settlement agreement in Cause No. 42713 on behalf of Richmond Power & Light regarding revenue requirements, class cost of service studies, fuel adjustment clause and rate design.
- Submitted direct and rebuttal testimony in Cause No. 43111 on behalf of Vectren Energy in support of a transmission cost recovery adjustment.
- Submitted direct testimony in Cause No. 43773 on behalf of Crawfordsville Electric Light & Power regarding revenue requirements, class cost of service studies, fuel adjustment clause and rate design.
- Submitted direct and cross answering testimony in Cause No. 45125 on behalf of the City of New Haven regarding Fort Wayne's revenue requirement, cost of service study and the apportionment of the water rate increase.
- Submitted direct and cross answering testimony in Cause No. 45142 on behalf of the City of Crown Point regarding Indiana-American Water Company's cost of service study, apportionment of the revenue increase, interruptible service rates and transportation service rates.
- Submitted direct and cross answering testimony in Cause No. 45235 on behalf of the City of South Bend regarding Indiana-Michigan Power Company's cost of service study, apportionment of the revenue increase and rate design.
- Submitted direct and cross answering testimony in Cause No. 45285 on behalf of the City of South Bend regarding Indiana-Michigan Power Company's demand side management (DSM) plan.
- Kansas: Submitted direct and rebuttal testimony in Docket No. 05-WSEE-981-RTS on behalf of Westar Energy, Inc. and Kansas Gas and Electric Company regarding transmission delivery revenue requirements, energy cost adjustment clauses, fuel normalization, and class cost of service studies.
- Kentucky: Testified in Administrative Case No. 244 regarding rates for cogenerators and small power producers, Case No. 8924 regarding marginal cost of service, and in numerous 6-month and 2-year fuel adjustment clause proceedings.

Submitted direct and rebuttal testimony in Case No. 96-161 and Case No. 96-362 regarding Prestonsburg Utilities' rates.

Submitted direct and rebuttal testimony in Case No. 99-046 on behalf of Delta Natural Gas Company, Inc. concerning its rate stabilization plan.

Submitted direct and rebuttal testimony in Case No. 99-176 on behalf of Delta Natural Gas Company, Inc. concerning cost of service, rate design and expense adjustments in connection with Delta's rate case.

Submitted direct and rebuttal testimony in Case No. 2000-080, testified on behalf of Louisville Gas and Electric Company concerning revenue requirements, cost of service, rate design, and pro-forma adjustments to revenues and expenses.

Submitted rebuttal testimony in Case No. 2000-548 on behalf of Louisville Gas and Electric Company regarding the company's prepaid metering program.

Testified on behalf of Louisville Gas and Electric Company in Case No. 2002-00430 and on behalf of Kentucky Utilities Company in Case No. 2002-00429 regarding the calculation of merger savings.

Submitted direct and rebuttal testimony in Case No. 2003-00433 on behalf of Louisville Gas and Electric Company and in Case No. 2003-00434 on behalf of Kentucky Utilities Company regarding revenue requirements, pro-forma revenue, expense and plant adjustments, class cost of service studies, and rate design.

Submitted direct and rebuttal testimony in Case No. 2004-00067 on behalf of Delta Natural Gas Company regarding pro-forma adjustments, depreciation rates, class cost of service studies, and rate design.

Testified on behalf of Kentucky Utilities Company in Case No. 2006-00129 and on behalf of Louisville Gas and electric Company in Case No. 2006-00130 concerning methodologies for recovering environmental costs through base electric rates.

Testified on behalf of Delta Natural Gas Company in Case No. 2007-00089 concerning cost of service, temperature normalization, year-end normalization, depreciation expenses, allocation of the rate increase, and rate design.

Submitted testimony on behalf of Big Rivers Electric Corporation and E.ON U.S. LLC in Case No 2007-00455 and Case No. 2007-00460 regarding the design and implementation of a Fuel Adjustment Clause, Environmental Surcharge, Unwind Surcredit, Rebate Adjustment, and Member Rate Stability Mechanism for Big

Rivers Electric Corporation in connection with the unwind of a lease and purchase power transaction with E.ON U.S. LLC.

Submitted testimony in Case No. 2008-00251 on behalf of Kentucky Utilities Company and in Case No. 2008-00252 on behalf of Louisville Gas and Electric Company regarding pro-forma revenue and expense adjustments, electric and gas temperature normalization, jurisdictional separation, class cost of service studies, and rate design.

Submitted testimony in Case No. 2008-00409 on behalf of East Kentucky Power Cooperative, Inc., concerning revenue requirements, pro-forma adjustments, cost of service, and rate design.

Submitted testimony in Case No. 2009-00040 on behalf of Big Rivers Electric Corporation regarding revenue requirements and rate design.

Submitted testimony on behalf of Columbia Gas Company of Kentucky in Case No. 2009-00141 regarding the demand side management program costs and cost recovery mechanism.

Submitted testimony in Case No. 2009-00548 on behalf of Kentucky Utilities Company and in Case No. 2009-00549 on behalf of Louisville Gas and Electric Company regarding pro-forma revenue and expense adjustments, electric and gas temperature normalization, jurisdictional separation, class cost of service studies, and rate design.

Submitted testimony in Case No. 2010-00116 on behalf of Delta Natural Gas Company concerning cost of service, temperature normalization, year-end normalization, depreciation expenses, allocation of the rate increase, and rate design.

Submitted testimony in Case No. 2011-00036 on behalf of Big Rivers Electric Cooperative concerning cost of service, rate design, pro-forma TIER adjustments, temperature normalization, and support of MISO Attachment O.

Submitted testimony in Case No. 2016-00107 on behalf of Columbia Gas Company of Kentucky regarding a tariff application to continue its energy efficiency and conservation rider and programs.

Submitted testimony in Case No. 2016-00274 on behalf of Kentucky Utilities Company and Louisville Gas and Electric Company in support of community solar rates.

Submitted direct and rebuttal testimony in Case No. 2016-00370 on behalf of Kentucky Utilities Company and in Case No. 2016-00371 on behalf of Louisville

Gas and Electric Company regarding electric and gas class cost of service studies and proposed rates.

Submitted rebuttal testimony in Case No. 2018-00050 on behalf of South Kentucky Rural Electric Cooperative Corporation regarding the regulatory application of the filed rate doctrine and cost shifts to other electric cooperatives related to a proposed purchased power agreement.

Submitted testimony in Case No. 2018-00044 on behalf of Columbia Gas Company of Kentucky regarding an assessment of its energy efficiency and conservation rider and programs.

Submitted direct and rebuttal testimony in Case No. 2018-00294 on behalf of Kentucky Utilities Company and in Case No. 2018-00295 on behalf of Louisville Gas and Electric Company regarding electric and gas class cost of service studies, apportionment of the revenue increase, pilot school rates, demand ratchets, late payment charges, residential customer charges, excess facilities charges, LED lighting rates, and lead-lag studies.

Maryland Submitted direct testimony in PSC Case No. 9234 on behalf of Southern Maryland Electric Cooperative regarding a class cost of service study.

Nevada: Submitted direct and rebuttal testimony in Case No. 03-10001 on behalf of Nevada Power Company regarding cash working capital, depreciation adjustments, and other rate base adjustments.

Submitted direct and rebuttal testimony in Case No. 03-12002 on behalf of Sierra Pacific Power Company regarding cash working capital.

Submitted direct and rebuttal testimony in Case No. 05-10003 on behalf of Nevada Power Company regarding cash working capital for an electric general rate case.

Submitted direct and rebuttal testimony in Case No. 05-10005 on behalf of Sierra Pacific Power Company regarding cash working capital for a gas general rate case.

Submitted direct and rebuttal testimony in Case Nos. 06-11022 and 06-11023 on behalf of Nevada Power Company regarding cash working capital for a gas general rate case.

Submitted direct and rebuttal testimony in Case No. 07-12001 on behalf of Sierra Pacific Power Company regarding cash working capital for an electric general rate case.

Submitted direct testimony in Case No. Docket No. 08-12002 on behalf of Nevada Power Company regarding cash working capital for an electric general rate case.

Submitted direct testimony in Case No. Docket No. 10-06001 on behalf of Sierra Pacific Power Company regarding cash working capital for an electric general rate cases.

Submitted direct testimony in Case No. Docket No. 11-06006 on behalf of Nevada Power Company regarding cash working capital for an electric general rate case.

New Mexico Submitted testimony in support of filing of Advice Notice No. 60 on behalf of Kit Carson Electric Cooperative, Inc.

Submitted direct testimony in Case No. 15-00375-UT on behalf of Kit Carson Electric Cooperative, Inc. regarding revenue requirements, the need for a rate increase, class cost of service study, apportionment of the revenue increase to the classes of service, and rate design.

Submitted testimony in Advice Notices in Case No. 15-00087-UT on behalf of Jemez Mountain Electric Cooperative in support of tribal right of way cost recovery surcharge mechanisms.

Submitted direct testimony in Case. No. 16-00065-UT on behalf of Kit Carson Electric Cooperative in support of an application for continuation of its fuel and purchased power cost adjustment clause.

Submitted direct testimony, rebuttal testimony, and testimony in support of an uncontested comprehensive stipulation in Case No. 19-00170-UT on behalf of the New Mexico Public Regulation Commission Utility Division Staff regarding revenue requirements, class cost of service, allocation of the revenue increase, and rate design in a Southwest Power Company rate case.

Nova Scotia: Testified on behalf of Nova Scotia Power Company in NSUARB – NSPI – P-887 regarding the development and implementation of a fuel adjustment mechanism.

Submitted testimony in NSUARB – NSPI – P-884 regarding Nova Scotia Power Company's application to approve a demand-side management plan and cost recovery mechanism.

Submitted testimony in NSUARB – NSPI – P-888 regarding a general rate application filed by Nova Scotia Power Company.

Submitted testimony on behalf of Nova Scotia Power Company in the matter of the approval of backup, top-up and spill service for use in the Wholesale Open Access Market in Nova Scotia.

Submitted testimony in NSUARB – NSPI – P-884 (2) on behalf of Nova Scotia Power Company's regarding a demand-side management cost recovery mechanism.

Virginia: Submitted testimony in Case No. PUE-2008-00076 on behalf of Northern Neck Electric Cooperative regarding revenue requirements, class cost of service, jurisdictional separation and an excess facilities charge rider.

Submitted testimony in Case No. PUE-2009-00029 on behalf of Old Dominion Power Company regarding class cost of service, jurisdictional separation, allocation of the revenue increase, general rate design, time of use rates, and excess facilities charge rider.

Submitted testimony in Case No. PUE-2009-00065 on behalf of Craig-Botetourt Electric Cooperative regarding revenue requirements, class cost of service, jurisdictional separation and an excess facilities charge rider.

Submitted testimony in Case No. PUE-2011-00013 on behalf of Old Dominion Power Company regarding class cost of service, jurisdictional separation, allocation of the revenue increase, and rate design.

Exhibit WSS-2

Cost Components for Residential Service Rate RS

Kentucky Utilities Company

Unit Cost of Service Based on the Cost of Service Study
For the 12 Months Ended June 30, 2022

Rate RS

| Description | Amount | Production | | Transmission | Distribution | | Customer Service Expenses | Total |
|--|------------------|------------------|----------------|-----------------|----------------|------------------|---------------------------|------------------|
| | | Demand-Related | Energy-Related | Demand-Related | Demand-Related | Customer-Related | Customer-Related | |
| (1) Rate Base | \$ 2,457,262,896 | \$ 1,219,918,258 | \$ 27,493,896 | \$ 377,164,232 | \$ 304,728,690 | \$ 521,584,458 | \$ 6,373,362 | \$ 2,457,262,896 |
| (2) Rate Base Adjustments | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| (3) Rate Base as Adjusted | \$ 2,457,262,896 | \$ 1,219,918,258 | \$ 27,493,896 | \$ 377,164,232 | \$ 304,728,690 | \$ 521,584,458 | \$ 6,373,362 | \$ 2,457,262,896 |
| (4) Rate of Return | 4.74% | 4.74% | 4.74% | 4.74% | 4.74% | 4.74% | 4.74% | 4.74% |
| (5) Return | \$ 116,464,860 | \$ 57,819,458 | \$ 1,303,105 | \$ 17,876,142 | \$ 14,442,974 | \$ 24,721,108 | \$ 302,073 | \$ 116,464,860 |
| (6) Interest Expenses | \$ 51,506,086 | \$ 25,570,408 | \$ 576,293 | \$ 7,905,647 | \$ 6,387,344 | \$ 10,932,804 | \$ 133,590 | \$ 51,506,086 |
| (7) Net Income | \$ 64,958,773 | \$ 32,249,050 | \$ 726,813 | \$ 9,970,494 | \$ 8,055,630 | \$ 13,788,304 | \$ 168,483 | \$ 64,958,773 |
| (8) Income Taxes | \$ 20,618,122 | \$ 10,235,951 | \$ 230,693 | \$ 3,164,667 | \$ 2,556,883 | \$ 4,376,452 | \$ 53,477 | \$ 20,618,122 |
| (9) Operation and Maintenance Expenses | \$ 369,164,547 | \$ 54,624,948 | \$ 191,795,621 | \$ 25,536,905 | \$ 17,160,390 | \$ 37,627,884 | \$ 42,418,799 | \$ 369,164,547 |
| (10) Depreciation Expenses | \$ 164,107,492 | \$ 118,364,937 | \$ - | \$ 15,509,606 | \$ 11,180,449 | \$ 19,052,501 | \$ - | \$ 164,107,492 |
| (11) Other Taxes | \$ 23,280,695 | \$ 12,676,971 | \$ - | \$ 3,123,044 | \$ 2,765,995 | \$ 4,714,686 | \$ - | \$ 23,280,695 |
| (12) Curtailable Service Credit | \$ 7,647,274 | \$ 7,647,274 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ 7,647,274 |
| (13) Expense Adjustments - Prod. Demand | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| (14) Expense Adjustments - Energy | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| (15) Expense Adjustments - Trans. Demand | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| (16) Expense Adjustments - Distribution | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| (17) Expense Adjustments - Other | \$ 352,093 | \$ 174,798 | \$ 3,940 | \$ 54,043 | \$ 43,664 | \$ 74,736 | \$ 913 | \$ 352,093 |
| (18) Revenue Adjustments | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| (19) Expense Adjustments - Total | \$ 352,093 | \$ 174,798 | \$ 3,940 | \$ 54,043 | \$ 43,664 | \$ 74,736 | \$ 913 | \$ 352,093 |
| (20) Total Cost of Service | \$ 701,635,083 | \$ 261,544,337 | \$ 193,333,359 | \$ 65,264,407 | \$ 48,150,353 | \$ 90,567,366 | \$ 42,775,263 | \$ 701,635,083 |
| (21) Less: Misc Revenue - Prod Demand | \$ (583,332) | \$ (583,332) | \$ - | \$ - | \$ - | \$ - | \$ - | \$ (583,332) |
| (22) Less: Misc Revenue - Energy | \$ (3,060,544) | \$ - | \$ (3,060,544) | \$ - | \$ - | \$ - | \$ - | \$ (3,060,544) |
| (23) Less: Misc Revenue - Transmission | \$ (11,743,851) | \$ - | \$ - | \$ (11,743,851) | \$ - | \$ - | \$ - | \$ (11,743,851) |
| (24) Less: Misc Revenue - Other | \$ (6,488,247) | \$ (3,221,117) | \$ (72,596) | \$ (995,878) | \$ (804,617) | \$ (1,377,211) | \$ (16,828) | \$ (6,488,247) |
| (25) Less: Misc Revenue - Total | \$ (21,875,974) | \$ (3,804,449) | \$ (3,133,140) | \$ (12,739,729) | \$ (804,617) | \$ (1,377,211) | \$ (16,828) | \$ (21,875,974) |
| (26) Net Cost of Service | \$ 679,759,110 | \$ 257,739,888 | \$ 190,200,219 | \$ 52,524,678 | \$ 47,345,737 | \$ 89,190,155 | \$ 42,758,434 | \$ 679,759,110 |
| (27) Billing Units | | 5,943,619,831 | 5,943,619,831 | 5,943,619,831 | 5,943,619,831 | 5,308,105 | 5,308,105 | |
| (28) Unit Costs | | 0.043364127 | 0.032000738 | 0.008837153 | 0.007965808 | \$ 0.55 | \$ 0.26 | \$ 0.82 |

| | |
|----------------------------|------------|
| Customer Cost | \$ 0.82 |
| Infrastructure Energy Cost | \$ 0.06017 |
| Variable Energy Cost | \$ 0.03200 |

Louisville Gas and Electric Company

Unit Cost of Service Based on the Cost of Service Study
For the 12 Months Ended June 30, 2022

Rate RS

| Description | Amount | Production | | Transmission | Distribution | | Customer Service Expenses | Total |
|--|------------------|----------------|----------------|----------------|----------------|------------------|---------------------------|------------------|
| | | Demand-Related | Energy-Related | Demand-Related | Demand-Related | Customer-Related | Customer-Related | |
| (1) Rate Base | \$ 1,830,420,621 | \$ 957,680,114 | \$ 28,168,165 | \$ 164,114,791 | \$ 247,962,447 | \$ 428,194,391 | \$ 4,300,712 | \$ 1,830,420,621 |
| (2) Rate Base Adjustments | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| (3) Rate Base as Adjusted | \$ 1,830,420,621 | \$ 957,680,114 | \$ 28,168,165 | \$ 164,114,791 | \$ 247,962,447 | \$ 428,194,391 | \$ 4,300,712 | \$ 1,830,420,621 |
| (4) Rate of Return | 2.78% | 2.78% | 2.78% | 2.78% | 2.78% | 2.78% | 2.78% | |
| (5) Return | \$ 50,858,000 | \$ 26,609,018 | \$ 782,649 | \$ 4,559,908 | \$ 6,889,604 | \$ 11,897,326 | \$ 119,495 | \$ 50,858,000 |
| (6) Interest Expenses | \$ 40,093,733 | \$ 20,977,130 | \$ 616,999 | \$ 3,594,788 | \$ 5,431,396 | \$ 9,379,217 | \$ 94,203 | \$ 40,093,733 |
| (7) Net Income | \$ 10,764,267 | \$ 5,631,888 | \$ 165,650 | \$ 965,120 | \$ 1,458,208 | \$ 2,518,109 | \$ 25,291 | \$ 10,764,267 |
| (8) Income Taxes | \$ 10,344,723 | \$ 5,412,382 | \$ 159,194 | \$ 927,504 | \$ 1,401,373 | \$ 2,419,964 | \$ 24,306 | \$ 10,344,723 |
| (9) Operation and Maintenance Expenses | \$ 283,536,077 | \$ 53,383,070 | \$ 142,877,811 | \$ 16,306,536 | \$ 14,564,398 | \$ 35,738,396 | \$ 20,665,865 | \$ 283,536,077 |
| (10) Depreciation Expenses | 141,321,587 | 101,457,547 | - | 6,895,148 | 12,142,048 | 20,826,845 | - | 141,321,587 |
| (11) Other Taxes | 22,018,306 | 12,011,678 | - | 1,886,754 | 2,989,992 | 5,129,882 | - | 22,018,306 |
| (12) Curtailable Service Rider | 1,177,704 | 616,178 | 18,124 | 105,593 | 159,541 | 275,503 | 2,767 | 1,177,704 |
| (13) Expense Adjustments - Prod. Demand | - | - | - | - | - | - | - | - |
| (14) Expense Adjustments - Energy | - | - | - | - | - | - | - | - |
| (15) Expense Adjustments - Trans. Demand | - | - | - | - | - | - | - | - |
| (16) Expense Adjustments - Distribution | - | - | - | - | - | - | - | - |
| (17) Expense Adjustments - Other | 203,392 | 106,415 | 3,130 | 18,236 | 27,553 | 47,580 | 478 | 203,392 |
| (18) Revenue Adjustments | - | - | - | - | - | - | - | - |
| (19) Proforma Adjustments - Total | \$ 203,392 | \$ 106,415 | \$ 3,130 | \$ 18,236 | \$ 27,553 | \$ 47,580 | \$ 478 | \$ 203,392 |
| (20) Total Cost of Service | \$ 509,459,788 | \$ 199,596,287 | \$ 143,840,907 | \$ 30,699,678 | \$ 38,174,510 | \$ 76,335,495 | \$ 20,812,911 | \$ 509,459,788 |
| (21) Less: Misc Revenue - Prod Demand | \$ (317,551) | \$ (317,551) | | | | | | \$ (317,551) |
| (22) Less: Misc Revenue - Energy | (12,366,967) | - | (12,366,967) | - | - | - | - | (12,366,967) |
| (23) Less: Misc Revenue - Transmission | (5,722,158) | - | - | (5,722,158) | - | - | - | (5,722,158) |
| (24) Less: Misc Revenue - Other | (5,984,316) | (3,131,007) | (92,092) | (536,551) | (810,680) | (1,399,924) | (14,061) | (5,984,316) |
| (25) Less: Misc Revenue - Total | (24,390,993) | (3,448,559) | (12,459,059) | (6,258,710) | (810,680) | (1,399,924) | (14,061) | (24,390,993) |
| (26) Net Cost of Service | \$ 485,068,795 | \$ 196,147,729 | \$ 131,381,848 | \$ 24,440,968 | \$ 37,363,830 | \$ 74,935,571 | \$ 20,798,850 | \$ 485,068,795 |
| (27) Billing Units | | 4,049,109,440 | 4,049,109,440 | 4,049,109,440 | 4,049,109,440 | 4,530,684 | 4,530,684 | |
| (28) Unit Costs | | \$ 0.04844 | \$ 0.03245 | \$ 0.00604 | \$ 0.00923 | \$ 0.54 | \$ 0.15 | \$ 0.69 |

Customer Cost \$ 0.69
Infrastructure Energy Cost \$ 0.06371
Variable Energy Cost \$ 0.03245

Exhibit WSS-3

Cost Support for General Time-of-Date Service Rates

Kentucky Utilities Company
Louisville Gas and Electric Company
 Cost Support of GSTOD

| Infrastructure Cost | Kentucky Utilities Company | | | Louisville Gas and Electric Company | | |
|--|----------------------------|---------------|-------------------|-------------------------------------|---------------|-------------------|
| | Costs | kWH | Unit Cost | Costs | kWH | Unit Cost |
| Production Peak | \$ 104,295,799.93 | 334,720,632 | \$ 0.31159 | \$ 75,472,056 | 238,769,104 | \$ 0.31609 |
| Transmission | \$ 54,584,113.90 | 1,678,149,896 | \$ 0.03253 | \$ 43,589,923 | 1,197,088,880 | \$ 0.03641 |
| Distribution | \$ 39,953,463.73 | 1,678,149,896 | \$ 0.02381 | \$ 39,917,171 | 1,197,088,880 | \$ 0.03335 |
| Total Infrastructure Cost per kWh | | | \$ 0.10725 | | | \$ 0.13280 |
| Peak | | | \$ 0.31159 | | | \$ 0.31609 |
| Off-Peak | | | \$ 0.05633 | | | \$ 0.06976 |
| GTOD-E | | | | | | |
| Proposed GS Infrastructure Charge | | | \$ 0.09216 | | | \$ 0.09015 |
| Peak | | | \$ 0.26776 | | | \$ 0.21457 |
| Off-Peak | | | \$ 0.04841 | | | \$ 0.04735 |
| Proposed Residential Infrastructure Charge | | | \$ 0.06750 | | | \$ 0.07237 |
| Proposed General Service Infrastructure Charge | | | \$ 0.09216 | | | \$ 0.09015 |
| RTOD | | | | | | |
| Peak | | | \$ 10.37 | | | \$ 9.43 |
| Base | | | \$ 4.01 | | | \$ 4.31 |
| Infrastructure Energy | | | \$ 0.02683 | | | \$ 0.02095 |
| GTOD-D | | | | | | |
| Peak | | | \$ 14.16 | | | \$ 11.75 |
| Base | | | \$ 5.47 | | | \$ 5.37 |
| Infrastructure Energy | | | \$ 0.03663 | | | \$ 0.02610 |

Exhibit WSS-4

Cost Support for LED Fixture
and Underground Pole Charges

Kentucky Utilities Company

Cost Support for LED Fixtures and Underground Poles

| Company | OH/UG Poles | Property Type | kW per Light | Lumen | Useful Life | Total Installed Cost | Fixed Carrying Charge | Annual Carrying Cost | Annual Non-Fixture Maintenance Cost \$ | Annual Distribution Energy @ LE Rate 0.07178 | Total Annual Revenue Requirement | Monthly Rate |
|---------|-------------|---------------------|--------------|-------------|-------------|----------------------|-----------------------|----------------------|--|--|----------------------------------|--------------|
| KU | OH | Cobra | 0.071 | 6000-8200 | 25 \$ | 633.36 | 14.50% \$ | 91.82 \$ | 2.71 \$ | 20.39 \$ | 114.91 \$ | 9.58 |
| KU | OH | Cobra | 0.122 | 13000-16500 | 25 \$ | 695.99 | 14.50% \$ | 100.89 \$ | 2.71 \$ | 35.03 \$ | 138.63 \$ | 11.55 |
| KU | OH | Cobra | 0.194 | 22000-29000 | 25 \$ | 826.97 | 14.50% \$ | 119.88 \$ | 2.71 \$ | 55.70 \$ | 178.29 \$ | 14.86 |
| KU | OH | Open Bottom | 0.048 | 4500-6000 | 15 \$ | 451.89 | 17.16% \$ | 77.56 \$ | 2.71 \$ | 13.78 \$ | 94.05 \$ | 7.84 |
| KU | OH | Cobra | 0.022 | 2500-4000 | 25 \$ | 620.40 | 14.50% \$ | 89.94 \$ | 2.71 \$ | 6.32 \$ | 98.96 \$ | 8.25 |
| KU | OH | Directional (Flood) | 0.030 | 4500-6000 | 25 \$ | 815.79 | 14.50% \$ | 118.26 \$ | 2.71 \$ | 8.61 \$ | 129.58 \$ | 10.80 |
| KU | OH | Directional (Flood) | 0.096 | 14000-17500 | 25 \$ | 842.79 | 14.50% \$ | 122.18 \$ | 2.71 \$ | 27.56 \$ | 152.44 \$ | 12.70 |
| KU | OH | Directional (Flood) | 0.175 | 22000-28000 | 25 \$ | 881.18 | 14.50% \$ | 127.74 \$ | 2.71 \$ | 50.25 \$ | 180.69 \$ | 15.06 |
| KU | OH | Directional (Flood) | 0.297 | 35000-50000 | 25 \$ | 1,200.38 | 14.50% \$ | 174.01 \$ | 2.71 \$ | 85.27 \$ | 261.99 \$ | 21.83 |
| KU | UG | Cobra | 0.022 | 2500-4000 | 25 \$ | 289.67 | 14.50% \$ | 41.99 \$ | - \$ | 6.32 \$ | 48.31 \$ | 4.03 |
| KU | UG | Cobra | 0.071 | 6000-8200 | 25 \$ | 302.63 | 14.50% \$ | 43.87 \$ | - \$ | 20.39 \$ | 64.26 \$ | 5.35 |
| KU | UG | Cobra | 0.122 | 13000-16500 | 25 \$ | 365.26 | 14.50% \$ | 52.95 \$ | - \$ | 35.03 \$ | 87.979 \$ | 7.33 |
| KU | UG | Cobra | 0.194 | 22000-29000 | 25 \$ | 496.24 | 14.50% \$ | 71.94 \$ | - \$ | 55.70 \$ | 127.64 \$ | 10.64 |
| KU | UG | Colonial | 0.044 | 4000-7000 | 25 \$ | 503.67 | 14.50% \$ | 73.02 \$ | - \$ | 12.63 \$ | 85.65 \$ | 7.14 |
| KU | UG | Acorn | 0.040 | 4000-7000 | 25 \$ | 639.82 | 14.50% \$ | 92.75 \$ | - \$ | 11.48 \$ | 104.24 \$ | 8.69 |
| KU | UG | Contemporary | 0.057 | 4000-7000 | 25 \$ | 450.57 | 14.50% \$ | 65.32 \$ | - \$ | 16.37 \$ | 81.68 \$ | 6.81 |
| KU | UG | Contemporary | 0.087 | 8000-11000 | 25 \$ | 503.35 | 14.50% \$ | 72.97 \$ | - \$ | 24.98 \$ | 97.95 \$ | 8.16 |
| KU | UG | Contemporary | 0.143 | 13500-16500 | 25 \$ | 548.95 | 14.50% \$ | 79.58 \$ | - \$ | 41.06 \$ | 120.64 \$ | 10.05 |
| KU | UG | Contemporary | 0.220 | 21000-28000 | 25 \$ | 771.72 | 14.50% \$ | 111.87 \$ | - \$ | 63.17 \$ | 175.04 \$ | 14.59 |
| KU | UG | Contemporary | 0.380 | 45000-50000 | 25 \$ | 926.55 | 14.50% \$ | 134.32 \$ | - \$ | 109.11 \$ | 243.42 \$ | 20.29 |
| KU | UG | Directional (Flood) | 0.030 | 4500-6000 | 25 \$ | 617.89 | 14.50% \$ | 89.57 \$ | - \$ | 8.61 \$ | 98.19 \$ | 8.18 |
| KU | UG | Directional (Flood) | 0.096 | 14000-17500 | 25 \$ | 644.88 | 14.50% \$ | 93.49 \$ | - \$ | 27.56 \$ | 121.05 \$ | 10.09 |
| KU | UG | Directional (Flood) | 0.175 | 22000-28000 | 25 \$ | 683.27 | 14.50% \$ | 99.05 \$ | - \$ | 50.25 \$ | 149.30 \$ | 12.44 |
| KU | UG | Directional (Flood) | 0.297 | 35000-50000 | 25 \$ | 1,002.48 | 14.50% \$ | 145.33 \$ | - \$ | 85.27 \$ | 230.60 \$ | 19.22 |
| KU | UG | Victorian | 0.079 | 5800 | 25 \$ | 1,639.43 | 14.50% \$ | 237.66 \$ | - \$ | 22.68 \$ | 260.35 \$ | 21.70 |

| Company | OH/UG Poles | Property Type | Wattage | Lumen | Useful Life | Total Installed Cost | Fixed Carrying Charge | Annual Carrying Cost | Annual Non-Fixture Maintenance Cost | Total Annual Revenue Requirement | Monthly Rate |
|---------|-------------|------------------------------|---------|-------|-------------|----------------------|-----------------------|----------------------|-------------------------------------|----------------------------------|--------------|
| KU | Poles | Cobra | | | 28 \$ | 941.30 | 15.99% \$ | 150.54 \$ | 2.71 \$ | 153.25 \$ | 12.77 |
| KU | Poles | Contemporary | | | 28 \$ | 869.50 | 15.99% \$ | 139.06 \$ | 2.71 \$ | 141.76 \$ | 11.81 |
| KU | Poles | Post Top - Decorative Smooth | | | 28 \$ | 641.21 | 15.99% \$ | 102.55 \$ | 2.71 \$ | 105.25 \$ | 8.77 |
| KU | Poles | Post Top - Historic Fluted | | | 28 \$ | 1,083.67 | 15.99% \$ | 173.31 \$ | 2.71 \$ | 176.01 \$ | 14.67 |
| KU | Poles | Wood Pole | | | 28 \$ | 714.90 | 14.07% \$ | 100.57 \$ | 2.71 \$ | 103.28 \$ | 8.61 |

Louisville Gas & Electric Company

Cost Support for LED Fixtures and Underground Poles

| Company | OH/UG Poles | Property Type | kW per Light | Lumen | Useful Life | Total Installed Cost | Fixed Carrying Charge | Annual Carrying Cost | Annual Non-Fixture Maintenance Cost | Annual Distribution Energy @ LE Rate 0.07293 | Total Annual Revenue Requirement | Monthly Rate |
|---------|-------------|---------------------|--------------|-------------|-------------|----------------------|-----------------------|----------------------|-------------------------------------|--|----------------------------------|--------------|
| LG&E | OH | Cobra | 0.071 | 5500-8200 | 25 | \$ 677.69 | 14.71% | \$ 99.67 | \$ 5.25 | \$ 20.71 | \$ 125.63 | \$ 10.47 |
| LG&E | OH | Cobra | 0.122 | 13000-16500 | 25 | \$ 738.69 | 14.71% | \$ 108.64 | \$ 5.25 | \$ 35.59 | \$ 149.48 | \$ 12.46 |
| LG&E | OH | Cobra | 0.194 | 22000-29000 | 25 | \$ 866.26 | 14.71% | \$ 127.40 | \$ 5.25 | \$ 56.59 | \$ 189.24 | \$ 15.77 |
| LG&E | OH | Open Bottom | 0.048 | 4500-6000 | 15 | \$ 542.59 | 17.37% | \$ 94.27 | \$ 5.25 | \$ 14.00 | \$ 113.52 | \$ 9.46 |
| LG&E | OH | Cobra | 0.022 | 2500-4000 | 25 | \$ 665.07 | 14.71% | \$ 97.81 | \$ 5.25 | \$ 6.42 | \$ 109.48 | \$ 9.12 |
| LG&E | OH | Directional (Flood) | 0.03 | 4500-6000 | 25 | \$ 885.87 | 14.71% | \$ 130.29 | \$ 5.25 | \$ 8.75 | \$ 144.29 | \$ 12.02 |
| LG&E | OH | Directional (Flood) | 0.096 | 14000-17500 | 25 | \$ 912.16 | 14.71% | \$ 134.15 | \$ 5.25 | \$ 28.01 | \$ 167.41 | \$ 13.95 |
| LG&E | OH | Directional (Flood) | 0.175 | 22000-28000 | 25 | \$ 949.56 | 14.71% | \$ 139.65 | \$ 5.25 | \$ 51.05 | \$ 195.95 | \$ 16.33 |
| LG&E | OH | Directional (Flood) | 0.297 | 35000-50000 | 25 | \$ 1,260.44 | 14.71% | \$ 185.38 | \$ 5.25 | \$ 86.64 | \$ 277.26 | \$ 23.11 |
| LG&E | UG | Cobra | 0.022 | 2500-4000 | 25 | \$ 308.90 | 14.71% | \$ 45.43 | \$ - | \$ 6.42 | \$ 51.85 | \$ 4.32 |
| LG&E | UG | Cobra | 0.071 | 5500-8200 | 25 | \$ 321.52 | 14.71% | \$ 47.29 | \$ - | \$ 20.71 | \$ 68.00 | \$ 5.67 |
| LG&E | UG | Cobra | 0.122 | 13000-16500 | 25 | \$ 382.52 | 14.71% | \$ 56.26 | \$ - | \$ 35.59 | \$ 91.848 | \$ 7.65 |
| LG&E | UG | Cobra | 0.194 | 22000-29000 | 25 | \$ 510.09 | 14.71% | \$ 75.02 | \$ - | \$ 56.59 | \$ 131.61 | \$ 10.97 |
| LG&E | UG | Colonial | 0.044 | 4000-7000 | 25 | \$ 517.33 | 14.71% | \$ 76.09 | \$ - | \$ 12.84 | \$ 88.92 | \$ 7.41 |
| LG&E | UG | Acorn | 0.04 | 4000-7000 | 25 | \$ 510.09 | 14.71% | \$ 75.02 | \$ - | \$ 11.67 | \$ 86.69 | \$ 7.22 |
| LG&E | UG | Contemporary | 0.057 | 4000-7000 | 25 | \$ 465.61 | 14.71% | \$ 68.48 | \$ - | \$ 16.63 | \$ 85.11 | \$ 7.09 |
| LG&E | UG | Contemporary | 0.087 | 8000-11000 | 25 | \$ 517.02 | 14.71% | \$ 76.04 | \$ - | \$ 25.38 | \$ 101.42 | \$ 8.45 |
| LG&E | UG | Contemporary | 0.143 | 13500-16500 | 25 | \$ 561.43 | 14.71% | \$ 82.57 | \$ - | \$ 41.72 | \$ 124.29 | \$ 10.36 |
| LG&E | UG | Contemporary | 0.22 | 21000-28000 | 25 | \$ 778.39 | 14.71% | \$ 114.48 | \$ - | \$ 64.18 | \$ 178.66 | \$ 14.89 |
| LG&E | UG | Contemporary | 0.38 | 45000-50000 | 25 | \$ 929.19 | 14.71% | \$ 136.66 | \$ - | \$ 110.85 | \$ 247.51 | \$ 20.63 |
| LG&E | UG | Directional (Flood) | 0.03 | 4500-6000 | 25 | \$ 617.43 | 14.71% | \$ 90.81 | \$ - | \$ 8.75 | \$ 99.56 | \$ 8.30 |
| LG&E | UG | Directional (Flood) | 0.096 | 14000-17500 | 25 | \$ 643.72 | 14.71% | \$ 94.67 | \$ - | \$ 28.01 | \$ 122.68 | \$ 10.22 |
| LG&E | UG | Directional (Flood) | 0.175 | 22000-28000 | 25 | \$ 681.12 | 14.71% | \$ 100.17 | \$ - | \$ 51.05 | \$ 151.22 | \$ 12.60 |
| LG&E | UG | Directional (Flood) | 0.297 | 35000-50000 | 25 | \$ 992.00 | 14.71% | \$ 145.90 | \$ - | \$ 86.64 | \$ 232.54 | \$ 19.38 |
| LG&E | UG | Victorian | 0.039 | 4000-7000 | 25 | \$ 2,051.33 | 14.71% | \$ 301.70 | \$ - | \$ 11.38 | \$ 313.07 | \$ 26.09 |
| LG&E | UG | London | 0.079 | 4000-7000 | 25 | \$ 2,101.72 | 14.71% | \$ 309.11 | \$ - | \$ 23.05 | \$ 332.15 | \$ 27.68 |

| Company | OH/UG Poles | Property Type | Wattage | Lumen | Useful Life | Total Installed Cost | Fixed Carrying Charge | Annual Carrying Cost | Annual Non-Fixture Maintenance Cost | Total Annual Revenue Requirement | Monthly Rate |
|---------|-------------|------------------------------|---------|-------|-------------|----------------------|-----------------------|----------------------|-------------------------------------|----------------------------------|--------------|
| LG&E | Poles | Cobra | | | 28 | \$ 1,878.32 | 16.82% | \$ 315.87 | \$ 5.05 | \$ 320.92 | \$ 26.74 |
| LG&E | Poles | Contemporary (Short) | | | 28 | \$ 1,253.31 | 16.82% | \$ 210.76 | \$ 5.05 | \$ 215.81 | \$ 17.98 |
| LG&E | Poles | Contemporary (Tall) | | | 28 | \$ 1,629.97 | 16.82% | \$ 274.11 | \$ 5.05 | \$ 279.16 | \$ 23.26 |
| LG&E | Poles | Post Top - Decorative Smooth | | | 28 | \$ 1,109.18 | 16.82% | \$ 186.53 | \$ 5.05 | \$ 191.58 | \$ 15.96 |
| LG&E | Poles | Post Top - Historic Fluted | | | 28 | \$ 1,375.23 | 16.82% | \$ 231.27 | \$ 5.05 | \$ 236.32 | \$ 19.69 |
| LG&E | Poles | Wood Pole | | | 28 | \$ 559.68 | 14.28% | \$ 79.92 | \$ 5.05 | \$ 84.97 | \$ 7.08 |

Exhibit WSS-5

Cost Support for
LED Conversion Fee

Kentucky Utilities Company
Determination of Conversion Fee

| | | |
|------------------------------------|---------|----------------|
| Number of Fixtures | 172,819 | |
| 2020 Net Book Value | | \$ 73,343,106 |
| Estimated NBV for Poles | 53.54% | \$ 39,269,427 |
| Estimated NBV for Fixtures | | \$ 34,073,680 |
| NBV per Fixture | | \$ 197.16 |
| 5 Year Carrying Charge Rate | | |
| Overall Rate of Return | | 7.206% |
| Depreciation | | 20.000% |
| Income Taxes | | 1.770% |
| Property Taxes | | 1.511% |
| Carrying Charge Rate | | <u>30.487%</u> |
| Annual Conversion Fee | | \$ 60.11 |
| Monthly Conversion Fee | | \$ 5.01 |
| Salvage Portion of Conversion Fee | | \$ 3.29 |
| Revenue Portion of Conversion Fee | | \$ 1.72 |

Louisville Gas & Electric Company

Determination of Conversion Fee

| | | |
|----------------------------|--------|---------------|
| Number of Fixtures | 88,567 | |
| 2020 Net Book Value | | \$ 73,065,258 |
| Estimated NBV for Poles | 66.39% | \$ 48,506,556 |
| Estimated NBV for Fixtures | | \$ 24,558,702 |
| NBV per Fixture | | \$ 277.29 |

5 Year Carrying Charge Rate

| | | |
|------------------------|--|----------------|
| Overall Rate of Return | | 7.165% |
| Depreciation | | 20.000% |
| Income Taxes | | 1.768% |
| Property Taxes | | 1.718% |
| Carrying Charge Rate | | <u>30.651%</u> |

| | | |
|-----------------------------------|----|-------|
| Annual Conversion Fee | \$ | 84.99 |
| Monthly Conversion Fee | \$ | 7.08 |
| Salvage Portion of Conversion Fee | \$ | 4.62 |
| Revenue Portion of Conversion Fee | \$ | 2.46 |

Exhibit WSS-6

Westar's Residential Distributed Generation Rate

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THE STATE CORPORATION COMMISSION OF KANSAS

EVERGY KANSAS CENTRAL, INC. & EVERGY KANSAS SOUTH, INC., d/b/a EVERGY KANSAS CENTRAL SCHEDULE RS-DG

(Name of Issuing Utility)

Replacing Schedule RS-DG Sheet 1

EVERGY KANSAS CENTRAL RATE AREA

(Territory to which schedule is applicable)

which was filed September 28, 2018

No supplement or separate understanding shall modify the tariff as shown hereon

Sheet 1 of 4 Sheets

RESIDENTIAL STANDARD DISTRIBUTED GENERATION

AVAILABLE

Electric Service is available under this rate schedule at points on the Company's existing distribution system to customers using electric service for residential purposes. Any customer-generator operating or adding generation under an interconnection agreement connecting to Evergy Kansas Central's distribution system after October 1, 2018 must take service under this rate schedule.

APPLICABLE


Applicable to residential customers that have dwelling unit(s) each having separate kitchen facilities, sleeping facilities, living facilities and permanent provisions for sanitation. This rate schedule is restricted to residential electric service used principally for domestic purposes in customer's household, home, detached garage on the same premise as customer's home, or place of dwelling for the maintenance or improvement of customer's quality of life. Service to customers in rural areas through a single meter under this schedule may also use electric service in farm buildings for ordinary farm use providing that such buildings are adjacent to the customer's dwelling unit. However, this schedule is not applicable for crop irrigation, commercial dairies, hatcheries, feed lots, feed mills or any other commercial enterprise. This schedule is not applicable to backup, breakdown, standby, supplemental, short term, resale or shared electric service.

CHARACTER OF SERVICE

Alternating current, 60 hertz, single phase, at nominal voltages of 120 or 120/240 volts.

Issued _____
Month Day Year

Effective August 6 2019
Month Day Year

By 
Darrin Ives, Vice President

19-WSEE-474-TAR
Approved *JWP*
Kansas Corporation Commission
August 6, 2019
/s/ Lynn Retz

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THE STATE CORPORATION COMMISSION OF KANSAS

EVERGY KANSAS CENTRAL, INC. & EVERGY KANSAS SOUTH, INC., d/b/a EVERGY KANSAS CENTRAL SCHEDULE RS-DG

(Name of Issuing Utility)

Replacing Schedule RS-DG Sheet 2

EVERGY KANSAS CENTRAL RATE AREA

(Territory to which schedule is applicable)

which was filed September 28, 2018

No supplement or separate understanding shall modify the tariff as shown hereon

Sheet 2 of 4 Sheets

RESIDENTIAL STANDARD DISTRIBUTED GENERATION

ELECTRIC SERVICE

NET MONTHLY BILL

| | |
|-------------------|-----------------|
| BASIC SERVICE FEE | \$14.50 |
| ENERGY CHARGE | 4.5840¢ per kWh |
| DEMAND CHARGE | |

Winter Period - Demand set in the billing months of October through May.
\$3.00 per kW

Summer Period - Demand set in the billing months of June through September.
\$9.00 per kW

Plus all applicable adjustments and surcharges.

MINIMUM MONTHLY BILL

The Basic Service Fee, plus the minimum specified in the Electric Service Agreement, plus all applicable adjustments and surcharges.

BILLING DEMAND


Customer's average kilowatt load during the 60-minute period of maximum use that occurs in the demand billing period during the month.

DETERMINATION OF PEAK BILLING PERIOD

For purposes of this rate schedule, the demand billing period shall be daily the hours of 2:00 pm through 7:00 pm Central Time, except for weekends, New Year's Day, Memorial Day, Independence Day, Labor Day, Thanksgiving Day, and Christmas Day.

Issued _____
Month Day Year

Effective August 6 2019
Month Day Year

By  _____
Darrin Ives, Vice President

19-WSEE-474-TAR
Approved *JWP*
Kansas Corporation Commission
August 6, 2019
/s/ Lynn Retz

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THE STATE CORPORATION COMMISSION OF KANSAS

EVERGY KANSAS CENTRAL, INC. & EVERGY KANSAS SOUTH, INC., d/b/a EVERGY KANSAS CENTRAL SCHEDULE RS-DG

(Name of Issuing Utility)

Replacing Schedule RS-DG Sheet 3

EVERGY KANSAS CENTRAL RATE AREA

(Territory to which schedule is applicable)

which was filed September 28, 2018

No supplement or separate understanding shall modify the tariff as shown hereon

Sheet 3 of 4 Sheets

RESIDENTIAL STANDARD DISTRIBUTED GENERATION

ADJUSTMENTS AND SURCHARGES

The rates hereunder are subject to adjustment as provided in the following schedules:

1. Retail Energy Cost Adjustment
2. Property Tax Surcharge
3. Transmission Delivery Charge
4. Environmental Cost Recovery Rider
5. Renewable Energy Program Rider
6. Energy Efficiency Rider
7. Tax Adjustment


Plus all applicable adjustments and surcharges.

DEFINITIONS AND CONDITIONS

1. The initial term of service under this rate schedule shall be one year. Company reserves the right to require the customer to execute an Electric Service Agreement with an additional charge, or special minimum and or a longer initial term when additional facilities are required to serve such customer.
2. A Customer-Generator is the owner or operator of a facility which:
 - a. Is located on premises owned, operated, leased, or otherwise controlled by the Customer-Generator and provides power to a facility located on that same premise;
 - b. Is interconnected and operates in parallel phase and synchronization with the Company facilities;
 - c. Is intended primarily to offset part or all of the Customer-Generator's own electrical energy requirements; and
 - d. Contains a mechanism, approved by the Company that automatically disables the unit and interrupts the flow of electricity back onto the Company's electric lines in the event that service to the Customer-Generator is interrupted.

Issued _____
Month Day Year

Effective August 6 2019
Month Day Year

By 
Darrin Ives, Vice President

19-WSEE-474-TAR
Approved *JWP*
Kansas Corporation Commission
August 6, 2019
/s/ Lynn Retz

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THE STATE CORPORATION COMMISSION OF KANSAS

EVERGY KANSAS CENTRAL, INC. & EVERGY KANSAS SOUTH, INC., d/b/a EVERGY KANSAS CENTRAL SCHEDULE RS-DG

(Name of Issuing Utility)

Replacing Schedule RS-DG Sheet 4

EVERGY KANSAS CENTRAL RATE AREA

(Territory to which schedule is applicable)

which was filed September 28, 2018

No supplement or separate understanding shall modify the tariff as shown hereon


Sheet 4 of 4 Sheets

RESIDENTIAL STANDARD DISTRIBUTED GENERATION

- 3. Individual motor units shall not exceed five horsepower, unless otherwise agreed upon prior to installation.
- 4. Service under this rate schedule is subject to Company's General Terms and Conditions presently on file with the State Corporation Commission of Kansas and any modification subsequently approved.
- 5. All provisions of this rate schedule are subject to changes made by order of the regulatory authority having jurisdiction.

Issued _____
Month Day Year

Effective August 6 2019
Month Day Year

By 
Darrin Ives, Vice President

19-WSEE-474-TAR
Approved JWP
Kansas Corporation Commission
August 6, 2019
/s/ Lynn Retz

Exhibit WSS-7

Kansas Corporation Commission's Order Regarding Distributed Generation

**BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS**

Before Commissioners: Pat Apple, Chairman
Shari Feist Albrecht
Jay Scott Emler

In the Matter of the General Investigation)
to Examine Issues Surrounding Rate Design) Docket No. 16-GIME-403-GIE
for Distributed Generation Customers.)

FINAL ORDER

This matter comes before the State Corporation Commission of the State of Kansas (Commission) for consideration and decision. Having reviewed the pleadings and record, the Commission makes the following findings:

I. Background

1. On July 12, 2016, the Commission issued an Order Opening General Investigation to examine various issues surrounding rate structure for distributed generation (DG) customers.¹ The Commission stated its intent to have a thorough and thoughtful discussion of the appropriate rate structure for DG including the quantifiable costs and quantifiable benefits of DG.² The Commission named all Kansas electric public utilities, subject to the Commission’s jurisdiction over retail rates,³ as parties to the docket and also granted parties an opportunity to provide evidence showing that costs and benefits can be quantified and allocated in a manner which will result in just and reasonable rates for DG customers.⁴

¹ Order Opening General Investigation, p. 5 (July 12, 2016).

² *Id.*

³ Westar Energy, Inc. and Kansas Gas and Electric Company (collectively, Westar), Kansas City Power & Light Company (KCP&L), Southern Pioneer Electric Company (Southern Pioneer), Midwest Energy, Inc. (Midwest Energy), Empire District Electric Company (Empire).

⁴ Order Opening General Investigation, p. 5.

2. On July 14, 2017, the Commission issued orders granting intervention to Cromwell Environmental, Inc. (Cromwell), the Citizens Utility Ratepayer Board (CURB), The Alliance for Solar Choice, Sunflower Electric Power Corporation (Sunflower) and Mid-Kansas Electric Company (Mid-Kansas), and Brightergy, LLC (Brightergy).

3. On September 1, 2016, the Commission issued orders granting intervention to the Kansas Electric Cooperatives, Inc. (KEC), the Climate and Energy Project (CEP), and IBEW Local Union No. 304 (IBEW).

4. On September 29, 2016, the Commission issued an order granting intervention to United Wind, Inc. (United Wind).

5. On February 16, 2017, the Commission issued an Order Setting Procedural Schedule. The order set a schedule for the parties to file comments, engage in roundtable discussions, and participate in an evidentiary hearing.⁵

6. On March 17, 2017, Midwest Energy,⁶ Southern Pioneer,⁷ which was joined by KEC, Westar,⁸ Brightergy,⁹ CEP,¹⁰ KCP&L,¹¹ United Wind,¹² Cromwell,¹³ Sunflower and Mid-

⁵ Order Setting Procedural Schedule, p. 3 (Feb. 16, 2017).

⁶ Initial Comments of Midwest Energy, Inc., (March 17, 2017) (Initial Comments Midwest Energy).

⁷ Initial Comments of Southern Pioneer Electric Company Joined by the Kansas Electric Cooperatives, Inc., (March 17, 2017) (Initial Comments Southern Pioneer and KEC).

⁸ Initial Comments of Westar Energy, Inc. and Kansas Gas and Electric Company Regarding Cost-Based Rates for Customers with Distributed Generation, (March 17, 2017) (Initial Comments Westar).

⁹ Brightergy elected not to provide a sponsoring witness for its comments and later withdrew its comments from the evidentiary record. Brightergy requested its comments be included with the public comments.

¹⁰ Testimony of Dorothy Barnett on Behalf of the Climate + Energy Project, (March 17, 2017) (Initial Comments CEP).

¹¹ Initial Comments of Kansas City Power & Light Company, (March 17, 2017) (Initial Comments KCP&L).

¹² United Wind elected not to provide a sponsoring witness for its comments and later withdrew its comments from the evidentiary record. United Wind requested its comments be included with the public comments.

¹³ Initial Comments of Cromwell Environmental, (March 17, 2017) (Initial Comments Cromwell).

Kansas,¹⁴ CURB,¹⁵ Empire,¹⁶ and Commission Utilities Staff¹⁷ (Staff) filed their initial Comments.

7. On May 5, 2017, Southern Pioneer,¹⁸ Westar,¹⁹ Midwest,²⁰ Staff,²¹ Sunflower and Mid-Kansas,²² KCP&L,²³ Empire,²⁴ Brightergy,²⁵ Cromwell,²⁶ IBEW 304,²⁷ and CEP²⁸ filed their reply comments.

8. On June 16, 2017, Staff, Westar, KCP&L, Sunflower, Mid-Kansas, Southern Pioneer, KEC, Midwest Energy, Empire, Brightergy, United Wind, and IBEW 304 (Joint Movants) filed a Motion to Approve Non-Unanimous Stipulation and Agreement (S&A).

9. Also on June 16, 2017, the Parties filed a List of Contested Issues.

10. On June 20, 2017, Westar,²⁹ KCP&L,³⁰ Southern Pioneer and KEC,³¹ and Staff³² filed testimony in support of the Non-Unanimous Stipulation and Agreement.

¹⁴ Initial Comments of Sunflower Electric Power Corporation and Mid-Kansas Electric Company, LLC, (March 17, 2017) (Initial Comments of Sunflower and Mid-Kansas).

¹⁵ Notice of Filing of CURB'S Initial Comments, (March 17, 2017) (Initial Comments CURB).

¹⁶ Affidavit of William G. Eichman on Behalf of The Empire District Electric Company, (March 17, 2017) (Initial Comments Empire).

¹⁷ Notice of Filing Staff's Verified Initial Comments (March 17, 2017) (Initial Comments Staff).

¹⁸ Reply Comments of Southern Pioneer Electric Company, (May 5, 2017) (Reply Comments Southern Pioneer).

¹⁹ Reply Comments of Westar Energy, Inc. and Kansas Gas and Electric Company Regarding Cost-Based Rates for Customers with Distributed Generation, (May 5, 2017) (Reply Comments Westar).

²⁰ Reply Comments of Midwest Energy, Inc., (May 5, 2017) (Reply Comments Midwest).

²¹ Notice of Filing Staff's Verified Reply Comments, (May 5, 2017) (Reply Comments Staff).

²² Reply Comments of Sunflower Electric Power Corporation and Mid-Kansas Electric Company, LLC, (May 5, 2017) (Reply Comments Sunflower and Mid-Kansas).

²³ Reply Comments of Kansas City Power & Light Company, (May 5, 2017) (Reply Comments KCP&L).

²⁴ Affidavit of William G. Eichman Supporting Reply Comments on Behalf of The Empire District Electric Company, (May 5, 2017) (Reply Comments Empire).

²⁵ Brightergy elected not to provide a sponsoring witness for its comments and later withdrew its comments from the evidentiary record. Brightergy requested its comments be included with the public comments.

²⁶ Reply Comments of Cromwell Environmental, (May 5, 2017) (Reply Comments Cromwell).

²⁷ IBEW 304 elected not to provide a sponsoring witness for its comments and later withdrew its comments from the evidentiary record. IBEW 304 requested its comments be included with the public comments.

²⁸ Reply Comments of Climate and Energy, (May 5, 2017) (Reply Comments CEP).

²⁹ Testimony of Jeff Martin in Support of Stipulation and Agreement – Westar Energy, Inc. (June 20, 2017) (Testimony in Support Martin); On June 26, 2017, Westar late filed the Rebuttal Testimony of Ahmad Faruqui in Support of Stipulation and Agreement (Testimony in Support Faruqui).

³⁰ Testimony in Support of the Settlement Agreement of Bradley D. Lutz on behalf of Kansas City Power & Light Company (June 20, 2017) (Testimony in Support Lutz).

11. On June 20, 2017, CURB,³³ Cromwell,³⁴ and CEP,³⁵ (collectively the Opposing Parties) filed testimony in opposition to the Non-Unanimous Stipulation and Agreement.

II. Legal Standard

12. Every public utility in Kansas is required to provide reasonably efficient and sufficient service and establish just and reasonable rates.³⁶ Just and reasonable rates are those that fall within a “zone of reasonableness,” which balances the interests of present and future ratepayers, and the public interest.³⁷ The Kansas Supreme Court has recognized that “the touchstone of public utility law is the rule that one class of consumers shall not be burdened with costs created by another class.”³⁸ The Commission may in addition to cost-causation, consider matters of public policy, such as gradualism to minimize rate shock, revenue stability for the company, economic development, and energy efficiency.³⁹ Both federal and state courts have been clear that rates must be based on costs and supported by substantial competent evidence.⁴⁰ Substantial competent evidence is that which possesses something of substance and relevant consequence, and which furnishes a substantial basis of fact from which the issues can

³¹ Testimony in Support of Stipulation and Agreement Prepared by Richard J. Macke (June 20, 2017) (Testimony in Support Macke).

³² Testimony in Support of the Non-Unanimous Stipulation and Agreement Prepared by Robert H. Glass (June 20, 2017) (Testimony in Support Glass).

³³ Testimony in Opposition to Non-Unanimous Stipulation and Agreement of Cary Catchpole on Behalf of CURB (Jun. 20, 2017) (Testimony in Opposition Catchpole); Testimony in Opposition to Non-Unanimous Stipulation and Agreement of Brian Kalcic on Behalf of CURB (Jun. 20, 2017) (Testimony in Opposition Kalcic).

³⁴ Testimony of Aron Cromwell in Opposition to Non-Unanimous Stipulation and Agreement (Jun. 20, 2017) (Testimony in Opposition Cromwell).

³⁵ Testimony of the Climate and Energy Project Addressing Non-Unanimous Settlement (Jun. 20, 2017) (Testimony in Opposition CEP).

³⁶ K.S.A. 66-101b.

³⁷ *Kansas Gas and Elec. Co. v. Kansas Corp. Comm’n.*, 239 Kan. 483, 488 (1986).

³⁸ *Jones v. Kansas Gas & Electric Co.*, 222 Kan. 390, 401 (1977).

³⁹ Docket No. 12-KCPE-764-RTS (Aug. 22, 2012); Docket No. 16-KCPE-446-TAR (Jun. 22, 2017); *See also, Midwest Gas Users Ass’n v. Kansas Corp. Comm’n.*, 3 Kan. App.2d 376, 380 (1979).

⁴⁰ *Federal Power Comm’n v. Hope Natural Gas Co.*, 320 U.S. 591, 603 (1944); *Kansas Gas and Electric Co.*, 239 Kan. At 501; *Zinke & Trumbo, Ltd. v. State Corp. Comm’n.*, 242 Kan. 470, 475 (1988).

reasonably be resolved.⁴¹ A decision of the Commission is unsupported by substantial competent evidence “only when the evidence shows the [Commission’s] determination ‘is so wide of the mark as to be outside the realm of fair debate.’”⁴² The Kansas Supreme Court has also stated that the Commission “is not obligated to render its finding of fact in minute detail ... [h]owever, we require its findings to be specific enough to allow judicial review of the reasonableness of the order.”⁴³

13. The law generally favors the compromise and settlement of disputes.⁴⁴ However, the Commission must make an independent finding that the settlement is supported by substantial competent evidence in the record as a whole, that the settlement will establish just and reasonable rates, and the settlement is in the public interest.⁴⁵

14. The Commission has established a five-part test to determine the reasonableness of proposed settlement agreements. The five parts are rooted in the Commission’s organic statutes,⁴⁶ the Kansas Administrative Procedure Act,⁴⁷ and the Kansas Act for Judicial Review and Civil Enforcement of Agency Actions.⁴⁸ The five parts are:

- a. Whether there was an opportunity for the opposing party to be heard on their reasons for opposition to the stipulation and agreement;
- b. whether the stipulation and agreement is supported by substantial competent evidence;

⁴¹ *Farmland Indus., Inc. v. Kansas Corp. Comm’n.*, 25 Kan.App.2d 849, 852 (1999).

⁴² *Zinke & Trumbo, Ltd. v. Kansas Corp. Comm’n.*, 242 Kan. 470, 474 (1988) (quoting *Kansas-Nebraska Natural Gas Co. v. Kansas Corp. Comm’n.*, 217 Kan. 604, 617).

⁴³ *Id.* at 475.

⁴⁴ *Krantz v. Univ. of Kansas*, 271 Kan. 234, 241-42 (2001).

⁴⁵ *Citizens’ Utility Ratepayer Board v. Kansas Corp. Comm’n.*, 28 Kan.App.2d 313, 316, (2000) *rev. denied* March 20, 2001.

⁴⁶ See K.S.A. 66-101b (providing the Commission with the power to “require all electric public utilities governed by this act to establish and maintain just and reasonable rates”).

⁴⁷ See, K.S.A. 77-501 *et seq.*

⁴⁸ See, K.S.A. 77-601 *et seq.*

- c. whether the stipulation and agreement conforms with applicable law;
- d. whether the stipulation and agreement results in just and reasonable rates;
- e. whether the results of the stipulation and agreement are in the public interest, including the interest of the customers represented by the party not consenting to the agreement.⁴⁹

III. Findings and Conclusions

15. The Commission finds the intent and purpose of this general investigation has shifted slightly from when it was first opened. Staff initially stated the goal of this generic docket was to determine the appropriate rate structure for DG customers by evaluating the costs and benefits of DG, as well as by examining potential rate design alternatives for DG customers.⁵⁰ Though Staff recommended the Commission not change current rates through this proceeding, Staff did recommend the Commission make its findings in this docket binding, with specific tariff changes to be made in utility-specific docket filings.⁵¹ However, the testimony in the evidentiary hearing suggested the parties were less interested in binding action by the Commission and more interested in guidance from the Commission regarding the appropriate direction of DG rate design.⁵² This position was later repeated during briefing.⁵³

⁴⁹ Order Approving Contested Settlement Agreement, Docket No. 08-ATMG-280-RTS, p. 5 (May 12, 2008).

⁵⁰ Staff's Report and Recommendation p. 8 (March 11, 2016).

⁵¹ *Id.* at pp. 7-8.

⁵² Tr. Vol. 1, p. 177 lns. 18-24; p. 178 lns. 16-19; pp. 126-127; pp. 178-179; pp. 180-82; p. 183 lns. 4-20; Tr. Vol. 2, p. 335.

⁵³ Reply Brief of Commission Staff, pp.6-7 (Aug. 25, 2017) (Nothing in the S&A limits or restricts a utility or the Commission to using a certain rate design. As discussed at hearing, Staff views the enumeration of rate design option in Paragraph 11 of the Stipulation and Agreement as merely that: options; not prescriptive requirements); Reply Brief of Citizens' Utility Ratepayer Board, p. 10 (Aug. 25, 2017); Post-Hearing Reply Brief of Kansas City Power & Light Company, p. 12 (Aug. 25, 2017).

16. With this request for guidance in mind, the Commission reviews the S&A utilizing the Commission's five-part question analysis of non-unanimous settlement agreements.

Whether there was an opportunity for the opposing party to be heard on their reasons for opposition to the stipulation and agreement?

17. The Commission finds the Opposing Parties each filed testimony in opposition to the S&A⁵⁴ and fully participated during the evidentiary hearing, including the cross-examination of the witnesses who testified in support of the S&A. The Commission finds therefore the Opposing Parties were granted an opportunity for their reasons for opposition to the S&A to be heard.

Whether the stipulation and agreement is supported by substantial competent evidence?

18. The Commission finds the S&A is specifically supported by the testimony of five witnesses through pre-filed supporting testimony,⁵⁵ live testimony at the evidentiary hearing, and the sworn pre-filed comments of the supporting parties.⁵⁶ Therefore, the Commission finds there to be sufficient evidence from which to make a decision.⁵⁷

19. The S&A requests the Commission adopt nine substantive findings, which will be addressed below.

⁵⁴ See *Generally*, Testimony in Opposition CEP; Testimony in Opposition Cromwell; Testimony in Opposition Kalcic; Testimony in Opposition Catchpole.

⁵⁵ See *Generally*, Testimony in Support Glass; Testimony in Support Martin; Testimony in Support Faruqui; Testimony in Support Lutz; Testimony in Support Macke.

⁵⁶ See, Reply Comments Westar; Reply Comments Empire; Reply Comments KCP&L; Reply Comments Sunflower and Mid-Kansas; Reply Comments Midwest Energy; Reply Comments KEC; Reply Comments Southern Pioneer; Reply Comments Staff; Initial Comments Staff.

⁵⁷ The omission from this Order of any argument or portion of the record raised by the participants in their briefs does not mean that it has not been considered. All such arguments have been evaluated and found to either lack merit or significance to the extent that their inclusion would only tend to lengthen this Order without altering its substance or effect.

20. First, the Commission finds DG customers should be uniquely identified within the ratemaking process because of their potentially significant different usage characteristics.⁵⁸ The Commission finds the unique identification of DG customers within a class or sub-class is the key to properly recognizing the cost and quantifiable benefits of DG.⁵⁹ Utilities may create a separate residential class or sub-class for DG customers with their own rate design, which appropriately recovers the fixed costs of providing service to residential private DG customers, or a utility may continue to serve residential private DG customers within an existing residential rate class if the utility determines there are too few DG customers to justify a separate residential private DG class or sub-class or determines other justification exists to retain those customers in the existing rate class. A separate rate class for DG customers is not meant to punish those customers, rather such a class would serve to provide clarity for both utilities and customers.

21. Specific to Westar, the Commission finds Westar's Distributed Generation Residential Rate Schedule implemented in Westar's last rate case shall remain in place and effective for all residential customers installing distributed generation on or after October 28, 2015, and shall be treated as a separate class for purposes of future class cost of service studies and ratemaking generally.

22. Second, the Commission finds the current two-part residential rate design is problematic for utilities and residential private DG customers because DG customers use the

⁵⁸ Initial Comments Staff, p. 16, ¶ 41; Reply Comments of Commission Staff, pp. 5-6; Comments of Cary Catchpole for the Citizens' Utility Ratepayer Board on Distributed Generation Policy Matters, p. 7, ¶ 11, pp. 8-9, ¶ 12-13, (Mar. 17, 2017); Comments of Brian Kalcic for the Citizens' Utility Ratepayer Board on Distributed Generation Rate Design, p. 8, (Mar. 17, 2017); Reply Comments Kalcic, pp. 2-4; Initial Comments Westar Energy, pp. 3-8, (Mar. 17, 2017); Reply Comments Westar, pp. 3-6, Initial Comments Empire District Electric Company, pp. 2-3, Reply Comments Empire, p. 1, pp. 3-4; Initial Comments Sunflower and Mid-Kansas, pp. 2-3; Initial Comments Southern Pioneer and KEC, p. 5, p. 7, ¶ 17; Reply Comments Southern Pioneer, p. 8, ¶¶ 19-20, (May 5, 2017); Initial Comments Midwest Energy, pp. 3, 5-6, and 8; Reply Comments Midwest Energy, pp. 2-4; Initial Comments KCP&L, p. 24; Reply Comments of KCP&L, p. 8.

⁵⁹ Direct Testimony in Support Lutz, p. 5.

electric grid as a backup system resulting in their consuming less energy than non-DG customers, which results in DG customers not paying the same proportion of fixed costs as non-DG customers.⁶⁰ The Commission finds DG customers are thus being subsidized by non-DG customers.⁶¹

23. Third, the Commission finds the following rate design options are appropriate for residential private DG customers, to allow utilities to better recover the costs of providing service to that class or sub-class of customers:

- a. A cost of service based three-part rate consisting of a customer charge, demand charge, and energy charge;⁶²
- b. A grid charge based upon either the DG output or nameplate rating;⁶³ or
- c. A cost of service-based customer charge that is tiered based upon a customer's capacity requirements.⁶⁴

The Commission finds the above list is not meant to preclude a utility from proposing other appropriate rate designs within that individual utility's rate case proceeding, but rather recognizes that each utility might have different conditions and different needs.⁶⁵ Thus, the Commission finds the S&A allows flexibility for a variety of alternatives.⁶⁶

24. The Commission's finding that the above rate designs are appropriate does not serve as a predetermination that the above rate designs will result in just and reasonable rates.

⁶⁰ Initial Comments Staff, pp. 1-2; Initial Comments Westar Energy, pp. 7-13; Initial Comments Empire, p. 2; Initial Comments Southern Pioneer and KEC, pp. 5-7; Initial Comments Midwest Energy, ¶13; Initial Comments KCP&L, pp. 23-24; Initial Comments of Cary Catchpole for the CURB, ¶16; Initial Comments of Brian Kalcic for the CURB, ¶7.

⁶¹ Initial Comments Staff, pp. 1-4; Tr. Vol. 1, p. 112.

⁶² See Faruqui Initial Affidavit, at pp. 12-22, Brown Initial Affidavit, at pp. 41-42, Martin Initial Affidavit, at pp. 4-5, Faruqui Reply Affidavit, at pp. 1-2, Brown Reply Affidavit, at pp. 1-4, Martin Reply Affidavit, at pp. 5-6.

⁶³ Initial Comments of Southern Pioneer and KEC, p. 7; Initial Comments of Sunflower and Mid-Kansas, p. 4.

⁶⁴ Initial Comments CURB, p. 5; Initial Comments Empire, p. 3; Initial Comments Sunflower and Mid-Kansas, p. 4.

⁶⁵ Direct Testimony in Support Lutz, p. 7.

⁶⁶ Direct Testimony in Support Lutz, p. 7.

Rather, based upon the testimony on the record, the Commission interprets the S&A as requiring the sponsoring utility of a new DG rate design as having the burden to show that any proposed rate design will result in non-discriminatory, just and reasonable rates.⁶⁷

25. Fourth, the Commission finds a customer education program must be implemented whenever new residential private DG rate structures are ordered, and that program should be completed as soon as practical after the Commission approves a new rate design.⁶⁸

26. Fifth, the Commission finds rates for private residential DG customers should be cost-based and any unquantifiable value of resource approach should not be considered when setting rates. This is because cost-based rates are a fundamental attribute of good rate design as they allow the Commission to clearly identify quantifiable costs, which ensures rates for all customers are equitable while encouraging efficient use of resources and minimization of unnecessary cross-subsidization between customers.⁶⁹ This finding is consistent with the Commission's stated preference at the initiation of this investigation.⁷⁰ The Commission finds a class cost of service study provides sufficient support for design of a residential private DG tariff and no further study is necessary for the purpose of this docket because the class cost of service study takes into consideration benefits in the form of avoided costs.⁷¹ However, this finding does not preclude any party from sponsoring any study it believes necessary to provide an evidentiary basis for its position in a general rate case. As in this docket, any study submitted should include only quantifiable market-based costs and benefits to the utility.

⁶⁷ See, K.S.A. 66-101b; K.A.R. 82-1-231.

⁶⁸ Direct Testimony in Support Lutz, p. 8.

⁶⁹ Direct Testimony in Support Lutz, p. 8.

⁷⁰ Order Opening General Investigation, p. 5.

⁷¹ Initial Comments Staff, pp. 2-3

27. Sixth, the Commission finds that a value of resource study (i.e. cost-benefit analysis) is not required by the Commission at this time because, as testified by Staff, such studies have limited value because they return widely varying results and unnecessarily duplicate information already part of utility-specific class cost of service studies.⁷² However, as indicated above, nothing herein precludes any party from developing any study it believes to be helpful to the Commission in establishing just and reasonable rates.

28. Seventh, the Commission finds DG rate design policy is best determined in this docket in order to provide certainty to all parties for the benefit of the orderly development of the private DG market in Kansas.⁷³ Without a determination by this Commission as to what an appropriate DG rate structure is, future rate design proposals will be undermined by the question of whether that particular rate design proposal is appropriate.⁷⁴ However, the Commission finds electric utilities that do not currently have DG tariffs shall have the option to propose DG tariffs consistent with the principles established in this general investigation in subsequent general rate case filings for approval by the Commission.

29. Eight, the Commission finds any DG-specific rate design implemented subsequent to this proceeding to serve residential private DG customers would apply to those customers adding DG systems on or after the effective date of those tariffs. Customers with distributed DG systems implemented and operating prior to that date and served by other rate designs will be allowed to remain on those preexisting rates until January 1, 2030, to the extent permitted by Kansas law. On and after January 1, 2030, all distributed generation customers will be subject to the then current residential DG rate design. The Commission further finds this S&A

⁷² Initial Comments Staff, p. 8 (Mar. 17, 2017); Reply Comments Staff, p. 3; *See also*, Direct Testimony in Support Lutz, p. 8.

⁷³ Direct Testimony in Support Lutz, p. 9.

⁷⁴ *Id.*

term to be in the public interest because the term sets clear timeframes for implementation of any new DG structure while providing an important grandfathering period to provide a transition to the new rates, while protecting customers served under the old designs from unanticipated changes.⁷⁵ Likewise, the future closing date of January 1, 2030, is appropriate because it is the date set by statute when methods used to compensate excess generation under net meeting are unified under a single method.⁷⁶

30. Specific to Westar, the Commission finds the settlement approved by the Commission in Westar's last general rate case regarding the creation of the "Residential Standard Distributed Generation" tariff remains in effect and customers who added DG on or after October 28, 2015, will be subject to the rate design change that occurs in future rate case dockets based on the policy established in this docket. The Commission finds this approach is appropriate because Westar's customers on its Residential Standard Distribution Generation tariff have received notice in Docket No. 15-WSEE-115-RTS and through Westar's outreach efforts.⁷⁷

31. Ninth, the Commission finds this S&A provides guidance to the cooperatives that have elected to be self-regulated pursuant to K.S.A. 66-104d, but such self-regulated cooperatives shall not be bound by the S&A. The Commission finds such non-binding guidance to be in the public interest because it acknowledges that the cooperatives regulatory structure is different from the other public utilities subject to the S&A, while identifying how the S&A impacts them.⁷⁸

⁷⁵ Direct Testimony in Support Lutz, p. 10.

⁷⁶ *Id.*

⁷⁷ Tr. Vol. 1, p. 124.

⁷⁸ Direct Testimony in Support Lutz, p. 10.

Whether the stipulation and agreement conforms with applicable law?

32. Because of the rationale laid out below in paragraphs 34-37 the Commission concludes the S&A is in conformance with applicable law.

Whether the stipulation and agreement results in just and reasonable rates?

33. The Commission finds the S&A does not change rates or rate design for any customer⁷⁹ and thus the S&A results in the continuation of existing rates which the Commission has previously found to be just and reasonable.

Whether the results of the stipulation and agreement are in the public interest, including the interest of the customers represented by the party not consenting to the agreement?

34. The Commission interprets the S&A as a roadmap the electric utilities may pursue in future rate filings. The Commission interprets the S&A as establishing the following policies:

- a. utilities may determine whether a separate rate class is appropriate;⁸⁰
- b. utilities may provide cost data for that class through a class cost of service study as required by Commission regulation;⁸¹
- c. utilities are to provide cost data uniformly, excluding non-quantifiable societal benefits and externalities; and⁸²
- d. utilities may recommend the rate design appropriate for their electric system, service and customer base.⁸³

⁷⁹ Direct Testimony in Support Glass, p. 7.

⁸⁰ S&A, ¶¶ 9-10.

⁸¹ *Id.* at ¶ 13; *See also*, K.A.R. 82-1-231.

⁸² S&A, at ¶ 14.

⁸³ *Id.* at ¶ 11.

35. The Commission finds the S&A is in the public interest because it establishes a policy framework for implementing DG. This framework provides a means through which DG issues as yet undetermined can be addressed in a utility-specific rate case docket.

36. Similarly, though the record evidence supports a finding that DG customers are not paying their full fixed costs⁸⁴ and are thus being cross-subsidized by the other residential customers,⁸⁵ there is not sufficient evidence for the Commission to determine whether that cross-subsidization results in an unduly preferential rate because not all of the utilities provided analysis regarding the extent to which cross-subsidization exists.⁸⁶ The record suggests that information would only be available after the utilities completed a class cost of service study in their next rate case.

37. The Commission finds approving the S&A is in the public interest because it allows the parties to further develop the necessary facts on a utility by utility basis. Likewise, the Commission believes this course of action allows utilities to propose new DG tariffs consistent with terms of the S&A and for the Commission to address each proposal individually. The Commission finds the S&A allows the Commission to do so without negatively impacting any of the parties. The rights and obligations of the parties are the same following this order as they were at the beginning of this docket. Therefore, the Commission finds no party is negatively impacted by the S&A because it merely shifts the discussion and production of evidence into utility specific dockets, where the burden of proof remains on the utilities to show that their proposed rate design results in non-discriminatory and just and reasonable rates. Therefore, the Commission finds the S&A is in the public interest.

⁸⁴ Initial Comments Staff, p. 1.

⁸⁵ Initial Comments Staff, pp. 1, 4; Tr. Vol. 1, p. 112.

⁸⁶ Tr. Vol. 1 pp. 113-120; p.130; pp. 298-299.

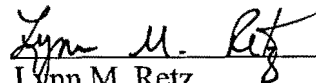
THEREFORE, THE COMMISSION ORDERS:

- A. The Non-Unanimous Stipulation and Agreement is approved.
- B. The parties have 15 days from the date this Order was electronically served to petition for reconsideration.⁸⁷
- C. The Commission retains jurisdiction over the subject matter and parties for the purpose of entering such further orders as it deems necessary.

BY THE COMMISSION IT IS SO ORDERED.

Apple, Chairman; Albrecht, Commissioner; Emler, Commissioner

Dated: SEP 21 2017



Lynn M. Retz
Secretary to the Commission

SF

EMAILED

SEP 21 2017

⁸⁷ K.S.A. 66-118b; K.S.A. 77-529(a)(1).

CERTIFICATE OF SERVICE

16-GIME-403-GIE

I, the undersigned, certify that the true copy of the attached Order has been served to the following parties by means of

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CERTIFICATE OF SERVICE

16-GIME-403-GIE

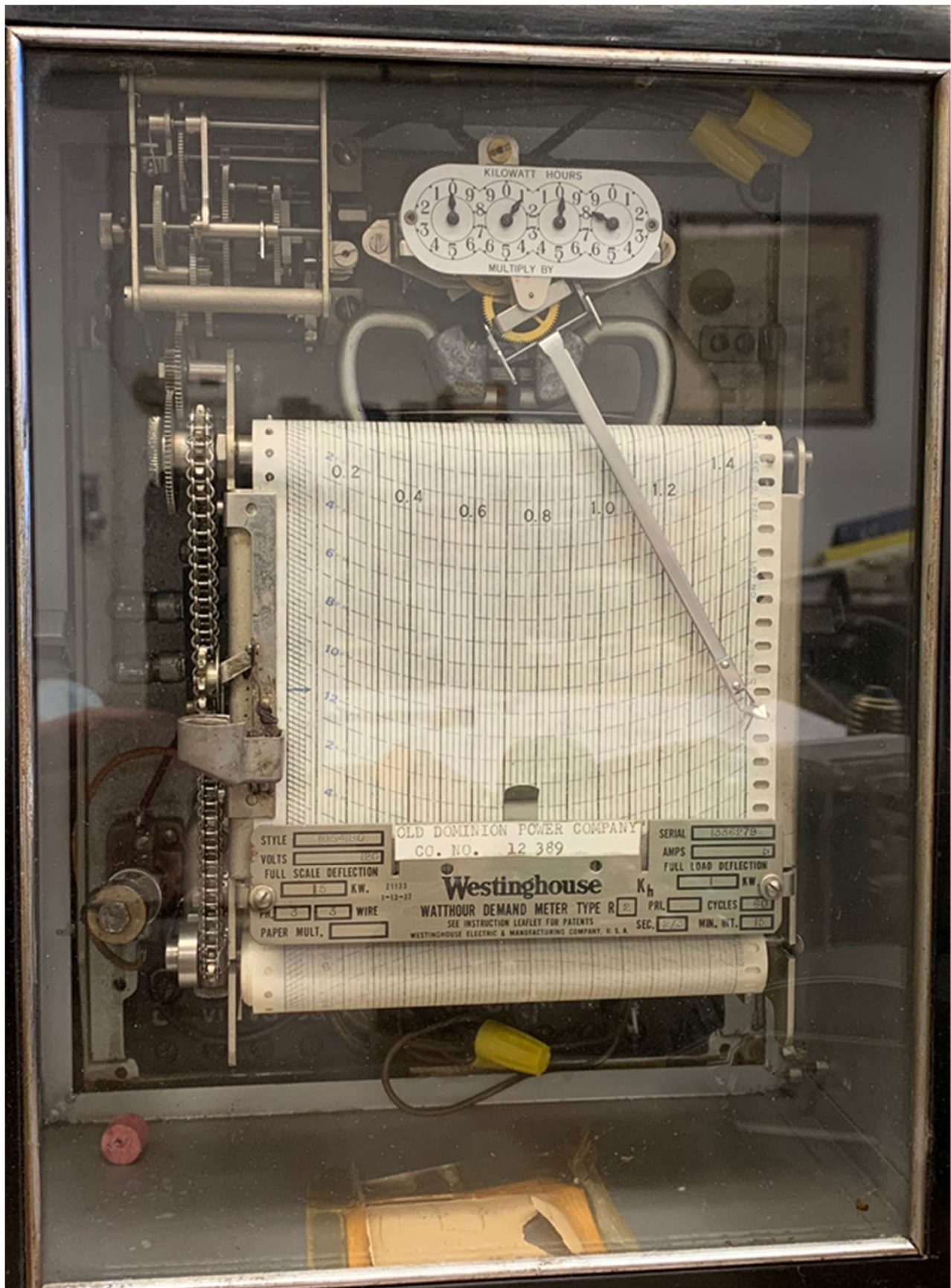
/s/ DeeAnn Shupe
DeeAnn Shupe

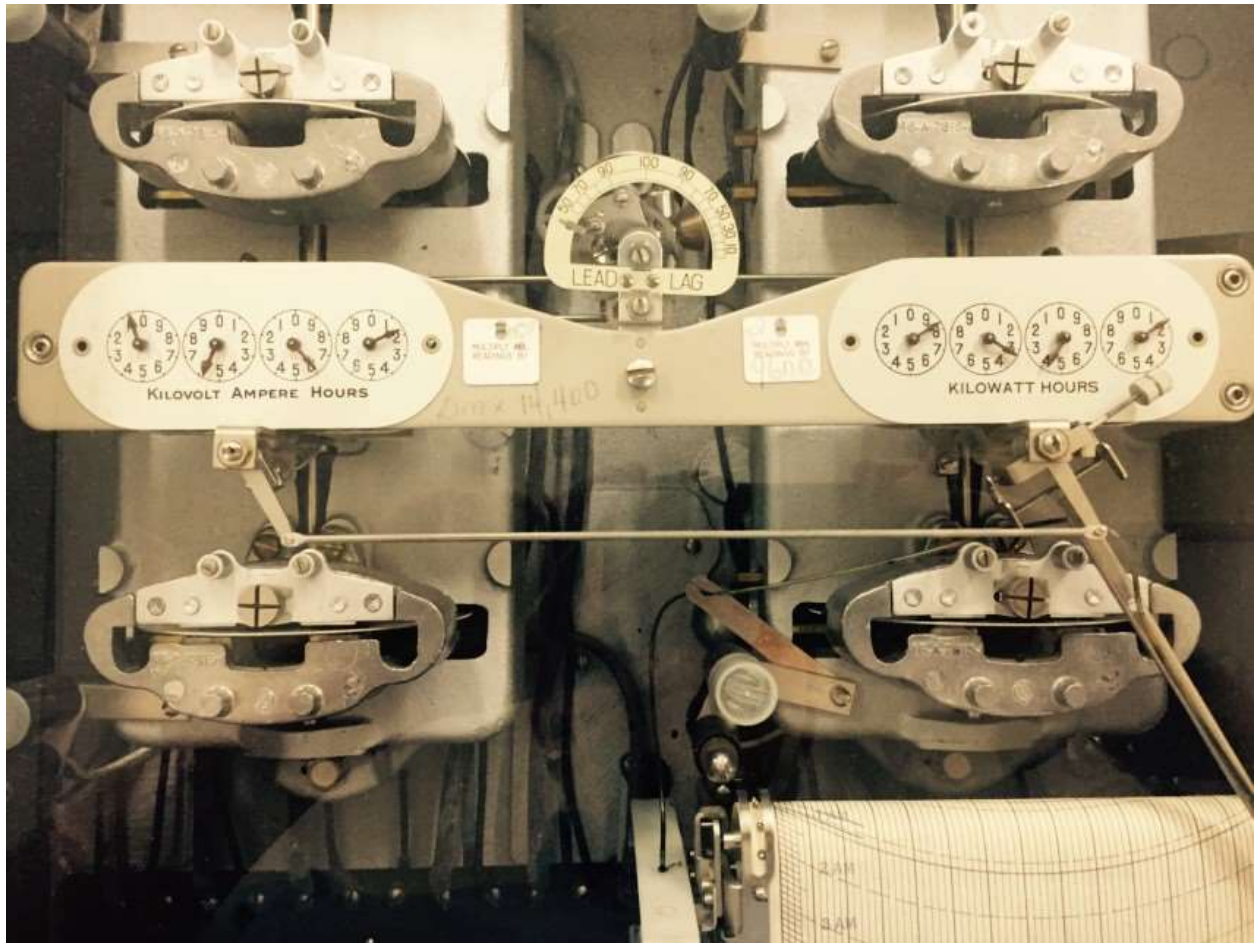
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SEP 21 2017

Exhibit WSS-8

Traditional Metering Equipment Required for Four-Part Rates







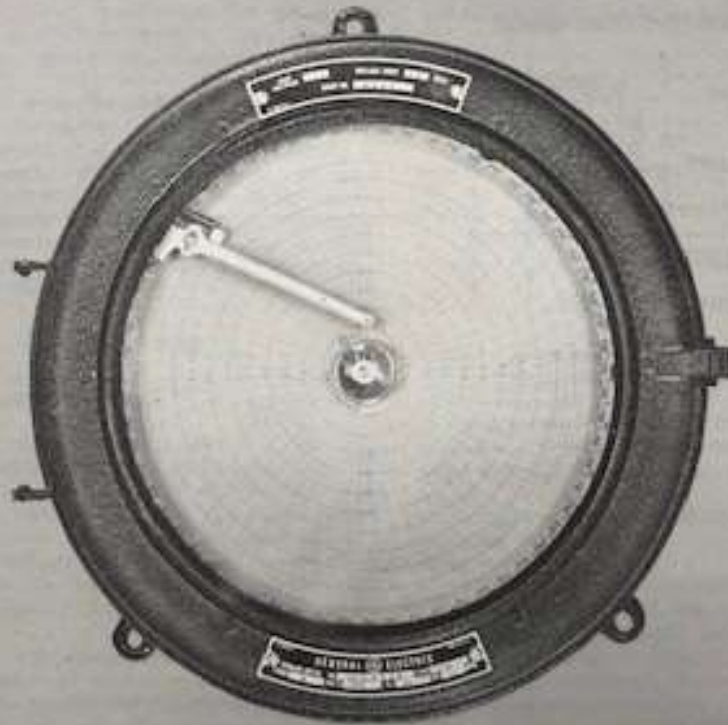
INSTRUCTIONS

Supersedes Form 9-73

DEMAND METERS

TYPES G-9, GS-9, AND GS-12

New 9-73

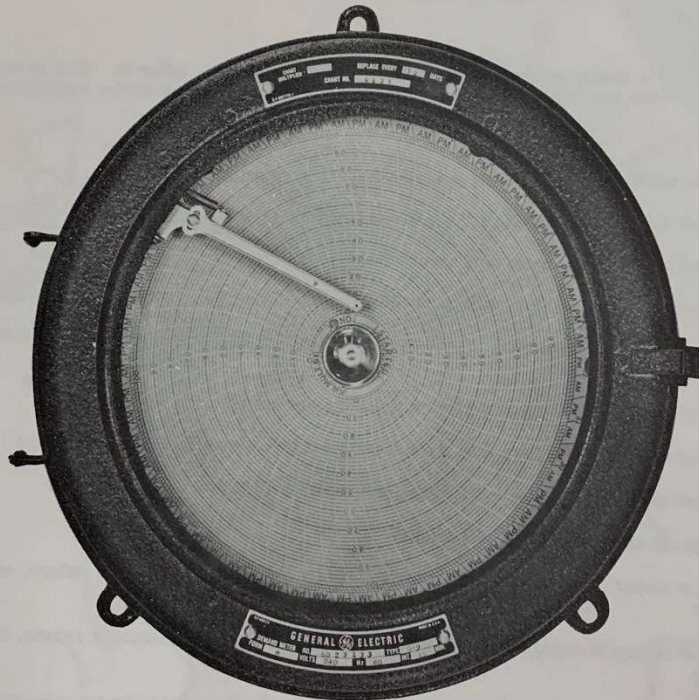


GENERAL  ELECTRIC



RENEWAL PARTS

TYPES G-9, GS-9 AND GS-12 DEMAND METERS



When ordering renewal parts, give quantity, catalog number, description of each item required, and complete nameplate reading.

GENERAL  ELECTRIC

Exhibit WSS-9

Electric Vehicle Ownership by State in U.S.

| Electric Vehicle Registrations in 2018 | | | | |
|--|------------------|------------|--------------------------|-------------------------------------|
| State | EV Registrations | Population | Per Capita Registrations | Registrations per 100,000 Residents |
| California | 256,800 | 39,557,045 | 0.0065 | 649.19 |
| Hawaii | 6,590 | 1,420,491 | 0.0046 | 463.92 |
| Washington | 28,400 | 7,535,591 | 0.0038 | 376.88 |
| Oregon | 12,400 | 4,190,713 | 0.0030 | 295.89 |
| Arizona | 15,000 | 7,171,646 | 0.0021 | 209.16 |
| Colorado | 11,700 | 5,695,564 | 0.0021 | 205.42 |
| Vermont | 1,060 | 626,299 | 0.0017 | 169.25 |
| Utah | 5,220 | 3,161,105 | 0.0017 | 165.13 |
| Nevada | 4,810 | 3,034,392 | 0.0016 | 158.52 |
| Georgia | 15,300 | 10,519,475 | 0.0015 | 145.44 |
| Massachusetts | 9,760 | 6,902,149 | 0.0014 | 141.41 |
| District Of Columbia | 970 | 702,455 | 0.0014 | 138.09 |
| New Jersey | 12,100 | 8,908,520 | 0.0014 | 135.83 |
| Maryland | 8,080 | 6,042,718 | 0.0013 | 133.71 |
| Connecticut | 4,450 | 3,572,665 | 0.0012 | 124.56 |
| Florida | 25,200 | 21,299,325 | 0.0012 | 118.31 |
| Virginia | 8,370 | 8,517,685 | 0.0010 | 98.27 |
| Illinois | 12,400 | 12,741,080 | 0.0010 | 97.32 |
| New York | 16,600 | 19,542,209 | 0.0008 | 84.94 |
| Minnesota | 4,740 | 5,611,179 | 0.0008 | 84.47 |
| Oklahoma | 3,290 | 3,943,079 | 0.0008 | 83.44 |
| New Hampshire | 1,120 | 1,356,458 | 0.0008 | 82.57 |
| Texas | 22,600 | 28,701,845 | 0.0008 | 78.74 |
| Delaware | 720 | 967,171 | 0.0007 | 74.44 |
| Alaska | 530 | 737,438 | 0.0007 | 71.87 |
| North Carolina | 7,320 | 10,383,620 | 0.0007 | 70.50 |
| Wisconsin | 3,680 | 5,813,568 | 0.0006 | 63.30 |
| Pennsylvania | 7,990 | 12,807,060 | 0.0006 | 62.39 |
| Idaho | 1,080 | 1,754,208 | 0.0006 | 61.57 |
| New Mexico | 1,260 | 2,095,428 | 0.0006 | 60.13 |
| Tennessee | 3,980 | 6,770,010 | 0.0006 | 58.79 |
| Rhode Island | 600 | 1,057,315 | 0.0006 | 56.75 |
| Missouri | 3,450 | 6,126,452 | 0.0006 | 56.31 |
| Maine | 750 | 1,338,404 | 0.0006 | 56.04 |
| Ohio | 6,510 | 11,689,442 | 0.0006 | 55.69 |
| Kansas | 1,610 | 2,911,505 | 0.0006 | 55.30 |
| Montana | 500 | 1,062,305 | 0.0005 | 47.07 |
| Indiana | 3,030 | 6,691,878 | 0.0005 | 45.28 |
| Nebraska | 850 | 1,929,268 | 0.0004 | 44.06 |
| Michigan | 4,210 | 9,995,915 | 0.0004 | 42.12 |
| South Carolina | 1,950 | 5,084,127 | 0.0004 | 38.35 |
| Iowa | 1,090 | 3,156,145 | 0.0003 | 34.54 |
| Alabama | 1,450 | 4,887,871 | 0.0003 | 29.67 |
| South Dakota | 260 | 882,235 | 0.0003 | 29.47 |
| Wyoming | 170 | 577,737 | 0.0003 | 29.43 |
| Kentucky | 1,240 | 4,468,402 | 0.0003 | 27.75 |
| Louisiana | 1,110 | 4,659,978 | 0.0002 | 23.82 |
| North Dakota | 170 | 760,077 | 0.0002 | 22.37 |
| Arkansas | 520 | 3,013,825 | 0.0002 | 17.25 |
| Mississippi | 390 | 2,986,530 | 0.0001 | 13.06 |
| West Virginia | 230 | 1,805,832 | 0.0001 | 12.74 |

Sources: Electric Vehicle Registrations were obtained from a US Department of Energy
<https://afdc.energy.gov/data/10962>
2018 Population
<https://www.census.gov/newsroom/press-kits/2018/pop-estimates-national-state.html>

Electric Vehicle Registrations by State

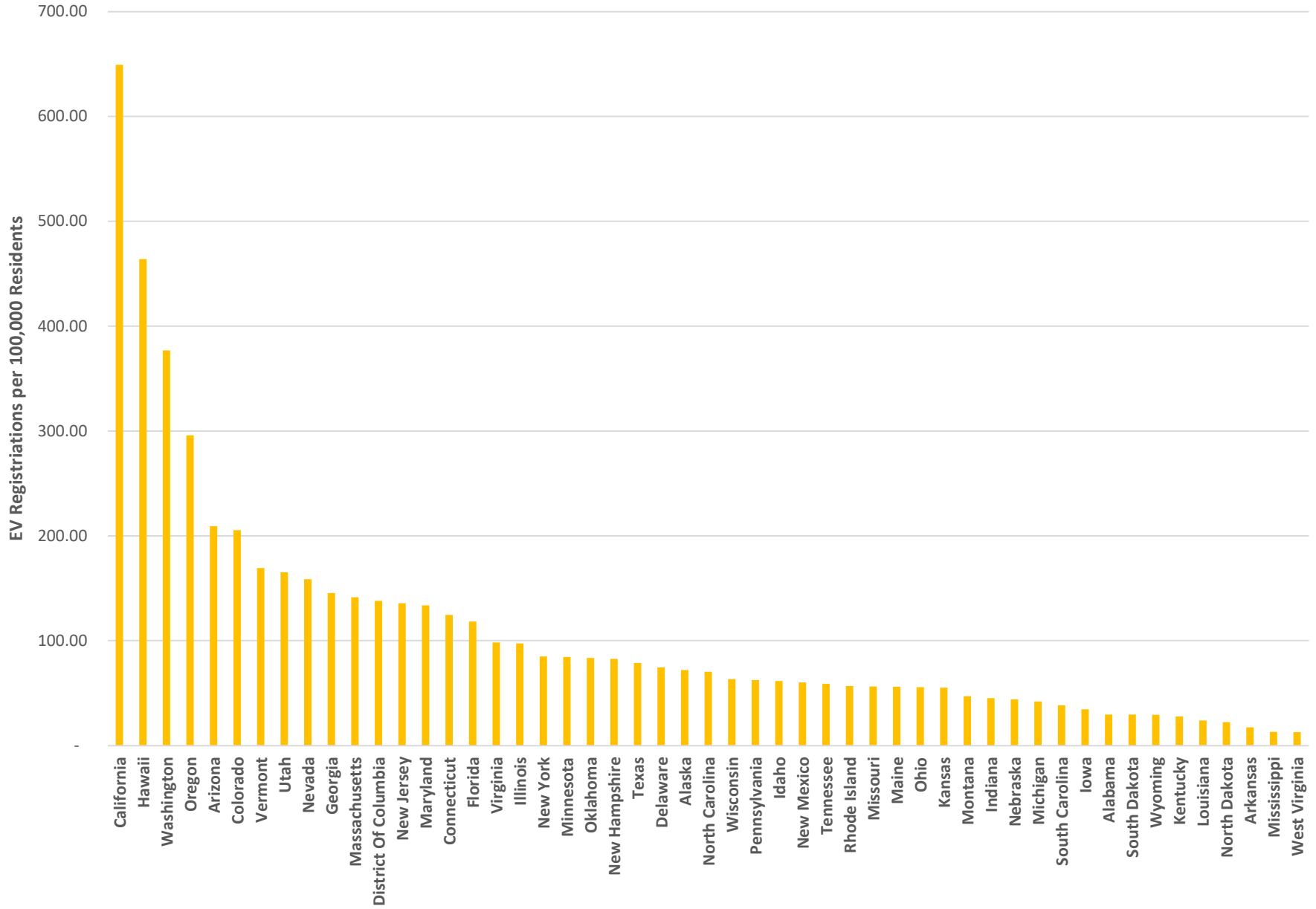


Exhibit WSS-10

DC Fast Charging Ports

Versus

Electric Vehicles by State in U.S.

| Relationship Between Electric Vehicles and DC Fast Charging Stations | | |
|--|------------------------|---------------------------|
| State | DC Fast Charging Ports | Plug-in Electric Vehicles |
| Alabama | 78 | 1,450 |
| Alaska | 4 | 530 |
| Arizona | 363 | 15,000 |
| Arkansas | 44 | 520 |
| California | 4,679 | 256,800 |
| Colorado | 339 | 11,700 |
| Connecticut | 223 | 4,450 |
| Delaware | 65 | 720 |
| District of Columbia | 20 | 970 |
| Florida | 760 | 25,200 |
| Georgia | 420 | 15,300 |
| Hawaii | 90 | 6,590 |
| Idaho | 75 | 1,080 |
| Illinois | 337 | 12,400 |
| Indiana | 171 | 3,030 |
| Iowa | 134 | 1,090 |
| Kansas | 121 | 1,610 |
| Kentucky | 68 | 1,240 |
| Louisiana | 68 | 1,110 |
| Maine | 126 | 750 |
| Maryland | 424 | 8,080 |
| Massachusetts | 329 | 9,760 |
| Michigan | 280 | 4,210 |
| Minnesota | 187 | 4,740 |
| Mississippi | 56 | 390 |
| Missouri | 196 | 3,450 |
| Montana | 96 | 500 |
| Nebraska | 64 | 850 |
| Nevada | 266 | 4,810 |
| New Hampshire | 69 | 1,120 |
| New Jersey | 407 | 12,100 |
| New Mexico | 108 | 1,260 |
| New York | 579 | 16,600 |
| North Carolina | 297 | 7,320 |
| North Dakota | 34 | 170 |
| Ohio | 350 | 6,510 |
| Oklahoma | 328 | 3,290 |
| Oregon | 361 | 12,400 |
| Pennsylvania | 289 | 7,990 |
| Rhode Island | 38 | 600 |
| South Carolina | 100 | 1,950 |
| South Dakota | 54 | 260 |
| Tennessee | 171 | 3,980 |
| Texas | 693 | 22,600 |
| Utah | 186 | 5,220 |
| Vermont | 54 | 1,060 |
| Virginia | 457 | 8,370 |
| Washington | 566 | 28,400 |
| West Virginia | 60 | 230 |
| Wisconsin | 144 | 3,680 |
| Wyoming | 75 | 170 |
| Total | 15,503 | 543,610 |
| Correlation Coefficient | | 0.9867 |

Source: US Department of Energy, "Alternative Fueling Station Counts by State", August 31, 2020

Relationship of Electric Vehicles to DC Fast Charging Outlets

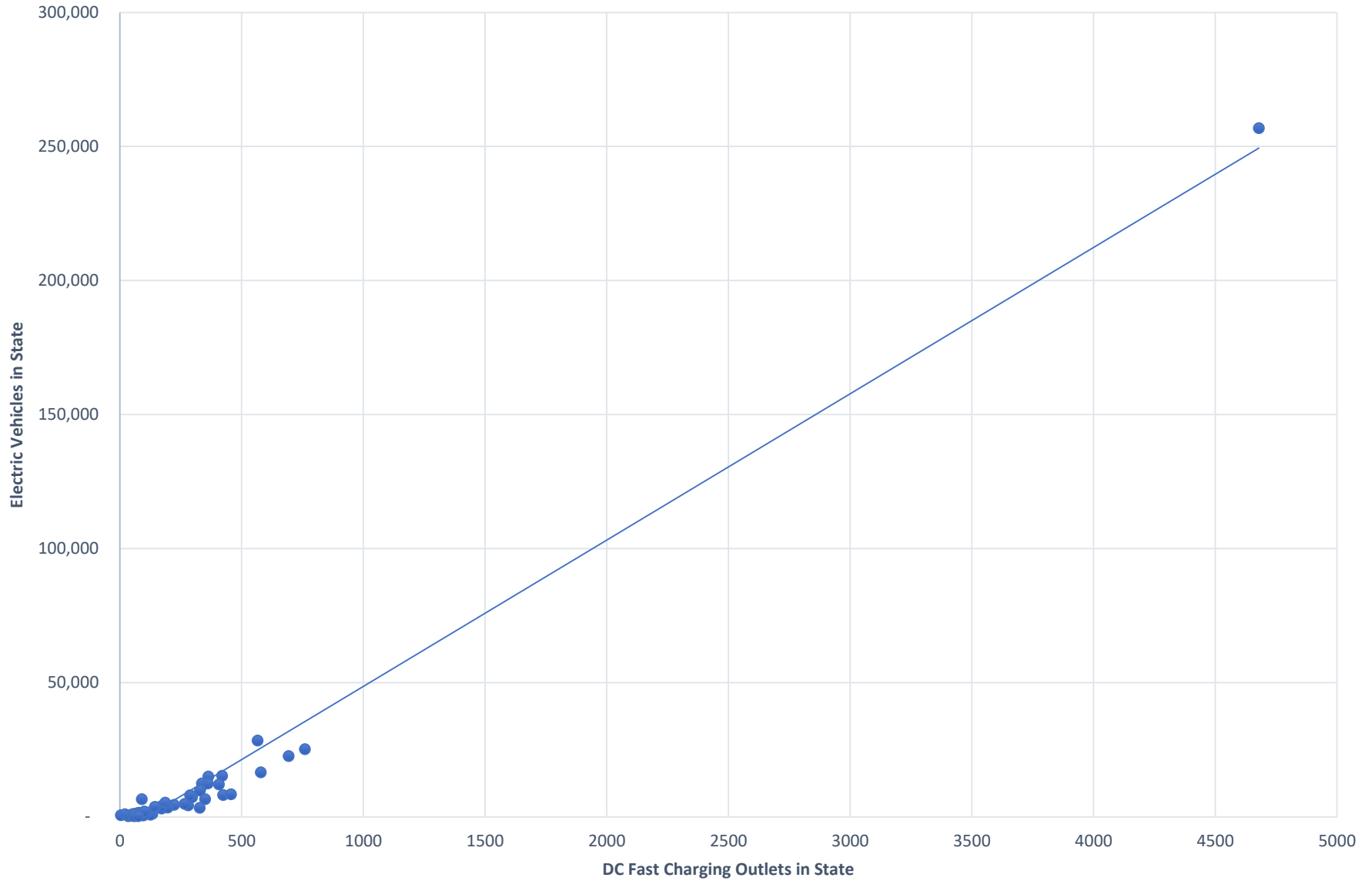


Exhibit WSS-11

Cost Support for Electric Vehicle
Supply Equipment Rate and Rider

**Kentucky Utilities Company
Derivation of Rates**

Clipper Creek - Single

| | | | |
|--|------------|----|--------------|
| Estimated Investment per Unit | | \$ | 800.85 |
| Fixed Charges @ | 20.51% | \$ | 244.30 |
| O&M (Scheduled/Trouble) | | \$ | 126.00 |
| Chargepoint Annual Cost | | \$ | - |
| | | \$ | 370.30 |
| Monthly Rate for Equipment Only | | \$ | 30.86 |
| EVC Rate per Hour for Equipment Only | | | - |
| Distribution Energy per kWh per year (Calculated with GS Rate) | \$ 0.12469 | \$ | 623.99 |
| Distribution Energy per kWh per month | | \$ | 52.00 |
| Distribution Energy per kWh per hour | | | - |
| Basic Service Charge | | \$ | - |
| Fuel Adjustment Clause | | \$ | - |
| Solar PPA Adjustment Clause | | \$ | - |
| Economic Recovery Surcredit | | \$ | - |
| Environmental Surcharge (Level 2) | | \$ | - |
| Franchise Fee | | \$ | - |
| School Tax | | \$ | - |
| State Sales Tax | | \$ | - |
| EVSE Monthly Rate for Equipment, Energy & Factors | | \$ | 82.86 |
| EVC Fee per Hour for Equipment, Energy & Factors | | | |
| EVSE-R Monthly Rate for Equipment Only | | \$ | 30.86 |

EVSE - Company will furnish, own, install, and maintain the charging unit and cable. Customer will furnish, own, and install all duct systems and associated equipment. Customer shall be responsible for the charging equipment installation costs.

EVSE-R - Customer installs and owns facilities on its side of the meter to serve Company-provided charging station.

**Louisville Gas and Electric Company
Derivation of Rates**

Clipper Creek - Single

| | | | |
|--|------------|----|--------------|
| Estimated Investment per Unit | | \$ | 800.85 |
| Fixed Charges @ | 20.70% | \$ | 245.89 |
| O&M (Scheduled/Trouble) | | \$ | 126.00 |
| Chargepoint Annual Cost | | \$ | - |
| | | \$ | 371.89 |
| Monthly Rate for Equipment Only | | \$ | 30.99 |
| EVC Rate per Hour for Equipment Only | | | - |
| Distribution Energy per kWh per year (Calculated with GS Rate) | \$ 0.12355 | \$ | 618.29 |
| Distribution Energy per kWh per month | | \$ | 51.52 |
| Distribution Energy per kWh per hour | | | - |
| Basic Service Charge | | \$ | - |
| Fuel Adjustment Clause | | \$ | - |
| Solar PPA Adjustment Clause | | \$ | - |
| Economic Recovery Surcredit | | \$ | - |
| Environmental Surcharge (Level 2) | | \$ | - |
| Franchise Fee | | \$ | - |
| School Tax | | \$ | - |
| State Sales Tax | | \$ | - |
| EVSE Monthly Rate for Equipment, Energy & Factors | | \$ | 82.51 |
| EVC Fee per Hour for Equipment, Energy & Factors | | | |
| EVSE-R Monthly Rate for Equipment Only | | \$ | 30.99 |

EVSE - Company will furnish, own, install, and maintain the charging unit and cable. Customer will furnish, own, and install all duct systems and associated equipment. Customer shall be responsible for the charging equipment installation costs.

EVSE-R - Customer installs and owns facilities on its side of the meter to serve Company-provided charging station.

Exhibit WSS-12

Cost Support for
Redundant Capacity Charge

Kentucky Utilities Company

Derivation of Distribution Demand-Related Cost for
Redundant Capacity

Based on the 12 Months Ended June 30, 2022

Secondary Service

Distribution Demand Costs

| | | |
|------------|----|------------------|
| PSS | \$ | 4,721,893 |
| TODS | \$ | 4,144,728 |
| Total Cost | \$ | <u>8,866,621</u> |

Billing Demand

| | | |
|------------|--|-------------------|
| PSS | | 5,272,876 |
| TODS | | 6,217,430 |
| Total Cost | | <u>11,490,306</u> |

Unit Cost \$ 0.77

Rate Base

| | | |
|------------|----|-------------------|
| PSS | \$ | 49,645,807 |
| TODS | \$ | 43,613,366 |
| Total Cost | \$ | <u>93,259,173</u> |

Return \$ 6,770,616

Unit Return \$ 0.59

Capacity Charge \$ 1.36 / KW

Kentucky Utilities Company

Derivation of Distribution Demand-Related Cost for
Redundant Capacity

Based on the 12 Months Ended June 30, 2022

Primary Service

Distribution Demand Costs

| | | |
|------------|----|------------------|
| PSP | \$ | 172,706 |
| TODP | \$ | <u>5,548,170</u> |
| Total Cost | \$ | 5,720,876 |

Billing Demand

| | | |
|------------|--|-------------------|
| PSP | | 301,512 |
| TODP | | <u>10,620,000</u> |
| Total Cost | | 10,921,512 |

Unit Cost \$ 0.52

Rate Base

| | | |
|------------|----|-------------------|
| PSP | \$ | 1,711,384 |
| TODP | \$ | <u>57,382,076</u> |
| Total Cost | \$ | 59,093,460 |

Return \$ 4,290,185

Unit Return \$ 0.39

Capacity Charge \$ 0.92 / KW

Louisville Gas and Electric Company

Derivation of Distribution Demand-Related Cost for
Redundant Capacity

Based on the 12 Months Ended June 30, 2022

Secondary Service

Distribution Demand Costs

| | | |
|------------|----|-------------------|
| PSS | \$ | 5,691,826 |
| TODS | | <u>4,551,553</u> |
| Total Cost | \$ | <u>10,243,379</u> |

Billing Demand

| | | |
|------------|--|------------------|
| PSS | | 4,277,098 |
| TODS | | <u>4,406,484</u> |
| Total Cost | | <u>8,683,582</u> |

Unit Cost \$ 1.18

Rate Base

| | | |
|------------|----|-------------------|
| PSS | \$ | 50,667,367 |
| TODS | | <u>40,506,142</u> |
| Total Cost | \$ | <u>91,173,509</u> |

Return \$ 6,546,258

Unit Return \$ 0.75

Capacity Charge \$ 1.93 / KW

Louisville Gas and Electric Company

Derivation of Distribution Demand-Related Cost for
Redundant Capacity

Based on the 12 Months Ended June 30, 2022

Primary Service

Distribution Demand Costs

| | | |
|------------|----|------------------|
| PSP | \$ | 304,138 |
| TODP | | 4,297,652 |
| Total Cost | \$ | <u>4,601,791</u> |

Billing Demand

| | | |
|------------|--|------------------|
| PSP | | 340,066 |
| TODP | | 5,354,606 |
| Total Cost | | <u>5,694,672</u> |

Unit Cost \$ 0.81

Rate Base

| | | |
|------------|----|-------------------|
| PSP | \$ | 2,580,628 |
| TODP | | 36,684,134 |
| Total Cost | \$ | <u>39,264,762</u> |

Return \$ 2,819,210

Unit Return \$ 0.50

Capacity Charge \$ 1.31 / KW

Exhibit WSS-13

Summary of Class Rates of Returns for Gas Operations

Louisville Gas and Electric Company
Summary of Adjusted Rates of Return by Class

| Rate Class | Revenue | Operating Expenses | Operating Margin | Rate Base | Rate of Return On Rate Base | Rate of Return On Rate Base After Increase |
|--|-----------------------|-----------------------|----------------------|-------------------------|-----------------------------|--|
| Residential Service Rate RGS | \$ 160,544,346 | \$ 126,307,888 | \$ 34,236,458 | \$ 741,469,107 | 4.62% | 6.87% |
| Commercial Service Rate CGS | 60,474,931 | 42,069,078 | 18,405,853 | 243,310,119 | 7.56% | 9.08% |
| Industrial Service Rate IGS | 4,718,125 | 2,739,722 | 1,978,403 | 14,445,380 | 13.70% | 13.69% |
| As Available Gas Service Rate AAGS | 224,602 | 287,484 | (62,883) | 1,942,049 | -3.24% | 0.98% |
| Firm Transportation Service Rate FT | 6,589,010 | 7,483,056 | (894,046) | 51,183,321 | -1.75% | 2.10% |
| | \$ 232,551,013 | \$ 178,887,228 | \$ 53,663,785 | \$ 1,052,349,977 | 5.10% | 7.23% |

Exhibit WSS-14

Analysis of Subsidy Reduction for Gas Operations

Louisville Gas and Electric Company
 25% Subsidy Reduction for Gas Operations

25% Subsidy Reduction RGS, AAGS, FT

| | Total System | Residential (RGS) | Commercial (CGS) | Industrial (IGS) | As Available Gas Service (AAGS) | Firm Transportation Service (FT) |
|---|---------------------|--------------------------|-------------------------|-------------------------|--|---|
| Test Year Operating Income | \$ 53,663,785 | \$ 34,236,458 | \$ 18,405,853 | \$ 1,978,403 | \$ (62,883) | \$ (894,046) |
| Proposed Increase | \$ 29,977,693 | \$ 22,317,229 | \$ 4,920,979 | \$ - | \$ 109,476 | \$ 2,630,008 |
| Adjustment to Forefeited Discounts | | | | | | |
| Adjustment to Returned Check Fees | | | | | | |
| Incremental Income Taxes | 24.85% \$ 7,449,292 | \$ 5,545,709 | \$ 1,222,836 | \$ - | \$ 27,204 | \$ 653,543 |
| Incremental Uncollectable Accounts Expense | 0.203% \$ 60,855 | \$ 45,304 | \$ 9,990 | \$ - | \$ 222 | \$ 5,339 |
| Incremental Commission Fees | 0.20% \$ 59,955 | \$ 44,634 | \$ 9,842 | \$ - | \$ 219 | \$ 5,260 |
| | 25.25% | | | | | |
| Net Operating Income Adjusted for Increase | \$ 76,071,376 | \$ 50,918,040 | \$ 22,084,164 | \$ 1,978,403 | \$ 18,948 | \$ 1,071,821 |
| Net Cost Rate Base (Same as Above) | \$ 1,052,349,977 | \$ 741,469,107 | \$ 243,310,119 | \$ 14,445,380 | \$ 1,942,049 | \$ 51,183,321 |
| Rate of Return -- Proposed | 7.23% | 6.87% | 9.08% | 13.70% | 0.98% | 2.09% |
| Equalized ROR | \$ 76,071,376 | \$ 53,598,685 | \$ 17,588,194 | \$ 1,044,215 | \$ 140,385 | \$ 3,699,896 |
| Proposed Subsidy Reduction in Revenue | \$ - | \$ (2,680,645) | \$ 4,495,970 | \$ 934,187 | \$ (121,437) | \$ (2,628,075) |

Exhibit WSS-15

Cost Components for Residential Gas Service Rate RGS

Louisville Gas and Electric Company
Unit Cost of Service Based on the Cost of Service Study
For the 12 Months Ended June 30, 2022

Rate RGS

| Description | Customer Costs | | | | Storage/Transmission Demand-Related Costs | Storage Compressor Costs | Other Procurement Costs | Demand Related Low Pressure Mains Costs | Transmission and Demand Related High Pressure Mains Costs | Total Costs |
|--|---|---|----------------------------------|------------------------------------|---|--------------------------------|-------------------------------|---|--|----------------|
| | Customer-Related Low Pressure Mains Costs | Customer-Related High Pressure Main Costs | Customer-Related Direct Costs | Total Customer-Related Costs | | | | | | |
| (1) Rate Base | \$ 172,050,186 | \$ 13,098,613 | \$ 240,278,815 | \$ 425,427,614 | \$ 138,972,330 | \$ 1,711,821 | \$ 498,480 | \$ 44,788,728 | \$ 130,070,134 | \$ 741,469,107 |
| (2) Rate Base Adjustments | - | - | - | - | - | - | - | - | - | - |
| (3) Rate Base as Adjusted [(1) + (2)] | \$ 172,050,186 | \$ 13,098,613 | \$ 240,278,815 | \$ 425,427,614 | \$ 138,972,330 | \$ 1,711,821 | \$ 498,480 | \$ 44,788,728 | \$ 130,070,134 | \$ 741,469,107 |
| (4) Rate of Return | 6.87% | 6.87% | 6.87% | 6.87% | 6.87% | 6.87% | 6.87% | 6.87% | 6.87% | 6.87% |
| (5) Return [(3) x (4)] | \$ 11,816,427 | \$ 899,614 | \$ 16,502,377 | \$ 29,218,418 | \$ 9,544,636 | \$ 117,568 | \$ 34,236 | \$ 3,076,095 | \$ 8,933,232 | \$ 50,924,184 |
| (6) Interest Expenses | \$ 3,318,295 | \$ 236,757 | \$ 4,455,708 | \$ 8,010,760 | \$ 1,911,258 | \$ - | \$ - | \$ 1,042,152 | \$ 1,771,296 | \$ 12,735,466 |
| (7) Net Income [(5) - (6)] | \$ 8,498,131 | \$ 662,858 | \$ 12,046,669 | \$ 21,207,658 | \$ 7,633,378 | \$ 117,568 | \$ 34,236 | \$ 2,033,943 | \$ 7,161,936 | \$ 38,188,718 |
| (8) Income Taxes | \$ 2,460,048 | \$ 191,885 | \$ 3,487,282 | \$ 6,139,215 | \$ 2,209,718 | \$ 34,034 | \$ 9,911 | \$ 588,788 | \$ 2,073,245 | \$ 11,054,910 |
| (9) Operation and Maintenance Expenses | \$ 16,176,129 | \$ 1,154,148 | \$ 27,229,324 | \$ 44,559,601 | \$ 5,599,363 | \$ 6,261,343 | \$ 1,823,293 | \$ 5,080,317 | \$ 13,078,613 | \$ 76,402,530 |
| (10) Depreciation Expenses | 6,674,526 | 476,220 | 15,912,498 | 23,063,244 | 4,780,881 | - | - | 2,096,219 | 4,046,968 | 33,987,312 |
| (11) Other Taxes | 2,712,724 | 193,550 | 3,642,564 | 6,548,838 | 1,562,463 | - | - | 851,965 | 1,448,044 | 10,411,309 |
| (12) Other Expenses | (110) | (8) | (152) | (270) | (60) | - | - | (34) | (57) | (421) |
| (13) Expense Adjustments (Non-Income Tax) | 19,049 | 1,359 | 32,065 | 52,473 | 6,594 | 7,373 | 2,147 | 5,983 | 15,401 | 89,972 |
| (14) Total Cost of Service [(4)+(8)+(9)+(10)+(11)+(12)+(13)] | \$ 39,858,793 | \$ 2,916,768 | \$ 66,805,958 | \$ 109,581,519 | \$ 23,703,594 | \$ 6,420,318 | \$ 1,869,587 | \$ 11,699,332 | \$ 29,595,445 | \$ 182,869,795 |
| (15) Less: Misc Revenue | 541,408 | 39,619 | 907,436 | 1,488,463 | 321,970 | 87,208 | 25,395 | 158,914 | 402,000 | \$ 2,483,950 |
| (16) Net Cost of Service [(13) - (14)] | \$ 39,317,385 | \$ 2,877,149 | \$ 65,898,522 | \$ 108,093,056 | \$ 23,381,624 | \$ 6,333,110 | \$ 1,844,192 | \$ 11,540,418 | \$ 29,193,446 | \$ 180,385,845 |
| (17) Billing Units | 110,180,767 | 110,180,767 | 110,180,767 | 110,180,767 | 7,724,367 | 19,501,502 | 19,501,502 | 322,467 | 322,467 | |
| (18) Unit Costs [(15) / (16)] | \$0.36/Cust/Day | \$0.03/Cust/Day | \$0.60/Cust/Day | \$0.98/Cust/Day | \$3.0270/Mcf | \$0.3247/Mcf | \$0.0946/Mcf | \$35.7879/Mcf | \$90.5317/Mcf | |

Exhibit WSS-16

Cost Support for
Pole Attachment Charge

Kentucky Utilities Company and Louisville Gas & Electric Company

Cost Support for Attachment Charges for Wireline Pole Attachments

Based on 12 Months Ended June 30, 2022

| Pole Description | 35' | 40' | 45' | Total |
|---|-----------------|-----------------|-----------------|------------------|
| Gross Plant | \$ 42,672,814 | \$ 159,603,939 | \$ 145,470,993 | \$ 347,747,746 |
| Remove Appurtenances | 15% | 15% | 15% | |
| Gross Plant less Appurtenances | \$ 36,271,892 | \$ 135,663,348 | \$ 123,650,344 | \$ 295,585,584 |
| Accumulated Depreciation | (15,423,131) | (57,685,262) | (52,577,225) | (125,685,618) |
| Remove Appurtenances | 15% | 15% | 15% | |
| Accumulated Depreciation less Appurtenances | \$ (13,109,661) | \$ (49,032,472) | \$ (44,690,642) | \$ (106,832,775) |
| Net Plant | \$ 23,162,231 | \$ 86,630,876 | \$ 78,959,702 | \$ 188,752,809 |
| Accumulated Deferred Income Taxes | \$ (5,716,450) | \$ (21,380,544) | \$ (19,487,294) | \$ (46,584,288) |
| Cash Working Capital | 269,597 | 1,008,340 | 919,052 | 2,196,989 |
| Common Plant | 773,795 | 2,894,131 | 2,637,856 | 6,305,782 |
| Net Cost Rate Base | \$ 18,489,172 | \$ 69,152,804 | \$ 63,029,316 | \$ 150,671,292 |
| Rate of Return | 7.16% | 7.16% | 7.16% | |
| Return | \$ 1,324,579 | \$ 4,954,161 | \$ 4,515,469 | \$ 10,794,208 |
| Income Taxes | 24.95% | | | |
| | \$ 326,632 | \$ 1,221,662 | \$ 1,113,484 | \$ 2,661,779 |
| Property Taxes | \$ 398,917 | \$ 1,492,021 | \$ 1,359,902 | \$ 3,250,839 |
| Depreciation Expenses | \$ 714,291 | \$ 2,671,575 | \$ 2,435,007 | \$ 5,820,873 |
| Maintenance of Poles | \$ 473,838 | \$ 1,772,238 | \$ 1,615,306 | \$ 3,861,382 |
| Tree Trimming of Poles | 1,503,856 | 5,624,689 | 5,126,622 | 12,255,167 |
| A&G Expense Allocation to Poles | 240,950 | 901,195 | 821,394 | 1,963,538 |
| Revenue Requirement | \$ 4,983,062 | \$ 18,637,541 | \$ 16,987,185 | \$ 40,607,787 |
| Quantity | 104,622 | 195,898 | 92,631 | 393,151 |
| Average Installed Cost | \$ 47.63 | \$ 95.14 | \$ 183.39 | \$ 103.29 |
| (1) Amount of Usable Space Occupied (in feet) | 1.00 | 1.00 | 1.00 | 1.00 |
| (2) Total Usable Space (per Order 251) | 13.17 | 13.17 | 13.17 | 13.17 |
| Space Usage Factor ((1) / (2)) | 0.0759 | 0.0759 | 0.0759 | 0.0759 |
| Pole Attachment Rate | \$ 3.62 | \$ 7.22 | \$ 13.92 | \$ 7.84 |

Exhibit WSS-17

Cost Support for
Excess Facilities Rider

Kentucky Utilities
Excess Facilities Charges

| | Assuming Customer Does Not Make Contribution In Aid of Construction | Assuming Customer Makes Contribution In Aid of Construction |
|---|--|---|
| 1 Present Value of Replacement Plant as a Percentage of Original Cost | 21.77 | 21.77 |
| 2 Original Cost Value | 100 | - |
| 3 Total Present Value of Original and Replacement Cost Value as a Percentage of Original Cost | 121.77 | 21.77 |
| 4 Monthly Carrying Charge Percentage (Levelized Carrying Charge Rate / 12 months) | 0.00702 | 0.00702 |
| 5 Applicable Carrying Charge Charge Percentage (Lines 3 x 5) | 0.86% | 0.15% |
| 6 O&M Percentage | 0.32% | 0.32% |
| 7 Total Excess Facilities Charge | 1.17% | 0.47% |

Louisville Gas and Electric Company

Excess Facilities Charges

Electric Service

| | Assuming Customer Does Not Make Contribution In Aid of Construction | Assuming Customer Makes Contribution In Aid of Construction |
|---|--|---|
| 1 Present Value of Replacement Plant as a Percentage of Original Cost | 21.77 | 21.77 |
| 2 Original Cost Value | 100 | - |
| 3 Total Present Value of Original and Replacement Cost Value as a Percentage of Original Cost | 121.77 | 21.77 |
| 4 Monthly Carrying Charge Percentage (Levelized Carrying Charge Rate / 12 months) | 0.00702 | 0.00702 |
| 5 Applicable Carrying Charge Charge Percentage (Lines 3 x 5) | 0.86% | 0.15% |
| 6 O&M Percentage | 0.37% | 0.37% |
| 7 Total Excess Facilities Charge | 1.23% | 0.52% |

Louisville Gas and Electric Company

Excess Facilities Charges
Gas Service

| | Assuming Customer Does Not Make Contribution In Aid of Construction | Assuming Customer Makes Contribution In Aid of Construction |
|---|--|---|
| 1 Present Value of Replacement Plant as a Percentage of Original Cost | 21.77 | 21.77 |
| 2 Original Cost Value | 100 | - |
| 3 Total Present Value of Original and Replacement Cost Value as a Percentage of Original Cost | 121.77 | 21.77 |
| 4 Monthly Carrying Charge Percentage (Levelized Carrying Charge Rate / 12 months) | 0.00699 | 0.00699 |
| 5 Applicable Carrying Charge Charge Percentage (Lines 3 x 5) | 0.85% | 0.15% |
| 6 O&M Percentage | 0.30% | 0.30% |
| 7 Total Excess Facilities Charge | 1.15% | 0.45% |

Exhibit WSS-18

Change in Other Operating Revenues For Excess Facilities Rider

Kentucky Utilities Company/Louisville Gas and Electric Company

Excess Facilities Proposed Rate Change and Revenue Impact

Case Nos. 2020-00349 and 2020-00350

| | <u>Installed Cost of Excess Facilities</u> | <u>Current Rate</u> | <u>Forecasted Test Year Revenue at Current Rate</u> | <u>Proposed Rate</u> | <u>Forecasted Test Year Revenue at Proposed Rate</u> | <u>Revenue Increase (Decrease)</u> |
|--|--|-------------------------|---|--------------------------|--|--|
| <u>Kentucky Utilities Company</u> | | | | | | |
| Excess Facilities Percentage With No Contribution-in-Aid-of-Construction | \$ 9,865,917.88 | 1.16% | \$ 1,373,335.77 | 1.17% | \$ 1,385,174.87 | \$ 11,839 |
| Excess Facilities Percentage With Contribution-in-Aid-of-Construction | \$ 914,769.37 | 0.47% | \$ 51,592.99 | 0.47% | \$ 51,592.99 | \$ (0) |
| Total -- KU | | | | | | <u>\$ 11,839</u> |
| <u>Louisville Gas and Electric Company</u> | | | | | | |
| Excess Facilities Percentage With No Contribution-in-Aid-of-Construction | \$ 4,982,340.73 | 1.22% | \$ 729,414.68 | 1.21% | \$ 723,435.87 | \$ (5,979) |
| Excess Facilities Percentage With Contribution-in-Aid-of-Construction | \$ 1,218,457.13 | 0.52% | \$ 76,031.72 | 0.52% | \$ 76,031.72 | \$ (0) |
| Total -- LG&E | | | | | | <u>\$ (5,979)</u> |

Note: No gas customers are currently taking service under the Excess Facilities Rider and none are projected for the forecasted test year.

Exhibit WSS-19

Cost Support for
Miscellaneous Charges

Summary of Increases (Decreases) to Special Charges

Based on the 12 Months Ended July 31, 2020

| <u>Miscellaneous Charge</u> | <u>Current Charge</u> | <u>Actual Cost</u> | <u>Proposed Charge</u> |
|---|-----------------------|--------------------|------------------------|
| LG&E - Electric | | | |
| Disconnect/Reconnect Charge | \$ 28.00 | \$ 32.22 | \$ 32.00 |
| Returned Check Fee | \$ 3.00 | \$ 3.70 | \$ 3.70 |
| Meter-Test Charge | \$ 75.00 | \$ 78.85 | \$ 79.00 |
| Meter Pulse Relaying | \$ 24.00 | \$ 20.76 | \$ 21.00 |
| UAR without meter replacement | \$ 70.00 | \$ 49.13 | \$ 49.00 |
| UAR Charge for 1/0 Standard Meter Replacement | \$ 90.00 | \$ 70.16 | \$ 70.00 |
| UAR Charge for 1/0 AMR Meter Replacement | \$ 110.00 | \$ 90.97 | \$ 91.00 |
| UAR Charge for 1/0 AMS Meter Replacement | \$ 174.00 | \$ 153.39 | \$ 153.00 |
| UAR Charge for 3/0 Standard Meter Replacement | \$ 177.00 | \$ 158.60 | \$ 159.00 |
| AMI Opt-Out Charge -- One-Time Charge | | \$ 34.66 | \$ 35.00 |
| AMI Opt-Out Charge -- Monthly Charge | | \$ 12.38 | \$ 12.00 |
| LG&E - Gas | | | |
| Disconnect/Reconnect Charge | \$ 28.00 | \$ 32.22 | \$ 32.00 |
| Returned Check Fee | \$ 3.00 | \$ 3.70 | \$ 3.70 |
| Meter-Test Charge | \$ 90.00 | \$ 101.26 | \$ 101.00 |
| Inspection Charge | \$ 150.00 | \$ 155.23 | \$ 155.00 |
| Meter Pulse Relaying Non-FT Non-TS2 | \$ 24.34 | \$ 27.52 | \$ 28.00 |
| Meter Pulse Relaying - FT/TS2 | \$ 7.17 | \$ 8.19 | \$ 8.00 |
| Additional Trip Charge | \$ 150.00 | \$ 155.23 | \$ 155.00 |
| UAR without meter replacement | \$ 70.00 | \$ 49.13 | \$ 49.00 |
| UAR with meter replacement | \$ 132.00 | \$ 113.86 | \$ 114.00 |
| AMI Opt-Out Charge -- One-Time Charge | | \$ 32.63 | \$ 33.00 |
| AMI Opt-Out Charge -- Monthly Charge | | \$ 5.17 | \$ 5.00 |
| KU | | | |
| Disconnect/Reconnect Charge | \$ 28.00 | \$ 37.23 | \$ 37.00 |
| Returned Check Fee | \$ 3.00 | \$ 3.48 | \$ 3.50 |
| Meter-Test Charge | \$ 75.00 | \$ 79.49 | \$ 79.00 |
| Meter Pulse Relaying | \$ 24.00 | \$ 20.87 | \$ 21.00 |
| UAR without meter replacement | \$ 70.00 | \$ 44.68 | \$ 45.00 |
| UAR Charge for 1/0 Standard Meter Replacement | \$ 90.00 | \$ 65.72 | \$ 66.00 |
| UAR Charge for 1/0 AMR Meter Replacement | \$ 110.00 | \$ 86.52 | \$ 87.00 |
| UAR Charge for 1/0 AMS Meter Replacement | \$ 174.00 | \$ 148.95 | \$ 149.00 |
| UAR Charge for 3/0 Standard Meter Replacement | \$ 177.00 | \$ 154.15 | \$ 154.00 |
| AMI Opt-Out Charge -- One-Time Charge | | \$ 38.77 | \$ 39.00 |
| AMI Opt-Out Charge -- Monthly Charge | | \$ 14.87 | \$ 15.00 |

Kentucky Utilities Company
Disconnect/Reconnect
Cost Justification

| | <u>Cost</u> |
|--------------------|-----------------|
| Disconnect Service | \$ 18.62 |
| Reconnect Service | 18.62 |
| | <u>\$ 37.23</u> |

Louisville Gas and Electric Company
Disconnect/Reconnect
Cost Justification

| | <u>Cost</u> |
|--------------------|-----------------|
| Disconnect Service | \$ 16.11 |
| Reconnect Service | 16.11 |
| | <u>\$ 32.22</u> |

Kentucky Utilities Company
Electric Meter Test
Cost Justification

| | <u>Cost</u> |
|--------------------|-------------|
| Labor - One Hour | \$ 74.16 |
| Vehicle - 2/3 Hour | <u>5.32</u> |
| | \$ 79.49 |

Louisville Gas and Electric Company
Electric Meter Test
Cost Justification

| | <u>Cost</u> |
|--------------------|-------------|
| Labor - One Hour | \$ 73.53 |
| Vehicle - 2/3 Hour | <u>5.32</u> |
| | \$ 78.85 |

Louisville Gas and Electric Company
Gas Meter Test
Cost Justification

| | <u>Cost</u> |
|--------------------------------|------------------|
| Labor - One and one third hour | \$ 56.38 |
| Meter Test - One hour | 44.88 |
| | <u>\$ 101.26</u> |

Louisville Gas and Electric Company
Gas Inspection Charge/Additional Trip Charge
Cost Justification

| | Cost | |
|----------------|------|--------|
| Labor | \$ | 146.92 |
| Transportation | | 8.32 |
| | \$ | 155.23 |

Louisville Gas and Electric Company
Returned Check/ACH
Cost Justification

LG&E Returned Check/ACH Costs

| | Returns | Cost | Average |
|--------------------------------------|--|-----------|----------------|
| US Bank/MUFG | 15,484 | \$ 44,767 | \$ 3.01 |
| Labor (incl. burdens) | 65 hours x \$31.55 (straight time labor with burdens) / total LGE/KU returns | | 0.06 |
| Postage/Material | \$.47 postage, plus \$.09 letterhead & \$.05 envelope | | 0.63 |
| Total Per Item Cost at July 31, 2020 | | | <u>\$ 3.70</u> |

Kentucky Utilities Company
Returned Check/ACH
Cost Justification

KU Returned Check/ACH Costs

| | Returns | Cost | Average |
|--------------------------------------|--|-----------|----------------|
| US Bank/MUFG | | 20,041 \$ | 53,694 \$ 2.79 |
| Labor (incl. burdens) | 65 hours x \$31.55 (straight time labor with burdens) / total LGE/KU returns | | 0.06 |
| Postage/Material | \$.47 postage, plus \$.09 letterhead & \$.05 envelope | | 0.63 |
| Total Per Item Cost at July 31, 2020 | | | <u>\$ 3.48</u> |

Louisville Gas and Electric Company
Meter Pulse - ELECTRIC
Cost Justification

| | <u>Cost</u> |
|---|--------------|
| Equipment Installed Costs: | |
| Pulse Relay | 57.84 |
| Pulse Initiator Board | 157.76 |
| Relay Enclosure | 89.40 |
| 5 Hours Labor (loaded) | 364.46 |
| Vehicle 2 hours | <u>12.92</u> |
| Total Cost at July 31, 2020 | 682.38 |
| | |
| Charge per pulse per meter per month (5 Year Contract including carrying costs) | \$ 20.76 |

Louisville Gas and Electric Company
Meter Pulse - GAS
Cost Justification

| | <u>Cost</u> |
|---|--------------|
| <u>Non-FT and Non-TS-2 customer without telemetry</u> | |
| Equipment Installed Costs: | |
| Equipment Costs | 670.01 |
| 3 Hours Labor (loaded) | 211.50 |
| Vehicle | <u>22.04</u> |
| Total Cost at July 31, 2020 | 903.55 |

Charge per pulse per meter per month (5 Year Contract
including carrying costs) \$ 27.52

| | |
|--|--------------|
| <u>FT and TS-2 customer with telemetry</u> | |
| AMI Opt-Out Charge -- One-Time Charge | |
| AMI Opt-Out Charge -- Monthly Charge | |
| Equipment Installed Costs: | |
| Equipment Costs | - |
| 3 Hours Labor (loaded) | 241.40 |
| Vehicle | <u>27.54</u> |
| Total Cost at April 30, 2018 | 268.94 |

Charge per pulse per meter per month (5 Year Contract
including carrying costs) \$ 8.19

Kentucky Utilities Company
Meter Pulse
Cost Justification

| | <u>Cost</u> |
|-----------------------------|--------------|
| Equipment Installed Costs: | |
| Pulse Relay | 57.85 |
| Pulse Initiator Board | 157.77 |
| Relay Enclosure | 89.40 |
| 5 Hours Labor (loaded) | 367.64 |
| Vehicle 2 hours | <u>15.83</u> |
| Total Cost at July 31, 2020 | 688.49 |

Charge per pulse per meter per month (5 Year Contract
including carrying costs) \$ 20.87

Louisville Gas and Electric Company
Electric Unauthorized Meter Reconnect Charge
Cost Justification

| | Cost |
|---|------------------|
| Field Services - (1/4 hour) | \$ 15.57 |
| Transportation - (1/4 hour) | \$ 1.57 |
| Back Office Admin Labor - (1/2 hour) | \$ 20.37 |
| Lock Costs | \$ 11.62 |
| Total Charge without meter replacement at July 31, 2020 | <u>\$ 49.13</u> |
| | |
| Total Charge if meter replacement necessary: | |
| UAR Charge for 1/0 Standard Meter Replacement | |
| Charge without meter replacement | \$ 49.07 |
| Charge for 1/0 Standard Meter Replacement | <u>\$ 21.09</u> |
| | <u>\$ 70.16</u> |
| | |
| UAR Charge for 1/0 AMR Meter Replacement | |
| Charge without meter replacement | \$ 48.92 |
| Charge for 1/0 AMR Meter Replacement | <u>\$ 42.06</u> |
| | <u>\$ 90.97</u> |
| | |
| UAR Charge for 1/0 AMS Meter Replacement | |
| Charge without meter replacement | \$ 48.71 |
| | |
| UAR Charge for 3/0 Standard Meter Replacement | |
| Charge without meter replacement | \$ 48.70 |
| Charge for 3/0 Standard Meter Replacement | <u>\$ 109.90</u> |
| | <u>\$ 158.60</u> |

Labor and transportation costs to inspect and lock service, perform back office requirements and meter replacement if necessary.

Louisville Gas and Electric Company
Gas Unauthorized Meter Reconnect Charge
Cost Justification

| | Cost |
|---|-----------------|
| Field Services - (1/4 hour) | \$ 15.57 |
| Transportation - (1/4 hour) | \$ 1.57 |
| Back Office Admin Labor - (1/2 hour) | \$ 20.37 |
| Lock Costs | \$ 11.62 |
| Total Charge without meter replacement at July 31, 2020 | <u>\$ 49.13</u> |

| | |
|--|------------------|
| Total Charge if meter replacement necessary: | |
| UAR Charge for Standard Meter Replacement | |
| Charge without meter replacement | \$ 48.81 |
| Charge for Standard Meter Replacement | <u>\$ 65.05</u> |
| | <u>\$ 113.86</u> |

Labor and transportation costs to inspect and lock service, perform back office requirements and meter replacement if necessary.

Kentucky Utilities Company
Electric Unauthorized Meter Reconnect Charge
Cost Justification

| | Cost |
|---|----------|
| Field Services - (1/4 hour) | \$ 11.14 |
| Transportation - (1/4 hour) | \$ 1.57 |
| Back Office Admin Labor - (1/2 hour) | \$ 20.36 |
| Lock Costs | \$ 11.61 |
| Total Charge without meter replacement at July 31, 2020 | \$ 44.68 |

Total Charge if meter replacement necessary:

| | |
|---|----------|
| UAR Charge for 1/0 Standard Meter Replacement | |
| Charge without meter replacement | \$ 44.63 |
| Charge for 1/0 Standard Meter Replacement | \$ 21.09 |
| | \$ 65.72 |

| | |
|--|----------|
| UAR Charge for 1/0 AMR Meter Replacement | |
| Charge without meter replacement | \$ 44.49 |
| Charge for 1/0 AMR Meter Replacement | \$ 42.04 |
| | \$ 86.52 |

| | |
|--|-----------|
| UAR Charge for 1/0 AMS Meter Replacement | |
| Charge without meter replacement | \$ 44.30 |
| Charge for 1/0 AMS Meter Replacement | \$ 104.65 |
| | \$ 148.95 |

| | |
|---|-----------|
| UAR Charge for 3/0 Standard Meter Replacement | |
| Charge without meter replacement | \$ 44.29 |
| Charge for 3/0 Standard Meter Replacement | \$ 109.86 |
| | \$ 154.15 |

Labor and transportation costs to inspect and lock service, perform back office requirements and meter replacement if necessary.

LG&E -- Electric AMI Opt-Out Charge

One-Time Fee

| | | |
|--|----|---------|
| 4. Meter Readers | \$ | 59,591 |
| 5. Field Services | \$ | 47,136 |
| 6. Enrollment | \$ | 12,267 |
| 7. One-Time Fee | \$ | 118,995 |
| 8. One-Time Fee costs divided by All Opt-Out Contracts | \$ | 34.66 |

One-Time and Recurring Capital Costs**15 Year Life**

| | | |
|--|----|--------|
| 9. Mesh Network | \$ | 22,281 |
| 10. Enrollment, Billing and Reporting | \$ | 65,174 |
| 11. One-Time and Recurring Capital Costs to be recovered | \$ | 87,455 |
| 12. One-Time and Recurring Capital Costs divided by All Opt-Out Contracts | \$ | 25.47 |
| 13. Monthly Levelized Revenue Requirement Recovery of One-Time and Recurring Capital per Customer ¹ | \$ | 0.43 |

Annual Recurring Costs

| | | |
|--|----|---------|
| 14. Meter Readers | \$ | 487,965 |
| 15. Field Services | \$ | 4,055 |
| 16. Mesh Network | \$ | 326 |
| 17. Annual Recovery of on-going Costs | \$ | 492,346 |
| 18. Monthly Recovery of Recurring Costs per Contract | \$ | 11.95 |
| 19. Total Monthly Fee (13 + 18) | \$ | 12.38 |

LG&E -- Gas AMI Opt-Out Charge

| <u>One-Time Fee</u> | | |
|--|----|---------|
| 4. Meter Readers | \$ | 45,652 |
| 5. Field Services | \$ | 30,776 |
| 6. Enrollment | \$ | 9,398 |
| 7. One-Time Fee | \$ | 85,827 |
| 8. One-Time Fee costs divided by All Opt-Out Contracts | \$ | 32.63 |
| <u>One-Time and Recurring Capital Costs</u> | | |
| <u>15 Year Life</u> | | |
| 9. Mesh Network | \$ | 17,065 |
| 10. Enrollment, Billing and Reporting | \$ | 49,915 |
| 11. One-Time and Recurring Capital Costs to be recovered | \$ | 66,980 |
| 12. <u>One-Time and Recurring Capital Costs divided by All Opt-Out Contracts</u> | \$ | 25.47 |
| 13. Monthly Levelized Revenue Requirement Recovery of One-Time and Recurring Capital per Customer ¹ | \$ | 0.43 |
| <u>Annual Recurring Costs</u> | | |
| 14. Meter Readers | \$ | 146,300 |
| 15. Field Services | \$ | 3,107 |
| 16. Mesh Network | \$ | 250 |
| 17. Annual Recovery of on-going Costs | \$ | 149,657 |
| 18. Monthly Recovery of Recurring Costs per Contract | \$ | 4.74 |
| 19. Total Monthly Fee (13 + 18) | \$ | 5.17 |

Kentucky Utilities -- AMI Opt Out Charges

| | | |
|--|----|---------|
| <u>One-Time Fee</u> | | |
| 4. Meter Readers | \$ | 74,555 |
| 5. Field Services | \$ | 74,938 |
| 6. Enrollment | \$ | 15,176 |
| 7. One-Time Fee | \$ | 164,670 |
| 8. One-Time Fee costs divided by All Opt-Out Contracts | \$ | 38.77 |
| <u>One-Time and Recurring Capital Costs</u> | | |
| <u>15 Year Life</u> | | |
| 9. Mesh Network | \$ | 27,561 |
| 10. Enrollment, Billing and Reporting | \$ | 80,618 |
| 11. One-Time and Recurring Capital Costs to be recovered | \$ | 108,179 |
| 12. One-Time and Recurring Capital Costs divided by All Opt-Out Contracts | \$ | 25.47 |
| 13. Monthly Levelized Revenue Requirement Recovery of One-Time and Recurring Capital per Customer ¹ | \$ | 0.43 |
| <u>Annual Recurring Costs</u> | | |
| 14. Meter Readers | \$ | 722,834 |
| 15. Field Services | \$ | 12,907 |
| 16. Mesh Network | \$ | 403 |
| 17. Annual Recovery of on-going Costs | \$ | 736,144 |
| 18. Monthly Recovery of Recurring Costs per Contract | \$ | 14.44 |
| 19. Total Monthly Fee (13 + 18) | \$ | 14.87 |

Exhibit WSS-20

Change in Other Operating Revenues
For Other Miscellaneous Charges

Summary of Increases (Decreases) to Miscellaneous Charges - Current vs. Proposed

Based on the 12 Months Ended July 31, 2020

| Miscellaneous Charge | LG&E - Electric | LG&E - Gas | KU |
|-------------------------------------|----------------------------|-----------------------|-------------------|
| Disconnect/Reconnect Charge | \$ 139,956 | \$ 10,804 | \$ 384,759 |
| Returned Check Fee* | \$ 8,457 | \$ 2,382 | \$ 10,021 |
| Meter-Test Charge | \$ 76 | \$ - | \$ 168 |
| Meter Pulse Relaying | \$ (3,525) | \$ - | \$ (4,122) |
| Meter Pulse Relaying Non-FT Non-TS2 | | \$ 706 | |
| Meter Pulse Relaying - FT/TS2 | | \$ 46 | |
| Third-Trip Inspection Charge | | \$ - | |
| Additional Trip Charge | | \$ - | |
| Unauthorized Reconnect Charge | \$ (55,505) | \$ (4,977) | \$ (18,399) |
| Total | \$ 89,459 | \$ 8,962 | \$ 372,426 |

Exhibit WSS-21

LOLP Analysis for Electric
Cost of Service Study

Kentucky Utilities Company

LOLP Fixed Production Cost Allocation Factor

For the 12 Months Ended June 30, 2022

| Rate Class | Weighted LOLP |
|-------------------------|--|
| | $\sum_{i=1}^{8760} LOLP_i * \overline{LOAD}_i$ |
| Residential | 1,011,037 |
| General Service | 272,317 |
| All Electric Schools | 17,474 |
| TOD Secondary | 244,227 |
| TOD Primary | 447,085 |
| PS Secondary | 253,947 |
| PS Primary | 11,033 |
| RTS | 145,533 |
| Outdoor Sports Lighting | 30 |
| EV_Charge | 2 |
| Ind. Service Trans. | 60,265 |
| Unmetered Lighting | 393 |
| Traffic Energy Service | 234 |
| Lighting Energy Service | 14 |
| | 2,463,591 |

Louisville Gas & Electric Company

LOLP Fixed Production Cost Allocation Factor

For the 12 Months Ended June 30, 2022

| Rate Class | Weighted LOLP |
|-------------------------|--|
| | $\sum_{i=1}^{8784} LOLP_i * \overline{LOAD}_i$ |
| Residential | 902,573 |
| General Service | 213,017 |
| TOD Secondary | 186,383 |
| TOD Primary | 226,687 |
| PS Secondary | 238,519 |
| PS Primary | 14,423 |
| RTS | 103,765 |
| Spec Contr #1(LWC) | 5,705 |
| Outdoor School Lighting | 1 |
| EV_Charge | 3 |
| Unmetered Lighting | 317 |
| Traffic Energy Svc | 307 |
| Lighting Energy Svc | 11 |
| Total | 1,891,712 |

Exhibit WSS-22

Comparison of LOLP Class Rates of Return with 12-CP and 6-CP Methodologies

| Kentucky Utilities Company | | | |
|--------------------------------------|---|---|---|
| Rate Class | LOLP Current Rate of Return on Rate Base | 12CP Current Rate of Return on Rate Base | 6 CP Current Rate of Return on Rate Base |
| Residential Rate RS | 2.67% | 2.52% | 2.14% |
| General Service Rate GS | 11.05% | 11.32% | 11.21% |
| All Electric Schools Rate AES | 5.89% | 3.17% | 3.68% |
| Power Service Rate PS | 10.28% | 10.07% | 10.41% |
| Time of Day Secondary Rate TODS | 3.95% | 3.93% | 4.68% |
| Time of Day Primary Rate TODP | 3.20% | 3.78% | 4.26% |
| Retail Transmission Service Rate RTS | 3.53% | 3.54% | 4.65% |
| Fluctuating Load Service Rate FLS | 2.75% | 4.98% | 5.40% |
| Lighting Rate LS & RLS | 12.32% | 10.41% | 10.54% |
| Lighting Rate LE | 28.05% | 9.27% | 10.03% |
| Lighting Rate TE | 12.39% | 12.34% | 13.18% |
| Outdoor Sports Lighting Rate OSL | 30.32% | 30.27% | 30.28% |
| Electric Vehicle Charging Rate EV | -27.00% | -27.07% | -27.07% |
| Solar Share Rate SSP | -1.31% | -1.31% | -1.31% |
| Business Solar Rate BS | 4.80% | 4.80% | 4.80% |

| Louisville Gas and Electric Company | | | |
|--|---|---|---|
| Rate Class | LOLP Current Rate of Return on Rate Base | 12CP Current Rate of Return on Rate Base | 6 CP Current Rate of Return on Rate Base |
| Residential Rate RS | 0.60% | 1.75% | 1.33% |
| General Service Rate GS | 10.96% | 9.98% | 9.67% |
| Power Service Rate PS | 10.53% | 8.68% | 9.13% |
| TOD Rate TOD Primary | 6.45% | 5.04% | 6.02% |
| TOD Rate TOD Secondary | 5.33% | 3.96% | 4.44% |
| Retail Transmission Service Rate RTS | 7.23% | 3.75% | 5.76% |
| Special Contract Customer | 5.52% | 2.44% | 3.29% |
| Lighting Rate RLS & LS | 9.74% | 7.79% | 8.02% |
| Lighting Rate LE | 31.88% | 8.24% | 9.82% |
| Lighting Rate TE | 15.01% | 11.82% | 13.90% |
| Outdoor Sports Lighting OSL | 89.10% | 92.28% | 92.63% |
| Electric Vehicle Charging EVC | -27.07% | -27.08% | -27.10% |
| Solar Share SS | 3.60% | 3.60% | 3.60% |
| Business Solar BS | -4.38% | -4.38% | -4.38% |

Exhibit WSS-23

Zero Intercept Analysis

For

Overhead Conductor

(Kentucky Utilities)

**Zero Intercept Analysis
Account 365 -- Overhead Conductor**

July 31, 2020

Weighted Linear Regression Statistics

| | Estimate | Standard Error | T-Statistic |
|-------------------------------|-----------|-------------------|-------------|
| Size Coefficient (\$ per MCM) | 0.0041724 | 0.0008336 | 5.00525 |
| Zero Intercept (\$ per Unit) | 1.3801706 | 0.2486132 | 5.55148 |
| R-Square | 0.8225292 | | |

Plant Classification

| | |
|---|----------------|
| Total Number of Units | 99,629,647 |
| Zero Intercept | 1.3801706 |
| Zero Intercept Cost | \$ 137,505,908 |
| Total Cost of Sample | \$ 214,874,064 |
| Percentage of Total | 0.639937206 |
| Percentage Classified as Customer-Related | 63.99% |
| Percentage Classified as Demand-Related | 36.01% |

Zero Intercept Analysis
Account 365 -- Overhead Conductor

July 31, 2020

| Description | Size | Cost | Quantity | Avg Cost |
|------------------------------|-------------|---------------|-----------------|-----------------|
| #2 Triplex | 66.369 | 15,319,819.64 | 9,502,231.00 | 1.612234 |
| #4 Aluminum Poly | 41.74 | 128,346.24 | 27,617.00 | 4.6473636 |
| #2 ACSR | 66.36 | 1,404,030.05 | 183,400.00 | 7.6555619 |
| 1/0 CONDUCTOR | 105.6 | 4,279,000.42 | 692,306.00 | 6.1807935 |
| 1/0 Triplex | 105.6 | 134,027.21 | 22,210.00 | 6.0345434 |
| 1/0 Aluminum | 105.6 | 117,488.54 | 24,884.00 | 4.7214491 |
| 123,270 ACAR WIRE | 123.27 | 17,139,725.02 | 9,362,717.00 | 1.8306358 |
| 195,700 ACAR WIRE | 195.7 | 2,630,925.27 | 1,873,176.00 | 1.4045265 |
| 2/0 COPPER CONDUCTOR | 133.1 | 1,346,236.36 | 532,633.00 | 2.5275121 |
| 20 M.A.W. MESSENGER WIRE | 20 | 2,855,091.75 | 1,333,578.00 | 2.140926 |
| 336,400 19 STR. ALL ALUMINUM | 336.4 | 9,462,230.02 | 5,646,839.00 | 1.6756685 |
| 350 MCM COPPER CONDUCTOR | 350 | 2,293,985.20 | 85,617.00 | 26.793571 |
| 392,500 24/13 ACAR WIRE | 392.5 | 1,018,369.50 | 863,538.00 | 1.179299 |
| 4 COPPER CONDUCTOR | 41.74 | 20,512,898.86 | 11,855,843.00 | 1.7301932 |
| 4A COPPER CONDUCTOR | 41.74 | 425,395.34 | 76,077.00 | 5.5916419 |
| 6 COPPER CONDUCTOR | 26.25 | 11,935,258.01 | 15,247,078.00 | 0.7827899 |
| 6A COPPER CONDUCTOR | 26.25 | 751,476.51 | 101,690.00 | 7.3898762 |
| 750 MCM COPPER CONDUCTOR | 750 | 853,486.08 | 26,479.00 | 32.232565 |
| 795 MCM ALUMINUM CONDUCTOR | 795 | 52,092,231.22 | 10,827,908.00 | 4.810923 |
| 8 COPPER CONDUCTOR | 16.51 | 714,478.51 | 356,910.00 | 2.001845 |
| 840,200 24/13 ACAR WIRE | 840.2 | 625,715.08 | 212,797.00 | 2.9404319 |
| 1/0 CABLE | 105.6 | 46,299,775.20 | 21,978,822.00 | 2.1065631 |
| 101 MCM ACSR CONDUCTOR | 101 | 1,181.18 | 250.00 | 4.72472 |
| 1272 MCM ACSR CONDUCTOR | 1272 | 79,529.08 | 30,823.00 | 2.5801862 |
| 200 MCM CABLE | 200 | 3,238.76 | 500.00 | 6.47752 |
| 3/0 CONDUCTOR | 167.8 | 6,205,860.32 | 2,056,133.00 | 3.0182193 |
| 300 MCM COPPER CONDUCTOR | 300 | 3,564.60 | 260.00 | 13.71 |
| 4/0 CONDUCTOR | 211.6 | 15,519,658.14 | 6,550,826.00 | 2.3691147 |
| 520 MCM CONDUCTOR | 520 | 688.25 | 112.00 | 6.1450893 |
| 600 MCM CONDUCTOR | 600 | 105,914.75 | 16,060.00 | 6.5949408 |
| 636 MCM ALUMINUM CONDUCTOR | 636 | 21,911.09 | 3,040.00 | 7.2075954 |
| 7/C CONDUCTOR | 20.92 | 18,059.98 | 4,050.00 | 4.4592543 |
| 80 MCM ACSR CONDUCTOR | 80 | 20,945.38 | 11,500.00 | 1.8213374 |
| 954 MCM ACSR CONDUCTOR | 954 | 553,522.85 | 121,743.00 | 4.5466503 |

Zero Intercept Analysis
 Account 365 -- Overhead Conductor

July 31, 2020

| n | y | x | est y | y*n ^{.5} | n ^{.5} | xn ^{.5} |
|------------|----------|----------|-------|-------------------|-----------------|------------------|
| 9,502,231 | 1.61223 | 66.37 | 1.657 | 4969.822299 | 3,082.57 | 204587 |
| 27,617 | 4.64736 | 41.74 | 1.554 | 772.3157654 | 166.18 | 6936.505 |
| 183,400 | 7.65556 | 66.36 | 1.657 | 3278.511696 | 428.25 | 28418.82 |
| 692,306 | 6.18079 | 105.60 | 1.821 | 5142.72476 | 832.05 | 87864.4 |
| 22,210 | 6.03454 | 105.60 | 1.821 | 899.3292067 | 149.03 | 15737.59 |
| 24,884 | 4.72145 | 105.60 | 1.821 | 744.7926988 | 157.75 | 16658.04 |
| 9,362,717 | 1.83064 | 123.27 | 1.895 | 5601.481447 | 3,059.86 | 377188.4 |
| 1,873,176 | 1.40453 | 195.70 | 2.197 | 1922.291387 | 1,368.64 | 267842.9 |
| 532,633 | 2.52751 | 133.10 | 1.936 | 1844.621562 | 729.82 | 97138.66 |
| 1,333,578 | 2.14093 | 20.00 | 1.464 | 2472.355157 | 1,154.81 | 23096.13 |
| 5,646,839 | 1.67567 | 336.40 | 2.784 | 3981.90412 | 2,376.31 | 799390 |
| 85,617 | 26.79357 | 350.00 | 2.841 | 7839.901541 | 292.60 | 102411.3 |
| 863,538 | 1.17930 | 392.50 | 3.018 | 1095.884179 | 929.27 | 364737.5 |
| 11,855,843 | 1.73019 | 41.74 | 1.554 | 5957.455664 | 3,443.23 | 143720.5 |
| 76,077 | 5.59164 | 41.74 | 1.554 | 1542.289987 | 275.82 | 11512.75 |
| 15,247,078 | 0.78279 | 26.25 | 1.490 | 3056.59924 | 3,904.75 | 102499.7 |
| 101,690 | 7.38988 | 26.25 | 1.490 | 2356.547978 | 318.89 | 8370.828 |
| 26,479 | 32.23256 | 750.00 | 4.509 | 5245.001932 | 162.72 | 122042.8 |
| 10,827,908 | 4.81092 | 795.00 | 4.697 | 15830.72049 | 3,290.58 | 2616010 |
| 356,910 | 2.00185 | 16.51 | 1.449 | 1195.941159 | 597.42 | 9863.395 |
| 212,797 | 2.94043 | 840.20 | 4.886 | 1356.419021 | 461.30 | 387583.6 |
| 21,978,822 | 2.10656 | 105.60 | 1.821 | 9875.899834 | 4,688.16 | 495069.4 |
| 250 | 4.72472 | 101.00 | 1.802 | 74.70438253 | 15.81 | 1596.95 |
| 30,823 | 2.58019 | 1,272.00 | 6.687 | 452.9898858 | 175.56 | 223318.4 |
| 500 | 6.47752 | 200.00 | 2.215 | 144.8417505 | 22.36 | 4472.136 |
| 2,056,133 | 3.01822 | 167.80 | 2.080 | 4327.891801 | 1,433.92 | 240612.2 |
| 260 | 13.71000 | 300.00 | 2.632 | 221.0671075 | 16.12 | 4837.355 |
| 6,550,826 | 2.36911 | 211.60 | 2.263 | 6063.649904 | 2,559.46 | 541581.3 |
| 112 | 6.14509 | 520.00 | 3.550 | 65.03351214 | 10.58 | 5503.163 |
| 16,060 | 6.59494 | 600.00 | 3.884 | 835.7640283 | 126.73 | 76036.83 |
| 3,040 | 7.20760 | 636.00 | 4.034 | 397.3993852 | 55.14 | 35066.62 |
| 4,050 | 4.45925 | 20.92 | 1.467 | 283.7852072 | 63.64 | 1331.341 |
| 11,500 | 1.82134 | 80.00 | 1.714 | 195.3166756 | 107.24 | 8579.044 |
| 121,743 | 4.54665 | 954.00 | 5.361 | 1586.403115 | 348.92 | 332866.7 |

Kentucky Utilities Company
 Pri/Sec Splits for Overhead Conductor

| | | Customer | Demand |
|-----------------|--------|-----------------|---------------|
| Overhead | | 63.99% | 36.01% |
| Primary | 70.54% | 0.4514 | 0.2540 |
| Secondary | 29.46% | 0.1885 | 0.1061 |

Exhibit WSS-24

Zero Intercept Analysis

For

Underground Conductor

(Kentucky Utilities)

**Zero Intercept Analysis
Account 367 -- Underground Conductor**

July 31, 2020

Weighted Linear Regression Statistics

| | <u>Estimate</u> | <u>Standard Error</u> | <u>T-Statistic</u> |
|-------------------------------|-----------------|---------------------------|--------------------|
| Size Coefficient (\$ per MCM) | 0.0135482 | 0.0034047 | 3.9792049 |
| Zero Intercept (\$ per Unit) | 4.6531902 | 0.5775615 | 8.0566138 |
| R-Square | 0.8987417 | | |

Plant Classification

| | |
|---|----------------|
| Total Number of Units | 29,539,252 |
| Zero Intercept | 4.6531902 |
| Zero Intercept Cost | \$ 137,451,759 |
| Total Cost of Sample | \$ 183,565,083 |
| Percentage of Total | 0.748790328 |
| Percentage Classified as Customer-Related | 74.88% |
| Percentage Classified as Demand-Related | 25.12% |

Zero Intercept Analysis
Account 367 -- Underground Conductor

July 31, 2020

| Description | Size | Cost | Quantity | Avg Cost |
|----------------------------|-------------|---------------|-----------------|-----------------|
| #12 CABLE | 13.12 | 170,319.13 | 77,929 | 2.185568017 |
| #2 Triplex | 66.36 | 88,747,142.22 | 15,945,949 | 5.565497683 |
| #2 ACSR | 66.36 | 1,564,961.37 | 157,316 | 9.947884322 |
| 1/0 CABLE | 105.6 | 13,237,152.96 | 949,513 | 13.94099181 |
| 1/0 CONDUCTOR | 105.6 | 4,096,996.41 | 206,882 | 19.80354216 |
| 1/0 Triplex | 105.6 | 518,357.22 | 22,986 | 22.55099713 |
| 1000 MCM CONDUCTOR | 1000 | 6,480,812.47 | 364,678 | 17.77132832 |
| 1500 MCM UGAL CABLE | 1500 | 44,861.19 | 4,026 | 11.14286885 |
| 2/0 COPPER CONDUCTOR | 133.1 | 35,657,910.66 | 6,421,560 | 5.552842403 |
| 20 M.A.W. MESSENGER WIRE | 20 | 1,880.60 | 2,834 | 0.663585039 |
| 200 MCM CABLE | 200 | 44,255.13 | 5,194 | 8.520433192 |
| 2000 MCM 1/C 1000V CABLE | 2000 | 501.81 | 578 | 0.868183391 |
| 266 MCM ACSR CONDUCTOR | 266 | 7,717.86 | 400 | 19.29465 |
| 3/0 CONDUCTOR | 167.8 | 994,247.11 | 224,357 | 4.431540402 |
| 300 MCM COPPER CONDUCTOR | 300 | 8,963.91 | 126 | 71.14214286 |
| 350 MCM COPPER CONDUCTOR | 350 | 4,484,214.59 | 431,382 | 10.39499699 |
| 397 MCM ACSR CONDUCTOR | 397 | 736,737.37 | 77,390 | 9.51980062 |
| 4 COPPER CONDUCTOR | 41.74 | 361,501.33 | 44,452 | 8.132397417 |
| 4/0 CONDUCTOR | 211.6 | 22,155,450.85 | 2,874,908 | 7.706490382 |
| 4A COPPER CONDUCTOR | 41.74 | 9,810.69 | 4,140 | 2.369731884 |
| 500 MCM COPPER CONDUCTOR | 500 | 724,136.77 | 68,224 | 10.61410603 |
| 520 MCM CONDUCTOR | 520 | 451.53 | 75 | 6.0204 |
| 6 COPPER CONDUCTOR | 26.25 | 1,814,646.22 | 1,251,654 | 1.449798602 |
| 600 MCM CONDUCTOR | 600 | 76,600.45 | 3,983 | 19.23184785 |
| 6A COPPER CONDUCTOR | 26.25 | 337,831.10 | 299,328 | 1.128631802 |
| 750 MCM COPPER CONDUCTOR | 750 | 1,248,122.15 | 96,109 | 12.98652728 |
| 795 MCM ALUMINUM CONDUCTOR | 795 | 38,247.86 | 2,606 | 14.67684574 |
| 8 COPPER CONDUCTOR | 795 | 1,252.12 | 673 | 1.860505201 |

Zero Intercept Analysis
Account 367 -- Underground Conductor

July 31, 2020

| n | y | x | est y | y*n ^{.5} | n ^{.5} | xn ^{.5} |
|------------|----------|----------|--------|-------------------|-----------------|------------------|
| 77,929 | 2.18557 | 13.12 | 4.831 | 610.1180568 | 279.16 | 3662.548519 |
| 15,945,949 | 5.56550 | 66.36 | 5.552 | 22224.35633 | 3,993.24 | 264991.2677 |
| 157,316 | 9.94788 | 66.36 | 5.552 | 3945.637423 | 396.63 | 26320.4206 |
| 949,513 | 13.94099 | 105.60 | 6.084 | 13584.51475 | 974.43 | 102899.7633 |
| 206,882 | 19.80354 | 105.60 | 6.084 | 9007.499162 | 454.84 | 48031.40285 |
| 22,986 | 22.55100 | 105.60 | 6.084 | 3418.987011 | 151.61 | 16010.15806 |
| 364,678 | 17.77133 | 1,000.00 | 18.201 | 10731.85195 | 603.89 | 603885.7508 |
| 4,026 | 11.14287 | 1,500.00 | 24.975 | 707.0235899 | 63.45 | 95176.15248 |
| 6,421,560 | 5.55284 | 133.10 | 6.456 | 14071.34529 | 2,534.08 | 337286.01 |
| 2,834 | 0.66359 | 20.00 | 4.924 | 35.32616628 | 53.24 | 1064.706532 |
| 5,194 | 8.52043 | 200.00 | 7.363 | 614.0626015 | 72.07 | 14413.8822 |
| 578 | 0.86818 | 2,000.00 | 31.750 | 20.87254435 | 24.04 | 48083.26112 |
| 400 | 19.29465 | 266.00 | 8.257 | 385.893 | 20.00 | 5320 |
| 224,357 | 4.43154 | 167.80 | 6.927 | 2099.058417 | 473.66 | 79480.7156 |
| 126 | 71.14214 | 300.00 | 8.718 | 798.568573 | 11.22 | 3367.491648 |
| 431,382 | 10.39500 | 350.00 | 9.395 | 6827.400468 | 656.80 | 229878.8703 |
| 77,390 | 9.51980 | 397.00 | 10.032 | 2648.318877 | 278.19 | 110441.6611 |
| 44,452 | 8.13240 | 41.74 | 5.219 | 1714.605635 | 210.84 | 8800.312567 |
| 2,874,908 | 7.70649 | 211.60 | 7.520 | 13066.78112 | 1,695.56 | 358779.5155 |
| 4,140 | 2.36973 | 41.74 | 5.219 | 152.47526 | 64.34 | 2685.669798 |
| 68,224 | 10.61411 | 500.00 | 11.427 | 2772.375238 | 261.20 | 130598.6217 |
| 75 | 6.02040 | 520.00 | 11.698 | 52.13819341 | 8.66 | 4503.3321 |
| 1,251,654 | 1.44980 | 26.25 | 5.009 | 1621.996163 | 1,118.77 | 29367.80268 |
| 3,983 | 19.23185 | 600.00 | 12.782 | 1213.741406 | 63.11 | 37866.60798 |
| 299,328 | 1.12863 | 26.25 | 5.009 | 617.4843505 | 547.11 | 14361.60506 |
| 96,109 | 12.98653 | 750.00 | 14.814 | 4026.011965 | 310.01 | 232510.8868 |
| 2,606 | 14.67685 | 795.00 | 15.424 | 749.2382406 | 51.05 | 40583.95188 |
| 673 | 1.86051 | 795.00 | 15.424 | 48.26567903 | 25.94 | 20624.08362 |

Kentucky Utilities Company
Pri/Sec Splits for Underground Conductor

| | | Customer | Demand |
|--------------------|--------|-----------------|---------------|
| Underground | | 74.88% | 25.12% |
| Primary | 60.51% | 0.4531 | 0.1520 |
| Secondary | 39.49% | 0.2957 | 0.0992 |

Exhibit WSS-25

Zero Intercept Analysis

For

Line Transformers

(Kentucky Utilities)

Zero Intercept Analysis
Account 368 - Line Transformers

July 31, 2020

Weighted Linear Regression Statistics

| | Estimate | Standard Error | T-Statistic |
|-------------------------------|------------|-------------------|-------------|
| Size Coefficient (\$ per kVA) | 11.7345763 | 0.4657978 | 25.19242516 |
| Zero Intercept (\$ per Unit) | 461.59 | 63.5020377 | 7.268833323 |
| R-Square | 0.9507396 | | |

Plant Classification

| | |
|---|----------------|
| Total Number of Units | 249,063 |
| Zero Intercept | \$ 461.59 |
| Zero Intercept Cost | \$ 114,963,926 |
| Total Cost of Sample | \$ 253,336,808 |
| Percentage of Total | 0.453798748 |
| Percentage Classified as Customer-Related | 45.38% |
| Percentage Classified as Demand-Related | 54.62% |

Zero Intercept Analysis
Account 368 - Line Transformers

July 31, 2020

| Description | Size | Cost | Quantity | Avg Cost |
|----------------------------------|-------|-------------|----------|----------|
| TRANSFORMERS - OH 1P - .6 KVA | 0.6 | 473.46 | 1 | 473.46 |
| TRANSFORMERS - OH 1P - 1 KVA | 1 | 14547.14 | 34 | 427.86 |
| TRANSFORMERS - OH 1P - 1.5 KVA | 1.5 | 111.09 | 1 | 111.09 |
| TRANSFORMERS - OH 1P - 10 KVA | 10 | 7656216.94 | 20187 | 379.26 |
| TRANSFORMERS - OH 1P - 100 KVA | 100 | 6238699.31 | 4220 | 1478.36 |
| TRANSFORMERS - OH 1P - 1250 KVA | 1250 | 148540.75 | 14 | 10610.05 |
| TRANSFORMERS - OH 1P - 15 KVA | 15 | 29737938.25 | 55627 | 534.60 |
| TRANSFORMERS - OH 1P - 150 KVA | 150 | 1793.73 | 3 | 597.91 |
| TRANSFORMERS - OH 1P - 167 KVA | 167 | 4153323.94 | 2190 | 1896.49 |
| TRANSFORMERS - OH 1P - 25 KVA | 25 | 42001035.64 | 63554 | 660.87 |
| TRANSFORMERS - OH 1P - 250 KVA | 250 | 1019916.05 | 286 | 3566.14 |
| TRANSFORMERS - OH 1P - 3 KVA | 3 | 34061.05 | 64 | 532.20 |
| TRANSFORMERS - OH 1P - 333 KVA | 333 | 515097.04 | 131 | 3932.04 |
| TRANSFORMERS - OH 1P - 37.5 KVA | 37.5 | 25074741.13 | 31674 | 791.65 |
| TRANSFORMERS - OH 1P - 5 KVA | 5 | 318277.27 | 1770 | 179.82 |
| TRANSFORMERS - OH 1P - 50 KVA | 50 | 19945734.75 | 15726 | 1268.33 |
| TRANSFORMERS - OH 1P - 500 KVA | 500 | 1061113.17 | 218 | 4867.49 |
| TRANSFORMERS - OH 1P - 667 KVA | 667 | 92692.95 | 17 | 5452.53 |
| TRANSFORMERS - OH 1P - 7.5 KVA | 7.5 | 946.90 | 2 | 473.45 |
| TRANSFORMERS - OH 1P - 75 KVA | 75 | 8415318.29 | 6787 | 1239.92 |
| TRANSFORMERS - OH 1P - 833 KVA | 833 | 215904.20 | 19 | 11363.38 |
| TRANSFORMERS - PM 1P - 10 KVA | 10 | 114272.74 | 149 | 766.93 |
| TRANSFORMERS - PM 1P - 100 KVA | 100 | 2840373.40 | 1485 | 1912.71 |
| TRANSFORMERS - PM 1P - 15 KVA | 15 | 2711728.77 | 3007 | 901.81 |
| TRANSFORMERS - PM 1P - 150 KVA | 150 | 78245.20 | 16 | 4890.33 |
| TRANSFORMERS - PM 1P - 167 KVA | 167 | 2686250.55 | 1087 | 2471.25 |
| TRANSFORMERS - PM 1P - 225 KVA | 225 | 27212.10 | 4 | 6803.03 |
| TRANSFORMERS - PM 1P - 25 KVA | 25 | 11914778.09 | 11668 | 1021.15 |
| TRANSFORMERS - PM 1P - 250 KVA | 250 | 2101925.21 | 527 | 3988.47 |
| TRANSFORMERS - PM 1P - 333 KVA | 333 | 3901.90 | 2 | 1950.95 |
| TRANSFORMERS - PM 1P - 37.5 KVA | 37.5 | 11062540.89 | 9937 | 1113.27 |
| TRANSFORMERS - PM 1P - 50 KVA | 50 | 9958889.97 | 8204 | 1213.91 |
| TRANSFORMERS - PM 1P - 75 KVA | 75 | 4866865.69 | 3242 | 1501.19 |
| TRANSFORMERS - PM 3P - 1000 KVA | 1000 | 4797246.42 | 382 | 12558.24 |
| TRANSFORMERS - PM 3P - 112 KVA | 112 | 72785.98 | 25 | 2911.44 |
| TRANSFORMERS - PM 3P - 112.5 KVA | 112.5 | 766431.89 | 213 | 3598.27 |
| TRANSFORMERS - PM 3P - 1250 KVA | 1250 | 14355.37 | 2 | 7177.69 |
| TRANSFORMERS - PM 3P - 150 KVA | 150 | 4396405.79 | 963 | 4565.32 |
| TRANSFORMERS - PM 3P - 1500 KVA | 1500 | 5590700.76 | 315 | 17748.26 |
| TRANSFORMERS - PM 3P - 2000 KVA | 2000 | 3328373.35 | 138 | 24118.65 |
| TRANSFORMERS - PM 3P - 225 KVA | 225 | 3119782.71 | 626 | 4983.68 |
| TRANSFORMERS - PM 3P - 2500 KVA | 2500 | 3955764.43 | 180 | 21976.47 |
| TRANSFORMERS - PM 3P - 300 KVA | 300 | 6384804.22 | 1085 | 5884.61 |
| TRANSFORMERS - PM 3P - 3000 KVA | 3000 | 938652.94 | 25 | 37546.12 |
| TRANSFORMERS - PM 3P - 333 KVA | 333 | 117861.40 | 33 | 3571.56 |
| TRANSFORMERS - PM 3P - 45 KVA | 45 | 363190.52 | 114 | 3185.88 |
| TRANSFORMERS - PM 3P - 500 KVA | 500 | 8876810.49 | 1098 | 8084.53 |
| TRANSFORMERS - PM 3P - 75 KVA | 75 | 3124217.98 | 862 | 3624.38 |
| TRANSFORMERS - PM 3P - 750 KVA | 750 | 12443128.19 | 1143 | 10886.38 |
| TRANSFORMERS - PM 3P - 833 KVA | 833 | 32827.56 | 6 | 5471.26 |

Zero Intercept Analysis
Account 368 - Line Transformers

July 31, 2020

| n | y | x | est y | y*n ^{.5} | n ^{.5} | xn ^{.5} |
|--------|--------|----------|-----------|-------------------|-----------------|------------------|
| 1 | 473 | 0.60 | 289 | 473.46 | 1.00 | 0.6 |
| 34 | 428 | 1.00 | 473 | 2494.813928 | 5.83 | 5.830951895 |
| 1 | 111 | 1.50 | 704 | 111.09 | 1.00 | 1.5 |
| 20,187 | 379 | 10.00 | 4,628 | 53886.29685 | 142.08 | 1420.809628 |
| 4,220 | 1,478 | 100.00 | 46,170 | 96036.83274 | 64.96 | 6496.152708 |
| 14 | 10,610 | 1,250.00 | 576,994 | 39699.18532 | 3.74 | 4677.071733 |
| 55,627 | 535 | 15.00 | 6,936 | 126086.3393 | 235.85 | 3537.806524 |
| 3 | 598 | 150.00 | 69,250 | 1035.610498 | 1.73 | 259.8076211 |
| 2,190 | 1,896 | 167.00 | 77,097 | 88751.10071 | 46.80 | 7815.171783 |
| 63,554 | 661 | 25.00 | 11,551 | 166605.2008 | 252.10 | 6302.479671 |
| 286 | 3,566 | 250.00 | 115,408 | 60308.90032 | 16.91 | 4227.883631 |
| 64 | 532 | 3.00 | 1,396 | 4257.63125 | 8.00 | 24 |
| 131 | 3,932 | 333.00 | 153,720 | 45004.23734 | 11.45 | 3811.359206 |
| 31,674 | 792 | 37.50 | 17,321 | 140891.5678 | 177.97 | 6673.946546 |
| 1,770 | 180 | 5.00 | 2,320 | 7565.175216 | 42.07 | 210.3568397 |
| 15,726 | 1,268 | 50.00 | 23,091 | 159052.6479 | 125.40 | 6270.167462 |
| 218 | 4,867 | 500.00 | 230,805 | 71867.6523 | 14.76 | 7382.41153 |
| 17 | 5,453 | 667.00 | 307,889 | 22481.34256 | 4.12 | 2750.111452 |
| 2 | 473 | 7.50 | 3,474 | 669.5594111 | 1.41 | 10.60660172 |
| 6,787 | 1,240 | 75.00 | 34,631 | 102148.4126 | 82.38 | 6178.743804 |
| 19 | 11,363 | 833.00 | 384,513 | 49531.82049 | 4.36 | 3630.96282 |
| 149 | 767 | 10.00 | 4,628 | 9361.587625 | 12.21 | 122.0655562 |
| 1,485 | 1,913 | 100.00 | 46,170 | 73707.58976 | 38.54 | 3853.569774 |
| 3,007 | 902 | 15.00 | 6,936 | 49451.50743 | 54.84 | 822.5417923 |
| 16 | 4,890 | 150.00 | 69,250 | 19561.3 | 4.00 | 600 |
| 1,087 | 2,471 | 167.00 | 77,097 | 81476.38382 | 32.97 | 5505.937068 |
| 4 | 6,803 | 225.00 | 103,869 | 13606.05 | 2.00 | 450 |
| 11,668 | 1,021 | 25.00 | 11,551 | 110303.1075 | 108.02 | 2700.462923 |
| 527 | 3,988 | 250.00 | 115,408 | 91561.30026 | 22.96 | 5739.120142 |
| 2 | 1,951 | 333.00 | 153,720 | 2759.05995 | 1.41 | 470.9331163 |
| 9,937 | 1,113 | 37.50 | 17,321 | 110975.5342 | 99.68 | 3738.168836 |
| 8,204 | 1,214 | 50.00 | 23,091 | 109950.7278 | 90.58 | 4528.79675 |
| 3,242 | 1,501 | 75.00 | 34,631 | 85475.73737 | 56.94 | 4270.392254 |
| 382 | 12,558 | 1,000.00 | 461,597 | 245448.4794 | 19.54 | 19544.82029 |
| 25 | 2,911 | 112.00 | 51,709 | 14557.196 | 5.00 | 560 |
| 213 | 3,598 | 112.50 | 51,940 | 52515.04779 | 14.59 | 1641.883446 |
| 2 | 7,178 | 1,250.00 | 576,994 | 10150.77947 | 1.41 | 1767.766953 |
| 963 | 4,565 | 150.00 | 69,250 | 141672.1966 | 31.03 | 4654.836195 |
| 315 | 17,748 | 1,500.00 | 692,390 | 315000.3023 | 17.75 | 26622.35902 |
| 138 | 24,119 | 2,000.00 | 923,183 | 283329.9551 | 11.75 | 23494.68025 |
| 626 | 4,984 | 225.00 | 103,869 | 124691.595 | 25.02 | 5629.498201 |
| 180 | 21,976 | 2,500.00 | 1,153,976 | 294845.2723 | 13.42 | 33541.01966 |
| 1,085 | 5,885 | 300.00 | 138,487 | 193835.2308 | 32.94 | 9881.801455 |
| 25 | 37,546 | 3,000.00 | 1,384,769 | 187730.588 | 5.00 | 15000 |
| 33 | 3,572 | 333.00 | 153,720 | 20517.03624 | 5.74 | 1912.939361 |
| 114 | 3,186 | 45.00 | 20,783 | 34015.90879 | 10.68 | 480.4685213 |
| 1,098 | 8,085 | 500.00 | 230,805 | 267889.5534 | 33.14 | 16568.04153 |
| 862 | 3,624 | 75.00 | 34,631 | 106411.2867 | 29.36 | 2201.987738 |
| 1,143 | 10,886 | 750.00 | 346,201 | 368049.6932 | 33.81 | 25356.21226 |
| 6 | 5,471 | 833.00 | 384,513 | 13401.79525 | 2.45 | 2040.424956 |

Exhibit WSS-26

Zero Intercept Analysis

For

Overhead Conductor

(Louisville Gas and Electric Company)

**Zero Intercept Analysis
Account 365 -- Overhead Conductor**

July 31, 2020

Weighted Linear Regression Statistics

| | Estimate | Standard Error | T-Statistic |
|-------------------------------|-----------|-------------------|-------------|
| Size Coefficient (\$ per MCM) | 0.0041724 | 0.0008336 | 5.00525 |
| Zero Intercept (\$ per Unit) | 1.3801706 | 0.2486132 | 5.55148 |
| R-Square | 0.8225292 | | |

Plant Classification

| | |
|---|----------------|
| Total Number of Units | 99,629,647 |
| Zero Intercept | 1.3801706 |
| Zero Intercept Cost | \$ 137,505,908 |
| Total Cost of Sample | \$ 214,874,064 |
| Percentage of Total | 0.639937206 |
| Percentage Classified as Customer-Related | 63.99% |
| Percentage Classified as Demand-Related | 36.01% |

Zero Intercept Analysis
Account 365 -- Overhead Conductor

July 31, 2020

| Description | Size | Cost | Quantity | Avg Cost |
|------------------------------|-------------|---------------|-----------------|-----------------|
| #2 Triplex | 66.369 | 15,319,819.64 | 9,502,231.00 | 1.612234 |
| #4 Aluminum Poly | 41.74 | 128,346.24 | 27,617.00 | 4.6473636 |
| #2 ACSR | 66.36 | 1,404,030.05 | 183,400.00 | 7.6555619 |
| 1/0 CONDUCTOR | 105.6 | 4,279,000.42 | 692,306.00 | 6.1807935 |
| 1/0 Triplex | 105.6 | 134,027.21 | 22,210.00 | 6.0345434 |
| 1/0 Aluminum | 105.6 | 117,488.54 | 24,884.00 | 4.7214491 |
| 123,270 ACAR WIRE | 123.27 | 17,139,725.02 | 9,362,717.00 | 1.8306358 |
| 195,700 ACAR WIRE | 195.7 | 2,630,925.27 | 1,873,176.00 | 1.4045265 |
| 2/0 COPPER CONDUCTOR | 133.1 | 1,346,236.36 | 532,633.00 | 2.5275121 |
| 20 M.A.W. MESSENGER WIRE | 20 | 2,855,091.75 | 1,333,578.00 | 2.140926 |
| 336,400 19 STR. ALL ALUMINUM | 336.4 | 9,462,230.02 | 5,646,839.00 | 1.6756685 |
| 350 MCM COPPER CONDUCTOR | 350 | 2,293,985.20 | 85,617.00 | 26.793571 |
| 392,500 24/13 ACAR WIRE | 392.5 | 1,018,369.50 | 863,538.00 | 1.179299 |
| 4 COPPER CONDUCTOR | 41.74 | 20,512,898.86 | 11,855,843.00 | 1.7301932 |
| 4A COPPER CONDUCTOR | 41.74 | 425,395.34 | 76,077.00 | 5.5916419 |
| 6 COPPER CONDUCTOR | 26.25 | 11,935,258.01 | 15,247,078.00 | 0.7827899 |
| 6A COPPER CONDUCTOR | 26.25 | 751,476.51 | 101,690.00 | 7.3898762 |
| 750 MCM COPPER CONDUCTOR | 750 | 853,486.08 | 26,479.00 | 32.232565 |
| 795 MCM ALUMINUM CONDUCTOR | 795 | 52,092,231.22 | 10,827,908.00 | 4.810923 |
| 8 COPPER CONDUCTOR | 16.51 | 714,478.51 | 356,910.00 | 2.001845 |
| 840,200 24/13 ACAR WIRE | 840.2 | 625,715.08 | 212,797.00 | 2.9404319 |
| 1/0 CABLE | 105.6 | 46,299,775.20 | 21,978,822.00 | 2.1065631 |
| 101 MCM ACSR CONDUCTOR | 101 | 1,181.18 | 250.00 | 4.72472 |
| 1272 MCM ACSR CONDUCTOR | 1272 | 79,529.08 | 30,823.00 | 2.5801862 |
| 200 MCM CABLE | 200 | 3,238.76 | 500.00 | 6.47752 |
| 3/0 CONDUCTOR | 167.8 | 6,205,860.32 | 2,056,133.00 | 3.0182193 |
| 300 MCM COPPER CONDUCTOR | 300 | 3,564.60 | 260.00 | 13.71 |
| 4/0 CONDUCTOR | 211.6 | 15,519,658.14 | 6,550,826.00 | 2.3691147 |
| 520 MCM CONDUCTOR | 520 | 688.25 | 112.00 | 6.1450893 |
| 600 MCM CONDUCTOR | 600 | 105,914.75 | 16,060.00 | 6.5949408 |
| 636 MCM ALUMINUM CONDUCTOR | 636 | 21,911.09 | 3,040.00 | 7.2075954 |
| 7/C CONDUCTOR | 20.92 | 18,059.98 | 4,050.00 | 4.4592543 |
| 80 MCM ACSR CONDUCTOR | 80 | 20,945.38 | 11,500.00 | 1.8213374 |
| 954 MCM ACSR CONDUCTOR | 954 | 553,522.85 | 121,743.00 | 4.5466503 |

Zero Intercept Analysis
 Account 365 -- Overhead Conductor

July 31, 2020

| n | y | x | est y | y^n^5 | n^5 | xn^5 |
|------------|----------|----------|-------|-------------|----------|----------|
| 9,502,231 | 1.61223 | 66.37 | 1.657 | 4969.822299 | 3,082.57 | 204587 |
| 27,617 | 4.64736 | 41.74 | 1.554 | 772.3157654 | 166.18 | 6936.505 |
| 183,400 | 7.65556 | 66.36 | 1.657 | 3278.511696 | 428.25 | 28418.82 |
| 692,306 | 6.18079 | 105.60 | 1.821 | 5142.72476 | 832.05 | 87864.4 |
| 22,210 | 6.03454 | 105.60 | 1.821 | 899.3292067 | 149.03 | 15737.59 |
| 24,884 | 4.72145 | 105.60 | 1.821 | 744.7926988 | 157.75 | 16658.04 |
| 9,362,717 | 1.83064 | 123.27 | 1.895 | 5601.481447 | 3,059.86 | 377188.4 |
| 1,873,176 | 1.40453 | 195.70 | 2.197 | 1922.291387 | 1,368.64 | 267842.9 |
| 532,633 | 2.52751 | 133.10 | 1.936 | 1844.621562 | 729.82 | 97138.66 |
| 1,333,578 | 2.14093 | 20.00 | 1.464 | 2472.355157 | 1,154.81 | 23096.13 |
| 5,646,839 | 1.67567 | 336.40 | 2.784 | 3981.90412 | 2,376.31 | 799390 |
| 85,617 | 26.79357 | 350.00 | 2.841 | 7839.901541 | 292.60 | 102411.3 |
| 863,538 | 1.17930 | 392.50 | 3.018 | 1095.884179 | 929.27 | 364737.5 |
| 11,855,843 | 1.73019 | 41.74 | 1.554 | 5957.455664 | 3,443.23 | 143720.5 |
| 76,077 | 5.59164 | 41.74 | 1.554 | 1542.289987 | 275.82 | 11512.75 |
| 15,247,078 | 0.78279 | 26.25 | 1.490 | 3056.59924 | 3,904.75 | 102499.7 |
| 101,690 | 7.38988 | 26.25 | 1.490 | 2356.547978 | 318.89 | 8370.828 |
| 26,479 | 32.23256 | 750.00 | 4.509 | 5245.001932 | 162.72 | 122042.8 |
| 10,827,908 | 4.81092 | 795.00 | 4.697 | 15830.72049 | 3,290.58 | 2616010 |
| 356,910 | 2.00185 | 16.51 | 1.449 | 1195.941159 | 597.42 | 9863.395 |
| 212,797 | 2.94043 | 840.20 | 4.886 | 1356.419021 | 461.30 | 387583.6 |
| 21,978,822 | 2.10656 | 105.60 | 1.821 | 9875.899834 | 4,688.16 | 495069.4 |
| 250 | 4.72472 | 101.00 | 1.802 | 74.70438253 | 15.81 | 1596.95 |
| 30,823 | 2.58019 | 1,272.00 | 6.687 | 452.9898858 | 175.56 | 223318.4 |
| 500 | 6.47752 | 200.00 | 2.215 | 144.8417505 | 22.36 | 4472.136 |
| 2,056,133 | 3.01822 | 167.80 | 2.080 | 4327.891801 | 1,433.92 | 240612.2 |
| 260 | 13.71000 | 300.00 | 2.632 | 221.0671075 | 16.12 | 4837.355 |
| 6,550,826 | 2.36911 | 211.60 | 2.263 | 6063.649904 | 2,559.46 | 541581.3 |
| 112 | 6.14509 | 520.00 | 3.550 | 65.03351214 | 10.58 | 5503.163 |
| 16,060 | 6.59494 | 600.00 | 3.884 | 835.7640283 | 126.73 | 76036.83 |
| 3,040 | 7.20760 | 636.00 | 4.034 | 397.3993852 | 55.14 | 35066.62 |
| 4,050 | 4.45925 | 20.92 | 1.467 | 283.7852072 | 63.64 | 1331.341 |
| 11,500 | 1.82134 | 80.00 | 1.714 | 195.3166756 | 107.24 | 8579.044 |
| 121,743 | 4.54665 | 954.00 | 5.361 | 1586.403115 | 348.92 | 332866.7 |

Louisville Gas & Electric Company
Pri/Sec Splits for Overhead Conductor

| | | Customer | Demand |
|-----------------|--------|-----------------|---------------|
| Overhead | | 63.99% | 36.01% |
| Primary | 70.52% | 0.451257 | 0.253943 |
| Secondary | 29.48% | 0.188643 | 0.106157 |

Exhibit WSS-27

Zero Intercept Analysis

For

Underground Conductor

(Louisville Gas and Electric Company)

**Zero Intercept Analysis
Account 367 -- Underground Conductor**

July 31, 2020

Weighted Linear Regression Statistics

| | Estimate | Standard Error | T-Statistic |
|-------------------------------|-----------------|---------------------------|--------------------|
| Size Coefficient (\$ per MCM) | 0.0120160 | 0.0020905 | 5.74802331 |
| Zero Intercept (\$ per Unit) | 3.6032354 | 0.6693966 | 5.38281094 |
| R-Square | 0.8880539 | | |

Plant Classification

| | |
|---|---------------|
| Total Number of Units | 28,418,282 |
| Zero Intercept | 3.6032354 |
| Zero Intercept Cost | \$102,397,759 |
| Total Cost of Sample | 171,072,223 |
| Percentage of Total | 0.598564498 |
| Percentage Classified as Customer-Related | 59.86% |
| Percentage Classified as Demand-Related | 40.14% |

Zero Intercept Analysis
Account 367 -- Underground Conductor

July 31, 2020

| Description | Size | Cost | Quantity | Avg Cost |
|------------------------------|-------------|---------------|-----------------|-----------------|
| #12 CABLE | 13.12 | 2,112,678.09 | 745,191 | 2.83508267 |
| #2 ACSR | 66.36 | 1,557,878.07 | 156,578 | 9.949533587 |
| 1/0 CONDUCTOR | 105.6 | 7,195,209.68 | 492,534 | 14.60855429 |
| 1000 MCM CONDUCTOR | 1000 | 31,580,920.64 | 2,179,943 | 14.48703963 |
| 2/0 COPPER CONDUCTOR | 133.1 | 3,012,847.79 | 599,963 | 5.021722656 |
| 200 MCM 1/C 500/600V CABLE | 200 | 28,562.39 | 1,550 | 18.42734839 |
| 250 MCM COPPER CONDUCTOR | 250 | 161,508.10 | 111,488 | 1.448659049 |
| 350 MCM COPPER CONDUCTOR | 350 | 16,509,361.29 | 1,003,510 | 16.45161612 |
| 4 COPPER CONDUCTOR | 41.74 | 827,737.92 | 655,174 | 1.263386398 |
| 6 COPPER CONDUCTOR | 26.25 | 1,303,875.94 | 551,368 | 2.364801621 |
| 750 MCM COPPER CONDUCTOR | 750 | 4,691,977.35 | 268,440 | 17.47868183 |
| 795 MCM ALUMINUM CONDUCTOR | 795 | 502,850.86 | 53,029 | 9.482563503 |
| 8 COPPER CONDUCTOR | 16.51 | 26,725.53 | 18,183 | 1.469808612 |
| #2 Triplex | 66.36 | 17,758,638.68 | 3,500,675 | 5.072918417 |
| 1/0 CABLE | 105.6 | 56,010,718.58 | 12,543,200 | 4.465424978 |
| 123,270 ACAR WIRE | 123.27 | 7,397.12 | 496 | 14.91354839 |
| 195,700 ACAR WIRE | 195.7 | 10,289.60 | 7,611 | 1.351937984 |
| 3/0 CONDUCTOR | 167.8 | 327,842.85 | 31,894 | 10.27913871 |
| 336,400 19 STR. ALL ALUMINUM | 336.4 | 95,736.62 | 2,289 | 41.82464832 |
| 4/0 CONDUCTOR | 211.6 | 27,020,420.38 | 5440647 | 4.966398368 |
| 600 MCM CONDUCTOR | 600 | 21,636.43 | 1634 | 13.24138923 |
| 6A COPPER CONDUCTOR | 26.25 | 307,231.56 | 52777 | 5.821315346 |
| 840,200 24/13 ACAR WIRE | 840.2 | 177.03 | 108 | 1.639166667 |

Zero Intercept Analysis
 Account 367 -- Underground Conductor

July 31, 2020

| n | y | x | est y | y*n ^{.5} | n ^{.5} | xn ^{.5} |
|------------|----------|----------|--------|-------------------|-----------------|------------------|
| 745,191 | 2.83508 | 13.12 | 3.761 | 2447.369412 | 863.24 | 11325.76733 |
| 156,578 | 9.94953 | 66.36 | 4.401 | 3937.02428 | 395.70 | 26258.61091 |
| 492,534 | 14.60855 | 105.60 | 4.872 | 10252.39539 | 701.81 | 74110.88953 |
| 2,179,943 | 14.48704 | 1,000.00 | 15.619 | 21389.57805 | 1,476.46 | 1476463.003 |
| 599,963 | 5.02172 | 133.10 | 5.203 | 3889.689706 | 774.57 | 103095.6377 |
| 1,550 | 18.42735 | 200.00 | 6.006 | 725.4854315 | 39.37 | 7874.007874 |
| 111,488 | 1.44866 | 250.00 | 6.607 | 483.7046314 | 333.90 | 83474.54702 |
| 1,003,510 | 16.45162 | 350.00 | 7.809 | 16480.46341 | 1,001.75 | 350613.7119 |
| 655,174 | 1.26339 | 41.74 | 4.105 | 1022.62057 | 809.43 | 33785.53279 |
| 551,368 | 2.36480 | 26.25 | 3.919 | 1755.963535 | 742.54 | 19491.71651 |
| 268,440 | 17.47868 | 750.00 | 12.615 | 9055.914048 | 518.11 | 388583.9678 |
| 53,029 | 9.48256 | 795.00 | 13.156 | 2183.647227 | 230.28 | 183072.8099 |
| 18,183 | 1.46981 | 16.51 | 3.802 | 198.1953939 | 134.84 | 2226.280296 |
| 3,500,675 | 5.07292 | 66.36 | 4.401 | 9491.476451 | 1,871.01 | 124160.1629 |
| 12,543,200 | 4.46542 | 105.60 | 4.872 | 15814.91896 | 3,541.64 | 373996.9769 |
| 496 | 14.91355 | 123.27 | 5.084 | 332.1404929 | 22.27 | 2745.353252 |
| 7,611 | 1.35194 | 195.70 | 5.955 | 117.9444831 | 87.24 | 17073.07258 |
| 31,894 | 10.27914 | 167.80 | 5.620 | 1835.740213 | 178.59 | 29967.21967 |
| 2,289 | 41.82465 | 336.40 | 7.645 | 2001.037347 | 47.84 | 16094.55167 |
| 5,440,647 | 4.96640 | 211.60 | 6.146 | 11584.22081 | 2,332.52 | 493561.1163 |
| 1,634 | 13.24139 | 600.00 | 10.813 | 535.2535765 | 40.42 | 24253.65952 |
| 52,777 | 5.82132 | 26.25 | 3.919 | 1337.345055 | 229.73 | 6030.476893 |
| 108 | 1.63917 | 840.20 | 13.699 | 17.03471969 | 10.39 | 8731.614531 |

Louisville Gas & Electric Company
Pri/Sec Splits for Underground Conductor

| | | Customer | Demand |
|--------------------|--------|-----------------|---------------|
| Underground | | 59.86% | 40.14% |
| Primary | 88.07% | 0.527187 | 0.353513 |
| Secondary | 11.93% | 0.071413 | 0.047887 |

Exhibit WSS-28

Zero Intercept Analysis

For

Line Transformers

(Louisville Gas and Electric Company)

**Zero Intercept Analysis
Account 368 - Line Transformers**

July 31, 2020

Weighted Linear Regression Statistics

| | Estimate | Standard Error | T-Statistic |
|-------------------------------|------------|-------------------|-------------|
| Size Coefficient (\$ per KVA) | 17.6357155 | 1.1732790 | 15.03113556 |
| Zero Intercept (\$ per Unit) | 771.57 | 239.3973453 | 3.2229544 |
| R-Square | 0.9017152 | | |

Plant Classification

| | |
|---|---------------|
| Total Number of Units | 36,724 |
| Zero Intercept | \$ 771.57 |
| Zero Intercept Cost | \$ 28,335,016 |
| Total Cost of Sample | \$ 79,168,555 |
| Percentage of Total | 0.357907459 |
| Percentage Classified as Customer-Related | 35.79% |
| Percentage Classified as Demand-Related | 64.21% |

Zero Intercept Analysis
Account 368 - Line Transformers

July 31, 2020

| | Size | Cost | Quantity | Avg Cost |
|---------------------------------|------|------------|----------|----------|
| TRANSFORMERS - OH 1P - 100 KVA | 100 | 1356037.78 | 528 | 2568.25 |
| TRANSFORMERS - OH 1P - 1 KVA | 1 | 101798.01 | 191 | 532.97 |
| TRANSFORMERS - OH 1P - 15 KVA | 15 | 2829522.18 | 3564 | 793.92 |
| TRANSFORMERS - OH 1P - 150 KVA | 150 | 239101.48 | 64 | 3735.96 |
| TRANSFORMERS - OH 1P - 167 KVA | 167 | 888091.76 | 327 | 2715.88 |
| TRANSFORMERS - OH 1P - 25 KVA | 25 | 6591201.39 | 6546 | 1006.91 |
| TRANSFORMERS - OH 1P - 250 KVA | 250 | 143562.02 | 30 | 4785.40 |
| TRANSFORMERS - OH 1P - 3 KVA | 3 | 27315.31 | 28 | 975.55 |
| TRANSFORMERS - OH 1P - 333 KVA | 333 | 14112.54 | 2 | 7056.27 |
| TRANSFORMERS - OH 1P - 37.5 KVA | 37.5 | 6831989.67 | 6068 | 1125.90 |
| TRANSFORMERS - OH 1P - 50 KVA | 50 | 5257198.70 | 3367 | 1561.39 |
| TRANSFORMERS - OH 1P - 500 KVA | 500 | 379912.35 | 97 | 3916.62 |
| TRANSFORMERS - OH 1P - 75 KVA | 75 | 2131164.69 | 1082 | 1969.65 |
| TRANSFORMERS - PM 1P - 100 KVA | 100 | 2358129.09 | 916 | 2574.38 |
| TRANSFORMERS - PM 1P - 150 KVA | 150 | 583737.81 | 175 | 3335.64 |
| TRANSFORMERS - PM 1P - 225 KVA | 225 | 540183.84 | 104 | 5194.08 |
| TRANSFORMERS - PM 1P - 25 KVA | 25 | 2078735.66 | 1992 | 1043.54 |
| TRANSFORMERS - PM 1P - 37.5 KVA | 37.5 | 3499914.69 | 2529 | 1383.91 |
| TRANSFORMERS - PM 1P - 50 KVA | 50 | 6222858.08 | 3536 | 1759.86 |
| TRANSFORMERS - PM 1P - 75 KVA | 75 | 6008078.93 | 2912 | 2063.21 |
| TRANSFORMERS - PM 3P - 1000 KVA | 1000 | 6642706.89 | 236 | 28147.06 |
| TRANSFORMERS - PM 3P - 150 KVA | 150 | 1474889.68 | 244 | 6044.63 |
| TRANSFORMERS - PM 3P - 1500 KVA | 1500 | 2229052.20 | 106 | 21028.79 |
| TRANSFORMERS - PM 3P - 2000 KVA | 2000 | 1608542.18 | 57 | 28220.04 |
| TRANSFORMERS - PM 3P - 225 KVA | 225 | 873694.81 | 107 | 8165.37 |
| TRANSFORMERS - PM 3P - 2500 KVA | 2500 | 1429641.03 | 45 | 31769.80 |
| TRANSFORMERS - PM 3P - 300 KVA | 300 | 3626588.95 | 424 | 8553.28 |
| TRANSFORMERS - PM 3P - 3000 KVA | 3000 | 496323.05 | 12 | 41360.25 |
| TRANSFORMERS - PM 3P - 500 KVA | 500 | 4537659.88 | 315 | 14405.27 |
| TRANSFORMERS - OH 1P - 7.5 KVA | 7.5 | 2397.60 | 1 | 2397.60 |
| TRANSFORMERS - PM 3P - 75 KVA | 75 | 725338.18 | 106 | 6842.81 |
| TRANSFORMERS - PM 3P - 750 KVA | 750 | 4852790.96 | 297 | 16339.36 |
| TRANSFORMERS - OH 1P - 10 KVA | 10 | 83109.37 | 125 | 664.87 |
| TRANSFORMERS - PM 1P - 15 KVA | 15 | 83044.45 | 112 | 741.47 |
| TRANSFORMERS - PM 1P - 167 KVA | 167 | 1404628.80 | 380 | 3696.39 |
| TRANSFORMERS - PM 1P - 250 KVA | 250 | 473303.55 | 65 | 7281.59 |
| TRANSFORMERS - PM 1P - 500 KVA | 500 | 542197.87 | 34 | 15947.00 |

Zero Intercept Analysis
Account 368 - Line Transformers

July 31, 2020

| n | y | x | est y | y*n ^{.5} | n ^{.5} | xn ^{.5} |
|-------|--------|----------|-----------|-------------------|-----------------|------------------|
| 528 | 2,568 | 100.00 | 77,174 | 59013.96953 | 22.98 | 2297.825059 |
| 191 | 533 | 1.00 | 789 | 7365.845491 | 13.82 | 13.82027496 |
| 3,564 | 794 | 15.00 | 11,591 | 47396.27983 | 59.70 | 895.4886934 |
| 64 | 3,736 | 150.00 | 115,753 | 29887.685 | 8.00 | 1200 |
| 327 | 2,716 | 167.00 | 128,869 | 49111.58655 | 18.08 | 3019.8846 |
| 6,546 | 1,007 | 25.00 | 19,307 | 81466.03528 | 80.91 | 2022.683861 |
| 30 | 4,785 | 250.00 | 192,909 | 26210.71892 | 5.48 | 1369.306394 |
| 28 | 976 | 3.00 | 2,332 | 5162.108375 | 5.29 | 15.87450787 |
| 2 | 7,056 | 333.00 | 256,949 | 9979.072734 | 1.41 | 470.9331163 |
| 6,068 | 1,126 | 37.50 | 28,951 | 87705.01254 | 77.90 | 2921.151314 |
| 3,367 | 1,561 | 50.00 | 38,596 | 90600.96713 | 58.03 | 2901.292815 |
| 97 | 3,917 | 500.00 | 385,801 | 38574.25477 | 9.85 | 4924.428901 |
| 1,082 | 1,970 | 75.00 | 57,885 | 64789.314 | 32.89 | 2467.032631 |
| 916 | 2,574 | 100.00 | 77,174 | 77914.77825 | 30.27 | 3026.54919 |
| 175 | 3,336 | 150.00 | 115,753 | 44126.43075 | 13.23 | 1984.313483 |
| 104 | 5,194 | 225.00 | 173,620 | 52969.38348 | 10.20 | 2294.558781 |
| 1,992 | 1,044 | 25.00 | 19,307 | 46575.18614 | 44.63 | 1115.79568 |
| 2,529 | 1,384 | 37.50 | 28,951 | 69595.80201 | 50.29 | 1885.843644 |
| 3,536 | 1,760 | 50.00 | 38,596 | 104648.6833 | 59.46 | 2973.213749 |
| 2,912 | 2,063 | 75.00 | 57,885 | 111337.11 | 53.96 | 4047.221269 |
| 236 | 28,147 | 1,000.00 | 771,584 | 432403.388 | 15.36 | 15362.2915 |
| 244 | 6,045 | 150.00 | 115,753 | 94420.13644 | 15.62 | 2343.074903 |
| 106 | 21,029 | 1,500.00 | 1,157,368 | 216504.6888 | 10.30 | 15443.44521 |
| 57 | 28,220 | 2,000.00 | 1,543,151 | 213056.6165 | 7.55 | 15099.66887 |
| 107 | 8,165 | 225.00 | 173,620 | 84463.26531 | 10.34 | 2327.418097 |
| 45 | 31,770 | 2,500.00 | 1,928,934 | 213118.3018 | 6.71 | 16770.50983 |
| 424 | 8,553 | 300.00 | 231,488 | 176122.7288 | 20.59 | 6177.378085 |
| 12 | 41,360 | 3,000.00 | 2,314,718 | 143276.1233 | 3.46 | 10392.30485 |
| 315 | 14,405 | 500.00 | 385,801 | 255668.1703 | 17.75 | 8874.119675 |
| 1 | 2,398 | 7.50 | 5,804 | 2397.6 | 1.00 | 7.5 |
| 106 | 6,843 | 75.00 | 57,885 | 70451.07197 | 10.30 | 772.1722606 |
| 297 | 16,339 | 750.00 | 578,693 | 281587.4917 | 17.23 | 12925.26595 |
| 125 | 665 | 10.00 | 7,733 | 7433.528035 | 11.18 | 111.8033989 |
| 112 | 741 | 15.00 | 11,591 | 7846.962945 | 10.58 | 158.7450787 |
| 380 | 3,696 | 167.00 | 128,869 | 72055.93708 | 19.49 | 3255.429311 |
| 65 | 7,282 | 250.00 | 192,909 | 58706.0802 | 8.06 | 2015.564437 |
| 34 | 15,947 | 500.00 | 385,801 | 92986.16757 | 5.83 | 2915.475947 |

Exhibit WSS-29

Electric Cost of Service Study Functional Assignment and Classification (Kentucky Utilities)

KENTUCKY UTILITIES COMPANY
 Cost of Service Study
 Functional Assignment and Classification
 12 Months Ended June 30, 2022

Exhibit WSS-29
 Page 1 of 30

LOLP METHODOLOGY

| Description | Name | Functional Vector | Total System | Production Demand | Production Energy | Transmission Demand | Distribution Poles | Distribution Substation | Distribution Primary Lines | | | Distribution Sec. Lines | |
|--|-------|-------------------|------------------|-------------------|-------------------|---------------------|--------------------|-------------------------|----------------------------|----------------|----------------|-------------------------|----------------|
| | | | | LOLP | Energy | Demand | Specific | General | Specific | Demand | Customer | Demand | Customer |
| Plant in Service | | | | | | | | | | | | | |
| Intangible Plant | | | | | | | | | | | | | |
| 301.00 ORGANIZATION | P301 | PT&D | \$ 41,552 | 26,150 | - | 5,660 | - | 1,527 | - | 1,215 | 2,361 | 547 | 1,104 |
| 302.00 FRANCHISE AND CONSENTS | P301 | PT&D | 144,369 | 90,855 | - | 19,667 | - | 5,306 | - | 4,220 | 8,202 | 1,900 | 3,835 |
| 303.00 SOFTWARE | P302 | PT&D | 105,565,478 | 66,435,041 | - | 14,380,841 | - | 3,879,489 | - | 3,085,565 | 5,997,613 | 1,389,074 | 2,804,196 |
| Total Intangible Plant | PINT | | \$ 105,751,399 | \$ 66,552,045 | \$ - | \$ 14,406,168 | \$ - | \$ 3,886,322 | \$ - | \$ 3,090,999 | \$ 6,008,176 | \$ 1,391,520 | \$ 2,809,134 |
| Steam Production Plant | | | | | | | | | | | | | |
| Total Steam Production Plant | PSTPR | F017 | \$ 4,761,764,495 | 4,761,764,495 | - | - | - | - | - | - | - | - | - |
| Hydraulic Production Plant | | | | | | | | | | | | | |
| Total Hydraulic Production Plant | PHDPR | F017 | \$ 45,726,563 | 45,726,563 | - | - | - | - | - | - | - | - | - |
| Other Production Plant | | | | | | | | | | | | | |
| Total Other Production Plant | POTPR | F017 | \$ 1,044,547,033 | 1,044,547,033 | - | - | - | - | - | - | - | - | - |
| Total Production Plant | PPRTL | | \$ 5,852,038,091 | \$ 5,852,038,091 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Transmission | | | | | | | | | | | | | |
| KENTUCKY SYSTEM PROPERTY | P350 | F011 | \$ 1,258,529,222 | - | - | 1,258,529,222 | - | - | - | - | - | - | - |
| VIRGINIA PROPERTY - 500 KV LINE | P352 | F011 | 8,230,429 | - | - | 8,230,429 | - | - | - | - | - | - | - |
| Total Transmission Plant | PTRAN | | \$ 1,266,759,651 | \$ - | \$ - | \$ 1,266,759,651 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Distribution | | | | | | | | | | | | | |
| TOTAL ACCTS 360-362 | P362 | F001 | \$ 341,731,104 | - | - | - | - | 341,731,104 | - | - | - | - | - |
| 364 & 365-OVERHEAD LINES | P365 | F003 | 921,791,437 | - | - | - | - | - | - | 234,148,428 | 416,083,252 | 97,788,669 | 173,771,089 |
| 366 & 367-UNDERGROUND LINES | P367 | F004 | 247,685,955 | - | - | - | - | - | - | 37,648,543 | 112,226,229 | 24,570,169 | 73,241,014 |
| 368-TRANSFORMERS - POWER POOL | P368 | F005 | 5,363,042 | - | - | - | - | - | - | - | - | - | - |
| 368-TRANSFORMERS - ALL OTHER | P368a | F005 | 321,195,483 | - | - | - | - | - | - | - | - | - | - |
| 369-SERVICES | P369 | F006 | 124,944,572 | - | - | - | - | - | - | - | - | - | - |
| 370-METERS | P370 | F007 | 74,150,151 | - | - | - | - | - | - | - | - | - | - |
| 371-CUSTOMER INSTALLATION | P371 | F007 | 159,234 | - | - | - | - | - | - | - | - | - | - |
| 373-STREET LIGHTING | P373 | F008 | 143,087,299 | - | - | - | - | - | - | - | - | - | - |
| Total Distribution Plant | PDIST | | \$ 2,180,108,277 | \$ - | \$ - | \$ - | \$ - | \$ 341,731,104 | \$ - | \$ 271,796,970 | \$ 528,309,481 | \$ 122,358,838 | \$ 247,012,103 |
| Total Prod, Trans, and Dist Plant | PT&D | | \$ 9,298,906,019 | \$ 5,852,038,091 | \$ - | \$ 1,266,759,651 | \$ - | \$ 341,731,104 | \$ - | \$ 271,796,970 | \$ 528,309,481 | \$ 122,358,838 | \$ 247,012,103 |

KENTUCKY UTILITIES COMPANY
 Cost of Service Study
 Functional Assignment and Classification
 12 Months Ended June 30, 2022

LOLP METHODOLOGY

| Description | Name | Functional Vector | Distribution Line Trans. | | Distribution Services | Distribution Meters | Distribution St. & Cust. Lighting | Customer Accounts Expense | Customer Service & Info. | Sales Expense |
|--|-------|-------------------|--------------------------|----------------|-----------------------|---------------------|-----------------------------------|---------------------------|--------------------------|---------------|
| | | | Demand | Customer | Customer | | | | | |
| Plant in Service | | | | | | | | | | |
| Intangible Plant | | | | | | | | | | |
| 301.00 ORGANIZATION | P301 | PT&D | 797 | 662 | 558 | 332 | 639 | - | - | - |
| 302.00 FRANCHISE AND CONSENTS | P301 | PT&D | 2,769 | 2,301 | 1,940 | 1,154 | 2,221 | - | - | - |
| 303.00 SOFTWARE | P302 | PT&D | 2,024,901 | 1,682,342 | 1,418,429 | 843,594 | 1,624,393 | - | - | - |
| Total Intangible Plant | PINT | | \$ 2,028,467 | \$ 1,685,305 | \$ 1,420,927 | \$ 845,080 | \$ 1,627,254 | \$ - | \$ - | \$ - |
| Steam Production Plant | | | | | | | | | | |
| Total Steam Production Plant | PSTPR | F017 | - | - | - | - | - | - | - | - |
| Hydraulic Production Plant | | | | | | | | | | |
| Total Hydraulic Production Plant | PHDPR | F017 | - | - | - | - | - | - | - | - |
| Other Production Plant | | | | | | | | | | |
| Total Other Production Plant | POTPR | F017 | - | - | - | - | - | - | - | - |
| Total Production Plant | PPRTL | | \$ - | \$ - | | | \$ - | \$ - | \$ - | \$ - |
| Transmission | | | | | | | | | | |
| KENTUCKY SYSTEM PROPERTY | P350 | F011 | - | - | - | - | - | - | - | - |
| VIRGINIA PROPERTY - 500 KV LINE | P352 | F011 | - | - | - | - | - | - | - | - |
| Total Transmission Plant | PTRAN | | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Distribution | | | | | | | | | | |
| TOTAL ACCTS 360-362 | P362 | F001 | - | - | - | - | - | - | - | - |
| 364 & 365-OVERHEAD LINES | P365 | F003 | - | - | - | - | - | - | - | - |
| 366 & 367-UNDERGROUND LINES | P367 | F004 | - | - | - | - | - | - | - | - |
| 368-TRANSFORMERS - POWER POOL | P368 | F005 | 2,929,300 | 2,433,742 | - | - | - | - | - | - |
| 368-TRANSFORMERS - ALL OTHER | P368a | F005 | 175,437,375 | 145,758,108 | - | - | - | - | - | - |
| 369-SERVICES | P369 | F006 | - | - | 124,944,572 | - | - | - | - | - |
| 370-METERS | P370 | F007 | - | - | - | 74,150,151 | - | - | - | - |
| 371-CUSTOMER INSTALLATION | P371 | F007 | - | - | - | 159,234 | - | - | - | - |
| 373-STREET LIGHTING | P373 | F008 | - | - | - | - | 143,087,299 | - | - | - |
| Total Distribution Plant | PDIST | | \$ 178,366,675 | \$ 148,191,850 | \$ 124,944,572 | \$ 74,309,385 | \$ 143,087,299 | \$ - | \$ - | \$ - |
| Total Prod, Trans, and Dist Plant | PT&D | | \$ 178,366,675 | \$ 148,191,850 | \$ 124,944,572 | \$ 74,309,385 | \$ 143,087,299 | \$ - | \$ - | \$ - |

KENTUCKY UTILITIES COMPANY
 Cost of Service Study
 Functional Assignment and Classification
 12 Months Ended June 30, 2022

LOLP METHODOLOGY

| Description | Name | Functional Vector | Total System | Production Demand | Production Energy | Transmission Demand | Distribution Poles | Distribution Substation | Distribution Primary Lines | | | Distribution Sec. Lines | |
|---|-------|-------------------|------------------|-------------------|-------------------|---------------------|--------------------|-------------------------|----------------------------|----------------|----------------|-------------------------|----------------|
| | | | | LOLP | Energy | Demand | Specific | General | Specific | Demand | Customer | Demand | Customer |
| Plant in Service (Continued) | | | | | | | | | | | | | |
| General Plant | | | | | | | | | | | | | |
| Total General Plant | PGP | PT&D | \$ 244,918,755 | 154,133,602 | - | 33,364,484 | - | 9,000,667 | - | 7,158,710 | 13,914,852 | 3,222,742 | 6,505,915 |
| TOTAL COMMON PLANT | PCOM | PT&D | \$ - | - | - | - | - | - | - | - | - | - | - |
| 105.00 PLANT HELD FOR FUTURE USE - PRODUCTION | P105 | PPRTL | \$ 290,384 | 290,384 | - | - | - | - | - | - | - | - | - |
| 105.00 PLANT HELD FOR FUTURE USE - DISTRIBUTION | P105 | PDIST | \$ 906,481 | - | - | - | - | 142,091 | - | 113,012 | 219,669 | 50,876 | 102,707 |
| 105.00 PLANT HELD FOR FUTURE USE - GENERAL | P105 | PT&D | \$ - | - | - | - | - | - | - | - | - | - | - |
| OTHER | | PDIST | - | - | - | - | - | - | - | - | - | - | - |
| Total Plant in Service | TPIS | | \$ 9,650,773,038 | \$ 6,073,014,123 | \$ - | \$ 1,314,530,303 | \$ - | \$ 354,760,183 | \$ - | \$ 282,159,692 | \$ 548,452,178 | \$ 127,023,977 | \$ 256,429,859 |
| Construction Work in Progress (CWIP) | | | | | | | | | | | | | |
| CWIP Production | CWIP1 | F017 | \$ 20,992,633 | 20,992,633 | - | - | - | - | - | - | - | - | - |
| CWIP Transmission | CWIP2 | F011 | \$ 78,958,656 | - | - | 78,958,656 | - | - | - | - | - | - | - |
| CWIP Distribution Plant | CWIP3 | PDIST | \$ 26,143,041 | - | - | - | - | 4,097,911 | - | 3,259,287 | 6,335,289 | 1,467,281 | 2,962,077 |
| CWIP General Plant | CWIP4 | PT&D | \$ 29,729,390 | 18,709,461 | - | 4,049,938 | - | 1,092,543 | - | 868,958 | 1,689,050 | 391,192 | 789,719 |
| RWIP | CWIP5 | F004 | \$ - | - | - | - | - | - | - | - | - | - | - |
| Total Construction Work in Progress | TCWIP | | \$ 155,823,720 | \$ 39,702,094 | \$ - | \$ 83,008,594 | \$ - | \$ 5,190,455 | \$ - | \$ 4,128,245 | \$ 8,024,339 | \$ 1,858,473 | \$ 3,751,795 |
| Total Utility Plant | | | \$ 9,806,596,758 | \$ 6,112,716,217 | \$ - | \$ 1,397,538,897 | \$ - | \$ 359,950,638 | \$ - | \$ 286,287,937 | \$ 556,476,517 | \$ 128,882,450 | \$ 260,181,655 |

KENTUCKY UTILITIES COMPANY
 Cost of Service Study
 Functional Assignment and Classification
 12 Months Ended June 30, 2022

LOLP METHODOLOGY

| Description | Name | Functional Vector | Distribution Line Trans. | | Distribution Services | Distribution Meters | Distribution St. & Cust. Lighting | Customer Accounts Expense | Customer Service & Info. | Sales Expense |
|---|-------|-------------------|--------------------------|----------------|-----------------------|---------------------|-----------------------------------|---------------------------|--------------------------|---------------|
| | | | Demand | Customer | Customer | | | | | |
| Plant in Service (Continued) | | | | | | | | | | |
| General Plant | | | | | | | | | | |
| Total General Plant | PGP | PT&D | 4,697,901 | 3,903,143 | 3,290,846 | 1,957,194 | 3,768,697 | - | - | - |
| TOTAL COMMON PLANT | PCOM | PT&D | - | - | - | - | - | - | - | - |
| 105.00 PLANT HELD FOR FUTURE USE - PRODUCTION | P105 | PPRTL | - | - | - | - | - | - | - | - |
| 105.00 PLANT HELD FOR FUTURE USE - DISTRIBUTION | P105 | PDIST | 74,164 | 61,618 | 51,951 | 30,898 | 59,495 | - | - | - |
| 105.00 PLANT HELD FOR FUTURE USE - GENERAL | P105 | PT&D | - | - | - | - | - | - | - | - |
| OTHER | | PDIST | - | - | - | - | - | - | - | - |
| Total Plant in Service | TPIS | | \$ 185,167,208 | \$ 153,841,916 | \$ 129,708,296 | \$ 77,142,557 | \$ 148,542,746 | \$ - | \$ - | \$ - |
| Construction Work in Progress (CWIP) | | | | | | | | | | |
| CWIP Production | CWIP1 | F017 | - | - | - | - | - | - | - | - |
| CWIP Transmission | CWIP2 | F011 | - | - | - | - | - | - | - | - |
| CWIP Distribution Plant | CWIP3 | PDIST | 2,138,906 | 1,777,061 | 1,498,288 | 891,090 | 1,715,849 | - | - | - |
| CWIP General Plant | CWIP4 | PT&D | 570,253 | 473,782 | 399,458 | 237,573 | 457,462 | - | - | - |
| RWIP | CWIP5 | F004 | - | - | - | - | - | - | - | - |
| Total Construction Work in Progress | TCWIP | | \$ 2,709,160 | \$ 2,250,843 | \$ 1,897,747 | \$ 1,128,664 | \$ 2,173,311 | \$ - | \$ - | \$ - |
| Total Utility Plant | | | \$ 187,876,368 | \$ 156,092,759 | \$ 131,606,043 | \$ 78,271,220 | \$ 150,716,057 | \$ - | \$ - | \$ - |

KENTUCKY UTILITIES COMPANY
Cost of Service Study
Functional Assignment and Classification
12 Months Ended June 30, 2022

Exhibit WSS-29
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LOLP METHODOLOGY

| Description | Name | Functional Vector | Total System | Production Demand | Production Energy | Transmission Demand | Distribution Poles | Distribution Substation | Distribution Primary Lines | | | Distribution Sec. Lines | |
|---|----------|-------------------|------------------|-------------------|-------------------|---------------------|--------------------|-------------------------|----------------------------|----------------|----------------|-------------------------|----------------|
| | | | | LOLP | Energy | Demand | Specific | General | Specific | Demand | Customer | Demand | Customer |
| Rate Base | | | | | | | | | | | | | |
| Utility Plant | | | | | | | | | | | | | |
| Plant in Service | | | \$ 9,650,773,038 | \$ 6,073,014,123 | \$ - | \$ 1,314,530,303 | \$ - | \$ 354,760,183 | \$ - | \$ 282,159,692 | \$ 548,452,178 | \$ 127,023,977 | \$ 256,429,859 |
| Construction Work in Progress (CWIP) | | | 155,823,720 | 39,702,094.34 | - | 83,008,593.88 | - | 5,190,454.54 | - | 4,128,245.29 | 8,024,339.34 | 1,858,472.87 | 3,751,795.13 |
| Total Utility Plant | TUP | | \$ 9,806,596,758 | \$ 6,112,716,217 | \$ - | \$ 1,397,538,897 | \$ - | \$ 359,950,638 | \$ - | \$ 286,287,937 | \$ 556,476,517 | \$ 128,882,450 | \$ 260,181,655 |
| Less: Accumulated Provision for Depreciation | | | | | | | | | | | | | |
| Steam Production | ADEPREPA | F017 | \$ 1,910,902,169 | 1,910,902,169 | - | - | - | - | - | - | - | - | - |
| Hydraulic Production | RWIP | F017 | 16,663,604 | 16,663,604 | - | - | - | - | - | - | - | - | - |
| Other Production | | F017 | 425,504,289 | 425,504,289 | - | - | - | - | - | - | - | - | - |
| Transmission - Kentucky System Property | ADEPRTP | PTRAN | 340,091,705 | - | - | 340,091,705 | - | - | - | - | - | - | - |
| Transmission - Virginia Property | ADEPRD1 | PTRAN | 2,567,091 | - | - | 2,567,091 | - | - | - | - | - | - | - |
| Transmission - FERC | ADEPRD10 | PTRAN | 755,524 | - | - | 755,524 | - | - | - | - | - | - | - |
| Distribution | ADEPRD11 | PDIST | 692,590,515 | - | - | - | 108,563,287 | - | 86,346,172 | 167,836,680 | 38,871,726 | 78,472,359 | |
| General Plant | ADEPRD12 | PT&D | 77,429,701 | 48,728,480 | - | 10,547,996 | - | 2,845,511 | - | 2,263,186 | 4,399,103 | 1,018,852 | 2,056,809 |
| Intangible Plant | ADEPRGP | PT&D | 49,083,879 | 30,889,734 | - | 6,686,537 | - | 1,803,813 | - | 1,434,669 | 2,788,659 | 645,866 | 1,303,843 |
| Total Accumulated Depreciation | TADEPR | | \$ 3,515,588,477 | \$ 2,432,688,276 | \$ - | \$ 360,648,853 | \$ - | \$ 113,212,611 | \$ - | \$ 90,044,027 | \$ 175,024,442 | \$ 40,536,443 | \$ 81,833,011 |
| Net Utility Plant | NTPANT | | \$ 6,291,008,281 | \$ 3,680,027,941 | \$ - | \$ 1,036,890,044 | \$ - | \$ 246,738,027 | \$ - | \$ 196,243,910 | \$ 381,452,075 | \$ 88,346,006 | \$ 178,348,644 |
| Working Capital | | | | | | | | | | | | | |
| Cash Working Capital - Operation and Maintenance Expenses | CWC | OMLPP | \$ 130,078,093 | 19,058,566 | 79,624,711 | 8,904,127 | - | 1,431,095 | - | 1,998,528 | 3,667,849 | 857,386 | 1,599,580 |
| Materials and Supplies | M&S | TPIS | 59,890,781 | 37,687,920 | - | 8,157,714 | - | 2,201,571 | - | 1,751,027 | 3,403,585 | 788,286 | 1,591,353 |
| Prepayments | PREPAY | TPIS | 19,024,116 | 11,971,448 | - | 2,591,272 | - | 699,322 | - | 556,208 | 1,081,138 | 250,396 | 505,488 |
| Fuel Stock | | F017 | 62,536,188 | 62,536,188 | - | - | - | - | - | - | - | - | - |
| Total Working Capital | TWC | | \$ 271,529,178 | \$ 131,254,122 | \$ 79,624,711 | \$ 19,653,112 | \$ - | \$ 4,331,988 | \$ - | \$ 4,305,763 | \$ 8,152,572 | \$ 1,896,068 | \$ 3,696,420 |
| Emission Allowance | EMALL | PROFIX | - | - | - | - | - | - | - | - | - | - | - |
| Deferred Debits | | | | | | | | | | | | | |
| Service Pension Cost | PENSCOST | TLB | \$ - | - | - | - | - | - | - | - | - | - | - |
| Accumulated Deferred Income Tax | | | | | | | | | | | | | |
| Total Production Plant | ADITPP | F017 | 732,330,105 | 732,330,105 | - | - | - | - | - | - | - | - | - |
| Total Transmission Plant | ADITTP | F011 | 198,625,100 | - | - | 198,625,100 | - | - | - | - | - | - | - |
| Total Distribution Plant | ADITDP | PDIST | 315,220,930 | - | - | - | 49,410,755 | - | 39,299,009 | 76,388,043 | 17,691,812 | 35,715,375 | |
| Total General Plant | ADITGP | PT&D | 35,890,099 | 22,586,552 | - | 4,889,191 | - | 1,318,947 | - | 1,049,029 | 2,039,066 | 472,257 | 953,369 |
| Total Accumulated Deferred Income Tax | ADITT | | 1,282,066,235 | 754,916,658 | - | 203,514,291 | - | 50,729,702 | - | 40,348,037 | 78,427,109 | 18,164,069 | 36,668,744 |
| Accumulated Deferred Investment Tax Credits | | | | | | | | | | | | | |
| Production | ADITCP | F017 | \$ 80,926,985 | 80,926,985 | - | - | - | - | - | - | - | - | - |
| Transmission | ADITCT | F011 | - | - | - | - | - | - | - | - | - | - | - |
| Transmission VA | ADITCTVA | F011 | - | - | - | - | - | - | - | - | - | - | - |
| Distribution VA | ADITCDVA | PDIST | - | - | - | - | - | - | - | - | - | - | - |
| Distribution Plant KY,FERC & TN | ADITCDKY | PDIST | - | - | - | - | - | - | - | - | - | - | - |
| General | ADITCG | PT&D | - | - | - | - | - | - | - | - | - | - | - |
| Total Accum. Deferred Investment Tax Credits | ADITCTL | | 80,926,985 | 80,926,985 | - | - | - | - | - | - | - | - | - |
| Total Deferred Debits | | | \$ 1,362,993,220 | \$ 835,843,643 | \$ - | \$ 203,514,291 | \$ - | \$ 50,729,702 | \$ - | \$ 40,348,037 | \$ 78,427,109 | \$ 18,164,069 | \$ 36,668,744 |
| Less: Customer Advances | CSTDEP | F027 | \$ 1,712,216 | - | - | - | - | - | - | 397,934 | 773,491 | 179,144 | 361,647 |
| Less: Asset Retirement Obligations | | F017 | - | - | - | - | - | - | - | - | - | - | - |
| Net Rate Base | RB | | \$ 5,197,832,023 | \$ 2,975,438,420 | \$ 79,624,711 | \$ 853,028,865 | \$ - | \$ 200,340,313 | \$ - | \$ 159,803,702 | \$ 310,404,048 | \$ 71,898,861 | \$ 145,014,673 |

KENTUCKY UTILITIES COMPANY
Cost of Service Study
Functional Assignment and Classification
12 Months Ended June 30, 2022

LOLP METHODOLOGY

| Description | Name | Functional Vector | Distribution Line Trans. | | Distribution Services | Distribution Meters | Distribution St. & Cust. Lighting | Customer Accounts Expense | Customer Service & Info. | Sales Expense |
|---|----------|-------------------|--------------------------|----------------|-----------------------|---------------------|-----------------------------------|---------------------------|--------------------------|---------------|
| | | | Demand | Customer | Customer | | | | | |
| Rate Base | | | | | | | | | | |
| Utility Plant | | | | | | | | | | |
| Plant in Service | | | \$ 185,167,208 | \$ 153,841,916 | \$ 129,708,296 | \$ 77,142,557 | \$ 148,542,746 | \$ - | \$ - | \$ - |
| Construction Work in Progress (CWIP) | | | 2,709,159.65 | 2,250,842.99 | 1,897,746.84 | 1,128,663.68 | 2,173,311.45 | - | - | - |
| Total Utility Plant | TUP | | \$ 187,876,368 | \$ 156,092,759 | \$ 131,606,043 | \$ 78,271,220 | \$ 150,716,057 | \$ - | \$ - | \$ - |
| Less: Accumulated Provision for Depreciation | | | | | | | | | | |
| Steam Production | ADEPREPA | F017 | - | - | - | - | - | - | - | - |
| Hydraulic Production | RWIP | F017 | - | - | - | - | - | - | - | - |
| Other Production | | F017 | - | - | - | - | - | - | - | - |
| Transmission - Kentucky System Property | ADEPRTP | PTRAN | - | - | - | - | - | - | - | - |
| Transmission - Virginia Property | ADEPRD1 | PTRAN | - | - | - | - | - | - | - | - |
| Transmission - FERC | ADEPRD10 | PTRAN | - | - | - | - | - | - | - | - |
| Distribution | ADEPRD11 | PDIST | 56,664,648 | 47,078,519 | 39,693,178 | 23,607,073 | 45,456,873 | - | - | - |
| General Plant | ADEPRD12 | PT&D | 1,485,215 | 1,233,957 | 1,040,383 | 618,756 | 1,191,453 | - | - | - |
| Intangible Plant | ADEPRGP | PT&D | 941,501 | 782,224 | 659,515 | 392,239 | 755,280 | - | - | - |
| Total Accumulated Depreciation | TADEPR | | \$ 59,091,364 | \$ 49,094,701 | \$ 41,393,075 | \$ 24,618,068 | \$ 47,403,606 | \$ - | \$ - | \$ - |
| Net Utility Plant | NTPLANT | | \$ 128,785,004 | \$ 106,998,058 | \$ 90,212,968 | \$ 53,653,152 | \$ 103,312,451 | \$ - | \$ - | \$ - |
| Working Capital | | | | | | | | | | |
| Cash Working Capital - Operation and Maintenance Expenses | CWC | OMLPP | 408,278 | 339,209 | 279,717 | 1,778,647 | 320,334 | 8,704,114 | 1,105,953 | - |
| Materials and Supplies | M&S | TPIS | 1,149,111 | 954,712 | 804,944 | 478,731 | 921,827 | - | - | - |
| Prepayments | PREPAY | TPIS | 365,011 | 303,261 | 255,688 | 152,068 | 292,815 | - | - | - |
| Fuel Stock | | F017 | - | - | - | - | - | - | - | - |
| Total Working Capital | TWC | | \$ 1,922,401 | \$ 1,597,182 | \$ 1,340,349 | \$ 2,409,446 | \$ 1,534,976 | \$ 8,704,114 | \$ 1,105,953 | \$ - |
| Emission Allowance | EMALL | PROFIX | - | - | - | - | - | - | - | - |
| Deferred Debits | | | | | | | | | | |
| Service Pension Cost | PENSCOST | TLB | - | - | - | - | - | - | - | - |
| Accumulated Deferred Income Tax | | | | | | | | | | |
| Total Production Plant | ADITPP | F017 | - | - | - | - | - | - | - | - |
| Total Transmission Plant | ADITTP | F011 | - | - | - | - | - | - | - | - |
| Total Distribution Plant | ADITDP | PDIST | 25,789,962 | 21,426,997 | 18,065,683 | 10,744,362 | 20,688,932 | - | - | - |
| Total General Plant | ADITGP | PT&D | 688,425 | 571,962 | 482,237 | 286,805 | 552,260 | - | - | - |
| Total Accumulated Deferred Income Tax | ADITT | | 26,478,387 | 21,998,959 | 18,547,919 | 11,031,167 | 21,241,192 | - | - | - |
| Accumulated Deferred Investment Tax Credits | | | | | | | | | | |
| Production | ADITCP | F017 | - | - | - | - | - | - | - | - |
| Transmission | ADITCT | F011 | - | - | - | - | - | - | - | - |
| Transmission VA | ADITCTVA | F011 | - | - | - | - | - | - | - | - |
| Distribution VA | ADITCDVA | PDIST | - | - | - | - | - | - | - | - |
| Distribution Plant KY,FERC & TN | ADITCDKY | PDIST | - | - | - | - | - | - | - | - |
| General | ADITCG | PT&D | - | - | - | - | - | - | - | - |
| Total Accum. Deferred Investment Tax Credits | ADITCTL | | - | - | - | - | - | - | - | - |
| Total Deferred Debits | | | \$ 26,478,387 | \$ 21,998,959 | \$ 18,547,919 | \$ 11,031,167 | \$ 21,241,192 | \$ - | \$ - | \$ - |
| Less: Customer Advances | CSTDEP | F027 | - | - | - | - | - | - | - | - |
| Less: Asset Retirement Obligations | | F017 | - | - | - | - | - | - | - | - |
| Net Rate Base | RB | | \$ 104,229,018 | \$ 86,596,282 | \$ 73,005,398 | \$ 45,031,431 | \$ 83,606,234 | \$ 8,704,114 | \$ 1,105,953 | \$ - |

KENTUCKY UTILITIES COMPANY
 Cost of Service Study
 Functional Assignment and Classification
 12 Months Ended June 30, 2022

LOLP METHODOLOGY

| Description | Name | Functional Vector | Total System | Production Demand | Production Energy | Transmission Demand | Distribution Poles | Distribution Substation | Distribution Primary Lines | | | Distribution Sec. Lines | | |
|---|-------------|-------------------|----------------------|-------------------|-------------------|----------------------|--------------------|-------------------------|----------------------------|---------------------|---------------------|-------------------------|---------------------|-------------|
| | | | | LOLP | Energy | Demand | Specific | General | Specific | Demand | Customer | Demand | Customer | |
| Operation and Maintenance Expenses (Continued) | | | | | | | | | | | | | | |
| Transmission Expenses | | | | | | | | | | | | | | |
| 560 OPERATION SUPERVISION AND ENG | OM560 | LBTRAN | \$ 1,854,542 | - | - | 1,854,542 | - | - | - | - | - | - | - | - |
| 561 LOAD DISPATCHING | OM561 | LBTRAN | 4,510,239 | - | - | 4,510,239 | - | - | - | - | - | - | - | - |
| 562 STATION EXPENSES | OM562 | LBTRAN | 1,170,142 | - | - | 1,170,142 | - | - | - | - | - | - | - | - |
| 563 OVERHEAD LINE EXPENSES | OM563 | LBTRAN | 1,105,850 | - | - | 1,105,850 | - | - | - | - | - | - | - | - |
| 565 TRANSMISSION OF ELECTRICITY BY OTHERS | OM565 | LBTRAN | 2,766,380 | - | - | 2,766,380 | - | - | - | - | - | - | - | - |
| 566 MISC. TRANSMISSION EXPENSES | OM566 | PTRAN | 24,246,266 | - | - | 24,246,266 | - | - | - | - | - | - | - | - |
| 567 RENTS | OM567 | PTRAN | 169,306 | - | - | 169,306 | - | - | - | - | - | - | - | - |
| 568 MAINTENACE SUPERVISION AND ENG | OM568 | LBTRAN | - | - | - | - | - | - | - | - | - | - | - | - |
| 569 STRUCTURES | OM569 | LBTRAN | - | - | - | - | - | - | - | - | - | - | - | - |
| 570 MAINT OF STATION EQUIPMENT | OM570 | LBTRAN | 1,969,589 | - | - | 1,969,589 | - | - | - | - | - | - | - | - |
| 571 MAINT OF OVERHEAD LINES | OM571 | LBTRAN | 10,707,630 | - | - | 10,707,630 | - | - | - | - | - | - | - | - |
| 572 UNDERGROUND LINES | OM572 | LBTRAN | - | - | - | - | - | - | - | - | - | - | - | - |
| 573 MISC PLANT | OM573 | PTRAN | 217,390 | - | - | 217,390 | - | - | - | - | - | - | - | - |
| 575 MISO DAY 1&2 EXPENSE | OM575 | PTRAN | - | - | - | - | - | - | - | - | - | - | - | - |
| Total Transmission Expenses | | | \$ 48,717,334 | \$ - | \$ - | \$ 48,717,334 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Distribution Operation Expense | | | | | | | | | | | | | | |
| 580 OPERATION SUPERVISION AND ENGI | OM580 | LBDO | \$ 1,911,255 | - | - | - | - | 297,680 | - | 175,895 | 322,940 | 75,485 | 140,907 | - |
| 581 LOAD DISPATCHING | OM581 | P362 | 438,256 | - | - | - | - | 438,256 | - | - | - | - | - | - |
| 582 STATION EXPENSES | OM582 | P362 | 2,231,084 | - | - | - | - | 2,231,084 | - | - | - | - | - | - |
| 583 OVERHEAD LINE EXPENSES | OM583 | P365 | 6,598,429 | - | - | - | - | - | - | 1,676,097 | 2,978,435 | 699,997 | 1,243,900 | |
| 584 UNDERGROUND LINE EXPENSES | OM584 | P367 | 41,724 | - | - | - | - | - | - | 6,342 | 18,905 | 4,139 | 12,338 | |
| 585 STREET LIGHTING EXPENSE | OM585 | P373 | - | - | - | - | - | - | - | - | - | - | - | |
| 586 METER EXPENSES | OM586 | P370 | 9,700,980 | - | - | - | - | - | - | - | - | - | - | |
| 586 METER EXPENSES - LOAD MANAGEMENT | OM586x | F012 | - | - | - | - | - | - | - | - | - | - | - | |
| 587 CUSTOMER INSTALLATIONS EXPENSE | OM587 | P371 | - | - | - | - | - | - | - | - | - | - | - | |
| 588 MISCELLANEOUS DISTRIBUTION EXP | OM588 | PDIST | 8,491,579 | - | - | - | - | 1,331,052 | - | 1,058,656 | 2,057,779 | 476,591 | 962,119 | |
| 588 MISC DISTR EXP -- MAPPIN | OM588x | PDIST | - | - | - | - | - | - | - | - | - | - | - | |
| 589 RENTS | OM589 | PDIST | - | - | - | - | - | - | - | - | - | - | - | |
| Total Distribution Operation Expense | OMDO | | \$ 29,413,307 | \$ - | \$ - | \$ - | \$ - | \$ 4,298,072 | \$ - | \$ 2,916,990 | \$ 5,378,059 | \$ 1,256,212 | \$ 2,359,263 | |

KENTUCKY UTILITIES COMPANY
 Cost of Service Study
 Functional Assignment and Classification
 12 Months Ended June 30, 2022

LOLP METHODOLOGY

| Description | Name | Functional Vector | Distribution Line Trans. | | Distribution Services | Distribution Meters | Distribution St. & Cust. Lighting | Customer Accounts Expense | Customer Service & Info. | Sales Expense |
|---|--------|-------------------|--------------------------|------------|-----------------------|---------------------|-----------------------------------|---------------------------|--------------------------|---------------|
| | | | Demand | Customer | Customer | | | | | |
| Operation and Maintenance Expenses (Continued) | | | | | | | | | | |
| Transmission Expenses | | | | | | | | | | |
| 560 OPERATION SUPERVISION AND ENG | OM560 | LBTRAN | - | - | - | - | - | - | - | - |
| 561 LOAD DISPATCHING | OM561 | LBTRAN | - | - | - | - | - | - | - | - |
| 562 STATION EXPENSES | OM562 | LBTRAN | - | - | - | - | - | - | - | - |
| 563 OVERHEAD LINE EXPENSES | OM563 | LBTRAN | - | - | - | - | - | - | - | - |
| 565 TRANSMISSION OF ELECTRICITY BY OTHERS | OM565 | LBTRAN | - | - | - | - | - | - | - | - |
| 566 MISC. TRANSMISSION EXPENSES | OM566 | PTRAN | - | - | - | - | - | - | - | - |
| 567 RENTS | OM567 | PTRAN | - | - | - | - | - | - | - | - |
| 568 MAINTENACE SUPERVISION AND ENG | OM568 | LBTRAN | - | - | - | - | - | - | - | - |
| 569 STRUCTURES | OM569 | LBTRAN | - | - | - | - | - | - | - | - |
| 570 MAINT OF STATION EQUIPMENT | OM570 | LBTRAN | - | - | - | - | - | - | - | - |
| 571 MAINT OF OVERHEAD LINES | OM571 | LBTRAN | - | - | - | - | - | - | - | - |
| 572 UNDERGROUND LINES | OM572 | LBTRAN | - | - | - | - | - | - | - | - |
| 573 MISC PLANT | OM573 | PTRAN | - | - | - | - | - | - | - | - |
| 575 MISO DAY 1&2 EXPENSE | OM575 | PTRAN | - | - | - | - | - | - | - | - |
| Total Transmission Expenses | | | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Distribution Operation Expense | | | | | | | | | | |
| 580 OPERATION SUPERVISION AND ENGI | OM580 | LBDO | 37,666 | 31,294 | 26,385 | 772,788 | 30,216 | - | - | - |
| 581 LOAD DISPATCHING | OM581 | P362 | - | - | - | - | - | - | - | - |
| 582 STATION EXPENSES | OM582 | P362 | - | - | - | - | - | - | - | - |
| 583 OVERHEAD LINE EXPENSES | OM583 | P365 | - | - | - | - | - | - | - | - |
| 584 UNDERGROUND LINE EXPENSES | OM584 | P367 | - | - | - | - | - | - | - | - |
| 585 STREET LIGHTING EXPENSE | OM585 | P373 | - | - | - | - | - | - | - | - |
| 586 METER EXPENSES | OM586 | P370 | - | - | - | 9,700,980 | - | - | - | - |
| 586 METER EXPENSES - LOAD MANAGEMENT | OM586x | F012 | - | - | - | - | - | - | - | - |
| 587 CUSTOMER INSTALLATIONS EXPENSE | OM587 | P371 | - | - | - | - | - | - | - | - |
| 588 MISCELLANEOUS DISTRIBUTION EXP | OM588 | PDIST | 694,743 | 577,211 | 486,662 | 289,437 | 557,329 | - | - | - |
| 588 MISC DISTR EXP -- MAPPIN | OM588x | PDIST | - | - | - | - | - | - | - | - |
| 589 RENTS | OM589 | PDIST | - | - | - | - | - | - | - | - |
| Total Distribution Operation Expense | OMDO | | \$ 732,409 | \$ 608,505 | \$ 513,047 | \$ 10,763,205 | \$ 587,545 | \$ - | \$ - | \$ - |

KENTUCKY UTILITIES COMPANY
 Cost of Service Study
 Functional Assignment and Classification
 12 Months Ended June 30, 2022

LOLP METHODOLOGY

| Description | Name | Functional Vector | Total System | Production Demand | Production Energy | Transmission Demand | Distribution Poles | Distribution Substation | Distribution Primary Lines | | | Distribution Sec. Lines | |
|---|--------|-------------------|----------------|-------------------|-------------------|---------------------|--------------------|-------------------------|----------------------------|---------------|---------------|-------------------------|--------------|
| | | | | LOLP | Energy | Demand | Specific | General | Specific | Demand | Customer | Demand | Customer |
| Operation and Maintenance Expenses (Continued) | | | | | | | | | | | | | |
| Distribution Maintenance Expense | | | | | | | | | | | | | |
| 590 MAINTENANCE SUPERVISION AND EN | OM590 | LBDM | \$ 50,915 | - | - | - | - | 4,280 | - | 11,576 | 20,884 | 4,896 | 8,904 |
| 591 STRUCTURES | OM591 | P362 | - | - | - | - | - | - | - | - | - | - | - |
| 592 MAINTENANCE OF STATION EQUIPME | OM592 | P362 | 1,421,212 | - | - | - | - | 1,421,212 | - | - | - | - | - |
| 593 MAINTENANCE OF OVERHEAD LINES | OM593 | P365 | 28,071,515 | - | - | - | - | - | - | 7,130,573 | 12,671,074 | 2,977,980 | 5,291,889 |
| 594 MAINTENANCE OF UNDERGROUND LIN | OM594 | P367 | 483,282 | - | - | - | - | - | - | 73,459 | 218,975 | 47,941 | 142,907 |
| 595 MAINTENANCE OF LINE TRANSFORME | OM595 | P368 | 106,084 | - | - | - | - | - | - | - | - | - | - |
| 596 MAINTENANCE OF ST LIGHTS & SIG SYSTEMS | OM596 | P373 | - | - | - | - | - | - | - | - | - | - | - |
| 597 MAINTENANCE OF METERS | OM597 | P370 | 28 | - | - | - | - | - | - | - | - | - | - |
| 598 MISCELLANEOUS DISTRIBUTION EXPENSES | OM598 | PDIST | 584,150 | - | - | - | - | 91,565 | - | 72,827 | 141,558 | 32,785 | 66,186 |
| Total Distribution Maintenance Expense | OMDM | | \$ 30,717,186 | \$ - | \$ - | \$ - | \$ - | \$ 1,517,057 | \$ - | \$ 7,288,435 | \$ 13,052,491 | \$ 3,063,602 | \$ 5,509,886 |
| Total Distribution Operation and Maintenance Expenses | | | 60,130,493 | - | - | - | - | 5,815,129 | - | 10,205,425 | 18,430,550 | 4,319,814 | 7,869,149 |
| Transmission and Distribution Expenses | | | 108,847,827 | - | - | 48,717,334 | - | 5,815,129 | - | 10,205,425 | 18,430,550 | 4,319,814 | 7,869,149 |
| Production, Transmission and Distribution Expenses | OMSUB | | \$ 734,291,073 | \$ 92,041,415 | \$ 533,401,831 | \$ 48,717,334 | \$ - | \$ 5,815,129 | \$ - | \$ 10,205,425 | \$ 18,430,550 | \$ 4,319,814 | \$ 7,869,149 |
| Customer Accounts Expense | | | | | | | | | | | | | |
| 901 SUPERVISION/CUSTOMER ACCTS | OM901 | F025 | \$ 4,235,757 | - | - | - | - | - | - | - | - | - | - |
| 902 METER READING EXPENSES | OM902 | F025 | 9,902,132 | - | - | - | - | - | - | - | - | - | - |
| 903 RECORDS AND COLLECTION | OM903 | F025 | 21,487,653 | - | - | - | - | - | - | - | - | - | - |
| 904 UNCOLLECTIBLE ACCOUNTS | OM904 | F025 | 4,646,049 | - | - | - | - | - | - | - | - | - | - |
| 905 MISC CUST ACCOUNTS | OM903 | F025 | 165,801 | - | - | - | - | - | - | - | - | - | - |
| Total Customer Accounts Expense | OMCA | | \$ 40,437,392 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Customer Service Expense | | | | | | | | | | | | | |
| 907 SUPERVISION | OM907 | F026 | \$ 368,993 | - | - | - | - | - | - | - | - | - | - |
| 908 CUSTOMER ASSISTANCE EXPENSES | OM908 | F026 | 1,252,447 | - | - | - | - | - | - | - | - | - | - |
| 908 CUSTOMER ASSISTANCE EXP-INCENTIVES | OM908x | F026 | - | - | - | - | - | - | - | - | - | - | - |
| 909 INFORMATIONAL AND INSTRUCTIONA | OM909 | F026 | 1,698,677 | - | - | - | - | - | - | - | - | - | - |
| 909 INFORM AND INSTRUC -LOAD MGMT | OM909x | F026 | - | - | - | - | - | - | - | - | - | - | - |
| 910 MISCELLANEOUS CUSTOMER SERVICE | OM910 | F026 | 1,818,935 | - | - | - | - | - | - | - | - | - | - |
| 911 DEMONSTRATION AND SELLING EXP | OM911 | F026 | - | - | - | - | - | - | - | - | - | - | - |
| 912 DEMONSTRATION AND SELLING EXP | OM912 | F026 | 121,604 | - | - | - | - | - | - | - | - | - | - |
| 913 ADVERTISING EXPENSES | OM913 | F026 | - | - | - | - | - | - | - | - | - | - | - |
| 916 MISC SALES EXPENSE | OM916 | F026 | - | - | - | - | - | - | - | - | - | - | - |
| Total Customer Service Expense | OMCS | | \$ 5,260,656 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Sub-Total Prod, Trans, Dist, Cust Acct and Cust Service | OMSUB2 | | 779,989,121 | 92,041,415 | 533,401,831 | 48,717,334 | - | 5,815,129 | - | 10,205,425 | 18,430,550 | 4,319,814 | 7,869,149 |

KENTUCKY UTILITIES COMPANY
 Cost of Service Study
 Functional Assignment and Classification
 12 Months Ended June 30, 2022

LOLP METHODOLOGY

| Description | Name | Functional Vector | Distribution Line Trans. | | Distribution Services | Distribution Meters | Distribution St. & Cust. Lighting | Customer Accounts Expense | Customer Service & Info. | Sales Expense |
|---|--------|-------------------|--------------------------|------------|-----------------------|---------------------|-----------------------------------|---------------------------|--------------------------|---------------|
| | | | Demand | Customer | Customer | | | | | |
| Operation and Maintenance Expenses (Continued) | | | | | | | | | | |
| Distribution Maintenance Expense | | | | | | | | | | |
| 590 MAINTENANCE SUPERVISION AND EN STRUCTURES | OM590 | LBDM | 202 | 168 | 1 | 1 | 2 | - | - | - |
| 591 MAINTENANCE OF STATION EQUIPME | OM591 | P362 | - | - | - | - | - | - | - | - |
| 592 MAINTENANCE OF OVERHEAD LINES | OM592 | P362 | - | - | - | - | - | - | - | - |
| 593 MAINTENANCE OF UNDERGROUND LIN | OM593 | P365 | - | - | - | - | - | - | - | - |
| 594 MAINTENANCE OF LINE TRANSFORME | OM594 | P367 | - | - | - | - | - | - | - | - |
| 595 MAINTENANCE OF ST LIGHTS & SIG SYSTEMS | OM595 | P368 | 57,943 | 48,141 | - | - | - | - | - | - |
| 596 MAINTENANCE OF METERS | OM596 | P373 | - | - | - | - | - | - | - | - |
| 597 MAINTENANCE OF METERS | OM597 | P370 | - | - | - | 28 | - | - | - | - |
| 598 MISCELLANEOUS DISTRIBUTION EXPENSES | OM598 | PDIST | 47,793 | 39,707 | 33,478 | 19,911 | 38,340 | - | - | - |
| Total Distribution Maintenance Expense | OMDM | | \$ 105,938 | \$ 88,016 | \$ 33,480 | \$ 19,940 | \$ 38,341 | \$ - | \$ - | \$ - |
| Total Distribution Operation and Maintenance Expenses | | | 838,347 | 696,521 | 546,527 | 10,783,145 | 625,886 | - | - | - |
| Transmission and Distribution Expenses | | | 838,347 | 696,521 | 546,527 | 10,783,145 | 625,886 | - | - | - |
| Production, Transmission and Distribution Expenses | OMSUB | | \$ 838,347 | \$ 696,521 | \$ 546,527 | \$ 10,783,145 | \$ 625,886 | \$ - | \$ - | \$ - |
| Customer Accounts Expense | | | | | | | | | | |
| 901 SUPERVISION/CUSTOMER ACCTS | OM901 | F025 | - | - | - | - | - | 4,235,757 | - | - |
| 902 METER READING EXPENSES | OM902 | F025 | - | - | - | - | - | 9,902,132 | - | - |
| 903 RECORDS AND COLLECTION | OM903 | F025 | - | - | - | - | - | 21,487,653 | - | - |
| 904 UNCOLLECTIBLE ACCOUNTS | OM904 | F025 | - | - | - | - | - | 4,646,049 | - | - |
| 905 MISC CUST ACCOUNTS | OM903 | F025 | - | - | - | - | - | 165,801 | - | - |
| Total Customer Accounts Expense | OMCA | | \$ - | \$ - | \$ - | \$ - | \$ - | \$ 40,437,392 | \$ - | \$ - |
| Customer Service Expense | | | | | | | | | | |
| 907 SUPERVISION | OM907 | F026 | - | - | - | - | - | - | 368,993 | - |
| 908 CUSTOMER ASSISTANCE EXPENSES | OM908 | F026 | - | - | - | - | - | - | 1,252,447 | - |
| 908 CUSTOMER ASSISTANCE EXP-INCENTIVES | OM908x | F026 | - | - | - | - | - | - | - | - |
| 909 INFORMATIONAL AND INSTRUCTIONA | OM909 | F026 | - | - | - | - | - | - | 1,698,677 | - |
| 909 INFORM AND INSTRUC -LOAD MGMT | OM909x | F026 | - | - | - | - | - | - | - | - |
| 910 MISCELLANEOUS CUSTOMER SERVICE | OM910 | F026 | - | - | - | - | - | - | 1,818,935 | - |
| 911 DEMONSTRATION AND SELLING EXP | OM911 | F026 | - | - | - | - | - | - | - | - |
| 912 DEMONSTRATION AND SELLING EXP | OM912 | F026 | - | - | - | - | - | - | 121,604 | - |
| 913 ADVERTISING EXPENSES | OM913 | F026 | - | - | - | - | - | - | - | - |
| 916 MISC SALES EXPENSE | OM916 | F026 | - | - | - | - | - | - | - | - |
| Total Customer Service Expense | OMCS | | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ 5,260,656 | \$ - |
| Sub-Total Prod, Trans, Dist, Cust Acct and Cust Service | OMSUB2 | | 838,347 | 696,521 | 546,527 | 10,783,145 | 625,886 | 40,437,392 | 5,260,656 | - |

KENTUCKY UTILITIES COMPANY
 Cost of Service Study
 Functional Assignment and Classification
 12 Months Ended June 30, 2022

LOLP METHODOLOGY

| Description | Name | Functional Vector | Total System | Production Demand | Production Energy | Transmission Demand | Distribution Poles | Distribution Substation | Distribution Primary Lines | | | Distribution Sec. Lines | |
|--|-------|-------------------|----------------|-------------------|-------------------|---------------------|--------------------|-------------------------|----------------------------|---------------|---------------|-------------------------|---------------|
| | | | | LOLP | Energy | Demand | Specific | General | Specific | Demand | Customer | Demand | Customer |
| Operation and Maintenance Expenses (Continued) | | | | | | | | | | | | | |
| Administrative and General Expense | | | | | | | | | | | | | |
| 920 ADMIN. & GEN. SALARIES- | OM920 | LBSUB7 | \$ 32,982,894 | 10,837,882 | 7,424,570 | 2,365,589 | - | 990,227 | - | 787,580 | 1,530,871 | 354,557 | 715,762 |
| 921 OFFICE SUPPLIES AND EXPENSES | OM921 | LBSUB7 | 10,307,282 | 3,386,880 | 2,320,207 | 739,256 | - | 309,450 | - | 246,122 | 478,403 | 110,800 | 223,678 |
| 922 ADMINISTRATIVE EXPENSES TRANSFERRED | OM922 | LBSUB7 | (6,211,522) | (2,041,050) | (1,398,236) | (445,501) | - | (186,485) | - | (148,321) | (288,302) | (66,772) | (134,796) |
| 923 OUTSIDE SERVICES EMPLOYED | OM923 | LBSUB7 | 21,332,833 | 7,009,777 | 4,802,099 | 1,530,027 | - | 640,464 | - | 509,395 | 990,144 | 229,322 | 462,944 |
| 924 PROPERTY INSURANCE | OM924 | TUP | 8,726,372 | 5,439,383 | - | 1,243,596 | - | 320,301 | - | 254,753 | 495,179 | 114,686 | 231,522 |
| 925 INJURIES AND DAMAGES - INSURAN | OM925 | LBSUB7 | 4,777,652 | 1,569,893 | 1,075,467 | 342,661 | - | 143,437 | - | 114,083 | 221,750 | 51,358 | 103,680 |
| 926 EMPLOYEE BENEFITS | OM926 | LBSUB7 | 31,473,418 | 10,341,882 | 7,084,781 | 2,257,327 | - | 944,909 | - | 751,536 | 1,460,810 | 338,330 | 683,004 |
| 928 REGULATORY COMMISSION FEES | OM928 | TUP | 851,305 | 530,641 | - | 121,320 | - | 31,247 | - | 24,852 | 48,307 | 11,188 | 22,586 |
| 929 DUPLICATE CHARGES | OM929 | LBSUB7 | - | - | - | - | - | - | - | - | - | - | - |
| 930 MISCELLANEOUS GENERAL EXPENSES | OM930 | LBSUB7 | 3,314,333 | 1,089,060 | 746,068 | 237,710 | - | 99,504 | - | 79,141 | 153,832 | 35,628 | 71,924 |
| 931 RENTS AND LEASES | OM931 | PGP | 3,079,062 | 1,937,732 | - | 419,451 | - | 113,154 | - | 89,998 | 174,934 | 40,516 | 81,791 |
| 935 MAINTENANCE OF GENERAL PLANT | OM935 | PGP | 1,672,323 | 1,052,435 | - | 227,815 | - | 61,457 | - | 48,880 | 95,012 | 22,005 | 44,423 |
| Total Administrative and General Expense | OMAG | | \$ 112,305,952 | \$ 41,154,516 | \$ 22,054,956 | \$ 9,039,250 | \$ - | \$ 3,467,664 | \$ - | \$ 2,758,018 | \$ 5,360,940 | \$ 1,241,618 | \$ 2,506,518 |
| Total Operation and Maintenance Expenses | TOM | | \$ 892,295,073 | \$ 133,195,931 | \$ 555,456,787 | \$ 57,756,584 | \$ - | \$ 9,282,793 | \$ - | \$ 12,963,444 | \$ 23,791,490 | \$ 5,561,431 | \$ 10,375,667 |
| Operation and Maintenance Expenses Less Purchase Power | OMLPP | | \$ 843,751,066 | \$ 123,623,319 | \$ 516,485,392 | \$ 57,756,584 | \$ - | \$ 9,282,793 | \$ - | \$ 12,963,444 | \$ 23,791,490 | \$ 5,561,431 | \$ 10,375,667 |

KENTUCKY UTILITIES COMPANY
 Cost of Service Study
 Functional Assignment and Classification
 12 Months Ended June 30, 2022

LOLP METHODOLOGY

| Description | Name | Functional Vector | Distribution Line Trans. | | Distribution Services | Distribution Meters | Distribution St. & Cust. Lighting | Customer Accounts Expense | Customer Service & Info. | Sales Expense |
|--|-------|-------------------|--------------------------|--------------|-----------------------|---------------------|-----------------------------------|---------------------------|--------------------------|---------------|
| | | | Demand | Customer | Customer | | | | | |
| Operation and Maintenance Expenses (Continued) | | | | | | | | | | |
| Administrative and General Expense | | | | | | | | | | |
| 920 ADMIN. & GEN. SALARIES- | OM920 | LBSUB7 | 516,849 | 429,412 | 362,049 | 215,325 | 414,621 | 5,393,575 | 644,026 | - |
| 921 OFFICE SUPPLIES AND EXPENSES | OM921 | LBSUB7 | 161,517 | 134,193 | 113,142 | 67,290 | 129,571 | 1,685,513 | 201,261 | - |
| 922 ADMINISTRATIVE EXPENSES TRANSFERRED | OM922 | LBSUB7 | (97,336) | (80,869) | (68,183) | (40,551) | (78,084) | (1,015,748) | (121,287) | - |
| 923 OUTSIDE SERVICES EMPLOYED | OM923 | LBSUB7 | 334,290 | 277,737 | 234,168 | 139,269 | 268,170 | 3,488,482 | 416,546 | - |
| 924 PROPERTY INSURANCE | OM924 | TUP | 167,181 | 138,899 | 117,109 | 69,649 | 134,114 | - | - | - |
| 925 INJURIES AND DAMAGES - INSURAN | OM925 | LBSUB7 | 74,867 | 62,201 | 52,444 | 31,190 | 60,059 | 781,272 | 93,289 | - |
| 926 EMPLOYEE BENEFITS | OM926 | LBSUB7 | 493,195 | 409,760 | 345,480 | 205,470 | 395,646 | 5,146,736 | 614,552 | - |
| 928 REGULATORY COMMISSION FEES | OM928 | TUP | 16,309 | 13,550 | 11,425 | 6,795 | 13,084 | - | - | - |
| 929 DUPLICATE CHARGES | OM929 | LBSUB7 | - | - | - | - | - | - | - | - |
| 930 MISCELLANEOUS GENERAL EXPENSES | OM930 | LBSUB7 | 51,936 | 43,150 | 36,381 | 21,637 | 41,664 | 541,981 | 64,716 | - |
| 931 RENTS AND LEASES | OM931 | PGP | 59,061 | 49,069 | 41,372 | 24,605 | 47,379 | - | - | - |
| 935 MAINTENANCE OF GENERAL PLANT | OM935 | PGP | 32,078 | 26,651 | 22,470 | 13,364 | 25,733 | - | - | - |
| Total Administrative and General Expense | OMAG | | \$ 1,809,949 | \$ 1,503,754 | \$ 1,267,856 | \$ 754,043 | \$ 1,451,957 | \$ 16,021,811 | \$ 1,913,104 | \$ - |
| Total Operation and Maintenance Expenses | TOM | | \$ 2,648,296 | \$ 2,200,276 | \$ 1,814,383 | \$ 1,153,718 | \$ 2,077,842 | \$ 56,459,203 | \$ 7,173,760 | \$ - |
| Operation and Maintenance Expenses Less Purchase Power | OMLPP | | \$ 2,648,296 | \$ 2,200,276 | \$ 1,814,383 | \$ 1,153,718 | \$ 2,077,842 | \$ 56,459,203 | \$ 7,173,760 | \$ - |

KENTUCKY UTILITIES COMPANY
 Cost of Service Study
 Functional Assignment and Classification
 12 Months Ended June 30, 2022

LOLP METHODOLOGY

| Description | Name | Functional Vector | Total System | Production Demand | Production Energy | Transmission Demand | Distribution Poles | Distribution Substation | Distribution Primary Lines | | | Distribution Sec. Lines | | |
|---|--------|-------------------|---------------|-------------------|-------------------|---------------------|--------------------|-------------------------|----------------------------|--------------|--------------|-------------------------|--------------|------|
| | | | | LOLP | Energy | Demand | Specific | General | Specific | Demand | Customer | Demand | Customer | |
| Labor Expenses (Continued) | | | | | | | | | | | | | | |
| Transmission Labor Expenses | | | | | | | | | | | | | | |
| 560 OPERATION SUPERVISION AND ENG | LB560 | PTRAN | \$ 1,591,418 | - | - | 1,591,418 | - | - | - | - | - | - | - | - |
| 561 LOAD DISPATCHING | LB561 | PTRAN | 4,089,959 | - | - | 4,089,959 | - | - | - | - | - | - | - | - |
| 562 STATION EXPENSES | LB562 | PTRAN | 424,026 | - | - | 424,026 | - | - | - | - | - | - | - | - |
| 563 OVERHEAD LINE EXPENSES | LB563 | PTRAN | 45,989 | - | - | 45,989 | - | - | - | - | - | - | - | - |
| 566 MISC. TRANSMISSION EXPENSES | LB566 | PTRAN | - | - | - | - | - | - | - | - | - | - | - | - |
| 568 MAINTENACE SUPERVISION AND ENG | LB568 | PTRAN | 393,950 | - | - | 393,950 | - | - | - | - | - | - | - | - |
| 570 MAINT OF STATION EQUIPMENT | LB570 | PTRAN | - | - | - | - | - | - | - | - | - | - | - | - |
| 571 MAINT OF OVERHEAD LINES | LB571 | PTRAN | - | - | - | - | - | - | - | - | - | - | - | - |
| 572 UNDERGROUND LINES | LB572 | PTRAN | 1,126,679 | - | - | 1,126,679 | - | - | - | - | - | - | - | - |
| 573 MISC PLANT | LB573 | PTRAN | 309,102 | - | - | 309,102 | - | - | - | - | - | - | - | - |
| Total Transmission Labor Expenses | LBTRAN | | \$ 7,981,123 | \$ - | \$ - | \$ 7,981,123 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Distribution Operation Labor Expense | | | | | | | | | | | | | | |
| 580 OPERATION SUPERVISION AND ENGI | LB580 | F023 | \$ 1,268,655 | - | - | - | - | 197,594 | - | 116,756 | 214,361 | 50,105 | 93,531 | - |
| 581 LOAD DISPATCHING | LB581 | P362 | 335,815 | - | - | - | - | 335,815 | - | - | - | - | - | - |
| 582 STATION EXPENSES | LB582 | P362 | 1,155,025 | - | - | - | - | 1,155,025 | - | - | - | - | - | - |
| 583 OVERHEAD LINE EXPENSES | LB583 | P365 | 3,066,624 | - | - | - | - | - | - | 778,967 | 1,384,229 | 325,324 | 578,103 | |
| 584 UNDERGROUND LINE EXPENSES | LB584 | P367 | 28,983 | - | - | - | - | - | - | 4,405 | 13,132 | 2,875 | 8,570 | |
| 585 STREET LIGHTING EXPENSE | LB585 | P371 | - | - | - | - | - | - | - | - | - | - | - | |
| 586 METER EXPENSES | LB586 | P370 | 5,005,004 | - | - | - | - | - | - | - | - | - | - | |
| 586 METER EXPENSES - LOAD MANAGEMENT | LB586x | F012 | - | - | - | - | - | - | - | - | - | - | - | |
| 587 CUSTOMER INSTALLATIONS EXPENSE | LB587 | P371 | - | - | - | - | - | - | - | - | - | - | - | |
| 588 MISCELLANEOUS DISTRIBUTION EXP | LB588 | PDIST | 3,043,460 | - | - | - | - | 477,061 | - | 379,432 | 737,527 | 170,815 | 344,832 | |
| 589 RENTS | LB589 | PDIST | - | - | - | - | - | - | - | - | - | - | - | |
| Total Distribution Operation Labor Expense | LBDO | | \$ 13,903,566 | \$ - | \$ - | \$ - | \$ - | \$ 2,165,496 | \$ - | \$ 1,279,560 | \$ 2,349,250 | \$ 549,119 | \$ 1,025,037 | |

KENTUCKY UTILITIES COMPANY
 Cost of Service Study
 Functional Assignment and Classification
 12 Months Ended June 30, 2022

LOLP METHODOLOGY

| Description | Name | Functional Vector | Distribution Line Trans. | | Distribution Services | Distribution Meters | Distribution St. & Cust. Lighting | Customer Accounts Expense | Customer Service & Info. | Sales Expense |
|---|--------|-------------------|--------------------------|------------|-----------------------|---------------------|-----------------------------------|---------------------------|--------------------------|---------------|
| | | | Demand | Customer | Customer | | | | | |
| Labor Expenses (Continued) | | | | | | | | | | |
| Transmission Labor Expenses | | | | | | | | | | |
| 560 OPERATION SUPERVISION AND ENG | LB560 | PTRAN | - | - | - | - | - | - | - | - |
| 561 LOAD DISPATCHING | LB561 | PTRAN | - | - | - | - | - | - | - | - |
| 562 STATION EXPENSES | LB562 | PTRAN | - | - | - | - | - | - | - | - |
| 563 OVERHEAD LINE EXPENSES | LB563 | PTRAN | - | - | - | - | - | - | - | - |
| 566 MISC. TRANSMISSION EXPENSES | LB566 | PTRAN | - | - | - | - | - | - | - | - |
| 568 MAINTENACE SUPERVISION AND ENG | LB568 | PTRAN | - | - | - | - | - | - | - | - |
| 570 MAINT OF STATION EQUIPMENT | LB570 | PTRAN | - | - | - | - | - | - | - | - |
| 571 MAINT OF OVERHEAD LINES | LB571 | PTRAN | - | - | - | - | - | - | - | - |
| 572 UNDERGROUND LINES | LB572 | PTRAN | - | - | - | - | - | - | - | - |
| 573 MISC PLANT | LB573 | PTRAN | - | - | - | - | - | - | - | - |
| Total Transmission Labor Expenses | LBTRAN | | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Distribution Operation Labor Expense | | | | | | | | | | |
| 580 OPERATION SUPERVISION AND ENGI | LB580 | F023 | 25,002 | 20,772 | 17,514 | 512,962 | 20,057 | - | - | - |
| 581 LOAD DISPATCHING | LB581 | P362 | - | - | - | - | - | - | - | - |
| 582 STATION EXPENSES | LB582 | P362 | - | - | - | - | - | - | - | - |
| 583 OVERHEAD LINE EXPENSES | LB583 | P365 | - | - | - | - | - | - | - | - |
| 584 UNDERGROUND LINE EXPENSES | LB584 | P367 | - | - | - | - | - | - | - | - |
| 585 STREET LIGHTING EXPENSE | LB585 | P371 | - | - | - | - | - | - | - | - |
| 586 METER EXPENSES | LB586 | P370 | - | - | - | 5,005,004 | - | - | - | - |
| 586 METER EXPENSES - LOAD MANAGEMENT | LB586x | F012 | - | - | - | - | - | - | - | - |
| 587 CUSTOMER INSTALLATIONS EXPENSE | LB587 | P371 | - | - | - | - | - | - | - | - |
| 588 MISCELLANEOUS DISTRIBUTION EXP | LB588 | PDIST | 249,002 | 206,878 | 174,424 | 103,737 | 199,752 | - | - | - |
| 589 RENTS | LB589 | PDIST | - | - | - | - | - | - | - | - |
| Total Distribution Operation Labor Expense | LBDO | | \$ 274,004 | \$ 227,650 | \$ 191,938 | \$ 5,621,703 | \$ 219,809 | \$ - | \$ - | \$ - |

KENTUCKY UTILITIES COMPANY
 Cost of Service Study
 Functional Assignment and Classification
 12 Months Ended June 30, 2022

LOLP METHODOLOGY

| Description | Name | Functional Vector | Total System | Production Demand | Production Energy | Transmission Demand | Distribution Poles | Distribution Substation | Distribution Primary Lines | | | Distribution Sec. Lines | | |
|---|--------|-------------------|---------------|-------------------|-------------------|---------------------|--------------------|-------------------------|----------------------------|--------------|--------------|-------------------------|--------------|------|
| | | | | LOLP | Energy | Demand | Specific | General | Specific | Demand | Customer | Demand | Customer | |
| Labor Expenses (Continued) | | | | | | | | | | | | | | |
| Distribution Maintenance Labor Expense | | | | | | | | | | | | | | |
| 590 MAINTENANCE SUPERVISION AND EN | LB590 | F024 | \$ - | - | - | - | - | - | - | - | - | - | - | - |
| 591 MAINTENANCE OF STRUCTURES | LB591 | P362 | - | - | - | - | - | - | - | - | - | - | - | - |
| 592 MAINTENANCE OF STATION EQUIPME | LB592 | P362 | 622,340 | - | - | - | - | 622,340 | - | - | - | - | - | - |
| 593 MAINTENANCE OF OVERHEAD LINES | LB593 | P365 | 6,481,662 | - | - | - | - | - | - | 1,646,436 | 2,925,728 | 687,610 | 1,221,888 | - |
| 594 MAINTENANCE OF UNDERGROUND LIN | LB594 | P367 | 248,892 | - | - | - | - | - | - | 37,832 | 112,773 | 24,690 | 73,598 | - |
| 595 MAINTENANCE OF LINE TRANSFORME | LB595 | P368 | 53,407 | - | - | - | - | - | - | - | - | - | - | - |
| 596 MAINTENANCE OF ST LIGHTS & SIG SYSTEMS | LB596 | P373 | - | - | - | - | - | - | - | - | - | - | - | - |
| 597 MAINTENANCE OF METERS | LB597 | P370 | - | - | - | - | - | - | - | - | - | - | - | - |
| 598 MAINTENANCE OF MISC DISTR PLANT | LB598 | PDIST | 3,541 | - | - | - | - | 555 | - | 441 | 858 | 199 | 401 | - |
| Total Distribution Maintenance Labor Expense | LBDM | | \$ 7,409,842 | \$ - | \$ - | \$ - | \$ - | \$ 622,895 | \$ - | \$ 1,684,710 | \$ 3,039,359 | \$ 712,499 | \$ 1,295,886 | |
| Total Distribution Operation and Maintenance Labor Expenses | | PDIST | 21,313,408 | - | - | - | - | 3,340,868 | - | 2,657,171 | 5,164,916 | 1,196,218 | 2,414,866 | |
| Transmission and Distribution Labor Expenses | | | 29,294,531 | - | - | 7,981,123 | - | 3,340,868 | - | 2,657,171 | 5,164,916 | 1,196,218 | 2,414,866 | |
| Production, Transmission and Distribution Labor Expenses | LBSUB | | \$ 90,909,155 | \$ 36,565,300 | \$ 25,049,324 | \$ 7,981,123 | \$ - | \$ 3,340,868 | \$ - | \$ 2,657,171 | \$ 5,164,916 | \$ 1,196,218 | \$ 2,414,866 | |
| Customer Accounts Expense | | | | | | | | | | | | | | |
| 901 SUPERVISION/CUSTOMER ACCTS | LB901 | F025 | \$ 4,005,700 | - | - | - | - | - | - | - | - | - | - | - |
| 902 METER READING EXPENSES | LB902 | F025 | 752,362 | - | - | - | - | - | - | - | - | - | - | - |
| 903 RECORDS AND COLLECTION | LB903 | F025 | 13,439,006 | - | - | - | - | - | - | - | - | - | - | - |
| 904 UNCOLLECTIBLE ACCOUNTS | LB904 | F025 | - | - | - | - | - | - | - | - | - | - | - | - |
| 905 MISC CUST ACCOUNTS | LB903 | F025 | - | - | - | - | - | - | - | - | - | - | - | - |
| Total Customer Accounts Labor Expense | LBCA | | \$ 18,197,068 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Customer Service Expense | | | | | | | | | | | | | | |
| 907 SUPERVISION | LB907 | F026 | \$ 350,160 | - | - | - | - | - | - | - | - | - | - | - |
| 908 CUSTOMER ASSISTANCE EXPENSES | LB908 | F026 | 1,306,105 | - | - | - | - | - | - | - | - | - | - | - |
| 908 CUSTOMER ASSISTANCE EXP-LOAD MGMT | LB908x | F026 | - | - | - | - | - | - | - | - | - | - | - | - |
| 909 INFORMATIONAL AND INSTRUCTIONA | LB909 | F026 | - | - | - | - | - | - | - | - | - | - | - | - |
| 909 INFORM AND INSTRUC -LOAD MGMT | LB909x | F026 | - | - | - | - | - | - | - | - | - | - | - | - |
| 910 MISCELLANEOUS CUSTOMER SERVICE | LB910 | F026 | 516,578 | - | - | - | - | - | - | - | - | - | - | - |
| 911 DEMONSTRATION AND SELLING EXP | LB911 | F026 | - | - | - | - | - | - | - | - | - | - | - | - |
| 912 DEMONSTRATION AND SELLING EXP | LB912 | F026 | - | - | - | - | - | - | - | - | - | - | - | - |
| 913 WATER HEATER - HEAT PUMP PROGRAM | LB913 | F026 | - | - | - | - | - | - | - | - | - | - | - | - |
| 916 MISC SALES EXPENSE | LB916 | F026 | - | - | - | - | - | - | - | - | - | - | - | - |
| Total Customer Service Labor Expense | LBCS | | \$ 2,172,843 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Sub-Total Labor Exp | LBSUB7 | | 111,279,066 | 36,565,300 | 25,049,324 | 7,981,123 | - | 3,340,868 | - | 2,657,171 | 5,164,916 | 1,196,218 | 2,414,866 | |

KENTUCKY UTILITIES COMPANY
 Cost of Service Study
 Functional Assignment and Classification
 12 Months Ended June 30, 2022

LOLP METHODOLOGY

| Description | Name | Functional Vector | Distribution Line Trans. | | Distribution Services | Distribution Meters | Distribution St. & Cust. Lighting | Customer Accounts Expense | Customer Service & Info. | Sales Expense |
|---|--------|-------------------|--------------------------|--------------|-----------------------|---------------------|-----------------------------------|---------------------------|--------------------------|---------------|
| | | | Demand | Customer | Customer | | | | | |
| Labor Expenses (Continued) | | | | | | | | | | |
| Distribution Maintenance Labor Expense | | | | | | | | | | |
| 590 MAINTENANCE SUPERVISION AND EN | LB590 | F024 | - | - | - | - | - | - | - | - |
| 591 MAINTENANCE OF STRUCTURES | LB591 | P362 | - | - | - | - | - | - | - | - |
| 592 MAINTENANCE OF STATION EQUIPME | LB592 | P362 | - | - | - | - | - | - | - | - |
| 593 MAINTENANCE OF OVERHEAD LINES | LB593 | P365 | - | - | - | - | - | - | - | - |
| 594 MAINTENANCE OF UNDERGROUND LIN | LB594 | P367 | - | - | - | - | - | - | - | - |
| 595 MAINTENANCE OF LINE TRANSFORME | LB595 | P368 | 29,171 | 24,236 | - | - | - | - | - | - |
| 596 MAINTENANCE OF ST LIGHTS & SIG SYSTEMS | LB596 | P373 | - | - | - | - | - | - | - | - |
| 597 MAINTENANCE OF METERS | LB597 | P370 | - | - | - | - | - | - | - | - |
| 598 MAINTENANCE OF MISC DISTR PLANT | LB598 | PDIST | 290 | 241 | 203 | 121 | 232 | - | - | - |
| Total Distribution Maintenance Labor Expense | LBDM | | \$ 29,461 | \$ 24,477 | \$ 203 | \$ 121 | \$ 232 | \$ - | \$ - | \$ - |
| Total Distribution Operation and Maintenance Labor Expenses | | PDIST | 1,743,767 | 1,448,769 | 1,221,497 | 726,471 | 1,398,865 | - | - | - |
| Transmission and Distribution Labor Expenses | | | 1,743,767 | 1,448,769 | 1,221,497 | 726,471 | 1,398,865 | - | - | - |
| Production, Transmission and Distribution Labor Expenses | LBSUB | | \$ 1,743,767 | \$ 1,448,769 | \$ 1,221,497 | \$ 726,471 | \$ 1,398,865 | \$ - | \$ - | \$ - |
| Customer Accounts Expense | | | | | | | | | | |
| 901 SUPERVISION/CUSTOMER ACCTS | LB901 | F025 | - | - | - | - | - | 4,005,700 | - | - |
| 902 METER READING EXPENSES | LB902 | F025 | - | - | - | - | - | 752,362 | - | - |
| 903 RECORDS AND COLLECTION | LB903 | F025 | - | - | - | - | - | 13,439,006 | - | - |
| 904 UNCOLLECTIBLE ACCOUNTS | LB904 | F025 | - | - | - | - | - | - | - | - |
| 905 MISC CUST ACCOUNTS | LB903 | F025 | - | - | - | - | - | - | - | - |
| Total Customer Accounts Labor Expense | LBCA | | \$ - | \$ - | \$ - | \$ - | \$ - | \$ 18,197,068 | \$ - | \$ - |
| Customer Service Expense | | | | | | | | | | |
| 907 SUPERVISION | LB907 | F026 | - | - | - | - | - | - | 350,160 | - |
| 908 CUSTOMER ASSISTANCE EXPENSES | LB908 | F026 | - | - | - | - | - | - | 1,306,105 | - |
| 908 CUSTOMER ASSISTANCE EXP-LOAD MGMT | LB908x | F026 | - | - | - | - | - | - | - | - |
| 909 INFORMATIONAL AND INSTRUCTIONA | LB909 | F026 | - | - | - | - | - | - | - | - |
| 909 INFORM AND INSTRUC -LOAD MGMT | LB909x | F026 | - | - | - | - | - | - | - | - |
| 910 MISCELLANEOUS CUSTOMER SERVICE | LB910 | F026 | - | - | - | - | - | - | 516,578 | - |
| 911 DEMONSTRATION AND SELLING EXP | LB911 | F026 | - | - | - | - | - | - | - | - |
| 912 DEMONSTRATION AND SELLING EXP | LB912 | F026 | - | - | - | - | - | - | - | - |
| 913 WATER HEATER - HEAT PUMP PROGRAM | LB913 | F026 | - | - | - | - | - | - | - | - |
| 916 MISC SALES EXPENSE | LB916 | F026 | - | - | - | - | - | - | - | - |
| Total Customer Service Labor Expense | LBCS | | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ 2,172,843 | \$ - |
| Sub-Total Labor Exp | LBSUB7 | | 1,743,767 | 1,448,769 | 1,221,497 | 726,471 | 1,398,865 | 18,197,068 | 2,172,843 | - |

KENTUCKY UTILITIES COMPANY
 Cost of Service Study
 Functional Assignment and Classification
 12 Months Ended June 30, 2022

LOLP METHODOLOGY

| Description | Name | Functional Vector | Total System | Production Demand | Production Energy | Transmission Demand | Distribution Poles | Distribution Substation | Distribution Primary Lines | | | Distribution Sec. Lines | |
|--|-------|-------------------|----------------|-------------------|-------------------|---------------------|--------------------|-------------------------|----------------------------|--------------|--------------|-------------------------|--------------|
| | | | | LOLP | Energy | Demand | Specific | General | Specific | Demand | Customer | Demand | Customer |
| Labor Expenses (Continued) | | | | | | | | | | | | | |
| Administrative and General Expense | | | | | | | | | | | | | |
| 920 ADMIN. & GEN. SALARIES- | LB920 | LBSUB7 | \$ 32,982,892 | 10,837,882 | 7,424,569 | 2,365,589 | - | 990,227 | - | 787,580 | 1,530,871 | 354,556 | 715,761 |
| 921 OFFICE SUPPLIES AND EXPENSES | LB921 | LBSUB7 | 4,507 | 1,481 | 1,015 | 323 | - | 135 | - | 108 | 209 | 48 | 98 |
| 922 ADMIN. EXPENSES TRANSFERRED - CREDIT | LB922 | LBSUB7 | (4,373,143) | (1,436,975) | (984,410) | (313,649) | - | (131,292) | - | (104,424) | (202,975) | (47,010) | (94,902) |
| 923 OUTSIDE SERVICES EMPLOYED | LB923 | LBSUB7 | - | - | - | - | - | - | - | - | - | - | - |
| 924 PROPERTY INSURANCE | LB924 | TUP | - | - | - | - | - | - | - | - | - | - | - |
| 925 INJURIES AND DAMAGES - INSURAN | LB925 | LBSUB7 | 615,769 | 202,336 | 138,612 | 44,164 | - | 18,487 | - | 14,704 | 28,580 | 6,619 | 13,363 |
| 926 EMPLOYEE BENEFITS | LB926 | LBSUB7 | 31,672,892 | 10,407,427 | 7,129,684 | 2,271,633 | - | 950,897 | - | 756,299 | 1,470,068 | 340,474 | 687,333 |
| 928 REGULATORY COMMISSION FEES | LB928 | TUP | - | - | - | - | - | - | - | - | - | - | - |
| 929 DUPLICATE CHARGES-CR | LB929 | LBSUB7 | - | - | - | - | - | - | - | - | - | - | - |
| 930 MISCELLANEOUS GENERAL EXPENSES | LB930 | LBSUB7 | 314,464 | 103,330 | 70,787 | 22,554 | - | 9,441 | - | 7,509 | 14,596 | 3,380 | 6,824 |
| 931 RENTS AND LEASES | LB931 | PGP | - | - | - | - | - | - | - | - | - | - | - |
| 935 MAINTENANCE OF GENERAL PLANT | LB935 | PGP | 731,985 | 460,657 | - | 99,716 | - | 26,900 | - | 21,395 | 41,587 | 9,632 | 19,444 |
| Total Administrative and General Expense | LBAG | | \$ 61,949,366 | \$ 20,576,137 | \$ 13,780,256 | \$ 4,490,330 | \$ - | \$ 1,864,795 | \$ - | \$ 1,483,171 | \$ 2,882,936 | \$ 667,701 | \$ 1,347,922 |
| Total Operation and Maintenance Expenses | TLB | | \$ 173,228,432 | \$ 57,141,438 | \$ 38,829,580 | \$ 12,471,453 | \$ - | \$ 5,205,663 | \$ - | \$ 4,140,341 | \$ 8,047,851 | \$ 1,863,918 | \$ 3,762,788 |
| Operation and Maintenance Expenses Less Purchase Power | LBLPP | | \$ 173,228,432 | \$ 57,141,438 | \$ 38,829,580 | \$ 12,471,453 | \$ - | \$ 5,205,663 | \$ - | \$ 4,140,341 | \$ 8,047,851 | \$ 1,863,918 | \$ 3,762,788 |

KENTUCKY UTILITIES COMPANY
 Cost of Service Study
 Functional Assignment and Classification
 12 Months Ended June 30, 2022

LOLP METHODOLOGY

| Description | Name | Functional Vector | Distribution Line Trans. | | Distribution Services | Distribution Meters | Distribution St. & Cust. Lighting | Customer Accounts Expense | Customer Service & Info. | Sales Expense |
|--|-------|-------------------|--------------------------|--------------|-----------------------|---------------------|-----------------------------------|---------------------------|--------------------------|---------------|
| | | | Demand | Customer | Customer | | | | | |
| Labor Expenses (Continued) | | | | | | | | | | |
| Administrative and General Expense | | | | | | | | | | |
| 920 ADMIN. & GEN. SALARIES- | LB920 | LBSUB7 | 516,849 | 429,412 | 362,049 | 215,325 | 414,621 | 5,393,574 | 644,026 | - |
| 921 OFFICE SUPPLIES AND EXPENSES | LB921 | LBSUB7 | 71 | 59 | 49 | 29 | 57 | 737 | 88 | - |
| 922 ADMIN. EXPENSES TRANSFERRED - CREDIT | LB922 | LBSUB7 | (68,528) | (56,935) | (48,003) | (28,550) | (54,974) | (715,124) | (85,390) | - |
| 923 OUTSIDE SERVICES EMPLOYED | LB923 | LBSUB7 | - | - | - | - | - | - | - | - |
| 924 PROPERTY INSURANCE | LB924 | TUP | - | - | - | - | - | - | - | - |
| 925 INJURIES AND DAMAGES - INSURAN | LB925 | LBSUB7 | 9,649 | 8,017 | 6,759 | 4,020 | 7,741 | 100,695 | 12,024 | - |
| 926 EMPLOYEE BENEFITS | LB926 | LBSUB7 | 496,321 | 412,357 | 347,669 | 206,772 | 398,153 | 5,179,355 | 618,447 | - |
| 928 REGULATORY COMMISSION FEES | LB928 | TUP | - | - | - | - | - | - | - | - |
| 929 DUPLICATE CHARGES-CR | LB929 | LBSUB7 | - | - | - | - | - | - | - | - |
| 930 MISCELLANEOUS GENERAL EXPENSES | LB930 | LBSUB7 | 4,928 | 4,094 | 3,452 | 2,053 | 3,953 | 51,423 | 6,140 | - |
| 931 RENTS AND LEASES | LB931 | PGP | - | - | - | - | - | - | - | - |
| 935 MAINTENANCE OF GENERAL PLANT | LB935 | PGP | 14,041 | 11,665 | 9,835 | 5,849 | 11,263 | - | - | - |
| Total Administrative and General Expense | LBAG | | \$ 973,330 | \$ 808,669 | \$ 681,811 | \$ 405,499 | \$ 780,814 | \$ 10,010,660 | \$ 1,195,335 | \$ - |
| Total Operation and Maintenance Expenses | TLB | | \$ 2,717,098 | \$ 2,257,438 | \$ 1,903,307 | \$ 1,131,971 | \$ 2,179,679 | \$ 28,207,728 | \$ 3,368,178 | \$ - |
| Operation and Maintenance Expenses Less Purchase Power | LBLPP | | \$ 2,717,098 | \$ 2,257,438 | \$ 1,903,307 | \$ 1,131,971 | \$ 2,179,679 | \$ 28,207,728 | \$ 3,368,178 | \$ - |

KENTUCKY UTILITIES COMPANY
 Cost of Service Study
 Functional Assignment and Classification
 12 Months Ended June 30, 2022

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LOLP METHODOLOGY

| Description | Name | Functional Vector | Total System | Production Demand | Production Energy | Transmission Demand | Distribution Poles | Distribution Substation | Distribution Primary Lines | | | Distribution Sec. Lines | | |
|---|---------|-------------------|------------------|-------------------|-------------------|---------------------|--------------------|-------------------------|----------------------------|---------------|---------------|-------------------------|---------------|------|
| | | | | LOLP | Energy | Demand | Specific | General | Specific | Demand | Customer | Demand | Customer | |
| Other Expenses | | | | | | | | | | | | | | |
| Depreciation Expenses | | | | | | | | | | | | | | |
| Steam Production | DEPRTP | PPRTL | \$ 235,868,409 | 235,868,409 | - | - | - | - | - | - | - | - | - | - |
| Hydraulic Production | DEPRDP1 | PPRTL | 1,440,468 | 1,440,468 | - | - | - | - | - | - | - | - | - | - |
| Other Production | DEPRDP2 | PPRTL | 29,642,381 | 29,642,381 | - | - | - | - | - | - | - | - | - | - |
| Transmission - Kentucky System Property | DEPRDP3 | PTRAN | 30,191,755 | - | - | 30,191,755 | - | - | - | - | - | - | - | - |
| Transmission - Virginia Property | DEPRDP4 | PTRAN | 192,228 | - | - | 192,228 | - | - | - | - | - | - | - | - |
| Transmission - Virginia Property | DEPRDP5 | PTRAN | 20,672 | - | - | 20,672 | - | - | - | - | - | - | - | - |
| Distribution | DEPRDP6 | PDIST | 38,870,091 | - | - | - | - | 6,092,871 | - | 4,845,985 | 9,419,458 | 2,181,589 | 4,404,085 | |
| General Plant | DEPRDP7 | PGP | 13,809,821 | 8,690,872 | - | 1,881,267 | - | 507,505 | - | 403,646 | 784,593 | 181,715 | 366,838 | |
| Intangible Plant | DEPRDP8 | PINT | 20,495,320 | 12,898,226 | - | 2,792,011 | - | 753,195 | - | 599,056 | 1,164,424 | 269,686 | 544,429 | |
| Total Depreciation Expense | TDEPR | | \$ 370,531,145 | 288,540,356 | - | 35,077,933 | - | 7,353,572 | - | 5,848,688 | 11,368,475 | 2,632,990 | 5,315,352 | |
| Regulatory Credits and Accretion Expenses | | | | | | | | | | | | | | |
| Production Plant | ACRTPP | PPRTL | \$ - | - | - | - | - | - | - | - | - | - | - | - |
| Transmission Plant | ACRTPP | PTRAN | - | - | - | - | - | - | - | - | - | - | - | - |
| Distribution Plant | | PDIST | - | - | - | - | - | - | - | - | - | - | - | - |
| Total Regulatory Credits and Accretion Expenses | TACRT | | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Property Taxes | PTAX | TUP | \$ 35,914,758 | 22,386,637 | - | 5,118,215 | - | 1,318,249 | - | 1,048,474 | 2,037,987 | 472,007 | 952,865 | |
| Other Taxes | OTAX | TUP | \$ 13,649,179 | 8,507,901 | - | 1,945,146 | - | 500,992 | - | 398,466 | 774,524 | 179,383 | 362,130 | |
| Gain Disposition of Allowances | GAIN | F013 | \$ - | - | - | - | - | - | - | - | - | - | - | |
| Interest | INTLTD | TUP | \$ 109,640,429 | 68,341,836 | - | 15,624,866 | - | 4,024,346 | - | 3,200,777 | 6,221,559 | 1,440,941 | 2,908,902 | |
| Other Expenses | OT | TUP | \$ - | - | - | - | - | - | - | - | - | - | - | |
| Total Other Expenses | TOE | | \$ 529,735,511 | \$ 387,776,730 | \$ - | \$ 57,766,160 | \$ - | \$ 13,197,160 | \$ - | \$ 10,496,405 | \$ 20,402,546 | \$ 4,725,321 | \$ 9,539,249 | |
| Total Cost of Service (O&M + Other Expenses) | | | \$ 1,422,030,584 | \$ 520,972,662 | \$ 555,456,787 | \$ 115,522,743 | \$ - | \$ 22,479,953 | \$ - | \$ 23,459,849 | \$ 44,194,036 | \$ 10,286,752 | \$ 19,914,916 | |

KENTUCKY UTILITIES COMPANY
 Cost of Service Study
 Functional Assignment and Classification
 12 Months Ended June 30, 2022

LOLP METHODOLOGY

| Description | Name | Functional Vector | Distribution Line Trans. | | Distribution Services | Distribution Meters | Distribution St. & Cust. Lighting | Customer Accounts Expense | Customer Service & Info. | Sales Expense |
|---|---------|-------------------|--------------------------|--------------|-----------------------|---------------------|-----------------------------------|---------------------------|--------------------------|---------------|
| | | | Demand | Customer | Customer | | | | | |
| Other Expenses | | | | | | | | | | |
| Depreciation Expenses | | | | | | | | | | |
| Steam Production | DEPRTP | PPRTL | - | - | - | - | - | - | - | - |
| Hydraulic Production | DEPRDP1 | PPRTL | - | - | - | - | - | - | - | - |
| Other Production | DEPRDP2 | PPRTL | - | - | - | - | - | - | - | - |
| Transmission - Kentucky System Property | DEPRDP3 | PTRAN | - | - | - | - | - | - | - | - |
| Transmission - Virginia Property | DEPRDP4 | PTRAN | - | - | - | - | - | - | - | - |
| Transmission - Virginia Property | DEPRDP5 | PTRAN | - | - | - | - | - | - | - | - |
| Distribution | DEPRDP6 | PDIST | 3,180,176 | 2,642,176 | 2,227,691 | 1,324,894 | 2,551,165 | - | - | - |
| General Plant | DEPRDP7 | PGP | 264,893 | 220,080 | 185,555 | 110,357 | 212,499 | - | - | - |
| Intangible Plant | DEPRDP8 | PINT | 393,130 | 326,623 | 275,385 | 163,782 | 315,373 | - | - | - |
| Total Depreciation Expense | TDEPR | | 3,838,199 | 3,188,880 | 2,688,631 | 1,599,033 | 3,079,037 | - | - | - |
| Regulatory Credits and Accretion Expenses | | | | | | | | | | |
| Production Plant | ACRTPP | PPRTL | - | - | - | - | - | - | - | - |
| Transmission Plant | ACRTPP | PTRAN | - | - | - | - | - | - | - | - |
| Distribution Plant | | PDIST | - | - | - | - | - | - | - | - |
| Total Regulatory Credits and Accretion Expenses | TACRT | | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Property Taxes | PTAX | TUP | 688,061 | 571,659 | 481,982 | 286,653 | 551,968 | - | - | - |
| Other Taxes | OTAX | TUP | 261,493 | 217,256 | 183,174 | 108,941 | 209,772 | - | - | - |
| Gain Disposition of Allowances | GAIN | F013 | - | - | - | - | - | - | - | - |
| Interest | INTLTD | TUP | 2,100,509 | 1,745,160 | 1,471,391 | 875,094 | 1,685,047 | - | - | - |
| Other Expenses | OT | TUP | - | - | - | - | - | - | - | - |
| Total Other Expenses | TOE | | \$ 6,888,262 | \$ 5,722,954 | \$ 4,825,178 | \$ 2,869,721 | \$ 5,525,824 | \$ - | \$ - | \$ - |
| Total Cost of Service (O&M + Other Expenses) | | | \$ 9,536,558 | \$ 7,923,230 | \$ 6,639,561 | \$ 14,406,908 | \$ 7,603,667 | \$ 56,459,203 | \$ 7,173,760 | \$ - |

KENTUCKY UTILITIES COMPANY
 Cost of Service Study
 Functional Assignment and Classification
 12 Months Ended June 30, 2022

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LOLP METHODOLOGY

| Description | Name | Functional Vector | Total System | Production Demand | Production Energy | Transmission Demand | Distribution Poles | Distribution Substation | Distribution Primary Lines | | | Distribution Sec. Lines | | |
|--|--------|-------------------|---------------|-------------------|-------------------|---------------------|--------------------|-------------------------|----------------------------|-------------|-------------|-------------------------|-------------|-------------|
| | | | | LOLP | Energy | Demand | Specific | General | Specific | Demand | Customer | Demand | Customer | |
| Functional Vectors | | | | | | | | | | | | | | |
| Station Equipment | F001 | | 1.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 1.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 |
| Poles, Towers and Fixtures | F002 | | 1.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.254015 | 0.451385 | 0.106085 | 0.188515 | 0.188515 |
| Overhead Conductors and Devices | F003 | | 1.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.254015 | 0.451385 | 0.106085 | 0.188515 | 0.188515 |
| Underground Conductors and Devices | F004 | | 1.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.152001 | 0.453099 | 0.099199 | 0.295701 | 0.295701 |
| Line Transformers | F005 | | 1.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 |
| Services | F006 | | 1.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 |
| Meters | F007 | | 1.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 |
| Street Lighting | F008 | | 1.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 |
| Meter Reading | F009 | | 1.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 |
| Billing | F010 | | 1.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 |
| Transmission | F011 | | 1.000000 | 0.000000 | 0.000000 | 1.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 |
| Load Management | F012 | | 1.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 |
| Production Plant | F017 | | 1.000000 | 1.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 |
| Provar | PROVAR | | 1.000000 | 0.000000 | 1.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 |
| Fuel | F018 | | 1.000000 | 0.000000 | 1.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 |
| Steam Generation Operation Labor | F019 | | 22,766,997 | 20,328,513 | 2,438,484 | - | - | - | - | - | - | - | - | - |
| PROFIX | PROFIX | | 1.000000 | 1.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 |
| Steam Generation Maintenance Labor | F020 | | 13,594,923 | 1,477,460 | 12,117,463 | - | - | - | - | - | - | - | - | - |
| Hydraulic Generation Operation Labor | F021 | | - | - | - | - | - | - | - | - | - | - | - | - |
| Hydraulic Generation Maintenance Labor | F022 | | 67,678 | 44,297 | 23,381 | - | - | - | - | - | - | - | - | - |
| Distribution Operation Labor | F023 | | 12,634,911 | - | - | - | - | 1,967,901 | - | 1,162,805 | 2,134,889 | 499,014 | 931,506 | 931,506 |
| Distribution Maintenance Labor | F024 | | 7,409,842 | - | - | - | - | 622,895 | - | 1,684,710 | 3,039,359 | 712,499 | 1,295,886 | 1,295,886 |
| Customer Accounts Expense | F025 | | 1.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 |
| Customer Service Expense | F026 | | 1.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 |
| Customer Advances | F027 | | 1,169,477,392 | - | - | - | - | - | - | 271,796,970 | 528,309,481 | 122,358,838 | 247,012,103 | 247,012,103 |
| Purchase Power Demand | F017 | | 9,604,907 | 9,604,907 | - | - | - | - | - | - | - | - | - | - |
| Purchase Power Energy | F018 | | 39,102,871 | - | 39,102,871 | - | - | - | - | - | - | - | - | - |
| Purchased Power Expenses | OMPP | | 48,707,778 | 9,604,907 | 39,102,871 | - | - | - | - | - | - | - | - | - |
| Gain Disposition of Allowances | F013 | | 1.000000 | - | 1.000000 | - | - | - | - | - | - | - | - | - |
| Intallations on Customer Premises - Accum Depr | F014 | | 1.000000 | - | - | - | - | - | - | - | - | - | - | - |
| Generators -Energy | F015 | | 1.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 |
| Energy | Energy | | 1.000000 | 0.000000 | 1.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 |
| Internally Generated Functional Vectors | | | | | | | | | | | | | | |
| Total Prod, Trans, and Dist Plant | PT&D | | 1.000000 | 0.629325 | - | 0.136227 | - | 0.036750 | - | 0.029229 | 0.056814 | 0.013158 | 0.026564 | 0.026564 |
| Total Distribution Plant | PDIST | | 1.000000 | - | - | - | - | 0.156750 | - | 0.124671 | 0.242332 | 0.056125 | 0.113303 | 0.113303 |
| Total Transmission Plant | PTRAN | | 1.000000 | - | - | 1.000000 | - | - | - | - | - | - | - | - |
| Operation and Maintenance Expenses Less Purchase Power | OMLPP | | 1.000000 | 0.146516 | 0.612130 | 0.068452 | - | 0.011002 | - | 0.015364 | 0.028197 | 0.006591 | 0.012297 | 0.012297 |
| Total Plant in Service | TPIS | | 1.000000 | 0.629277 | - | 0.136210 | - | 0.036760 | - | 0.029237 | 0.056830 | 0.013162 | 0.026571 | 0.026571 |
| Total Operation and Maintenance Expenses (Labor) | TLB | | 1.000000 | 0.329862 | 0.224152 | 0.071994 | - | 0.030051 | - | 0.023901 | 0.046458 | 0.010760 | 0.021722 | 0.021722 |
| Sub-Total Prod, Trans, Dist, Cust Acct and Cust Service | OMSUB2 | | 1.000000 | 0.118003 | 0.683858 | 0.062459 | - | 0.007455 | - | 0.013084 | 0.023629 | 0.005558 | 0.010089 | 0.010089 |
| Total Steam Power Operation Expenses (Labor) | LBSUB1 | | 1.000000 | 0.892894 | 0.107106 | - | - | - | - | - | - | - | - | - |
| Total Steam Power Generation Maintenance Expense (Labor) | LBSUB2 | | 1.000000 | 0.108677 | 0.891323 | - | - | - | - | - | - | - | - | - |
| Total Hydraulic Power Operation Expenses (Labor) | LBSUB3 | | 1.000000 | #DIV/0! | #DIV/0! | #DIV/0! | #DIV/0! | #DIV/0! | #DIV/0! | #DIV/0! | #DIV/0! | #DIV/0! | #DIV/0! | #DIV/0! |
| Total Hydraulic Power Generation Maint. Expense (Labor) | LBSUB4 | | 1.000000 | 0.654526 | 0.345474 | - | - | - | - | - | - | - | - | - |
| Total Other Power Generation Expenses (Labor) | LBSUB5 | | 1.000000 | 1.000000 | - | - | - | - | - | - | - | - | - | - |
| Total Transmission Labor Expenses | LBTRAN | | 1.000000 | - | - | 1.000000 | - | - | - | - | - | - | - | - |
| Total Distribution Operation Labor Expense | LBDO | | 1.000000 | - | - | - | - | 0.155751 | - | 0.092031 | 0.168967 | 0.039495 | 0.073725 | 0.073725 |
| Total Distribution Maintenance Labor Expense | LBDM | | 1.000000 | - | - | - | - | 0.084063 | - | 0.227361 | 0.410179 | 0.096156 | 0.174887 | 0.174887 |
| Sub-Total Labor Exp | LBSUB7 | | 1.000000 | 0.328591 | 0.225104 | 0.071722 | - | 0.030022 | - | 0.023878 | 0.046414 | 0.010750 | 0.021701 | 0.021701 |
| Total General Plant | PGP | | 1.000000 | 0.629325 | - | 0.136227 | - | 0.036750 | - | 0.029229 | 0.056814 | 0.013158 | 0.026564 | 0.026564 |
| Total Production Plant | PPRTL | | 1.000000 | 1.000000 | - | - | - | - | - | - | - | - | - | - |
| Total Intangible Plant | PINT | | 1.000000 | 0.629325 | - | 0.136227 | - | 0.036750 | - | 0.029229 | 0.056814 | 0.013158 | 0.026564 | 0.026564 |

KENTUCKY UTILITIES COMPANY
Cost of Service Study
Functional Assignment and Classification
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LOLP METHODOLOGY

| Description | Name | Functional Vector | Distribution Line Trans. | | Distribution Services | Distribution Meters | Distribution St. & Cust. Lighting | Customer Accounts Expense | Customer Service & Info. | Sales Expense |
|--|--------|-------------------|--------------------------|----------|-----------------------|---------------------|-----------------------------------|---------------------------|--------------------------|---------------|
| | | | Demand | Customer | Customer | | | | | |
| Functional Vectors | | | | | | | | | | |
| Station Equipment | F001 | | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 |
| Poles, Towers and Fixtures | F002 | | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 |
| Overhead Conductors and Devices | F003 | | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 |
| Underground Conductors and Devices | F004 | | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 |
| Line Transformers | F005 | | 0.546201 | 0.453799 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 |
| Services | F006 | | 0.00000 | 0.00000 | 1.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 |
| Meters | F007 | | 0.00000 | 0.00000 | 0.00000 | 1.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 |
| Street Lighting | F008 | | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 1.00000 | 0.00000 | 0.00000 | 0.00000 |
| Meter Reading | F009 | | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 1.00000 | 0.00000 | 0.00000 |
| Billing | F010 | | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 1.00000 | 0.00000 |
| Transmission | F011 | | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 |
| Load Management | F012 | | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 1.00000 |
| Production Plant | F017 | | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 |
| Provar | PROVAR | | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 |
| Fuel | F018 | | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 |
| Steam Generation Operation Labor | F019 | | - | - | - | - | - | - | - | - |
| PROFIX | PROFIX | | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 |
| Steam Generation Maintenance Labor | F020 | | - | - | - | - | - | - | - | - |
| Hydraulic Generation Operation Labor | F021 | | - | - | - | - | - | - | - | - |
| Hydraulic Generation Maintenance Labor | F022 | | - | - | - | - | - | - | - | - |
| Distribution Operation Labor | F023 | | 249,002 | 206,878 | 174,424 | 5,108,741 | 199,752 | - | - | - |
| Distribution Maintenance Labor | F024 | | 29,461 | 24,477 | 203 | 121 | 232 | - | - | - |
| Customer Accounts Expense | F025 | | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 1.00000 | 0.00000 | 0.00000 |
| Customer Service Expense | F026 | | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 1.00000 | 0.00000 |
| Customer Advances | F027 | | - | - | - | - | - | - | - | - |
| Purchase Power Demand | F017 | | - | - | - | - | - | - | - | - |
| Purchase Power Energy | F018 | | - | - | - | - | - | - | - | - |
| Purchased Power Expenses | OMPP | | - | - | - | - | - | - | - | - |
| Gain Disposition of Allowances | F013 | | - | - | - | - | - | - | - | - |
| Intallations on Customer Premises - Accum Depr | F014 | | - | - | - | - | - | 1.00000 | - | - |
| Generators -Energy | F015 | | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 |
| Energy | Energy | | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 |
| Internally Generated Functional Vectors | | | | | | | | | | |
| Total Prod, Trans, and Dist Plant | PT&D | | 0.019181 | 0.015936 | 0.013436 | 0.007991 | 0.015388 | - | - | - |
| Total Distribution Plant | PDIST | | 0.081816 | 0.067975 | 0.057311 | 0.034085 | 0.065633 | - | - | - |
| Total Transmission Plant | PTRAN | | - | - | - | - | - | - | - | - |
| Operation and Maintenance Expenses Less Purchase Power | OMLPP | | 0.003139 | 0.002608 | 0.002150 | 0.013674 | 0.002463 | 0.066915 | 0.008502 | - |
| Total Plant in Service | TPIS | | 0.019187 | 0.015941 | 0.013440 | 0.007993 | 0.015392 | - | - | - |
| Total Operation and Maintenance Expenses (Labor) | TLB | | 0.015685 | 0.013032 | 0.010987 | 0.006535 | 0.012583 | 0.162835 | 0.019444 | - |
| Sub-Total Prod, Trans, Dist, Cust Acct and Cust Service | OMSUB2 | | 0.001075 | 0.000893 | 0.000701 | 0.013825 | 0.000802 | 0.051844 | 0.006745 | - |
| Total Steam Power Operation Expenses (Labor) | LBSUB1 | | - | - | - | - | - | - | - | - |
| Total Steam Power Generation Maintenance Expense (Labor) | LBSUB2 | | - | - | - | - | - | - | - | - |
| Total Hydraulic Power Operation Expenses (Labor) | LBSUB3 | | #DIV/0! | #DIV/0! | #DIV/0! | #DIV/0! | #DIV/0! | #DIV/0! | #DIV/0! | #DIV/0! |
| Total Hydraulic Power Generation Maint. Expense (Labor) | LBSUB4 | | - | - | - | - | - | - | - | - |
| Total Other Power Generation Expenses (Labor) | LBSUB5 | | - | - | - | - | - | - | - | - |
| Total Transmission Labor Expenses | LBTRAN | | - | - | - | - | - | - | - | - |
| Total Distribution Operation Labor Expense | LBDO | | 0.019707 | 0.016374 | 0.013805 | 0.404335 | 0.015810 | - | - | - |
| Total Distribution Maintenance Labor Expense | LBDM | | 0.003976 | 0.003303 | 0.000027 | 0.000016 | 0.000031 | - | - | - |
| Sub-Total Labor Exp | LBSUB7 | | 0.015670 | 0.013019 | 0.010977 | 0.006528 | 0.012571 | 0.163526 | 0.019526 | - |
| Total General Plant | PGP | | 0.019181 | 0.015936 | 0.013436 | 0.007991 | 0.015388 | - | - | - |
| Total Production Plant | PPRTL | | - | - | - | - | - | - | - | - |
| Total Intangible Plant | PINT | | 0.019181 | 0.015936 | 0.013436 | 0.007991 | 0.015388 | - | - | - |

Exhibit WSS-30

Electric Cost of Service Study

Functional Assignment and

Classification

(Louisville Gas and Electric Company)

LOUISVILLE GAS AND ELECTRIC COMPANY
 Cost of Service Study
 Functional Assignment and Classification

12 Months Ended
 June 30, 2022

| Description | Name | Functional Vector | Total System | Production Demand | Production Energy | Transmission Demand | Distribution Substation | Distribution Primary Lines | | | Distribution Sec. Lines | |
|--|-------|-------------------|------------------|-------------------|-------------------|---------------------|-------------------------|----------------------------|----------------|----------------|-------------------------|----------------|
| | | | | LOLP | Energy | Demand | General | Specific | Demand | Customer | Demand | Customer |
| Plant in Service | | | | | | | | | | | | |
| Intangible Plant | | | | | | | | | | | | |
| 301.00 ORGANIZATION | P301 | PT&D | \$ 2,240 | 1,368 | - | 210 | 83 | - | 127 | 208 | 35 | 60 |
| 302.00 FRANCHISE AND CONSENTS | P301 | PT&D | - | - | - | - | - | - | - | - | - | - |
| 303.00 SOFTWARE - COMMON | P302 | PT&D | - | - | - | - | - | - | - | - | - | - |
| 301.00 ORGANIZATION - COMMON | P301 | PT&D | - | - | - | - | - | - | - | - | - | - |
| 302.00 FRANCHISE AND CONSENTS - COMMON | P301 | PT&D | - | - | - | - | - | - | - | - | - | - |
| Total Intangible Plant | PINT | | \$ 2,240 | \$ 1,368 | \$ - | \$ 210 | \$ 83 | \$ - | \$ 127 | \$ 208 | \$ 35 | \$ 60 |
| Steam Production Plant | | | | | | | | | | | | |
| Total Steam Production Plant | PSTPR | F017 | \$ 3,109,195,352 | 3,109,195,352 | - | - | - | - | - | - | - | - |
| Hydraulic Production Plant | | | | | | | | | | | | |
| Total Hydraulic Production Plant | PHDPR | F017 | \$ 159,587,945 | 159,587,945 | - | - | - | - | - | - | - | - |
| Other Production Plant | | | | | | | | | | | | |
| Total Other Production Plant | POTPR | F017 | \$ 418,289,975 | 418,289,975 | - | - | - | - | - | - | - | - |
| Total Production Plant | PPRTL | | \$ 3,687,073,272 | \$ 3,687,073,272 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Transmission | | | | | | | | | | | | |
| Total Transmission Plant | PTRAN | F011 | \$ 566,296,585 | - | - | 566,296,585 | - | - | - | - | - | - |
| Total Transmission Plant | PTRTL | | \$ 566,296,585 | \$ - | \$ - | \$ 566,296,585 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Distribution | | | | | | | | | | | | |
| TOTAL ACCTS 360-362 | P362 | F001 | \$ 222,802,329 | - | - | - | 222,802,329 | - | - | - | - | - |
| 364 & 365-OVERHEAD LINES | P365 | F003 | 684,235,593 | - | - | - | - | - | 173,756,511 | 308,766,430 | 72,636,726 | 129,075,927 |
| 366 & 367-UNDERGROUND LINES | P367 | F004 | 476,035,911 | - | - | - | - | - | 168,284,874 | 250,959,953 | 22,795,941 | 33,995,143 |
| 368-TRANSFORMERS | P368 | F005 | 182,077,170 | - | - | - | - | - | - | - | - | - |
| 369-SERVICES | P369 | F006 | 41,665,746 | - | - | - | - | - | - | - | - | - |
| 370-METERS | P370 | F007 | 42,308,485 | - | - | - | - | - | - | - | - | - |
| 371-CUSTOMER INSTALLATION | P371 | F007 | 183,388 | - | - | - | - | - | - | - | - | - |
| 373-STREET LIGHTING | P373 | F008 | 137,373,834 | - | - | - | - | - | - | - | - | - |
| 374-ASSET RETIRE OBLIGATIONS DIST PLANT | P374 | F003 | - | - | - | - | - | - | - | - | - | - |
| Total Distribution Plant | PDIST | | \$ 1,786,682,455 | \$ - | \$ - | \$ - | \$ 222,802,329 | \$ - | \$ 342,041,384 | \$ 559,726,383 | \$ 95,432,668 | \$ 163,071,070 |
| Total Prod, Trans, and Dist Plant | PT&D | | \$ 6,040,052,312 | \$ 3,687,073,272 | \$ - | \$ 566,296,585 | \$ 222,802,329 | \$ - | \$ 342,041,384 | \$ 559,726,383 | \$ 95,432,668 | \$ 163,071,070 |

LOUISVILLE GAS AND ELECTRIC COMPANY
 Cost of Service Study
 Functional Assignment and Classification

12 Months Ended
 June 30, 2022

| Description | Name | Functional Vector | Distribution Line Trans. | | Distribution Services | Distribution Meters | Distribution St. & Cust. Lighting | Customer Accounts Expense | Customer Service & Info. | Sales Expense |
|--|-------|-------------------|--------------------------|---------------|-----------------------|---------------------|-----------------------------------|---------------------------|--------------------------|---------------|
| | | | Demand | Customer | Customer | | | | | |
| <u>Plant in Service</u> | | | | | | | | | | |
| <u>Intangible Plant</u> | | | | | | | | | | |
| 301.00 ORGANIZATION | P301 | PT&D | 43 | 24 | 15 | 16 | 51 | - | - | - |
| 302.00 FRANCHISE AND CONSENTS | P301 | PT&D | - | - | - | - | - | - | - | - |
| 303.00 SOFTWARE - COMMON | P302 | PT&D | - | - | - | - | - | - | - | - |
| 301.00 ORGANIZATION - COMMON | P301 | PT&D | - | - | - | - | - | - | - | - |
| 302.00 FRANCHISE AND CONSENTS - COMMON | P301 | PT&D | - | - | - | - | - | - | - | - |
| Total Intangible Plant | PINT | | \$ 43 | \$ 24 | \$ 15 | \$ 16 | \$ 51 | \$ - | \$ - | \$ - |
| <u>Steam Production Plant</u> | | | | | | | | | | |
| Total Steam Production Plant | PSTPR | F017 | - | - | - | - | - | - | - | - |
| <u>Hydraulic Production Plant</u> | | | | | | | | | | |
| Total Hydraulic Production Plant | PHDPR | F017 | - | - | - | - | - | - | - | - |
| <u>Other Production Plant</u> | | | | | | | | | | |
| Total Other Production Plant | POTPR | F017 | - | - | - | - | - | - | - | - |
| Total Production Plant | PPRTL | | \$ - | \$ - | - | - | \$ - | \$ - | \$ - | \$ - |
| <u>Transmission</u> | | | | | | | | | | |
| Total Transmission Plant | PTRAN | F011 | - | - | - | - | - | - | - | - |
| Total Transmission Plant | PTRTL | | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| <u>Distribution</u> | | | | | | | | | | |
| TOTAL ACCTS 360-362 | P362 | F001 | - | - | - | - | - | - | - | - |
| 364 & 365-OVERHEAD LINES | P365 | F003 | - | - | - | - | - | - | - | - |
| 366 & 367-UNDERGROUND LINES | P367 | F004 | - | - | - | - | - | - | - | - |
| 368-TRANSFORMERS | P368 | F005 | 116,910,393 | 65,166,777 | - | - | - | - | - | - |
| 369-SERVICES | P369 | F006 | - | - | 41,665,746 | - | - | - | - | - |
| 370-METERS | P370 | F007 | - | - | - | 42,308,485 | - | - | - | - |
| 371-CUSTOMER INSTALLATION | P371 | F007 | - | - | - | 183,388 | - | - | - | - |
| 373-STREET LIGHTING | P373 | F008 | - | - | - | - | 137,373,834 | - | - | - |
| 374-ASSET RETIRE OBLIGATIONS DIST PLANT | P374 | F003 | - | - | - | - | - | - | - | - |
| Total Distribution Plant | PDIST | | \$ 116,910,393 | \$ 65,166,777 | \$ 41,665,746 | \$ 42,491,872 | \$ 137,373,834 | \$ - | \$ - | \$ - |
| Total Prod, Trans, and Dist Plant | PT&D | | \$ 116,910,393 | \$ 65,166,777 | \$ 41,665,746 | \$ 42,491,872 | \$ 137,373,834 | \$ - | \$ - | \$ - |

LOUISVILLE GAS AND ELECTRIC COMPANY
 Cost of Service Study
 Functional Assignment and Classification

12 Months Ended
 June 30, 2022

| Description | Name | Functional Vector | Total System | Production Demand | Production Energy | Transmission Demand | Distribution Substation | Distribution Primary Lines | | | Distribution Sec. Lines | |
|---|-------|-------------------|------------------|-------------------|-------------------|---------------------|-------------------------|----------------------------|----------------|----------------|-------------------------|----------------|
| | | | | LOLP | Energy | Demand | General | Specific | Demand | Customer | Demand | Customer |
| Plant in Service (Continued) | | | | | | | | | | | | |
| General Plant | | | | | | | | | | | | |
| Total General Plant | PGP | PT&D | \$ 21,026,365 | 12,835,277 | - | 1,971,367 | 775,610 | - | 1,190,699 | 1,948,495 | 332,216 | 567,676 |
| TOTAL COMMON PLANT | PCOM | PT&D | \$ 231,173,767 | 141,117,092 | - | 21,674,136 | 8,527,418 | - | 13,091,111 | 21,422,671 | 3,652,539 | 6,241,296 |
| 106.00 COMPLETED CONSTR NOT CLASSIFIED | P106 | PT&D | - | - | - | - | - | - | - | - | - | - |
| 105.00 PLANT HELD FOR FUTURE USE - DIST | P105 | PDIST | 2,908,740 | - | - | - | 362,725 | - | 556,847 | 911,241 | 155,366 | 265,482 |
| 105.00 PLANT HELD FOR FUTURE USE - PROD | P105 | F017 | 211,410 | 211,410 | - | - | - | - | - | - | - | - |
| PROPERTY HELD UNDER CAPITAL LEASE | | F017 | - | - | - | - | - | - | - | - | - | - |
| OTHER | | PDIST | \$ - | - | - | - | - | - | - | - | - | - |
| Total Plant in Service | TPIS | | \$ 6,295,374,834 | \$ 3,841,238,419 | \$ - | \$ 589,942,298 | \$ 232,468,164 | \$ - | \$ 356,880,169 | \$ 584,008,998 | \$ 99,572,824 | \$ 170,145,583 |
| Construction Work in Progress (CWIP) | | | | | | | | | | | | |
| CWIP Production | CWIP1 | F017 | \$ 17,402,861 | 17,402,861 | - | - | - | - | - | - | - | - |
| CWIP Transmission | CWIP2 | F011 | 21,580,855 | - | - | 21,580,855 | - | - | - | - | - | - |
| CWIP Distribution | CWIP3 | PDIST | 16,836,832 | - | - | - | 2,099,581 | - | 3,223,233 | 5,274,591 | 899,311 | 1,536,703 |
| CWIP General & Common | CWIP4 | PT&D | 11,356,326 | 6,932,325 | - | 1,064,734 | 418,906 | - | 643,096 | 1,052,381 | 179,430 | 306,601 |
| Total Construction Work in Progress | TCWIP | | \$ 67,176,874 | \$ 24,335,186 | \$ - | \$ 22,645,589 | \$ 2,518,488 | \$ - | \$ 3,866,329 | \$ 6,326,972 | \$ 1,078,741 | \$ 1,843,304 |
| Total Utility Plant | | | \$ 6,362,551,708 | \$ 3,865,573,604 | \$ - | \$ 612,587,887 | \$ 234,986,652 | \$ - | \$ 360,746,498 | \$ 590,335,970 | \$ 100,651,565 | \$ 171,988,888 |

LOUISVILLE GAS AND ELECTRIC COMPANY
Cost of Service Study
Functional Assignment and Classification

12 Months Ended
June 30, 2022

| Description | Name | Functional Vector | Distribution Line Trans. | | Distribution Services | Distribution Meters | Distribution St. & Cust. Lighting | Customer Accounts Expense | Customer Service & Info. | Sales Expense |
|--|-------|-------------------|--------------------------|---------------|-----------------------|---------------------|-----------------------------------|---------------------------|--------------------------|---------------|
| | | | Demand | Customer | Customer | | | | | |
| <u>Plant in Service (Continued)</u> | | | | | | | | | | |
| <u>General Plant</u> | | | | | | | | | | |
| Total General Plant | PGP | PT&D | 406,983 | 226,856 | 145,045 | 147,921 | 478,220 | - | - | - |
| TOTAL COMMON PLANT | PCOM | PT&D | 4,474,567 | 2,494,159 | 1,594,693 | 1,626,311 | 5,257,773 | - | - | - |
| 106.00 COMPLETED CONSTR NOT CLASSIFIED | P106 | PT&D | - | - | - | - | - | - | - | - |
| 105.00 PLANT HELD FOR FUTURE USE - DIST | P105 | PDIST | 190,331 | 106,092 | 67,832 | 69,177 | 223,646 | - | - | - |
| 105.00 PLANT HELD FOR FUTURE USE - PROD | P105 | F017 | - | - | - | - | - | - | - | - |
| PROPERTY HELD UNDER CAPITAL LEASE | | F017 | - | - | - | - | - | - | - | - |
| OTHER | | PDIST | - | - | - | - | - | - | - | - |
| Total Plant in Service | TPIS | | \$ 121,982,317 | \$ 67,993,908 | \$ 43,473,331 | \$ 44,335,297 | \$ 143,333,524 | \$ - | \$ - | \$ - |
| <u>Construction Work in Progress (CWIP)</u> | | | | | | | | | | |
| CWIP Production | CWIP1 | F017 | - | - | - | - | - | - | - | - |
| CWIP Transmission | CWIP2 | F011 | - | - | - | - | - | - | - | - |
| CWIP Distribution | CWIP3 | PDIST | 1,101,707 | 614,100 | 392,638 | 400,423 | 1,294,545 | - | - | - |
| CWIP General & Common | CWIP4 | PT&D | 219,811 | 122,525 | 78,339 | 79,892 | 258,286 | - | - | - |
| Total Construction Work in Progress | TCWIP | | \$ 1,321,518 | \$ 736,625 | \$ 470,977 | \$ 480,315 | \$ 1,552,831 | \$ - | \$ - | \$ - |
| Total Utility Plant | | | \$ 123,303,836 | \$ 68,730,533 | \$ 43,944,308 | \$ 44,815,612 | \$ 144,886,355 | \$ - | \$ - | \$ - |

LOUISVILLE GAS AND ELECTRIC COMPANY
 Cost of Service Study
 Functional Assignment and Classification

12 Months Ended
 June 30, 2022

| Description | Name | Functional Vector | Total System | Production Demand | Production Energy | Transmission Demand | Distribution Substation | Distribution Primary Lines | | | Distribution Sec. Lines | |
|--|----------|-------------------|------------------|-------------------|-------------------|---------------------|-------------------------|----------------------------|----------------|----------------|-------------------------|----------------|
| | | | | LOLP | Energy | Demand | General | Specific | Demand | Customer | Demand | Customer |
| Rate Base | | | | | | | | | | | | |
| Utility Plant | | | | | | | | | | | | |
| Plant in Service | | | \$ 6,295,374,834 | \$ 3,841,238,419 | \$ - | \$ 589,942,298 | \$ 232,468,164 | \$ - | \$ 356,880,169 | \$ 584,008,998 | \$ 99,572,824 | \$ 170,145,583 |
| Construction Work in Progress (CWIP) | | | 67,176,874 | 24,335,185.61 | - | 22,645,588.93 | 2,518,487.76 | - | 3,866,328.71 | 6,326,971.77 | 1,078,740.99 | 1,843,304.31 |
| Total Utility Plant | TUP | | \$ 6,362,551,708 | \$ 3,865,573,604 | \$ - | \$ 612,587,887 | \$ 234,986,652 | \$ - | \$ 360,746,498 | \$ 590,335,970 | \$ 100,651,565 | \$ 171,988,888 |
| Less: Accumulated Provision for Depreciation and RWIP | | | | | | | | | | | | |
| Production | ADEPREPA | F017 | \$ 1,306,343,857 | 1,306,343,857 | - | - | - | - | - | - | - | - |
| Transmission | ADEPRTP | PTRAN | 180,532,195 | - | - | 180,532,195 | - | - | - | - | - | - |
| Distribution | ADEPRD11 | PDIST | 585,717,151 | - | - | - | 73,039,921 | - | 112,129,329 | 183,491,667 | 31,285,106 | 53,458,589 |
| General & Common Plant | ADEPRD12 | PT&D | 104,591,141 | 63,846,335 | - | 9,806,141 | 3,858,104 | - | 5,922,879 | 9,692,370 | 1,652,537 | 2,823,782 |
| Intangible Plant | ADEPRGP | PT&D | - | - | - | - | - | - | - | - | - | - |
| RWIP | RWIP | PT&D | - | - | - | - | - | - | - | - | - | - |
| Total Accumulated Depreciation | TADEPR | | \$ 2,177,184,344 | \$ 1,370,190,192 | \$ - | \$ 190,338,336 | \$ 76,898,025 | \$ - | \$ 118,052,208 | \$ 193,184,037 | \$ 32,937,643 | \$ 56,282,370 |
| Net Utility Plant | NTPLANT | | \$ 4,185,367,364 | \$ 2,495,383,413 | \$ - | \$ 422,249,551 | \$ 158,088,627 | \$ - | \$ 242,694,290 | \$ 397,151,933 | \$ 67,713,921 | \$ 115,706,517 |
| Working Capital | | | | | | | | | | | | |
| Cash Working Capital - Operation and Maintenance Expenses | CWC | OMLPP | \$ 124,454,261 | 18,304,703 | 78,365,699 | 7,147,160 | 1,674,372 | - | 2,737,300 | 4,581,334 | 864,546 | 1,497,986 |
| Materials and Supplies | M&S | TPIS | 44,127,133 | 26,924,979 | - | 4,135,173 | 1,629,475 | - | 2,501,535 | 4,093,584 | 697,951 | 1,192,627 |
| Prepayments | PREPAY | TPIS | 14,687,906 | 8,962,095 | - | 1,376,410 | 542,378 | - | 832,647 | 1,362,567 | 232,316 | 396,971 |
| Fuel Stock | | F017 | 33,196,476 | 33,196,476 | - | - | - | - | - | - | - | - |
| Total Working Capital | TWC | | \$ 216,465,777 | \$ 87,388,254 | \$ 78,365,699 | \$ 12,658,743 | \$ 3,846,224 | \$ - | \$ 6,071,481 | \$ 10,037,485 | \$ 1,794,813 | \$ 3,087,585 |
| Deferred Debits | | | | | | | | | | | | |
| Service Pension Cost | PENSCOST | TLB | \$ - | - | - | - | - | - | - | - | - | - |
| Other Deferred Debits | DDEBPP | OMSUB2 | - | - | - | - | - | - | - | - | - | - |
| Total Deferred Debits | | | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Less: Customer Advances | CSTDEP | F027 | \$ 2,369,448 | - | - | - | - | - | 698,500 | 1,143,045 | 194,888 | 333,016 |
| Accumulated Deferred Income Taxes | | | | | | | | | | | | |
| Accumulated Deferred Income Taxes | DIT | TPIS | \$ 939,385,876 | 573,183,522 | - | 88,030,257 | 34,688,532 | - | 53,253,094 | 87,144,899 | 14,858,099 | 25,388,855 |
| FAS 109 Deferred Income Taxes | DIT | TPIS | \$ - | - | - | - | - | - | - | - | - | - |
| Asset Retirement Obligation-Net Assets | DIT | TPIS | \$ - | - | - | - | - | - | - | - | - | - |
| Asset Retirement Obligation-Regulatory Liabilities | DIT | TPIS | \$ - | - | - | - | - | - | - | - | - | - |
| Total Accumulated Deferred Income Tax | | | \$ 939,385,876 | \$ 573,183,522 | \$ - | \$ 88,030,257 | \$ 34,688,532 | \$ - | \$ 53,253,094 | \$ 87,144,899 | \$ 14,858,099 | \$ 25,388,855 |
| Investment Tax Credits | | | | | | | | | | | | |
| Total Production Plant | DIT | F017 | \$ - | - | - | - | - | - | - | - | - | - |
| Total Transmission Plant | DIT | PTRAN | - | - | - | - | - | - | - | - | - | - |
| Total Distribution Plant | DIT | PDIST | - | - | - | - | - | - | - | - | - | - |
| Total General Plant | DIT | PT&D | - | - | - | - | - | - | - | - | - | - |
| Total Investment Tax Credit | | | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Net Rate Base | RB | | \$ 3,460,077,816 | \$ 2,009,588,145 | \$ 78,365,699 | \$ 346,878,037 | \$ 127,246,319 | \$ - | \$ 194,814,177 | \$ 318,901,474 | \$ 54,455,747 | \$ 93,072,232 |

LOUISVILLE GAS AND ELECTRIC COMPANY
Cost of Service Study
Functional Assignment and Classification

12 Months Ended
June 30, 2022

| Description | Name | Functional Vector | Distribution Line Trans. | | Distribution Services | Distribution Meters | Distribution St. & Cust. Lighting | Customer Accounts Expense | Customer Service & Info. | Sales Expense |
|--|----------|-------------------|--------------------------|---------------|-----------------------|---------------------|-----------------------------------|---------------------------|--------------------------|---------------|
| | | | Demand | Customer | Customer | | | | | |
| | | | | | | | | | | |
| Rate Base | | | | | | | | | | |
| Utility Plant | | | | | | | | | | |
| Plant in Service | | | \$ 121,982,317 | \$ 67,993,908 | \$ 43,473,331 | \$ 44,335,297 | \$ 143,333,524 | \$ - | \$ - | \$ - |
| Construction Work in Progress (CWIP) | | | 1,321,518.47 | 736,624.84 | 470,976.54 | 480,314.82 | 1,552,830.80 | - | - | - |
| Total Utility Plant | TUP | | \$ 123,303,836 | \$ 68,730,533 | \$ 43,944,308 | \$ 44,815,612 | \$ 144,886,355 | \$ - | \$ - | \$ - |
| Less: Accumulated Provision for Depreciation and RWIP | | | | | | | | | | |
| Production | ADEPREPA | F017 | - | - | - | - | - | - | - | - |
| Transmission | ADEPRTP | PTRAN | - | - | - | - | - | - | - | - |
| Distribution | ADEPRD11 | PDIST | 38,326,017 | 21,363,225 | 13,659,026 | 13,929,850 | 45,034,421 | - | - | - |
| General & Common Plant | ADEPRD12 | PT&D | 2,024,451 | 1,128,445 | 721,495 | 735,800 | 2,378,802 | - | - | - |
| Intangible Plant | ADEPRGP | PT&D | - | - | - | - | - | - | - | - |
| RWIP | RWIP | PT&D | - | - | - | - | - | - | - | - |
| Total Accumulated Depreciation | TADEPR | | \$ 40,350,468 | \$ 22,491,670 | \$ 14,380,521 | \$ 14,665,650 | \$ 47,413,223 | \$ - | \$ - | \$ - |
| Net Utility Plant | NTPLANT | | \$ 82,953,368 | \$ 46,238,863 | \$ 29,563,787 | \$ 30,149,962 | \$ 97,473,132 | \$ - | \$ - | \$ - |
| Working Capital | | | | | | | | | | |
| Cash Working Capital - Operation and Maintenance Expenses | CWC | OMLPP | 231,637 | 129,116 | 69,036 | 2,886,220 | 347,121 | 4,604,270 | 1,013,761 | - |
| Materials and Supplies | M&S | TPIS | 855,029 | 476,600 | 304,724 | 310,766 | 1,004,690 | - | - | - |
| Prepayments | PREPAY | TPIS | 284,600 | 158,638 | 101,429 | 103,440 | 334,415 | - | - | - |
| Fuel Stock | | F017 | - | - | - | - | - | - | - | - |
| Total Working Capital | TWC | | \$ 1,371,266 | \$ 764,355 | \$ 475,189 | \$ 3,300,426 | \$ 1,686,226 | \$ 4,604,270 | \$ 1,013,761 | \$ - |
| Deferred Debits | | | | | | | | | | |
| Service Pension Cost | PENSCOST | TLB | - | - | - | - | - | - | - | - |
| Other Deferred Debits | DDEBPP | OMSUB2 | - | - | - | - | - | - | - | - |
| Total Deferred Debits | | | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Less: Customer Advances | CSTDEP | F027 | - | - | - | - | - | - | - | - |
| Accumulated Deferred Income Taxes | | | | | | | | | | |
| Accumulated Deferred Income Taxes | DIT | TPIS | 18,202,008 | 10,145,943 | 6,487,022 | 6,615,643 | 21,388,002 | - | - | - |
| FAS 109 Deferred Income Taxes | DIT | TPIS | - | - | - | - | - | - | - | - |
| Asset Retirement Obligation-Net Assets | DIT | TPIS | - | - | - | - | - | - | - | - |
| Asset Retirement Obligation-Regulatory Liabilities | DIT | TPIS | - | - | - | - | - | - | - | - |
| Total Accumulated Deferred Income Tax | | | \$ 18,202,008 | \$ 10,145,943 | \$ 6,487,022 | \$ 6,615,643 | \$ 21,388,002 | \$ - | \$ - | \$ - |
| Investment Tax Credits | | | | | | | | | | |
| Total Production Plant | DIT | F017 | - | - | - | - | - | - | - | - |
| Total Transmission Plant | DIT | PTRAN | - | - | - | - | - | - | - | - |
| Total Distribution Plant | DIT | PDIST | - | - | - | - | - | - | - | - |
| Total General Plant | DIT | PT&D | - | - | - | - | - | - | - | - |
| Total Investment Tax Credit | | | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Net Rate Base | RB | | \$ 66,122,625 | \$ 36,857,274 | \$ 23,551,954 | \$ 26,834,745 | \$ 77,771,357 | \$ 4,604,270 | \$ 1,013,761 | \$ - |

LOUISVILLE GAS AND ELECTRIC COMPANY
 Cost of Service Study
 Functional Assignment and Classification

12 Months Ended
 June 30, 2022

| Description | Name | Functional Vector | Total System | Production Demand | Production Energy | Transmission Demand | Distribution Substation | Distribution Primary Lines | | | Distribution Sec. Lines | |
|---|--------|-------------------|----------------|-------------------|-------------------|---------------------|-------------------------|----------------------------|--------|----------|-------------------------|----------|
| | | | | LOLP | Energy | Demand | General | Specific | Demand | Customer | Demand | Customer |
| Operation and Maintenance Expenses (Continued) | | | | | | | | | | | | |
| Other Power Generation Maintenance Expense | | | | | | | | | | | | |
| 551 MAINTENANCE SUPERVISION & ENGINEERING | OM551 | PROFIX | \$ 272,764 | 272,764 | - | - | - | - | - | - | - | - |
| 552 MAINTENANCE OF STRUCTURES | OM552 | PROFIX | 235,911 | 235,911 | - | - | - | - | - | - | - | - |
| 553 MAINTENANCE OF GENERATING & ELEC PLANT | OM553 | PROFIX | 3,098,761 | 3,098,761 | - | - | - | - | - | - | - | - |
| 554 MAINTENANCE OF MISC OTHER POWER GEN PLT | OM554 | PROFIX | 1,896,209 | 1,896,209 | - | - | - | - | - | - | - | - |
| Total Other Power Generation Maintenance Expense | | | \$ 5,503,645 | \$ 5,503,645 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Total Other Power Generation Expense | | | \$ 51,667,480 | \$ 7,746,034 | \$ 43,921,446 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Total Station Expense | | | \$ 412,365,288 | \$ 55,193,697 | \$ 357,171,590 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Other Power Supply Expenses | | | | | | | | | | | | |
| 555 PURCHASED POWER | OM555 | OMPP | \$ 43,276,671 | 23,686,711 | 19,589,961 | - | - | - | - | - | - | - |
| 555 PURCHASED POWER OPTIONS | OMO555 | OMPP | - | - | - | - | - | - | - | - | - | - |
| 555 BROKERAGE FEES | OMB555 | OMPP | - | - | - | - | - | - | - | - | - | - |
| 555 MISO TRANSMISSION EXPENSES | OMM555 | OMPP | - | - | - | - | - | - | - | - | - | - |
| 556 SYSTEM CONTROL AND LOAD DISPATCH | OM556 | PROFIX | 1,775,597 | 1,775,597 | - | - | - | - | - | - | - | - |
| 557 OTHER EXPENSES | OM557 | PROFIX | 122,949 | 122,949 | - | - | - | - | - | - | - | - |
| 558 DUPLICATE CHARGES | OM558 | Energy | - | - | - | - | - | - | - | - | - | - |
| Total Other Power Supply Expenses | TPP | | \$ 45,175,217 | \$ 25,585,257 | \$ 19,589,961 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Total Electric Power Generation Expenses | | | \$ 457,540,505 | \$ 80,778,954 | \$ 376,761,551 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Transmission Expenses | | | | | | | | | | | | |
| 560 OPERATION SUPERVISION AND ENG | OM560 | LBTRAN | \$ 1,374,229 | - | - | 1,374,229 | - | - | - | - | - | - |
| 561 LOAD DISPATCHING | OM561 | LBTRAN | 2,719,716 | - | - | 2,719,716 | - | - | - | - | - | - |
| 562 STATION EXPENSES | OM562 | LBTRAN | 1,022,714 | - | - | 1,022,714 | - | - | - | - | - | - |
| 563 OVERHEAD LINE EXPENSES | OM563 | LBTRAN | 293,742 | - | - | 293,742 | - | - | - | - | - | - |
| 565 TRANSMISSION OF ELECTRICITY BY OTHERS | OM565 | LBTRAN | 11,844 | - | - | 11,844 | - | - | - | - | - | - |
| 566 MISC. TRANSMISSION EXPENSES | OM566 | PTRAN | 12,977,686 | - | - | 12,977,686 | - | - | - | - | - | - |
| 567 RENTS | OM567 | PTRAN | 61,385 | - | - | 61,385 | - | - | - | - | - | - |
| 568 MAINTENACE SUPERVISION AND ENG | OM568 | LBTRAN | - | - | - | - | - | - | - | - | - | - |
| 569 STRUCTURES | OM569 | LBTRAN | - | - | - | - | - | - | - | - | - | - |
| 570 MAINT OF STATION EQUIPMENT | OM570 | LBTRAN | 1,720,071 | - | - | 1,720,071 | - | - | - | - | - | - |
| 571 MAINT OF OVERHEAD LINES | OM571 | LBTRAN | 7,356,001 | - | - | 7,356,001 | - | - | - | - | - | - |
| 572 UNDERGROUND LINES | OM572 | LBTRAN | - | - | - | - | - | - | - | - | - | - |
| 573 MISC PLANT | OM573 | PTRAN | 236,185 | - | - | 236,185 | - | - | - | - | - | - |
| 575 MISO DAY 1 & 2 EXPENSES | OM575 | LBTRAN | - | - | - | - | - | - | - | - | - | - |
| Total Transmission Expenses | | | \$ 27,773,573 | \$ - | \$ - | \$ 27,773,573 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |

LOUISVILLE GAS AND ELECTRIC COMPANY
 Cost of Service Study
 Functional Assignment and Classification

12 Months Ended
 June 30, 2022

| Description | Name | Functional Vector | Total System | Production Demand | Production Energy | Transmission Demand | Distribution Substation | Distribution Primary Lines | | | Distribution Sec. Lines | |
|---|--------|-------------------|----------------|-------------------|-------------------|---------------------|-------------------------|----------------------------|---------------|---------------|-------------------------|--------------|
| | | | | LOLP | Energy | Demand | General | Specific | Demand | Customer | Demand | Customer |
| Operation and Maintenance Expenses (Continued) | | | | | | | | | | | | |
| Distribution Operation Expense | | | | | | | | | | | | |
| 580 OPERATION SUPERVISION AND ENGI | OM580 | LBDO | \$ 2,397,039 | - | - | - | 355,547 | - | 283,565 | 481,036 | 95,932 | 167,375 |
| 581 LOAD DISPATCHING | OM581 | P362 | 292,953 | - | - | - | 292,953 | - | - | - | - | - |
| 582 STATION EXPENSES | OM582 | P362 | 1,764,640 | - | - | - | 1,764,640 | - | - | - | - | - |
| 583 OVERHEAD LINE EXPENSES | OM583 | P365 | 5,783,700 | - | - | - | - | - | 1,468,727 | 2,609,938 | 613,983 | 1,091,052 |
| 584 UNDERGROUND LINE EXPENSES | OM584 | P367 | 6,320,821 | - | - | - | - | - | 2,234,492 | 3,332,255 | 302,685 | 451,389 |
| 585 STREET LIGHTING EXPENSE | OM585 | P373 | - | - | - | - | - | - | - | - | - | - |
| 586 METER EXPENSES | OM586 | P370 | 7,932,375 | - | - | - | - | - | - | - | - | - |
| 586 METER EXPENSES - LOAD MANAGEMENT | OM586x | F012 | - | - | - | - | - | - | - | - | - | - |
| 587 CUSTOMER INSTALLATIONS EXPENSE | OM587 | PDIST | - | - | - | - | - | - | - | - | - | - |
| 588 MISCELLANEOUS DISTRIBUTION EXP | OM588 | PDIST | 7,395,817 | - | - | - | 922,271 | - | 1,415,851 | 2,316,939 | 395,035 | 675,019 |
| 588 MISC DISTR EXP - MAPPIN | OM588x | PDIST | - | - | - | - | - | - | - | - | - | - |
| 589 RENTS | OM589 | PDIST | 35,725 | - | - | - | 4,455 | - | 6,839 | 11,192 | 1,908 | 3,261 |
| Total Distribution Operation Expense | OMDO | | \$ 31,923,070 | \$ - | \$ - | \$ - | \$ 3,339,866 | \$ - | \$ 5,409,474 | \$ 8,751,359 | \$ 1,409,543 | \$ 2,388,094 |
| Distribution Maintenance Expense | | | | | | | | | | | | |
| 590 MAINTENANCE SUPERVISION AND EN | OM590 | LBDM | \$ 47,090 | - | - | - | 6,498 | - | 11,032 | 18,519 | 3,538 | 6,141 |
| 591 STRUCTURES | OM591 | P362 | - | - | - | - | - | - | - | - | - | - |
| 592 MAINTENANCE OF STATION EQUIPME | OM592 | P362 | 1,865,977 | - | - | - | 1,865,977 | - | - | - | - | - |
| 593 MAINTENANCE OF OVERHEAD LINES | OM593 | P365 | 15,769,154 | - | - | - | - | - | 4,004,459 | 7,115,949 | 1,674,014 | 2,974,733 |
| 594 MAINTENANCE OF UNDERGROUND LIN | OM594 | P367 | 1,854,313 | - | - | - | - | - | 655,524 | 977,570 | 88,798 | 132,422 |
| 595 MAINTENANCE OF LINE TRANSFORME | OM595 | P368 | 185,535 | - | - | - | - | - | - | - | - | - |
| 596 MAINTENANCE OF ST LIGHTS & SIG SYSTEMS | OM596 | P373 | 568,134 | - | - | - | - | - | - | - | - | - |
| 597 MAINTENANCE OF METERS | OM597 | P370 | - | - | - | - | - | - | - | - | - | - |
| 598 MISCELLANEOUS DISTRIBUTION EXPENSES | OM598 | PDIST | 870,332 | - | - | - | 108,532 | - | 166,616 | 272,655 | 46,487 | 79,435 |
| Total Distribution Maintenance Expense | OMDM | | \$ 21,160,535 | \$ - | \$ - | \$ - | \$ 1,981,006 | \$ - | \$ 4,837,630 | \$ 8,384,692 | \$ 1,812,837 | \$ 3,192,731 |
| Total Distribution Operation and Maintenance Expenses | | | \$ 53,083,605 | - | - | - | 5,320,872 | - | 10,247,105 | 17,136,051 | 3,222,380 | 5,580,825 |
| Transmission and Distribution Expenses | | | \$ 80,857,178 | - | - | 27,773,573 | 5,320,872 | - | 10,247,105 | 17,136,051 | 3,222,380 | 5,580,825 |
| Production, Transmission and Distribution Expenses | OMSUB | | \$ 538,397,683 | \$ 80,778,954 | \$ 376,761,551 | \$ 27,773,573 | \$ 5,320,872 | \$ - | \$ 10,247,105 | \$ 17,136,051 | \$ 3,222,380 | \$ 5,580,825 |

LOUISVILLE GAS AND ELECTRIC COMPANY
 Cost of Service Study
 Functional Assignment and Classification

12 Months Ended
 June 30, 2022

| Description | Name | Functional Vector | Distribution Line Trans. | | Distribution Services | Distribution Meters | Distribution St. & Cust. Lighting | Customer Accounts Expense | Customer Service & Info. | Sales Expense |
|---|--------|-------------------|--------------------------|------------|-----------------------|---------------------|-----------------------------------|---------------------------|--------------------------|---------------|
| | | | Demand | Customer | Customer | | | | | |
| Operation and Maintenance Expenses (Continued) | | | | | | | | | | |
| Distribution Operation Expense | | | | | | | | | | |
| 580 OPERATION SUPERVISION AND ENGI | OM580 | LBDO | 28,597 | 15,940 | 10,192 | 925,254 | 33,602 | - | - | - |
| 581 LOAD DISPATCHING | OM581 | P362 | - | - | - | - | - | - | - | - |
| 582 STATION EXPENSES | OM582 | P362 | - | - | - | - | - | - | - | - |
| 583 OVERHEAD LINE EXPENSES | OM583 | P365 | - | - | - | - | - | - | - | - |
| 584 UNDERGROUND LINE EXPENSES | OM584 | P367 | - | - | - | - | - | - | - | - |
| 585 STREET LIGHTING EXPENSE | OM585 | P373 | - | - | - | - | - | - | - | - |
| 586 METER EXPENSES | OM586 | P370 | - | - | - | 7,932,375 | - | - | - | - |
| 586 METER EXPENSES - LOAD MANAGEMENT | OM586x | F012 | - | - | - | - | - | - | - | - |
| 587 CUSTOMER INSTALLATIONS EXPENSE | OM587 | PDIST | - | - | - | - | - | - | - | - |
| 588 MISCELLANEOUS DISTRIBUTION EXP | OM588 | PDIST | 483,940 | 269,752 | 172,472 | 175,891 | 568,647 | - | - | - |
| 588 MISC DISTR EXP - MAPPIN | OM588x | PDIST | - | - | - | - | - | - | - | - |
| 589 RENTS | OM589 | PDIST | 2,338 | 1,303 | 833 | 850 | 2,747 | - | - | - |
| Total Distribution Operation Expense | OMDO | | \$ 514,875 | \$ 286,995 | \$ 183,497 | \$ 9,034,370 | \$ 604,996 | \$ - | \$ - | \$ - |
| Distribution Maintenance Expense | | | | | | | | | | |
| 590 MAINTENANCE SUPERVISION AND ENI | OM590 | LBDM | 808 | 451 | - | - | 104 | - | - | - |
| 591 STRUCTURES | OM591 | P362 | - | - | - | - | - | - | - | - |
| 592 MAINTENANCE OF STATION EQUIPME | OM592 | P362 | - | - | - | - | - | - | - | - |
| 593 MAINTENANCE OF OVERHEAD LINES | OM593 | P365 | - | - | - | - | - | - | - | - |
| 594 MAINTENANCE OF UNDERGROUND LIN | OM594 | P367 | - | - | - | - | - | - | - | - |
| 595 MAINTENANCE OF LINE TRANSFORME | OM595 | P368 | 119,131 | 66,404 | - | - | - | - | - | - |
| 596 MAINTENANCE OF ST LIGHTS & SIG SYSTEMS | OM596 | P373 | - | - | - | - | 568,134 | - | - | - |
| 597 MAINTENANCE OF METERS | OM597 | P370 | - | - | - | - | - | - | - | - |
| 598 MISCELLANEOUS DISTRIBUTION EXPENSES | OM598 | PDIST | 56,950 | 31,744 | 20,296 | 20,699 | 66,918 | - | - | - |
| Total Distribution Maintenance Expense | OMDM | | \$ 176,889 | \$ 98,599 | \$ 20,296 | \$ 20,699 | \$ 635,155 | \$ - | \$ - | \$ - |
| Total Distribution Operation and Maintenance Expenses | | | 691,764 | 385,595 | 203,793 | 9,055,069 | 1,240,152 | - | - | - |
| Transmission and Distribution Expenses | | | 691,764 | 385,595 | 203,793 | 9,055,069 | 1,240,152 | - | - | - |
| Production, Transmission and Distribution Expenses | OMSUB | | \$ 691,764 | \$ 385,595 | \$ 203,793 | \$ 9,055,069 | \$ 1,240,152 | \$ - | \$ - | \$ - |

LOUISVILLE GAS AND ELECTRIC COMPANY
 Cost of Service Study
 Functional Assignment and Classification

12 Months Ended
 June 30, 2022

| Description | Name | Functional Vector | Total System | Production Demand | Production Energy | Transmission Demand | Distribution Substation | Distribution Primary Lines | | | Distribution Sec. Lines | |
|---|--------|-------------------|---------------|-------------------|-------------------|---------------------|-------------------------|----------------------------|------------|------------|-------------------------|-----------|
| | | | | LOLP | Energy | Demand | General | Specific | Demand | Customer | Demand | Customer |
| Operation and Maintenance Expenses (Continued) | | | | | | | | | | | | |
| Customer Accounts Expense | | | | | | | | | | | | |
| 901 SUPERVISION/CUSTOMER ACCTS | OM901 | F025 | \$ 1,498,909 | - | - | - | - | - | - | - | - | - |
| 902 METER READING EXPENSES | OM902 | F025 | 3,820,562 | - | - | - | - | - | - | - | - | - |
| 903 RECORDS AND COLLECTION | OM903 | F025 | 7,929,806 | - | - | - | - | - | - | - | - | - |
| 904 UNCOLLECTIBLE ACCOUNTS | OM904 | F025 | 2,225,668 | - | - | - | - | - | - | - | - | - |
| 905 MISC CUST ACCOUNTS | OM903 | F025 | - | - | - | - | - | - | - | - | - | - |
| Total Customer Accounts Expense | OMCA | | \$ 15,474,945 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Customer Service Expense | | | | | | | | | | | | |
| 907 SUPERVISION | OM907 | F026 | \$ 199,518 | - | - | - | - | - | - | - | - | - |
| 908 CUSTOMER ASSISTANCE EXPENSES | OM908 | F026 | 821,366 | - | - | - | - | - | - | - | - | - |
| 908 CUSTOMER ASSISTANCE EXP-INCENTIVES | OM908x | F026 | - | - | - | - | - | - | - | - | - | - |
| 909 INFORMATIONAL AND INSTRUCTIONA | OM909 | F026 | 1,201,025 | - | - | - | - | - | - | - | - | - |
| 909 INFORM AND INSTRUC -LOAD MGMT | OM909x | F026 | - | - | - | - | - | - | - | - | - | - |
| 910 MISCELLANEOUS CUSTOMER SERVICE | OM910 | F026 | 1,144,803 | - | - | - | - | - | - | - | - | - |
| 911 DEMONSTRATION AND SELLING EXP | OM911 | F026 | - | - | - | - | - | - | - | - | - | - |
| 912 DEMONSTRATION AND SELLING EXP | OM912 | F026 | 56,160 | - | - | - | - | - | - | - | - | - |
| 913 ADVERTISING EXPENSES | OM913 | F026 | - | - | - | - | - | - | - | - | - | - |
| 916 MISC SALES EXPENSE | OM916 | F026 | - | - | - | - | - | - | - | - | - | - |
| Total Customer Service Expense | OMCS | | \$ 3,422,872 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Sub-Total Prod, Trans, Dist, Cust Acct and Cust Service | OMSUB2 | | 557,295,500 | 80,778,954 | 376,761,551 | 27,773,573 | 5,320,872 | - | 10,247,105 | 17,136,051 | 3,222,380 | 5,580,825 |

LOUISVILLE GAS AND ELECTRIC COMPANY
 Cost of Service Study
 Functional Assignment and Classification

12 Months Ended
 June 30, 2022

| Description | Name | Functional Vector | Distribution Line Trans. | | Distribution Services | Distribution Meters | Distribution St. & Cust. Lighting | Customer Accounts Expense | Customer Service & Info. | Sales Expense |
|---|--------|-------------------|--------------------------|----------|-----------------------|---------------------|-----------------------------------|---------------------------|--------------------------|---------------|
| | | | Demand | Customer | Customer | | | | | |
| | | | | | | | | | | |
| Operation and Maintenance Expenses (Continued) | | | | | | | | | | |
| Customer Accounts Expense | | | | | | | | | | |
| 901 SUPERVISION/CUSTOMER ACCTS | OM901 | F025 | - | - | - | - | - | 1,498,909 | - | - |
| 902 METER READING EXPENSES | OM902 | F025 | - | - | - | - | - | 3,820,562 | - | - |
| 903 RECORDS AND COLLECTION | OM903 | F025 | - | - | - | - | - | 7,929,806 | - | - |
| 904 UNCOLLECTIBLE ACCOUNTS | OM904 | F025 | - | - | - | - | - | 2,225,668 | - | - |
| 905 MISC CUST ACCOUNTS | OM903 | F025 | - | - | - | - | - | - | - | - |
| Total Customer Accounts Expense | OMCA | | \$ - | \$ - | \$ - | \$ - | \$ - | \$ 15,474,945 | \$ - | \$ - |
| Customer Service Expense | | | | | | | | | | |
| 907 SUPERVISION | OM907 | F026 | - | - | - | - | - | - | 199,518 | - |
| 908 CUSTOMER ASSISTANCE EXPENSES | OM908 | F026 | - | - | - | - | - | - | 821,366 | - |
| 908 CUSTOMER ASSISTANCE EXP-INCENTIVES | OM908x | F026 | - | - | - | - | - | - | - | - |
| 909 INFORMATIONAL AND INSTRUCTIONA | OM909 | F026 | - | - | - | - | - | - | 1,201,025 | - |
| 909 INFORM AND INSTRUC -LOAD MGMT | OM909x | F026 | - | - | - | - | - | - | - | - |
| 910 MISCELLANEOUS CUSTOMER SERVICE | OM910 | F026 | - | - | - | - | - | - | 1,144,803 | - |
| 911 DEMONSTRATION AND SELLING EXP | OM911 | F026 | - | - | - | - | - | - | - | - |
| 912 DEMONSTRATION AND SELLING EXP | OM912 | F026 | - | - | - | - | - | - | 56,160 | - |
| 913 ADVERTISING EXPENSES | OM913 | F026 | - | - | - | - | - | - | - | - |
| 916 MISC SALES EXPENSE | OM916 | F026 | - | - | - | - | - | - | - | - |
| Total Customer Service Expense | OMCS | | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ 3,422,872 | \$ - |
| Sub-Total Prod, Trans, Dist, Cust Acct and Cust Service | OMSUB2 | | 691,764 | 385,595 | 203,793 | 9,055,069 | 1,240,152 | 15,474,945 | 3,422,872 | - |

LOUISVILLE GAS AND ELECTRIC COMPANY
 Cost of Service Study
 Functional Assignment and Classification

12 Months Ended
 June 30, 2022

| Description | Name | Functional Vector | Total System | Production Demand | Production Energy | Transmission Demand | Distribution Substation | Distribution Primary Lines | | | Distribution Sec. Lines | |
|--|-------|-------------------|----------------|-------------------|-------------------|---------------------|-------------------------|----------------------------|---------------|---------------|-------------------------|--------------|
| | | | | LOLP | Energy | Demand | General | Specific | Demand | Customer | Demand | Customer |
| Operation and Maintenance Expenses (Continued) | | | | | | | | | | | | |
| Administrative and General Expense | | | | | | | | | | | | |
| 920 ADMIN. & GEN. SALARIES- | OM920 | LBSUB7 | \$ 25,891,027 | 8,431,182 | 7,150,540 | 1,943,054 | 808,693 | - | 802,104 | 1,355,414 | 266,150 | 463,477 |
| 921 OFFICE SUPPLIES AND EXPENSES | OM921 | LBSUB7 | 7,802,685 | 2,540,875 | 2,154,932 | 585,571 | 243,713 | - | 241,727 | 408,476 | 80,209 | 139,676 |
| 922 ADMINISTRATIVE EXPENSES TRANSFERRED | OM922 | LBSUB7 | (5,240,118) | (1,706,398) | (1,447,207) | (393,257) | (163,672) | - | (162,339) | (274,324) | (53,866) | (93,804) |
| 923 OUTSIDE SERVICES EMPLOYED | OM923 | LBSUB7 | 17,066,021 | 5,557,397 | 4,713,264 | 1,280,760 | 533,049 | - | 528,706 | 893,419 | 175,432 | 305,500 |
| 924 PROPERTY INSURANCE | OM924 | TUP | 7,218,578 | 4,385,653 | - | 695,006 | 266,602 | - | 409,282 | 669,761 | 114,193 | 195,128 |
| 925 INJURIES AND DAMAGES | OM925 | LBSUB7 | 3,235,548 | 1,053,627 | 893,588 | 242,819 | 101,061 | - | 100,237 | 169,383 | 33,260 | 57,920 |
| 926 EMPLOYEE BENEFITS | OM926 | LBSUB7 | 23,981,335 | 7,809,308 | 6,623,124 | 1,799,737 | 749,045 | - | 742,942 | 1,255,440 | 246,519 | 429,291 |
| 927 FRANCHISE REQUIREMENTS | OM927 | TUP | - | - | - | - | - | - | - | - | - | - |
| 928 REGULATORY COMMISSION FEES | OM928 | TUP | 984,809 | 598,322 | - | 94,818 | 36,372 | - | 55,837 | 91,373 | 15,579 | 26,621 |
| 929 DUPLICATE CHARGES-CR | OM929 | LBSUB7 | (216,193) | (70,401) | (59,708) | (16,225) | (6,753) | - | (6,698) | (11,318) | (2,222) | (3,870) |
| 930 MISCELLANEOUS GENERAL EXPENSES | OM930 | LBSUB7 | 2,554,270 | 831,775 | 705,434 | 191,691 | 79,781 | - | 79,131 | 133,718 | 26,257 | 45,724 |
| 931 RENTS AND LEASES | OM931 | PGP | 1,807,941 | 1,103,635 | - | 169,507 | 66,690 | - | 102,382 | 167,540 | 28,565 | 48,811 |
| 935 MAINTENANCE OF GENERAL PLANT | OM935 | PGP | 1,055,259 | 644,170 | - | 98,938 | 38,926 | - | 59,758 | 97,790 | 16,673 | 28,490 |
| Total Administrative and General Expense | OMAG | | \$ 86,141,161 | \$ 31,179,144 | \$ 20,733,968 | \$ 6,692,420 | \$ 2,753,507 | \$ - | \$ 2,953,070 | \$ 4,956,673 | \$ 946,748 | \$ 1,642,966 |
| Total Operation and Maintenance Expenses | TOM | | \$ 643,436,661 | \$ 111,958,098 | \$ 397,495,519 | \$ 34,465,993 | \$ 8,074,379 | \$ - | \$ 13,200,175 | \$ 22,092,724 | \$ 4,169,129 | \$ 7,223,791 |
| Operation and Maintenance Expenses Less Purchase Power | OMLPP | | \$ 600,159,990 | \$ 88,271,387 | \$ 377,905,558 | \$ 34,465,993 | \$ 8,074,379 | \$ - | \$ 13,200,175 | \$ 22,092,724 | \$ 4,169,129 | \$ 7,223,791 |

LOUISVILLE GAS AND ELECTRIC COMPANY

Cost of Service Study
Functional Assignment and Classification

12 Months Ended
June 30, 2022

| Description | Name | Functional Vector | Distribution Line Trans. | | Distribution Services | Distribution Meters | Distribution St. & Cust. Lighting | Customer Accounts Expense | Customer Service & Info. | Sales Expense |
|--|-------|-------------------|--------------------------|------------|-----------------------|---------------------|-----------------------------------|---------------------------|--------------------------|---------------|
| | | | Demand | Customer | Customer | | | | | |
| Operation and Maintenance Expenses (Continued) | | | | | | | | | | |
| Administrative and General Expense | | | | | | | | | | |
| 920 ADMIN. & GEN. SALARIES- | OM920 | LBSUB7 | 72,722 | 40,536 | 18,178 | 1,650,318 | 62,718 | 2,320,423 | 505,519 | - |
| 921 OFFICE SUPPLIES AND EXPENSES | OM921 | LBSUB7 | 21,916 | 12,216 | 5,478 | 497,350 | 18,901 | 699,297 | 152,346 | - |
| 922 ADMINISTRATIVE EXPENSES TRANSFERRED | OM922 | LBSUB7 | (14,718) | (8,204) | (3,679) | (334,010) | (12,694) | (469,633) | (102,313) | - |
| 923 OUTSIDE SERVICES EMPLOYED | OM923 | LBSUB7 | 47,935 | 26,719 | 11,982 | 1,087,804 | 41,340 | 1,529,502 | 333,212 | - |
| 924 PROPERTY INSURANCE | OM924 | TUP | 139,893 | 77,978 | 49,857 | 50,845 | 164,380 | - | - | - |
| 925 INJURIES AND DAMAGES | OM925 | LBSUB7 | 9,088 | 5,066 | 2,272 | 206,237 | 7,838 | 289,978 | 63,174 | - |
| 926 EMPLOYEE BENEFITS | OM926 | LBSUB7 | 67,358 | 37,546 | 16,837 | 1,528,592 | 58,092 | 2,149,271 | 468,232 | - |
| 927 FRANCHISE REQUIREMENTS | OM927 | TUP | - | - | - | - | - | - | - | - |
| 928 REGULATORY COMMISSION FEES | OM928 | TUP | 19,085 | 10,638 | 6,802 | 6,937 | 22,426 | - | - | - |
| 929 DUPLICATE CHARGES-CR | OM929 | LBSUB7 | (607) | (338) | (152) | (13,780) | (524) | (19,376) | (4,221) | - |
| 930 MISCELLANEOUS GENERAL EXPENSES | OM930 | LBSUB7 | 7,174 | 3,999 | 1,793 | 162,811 | 6,187 | 228,920 | 49,872 | - |
| 931 RENTS AND LEASES | OM931 | PGP | 34,994 | 19,506 | 12,472 | 12,719 | 41,119 | - | - | - |
| 935 MAINTENANCE OF GENERAL PLANT | OM935 | PGP | 20,425 | 11,385 | 7,279 | 7,424 | 24,001 | - | - | - |
| Total Administrative and General Expense | OMAG | | \$ 425,266 | \$ 237,046 | \$ 129,120 | \$ 4,863,247 | \$ 433,784 | \$ 6,728,383 | \$ 1,465,821 | \$ - |
| Total Operation and Maintenance Expenses | TOM | | \$ 1,117,029 | \$ 622,641 | \$ 332,913 | \$ 13,918,315 | \$ 1,673,935 | \$ 22,203,328 | \$ 4,888,693 | \$ - |
| Operation and Maintenance Expenses Less Purchase Power | OMLPP | | \$ 1,117,029 | \$ 622,641 | \$ 332,913 | \$ 13,918,315 | \$ 1,673,935 | \$ 22,203,328 | \$ 4,888,693 | \$ - |
| | | | | | | \$ 70,751,095 | | | | |

LOUISVILLE GAS AND ELECTRIC COMPANY
 Cost of Service Study
 Functional Assignment and Classification

12 Months Ended
 June 30, 2022

| Description | Name | Functional Vector | Total System | Production Demand | Production Energy | Transmission Demand | Distribution Substation | Distribution Primary Lines | | | Distribution Sec. Lines | |
|---|--------|-------------------|--------------|-------------------|-------------------|---------------------|-------------------------|----------------------------|--------------|--------------|-------------------------|------------|
| | | | | LOLP | Energy | Demand | General | Specific | Demand | Customer | Demand | Customer |
| Labor Expenses (Continued) | | | | | | | | | | | | |
| Transmission Labor Expenses | | | | | | | | | | | | |
| 560 OPERATION SUPERVISION AND ENG | LB560 | PTRAN | \$ 884,644 | - | - | 884,644 | - | - | - | - | - | - |
| 561 LOAD DISPATCHING | LB561 | PTRAN | 1,915,335 | - | - | 1,915,335 | - | - | - | - | - | - |
| 562 STATION EXPENSES | LB562 | PTRAN | 390,519 | - | - | 390,519 | - | - | - | - | - | - |
| 563 OVERHEAD LINE EXPENSES | LB563 | PTRAN | 12,872 | - | - | 12,872 | - | - | - | - | - | - |
| 566 MISC. TRANSMISSION EXPENSES | LB566 | PTRAN | 110,681 | - | - | 110,681 | - | - | - | - | - | - |
| 569 MAINTENACE OF STRUCTURES | LB569 | PTRAN | - | - | - | - | - | - | - | - | - | - |
| 570 MAINT OF STATION EQUIPMENT | LB570 | PTRAN | 687,585 | - | - | 687,585 | - | - | - | - | - | - |
| 571 MAINT OF OVERHEAD LINES | LB571 | PTRAN | 170,496 | - | - | 170,496 | - | - | - | - | - | - |
| 573 MAINT OF MISC. TRANSMISSION PLANT | LB573 | PTRAN | - | - | - | - | - | - | - | - | - | - |
| Total Transmission Labor Expenses | LBTRAN | | \$ 4,172,132 | \$ - | \$ - | \$ 4,172,132 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Distribution Operation Labor Expense | | | | | | | | | | | | |
| 580 OPERATION SUPERVISION AND ENGI | LB580 | F023 | \$ 951,702 | - | - | - | 141,164 | - | 112,584 | 190,987 | 38,088 | 66,453 |
| 581 LOAD DISPATCHING | LB581 | P362 | 147,043 | - | - | - | 147,043 | - | - | - | - | - |
| 582 STATION EXPENSES | LB582 | P362 | 886,395 | - | - | - | 886,395 | - | - | - | - | - |
| 583 OVERHEAD LINE EXPENSES | LB583 | P365 | 2,177,118 | - | - | - | - | - | 552,863 | 982,441 | 231,117 | 410,697 |
| 584 UNDERGROUND LINE EXPENSES | LB584 | P367 | 377,223 | - | - | - | - | - | 133,353 | 198,867 | 18,064 | 26,939 |
| 585 STREET LIGHTING EXPENSE | LB585 | P373 | - | - | - | - | - | - | - | - | - | - |
| 586 METER EXPENSES | LB586 | P370 | 3,140,532 | - | - | - | - | - | - | - | - | - |
| 586 METER EXPENSES - LOAD MANAGEMENT | LB586x | F012 | - | - | - | - | - | - | - | - | - | - |
| 587 CUSTOMER INSTALLATIONS EXPENSE | LB587 | P371 | - | - | - | - | - | - | - | - | - | - |
| 588 MISCELLANEOUS DISTRIBUTION EXP | LB588 | PDIST | 1,500,244 | - | - | - | 187,083 | - | 287,206 | 469,992 | 80,133 | 136,928 |
| 589 RENTS | LB589 | PDIST | - | - | - | - | - | - | - | - | - | - |
| Total Distribution Operation Labor Expense | LBDO | | \$ 9,180,257 | \$ - | \$ - | \$ - | \$ 1,361,685 | \$ - | \$ 1,086,006 | \$ 1,842,286 | \$ 367,402 | \$ 641,017 |

LOUISVILLE GAS AND ELECTRIC COMPANY
 Cost of Service Study
 Functional Assignment and Classification

12 Months Ended
 June 30, 2022

| Description | Name | Functional Vector | Distribution Line Trans. | | Distribution Services | Distribution Meters | Distribution St. & Cust. Lighting | Customer Accounts Expense | Customer Service & Info. | Sales Expense |
|---|--------|-------------------|--------------------------|-----------|-----------------------|---------------------|-----------------------------------|---------------------------|--------------------------|---------------|
| | | | Demand | Customer | Customer | | | | | |
| | | | | | | | | | | |
| Labor Expenses (Continued) | | | | | | | | | | |
| Transmission Labor Expenses | | | | | | | | | | |
| 560 OPERATION SUPERVISION AND ENG | LB560 | PTRAN | - | - | - | - | - | - | - | - |
| 561 LOAD DISPATCHING | LB561 | PTRAN | - | - | - | - | - | - | - | - |
| 562 STATION EXPENSES | LB562 | PTRAN | - | - | - | - | - | - | - | - |
| 563 OVERHEAD LINE EXPENSES | LB563 | PTRAN | - | - | - | - | - | - | - | - |
| 566 MISC. TRANSMISSION EXPENSES | LB566 | PTRAN | - | - | - | - | - | - | - | - |
| 569 MAINTENACE OF STRUCTURES | LB569 | PTRAN | - | - | - | - | - | - | - | - |
| 570 MAINT OF STATION EQUIPMENT | LB570 | PTRAN | - | - | - | - | - | - | - | - |
| 571 MAINT OF OVERHEAD LINES | LB571 | PTRAN | - | - | - | - | - | - | - | - |
| 573 MAINT OF MISC. TRANSMISSION PLANT | LB573 | PTRAN | - | - | - | - | - | - | - | - |
| Total Transmission Labor Expenses | LBTRAN | | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Distribution Operation Labor Expense | | | | | | | | | | |
| 580 OPERATION SUPERVISION AND ENGI | LB580 | F023 | 11,354 | 6,329 | 4,046 | 367,356 | 13,341 | - | - | - |
| 581 LOAD DISPATCHING | LB581 | P362 | - | - | - | - | - | - | - | - |
| 582 STATION EXPENSES | LB582 | P362 | - | - | - | - | - | - | - | - |
| 583 OVERHEAD LINE EXPENSES | LB583 | P365 | - | - | - | - | - | - | - | - |
| 584 UNDERGROUND LINE EXPENSES | LB584 | P367 | - | - | - | - | - | - | - | - |
| 585 STREET LIGHTING EXPENSE | LB585 | P373 | - | - | - | - | - | - | - | - |
| 586 METER EXPENSES | LB586 | P370 | - | - | - | 3,140,532 | - | - | - | - |
| 586 METER EXPENSES - LOAD MANAGEMENT | LB586x | F012 | - | - | - | - | - | - | - | - |
| 587 CUSTOMER INSTALLATIONS EXPENSE | LB587 | P371 | - | - | - | - | - | - | - | - |
| 588 MISCELLANEOUS DISTRIBUTION EXP | LB588 | PDIST | 98,167 | 54,719 | 34,986 | 35,680 | 115,350 | - | - | - |
| 589 RENTS | LB589 | PDIST | - | - | - | - | - | - | - | - |
| Total Distribution Operation Labor Expense | LBDO | | \$ 109,521 | \$ 61,048 | \$ 39,032 | \$ 3,543,567 | \$ 128,691 | \$ - | \$ - | \$ - |

LOUISVILLE GAS AND ELECTRIC COMPANY
 Cost of Service Study
 Functional Assignment and Classification

12 Months Ended
 June 30, 2022

| Description | Name | Functional Vector | Total System | Production Demand | Production Energy | Transmission Demand | Distribution Substation | Distribution Primary Lines | | | Distribution Sec. Lines | |
|---|--------|-------------------|---------------|-------------------|-------------------|---------------------|-------------------------|----------------------------|--------------|--------------|-------------------------|------------|
| | | | | LOLP | Energy | Demand | General | Specific | Demand | Customer | Demand | Customer |
| Labor Expenses (Continued) | | | | | | | | | | | | |
| Distribution Maintenance Labor Expense | | | | | | | | | | | | |
| 590 MAINTENANCE SUPERVISION AND EN | LB590 | F024 | \$ - | - | - | - | - | - | - | - | - | - |
| 591 MAINTENANCE OF STRUCTURES | LB591 | P362 | - | - | - | - | - | - | - | - | - | - |
| 592 MAINTENANCE OF STATION EQUIPME | LB592 | P362 | 374,744 | - | - | - | 374,744 | - | - | - | - | - |
| 593 MAINTENANCE OF OVERHEAD LINES | LB593 | P365 | 1,642,806 | - | - | - | - | - | 417,178 | 741,328 | 174,396 | 309,903 |
| 594 MAINTENANCE OF UNDERGROUND LIN | LB594 | P367 | 619,769 | - | - | - | - | - | 219,096 | 326,734 | 29,679 | 44,260 |
| 595 MAINTENANCE OF LINE TRANSFORME | LB595 | P368 | 72,618 | - | - | - | - | - | - | - | - | - |
| 596 MAINTENANCE OF ST LIGHTS & SIG SYSTEMS | LB596 | P373 | 5,976 | - | - | - | - | - | - | - | - | - |
| 597 MAINTENANCE OF METERS | LB597 | P370 | - | - | - | - | - | - | - | - | - | - |
| 598 MAINTENANCE OF MISC DISTR PLANT | LB598 | PDIST | - | - | - | - | - | - | - | - | - | - |
| Total Distribution Maintenance Labor Expense | LBDM | | \$ 2,715,913 | \$ - | \$ - | \$ - | \$ 374,744 | \$ - | \$ 636,275 | \$ 1,068,063 | \$ 204,075 | \$ 354,163 |
| Total Distribution Operation and Maintenance Labor Expenses | | PDIST | \$ 11,896,170 | - | - | - | 1,736,429 | - | 1,722,281 | 2,910,349 | 571,478 | 995,179 |
| Transmission and Distribution Labor Expenses | | | \$ 16,068,302 | - | - | 4,172,132 | 1,736,429 | - | 1,722,281 | 2,910,349 | 571,478 | 995,179 |
| Production, Transmission and Distribution Labor Expenses | LBSUB | | \$ 49,525,423 | \$ 18,103,460 | \$ 15,353,661 | \$ 4,172,132 | \$ 1,736,429 | \$ - | \$ 1,722,281 | \$ 2,910,349 | \$ 571,478 | \$ 995,179 |
| Customer Accounts Expense | | | | | | | | | | | | |
| 901 SUPERVISION/CUSTOMER ACCTS | LB901 | F025 | \$ 1,093,166 | - | - | - | - | - | - | - | - | - |
| 902 METER READING EXPENSES | LB902 | F025 | 370,757 | - | - | - | - | - | - | - | - | - |
| 903 RECORDS AND COLLECTION | LB903 | F025 | 3,518,496 | - | - | - | - | - | - | - | - | - |
| 904 UNCOLLECTIBLE ACCOUNTS | LB904 | F025 | - | - | - | - | - | - | - | - | - | - |
| 905 MISC CUST ACCOUNTS | LB903 | F025 | - | - | - | - | - | - | - | - | - | - |
| Total Customer Accounts Labor Expense | LBCA | | \$ 4,982,419 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Customer Service Expense | | | | | | | | | | | | |
| 907 SUPERVISION | LB907 | F026 | \$ 145,428 | - | - | - | - | - | - | - | - | - |
| 908 CUSTOMER ASSISTANCE EXPENSES | LB908 | F026 | 617,471 | - | - | - | - | - | - | - | - | - |
| 908 CUSTOMER ASSISTANCE EXP-LOAD MGMT | LB908x | F026 | - | - | - | - | - | - | - | - | - | - |
| 909 INFORMATIONAL AND INSTRUCTIONA | LB909 | F026 | - | - | - | - | - | - | - | - | - | - |
| 909 INFORM AND INSTRUC -LOAD MGMT | LB909x | F026 | - | - | - | - | - | - | - | - | - | - |
| 910 MISCELLANEOUS CUSTOMER SERVICE | LB910 | F026 | 322,553 | - | - | - | - | - | - | - | - | - |
| 911 DEMONSTRATION AND SELLING EXP | LB911 | F026 | - | - | - | - | - | - | - | - | - | - |
| 912 DEMONSTRATION AND SELLING EXP | LB912 | F026 | - | - | - | - | - | - | - | - | - | - |
| 913 WATER HEATER - HEAT PUMP PROGRAM | LB913 | F026 | - | - | - | - | - | - | - | - | - | - |
| 915 MDSE-JOBING-CONTRACT | LB915 | F026 | - | - | - | - | - | - | - | - | - | - |
| 916 MISC SALES EXPENSE | LB916 | F026 | - | - | - | - | - | - | - | - | - | - |
| Total Customer Service Labor Expense | LBCS | | \$ 1,085,452 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Sub-Total Labor Exp | LBSUB7 | | \$ 55,593,293 | 18,103,460 | 15,353,661 | 4,172,132 | 1,736,429 | - | 1,722,281 | 2,910,349 | 571,478 | 995,179 |

LOUISVILLE GAS AND ELECTRIC COMPANY
 Cost of Service Study
 Functional Assignment and Classification

12 Months Ended
 June 30, 2022

| Description | Name | Functional Vector | Distribution Line Trans. | | Distribution Services | Distribution Meters | Distribution St. & Cust. Lighting | Customer Accounts Expense | Customer Service & Info. | Sales Expense |
|---|--------|-------------------|--------------------------|-----------|-----------------------|---------------------|-----------------------------------|---------------------------|--------------------------|---------------|
| | | | Demand | Customer | Customer | | | | | |
| Labor Expenses (Continued) | | | | | | | | | | |
| Distribution Maintenance Labor Expense | | | | | | | | | | |
| 590 MAINTENANCE SUPERVISION AND EN | LB590 | F024 | - | - | - | - | - | - | - | - |
| 591 MAINTENANCE OF STRUCTURES | LB591 | P362 | - | - | - | - | - | - | - | - |
| 592 MAINTENANCE OF STATION EQUIPME | LB592 | P362 | - | - | - | - | - | - | - | - |
| 593 MAINTENANCE OF OVERHEAD LINES | LB593 | P365 | - | - | - | - | - | - | - | - |
| 594 MAINTENANCE OF UNDERGROUND LIN | LB594 | P367 | - | - | - | - | - | - | - | - |
| 595 MAINTENANCE OF LINE TRANSFORME | LB595 | P368 | 46,627 | 25,991 | - | - | - | - | - | - |
| 596 MAINTENANCE OF ST LIGHTS & SIG SYSTEMS | LB596 | P373 | - | - | - | - | 5,976 | - | - | - |
| 597 MAINTENANCE OF METERS | LB597 | P370 | - | - | - | - | - | - | - | - |
| 598 MAINTENANCE OF MISC DISTR PLANT | LB598 | PDIST | - | - | - | - | - | - | - | - |
| Total Distribution Maintenance Labor Expense | LBDM | | \$ 46,627 | \$ 25,991 | \$ - | \$ - | \$ 5,976 | \$ - | \$ - | \$ - |
| Total Distribution Operation and Maintenance Labor Expenses | | PDIST | 156,149 | 87,039 | 39,032 | 3,543,567 | 134,667 | - | - | - |
| Transmission and Distribution Labor Expenses | | | 156,149 | 87,039 | 39,032 | 3,543,567 | 134,667 | - | - | - |
| Production, Transmission and Distribution Labor Expenses | LBSUB | | \$ 156,149 | \$ 87,039 | \$ 39,032 | \$ 3,543,567 | \$ 134,667 | \$ - | \$ - | \$ - |
| Customer Accounts Expense | | | | | | | | | | |
| 901 SUPERVISION/CUSTOMER ACCTS | LB901 | F025 | - | - | - | - | - | 1,093,166 | - | - |
| 902 METER READING EXPENSES | LB902 | F025 | - | - | - | - | - | 370,757 | - | - |
| 903 RECORDS AND COLLECTION | LB903 | F025 | - | - | - | - | - | 3,518,496 | - | - |
| 904 UNCOLLECTIBLE ACCOUNTS | LB904 | F025 | - | - | - | - | - | - | - | - |
| 905 MISC CUST ACCOUNTS | LB903 | F025 | - | - | - | - | - | - | - | - |
| Total Customer Accounts Labor Expense | LBCA | | \$ - | \$ - | \$ - | \$ - | \$ - | \$ 4,982,419 | \$ - | \$ - |
| Customer Service Expense | | | | | | | | | | |
| 907 SUPERVISION | LB907 | F026 | - | - | - | - | - | - | 145,428 | - |
| 908 CUSTOMER ASSISTANCE EXPENSES | LB908 | F026 | - | - | - | - | - | - | 617,471 | - |
| 908 CUSTOMER ASSISTANCE EXP-LOAD MGMT | LB908x | F026 | - | - | - | - | - | - | - | - |
| 909 INFORMATIONAL AND INSTRUCTIONA | LB909 | F026 | - | - | - | - | - | - | - | - |
| 909 INFORM AND INSTRUC -LOAD MGMT | LB909x | F026 | - | - | - | - | - | - | - | - |
| 910 MISCELLANEOUS CUSTOMER SERVICE | LB910 | F026 | - | - | - | - | - | - | 322,553 | - |
| 911 DEMONSTRATION AND SELLING EXP | LB911 | F026 | - | - | - | - | - | - | - | - |
| 912 DEMONSTRATION AND SELLING EXP | LB912 | F026 | - | - | - | - | - | - | - | - |
| 913 WATER HEATER - HEAT PUMP PROGRAM | LB913 | F026 | - | - | - | - | - | - | - | - |
| 915 MDSE-JOBING-CONTRACT | LB915 | F026 | - | - | - | - | - | - | - | - |
| 916 MISC SALES EXPENSE | LB916 | F026 | - | - | - | - | - | - | - | - |
| Total Customer Service Labor Expense | LBCS | | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ 1,085,452 | \$ - |
| Sub-Total Labor Exp | LBSUB7 | | 156,149 | 87,039 | 39,032 | 3,543,567 | 134,667 | 4,982,419 | 1,085,452 | - |

LOUISVILLE GAS AND ELECTRIC COMPANY
 Cost of Service Study
 Functional Assignment and Classification

12 Months Ended
 June 30, 2022

| Description | Name | Functional Vector | Total System | Production Demand | Production Energy | Transmission Demand | Distribution Substation | Distribution Primary Lines | | | Distribution Sec. Lines | |
|--|-------|-------------------|---------------|-------------------|-------------------|---------------------|-------------------------|----------------------------|--------------|--------------|-------------------------|--------------|
| | | | | LOLP | Energy | Demand | General | Specific | Demand | Customer | Demand | Customer |
| Labor Expenses (Continued) | | | | | | | | | | | | |
| Administrative and General Expense | | | | | | | | | | | | |
| 920 ADMIN. & GEN. SALARIES- | LB920 | LBSUB7 | \$ 20,000,454 | 6,512,969 | 5,523,691 | 1,500,982 | 624,704 | - | 619,614 | 1,047,038 | 205,597 | 358,029 |
| 921 OFFICE SUPPLIES AND EXPENSES | LB920 | LBSUB7 | - | - | - | - | - | - | - | - | - | - |
| 922 ADMIN. EXPENSES TRANSFERRED - CREDIT | LB922 | LBSUB7 | (2,892,849) | (942,030) | (798,942) | (217,101) | (90,357) | - | (89,621) | (151,443) | (29,737) | (51,785) |
| 923 OUTSIDE SERVICES EMPLOYED | LB923 | LBSUB7 | - | - | - | - | - | - | - | - | - | - |
| 924 PROPERTY INSURANCE | LB924 | TUP | - | - | - | - | - | - | - | - | - | - |
| 925 INJURIES AND DAMAGES | LB925 | LBSUB7 | - | - | - | - | - | - | - | - | - | - |
| 926 EMPLOYEE BENEFITS | LB926 | LBSUB7 | - | - | - | - | - | - | - | - | - | - |
| 928 REGULATORY COMMISSION FEES | LB928 | TUP | - | - | - | - | - | - | - | - | - | - |
| 929 DUPLICATE CHARGES-CR | LB929 | LBSUB7 | - | - | - | - | - | - | - | - | - | - |
| 930 MISCELLANEOUS GENERAL EXPENSES | LB930 | LBSUB7 | 165,400 | 53,861 | 45,680 | 12,413 | 5,166 | - | 5,124 | 8,659 | 1,700 | 2,961 |
| 931 RENTS AND LEASES | LB931 | PGP | - | - | - | - | - | - | - | - | - | - |
| 935 MAINTENANCE OF GENERAL PLANT | LB932 | PGP | 502,249 | 306,591 | - | 47,089 | 18,527 | - | 28,442 | 46,543 | 7,936 | 13,560 |
| Total Administrative and General Expense | LBAG | | \$ 17,775,254 | \$ 5,931,392 | \$ 4,770,429 | \$ 1,343,383 | \$ 558,040 | \$ - | \$ 563,560 | \$ 950,797 | \$ 185,495 | \$ 322,765 |
| Total Operation and Maintenance Expenses | TLB | | \$ 73,368,547 | \$ 24,034,852 | \$ 20,124,090 | \$ 5,515,515 | \$ 2,294,469 | \$ - | \$ 2,285,841 | \$ 3,861,146 | \$ 756,973 | \$ 1,317,944 |
| Operation and Maintenance Expenses Less Purchase Power | LBLPP | | \$ 73,368,547 | \$ 24,034,852 | \$ 20,124,090 | \$ 5,515,515 | \$ 2,294,469 | \$ - | \$ 2,285,841 | \$ 3,861,146 | \$ 756,973 | \$ 1,317,944 |

LOUISVILLE GAS AND ELECTRIC COMPANY
Cost of Service Study
Functional Assignment and Classification

12 Months Ended
June 30, 2022

| Description | Name | Functional Vector | Distribution Line Trans. | | Distribution Services | Distribution Meters | Distribution St. & Cust. Lighting | Customer Accounts Expense | Customer Service & Info. | Sales Expense |
|--|-------|-------------------|--------------------------|------------|-----------------------|---------------------|-----------------------------------|---------------------------|--------------------------|---------------|
| | | | Demand | Customer | Customer | | | | | |
| Labor Expenses (Continued) | | | | | | | | | | |
| Administrative and General Expense | | | | | | | | | | |
| 920 ADMIN. & GEN. SALARIES- | LB920 | LBSUB7 | 56,177 | 31,313 | 14,042 | 1,274,847 | 48,448 | 1,792,494 | 390,506 | - |
| 921 OFFICE SUPPLIES AND EXPENSES | LB920 | LBSUB7 | - | - | - | - | - | - | - | - |
| 922 ADMIN. EXPENSES TRANSFERRED - CREDIT | LB922 | LBSUB7 | (8,125) | (4,529) | (2,031) | (184,393) | (7,008) | (259,265) | (56,483) | - |
| 923 OUTSIDE SERVICES EMPLOYED | LB923 | LBSUB7 | - | - | - | - | - | - | - | - |
| 924 PROPERTY INSURANCE | LB924 | TUP | - | - | - | - | - | - | - | - |
| 925 INJURIES AND DAMAGES | LB925 | LBSUB7 | - | - | - | - | - | - | - | - |
| 926 EMPLOYEE BENEFITS | LB926 | LBSUB7 | - | - | - | - | - | - | - | - |
| 928 REGULATORY COMMISSION FEES | LB928 | TUP | - | - | - | - | - | - | - | - |
| 929 DUPLICATE CHARGES-CR | LB929 | LBSUB7 | - | - | - | - | - | - | - | - |
| 930 MISCELLANEOUS GENERAL EXPENSES | LB930 | LBSUB7 | 465 | 259 | 116 | 10,543 | 401 | 14,824 | 3,229 | - |
| 931 RENTS AND LEASES | LB931 | PGP | - | - | - | - | - | - | - | - |
| 935 MAINTENANCE OF GENERAL PLANT | LB932 | PGP | 9,721 | 5,419 | 3,465 | 3,533 | 11,423 | - | - | - |
| Total Administrative and General Expense | LBAG | | \$ 58,237 | \$ 32,462 | \$ 15,592 | \$ 1,104,530 | \$ 53,265 | \$ 1,548,053 | \$ 337,253 | \$ - |
| Total Operation and Maintenance Expenses | TLB | | \$ 214,386 | \$ 119,501 | \$ 54,624 | \$ 4,648,098 | \$ 187,932 | \$ 6,530,471 | \$ 1,422,705 | \$ - |
| Operation and Maintenance Expenses Less Purchase Power | LBLPP | | \$ 214,386 | \$ 119,501 | \$ 54,624 | \$ 4,648,098 | \$ 187,932 | \$ 6,530,471 | \$ 1,422,705 | \$ - |

LOUISVILLE GAS AND ELECTRIC COMPANY
 Cost of Service Study
 Functional Assignment and Classification

12 Months Ended
 June 30, 2022

| Description | Name | Functional Vector | Total System | Production Demand | Production Energy | Transmission Demand | Distribution Substation | Distribution Primary Lines | | Distribution Sec. Lines | | |
|---|---------|-------------------|------------------|-------------------|-------------------|---------------------|-------------------------|----------------------------|---------------|-------------------------|--------------|---------------|
| | | | | LOLP | Energy | Demand | General | Specific | Demand | Customer | Demand | Customer |
| Other Expenses | | | | | | | | | | | | |
| Depreciation Expenses | | | | | | | | | | | | |
| Steam Production | DEPRTP | PPRTL | \$ 179,722,988 | 179,722,988 | - | - | - | - | - | - | - | - |
| Hydraulic Production | DEPRDP1 | PPRTL | 5,725,980 | 5,725,980 | - | - | - | - | - | - | - | - |
| Other Production | DEPRDP2 | PPRTL | 12,399,786 | 12,399,786 | - | - | - | - | - | - | - | - |
| Transmission - Kentucky System Property | DEPRDP3 | PTRAN | 12,287,717 | - | - | 12,287,717 | - | - | - | - | - | - |
| Transmission - Virginia Property | DEPRDP4 | PTRAN | - | - | - | - | - | - | - | - | - | - |
| Distribution | DEPRDP5 | PDIST | 42,603,324 | - | - | - | 5,312,707 | - | 8,155,954 | 13,346,638 | 2,275,586 | 3,888,419 |
| General & Common Plant | DEPRDP6 | PGP | 24,383,040 | 14,884,317 | - | 2,286,078 | 899,429 | - | 1,380,784 | 2,259,555 | 385,251 | 658,300 |
| Intangible Plant | DEPRDP7 | PINT | - | - | - | - | - | - | - | - | - | - |
| Total Depreciation Expense | TDEPR | | \$ 277,122,836 | 212,733,072 | - | 14,573,795 | 6,212,136 | - | 9,536,738 | 15,606,193 | 2,660,837 | 4,546,719 |
| Regulatory Credits | | | | | | | | | | | | |
| Production | RCTNP | F017 | \$ - | - | - | - | - | - | - | - | - | - |
| Transmission | RCTNT | PTRAN | - | - | - | - | - | - | - | - | - | - |
| Distribution | RDTND | PDIST | - | - | - | - | - | - | - | - | - | - |
| Common | RCTNC | PGP | - | - | - | - | - | - | - | - | - | - |
| Total Regulatory Credits | TRCTN | | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Accretion Expense | | | | | | | | | | | | |
| Production | ACRTNP | F017 | \$ - | - | - | - | - | - | - | - | - | - |
| Transmission | ACRTNT | PTRAN | - | - | - | - | - | - | - | - | - | - |
| Distribution | ACRTND | PDIST | - | - | - | - | - | - | - | - | - | - |
| Common | ACRTNC | PGP | - | - | - | - | - | - | - | - | - | - |
| Total Accretion Expense | TACRTN | | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Property Taxes & Other | PTAX | TUP | \$ 42,336,722 | 25,721,711 | - | 4,076,189 | 1,563,612 | - | 2,400,424 | 3,928,124 | 669,740 | 1,144,422 |
| Amortization of Investment Tax Credit | OTAX | TUP | \$ (916,996) | (557,122) | - | (88,289) | (33,867) | - | (51,992) | (85,082) | (14,506) | (24,788) |
| Gain on Disposition of Allowances | OT | TUP | \$ - | - | - | - | - | - | - | - | - | - |
| Interest | INTLTD | TUP | \$ 75,433,705 | 45,829,811 | - | 7,262,774 | 2,785,976 | - | 4,276,970 | 6,998,958 | 1,193,314 | 2,039,081 |
| Other Deductions | DEDUCT | TUP | \$ - | - | - | - | - | - | - | - | - | - |
| Total Other Expenses | TOE | | \$ 393,976,267 | \$ 283,727,472 | \$ - | \$ 25,824,469 | \$ 10,527,856 | \$ - | \$ 16,162,141 | \$ 26,448,193 | \$ 4,509,385 | \$ 7,705,435 |
| Total Cost of Service (O&M + Other Expenses) | | | \$ 1,037,412,928 | \$ 395,685,570 | \$ 397,495,519 | \$ 60,290,462 | \$ 18,602,235 | \$ - | \$ 29,362,316 | \$ 48,540,917 | \$ 8,678,514 | \$ 14,929,226 |

LOUISVILLE GAS AND ELECTRIC COMPANY
 Cost of Service Study
 Functional Assignment and Classification

12 Months Ended
 June 30, 2022

| Description | Name | Functional Vector | Distribution Line Trans. | | Distribution Services | Distribution Meters | Distribution St. & Cust. Lighting | Customer Accounts Expense | Customer Service & Info. | Sales Expense |
|---|---------------|-------------------|--------------------------|---------------------|-----------------------|----------------------|-----------------------------------|---------------------------|--------------------------|---------------|
| | | | Demand | Customer | Customer | Customer | Customer | Customer | Customer | Customer |
| Other Expenses | | | | | | | | | | |
| Depreciation Expenses | | | | | | | | | | |
| Steam Production | DEPRTP | PPRTL | - | - | - | - | - | - | - | - |
| Hydraulic Production | DEPRDP1 | PPRTL | - | - | - | - | - | - | - | - |
| Other Production | DEPRDP2 | PPRTL | - | - | - | - | - | - | - | - |
| Transmission - Kentucky System Property | DEPRDP3 | PTRAN | - | - | - | - | - | - | - | - |
| Transmission - Virginia Property | DEPRDP4 | PTRAN | - | - | - | - | - | - | - | - |
| Distribution | DEPRDP5 | PDIST | 2,787,721 | 1,553,897 | 993,517 | 1,013,216 | 3,275,670 | - | - | - |
| General & Common Plant | DEPRDP6 | PGP | 471,955 | 263,071 | 168,200 | 171,535 | 554,563 | - | - | - |
| Intangible Plant | DEPRDP7 | PINT | - | - | - | - | - | - | - | - |
| Total Depreciation Expense | TDEPR | | 3,259,675 | 1,816,969 | 1,161,717 | 1,184,751 | 3,830,233 | - | - | - |
| Regulatory Credits | | | | | | | | | | |
| Production | RCTNP | F017 | - | - | - | - | - | - | - | - |
| Transmission | RCTNT | PTRAN | - | - | - | - | - | - | - | - |
| Distribution | RDTND | PDIST | - | - | - | - | - | - | - | - |
| Common | RCTNC | PGP | - | - | - | - | - | - | - | - |
| Total Regulatory Credits | TRCTN | | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Accretion Expense | | | | | | | | | | |
| Production | ACRTNP | F017 | - | - | - | - | - | - | - | - |
| Transmission | ACRTNT | PTRAN | - | - | - | - | - | - | - | - |
| Distribution | ACRTND | PDIST | - | - | - | - | - | - | - | - |
| Common | ACRTNC | PGP | - | - | - | - | - | - | - | - |
| Total Accretion Expense | TACRTN | | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Property Taxes & Other | PTAX | TUP | 820,470 | 457,336 | 292,408 | 298,205 | 964,081 | - | - | - |
| Amortization of Investment Tax Credit | OTAX | TUP | (17,771) | (9,906) | (6,333) | (6,459) | (20,882) | - | - | - |
| Gain on Disposition of Allowances | OT | TUP | - | - | - | - | - | - | - | - |
| Interest | INTLTD | TUP | 1,461,877 | 814,862 | 520,999 | 531,329 | 1,717,757 | - | - | - |
| Other Deductions | DEDUCT | TUP | - | - | - | - | - | - | - | - |
| Total Other Expenses | TOE | | \$ 5,524,250 | \$ 3,079,261 | \$ 1,968,790 | \$ 2,007,826 | \$ 6,491,189 | \$ - | \$ - | \$ - |
| Total Cost of Service (O&M + Other Expenses) | | | \$ 6,641,280 | \$ 3,701,902 | \$ 2,301,703 | \$ 15,926,141 | \$ 8,165,124 | \$ 22,203,328 | \$ 4,888,693 | \$ - |

LOUISVILLE GAS AND ELECTRIC COMPANY

Cost of Service Study
Functional Assignment and Classification

Exhibit WSS-30

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12 Months Ended
June 30, 2022

| Description | Name | Functional Vector | Total System | Production Demand | Production Energy | Transmission Demand | Distribution Substation | Distribution Primary Lines | | | Distribution Sec. Lines | |
|--|--------|-------------------|---------------|-------------------|-------------------|---------------------|-------------------------|----------------------------|-------------|--------------|-------------------------|-------------|
| | | | | LOLP | Energy | Demand | General | Specific | Demand | Customer | Demand | Customer |
| External Functional Vectors | | | | | | | | | | | | |
| Station Equipment | F001 | | 1.000000 | 0.000000 | 0.000000 | 0.000000 | 1.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 |
| Poles, Towers and Fixtures | F002 | | 1.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.253943 | 0.451257 | 0.106157 | 0.188643 |
| Overhead Conductors and Devices | F003 | | 1.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.253943 | 0.451257 | 0.106157 | 0.188643 |
| Underground Conductors and Devices | F004 | | 1.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.353513 | 0.527187 | 0.047887 | 0.071413 |
| Line Transformers | F005 | | 1.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 |
| Services | F006 | | 1.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 |
| Meters | F007 | | 1.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 |
| Street Lighting | F008 | | 1.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 |
| Meter Reading | F009 | | 1.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 |
| Billing | F010 | | 1.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 |
| Transmission | F011 | | 1.000000 | 0.000000 | 0.000000 | 1.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 |
| Load Management | F012 | | 1.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 |
| Production Plant | F017 | | 1.000000 | 1.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 |
| Provar | PROVAR | | 1.000000 | 0.000000 | 1.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 |
| Fuel | F018 | | 1.000000 | 0.000000 | 1.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 |
| Steam Generation Operation Labor | F019 | | 12,601,985 | 11,007,917 | 1,594,068 | - | - | - | - | - | - | - |
| PROFIX | PROFIX | | 1.000000 | 1.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 |
| Steam Generation Maintenance Labor | F020 | | 7,744,702 | 30,396 | 7,714,306 | - | - | - | - | - | - | - |
| Hydraulic Generation Operation Labor | F021 | | 262,377 | 262,377 | - | - | - | - | - | - | - | - |
| Hydraulic Generation Maintenance Labor | F022 | | 158,283 | 86,045 | 72,238 | - | - | - | - | - | - | - |
| Distribution Operation Labor | F023 | | 8,228,555 | - | - | - | 1,220,520.97 | - | 973,421.84 | 1,651,299.68 | 329,314.48 | 574,563.39 |
| Distribution Maintenance Labor | F024 | | 2,715,913 | - | - | - | 374,744.00 | - | 636,274.68 | 1,068,062.67 | 204,075.04 | 354,162.61 |
| Customer Accounts Expense | F025 | | 1.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 |
| Customer Service Expense | F026 | | 1.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 |
| Customer Advances | F027 | | 1,160,271,505 | - | - | - | - | - | 342,041,384 | 559,726,383 | 95,432,668 | 163,071,070 |
| Purchase Power Demand | F017 | | 27,272,357 | 27,272,357 | - | - | - | - | - | - | - | - |
| Purchase Power Energy | F018 | | 22,555,449 | - | 22,555,449 | - | - | - | - | - | - | - |
| Purchased Power Expenses | OMPP | | 49,827,806 | 27,272,357 | 22,555,449 | - | - | - | - | - | - | - |
| Installations on Customer Premises - Plant in Service | F013 | | 1.000000 | - | - | - | - | - | - | - | - | - |
| Installations on Customer Premises - Accum Depr | F014 | | 1.000000 | - | - | - | - | - | - | - | - | - |
| Generators -Energy | F015 | | 1.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 |
| Generators - Demand | F016 | | 1.000000 | 1.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 |
| Energy | Energy | | 1.000000 | 0.000000 | 1.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 |
| Internally Generated Functional Vectors | | | | | | | | | | | | |
| Total Prod, Trans, and Dist Plant | PT&D | | 1.000000 | 0.610437 | - | 0.093757 | 0.036887 | - | 0.056629 | 0.092669 | 0.015800 | 0.026998 |
| Total Distribution Plant | PDIST | | 1.000000 | - | - | - | 0.124702 | - | 0.191439 | 0.313277 | 0.053413 | 0.091270 |
| Total Transmission Plant | PTRAN | | 1.000000 | - | - | 1.000000 | - | - | - | - | - | - |
| Operation and Maintenance Expenses Less Purchase Power | OMLPP | | 1.000000 | 0.147080 | 0.629675 | 0.057428 | 0.013454 | - | 0.021994 | 0.036811 | 0.006947 | 0.012036 |
| Total Plant in Service | TPIS | | 1.000000 | 0.610168 | - | 0.093710 | 0.036927 | - | 0.056689 | 0.092768 | 0.015817 | 0.027027 |
| Total Operation and Maintenance Expenses (Labor) | TLB | | 1.000000 | 0.327591 | 0.274288 | 0.075175 | 0.031273 | - | 0.031156 | 0.052627 | 0.010317 | 0.017963 |
| Sub-Total Prod, Trans, Dist, Cust Acct and Cust Service | OMSUB2 | | 1.000000 | 0.144948 | 0.676053 | 0.049836 | 0.009548 | - | 0.018387 | 0.030749 | 0.005782 | 0.010014 |
| Total Steam Power Operation Expenses (Labor) | LBSUB1 | | 1.000000 | 0.873507 | 0.126493 | - | - | - | - | - | - | - |
| Total Steam Power Generation Maintenance Expense (Labor) | LBSUB2 | | 1.000000 | 0.003925 | 0.996075 | - | - | - | - | - | - | - |
| Total Hydraulic Power Operation Expenses (Labor) | LBSUB3 | | 1.000000 | 1.000000 | - | - | - | - | - | - | - | - |
| Total Hydraulic Power Generation Maint. Expense (Labor) | LBSUB4 | | 1.000000 | 0.543615 | 0.456385 | - | - | - | - | - | - | - |
| Total Other Power Generation Expenses (Labor) | LBSUB5 | | 1.000000 | 1.000000 | - | - | - | - | - | - | - | - |
| Total Transmission Labor Expenses | LBTRAN | | 1.000000 | - | - | 1.000000 | - | - | - | - | - | - |
| Total Distribution Operation Labor Expense | LBDO | | 1.000000 | - | - | - | 0.148327 | - | 0.118298 | 0.200679 | 0.040021 | 0.069826 |
| Total Distribution Maintenance Labor Expense | LBDM | | 1.000000 | - | - | - | 0.137981 | - | 0.234277 | 0.393261 | 0.075140 | 0.130403 |
| Sub-Total Labor Exp | LBSUB7 | | 1.000000 | 0.325641 | 0.276178 | 0.075047 | 0.031234 | - | 0.030980 | 0.052351 | 0.010280 | 0.017901 |
| Total General Plant | PGP | | 1.000000 | 0.610437 | - | 0.093757 | 0.036887 | - | 0.056629 | 0.092669 | 0.015800 | 0.026998 |
| Total Production Plant | PPRTL | | 1.000000 | 1.000000 | - | - | - | - | - | - | - | - |
| Total Intangible Plant | PINT | | 1.000000 | 0.610437 | - | 0.093757 | 0.036887 | - | 0.056629 | 0.092669 | 0.015800 | 0.026998 |

LOUISVILLE GAS AND ELECTRIC COMPANY
Cost of Service Study
Functional Assignment and Classification

12 Months Ended
June 30, 2022

| Description | Name | Functional Vector | Distribution Line Trans. | | Distribution Services | Distribution Meters | Distribution St. & Cust. Lighting | Customer Accounts Expense | Customer Service & Info. | Sales Expense |
|--|--------|-------------------|--------------------------|-----------|-----------------------|---------------------|-----------------------------------|---------------------------|--------------------------|---------------|
| | | | Demand | Customer | Customer | | | | | |
| External Functional Vectors | | | | | | | | | | |
| Station Equipment | F001 | | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 |
| Poles, Towers and Fixtures | F002 | | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 |
| Overhead Conductors and Devices | F003 | | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 |
| Underground Conductors and Devices | F004 | | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 |
| Line Transformers | F005 | | 0.642093 | 0.357907 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 |
| Services | F006 | | 0.000000 | 0.000000 | 1.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 |
| Meters | F007 | | 0.000000 | 0.000000 | 0.000000 | 1.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 |
| Street Lighting | F008 | | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 1.000000 | 0.000000 | 0.000000 | 0.000000 |
| Meter Reading | F009 | | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 1.000000 | 0.000000 | 0.000000 |
| Billing | F010 | | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 1.000000 | 0.000000 | 0.000000 |
| Transmission | F011 | | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 |
| Load Management | F012 | | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 1.000000 |
| Production Plant | F017 | | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 |
| Provar | PROVAR | | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 |
| Fuel | F018 | | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 |
| Steam Generation Operation Labor | F019 | | - | - | - | - | - | - | - | - |
| PROFIX | PROFIX | | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 |
| Steam Generation Maintenance Labor | F020 | | - | - | - | - | - | - | - | - |
| Hydraulic Generation Operation Labor | F021 | | - | - | - | - | - | - | - | - |
| Hydraulic Generation Maintenance Labor | F022 | | - | - | - | - | - | - | - | - |
| Distribution Operation Labor | F023 | | 98,167.48 | 54,719.33 | 34,985.95 | 3,176,211.63 | 115,350.25 | - | - | - |
| Distribution Maintenance Labor | F024 | | 46,627.48 | 25,990.52 | - | - | 5,976.00 | - | - | - |
| Customer Accounts Expense | F025 | | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 1.000000 | 0.000000 | 0.000000 |
| Customer Service Expense | F026 | | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 1.000000 | 0.000000 | 0.000000 |
| Customer Advances | F027 | | - | - | - | - | - | - | - | - |
| Purchase Power Demand | F017 | | - | - | - | - | - | - | - | - |
| Purchase Power Energy | F018 | | - | - | - | - | - | - | - | - |
| Purchased Power Expenses | OMPP | | - | - | - | - | - | - | - | - |
| Installations on Customer Premises - Plant in Service | F013 | | - | - | - | - | - | 1.000000 | - | - |
| Installations on Customer Premises - Accum Depr | F014 | | - | - | - | - | - | 1.000000 | - | - |
| Generators -Energy | F015 | | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 |
| Generators - Demand | F016 | | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 |
| Energy | | | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 |
| Internally Generated Functional Vectors | | | | | | | | | | |
| Total Prod, Trans, and Dist Plant | PT&D | | 0.019356 | 0.010789 | 0.006898 | 0.007035 | 0.022744 | - | - | - |
| Total Distribution Plant | PDIST | | 0.065434 | 0.036474 | 0.023320 | 0.023783 | 0.076888 | - | - | - |
| Total Transmission Plant | PTRAN | | - | - | - | - | - | - | - | - |
| Operation and Maintenance Expenses Less Purchase Power | OMLPP | | 0.001861 | 0.001037 | 0.000555 | 0.023191 | 0.002789 | 0.036996 | 0.008146 | - |
| Total Plant in Service | TPIS | | 0.019376 | 0.010801 | 0.006906 | 0.007043 | 0.022768 | - | - | - |
| Total Operation and Maintenance Expenses (Labor) | TLB | | 0.002922 | 0.001629 | 0.000745 | 0.063353 | 0.002561 | 0.089009 | 0.019391 | - |
| Sub-Total Prod, Trans, Dist, Cust Acct and Cust Service | OMSUB2 | | 0.001241 | 0.000692 | 0.000366 | 0.016248 | 0.002225 | 0.027768 | 0.006142 | - |
| Total Steam Power Operation Expenses (Labor) | LBSUB1 | | - | - | - | - | - | - | - | - |
| Total Steam Power Generation Maintenance Expense (Labor) | LBSUB2 | | - | - | - | - | - | - | - | - |
| Total Hydraulic Power Operation Expenses (Labor) | LBSUB3 | | - | - | - | - | - | - | - | - |
| Total Hydraulic Power Generation Maint. Expense (Labor) | LBSUB4 | | - | - | - | - | - | - | - | - |
| Total Other Power Generation Expenses (Labor) | LBSUB5 | | - | - | - | - | - | - | - | - |
| Total Transmission Labor Expenses | LBTRAN | | - | - | - | - | - | - | - | - |
| Total Distribution Operation Labor Expense | LBDO | | 0.011930 | 0.006650 | 0.004252 | 0.385999 | 0.014018 | - | - | - |
| Total Distribution Maintenance Labor Expense | LBDM | | 0.017168 | 0.009570 | - | - | 0.002200 | - | - | - |
| Sub-Total Labor Exp | LBSUB7 | | 0.002809 | 0.001566 | 0.000702 | 0.063741 | 0.002422 | 0.089623 | 0.019525 | - |
| Total General Plant | PGP | | 0.019356 | 0.010789 | 0.006898 | 0.007035 | 0.022744 | - | - | - |
| Total Production Plant | PPRTL | | - | - | - | - | - | - | - | - |
| Total Intangible Plant | PINT | | 0.019356 | 0.010789 | 0.006898 | 0.007035 | 0.022744 | - | - | - |

Exhibit WSS-31

Electric Cost of Service Study Class Allocation (Kentucky Utilities)

KENTUCKY UTILITIES COMPANY
Cost of Service Study
Class Allocation
12 Months Ended June 30, 2022

Exhibit WSS-31
Page 1 of 36

LOLP Methodology

| Description | Ref | Name | Allocation Vector | Total System | Residential Rate RS | General Service GS | All Electric Schools AES | Power Service PS-Secondary | Power Service PS-Primary | Time of Day TOD-Secondary | Time of Day TOD-Primary |
|--|------|---------|-------------------|------------------|---------------------|--------------------|--------------------------|----------------------------|--------------------------|---------------------------|-------------------------|
| Plant in Service | | | | | | | | | | | |
| Power Production Plant | | | | | | | | | | | |
| Production Demand - LOLP | TPIS | PLPPDB | GPLOLPDA | \$ 6,073,014,123 | \$ 2,490,784,384 | \$ 670,878,802 | \$ 43,048,460 | \$ 625,621,337 | \$ 27,180,233 | \$ 601,676,613 | \$ 1,101,435,630 |
| Production Energy | TPIS | PLPPEB | E01 | - | - | - | - | - | - | - | - |
| Total Power Production Plant | | PLPPT | | \$ 6,073,014,123 | \$ 2,490,784,384 | \$ 670,878,802 | \$ 43,048,460 | \$ 625,621,337 | \$ 27,180,233 | \$ 601,676,613 | \$ 1,101,435,630 |
| Transmission Plant | | | | | | | | | | | |
| Transmission Demand | TPIS | PLTRB | NCPT | \$ 1,314,530,303 | \$ 581,215,750 | \$ 149,186,114 | \$ 15,268,347 | \$ 133,087,047 | \$ 5,718,859 | \$ 117,737,434 | \$ 191,751,289 |
| Distribution Poles | | | | | | | | | | | |
| Specific | TPIS | PLDPS | NCPP | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Distribution Substation | | | | | | | | | | | |
| General | TPIS | PLDSG | NCPP | \$ 354,760,183 | \$ 171,330,235 | \$ 43,976,943 | \$ 4,500,789 | \$ 39,231,275 | \$ 1,685,800 | \$ 34,706,531 | \$ 56,524,266 |
| Distribution Primary & Secondary Lines | | | | | | | | | | | |
| Primary Specific | TPIS | PLDPLS | NCPP | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Primary Demand | TPIS | PLDPLD | NCPP | \$ 282,159,692 | \$ 136,268,073 | \$ 34,977,208 | \$ 3,579,718 | \$ 31,202,725 | \$ 1,340,807 | \$ 27,603,955 | \$ 44,956,763 |
| Primary Customer | TPIS | PLDPLC | PCust08 | \$ 548,452,178 | \$ 440,598,864 | \$ 82,429,964 | \$ 422,398 | \$ 4,425,216 | \$ 203,229 | \$ 762,109 | \$ 255,033 |
| Secondary Demand | TPIS | PLDSL D | SICD | \$ 127,023,977 | \$ 105,210,533 | \$ 19,625,864 | \$ 1,422,586 | \$ - | \$ - | \$ - | \$ - |
| Secondary Customer | TPIS | PLDSL C | PCust07 | \$ 256,429,859 | \$ 208,143,126 | \$ 38,940,705 | \$ 199,545 | \$ - | \$ - | \$ - | \$ - |
| Total Distribution Primary & Secondary Lines | | PLDLT | | \$ 1,214,065,706 | \$ 890,220,596 | \$ 175,973,741 | \$ 5,624,246 | \$ 35,627,941 | \$ 1,544,036 | \$ 28,366,064 | \$ 45,211,795 |
| Distribution Line Transformers | | | | | | | | | | | |
| Demand | TPIS | PLDLTD | SICDT | \$ 185,167,208 | \$ 126,572,323 | \$ 23,610,670 | \$ 1,711,426 | \$ 17,444,145 | \$ - | \$ 14,887,651 | \$ - |
| Customer | TPIS | PLDLTC | PCust09 | \$ 153,841,916 | \$ 123,692,201 | \$ 23,141,103 | \$ 118,583 | \$ 1,242,320 | \$ - | \$ 213,952 | \$ - |
| Total Line Transformers | | PLDLTT | | \$ 339,009,124 | \$ 250,264,524 | \$ 46,751,773 | \$ 1,830,008 | \$ 18,686,465 | \$ - | \$ 15,101,603 | \$ - |
| Distribution Services | | | | | | | | | | | |
| Customer | TPIS | PLDSC | C02 | \$ 129,708,296 | \$ 102,581,566 | \$ 23,061,068 | \$ 208,650 | \$ 2,996,910 | \$ - | \$ 857,403 | \$ - |
| Distribution Meters | | | | | | | | | | | |
| Customer | TPIS | PLDMC | MGPA | \$ 77,142,557 | \$ 46,508,310 | \$ 18,767,490 | \$ 383,084 | \$ 5,867,892 | \$ 1,147,531 | \$ 1,049,543 | \$ 2,032,818 |
| Distribution Street & Customer Lighting | | | | | | | | | | | |
| Customer | TPIS | PLDSCL | PCust04 | \$ 148,542,746 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Customer Accounts Expense | | | | | | | | | | | |
| Customer | TPIS | PLCAE | PCust05 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Customer Service & Info. | | | | | | | | | | | |
| Customer | TPIS | PLCSI | PCust05 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Sales Expense | | | | | | | | | | | |
| Customer | TPIS | PLSEC | PCust06 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Total | | PLT | | \$ 9,650,773,038 | \$ 4,532,905,364 | \$ 1,128,595,931 | \$ 70,863,586 | \$ 861,118,868 | \$ 37,276,458 | \$ 799,495,189 | \$ 1,396,955,797 |

KENTUCKY UTILITIES COMPANY
Cost of Service Study
Class Allocation
12 Months Ended June 30, 2022

LOLP Methodology

| Description | Ref | Name | Allocation Vector | Retail Transmission Service | Fluctuating Load Service | Outdoor Lighting | Lighting Energy | Traffic Energy | Outdoor Sports Lighting | Electric Vehicle Charging | Solar Share | Business Solar |
|---|------|--------|-------------------|-----------------------------|--------------------------|------------------|-----------------|----------------|-------------------------|---------------------------|--------------|----------------|
| | | | | RTS - Transmission | FLS - Transmission | LS & RLS | LE | TE | OSL | EV | SSP | BS |
| Plant in Service | | | | | | | | | | | | |
| Power Production Plant | | | | | | | | | | | | |
| Production Demand - LOLP | TPIS | PLPPDB | GPLOLPDA | \$ 358,533,878 | \$ 148,468,386 | \$ 967,726 | \$ 35,209 | \$ 575,745 | \$ 74,108 | \$ 5,011 | \$ 3,325,058 | \$ 403,543 |
| Production Energy | TPIS | PLPPEB | E01 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Total Power Production Plant | | PLPPT | | \$ 358,533,878 | \$ 148,468,386 | \$ 967,726 | \$ 35,209 | \$ 575,745 | \$ 74,108 | \$ 5,011 | \$ 3,325,058 | \$ 403,543 |
| Transmission Plant | | | | | | | | | | | | |
| Transmission Demand | TPIS | PLTRB | NCPT | \$ 66,495,202 | \$ 44,556,885 | \$ 8,974,247 | \$ 326,511 | \$ 87,970 | \$ 123,876 | \$ 773 | \$ - | \$ - |
| Distribution Poles Specific | | | | | | | | | | | | |
| Distribution Poles Specific | TPIS | PLDPS | NCPP | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Distribution Substation General | | | | | | | | | | | | |
| Distribution Substation General | TPIS | PLDSG | NCPP | \$ - | \$ - | \$ 2,645,420 | \$ 96,249 | \$ 25,932 | \$ 36,516 | \$ 228 | \$ - | \$ - |
| Distribution Primary & Secondary Lines | | | | | | | | | | | | |
| Primary Specific | TPIS | PLDPLS | NCPP | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Primary Demand | TPIS | PLDPLD | NCPP | \$ - | \$ - | \$ 2,104,044 | \$ 76,552 | \$ 20,625 | \$ 29,043 | \$ 181 | \$ - | \$ - |
| Primary Customer | TPIS | PLDPLC | PCust08 | \$ - | \$ - | \$ 19,182,023 | \$ 11,955 | \$ 147,441 | \$ 3,985 | \$ 9,962 | \$ - | \$ - |
| Secondary Demand | TPIS | PLDSL | SICD | \$ - | \$ - | \$ 731,162 | \$ 26,602 | \$ 7,167 | \$ - | \$ 63 | \$ - | \$ - |
| Secondary Customer | TPIS | PLDSL | PCust07 | \$ - | \$ - | \$ 9,061,771 | \$ 5,647 | \$ 69,652 | \$ - | \$ 9,412 | \$ - | \$ - |
| Total Distribution Primary & Secondary Lines | | PLDLT | | \$ - | \$ - | \$ 31,079,000 | \$ 120,756 | \$ 244,885 | \$ 33,028 | \$ 19,619 | \$ - | \$ - |
| Distribution Line Transformers | | | | | | | | | | | | |
| Demand | TPIS | PLDLTD | SICDT | \$ - | \$ - | \$ 879,616 | \$ 32,003 | \$ 8,622 | \$ 20,677 | \$ 76 | \$ - | \$ - |
| Customer | TPIS | PLDLTC | PCust09 | \$ - | \$ - | \$ 5,385,095 | \$ 3,356 | \$ 41,392 | \$ 1,119 | \$ 2,797 | \$ - | \$ - |
| Total Line Transformers | | PLDLTT | | \$ - | \$ - | \$ 6,264,710 | \$ 35,359 | \$ 50,014 | \$ 21,795 | \$ 2,873 | \$ - | \$ - |
| Distribution Services Customer | | | | | | | | | | | | |
| Distribution Services Customer | TPIS | PLDSC | C02 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ 2,699 | \$ - | \$ - | \$ - |
| Distribution Meters Customer | | | | | | | | | | | | |
| Distribution Meters Customer | TPIS | PLDMC | MGPA | \$ 1,007,857 | \$ 62,215 | \$ - | \$ 11,355 | \$ 139,943 | \$ 5,286 | \$ 159,234 | \$ - | \$ - |
| Distribution Street & Customer Lighting Customer | | | | | | | | | | | | |
| Distribution Street & Customer Lighting Customer | TPIS | PLDSCL | PCust04 | \$ - | \$ - | \$ 148,542,746 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Customer Accounts Expense Customer | | | | | | | | | | | | |
| Customer Accounts Expense Customer | TPIS | PLCAE | PCust05 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Customer Service & Info. Customer | | | | | | | | | | | | |
| Customer Service & Info. Customer | TPIS | PLCSI | PCust05 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Sales Expense Customer | | | | | | | | | | | | |
| Sales Expense Customer | TPIS | PLSEC | PCust06 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Total | | PLT | | \$ 426,036,937 | \$ 193,087,486 | \$ 198,473,848 | \$ 625,438 | \$ 1,124,489 | \$ 297,309 | \$ 187,737 | \$ 3,325,058 | \$ 403,543 |

KENTUCKY UTILITIES COMPANY
Cost of Service Study
Class Allocation
12 Months Ended June 30, 2022

LOLP Methodology

| Description | Ref | Name | Allocation Vector | Total System | Residential Rate RS | General Service GS | All Electric Schools AES | Power Service PS-Secondary | Power Service PS-Primary | Time of Day TOD-Secondary | Time of Day TOD-Primary |
|--|---------|--------|-------------------|------------------|---------------------|--------------------|--------------------------|----------------------------|--------------------------|---------------------------|-------------------------|
| Net Utility Plant | | | | | | | | | | | |
| Power Production Plant | | | | | | | | | | | |
| Production Demand - LOLP | NTPLANT | UPPPDB | NPLOLPDA | \$ 3,680,027,941 | \$ 1,508,811,050 | \$ 406,389,793 | \$ 26,076,923 | \$ 378,974,749 | \$ 16,464,627 | \$ 364,470,055 | \$ 667,202,773 |
| Production Energy | NTPLANT | UPPPEB | E01 | - | - | - | - | - | - | - | - |
| Total Power Production Plant | | UPPPT | | \$ 3,680,027,941 | \$ 1,508,811,050 | \$ 406,389,793 | \$ 26,076,923 | \$ 378,974,749 | \$ 16,464,627 | \$ 364,470,055 | \$ 667,202,773 |
| Transmission Plant | | | | | | | | | | | |
| Transmission Demand | NTPLANT | UPTRB | NCPT | \$ 1,036,890,044 | \$ 458,457,917 | \$ 117,676,706 | \$ 12,043,539 | \$ 104,977,903 | \$ 4,510,986 | \$ 92,870,261 | \$ 151,251,745 |
| Distribution Poles | | | | | | | | | | | |
| Specific | NTPLANT | UPDPS | NCPP | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Distribution Substation | | | | | | | | | | | |
| General | NTPLANT | UPDSG | NCPP | \$ 246,738,027 | \$ 119,161,299 | \$ 30,586,251 | \$ 3,130,328 | \$ 27,285,608 | \$ 1,172,485 | \$ 24,138,619 | \$ 39,312,996 |
| Distribution Primary & Secondary Lines | | | | | | | | | | | |
| Primary Specific | NTPLANT | UPDPLS | NCPP | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Primary Demand | NTPLANT | UPDPLD | NCPP | \$ 196,243,910 | \$ 94,775,335 | \$ 24,326,877 | \$ 2,489,717 | \$ 21,701,699 | \$ 932,540 | \$ 19,198,731 | \$ 31,267,722 |
| Primary Customer | NTPLANT | UPDPLC | PCust08 | \$ 381,452,075 | \$ 306,439,390 | \$ 57,330,579 | \$ 293,780 | \$ 3,077,766 | \$ 141,347 | \$ 530,052 | \$ 177,377 |
| Secondary Demand | NTPLANT | UPDSL | SICD | \$ 88,346,006 | \$ 73,174,614 | \$ 13,649,917 | \$ 989,418 | \$ - | \$ - | \$ - | \$ - |
| Secondary Customer | NTPLANT | UPDSL | PCust07 | \$ 178,348,644 | \$ 144,764,905 | \$ 27,083,515 | \$ 138,785 | \$ - | \$ - | \$ - | \$ - |
| Total Distribution Primary & Secondary Lines | | UPDLT | | \$ 844,390,636 | \$ 619,154,244 | \$ 122,390,887 | \$ 3,911,700 | \$ 24,779,466 | \$ 1,073,887 | \$ 19,728,783 | \$ 31,445,099 |
| Distribution Line Transformers | | | | | | | | | | | |
| Demand | NTPLANT | UPDLTD | SICDT | \$ 128,785,004 | \$ 88,031,878 | \$ 16,421,375 | \$ 1,190,308 | \$ 12,132,517 | \$ - | \$ 10,354,458 | \$ - |
| Customer | NTPLANT | UPDLTC | PCust09 | \$ 106,998,058 | \$ 86,028,734 | \$ 16,094,788 | \$ 82,475 | \$ 864,042 | \$ - | \$ 148,805 | \$ - |
| Total Line Transformers | | UPDLTT | | \$ 235,783,062 | \$ 174,060,612 | \$ 32,516,164 | \$ 1,272,783 | \$ 12,996,559 | \$ - | \$ 10,503,263 | \$ - |
| Distribution Services | | | | | | | | | | | |
| Customer | NTPLANT | UPDSC | C02 | \$ 90,212,968 | \$ 71,346,150 | \$ 16,039,124 | \$ 145,118 | \$ 2,084,370 | \$ - | \$ 596,329 | \$ - |
| Distribution Meters | | | | | | | | | | | |
| Customer | NTPLANT | UPDMC | MNPA | \$ 53,653,152 | \$ 32,341,236 | \$ 13,050,653 | \$ 266,391 | \$ 4,080,451 | \$ 797,977 | \$ 729,838 | \$ 1,413,594 |
| Distribution Street & Customer Lighting | | | | | | | | | | | |
| Customer | NTPLANT | UPDSCL | PCust04 | \$ 103,312,451 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Customer Accounts Expense | | | | | | | | | | | |
| Customer | NTPLANT | UPCAE | PCust05 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Customer Service & Info. | | | | | | | | | | | |
| Customer | NTPLANT | UPCSI | PCust05 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Sales Expense | | | | | | | | | | | |
| Customer | NTPLANT | UPSEC | PCust06 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Total | | UPT | | \$ 6,291,008,281 | \$ 2,983,332,508 | \$ 738,649,578 | \$ 46,846,782 | \$ 555,179,106 | \$ 24,019,962 | \$ 513,037,149 | \$ 890,626,207 |

KENTUCKY UTILITIES COMPANY
Cost of Service Study
Class Allocation
12 Months Ended June 30, 2022

LOLP Methodology

| Description | Ref | Name | Allocation Vector | Retail Transmission | Fluctuating Load | Outdoor Lighting | Lighting Energy | Traffic Energy | Outdoor Sports | Electric Vehicle | Solar Share | Business Solar |
|--|---------|--------|----------------------|-------------------------------|-------------------------------|------------------|-----------------|----------------|-----------------|------------------|--------------|----------------|
| | | | | Service RTS - Transmission | Service FLS - Transmission | LS & RLS | LE | TE | Lighting OSL | Charging EV | SSP | BS |
| Net Utility Plant | | | | | | | | | | | | |
| Power Production Plant | | | | | | | | | | | | |
| Production Demand - LOLP | NTPLANT | UPPPDB | NPLOLPDA | \$ 217,184,547 | \$ 89,935,822 | \$ 586,207 | \$ 21,328 | \$ 348,762 | \$ 44,892 | \$ 3,036 | \$ 3,141,953 | \$ 371,427 |
| Production Energy | NTPLANT | UPPPEB | E01 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Total Power Production Plant | | UPPPTT | | \$ 217,184,547 | \$ 89,935,822 | \$ 586,207 | \$ 21,328 | \$ 348,762 | \$ 44,892 | \$ 3,036 | \$ 3,141,953 | \$ 371,427 |
| Transmission Plant | | | | | | | | | | | | |
| Transmission Demand | NTPLANT | UPTRB | NCPT | \$ 52,450,835 | \$ 35,146,083 | \$ 7,078,808 | \$ 257,549 | \$ 69,390 | \$ 97,712 | \$ 610 | \$ - | \$ - |
| Distribution Poles | | | | | | | | | | | | |
| Specific | NTPLANT | UPDPS | NCPP | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Distribution Substation | | | | | | | | | | | | |
| General | NTPLANT | UPDSG | NCPP | \$ - | \$ - | \$ 1,839,907 | \$ 66,941 | \$ 18,036 | \$ 25,397 | \$ 158 | \$ - | \$ - |
| Distribution Primary & Secondary Lines | | | | | | | | | | | | |
| Primary Specific | NTPLANT | UPDPLS | NCPP | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Primary Demand | NTPLANT | UPDPLD | NCPP | \$ - | \$ - | \$ 1,463,376 | \$ 53,242 | \$ 14,345 | \$ 20,200 | \$ 126 | \$ - | \$ - |
| Primary Customer | NTPLANT | UPDPLC | PCust08 | \$ - | \$ - | \$ 13,341,222 | \$ 8,315 | \$ 102,546 | \$ 2,772 | \$ 6,929 | \$ - | \$ - |
| Secondary Demand | NTPLANT | UPDSL | SICD | \$ - | \$ - | \$ 508,528 | \$ 18,502 | \$ 4,985 | \$ - | \$ 44 | \$ - | \$ - |
| Secondary Customer | NTPLANT | UPDPLC | PCust07 | \$ - | \$ - | \$ 6,302,521 | \$ 3,928 | \$ 48,444 | \$ - | \$ 6,546 | \$ - | \$ - |
| Total Distribution Primary & Secondary Lines | | UPDLT | | \$ - | \$ - | \$ 21,615,647 | \$ 83,986 | \$ 170,319 | \$ 22,971 | \$ 13,645 | \$ - | \$ - |
| Distribution Line Transformers | | | | | | | | | | | | |
| Demand | NTPLANT | UPDLTD | SICDT | \$ - | \$ - | \$ 611,778 | \$ 22,258 | \$ 5,997 | \$ 14,381 | \$ 53 | \$ - | \$ - |
| Customer | NTPLANT | UPDLTC | PCust09 | \$ - | \$ - | \$ 3,745,369 | \$ 2,334 | \$ 28,788 | \$ 778 | \$ 1,945 | \$ - | \$ - |
| Total Line Transformers | | UPDLTT | | \$ - | \$ - | \$ 4,357,147 | \$ 24,593 | \$ 34,785 | \$ 15,159 | \$ 1,998 | \$ - | \$ - |
| Distribution Services | | | | | | | | | | | | |
| Customer | NTPLANT | UPDSC | C02 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ 1,878 | \$ - | \$ - | \$ - |
| Distribution Meters | | | | | | | | | | | | |
| Customer | NTPLANT | UPDMC | MNPA | \$ 700,850 | \$ 43,263 | \$ - | \$ 7,896 | \$ 97,314 | \$ 3,676 | \$ 120,013 | \$ - | \$ - |
| Distribution Street & Customer Lighting | | | | | | | | | | | | |
| Customer | NTPLANT | UPDSCL | PCust04 | \$ - | \$ - | \$ 103,312,451 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Customer Accounts Expense | | | | | | | | | | | | |
| Customer | NTPLANT | UPCAE | PCust05 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Customer Service & Info. | | | | | | | | | | | | |
| Customer | NTPLANT | UPCSI | PCust05 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Sales Expense | | | | | | | | | | | | |
| Customer | NTPLANT | UPSEC | PCust06 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Total | | UPT | | \$ 270,336,232 | \$ 125,125,168 | \$ 138,790,167 | \$ 462,294 | \$ 738,606 | \$ 211,684 | \$ 139,460 | \$ 3,141,953 | \$ 371,427 |

KENTUCKY UTILITIES COMPANY
Cost of Service Study
Class Allocation
12 Months Ended June 30, 2022

LOLP Methodology

| Description | Ref | Name | Allocation Vector | Total System | Residential Rate RS | General Service GS | All Electric Schools AES | Power Service PS-Secondary | Power Service PS-Primary | Time of Day TOD-Secondary | Time of Day TOD-Primary |
|--|-----|--------|-------------------|------------------|---------------------|--------------------|--------------------------|----------------------------|--------------------------|---------------------------|-------------------------|
| Net Cost Rate Base | | | | | | | | | | | |
| Power Production Plant | | | | | | | | | | | |
| Production Demand - LOLP | RB | RBPPDB | RBLLOLPA | \$ 2,975,438,420 | \$ 1,219,918,258 | \$ 328,578,140 | \$ 21,083,962 | \$ 306,412,268 | \$ 13,312,137 | \$ 294,684,795 | \$ 539,453,131 |
| Production Energy | RB | RBPEEB | E01 | \$ 79,624,711 | \$ 27,493,896 | \$ 7,762,757 | \$ 594,640 | \$ 7,860,100 | \$ 355,222 | \$ 8,253,333 | \$ 17,832,601 |
| Total Power Production Plant | | RBPPPT | | \$ 3,055,063,131 | \$ 1,247,412,154 | \$ 336,340,897 | \$ 21,678,601 | \$ 314,272,367 | \$ 13,667,359 | \$ 302,938,128 | \$ 557,285,732 |
| Transmission Plant | | | | | | | | | | | |
| Transmission Demand | RB | RBTRB | NCPT | \$ 853,028,865 | \$ 377,164,232 | \$ 96,810,291 | \$ 9,907,981 | \$ 86,363,237 | \$ 3,711,099 | \$ 76,402,521 | \$ 124,431,809 |
| Distribution Poles | | | | | | | | | | | |
| Specific | RB | RBPPS | NCPP | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Distribution Substation | | | | | | | | | | | |
| General | RB | RBDSG | NCPP | \$ 200,340,313 | \$ 96,753,679 | \$ 24,834,677 | \$ 2,541,687 | \$ 22,154,702 | \$ 952,006 | \$ 19,599,486 | \$ 31,920,406 |
| Distribution Primary & Secondary Lines | | | | | | | | | | | |
| Primary Specific | RB | RBPLS | NCPP | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Primary Demand | RB | RBDPLD | NCPP | \$ 159,803,702 | \$ 77,176,659 | \$ 19,809,659 | \$ 2,027,406 | \$ 17,671,947 | \$ 759,378 | \$ 15,633,750 | \$ 25,461,670 |
| Primary Customer | RB | RBDPLC | PCust08 | \$ 310,404,048 | \$ 249,362,982 | \$ 46,652,371 | \$ 239,062 | \$ 2,504,512 | \$ 115,020 | \$ 431,326 | \$ 144,339 |
| Secondary Demand | RB | RBDSDL | SICD | \$ 71,898,861 | \$ 59,551,887 | \$ 11,108,747 | \$ 805,221 | \$ - | \$ - | \$ - | \$ - |
| Secondary Customer | RB | RBDSLC | PCust07 | \$ 145,014,673 | \$ 117,707,850 | \$ 22,021,513 | \$ 112,845 | \$ - | \$ - | \$ - | \$ - |
| Total Distribution Primary & Secondary Lines | | RBDLT | | \$ 687,121,284 | \$ 503,799,379 | \$ 99,592,291 | \$ 3,184,533 | \$ 20,176,458 | \$ 874,398 | \$ 16,065,076 | \$ 25,606,010 |
| Distribution Line Transformers | | | | | | | | | | | |
| Demand | RB | RBDLTD | SICDT | \$ 104,229,018 | \$ 71,246,464 | \$ 13,290,242 | \$ 963,347 | \$ 9,819,158 | \$ - | \$ 8,380,130 | \$ - |
| Customer | RB | RBDLTC | PCust09 | \$ 86,596,282 | \$ 69,625,269 | \$ 13,025,926 | \$ 66,749 | \$ 699,291 | \$ - | \$ 120,432 | \$ - |
| Total Line Transformers | | RBDLTT | | \$ 190,825,300 | \$ 140,871,733 | \$ 26,316,168 | \$ 1,030,096 | \$ 10,518,449 | \$ - | \$ 8,500,561 | \$ - |
| Distribution Services | | | | | | | | | | | |
| Customer | RB | RBDSCL | CO2 | \$ 73,005,398 | \$ 57,737,309 | \$ 12,979,759 | \$ 117,437 | \$ 1,686,789 | \$ - | \$ 482,583 | \$ - |
| Distribution Meters | | | | | | | | | | | |
| Customer | RB | RBDMC | MRBA | \$ 45,031,431 | \$ 27,151,049 | \$ 10,956,258 | \$ 223,640 | \$ 3,425,612 | \$ 669,916 | \$ 612,712 | \$ 1,186,737 |
| Distribution Street & Customer Lighting | | | | | | | | | | | |
| Customer | RB | RBDSCL | PCust04 | \$ 83,606,234 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Customer Accounts Expense | | | | | | | | | | | |
| Customer | RB | RBCAE | PCust05 | \$ 8,704,114 | \$ 5,654,852 | \$ 2,115,886 | \$ 54,213 | \$ 283,976 | \$ 13,042 | \$ 244,532 | \$ 81,830 |
| Customer Service & Info. | | | | | | | | | | | |
| Customer | RB | RBCSI | PCust05 | \$ 1,105,953 | \$ 718,511 | \$ 268,847 | \$ 6,888 | \$ 36,082 | \$ 1,657 | \$ 31,070 | \$ 10,397 |
| Sales Expense | | | | | | | | | | | |
| Customer | RB | RBSEC | PCust06 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Total | | RBT | | \$ 5,197,832,023 | \$ 2,457,262,896 | \$ 610,215,074 | \$ 38,745,077 | \$ 458,917,674 | \$ 19,889,476 | \$ 424,876,670 | \$ 740,522,922 |

KENTUCKY UTILITIES COMPANY
Cost of Service Study
Class Allocation
12 Months Ended June 30, 2022

LOLP Methodology

| Description | Ref | Name | Allocation Vector | Retail Transmission | Fluctuating Load | Outdoor Lighting | Lighting Energy | Traffic Energy | Outdoor Sports | Electric Vehicle | Solar Share | Business Solar |
|--|-----|--------|----------------------|-------------------------------|-------------------------------|------------------|-----------------|----------------|-----------------|------------------|--------------|----------------|
| | | | | Service RTS - Transmission | Service FLS - Transmission | LS & RLS | LE | TE | Lighting OSL | Charging EV | SSP | BS |
| Net Cost Rate Base | | | | | | | | | | | | |
| Power Production Plant | | | | | | | | | | | | |
| Production Demand - LOLP | RB | RBPPDB | RBLLOLPA | \$ 175,600,115 | \$ 72,715,766 | \$ 473,966 | \$ 17,244 | \$ 281,984 | \$ 36,296 | \$ 2,454 | \$ 2,576,969 | \$ 290,934 |
| Production Energy | RB | RBPEPB | E01 | \$ 6,206,391 | \$ 2,677,141 | \$ 555,781 | \$ 20,221 | \$ 11,068 | \$ 1,510 | \$ 51 | \$ - | \$ - |
| Total Power Production Plant | | RBPPPT | | \$ 181,806,506 | \$ 75,392,907 | \$ 1,029,746 | \$ 37,465 | \$ 293,052 | \$ 37,806 | \$ 2,505 | \$ 2,576,969 | \$ 290,934 |
| Transmission Plant | | | | | | | | | | | | |
| Transmission Demand | RB | RBTRB | NCPT | \$ 43,150,262 | \$ 28,913,985 | \$ 5,823,595 | \$ 211,880 | \$ 57,086 | \$ 80,386 | \$ 502 | \$ - | \$ - |
| Distribution Poles | | | | | | | | | | | | |
| Specific | RB | RBDPS | NCPP | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Distribution Substation | | | | | | | | | | | | |
| General | RB | RBDSC | NCPP | \$ - | \$ - | \$ 1,493,923 | \$ 54,354 | \$ 14,644 | \$ 20,621 | \$ 129 | \$ - | \$ - |
| Distribution Primary & Secondary Lines | | | | | | | | | | | | |
| Primary Specific | RB | RBDPLS | NCPP | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Primary Demand | RB | RBDPLD | NCPP | \$ - | \$ - | \$ 1,191,644 | \$ 43,356 | \$ 11,681 | \$ 16,449 | \$ 103 | \$ - | \$ - |
| Primary Customer | RB | RBDPLC | PCust08 | \$ - | \$ - | \$ 10,856,329 | \$ 6,766 | \$ 83,446 | \$ 2,255 | \$ 5,638 | \$ - | \$ - |
| Secondary Demand | RB | RBDSDL | SICD | \$ - | \$ - | \$ 413,856 | \$ 15,057 | \$ 4,057 | \$ - | \$ 36 | \$ - | \$ - |
| Secondary Customer | RB | RBDSLC | PCust07 | \$ - | \$ - | \$ 5,124,558 | \$ 3,194 | \$ 39,389 | \$ - | \$ 5,323 | \$ - | \$ - |
| Total Distribution Primary & Secondary Lines | | RBDLT | | \$ - | \$ - | \$ 17,586,389 | \$ 68,373 | \$ 138,573 | \$ 18,704 | \$ 11,099 | \$ - | \$ - |
| Distribution Line Transformers | | | | | | | | | | | | |
| Demand | RB | RBDLTD | SICDT | \$ - | \$ - | \$ 495,128 | \$ 18,014 | \$ 4,853 | \$ 11,639 | \$ 43 | \$ - | \$ - |
| Customer | RB | RBDLTC | PCust09 | \$ - | \$ - | \$ 3,031,223 | \$ 1,889 | \$ 23,299 | \$ 630 | \$ 1,574 | \$ - | \$ - |
| Total Line Transformers | | RBDLTT | | \$ - | \$ - | \$ 3,526,351 | \$ 19,903 | \$ 28,153 | \$ 12,268 | \$ 1,617 | \$ - | \$ - |
| Distribution Services | | | | | | | | | | | | |
| Customer | RB | RBDSC | C02 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ 1,519 | \$ - | \$ - | \$ - |
| Distribution Meters | | | | | | | | | | | | |
| Customer | RB | RBDMC | MRBA | \$ 588,376 | \$ 36,320 | \$ - | \$ 6,629 | \$ 81,697 | \$ 3,086 | \$ 89,399 | \$ - | \$ - |
| Distribution Street & Customer Lighting | | | | | | | | | | | | |
| Customer | RB | RBDSC | PCust04 | \$ - | \$ - | \$ 83,606,234 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Customer Accounts Expense | | | | | | | | | | | | |
| Customer | RB | RBCAE | PCust05 | \$ 6,393 | \$ 639 | \$ 246,194 | \$ 153 | \$ 1,892 | \$ 256 | \$ 256 | \$ - | \$ - |
| Customer Service & Info. | | | | | | | | | | | | |
| Customer | RB | RBCSI | PCust05 | \$ 812 | \$ 81 | \$ 31,282 | \$ 19 | \$ 240 | \$ 32 | \$ 32 | \$ - | \$ - |
| Sales Expense | | | | | | | | | | | | |
| Customer | RB | RBSEC | PCust06 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Total | | RBT | | \$ 225,552,349 | \$ 104,343,933 | \$ 113,343,713 | \$ 398,777 | \$ 615,338 | \$ 174,679 | \$ 105,539 | \$ 2,576,969 | \$ 290,934 |

KENTUCKY UTILITIES COMPANY
Cost of Service Study
Class Allocation
12 Months Ended June 30, 2022

LOLP Methodology

| Description | Ref | Name | Allocation Vector | Total System | Residential Rate RS | General Service GS | All Electric Schools AES | Power Service PS-Secondary | Power Service PS-Primary | Time of Day TOD-Secondary | Time of Day TOD-Primary |
|--|-----|---------|-------------------|----------------|---------------------|--------------------|--------------------------|----------------------------|--------------------------|---------------------------|-------------------------|
| Operation and Maintenance Expenses | | | | | | | | | | | |
| Power Production Plant | | | | | | | | | | | |
| Production Demand - LOLP | TOM | OMPPDB | POMLOLPDA | \$ 133,195,931 | \$ 54,624,948 | \$ 14,712,923 | \$ 944,088 | \$ 13,720,390 | \$ 596,085 | \$ 13,195,262 | \$ 24,155,388 |
| Production Energy | TOM | OMPPPEB | E01 | \$ 555,456,787 | \$ 191,795,621 | \$ 54,152,488 | \$ 4,148,168 | \$ 54,831,541 | \$ 2,478,006 | \$ 57,574,714 | \$ 124,399,061 |
| Total Power Production Plant | | OMPPT | | \$ 688,652,718 | \$ 246,420,569 | \$ 68,865,411 | \$ 5,092,256 | \$ 68,551,931 | \$ 3,074,090 | \$ 70,769,976 | \$ 148,554,449 |
| Transmission Plant | | | | | | | | | | | |
| Transmission Demand | TOM | OMTRB | NCPT | \$ 57,756,584 | \$ 25,536,905 | \$ 6,554,798 | \$ 670,846 | \$ 5,847,452 | \$ 251,270 | \$ 5,173,036 | \$ 8,424,986 |
| Distribution Poles | | | | | | | | | | | |
| Specific | TOM | OMDPS | NCPP | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Distribution Substation | | | | | | | | | | | |
| General | TOM | OMDSG | NCPP | \$ 9,282,793 | \$ 4,483,094 | \$ 1,150,718 | \$ 117,769 | \$ 1,026,541 | \$ 44,111 | \$ 908,145 | \$ 1,479,036 |
| Distribution Primary & Secondary Lines | | | | | | | | | | | |
| Primary Specific | TOM | OMDPLS | NCPP | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Primary Demand | TOM | OMDPLD | NCPP | \$ 12,963,444 | \$ 6,260,651 | \$ 1,606,980 | \$ 164,465 | \$ 1,433,567 | \$ 61,602 | \$ 1,268,226 | \$ 2,065,477 |
| Primary Customer | TOM | OMDPLC | Cust08 | \$ 23,791,490 | \$ 19,112,052 | \$ 3,576,807 | \$ 18,320 | \$ 191,880 | \$ 8,814 | \$ 33,096 | \$ 11,061 |
| Secondary Demand | TOM | OMDSL D | SICD | \$ 5,561,431 | \$ 4,606,384 | \$ 859,270 | \$ 62,284 | \$ - | \$ - | \$ - | \$ - |
| Secondary Customer | TOM | OMDSL C | Cust07 | \$ 10,375,667 | \$ 8,341,894 | \$ 1,561,180 | \$ 7,996 | \$ 83,750 | \$ - | \$ 14,446 | \$ - |
| Total Distribution Primary & Secondary Lines | | OMDLT | | \$ 52,692,031 | \$ 38,320,981 | \$ 7,604,237 | \$ 253,065 | \$ 1,709,197 | \$ 70,416 | \$ 1,315,768 | \$ 2,076,538 |
| Distribution Line Transformers | | | | | | | | | | | |
| Demand | TOM | OMDLTD | SICDT | \$ 2,648,296 | \$ 1,810,261 | \$ 337,684 | \$ 24,477 | \$ 249,489 | \$ - | \$ 212,926 | \$ - |
| Customer | TOM | OMDLTC | Cust09 | \$ 2,200,276 | \$ 1,768,991 | \$ 331,066 | \$ 1,696 | \$ 17,760 | \$ - | \$ 3,063 | \$ - |
| Total Line Transformers | | OMDLTT | | \$ 4,848,571 | \$ 3,579,252 | \$ 668,750 | \$ 26,173 | \$ 267,250 | \$ - | \$ 215,989 | \$ - |
| Distribution Services | | | | | | | | | | | |
| Customer | TOM | OMDSC | C02 | \$ 1,814,383 | \$ 1,434,929 | \$ 322,582 | \$ 2,919 | \$ 41,921 | \$ - | \$ 11,994 | \$ - |
| Distribution Meters | | | | | | | | | | | |
| Customer | TOM | OMDMC | MOMA | \$ 11,537,188 | \$ 6,970,017 | \$ 2,812,610 | \$ 57,411 | \$ 879,398 | \$ 171,976 | \$ 157,291 | \$ 304,650 |
| Distribution Street & Customer Lighting | | | | | | | | | | | |
| Customer | TOM | OMDSCL | C04 | \$ 2,077,842 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Customer Accounts Expense | | | | | | | | | | | |
| Customer | TOM | OMCAE | C05 | \$ 56,459,203 | \$ 36,676,717 | \$ 13,728,044 | \$ 351,559 | \$ 1,841,124 | \$ 84,573 | \$ 1,587,819 | \$ 530,655 |
| Customer Service & Info. | | | | | | | | | | | |
| Customer | TOM | OMCSI | C10 | \$ 7,173,760 | \$ 5,742,083 | \$ 1,074,627 | \$ 5,504 | \$ 57,649 | \$ 2,648 | \$ 9,944 | \$ 3,323 |
| Sales Expense | | | | | | | | | | | |
| Customer | TOM | OMSEC | C06 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Total | | OMT | | \$ 892,295,073 | \$ 369,164,547 | \$ 102,781,777 | \$ 6,577,503 | \$ 80,222,463 | \$ 3,699,084 | \$ 80,149,961 | \$ 161,373,638 |

KENTUCKY UTILITIES COMPANY
Cost of Service Study
Class Allocation
12 Months Ended June 30, 2022

LOLP Methodology

| Description | Ref | Name | Allocation Vector | Retail Transmission | Fluctuating Load | Outdoor Lighting | Lighting Energy | Traffic Energy | Outdoor Sports | Electric Vehicle | Solar Share | Business Solar |
|--|-----|---------|----------------------|-------------------------------|-------------------------------|------------------|-----------------|----------------|-----------------|------------------|-------------|----------------|
| | | | | Service RTS - Transmission | Service FLS - Transmission | LS & RLS | LE | TE | Lighting OSL | Charging EV | SSP | BS |
| Operation and Maintenance Expenses | | | | | | | | | | | | |
| Power Production Plant | | | | | | | | | | | | |
| Production Demand - LOLP | TOM | OMPPDB | POMLOLPDA | \$ 7,862,942 | \$ 3,256,034 | \$ 21,223 | \$ 772 | \$ 12,627 | \$ 1,625 | \$ 110 | \$ 91,514 | \$ - |
| Production Energy | TOM | OMPPPEB | E01 | \$ 43,295,379 | \$ 18,675,564 | \$ 3,877,090 | \$ 141,060 | \$ 77,209 | \$ 10,533 | \$ 353 | \$ - | \$ - |
| Total Power Production Plant | | OMPPPT | | \$ 51,158,321 | \$ 21,931,598 | \$ 3,898,313 | \$ 141,833 | \$ 89,835 | \$ 12,158 | \$ 463 | \$ 91,514 | \$ - |
| Transmission Plant | | | | | | | | | | | | |
| Transmission Demand | TOM | OMTRB | NCPT | \$ 2,921,603 | \$ 1,957,698 | \$ 394,302 | \$ 14,346 | \$ 3,865 | \$ 5,443 | \$ 34 | \$ - | \$ - |
| Distribution Poles | | | | | | | | | | | | |
| Specific | TOM | OMDPS | NCPP | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Distribution Substation | | | | | | | | | | | | |
| General | TOM | OMDSG | NCPP | \$ - | \$ - | \$ 69,221 | \$ 2,518 | \$ 679 | \$ 955 | \$ 6 | \$ - | \$ - |
| Distribution Primary & Secondary Lines | | | | | | | | | | | | |
| Primary Specific | TOM | OMDPLS | NCPP | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Primary Demand | TOM | OMDPLD | NCPP | \$ - | \$ - | \$ 96,667 | \$ 3,517 | \$ 948 | \$ 1,334 | \$ 8 | \$ - | \$ - |
| Primary Customer | TOM | OMDPLC | Cust08 | \$ - | \$ - | \$ 831,941 | \$ 518 | \$ 6,395 | \$ 173 | \$ 432 | \$ - | \$ - |
| Secondary Demand | TOM | OMDSL D | SICD | \$ - | \$ - | \$ 32,012 | \$ 1,165 | \$ 314 | \$ - | \$ 3 | \$ - | \$ - |
| Secondary Customer | TOM | OMDSL C | Cust07 | \$ - | \$ - | \$ 363,120 | \$ 226 | \$ 2,791 | \$ 75 | \$ 189 | \$ - | \$ - |
| Total Distribution Primary & Secondary Lines | | OMDLT | | \$ - | \$ - | \$ 1,323,741 | \$ 5,427 | \$ 10,447 | \$ 1,583 | \$ 632 | \$ - | \$ - |
| Distribution Line Transformers | | | | | | | | | | | | |
| Demand | TOM | OMDLTD | SICDT | \$ - | \$ - | \$ 12,580 | \$ 458 | \$ 123 | \$ 296 | \$ 1 | \$ - | \$ - |
| Customer | TOM | OMDLTC | Cust09 | \$ - | \$ - | \$ 77,004 | \$ 48 | \$ 592 | \$ 16 | \$ 40 | \$ - | \$ - |
| Total Line Transformers | | OMDLTT | | \$ - | \$ - | \$ 89,584 | \$ 506 | \$ 715 | \$ 312 | \$ 41 | \$ - | \$ - |
| Distribution Services | | | | | | | | | | | | |
| Customer | TOM | OMDSC | C02 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ 38 | \$ - | \$ - | \$ - |
| Distribution Meters | | | | | | | | | | | | |
| Customer | TOM | OMDMC | MOMA | \$ 151,044 | \$ 9,324 | \$ - | \$ 1,702 | \$ 20,973 | \$ 792 | \$ - | \$ - | \$ - |
| Distribution Street & Customer Lighting | | | | | | | | | | | | |
| Customer | TOM | OMDSCL | C04 | \$ - | \$ - | \$ 2,077,842 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Customer Accounts Expense | | | | | | | | | | | | |
| Customer | TOM | OMCAE | C05 | \$ 41,457 | \$ 4,146 | \$ 1,596,525 | \$ 995 | \$ 12,271 | \$ 1,658 | \$ 1,658 | \$ - | \$ - |
| Customer Service & Info. | | | | | | | | | | | | |
| Customer | TOM | OMCSI | C10 | \$ 260 | \$ 13 | \$ 249,951 | \$ 156 | \$ 1,921 | \$ 52 | \$ 18,630 | \$ - | \$ 7,000 |
| Sales Expense | | | | | | | | | | | | |
| Customer | TOM | OMSEC | C06 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Total | | OMT | | \$ 54,272,685 | \$ 23,902,778 | \$ 9,699,480 | \$ 167,482 | \$ 140,707 | \$ 22,991 | \$ 21,464 | \$ 91,514 | \$ 7,000 |

KENTUCKY UTILITIES COMPANY
Cost of Service Study
Class Allocation
12 Months Ended June 30, 2022

LOLP Methodology

| Description | Ref | Name | Allocation Vector | Total System | Residential Rate RS | General Service GS | All Electric Schools AES | Power Service PS-Secondary | Power Service PS-Primary | Time of Day TOD-Secondary | Time of Day TOD-Primary |
|--|-----|--------|-------------------|----------------|---------------------|--------------------|--------------------------|----------------------------|--------------------------|---------------------------|-------------------------|
| Labor Expenses | | | | | | | | | | | |
| Power Production Plant | | | | | | | | | | | |
| Production Demand - LOLP | TLB | LBPPDB | LOLP | \$ 57,141,438 | \$ 23,450,372 | \$ 6,316,226 | \$ 405,295 | \$ 5,890,134 | \$ 255,898 | \$ 5,664,698 | \$ 10,369,856 |
| Production Energy | TLB | LBPEEB | E01 | \$ 38,829,580 | \$ 13,407,602 | \$ 3,785,566 | \$ 289,980 | \$ 3,833,036 | \$ 173,227 | \$ 4,024,799 | \$ 8,696,200 |
| Total Power Production Plant | | LBPPT | | \$ 95,971,017 | \$ 36,857,973 | \$ 10,101,792 | \$ 695,275 | \$ 9,723,169 | \$ 429,125 | \$ 9,689,497 | \$ 19,066,056 |
| Transmission Plant | | | | | | | | | | | |
| Transmission Demand | TLB | LBTRB | NCPT | \$ 12,471,453 | \$ 5,514,217 | \$ 1,415,386 | \$ 144,857 | \$ 1,262,648 | \$ 54,257 | \$ 1,117,020 | \$ 1,819,218 |
| Distribution Poles | | | | | | | | | | | |
| Specific | TLB | LBGPS | NCPP | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Distribution Substation | | | | | | | | | | | |
| General | TLB | LBDSG | NCPP | \$ 5,205,663 | \$ 2,514,057 | \$ 645,307 | \$ 66,043 | \$ 575,670 | \$ 24,737 | \$ 509,275 | \$ 829,423 |
| Distribution Primary & Secondary Lines | | | | | | | | | | | |
| Primary Specific | TLB | LBGPLS | NCPP | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Primary Demand | TLB | LBGPLD | NCPP | \$ 4,140,341 | \$ 1,999,564 | \$ 513,247 | \$ 52,528 | \$ 457,861 | \$ 19,675 | \$ 405,054 | \$ 659,684 |
| Primary Customer | TLB | LBGPLC | Cust08 | \$ 8,047,851 | \$ 6,464,957 | \$ 1,209,912 | \$ 6,197 | \$ 64,907 | \$ 2,982 | \$ 11,195 | \$ 3,742 |
| Secondary Demand | TLB | LBDSL | SICD | \$ 1,863,918 | \$ 1,543,833 | \$ 287,985 | \$ 20,875 | \$ - | \$ - | \$ - | \$ - |
| Secondary Customer | TLB | LBDSL | Cust07 | \$ 3,762,788 | \$ 3,025,230 | \$ 566,170 | \$ 2,900 | \$ 30,373 | \$ - | \$ 5,239 | \$ - |
| Total Distribution Primary & Secondary Lines | | LBDLT | | \$ 17,814,899 | \$ 13,033,584 | \$ 2,577,314 | \$ 82,499 | \$ 553,140 | \$ 22,656 | \$ 421,488 | \$ 663,426 |
| Distribution Line Transformers | | | | | | | | | | | |
| Demand | TLB | LBDLTD | SICDT | \$ 2,717,098 | \$ 1,857,291 | \$ 346,457 | \$ 25,113 | \$ 255,971 | \$ - | \$ 218,458 | \$ - |
| Customer | TLB | LBDLTC | Cust09 | \$ 2,257,438 | \$ 1,814,949 | \$ 339,667 | \$ 1,740 | \$ 18,222 | \$ - | \$ 3,143 | \$ - |
| Total Line Transformers | | LBDLTT | | \$ 4,974,536 | \$ 3,672,240 | \$ 686,124 | \$ 26,853 | \$ 274,193 | \$ - | \$ 221,601 | \$ - |
| Distribution Services | | | | | | | | | | | |
| Customer | TLB | LBDESC | C02 | \$ 1,903,307 | \$ 1,505,256 | \$ 338,392 | \$ 3,062 | \$ 43,976 | \$ - | \$ 12,581 | \$ - |
| Distribution Meters | | | | | | | | | | | |
| Customer | TLB | LBDMC | C03 | \$ 1,131,971 | \$ 683,863 | \$ 275,959 | \$ 5,633 | \$ 86,282 | \$ 16,873 | \$ 15,433 | \$ 29,891 |
| Distribution Street & Customer Lighting | | | | | | | | | | | |
| Customer | TLB | LBDSCL | C04 | \$ 2,179,679 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Customer Accounts Expense | | | | | | | | | | | |
| Customer | TLB | LBCAE | C05 | \$ 28,207,728 | \$ 18,324,149 | \$ 6,858,704 | \$ 175,643 | \$ 919,849 | \$ 42,254 | \$ 793,294 | \$ 265,122 |
| Customer Service & Info. | | | | | | | | | | | |
| Customer | TLB | LBCSI | C05 | \$ 3,368,178 | \$ 2,188,017 | \$ 818,972 | \$ 20,973 | \$ 109,836 | \$ 5,045 | \$ 94,724 | \$ 31,657 |
| Sales Expense | | | | | | | | | | | |
| Customer | TLB | LBSEC | C06 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Total | | LBT | | \$ 173,228,432 | \$ 84,293,357 | \$ 23,717,949 | \$ 1,220,838 | \$ 13,548,762 | \$ 594,947 | \$ 12,874,913 | \$ 22,704,793 |

KENTUCKY UTILITIES COMPANY
Cost of Service Study
Class Allocation
12 Months Ended June 30, 2022

LOLP Methodology

| Description | Ref | Name | Allocation Vector | Retail Transmission | Fluctuating Load | Outdoor Lighting | Lighting Energy | Traffic Energy | Outdoor Sports | Electric Vehicle | Solar Share | Business Solar |
|--|-----|--------|----------------------|-------------------------------|-------------------------------|------------------|-----------------|----------------|-----------------|------------------|-------------|----------------|
| | | | | Service RTS - Transmission | Service FLS - Transmission | LS & RLS | LE | TE | Lighting OSL | Charging EV | SSP | BS |
| Labor Expenses | | | | | | | | | | | | |
| Power Production Plant | | | | | | | | | | | | |
| Production Demand - LOLP | TLB | LBPPDB | LOLP | \$ 3,375,544 | \$ 1,397,808 | \$ 9,111 | \$ 331 | \$ 5,421 | \$ 698 | \$ 47 | \$ - | \$ - |
| Production Energy | TLB | LBPEEB | E01 | \$ 3,026,593 | \$ 1,305,528 | \$ 271,031 | \$ 9,861 | \$ 5,397 | \$ 736 | \$ 25 | \$ - | \$ - |
| Total Power Production Plant | | LBPPT | | \$ 6,402,137 | \$ 2,703,336 | \$ 280,142 | \$ 10,192 | \$ 10,818 | \$ 1,434 | \$ 72 | \$ - | \$ - |
| Transmission Plant | | | | | | | | | | | | |
| Transmission Demand | TLB | LBTRB | NCPT | \$ 630,865 | \$ 422,728 | \$ 85,142 | \$ 3,098 | \$ 835 | \$ 1,175 | \$ 7 | \$ - | \$ - |
| Distribution Poles | | | | | | | | | | | | |
| Specific | TLB | LBGPS | NCPP | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Distribution Substation | | | | | | | | | | | | |
| General | TLB | LBDSG | NCPP | \$ - | \$ - | \$ 38,818 | \$ 1,412 | \$ 381 | \$ 536 | \$ 3 | \$ - | \$ - |
| Distribution Primary & Secondary Lines | | | | | | | | | | | | |
| Primary Specific | TLB | LBPLS | NCPP | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Primary Demand | TLB | LBPLD | NCPP | \$ - | \$ - | \$ 30,874 | \$ 1,123 | \$ 303 | \$ 426 | \$ 3 | \$ - | \$ - |
| Primary Customer | TLB | LBPLC | Cust08 | \$ - | \$ - | \$ 281,417 | \$ 175 | \$ 2,163 | \$ 58 | \$ 146 | \$ - | \$ - |
| Secondary Demand | TLB | LBDSL | SICD | \$ - | \$ - | \$ 10,729 | \$ 390 | \$ 105 | \$ - | \$ 1 | \$ - | \$ - |
| Secondary Customer | TLB | LBDSL | Cust07 | \$ - | \$ - | \$ 131,687 | \$ 82 | \$ 1,012 | \$ 27 | \$ 68 | \$ - | \$ - |
| Total Distribution Primary & Secondary Lines | | LBDLT | | \$ - | \$ - | \$ 454,708 | \$ 1,771 | \$ 3,583 | \$ 512 | \$ 218 | \$ - | \$ - |
| Distribution Line Transformers | | | | | | | | | | | | |
| Demand | TLB | LBDLTD | SICDT | \$ - | \$ - | \$ 12,907 | \$ 470 | \$ 127 | \$ 303 | \$ 1 | \$ - | \$ - |
| Customer | TLB | LBDLTC | Cust09 | \$ - | \$ - | \$ 79,004 | \$ 49 | \$ 607 | \$ 16 | \$ 41 | \$ - | \$ - |
| Total Line Transformers | | LBDLTT | | \$ - | \$ - | \$ 91,911 | \$ 519 | \$ 734 | \$ 320 | \$ 42 | \$ - | \$ - |
| Distribution Services | | | | | | | | | | | | |
| Customer | TLB | LBDS | C02 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ 40 | \$ - | \$ - | \$ - |
| Distribution Meters | | | | | | | | | | | | |
| Customer | TLB | LBDMC | C03 | \$ 14,820 | \$ 915 | \$ - | \$ 167 | \$ 2,058 | \$ 78 | \$ - | \$ - | \$ - |
| Distribution Street & Customer Lighting | | | | | | | | | | | | |
| Customer | TLB | LBDSCL | C04 | \$ - | \$ - | \$ 2,179,679 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Customer Accounts Expense | | | | | | | | | | | | |
| Customer | TLB | LBCAE | C05 | \$ 20,713 | \$ 2,071 | \$ 797,644 | \$ 497 | \$ 6,131 | \$ 829 | \$ 829 | \$ - | \$ - |
| Customer Service & Info. | | | | | | | | | | | | |
| Customer | TLB | LBCSI | C05 | \$ 2,473 | \$ 247 | \$ 95,244 | \$ 59 | \$ 732 | \$ 99 | \$ 99 | \$ - | \$ - |
| Sales Expense | | | | | | | | | | | | |
| Customer | TLB | LBSEC | C06 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Total | | LBT | | \$ 7,071,008 | \$ 3,129,298 | \$ 4,023,288 | \$ 17,716 | \$ 25,271 | \$ 5,022 | \$ 1,270 | \$ - | \$ - |

KENTUCKY UTILITIES COMPANY
Cost of Service Study
Class Allocation
12 Months Ended June 30, 2022

LOLP Methodology

| Description | Ref | Name | Allocation Vector | Total System | Residential Rate RS | General Service GS | All Electric Schools AES | Power Service PS-Secondary | Power Service PS-Primary | Time of Day TOD-Secondary | Time of Day TOD-Primary |
|--|-------|--------|-------------------|----------------|---------------------|--------------------|--------------------------|----------------------------|--------------------------|---------------------------|-------------------------|
| Depreciation Expenses | | | | | | | | | | | |
| Power Production Plant | | | | | | | | | | | |
| Production Demand - LOLP | TDEPR | DEPPDB | PDEPLOLPDA | \$ 288,540,356 | \$ 118,364,937 | \$ 31,880,932 | \$ 2,045,712 | \$ 29,730,245 | \$ 1,291,636 | \$ 28,592,364 | \$ 52,341,487 |
| Production Energy | TDEPR | DEPPEB | E01 | - | - | - | - | - | - | - | - |
| Total Power Production Plant | | DEPPT | | \$ 288,540,356 | \$ 118,364,937 | \$ 31,880,932 | \$ 2,045,712 | \$ 29,730,245 | \$ 1,291,636 | \$ 28,592,364 | \$ 52,341,487 |
| Transmission Plant | | | | | | | | | | | |
| Transmission Demand | TDEPR | DETRB | NCPT | \$ 35,077,933 | \$ 15,509,606 | \$ 3,980,996 | \$ 407,432 | \$ 3,551,397 | \$ 152,606 | \$ 3,141,796 | \$ 5,116,838 |
| Distribution Poles | | | | | | | | | | | |
| Specific | TDEPR | DEDPS | NCPP | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Distribution Substation | | | | | | | | | | | |
| General | TDEPR | DEDSG | NCPP | \$ 7,353,572 | \$ 3,551,383 | \$ 911,567 | \$ 93,294 | \$ 813,197 | \$ 34,944 | \$ 719,407 | \$ 1,171,651 |
| Distribution Primary & Secondary Lines | | | | | | | | | | | |
| Primary Specific | TDEPR | DEDPLS | NCPP | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Primary Demand | TDEPR | DEDPLD | NCPP | \$ 5,848,688 | \$ 2,824,604 | \$ 725,018 | \$ 74,201 | \$ 646,779 | \$ 27,793 | \$ 572,183 | \$ 931,877 |
| Primary Customer | TDEPR | DEDPLC | Cust08 | \$ 11,368,475 | \$ 9,132,463 | \$ 1,709,134 | \$ 8,754 | \$ 91,688 | \$ 4,212 | \$ 15,815 | \$ 5,285 |
| Secondary Demand | TDEPR | DEDSL | SICD | \$ 2,632,990 | \$ 2,180,834 | \$ 406,811 | \$ 29,488 | \$ - | \$ - | \$ - | \$ - |
| Secondary Customer | TDEPR | DEDSL | Cust07 | \$ 5,315,352 | \$ 4,273,470 | \$ 799,777 | \$ 4,096 | \$ 42,905 | \$ - | \$ 7,400 | \$ - |
| Total Distribution Primary & Secondary Lines | | DEDLT | | \$ 25,165,505 | \$ 18,411,371 | \$ 3,640,739 | \$ 116,539 | \$ 781,371 | \$ 32,004 | \$ 595,398 | \$ 937,162 |
| Distribution Line Transformers | | | | | | | | | | | |
| Demand | TDEPR | DEDLTD | SICDT | \$ 3,838,199 | \$ 2,623,628 | \$ 489,409 | \$ 35,475 | \$ 361,587 | \$ - | \$ 308,596 | \$ - |
| Customer | TDEPR | DEDLTC | Cust09 | \$ 3,188,880 | \$ 2,563,816 | \$ 479,816 | \$ 2,458 | \$ 25,740 | \$ - | \$ 4,440 | \$ - |
| Total Line Transformers | | DEDLTT | | \$ 7,027,079 | \$ 5,187,443 | \$ 969,225 | \$ 37,932 | \$ 387,327 | \$ - | \$ 313,035 | \$ - |
| Distribution Services | | | | | | | | | | | |
| Customer | TDEPR | DEDESC | C02 | \$ 2,688,631 | \$ 2,126,340 | \$ 478,016 | \$ 4,325 | \$ 62,121 | \$ - | \$ 17,772 | \$ - |
| Distribution Meters | | | | | | | | | | | |
| Customer | TDEPR | DEDMC | MDA | \$ 1,599,033 | \$ 956,412 | \$ 385,941 | \$ 7,878 | \$ 120,669 | \$ 23,598 | \$ 21,583 | \$ 41,804 |
| Distribution Street & Customer Lighting | | | | | | | | | | | |
| Customer | TDEPR | DEDSCL | C04 | \$ 3,079,037 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Customer Accounts Expense | | | | | | | | | | | |
| Customer | TDEPR | DECAE | C05 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Customer Service & Info. | | | | | | | | | | | |
| Customer | TDEPR | DECSI | C05 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Sales Expense | | | | | | | | | | | |
| Customer | TDEPR | DESEC | C06 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Total | | DET | | \$ 370,531,145 | \$ 164,107,492 | \$ 42,247,417 | \$ 2,713,113 | \$ 35,446,328 | \$ 1,534,789 | \$ 33,401,356 | \$ 59,608,942 |

KENTUCKY UTILITIES COMPANY
Cost of Service Study
Class Allocation
12 Months Ended June 30, 2022

LOLP Methodology

| Description | Ref | Name | Allocation Vector | Retail Transmission | Fluctuating Load | Outdoor Lighting | Lighting Energy | Traffic Energy | Outdoor Sports | Electric Vehicle | Solar Share | Business Solar |
|--|-------|--------|----------------------|-------------------------------|-------------------------------|------------------|-----------------|----------------|-----------------|------------------|-------------|----------------|
| | | | | Service RTS - Transmission | Service FLS - Transmission | LS & RLS | LE | TE | Lighting OSL | Charging EV | SSP | BS |
| Depreciation Expenses | | | | | | | | | | | | |
| Power Production Plant | | | | | | | | | | | | |
| Production Demand - LOLP | TDEPR | DEPPDB | PDEPLOLPDA | \$ 17,037,942 | \$ 7,055,388 | \$ 45,987 | \$ 1,673 | \$ 27,360 | \$ 3,522 | \$ 238 | \$ 106,487 | \$ 14,444 |
| Production Energy | TDEPR | DEPPEB | E01 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Total Power Production Plant | | DEPPT | | \$ 17,037,942 | \$ 7,055,388 | \$ 45,987 | \$ 1,673 | \$ 27,360 | \$ 3,522 | \$ 238 | \$ 106,487 | \$ 14,444 |
| Transmission Plant | | | | | | | | | | | | |
| Transmission Demand | TDEPR | DETRB | NCPT | \$ 1,774,409 | \$ 1,188,990 | \$ 239,476 | \$ 8,713 | \$ 2,347 | \$ 3,306 | \$ 21 | \$ - | \$ - |
| Distribution Poles | | | | | | | | | | | | |
| Specific | TDEPR | DEDPS | NCPP | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Distribution Substation | | | | | | | | | | | | |
| General | TDEPR | DEDSG | NCPP | \$ - | \$ - | \$ 54,835 | \$ 1,995 | \$ 538 | \$ 757 | \$ 5 | \$ - | \$ - |
| Distribution Primary & Secondary Lines | | | | | | | | | | | | |
| Primary Specific | TDEPR | DEDPLS | NCPP | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Primary Demand | TDEPR | DEDPLD | NCPP | \$ - | \$ - | \$ 43,613 | \$ 1,587 | \$ 428 | \$ 602 | \$ 4 | \$ - | \$ - |
| Primary Customer | TDEPR | DEDPLC | Cust08 | \$ - | \$ - | \$ 397,533 | \$ 248 | \$ 3,056 | \$ 83 | \$ 206 | \$ - | \$ - |
| Secondary Demand | TDEPR | DEDSL | SICD | \$ - | \$ - | \$ 15,156 | \$ 551 | \$ 149 | \$ - | \$ 1 | \$ - | \$ - |
| Secondary Customer | TDEPR | DEDSL | Cust07 | \$ - | \$ - | \$ 186,023 | \$ 116 | \$ 1,430 | \$ 39 | \$ 97 | \$ - | \$ - |
| Total Distribution Primary & Secondary Lines | | DEDLT | | \$ - | \$ - | \$ 642,325 | \$ 2,502 | \$ 5,061 | \$ 723 | \$ 308 | \$ - | \$ - |
| Distribution Line Transformers | | | | | | | | | | | | |
| Demand | TDEPR | DEDLTD | SICDT | \$ - | \$ - | \$ 18,233 | \$ 663 | \$ 179 | \$ 429 | \$ 2 | \$ - | \$ - |
| Customer | TDEPR | DEDLTC | Cust09 | \$ - | \$ - | \$ 111,602 | \$ 70 | \$ 858 | \$ 23 | \$ 58 | \$ - | \$ - |
| Total Line Transformers | | DEDLTT | | \$ - | \$ - | \$ 129,835 | \$ 733 | \$ 1,037 | \$ 452 | \$ 60 | \$ - | \$ - |
| Distribution Services | | | | | | | | | | | | |
| Customer | TDEPR | DEDESC | C02 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ 56 | \$ - | \$ - | \$ - |
| Distribution Meters | | | | | | | | | | | | |
| Customer | TDEPR | DEDMC | MDA | \$ 20,726 | \$ 1,279 | \$ - | \$ 234 | \$ 2,878 | \$ 109 | \$ 15,923 | \$ - | \$ - |
| Distribution Street & Customer Lighting | | | | | | | | | | | | |
| Customer | TDEPR | DEDSCL | C04 | \$ - | \$ - | \$ 3,079,037 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Customer Accounts Expense | | | | | | | | | | | | |
| Customer | TDEPR | DECAE | C05 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Customer Service & Info. | | | | | | | | | | | | |
| Customer | TDEPR | DECSI | C05 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Sales Expense | | | | | | | | | | | | |
| Customer | TDEPR | DESEC | C06 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Total | | DET | | \$ 18,833,077 | \$ 8,245,658 | \$ 4,191,495 | \$ 15,849 | \$ 39,221 | \$ 8,924 | \$ 16,555 | \$ 106,487 | \$ 14,444 |

KENTUCKY UTILITIES COMPANY
Cost of Service Study
Class Allocation
12 Months Ended June 30, 2022

LOLP Methodology

| Description | Ref | Name | Allocation Vector | Total System | Residential Rate RS | General Service GS | All Electric Schools AES | Power Service PS-Secondary | Power Service PS-Primary | Time of Day TOD-Secondary | Time of Day TOD-Primary |
|--|------|--------|-------------------|---------------|---------------------|--------------------|--------------------------|----------------------------|--------------------------|---------------------------|-------------------------|
| Property Taxes | | | | | | | | | | | |
| Power Production Plant | | | | | | | | | | | |
| Production Demand - LOLP | PTAX | PTPPDB | PPTLOLPDA | \$ 22,386,637 | \$ 9,185,399 | \$ 2,474,036 | \$ 158,752 | \$ 2,307,137 | \$ 100,234 | \$ 2,218,835 | \$ 4,061,823 |
| Production Energy | PTAX | PTPPEB | E01 | - | - | - | - | - | - | - | - |
| Total Power Production Plant | | PTPPT | | \$ 22,386,637 | \$ 9,185,399 | \$ 2,474,036 | \$ 158,752 | \$ 2,307,137 | \$ 100,234 | \$ 2,218,835 | \$ 4,061,823 |
| Transmission Plant | | | | | | | | | | | |
| Transmission Demand | PTAX | PTTRB | NCPT | \$ 5,118,215 | \$ 2,263,004 | \$ 580,866 | \$ 59,448 | \$ 518,184 | \$ 22,267 | \$ 458,419 | \$ 746,597 |
| Distribution Poles | | | | | | | | | | | |
| Specific | PTAX | PTDPS | NCPP | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Distribution Substation | | | | | | | | | | | |
| General | PTAX | PTDSG | NCPP | \$ 1,318,249 | \$ 636,644 | \$ 163,413 | \$ 16,724 | \$ 145,779 | \$ 6,264 | \$ 128,966 | \$ 210,038 |
| Distribution Primary & Secondary Lines | | | | | | | | | | | |
| Primary Specific | PTAX | PTDPLS | NCPP | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Primary Demand | PTAX | PTDPLD | NCPP | \$ 1,048,474 | \$ 506,357 | \$ 129,971 | \$ 13,302 | \$ 115,946 | \$ 4,982 | \$ 102,573 | \$ 167,054 |
| Primary Customer | PTAX | PTDPLC | Cust08 | \$ 2,037,987 | \$ 1,637,145 | \$ 306,391 | \$ 1,569 | \$ 16,437 | \$ 755 | \$ 2,835 | \$ 947 |
| Secondary Demand | PTAX | PTDSL | SICD | \$ 472,007 | \$ 390,951 | \$ 72,928 | \$ 5,286 | \$ - | \$ - | \$ - | \$ - |
| Secondary Customer | PTAX | PTDSL | Cust07 | \$ 952,865 | \$ 766,090 | \$ 143,373 | \$ 734 | \$ 7,691 | \$ - | \$ 1,327 | \$ - |
| Total Distribution Primary & Secondary Lines | | PTDLT | | \$ 4,511,333 | \$ 3,300,543 | \$ 652,663 | \$ 20,892 | \$ 140,074 | \$ 5,737 | \$ 106,735 | \$ 168,002 |
| Distribution Line Transformers | | | | | | | | | | | |
| Demand | PTAX | PTDLTD | SICDT | \$ 688,061 | \$ 470,329 | \$ 87,735 | \$ 6,359 | \$ 64,821 | \$ - | \$ 55,321 | \$ - |
| Customer | PTAX | PTDLTC | Cust09 | \$ 571,659 | \$ 459,606 | \$ 86,015 | \$ 441 | \$ 4,614 | \$ - | \$ 796 | \$ - |
| Total Line Transformers | | PTDLTT | | \$ 1,259,720 | \$ 929,935 | \$ 173,750 | \$ 6,800 | \$ 69,435 | \$ - | \$ 56,117 | \$ - |
| Distribution Services | | | | | | | | | | | |
| Customer | PTAX | PTDSC | C02 | \$ 481,982 | \$ 381,182 | \$ 85,692 | \$ 775 | \$ 11,136 | \$ - | \$ 3,186 | \$ - |
| Distribution Meters | | | | | | | | | | | |
| Customer | PTAX | PTDMC | MPTA | \$ 286,653 | \$ 171,977 | \$ 69,398 | \$ 1,417 | \$ 21,698 | \$ 4,243 | \$ 3,881 | \$ 7,517 |
| Distribution Street & Customer Lighting | | | | | | | | | | | |
| Customer | PTAX | PTDSCL | C04 | \$ 551,968 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Customer Accounts Expense | | | | | | | | | | | |
| Customer | PTAX | PTCAE | C05 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Customer Service & Info. | | | | | | | | | | | |
| Customer | PTAX | PTCSI | C05 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Sales Expense | | | | | | | | | | | |
| Customer | PTAX | PTSEC | C06 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Total | | PTT | | \$ 35,914,758 | \$ 16,868,683 | \$ 4,199,818 | \$ 264,808 | \$ 3,213,443 | \$ 138,746 | \$ 2,976,138 | \$ 5,193,977 |

KENTUCKY UTILITIES COMPANY
Cost of Service Study
Class Allocation
12 Months Ended June 30, 2022

LOLP Methodology

| Description | Ref | Name | Allocation Vector | Retail Transmission | Fluctuating Load | Outdoor Lighting | Lighting Energy | Traffic Energy | Outdoor Sports | Electric Vehicle | Solar Share | Business Solar | | | | | | | | | |
|--|------|--------|----------------------|-------------------------------|-------------------------------|------------------|-----------------|----------------|-----------------|------------------|-------------|----------------|-------|----|-------|----|-------|----|-------|----|-----|
| | | | | Service RTS - Transmission | Service FLS - Transmission | LS & RLS | LE | TE | Lighting OSL | Charging EV | SSP | BS | | | | | | | | | |
| Property Taxes | | | | | | | | | | | | | | | | | | | | | |
| Power Production Plant | | | | | | | | | | | | | | | | | | | | | |
| Production Demand - LOLP | PTAX | PTPPDB | PPTLOLPDA | \$ | 1,322,185 | \$ | 547,515 | \$ | 3,569 | \$ | 130 | \$ | 2,123 | \$ | 273 | \$ | 18 | \$ | 4,039 | \$ | 569 |
| Production Energy | PTAX | PTPPEB | E01 | \$ | - | \$ | - | \$ | - | \$ | - | \$ | - | \$ | - | \$ | - | \$ | - | \$ | - |
| Total Power Production Plant | | | PTPPT | \$ | 1,322,185 | \$ | 547,515 | \$ | 3,569 | \$ | 130 | \$ | 2,123 | \$ | 273 | \$ | 18 | \$ | 4,039 | \$ | 569 |
| Transmission Plant | | | | | | | | | | | | | | | | | | | | | |
| Transmission Demand | PTAX | PTTRB | NCPT | \$ | 258,904 | \$ | 173,485 | \$ | 34,942 | \$ | 1,271 | \$ | 343 | \$ | 482 | \$ | 3 | \$ | - | \$ | - |
| Distribution Poles | | | | | | | | | | | | | | | | | | | | | |
| Specific | PTAX | PTDPS | NCPP | \$ | - | \$ | - | \$ | - | \$ | - | \$ | - | \$ | - | \$ | - | \$ | - | \$ | - |
| Distribution Substation | | | | | | | | | | | | | | | | | | | | | |
| General | PTAX | PTDSG | NCPP | \$ | - | \$ | - | \$ | 9,830 | \$ | 358 | \$ | 96 | \$ | 136 | \$ | 1 | \$ | - | \$ | - |
| Distribution Primary & Secondary Lines | | | | | | | | | | | | | | | | | | | | | |
| Primary Specific | PTAX | PTDPLS | NCPP | \$ | - | \$ | - | \$ | - | \$ | - | \$ | - | \$ | - | \$ | - | \$ | - | \$ | - |
| Primary Demand | PTAX | PTDPLD | NCPP | \$ | - | \$ | - | \$ | 7,818 | \$ | 284 | \$ | 77 | \$ | 108 | \$ | 1 | \$ | - | \$ | - |
| Primary Customer | PTAX | PTDPLC | Cust08 | \$ | - | \$ | - | \$ | 71,264 | \$ | 44 | \$ | 548 | \$ | 15 | \$ | 37 | \$ | - | \$ | - |
| Secondary Demand | PTAX | PTDSL | SICD | \$ | - | \$ | - | \$ | 2,717 | \$ | 99 | \$ | 27 | \$ | - | \$ | 0 | \$ | - | \$ | - |
| Secondary Customer | PTAX | PTDSL | Cust07 | \$ | - | \$ | - | \$ | 33,348 | \$ | 21 | \$ | 256 | \$ | 7 | \$ | 17 | \$ | - | \$ | - |
| Total Distribution Primary & Secondary Lines | | | PTDLT | \$ | - | \$ | - | \$ | 115,147 | \$ | 449 | \$ | 907 | \$ | 130 | \$ | 55 | \$ | - | \$ | - |
| Distribution Line Transformers | | | | | | | | | | | | | | | | | | | | | |
| Demand | PTAX | PTDLTD | SICDT | \$ | - | \$ | - | \$ | 3,269 | \$ | 119 | \$ | 32 | \$ | 77 | \$ | 0 | \$ | - | \$ | - |
| Customer | PTAX | PTDLTC | Cust09 | \$ | - | \$ | - | \$ | 20,007 | \$ | 12 | \$ | 154 | \$ | 4 | \$ | 10 | \$ | - | \$ | - |
| Total Line Transformers | | | PTDLTT | \$ | - | \$ | - | \$ | 23,275 | \$ | 131 | \$ | 186 | \$ | 81 | \$ | 11 | \$ | - | \$ | - |
| Distribution Services | | | | | | | | | | | | | | | | | | | | | |
| Customer | PTAX | PTDSC | C02 | \$ | - | \$ | - | \$ | - | \$ | - | \$ | - | \$ | 10 | \$ | - | \$ | - | \$ | - |
| Distribution Meters | | | | | | | | | | | | | | | | | | | | | |
| Customer | PTAX | PTDMC | MPTA | \$ | 3,727 | \$ | 230 | \$ | - | \$ | 42 | \$ | 517 | \$ | 20 | \$ | 1,987 | \$ | - | \$ | - |
| Distribution Street & Customer Lighting | | | | | | | | | | | | | | | | | | | | | |
| Customer | PTAX | PTDSCL | C04 | \$ | - | \$ | - | \$ | 551,968 | \$ | - | \$ | - | \$ | - | \$ | - | \$ | - | \$ | - |
| Customer Accounts Expense | | | | | | | | | | | | | | | | | | | | | |
| Customer | PTAX | PTCAE | C05 | \$ | - | \$ | - | \$ | - | \$ | - | \$ | - | \$ | - | \$ | - | \$ | - | \$ | - |
| Customer Service & Info. | | | | | | | | | | | | | | | | | | | | | |
| Customer | PTAX | PTCSI | C05 | \$ | - | \$ | - | \$ | - | \$ | - | \$ | - | \$ | - | \$ | - | \$ | - | \$ | - |
| Sales Expense | | | | | | | | | | | | | | | | | | | | | |
| Customer | PTAX | PTSEC | C06 | \$ | - | \$ | - | \$ | - | \$ | - | \$ | - | \$ | - | \$ | - | \$ | - | \$ | - |
| Total | | | PTT | \$ | 1,584,815 | \$ | 721,230 | \$ | 738,731 | \$ | 2,381 | \$ | 4,173 | \$ | 1,132 | \$ | 2,076 | \$ | 4,039 | \$ | 569 |

KENTUCKY UTILITIES COMPANY
Cost of Service Study
Class Allocation
12 Months Ended June 30, 2022

LOLP Methodology

| Description | Ref | Name | Allocation Vector | Total System | Residential Rate RS | General Service GS | All Electric Schools AES | Power Service PS-Secondary | Power Service PS-Primary | Time of Day TOD-Secondary | Time of Day TOD-Primary |
|--|------|---------|-------------------|---------------|---------------------|--------------------|--------------------------|----------------------------|--------------------------|---------------------------|-------------------------|
| Other Taxes | | | | | | | | | | | |
| Power Production Plant | | | | | | | | | | | |
| Production Demand - LOLP | OTAX | OTPPDB | LOLP | \$ 8,507,901 | \$ 3,491,572 | \$ 940,435 | \$ 60,345 | \$ 876,994 | \$ 38,101 | \$ 843,428 | \$ 1,543,988 |
| Production Energy | OTAX | OTPPEB | E01 | - | - | - | - | - | - | - | - |
| Total Power Production Plant | | OTPPPT | | \$ 8,507,901 | \$ 3,491,572 | \$ 940,435 | \$ 60,345 | \$ 876,994 | \$ 38,101 | \$ 843,428 | \$ 1,543,988 |
| Transmission Plant | | | | | | | | | | | |
| Transmission Demand | OTAX | OTTRB | NCPT | \$ 1,945,146 | \$ 860,040 | \$ 220,755 | \$ 22,593 | \$ 196,932 | \$ 8,462 | \$ 174,219 | \$ 283,740 |
| Distribution Poles | | | | | | | | | | | |
| Specific | OTAX | OTDPS | NCPP | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Distribution Substation | | | | | | | | | | | |
| General | OTAX | OTDSG | NCPP | \$ 500,992 | \$ 241,953 | \$ 62,104 | \$ 6,356 | \$ 55,402 | \$ 2,381 | \$ 49,013 | \$ 79,824 |
| Distribution Primary & Secondary Lines | | | | | | | | | | | |
| Primary Specific | OTAX | OTDPLS | NCPP | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Primary Demand | OTAX | OTDPLD | NCPP | \$ 398,466 | \$ 192,438 | \$ 49,395 | \$ 5,055 | \$ 44,064 | \$ 1,893 | \$ 38,982 | \$ 63,488 |
| Primary Customer | OTAX | OTDPLC | Cust08 | \$ 774,524 | \$ 622,187 | \$ 116,442 | \$ 596 | \$ 6,247 | \$ 287 | \$ 1,077 | \$ 360 |
| Secondary Demand | OTAX | OTDSL D | SICD | \$ 179,383 | \$ 148,578 | \$ 27,716 | \$ 2,009 | \$ - | \$ - | \$ - | \$ - |
| Secondary Customer | OTAX | OTDSL C | Cust07 | \$ 362,130 | \$ 291,148 | \$ 54,488 | \$ 279 | \$ 2,923 | \$ - | \$ 504 | \$ - |
| Total Distribution Primary & Secondary Lines | | OTDLT | | \$ 1,714,504 | \$ 1,254,351 | \$ 248,040 | \$ 7,940 | \$ 53,234 | \$ 2,180 | \$ 40,564 | \$ 63,848 |
| Distribution Line Transformers | | | | | | | | | | | |
| Demand | OTAX | OTDLTD | SICDT | \$ 261,493 | \$ 178,745 | \$ 33,343 | \$ 2,417 | \$ 24,635 | \$ - | \$ 21,024 | \$ - |
| Customer | OTAX | OTDLTC | Cust09 | \$ 217,256 | \$ 174,671 | \$ 32,689 | \$ 167 | \$ 1,754 | \$ - | \$ 302 | \$ - |
| Total Line Transformers | | OTDLTT | | \$ 478,749 | \$ 353,416 | \$ 66,032 | \$ 2,584 | \$ 26,388 | \$ - | \$ 21,327 | \$ - |
| Distribution Services | | | | | | | | | | | |
| Customer | OTAX | OTDSC | C02 | \$ 183,174 | \$ 144,866 | \$ 32,567 | \$ 295 | \$ 4,232 | \$ - | \$ 1,211 | \$ - |
| Distribution Meters | | | | | | | | | | | |
| Customer | OTAX | OTDMC | C03 | \$ 108,941 | \$ 65,815 | \$ 26,558 | \$ 542 | \$ 8,304 | \$ 1,624 | \$ 1,485 | \$ 2,877 |
| Distribution Street & Customer Lighting | | | | | | | | | | | |
| Customer | OTAX | OTDSCL | C04 | \$ 209,772 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Customer Accounts Expense | | | | | | | | | | | |
| Customer | OTAX | OTCAE | C05 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Customer Service & Info. | | | | | | | | | | | |
| Customer | OTAX | OTCSI | C05 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Sales Expense | | | | | | | | | | | |
| Customer | OTAX | OTSEC | C06 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Total | | OTT | | \$ 13,649,179 | \$ 6,412,012 | \$ 1,596,492 | \$ 100,655 | \$ 1,221,487 | \$ 52,749 | \$ 1,131,247 | \$ 1,974,276 |

KENTUCKY UTILITIES COMPANY
Cost of Service Study
Class Allocation
12 Months Ended June 30, 2022

LOLP Methodology

| Description | Ref | Name | Allocation Vector | Retail Transmission Service | | Fluctuating Load Service | | Outdoor Lighting | Lighting Energy | Traffic Energy | Outdoor Sports Lighting | Electric Vehicle Charging | Solar Share | Business Solar | | | | | | | |
|--|------|---------|-------------------|-----------------------------|--------------------|--------------------------|---------|------------------|-----------------|----------------|-------------------------|---------------------------|-------------|----------------|-----|----|----|----|---|----|---|
| | | | | RTS - Transmission | FLS - Transmission | LS & RLS | LE | TE | OSL | EV | SSP | BS | | | | | | | | | |
| Other Taxes | | | | | | | | | | | | | | | | | | | | | |
| Power Production Plant | | | | | | | | | | | | | | | | | | | | | |
| Production Demand - LOLP | OTAX | OTPPDB | LOLP | \$ | 502,591 | \$ | 208,122 | \$ | 1,357 | \$ | 49 | \$ | 807 | \$ | 104 | \$ | 7 | \$ | - | \$ | - |
| Production Energy | OTAX | OTPPEB | E01 | \$ | - | \$ | - | \$ | - | \$ | - | \$ | - | \$ | - | \$ | - | \$ | - | \$ | - |
| Total Power Production Plant | | OTPPPT | | \$ | 502,591 | \$ | 208,122 | \$ | 1,357 | \$ | 49 | \$ | 807 | \$ | 104 | \$ | 7 | \$ | - | \$ | - |
| Transmission Plant | | | | | | | | | | | | | | | | | | | | | |
| Transmission Demand | OTAX | OTTRB | NCPT | \$ | 98,395 | \$ | 65,932 | \$ | 13,279 | \$ | 483 | \$ | 130 | \$ | 183 | \$ | 1 | \$ | - | \$ | - |
| Distribution Poles | | | | | | | | | | | | | | | | | | | | | |
| Specific | OTAX | OTDPS | NCPP | \$ | - | \$ | - | \$ | - | \$ | - | \$ | - | \$ | - | \$ | - | \$ | - | \$ | - |
| Distribution Substation | | | | | | | | | | | | | | | | | | | | | |
| General | OTAX | OTDSG | NCPP | \$ | - | \$ | - | \$ | 3,736 | \$ | 136 | \$ | 37 | \$ | 52 | \$ | 0 | \$ | - | \$ | - |
| Distribution Primary & Secondary Lines | | | | | | | | | | | | | | | | | | | | | |
| Primary Specific | OTAX | OTDPLS | NCPP | \$ | - | \$ | - | \$ | - | \$ | - | \$ | - | \$ | - | \$ | - | \$ | - | \$ | - |
| Primary Demand | OTAX | OTDPLD | NCPP | \$ | - | \$ | - | \$ | 2,971 | \$ | 108 | \$ | 29 | \$ | 41 | \$ | 0 | \$ | - | \$ | - |
| Primary Customer | OTAX | OTDPLC | Cust08 | \$ | - | \$ | - | \$ | 27,084 | \$ | 17 | \$ | 208 | \$ | 6 | \$ | 14 | \$ | - | \$ | - |
| Secondary Demand | OTAX | OTDSL D | SICD | \$ | - | \$ | - | \$ | 1,033 | \$ | 38 | \$ | 10 | \$ | - | \$ | 0 | \$ | - | \$ | - |
| Secondary Customer | OTAX | OTDSL C | Cust07 | \$ | - | \$ | - | \$ | 12,674 | \$ | 8 | \$ | 97 | \$ | 3 | \$ | 7 | \$ | - | \$ | - |
| Total Distribution Primary & Secondary Lines | | OTDLT | | \$ | - | \$ | - | \$ | 43,761 | \$ | 170 | \$ | 345 | \$ | 49 | \$ | 21 | \$ | - | \$ | - |
| Distribution Line Transformers | | | | | | | | | | | | | | | | | | | | | |
| Demand | OTAX | OTDLTD | SICDT | \$ | - | \$ | - | \$ | 1,242 | \$ | 45 | \$ | 12 | \$ | 29 | \$ | 0 | \$ | - | \$ | - |
| Customer | OTAX | OTDLTC | Cust09 | \$ | - | \$ | - | \$ | 7,603 | \$ | 5 | \$ | 58 | \$ | 2 | \$ | 4 | \$ | - | \$ | - |
| Total Line Transformers | | OTDLTT | | \$ | - | \$ | - | \$ | 8,846 | \$ | 50 | \$ | 71 | \$ | 31 | \$ | 4 | \$ | - | \$ | - |
| Distribution Services | | | | | | | | | | | | | | | | | | | | | |
| Customer | OTAX | OTDSC | C02 | \$ | - | \$ | - | \$ | - | \$ | - | \$ | 4 | \$ | - | \$ | - | \$ | - | \$ | - |
| Distribution Meters | | | | | | | | | | | | | | | | | | | | | |
| Customer | OTAX | OTDMC | C03 | \$ | 1,426 | \$ | 88 | \$ | - | \$ | 16 | \$ | 198 | \$ | 7 | \$ | - | \$ | - | \$ | - |
| Distribution Street & Customer Lighting | | | | | | | | | | | | | | | | | | | | | |
| Customer | OTAX | OTDSCL | C04 | \$ | - | \$ | - | \$ | 209,772 | \$ | - | \$ | - | \$ | - | \$ | - | \$ | - | \$ | - |
| Customer Accounts Expense | | | | | | | | | | | | | | | | | | | | | |
| Customer | OTAX | OTCAE | C05 | \$ | - | \$ | - | \$ | - | \$ | - | \$ | - | \$ | - | \$ | - | \$ | - | \$ | - |
| Customer Service & Info. | | | | | | | | | | | | | | | | | | | | | |
| Customer | OTAX | OTCSI | C05 | \$ | - | \$ | - | \$ | - | \$ | - | \$ | - | \$ | - | \$ | - | \$ | - | \$ | - |
| Sales Expense | | | | | | | | | | | | | | | | | | | | | |
| Customer | OTAX | OTSEC | C06 | \$ | - | \$ | - | \$ | - | \$ | - | \$ | - | \$ | - | \$ | - | \$ | - | \$ | - |
| Total | | OTT | | \$ | 602,412 | \$ | 274,142 | \$ | 280,751 | \$ | 905 | \$ | 1,587 | \$ | 430 | \$ | 34 | \$ | - | \$ | - |

KENTUCKY UTILITIES COMPANY
Cost of Service Study
Class Allocation
12 Months Ended June 30, 2022

LOLP Methodology

| Description | Ref | Name | Allocation Vector | Total System | Residential Rate RS | General Service GS | All Electric Schools AES | Power Service PS-Secondary | Power Service PS-Primary | Time of Day TOD-Secondary | Time of Day TOD-Primary |
|--|--------|----------|-------------------|----------------|---------------------|--------------------|--------------------------|----------------------------|--------------------------|---------------------------|-------------------------|
| Interest | | | | | | | | | | | |
| Power Production Plant | | | | | | | | | | | |
| Production Demand - LOLP | INTLTD | INTPPDB | LOLP | \$ 68,341,836 | \$ 28,046,922 | \$ 7,554,281 | \$ 484,738 | \$ 7,044,670 | \$ 306,057 | \$ 6,775,045 | \$ 12,402,470 |
| Production Energy | INTLTD | INTPPEB | E01 | - | - | - | - | - | - | - | - |
| Total Power Production Plant | | INTPPT | | \$ 68,341,836 | \$ 28,046,922 | \$ 7,554,281 | \$ 484,738 | \$ 7,044,670 | \$ 306,057 | \$ 6,775,045 | \$ 12,402,470 |
| Transmission Plant | | | | | | | | | | | |
| Transmission Demand | INTLTD | INTTRB | NCPT | \$ 15,624,866 | \$ 6,908,489 | \$ 1,773,267 | \$ 181,484 | \$ 1,581,909 | \$ 67,976 | \$ 1,399,459 | \$ 2,279,208 |
| Distribution Poles | | | | | | | | | | | |
| Specific | INTLTD | INTDPS | NCPP | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Distribution Substation | | | | | | | | | | | |
| General | INTLTD | INTDSG | NCPP | \$ 4,024,346 | \$ 1,943,545 | \$ 498,868 | \$ 51,056 | \$ 445,034 | \$ 19,123 | \$ 393,706 | \$ 641,203 |
| Distribution Primary & Secondary Lines | | | | | | | | | | | |
| Primary Specific | INTLTD | INTDPLS | NCPP | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Primary Demand | INTLTD | INTDPLD | NCPP | \$ 3,200,777 | \$ 1,545,805 | \$ 396,776 | \$ 40,608 | \$ 353,959 | \$ 15,210 | \$ 313,135 | \$ 509,983 |
| Primary Customer | INTLTD | INTDPLC | Cust08 | \$ 6,221,559 | \$ 4,997,870 | \$ 935,348 | \$ 4,791 | \$ 50,177 | \$ 2,305 | \$ 8,655 | \$ 2,892 |
| Secondary Demand | INTLTD | INTDSL D | SICD | \$ 1,440,941 | \$ 1,193,493 | \$ 222,633 | \$ 16,138 | \$ - | \$ - | \$ - | \$ - |
| Secondary Customer | INTLTD | INTDSL C | Cust07 | \$ 2,908,902 | \$ 2,338,717 | \$ 437,689 | \$ 2,242 | \$ 23,480 | \$ - | \$ 4,050 | \$ - |
| Total Distribution Primary & Secondary Lines | | INTDLT | | \$ 13,772,180 | \$ 10,075,884 | \$ 1,992,446 | \$ 63,778 | \$ 427,616 | \$ 17,515 | \$ 325,840 | \$ 512,875 |
| Distribution Line Transformers | | | | | | | | | | | |
| Demand | INTLTD | INTDLTD | SICDT | \$ 2,100,509 | \$ 1,435,817 | \$ 267,836 | \$ 19,414 | \$ 197,884 | \$ - | \$ 168,883 | \$ - |
| Customer | INTLTD | INTDLTC | Cust09 | \$ 1,745,160 | \$ 1,403,084 | \$ 262,586 | \$ 1,345 | \$ 14,087 | \$ - | \$ 2,430 | \$ - |
| Total Line Transformers | | INTDLTT | | \$ 3,845,669 | \$ 2,838,902 | \$ 530,422 | \$ 20,759 | \$ 211,970 | \$ - | \$ 171,313 | \$ - |
| Distribution Services | | | | | | | | | | | |
| Customer | INTLTD | INTDSC | C02 | \$ 1,471,391 | \$ 1,163,670 | \$ 261,601 | \$ 2,367 | \$ 33,996 | \$ - | \$ 9,726 | \$ - |
| Distribution Meters | | | | | | | | | | | |
| Customer | INTLTD | INTDMC | C03 | \$ 875,094 | \$ 528,675 | \$ 213,336 | \$ 4,355 | \$ 66,702 | \$ 13,044 | \$ 11,930 | \$ 23,108 |
| Distribution Street & Customer Lighting | | | | | | | | | | | |
| Customer | INTLTD | INTDSCL | C04 | \$ 1,685,047 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Customer Accounts Expense | | | | | | | | | | | |
| Customer | INTLTD | INTCAE | C05 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Customer Service & Info. | | | | | | | | | | | |
| Customer | INTLTD | INTCSI | C05 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Sales Expense | | | | | | | | | | | |
| Customer | INTLTD | INTSEC | C06 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Total | | INTT | | \$ 109,640,429 | \$ 51,506,086 | \$ 12,824,222 | \$ 808,536 | \$ 9,811,898 | \$ 423,716 | \$ 9,087,020 | \$ 15,858,864 |

KENTUCKY UTILITIES COMPANY
Cost of Service Study
Class Allocation
12 Months Ended June 30, 2022

LOLP Methodology

| Description | Ref | Name | Allocation Vector | Retail Transmission | Fluctuating Load | Outdoor Lighting | Lighting Energy | Traffic Energy | Outdoor Sports | Electric Vehicle | Solar Share | Business Solar |
|--|--------|---------|----------------------|-------------------------------|-------------------------------|------------------|-----------------|----------------|-----------------|------------------|-------------|----------------|
| | | | | Service RTS - Transmission | Service FLS - Transmission | LS & RLS | LE | TE | Lighting OSL | Charging EV | SSP | BS |
| Interest | | | | | | | | | | | | |
| Power Production Plant | | | | | | | | | | | | |
| Production Demand - LOLP | INTLTD | INTPPDB | LOLP | \$ 4,037,191 | \$ 1,671,795 | \$ 10,897 | \$ 396 | \$ 6,483 | \$ 834 | \$ 56 | \$ - | \$ - |
| Production Energy | INTLTD | INTPPEB | E01 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Total Power Production Plant | | INTPPT | | \$ 4,037,191 | \$ 1,671,795 | \$ 10,897 | \$ 396 | \$ 6,483 | \$ 834 | \$ 56 | \$ - | \$ - |
| Transmission Plant | | | | | | | | | | | | |
| Transmission Demand | INTLTD | INTTRB | NCPT | \$ 790,380 | \$ 529,615 | \$ 106,670 | \$ 3,881 | \$ 1,046 | \$ 1,472 | \$ 9 | \$ - | \$ - |
| Distribution Poles | | | | | | | | | | | | |
| Specific | INTLTD | INTDPS | NCPP | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Distribution Substation | | | | | | | | | | | | |
| General | INTLTD | INTDSG | NCPP | \$ - | \$ - | \$ 30,009 | \$ 1,092 | \$ 294 | \$ 414 | \$ 3 | \$ - | \$ - |
| Distribution Primary & Secondary Lines | | | | | | | | | | | | |
| Primary Specific | INTLTD | INTDPLS | NCPP | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Primary Demand | INTLTD | INTDPLD | NCPP | \$ - | \$ - | \$ 23,868 | \$ 868 | \$ 234 | \$ 329 | \$ 2 | \$ - | \$ - |
| Primary Customer | INTLTD | INTDPLC | Cust08 | \$ - | \$ - | \$ 217,556 | \$ 136 | \$ 1,672 | \$ 45 | \$ 113 | \$ - | \$ - |
| Secondary Demand | INTLTD | INTDSL | SICD | \$ - | \$ - | \$ 8,294 | \$ 302 | \$ 81 | \$ - | \$ 1 | \$ - | \$ - |
| Secondary Customer | INTLTD | INTDSL | Cust07 | \$ - | \$ - | \$ 101,804 | \$ 63 | \$ 782 | \$ 21 | \$ 53 | \$ - | \$ - |
| Total Distribution Primary & Secondary Lines | | INTDLT | | \$ - | \$ - | \$ 351,521 | \$ 1,369 | \$ 2,770 | \$ 396 | \$ 169 | \$ - | \$ - |
| Distribution Line Transformers | | | | | | | | | | | | |
| Demand | INTLTD | INTDLTD | SICDT | \$ - | \$ - | \$ 9,978 | \$ 363 | \$ 98 | \$ 235 | \$ 1 | \$ - | \$ - |
| Customer | INTLTD | INTDLTC | Cust09 | \$ - | \$ - | \$ 61,076 | \$ 38 | \$ 469 | \$ 13 | \$ 32 | \$ - | \$ - |
| Total Line Transformers | | INTDLTT | | \$ - | \$ - | \$ 71,054 | \$ 401 | \$ 567 | \$ 247 | \$ 33 | \$ - | \$ - |
| Distribution Services | | | | | | | | | | | | |
| Customer | INTLTD | INTDSC | C02 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ 31 | \$ - | \$ - | \$ - |
| Distribution Meters | | | | | | | | | | | | |
| Customer | INTLTD | INTDMC | C03 | \$ 11,457 | \$ 707 | \$ - | \$ 129 | \$ 1,591 | \$ 60 | \$ - | \$ - | \$ - |
| Distribution Street & Customer Lighting | | | | | | | | | | | | |
| Customer | INTLTD | INTDSCL | C04 | \$ - | \$ - | \$ 1,685,047 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Customer Accounts Expense | | | | | | | | | | | | |
| Customer | INTLTD | INTCAE | C05 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Customer Service & Info. | | | | | | | | | | | | |
| Customer | INTLTD | INTCSI | C05 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Sales Expense | | | | | | | | | | | | |
| Customer | INTLTD | INTSEC | C06 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Total | | INTT | | \$ 4,839,028 | \$ 2,202,118 | \$ 2,255,198 | \$ 7,269 | \$ 12,751 | \$ 3,455 | \$ 269 | \$ - | \$ - |

KENTUCKY UTILITIES COMPANY
Cost of Service Study
Class Allocation
12 Months Ended June 30, 2022

LOLP Methodology

| Description | Ref | Name | Allocation Vector | Total System | Residential Rate RS | General Service GS | All Electric Schools AES | Power Service PS-Secondary | Power Service PS-Primary | Time of Day TOD-Secondary | Time of Day TOD-Primary |
|--|-----|--------|-------------------|------------------|---------------------|--------------------|--------------------------|----------------------------|--------------------------|---------------------------|-------------------------|
| Cost of Service Summary -- Unadjusted | | | | | | | | | | | |
| Operating Revenues | | | | | | | | | | | |
| Sales | | REVUC | R01 | \$ 1,558,608,458 | \$ 611,492,797 | \$ 224,799,513 | \$ 11,901,436 | \$ 169,760,857 | \$ 9,429,915 | \$ 134,172,118 | \$ 250,417,886 |
| Sales for Resale | | | Energy | 8,863,601 | 3,060,544 | 864,129 | 66,194 | 874,964 | 39,542 | 918,738 | 1,985,075 |
| Curtailed Service Rider | | | | (18,634,070) | | | | | | | (1,032,456) |
| LATE PAYMENT CHARGES | | | LPAY | 3,870,654 | 3,005,113 | 603,038 | 17,979 | 188,380 | 8,644 | 32,507 | 10,840 |
| RECONNECT CHARGES | | | RECON | 2,104,204 | 2,004,119 | 96,024 | 268 | 2,811 | 129 | 485 | 162 |
| OTHER SERVICE CHARGES | | | MISCSERV | 93,979 | 9,792 | 18,331 | 4,534 | 47,511 | 2,180 | 8,198 | 2,734 |
| RENT FROM ELEC PROPERTY | | | RFEP | 2,942,175 | 1,391,702 | 345,603 | 21,944 | 259,914 | 11,265 | 240,634 | 419,405 |
| TRANSMISSION SERVICE | | | PLTRT | 26,560,959 | 11,743,851 | 3,014,405 | 308,507 | 2,689,112 | 115,553 | 2,378,963 | 3,874,462 |
| ANCILLARY SERVICES | | | LOLP | 1,421,404 | 583,332 | 157,117 | 10,082 | 146,518 | 6,366 | 140,910 | 257,952 |
| TAX REMITTANCE COMPENSATION | | | MISCSERV | 600 | 63 | 117 | 29 | 303 | 14 | 52 | 17 |
| SOLAR REC | | | ENERGY | 90,486 | 31,244 | 8,822 | 676 | 8,932 | 404 | 9,379 | 20,265 |
| RETURN CHECK CHARGES | | | RETURN | 61,024 | 56,873 | 3,526 | 42 | 442 | 20 | 76 | 25 |
| OTHER MISC REVENUES | | | MISCSERV | 166,699 | 17,368 | 32,515 | 8,043 | 84,274 | 3,867 | 14,542 | 4,850 |
| EXCESS FACILITIES CHARGES | | | MISCSERV | 30,874 | 3,217 | 6,022 | 1,490 | 15,608 | 716 | 2,693 | 898 |
| REFINED COAL LICENSE FEES | | | LOLP | - | - | - | - | - | - | - | - |
| EV CHARGING STATION RENTAL | | | | 5,191 | | | | | | | |
| Total Operating Revenues | | TOR | | \$ 1,586,186,238 | \$ 633,400,015 | \$ 229,949,160 | \$ 12,341,223 | \$ 174,079,627 | \$ 9,618,615 | \$ 137,919,298 | \$ 255,962,116 |
| Operating Expenses | | | | | | | | | | | |
| Operation and Maintenance Expenses | | | | \$ 892,295,073 | \$ 369,164,547 | \$ 102,781,777 | \$ 6,577,503 | \$ 80,222,463 | \$ 3,699,084 | \$ 80,149,961 | \$ 161,373,638 |
| Depreciation and Amortization Expenses | | | | 370,531,145 | 164,107,492 | 42,247,417 | 2,713,113 | 35,446,328 | 1,534,789 | 33,401,356 | 59,608,942 |
| Regulatory Credits and Accretion Expenses | | | | - | - | - | - | - | - | - | - |
| Property Taxes | | | NPT | 35,914,758 | 16,868,683 | 4,199,818 | 264,808 | 3,213,443 | 138,746 | 2,976,138 | 5,193,977 |
| Other Taxes | | | | 13,649,179 | 6,412,012 | 1,596,492 | 100,655 | 1,221,487 | 52,749 | 1,131,247 | 1,974,276 |
| Gain Disposition of Allowances | | | | - | - | - | - | - | - | - | - |
| State and Federal Income Taxes | | | TAXINC | 23,821,553 | 3,677,404 | 9,621,085 | 272,325 | 6,408,888 | 547,018 | 1,621,461 | 1,734,483 |
| Total Operating Expenses | | TOE | | \$ 1,336,211,708 | \$ 560,230,138 | \$ 160,446,589 | \$ 9,928,404 | \$ 126,512,609 | \$ 5,972,385 | \$ 119,280,162 | \$ 229,885,316 |
| Net Operating Income (Unadjusted) | | TOM | | \$ 249,974,531 | \$ 73,169,877 | \$ 69,502,571 | \$ 2,412,819 | \$ 47,567,018 | \$ 3,646,230 | \$ 18,639,136 | \$ 26,076,800 |
| Net Cost Rate Base | | | | \$ 5,197,832,023 | \$ 2,457,262,896 | \$ 610,215,074 | \$ 38,745,077 | \$ 458,917,674 | \$ 19,889,476 | \$ 424,876,670 | \$ 740,522,922 |
| Taxable Income Unadjusted | | | | | | | | | | | |
| Total Operating Revenue | | | | \$ 1,586,186,238 | \$ 633,400,015 | \$ 229,949,160 | \$ 12,341,223 | \$ 174,079,627 | \$ 9,618,615 | \$ 137,919,298 | \$ 255,962,116 |
| Operating Expenses | | | | \$ 1,312,390,155 | \$ 556,552,735 | \$ 150,825,504 | \$ 9,656,079 | \$ 120,103,721 | \$ 5,425,367 | \$ 117,658,701 | \$ 228,150,833 |
| Interest Expense | | INTEXP | | \$ 109,640,429 | \$ 51,506,086 | \$ 12,824,222 | \$ 808,536 | \$ 9,811,898 | \$ 423,716 | \$ 9,087,020 | \$ 15,858,864 |
| Taxable Income | | TAXINC | | \$ 164,155,654 | \$ 25,341,194 | \$ 66,299,434 | \$ 1,876,608 | \$ 44,164,008 | \$ 3,769,533 | \$ 11,173,577 | \$ 11,952,419 |

KENTUCKY UTILITIES COMPANY
Cost of Service Study
Class Allocation
12 Months Ended June 30, 2022

LOLP Methodology

| Description | Ref | Name | Allocation Vector | Retail Transmission Service | Fluctuating Load Service | Outdoor Lighting | Lighting Energy | Traffic Energy | Outdoor Sports Lighting | Electric Vehicle Charging | Solar Share | Business Solar |
|--|-----|--------|-------------------|-----------------------------|--------------------------|------------------|-----------------|----------------|-------------------------|---------------------------|--------------|----------------|
| | | | | RTS - Transmission | FLS - Transmission | LS & RLS | LE | TE | OSL | EV | SSP | BS |
| Cost of Service Summary -- Unadjusted | | | | | | | | | | | | |
| Operating Revenues | | | | | | | | | | | | |
| Sales | | REVUC | R01 | \$ 82,247,981 | \$ 32,956,814 | \$ 30,555,893 | \$ 307,246 | \$ 271,291 | \$ 92,320 | \$ 1,533 | \$ 162,504 | \$ 38,355 |
| Sales for Resale | | | Energy | 690,878 | 298,012 | 61,868 | 2,251 | 1,232 | 168 | 6 | - | - |
| Curtailed Service Rider | | | | (3,386,120) | (14,215,494) | | | | | | | |
| LATE PAYMENT CHARGES | | | LPAY | 848 | 42 | 3,262 | - | - | - | - | - | - |
| RECONNECT CHARGES | | | RECON | 13 | 1 | 193 | - | - | - | - | - | - |
| OTHER SERVICE CHARGES | | | MISCSERV | 214 | 11 | 474 | - | - | - | - | - | - |
| RENT FROM ELEC PROPERTY | | | RFEP | 127,744 | 59,097 | 64,194 | 226 | 349 | 99 | - | - | - |
| TRANSMISSION SERVICE | | | PLTRT | 1,343,580 | 900,302 | 181,331 | 6,597 | 1,777 | 2,503 | 16 | - | - |
| ANCILLARY SERVICES | | | LOLP | 83,967 | 34,771 | 227 | 8 | 135 | 17 | 1 | - | - |
| TAX REMITTANCE COMPENSATION | | | MISCSERV | 1 | 0 | 3 | - | - | - | - | - | - |
| SOLAR REC | | | ENERGY | 7,053 | 3,042 | 632 | 23 | 13 | 2 | 0 | - | - |
| RETURN CHECK CHARGES | | | RETURN | 2 | 0 | 18 | - | - | - | - | - | - |
| OTHER MISC REVENUES | | | MISCSERV | 380 | 19 | 841 | - | - | - | - | - | - |
| EXCESS FACILITIES CHARGES | | | MISCSERV | 70 | 4 | 156 | - | - | - | - | - | - |
| REFINED COAL LICENSE FEES | | | LOLP | - | - | - | - | - | - | - | - | - |
| EV CHARGING STATION RENTAL | | | | | | | | | | 5,191 | | |
| Total Operating Revenues | | TOR | | \$ 81,116,612 | \$ 20,036,620 | \$ 30,869,092 | \$ 316,351 | \$ 274,796 | \$ 95,109 | \$ 6,746 | \$ 162,504 | \$ 38,355 |
| Operating Expenses | | | | | | | | | | | | |
| Operation and Maintenance Expenses | | | | \$ 54,272,685 | \$ 23,902,778 | \$ 9,699,480 | \$ 167,482 | \$ 140,707 | \$ 22,991 | \$ 21,464 | \$ 91,514 | \$ 7,000 |
| Depreciation and Amortization Expenses | | | | 18,833,077 | 8,245,658 | 4,191,495 | 15,849 | 39,221 | 8,924 | 16,555 | 106,487 | 14,444 |
| Regulatory Credits and Accretion Expenses | | | | - | - | - | - | - | - | - | - | - |
| Property Taxes | | | NPT | 1,584,815 | 721,230 | 738,731 | 2,381 | 4,173 | 1,132 | 2,076 | 4,039 | 569 |
| Other Taxes | | | | 602,412 | 274,142 | 280,751 | 905 | 1,587 | 430 | 34 | - | - |
| Gain Disposition of Allowances | | | | - | - | - | - | - | - | - | - | - |
| State and Federal Income Taxes | | | TAXINC | \$ 142,880 | \$ (2,221,620) | \$ 1,988,583 | \$ 17,772 | \$ 11,081 | \$ 8,443 | \$ (4,883) | \$ (5,737) | \$ 2,371 |
| Total Operating Expenses | | TOE | | \$ 75,435,869 | \$ 30,922,189 | \$ 16,899,039 | \$ 204,388 | \$ 196,768 | \$ 41,919 | \$ 35,245 | \$ 196,303 | \$ 24,385 |
| Net Operating Income (Unadjusted) | | TOM | | \$ 5,680,743 | \$ (10,885,569) | \$ 13,970,052 | \$ 111,963 | \$ 78,028 | \$ 53,190 | \$ (28,498) | \$ (33,799) | \$ 13,970 |
| Net Cost Rate Base | | | | \$ 225,552,349 | \$ 104,343,933 | \$ 113,343,713 | \$ 398,777 | \$ 615,338 | \$ 174,679 | \$ 105,539 | \$ 2,576,969 | \$ 290,934 |
| Taxable Income Unadjusted | | | | | | | | | | | | |
| Total Operating Revenue | | | | \$ 81,116,612 | \$ 20,036,620 | \$ 30,869,092 | \$ 316,351 | \$ 274,796 | \$ 95,109 | \$ 6,746 | \$ 162,504 | \$ 38,355 |
| Operating Expenses | | | | \$ 75,292,989 | \$ 33,143,809 | \$ 14,910,456 | \$ 186,617 | \$ 185,688 | \$ 33,476 | \$ 40,128 | \$ 202,040 | \$ 22,013 |
| Interest Expense | | INTEXP | | \$ 4,839,028 | \$ 2,202,118 | \$ 2,255,198 | \$ 7,269 | \$ 12,751 | \$ 3,455 | \$ 269 | \$ - | \$ - |
| Taxable Income | | TAXINC | | \$ 984,595 | \$ (15,309,306) | \$ 13,703,437 | \$ 122,466 | \$ 76,358 | \$ 58,178 | \$ (33,651) | \$ (39,536) | \$ 16,342 |

KENTUCKY UTILITIES COMPANY
Cost of Service Study
Class Allocation
12 Months Ended June 30, 2022

LOLP Methodology

| Description | Ref | Name | Allocation Vector | Total System | Residential Rate RS | General Service GS | All Electric Schools AES | Power Service PS-Secondary | Power Service PS-Primary | Time of Day TOD-Secondary | Time of Day TOD-Primary |
|---|-----|------|-------------------|------------------|---------------------|--------------------|--------------------------|----------------------------|--------------------------|---------------------------|-------------------------|
| Cost of Service Summary -- Pro-Forma | | | | | | | | | | | |
| Operating Revenues | | | | | | | | | | | |
| Total Pro-Forma Operating Revenue | | | | \$ 1,586,186,238 | \$ 633,400,015 | \$ 229,949,160 | \$ 12,341,223 | \$ 174,079,627 | \$ 9,618,615 | \$ 137,919,298 | \$ 255,962,116 |
| Operating Expenses | | | | | | | | | | | |
| Operation and Maintenance Expenses | | | | \$ 892,295,073 | \$ 369,164,547 | \$ 102,781,777 | \$ 6,577,503 | \$ 80,222,463 | \$ 3,699,084 | \$ 80,149,961 | \$ 161,373,638 |
| Depreciation and Amortization Expenses | | | | 370,531,145 | 164,107,492 | 42,247,417 | 2,713,113 | 35,446,328 | 1,534,789 | 33,401,356 | 59,608,942 |
| Regulatory Credits and Accretion Expenses | | | | - | - | - | - | - | - | - | - |
| Property Taxes | | | NPT | 35,914,758 | 16,868,683 | 4,199,818 | 264,808 | 3,213,443 | 138,746 | 2,976,138 | 5,193,977 |
| Other Taxes | | | | 13,649,179 | 6,412,012 | 1,596,492 | 100,655 | 1,221,487 | 52,749 | 1,131,247 | 1,974,276 |
| Gain Disposition of Allowances | | | | - | - | - | - | - | - | - | - |
| State and Federal Income Taxes | | | TAXINC | 23,821,553 | 3,677,404 | 9,621,085 | 272,325 | 6,408,888 | 547,018 | 1,621,461 | 1,734,483 |
| Specific Assignment of Curtailable Service Rider Credit | | | | (18,634,070) | - | - | - | - | - | - | (1,032,456) |
| Total Operating Expenses | | | TOE | \$ 1,336,211,708 | \$ 567,877,412 | \$ 162,506,339 | \$ 10,060,573 | \$ 128,433,409 | \$ 6,055,835 | \$ 121,127,446 | \$ 232,234,517 |
| Net Operating Income (Adjusted) | | | | \$ 249,974,531 | \$ 65,522,603 | \$ 67,442,821 | \$ 2,280,650 | \$ 45,646,218 | \$ 3,562,781 | \$ 16,791,852 | \$ 23,727,598 |
| Adjusted Net Cost Rate Base | | | | \$ 5,197,832,023 | \$ 2,457,262,896 | \$ 610,215,074 | \$ 38,745,077 | \$ 458,917,674 | \$ 19,889,476 | \$ 424,876,670 | \$ 740,522,922 |
| Rate of Return | | | | 4.81% | 2.67% | 11.05% | 5.89% | 9.95% | 17.91% | 3.95% | 3.20% |
| Taxable Income Pro-Forma | | | | | | | | | | | |
| Total Operating Revenue | | | | \$ 1,586,186,238 | \$ 633,400,015 | \$ 229,949,160 | \$ 12,341,223 | \$ 174,079,627 | \$ 9,618,615 | \$ 137,919,298 | \$ 255,962,116 |
| Operating Expenses | | | | \$ 1,312,390,155 | \$ 564,200,009 | \$ 152,885,255 | \$ 9,788,247 | \$ 122,024,520 | \$ 5,508,817 | \$ 119,505,985 | \$ 230,500,035 |
| Interest Expense | | | INTEXP | \$ 109,640,429 | \$ 51,506,086 | \$ 12,824,222 | \$ 808,536 | \$ 9,811,898 | \$ 423,716 | \$ 9,087,020 | \$ 15,858,864 |
| Interest Synchronization Adjustment | | | INTEXP | \$ 6,243,936 | \$ 2,933,231 | \$ 730,329 | \$ 46,045 | \$ 558,780 | \$ 24,130 | \$ 517,499 | \$ 903,150 |
| Taxable Income | | | TXINCPF | \$ 157,911,719 | \$ 14,760,689 | \$ 63,509,354 | \$ 1,698,394 | \$ 41,684,429 | \$ 3,661,953 | \$ 8,808,794 | \$ 8,700,067 |

KENTUCKY UTILITIES COMPANY
Cost of Service Study
Class Allocation
12 Months Ended June 30, 2022

LOLP Methodology

| Description | Ref | Name | Allocation Vector | Retail Transmission Service | Fluctuating Load Service | Outdoor Lighting | Lighting Energy | Traffic Energy | Outdoor Sports Lighting | Electric Vehicle Charging | Solar Share | Business Solar |
|--|-----|---------|-------------------|-----------------------------|--------------------------|------------------|-----------------|----------------|-------------------------|---------------------------|---------------|----------------|
| | | | | RTS - Transmission | FLS - Transmission | LS & RLS | LE | TE | OSL | EV | SSP | BS |
| Cost of Service Summary -- Pro-Forma | | | | | | | | | | | | |
| Operating Revenues | | | | | | | | | | | | |
| Total Pro-Forma Operating Revenue | | | | \$ 81,116,612 | \$ 20,036,620 | \$ 30,869,092 | \$ 316,351 | \$ 274,796 | \$ 95,109 | \$ 6,746 | \$ 162,504 | \$ 38,355 |
| Operating Expenses | | | | | | | | | | | | |
| Operation and Maintenance Expenses | | | | \$ 54,272,685 | \$ 23,902,778 | \$ 9,699,480 | \$ 167,482 | \$ 140,707 | \$ 22,991 | \$ 21,464 | \$ 91,514 | \$ 7,000 |
| Depreciation and Amortization Expenses | | | | 18,833,077 | 8,245,658 | 4,191,495 | 15,849 | 39,221 | 8,924 | 16,555 | 106,487 | 14,444 |
| Regulatory Credits and Accretion Expenses | | | | - | - | - | - | - | - | - | - | - |
| Property Taxes | | NPT | | 1,584,815 | 721,230 | 738,731 | 2,381 | 4,173 | 1,132 | 2,076 | 4,039 | 569 |
| Other Taxes | | | | 602,412 | 274,142 | 280,751 | 905 | 1,587 | 430 | 34 | - | - |
| Gain Disposition of Allowances | | | | - | - | - | - | - | - | - | - | - |
| State and Federal Income Taxes | | TAXINC | | \$ 142,880 | \$ (2,221,620) | \$ 1,988,583 | \$ 17,772 | \$ 11,081 | \$ 8,443 | \$ (4,883) | \$ (5,737) | \$ 2,371 |
| Specific Assignment of Curtable Service Rider Credit | | | | (3,386,120) | (14,215,494) | - | - | - | - | - | - | - |
| Total Operating Expenses | | TOE | | \$ 73,150,529 | \$ 17,162,527 | \$ 16,902,010 | \$ 204,496 | \$ 198,536 | \$ 42,146 | \$ 35,245 | \$ 196,303 | \$ 24,385 |
| Net Operating Income (Adjusted) | | | | \$ 7,966,082 | \$ 2,874,093 | \$ 13,967,081 | \$ 111,854 | \$ 76,260 | \$ 52,963 | \$ (28,498) | \$ (33,799) | \$ 13,970 |
| Adjusted Net Cost Rate Base | | | | \$ 225,552,349 | \$ 104,343,933 | \$ 113,343,713 | \$ 398,777 | \$ 615,338 | \$ 174,679 | \$ 105,539 | \$ 2,576,969 | \$ 290,934 |
| Rate of Return | | | | 3.53% | 2.75% | 12.32% | 28.05% | 12.39% | 30.32% | -27.00% | -1.31% | 4.80% |
| Taxable Income Pro-Forma | | | | | | | | | | | | |
| Total Operating Revenue | | | | \$ 81,116,612 | \$ 20,036,620 | \$ 30,869,092 | \$ 316,351 | \$ 274,796 | \$ 95,109 | \$ 6,746 | \$ 162,504 | \$ 38,355 |
| Operating Expenses | | | | \$ 73,007,649 | \$ 19,384,147 | \$ 14,913,427 | \$ 186,725 | \$ 187,455 | \$ 33,704 | \$ 40,128 | \$ 202,040 | \$ 22,013 |
| Interest Expense | | INTEXP | | \$ 4,839,028 | \$ 2,202,118 | \$ 2,255,198 | \$ 7,269 | \$ 12,751 | \$ 3,455 | \$ 269 | \$ - | \$ - |
| Interest Synchronization Adjustment | | | INTEXP | \$ 275,579 | \$ 125,409 | \$ 128,432 | \$ 414 | \$ 726 | \$ 197 | \$ 15 | \$ - | \$ - |
| Taxable Income | | TXINCPF | | \$ 2,994,356 | \$ (1,675,053) | \$ 13,572,034 | \$ 121,944 | \$ 73,864 | \$ 57,754 | \$ (33,666) | \$ (39,536) | \$ 16,342 |

KENTUCKY UTILITIES COMPANY
Cost of Service Study
Class Allocation
12 Months Ended June 30, 2022

LOLP Methodology

| Description | Ref | Name | Allocation Vector | Total System | Residential Rate RS | General Service GS | All Electric Schools AES | Power Service PS-Secondary | Power Service PS-Primary | Time of Day TOD-Secondary | Time of Day TOD-Primary |
|---|-----|------|----------------------|------------------|------------------------|-----------------------|-----------------------------|-------------------------------|-----------------------------|------------------------------|----------------------------|
| Cost of Service Summary – Adjusted for Proposed Increase | | | | | | | | | | | |
| Operating Revenue | | | | | | | | | | | |
| Total Operating Revenue | | | | \$ 1,586,186,238 | \$ 633,400,015 | \$ 229,949,160 | \$ 12,341,223 | \$ 174,079,627 | \$ 9,618,615 | \$ 137,919,298 | \$ 255,962,116 |
| Proposed Increase | | | | \$ 169,747,179 | \$ 68,196,266 | \$ 26,734,943 | \$ 1,453,830 | \$ 18,553,034 | \$ 1,039,687 | \$ 14,530,948 | \$ 26,942,083 |
| Revenue Adjustment for Solar Share and EV | | | | \$ 353,856 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Changes to EVSE-R | | | | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Changes in Other Service Revenues | | | MISC SERV | \$ 366,528 | \$ 38,188 | \$ 71,491 | \$ 17,684 | \$ 185,297 | \$ 8,503 | \$ 31,975 | \$ 10,663 |
| Changes in Miscellaneous Charges | | | MISC SERV | \$ 5,899 | \$ 615 | \$ 1,151 | \$ 285 | \$ 2,982 | \$ 137 | \$ 515 | \$ 172 |
| Total Pro-Forma Operating Revenue | | | | \$ 1,756,659,700 | \$ 701,635,083 | \$ 256,756,745 | \$ 13,813,022 | \$ 192,820,941 | \$ 10,666,942 | \$ 152,482,735 | \$ 282,915,033 |
| Operating Expenses | | | | | | | | | | | |
| Total Operating Expenses | | | | \$ 1,336,211,708 | \$ 567,877,412 | \$ 162,506,339 | \$ 10,060,573 | \$ 128,433,409 | \$ 6,055,835 | \$ 121,127,446 | \$ 232,234,517 |
| Pro-Forma Adjustments | | | | | | | | | | | |
| Increase in Uncollectible Expense | | | 0.316% | \$ 538,696 | \$ 215,623 | \$ 84,712 | \$ 4,651 | \$ 59,223 | \$ 3,313 | \$ 46,020 | \$ 85,171 |
| Increase in PSC Fees | | | 0.200% | \$ 340,947 | \$ 136,470 | \$ 53,615 | \$ 2,944 | \$ 37,483 | \$ 2,097 | \$ 29,127 | \$ 53,906 |
| Incremental Income Taxes | | | 24.83% | \$ 42,323,441 | \$ 16,940,718 | \$ 6,655,518 | \$ 365,403 | \$ 4,652,905 | \$ 260,268 | \$ 3,615,664 | \$ 6,691,600 |
| Total Pro-Forma Operating Expenses | | | | \$ 1,379,414,792 | \$ 585,170,224 | \$ 169,300,185 | \$ 10,433,571 | \$ 133,183,019 | \$ 6,321,512 | \$ 124,818,257 | \$ 239,065,194 |
| Net Operating Income | | | | \$ 377,244,908 | \$ 116,464,860 | \$ 87,456,560 | \$ 3,379,451 | \$ 59,637,921 | \$ 4,345,430 | \$ 27,664,478 | \$ 43,849,839 |
| Net Cost Rate Base | | | | \$ 5,197,832,023 | \$ 2,457,262,896 | \$ 610,215,074 | \$ 38,745,077 | \$ 458,917,674 | \$ 19,889,476 | \$ 424,876,670 | \$ 740,522,922 |
| Rate of Return | | | | 7.26% | 4.74% | 14.33% | 8.72% | 13.00% | 21.85% | 6.51% | 5.92% |

KENTUCKY UTILITIES COMPANY
Cost of Service Study
Class Allocation
12 Months Ended June 30, 2022

Exhibit WSS-31
Page 28 of 36

LOLP Methodology

| Description | Ref | Name | Allocation Vector | Retail Transmission Service | Fluctuating Load Service | Outdoor Lighting | Lighting Energy | Traffic Energy | Outdoor Sports Lighting | Electric Vehicle Charging | Solar Share | Business Solar |
|---|-----|------|-------------------|-----------------------------|--------------------------|------------------|-----------------|----------------|-------------------------|---------------------------|--------------|----------------|
| | | | | RTS - Transmission | FLS - Transmission | LS & RLS | LE | TE | OSL | EV | SSP | BS |
| Cost of Service Summary – Adjusted for Proposed Increase | | | | | | | | | | | | |
| Operating Revenue | | | | | | | | | | | | |
| Total Operating Revenue | | | | \$ 81,116,612 | \$ 20,036,620 | \$ 30,869,092 | \$ 316,351 | \$ 274,796 | \$ 95,109 | \$ 6,746 | \$ 162,504 | \$ 38,355 |
| Proposed Increase | | | | \$ 8,787,141 | \$ 3,514,118 | \$ (129) | \$ 18 | \$ 2 | \$ (4,762) | \$ - | \$ - | \$ - |
| Revenue Adjustment for Solar Share and EV | | | | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ 48,431 | \$ 295,846 | \$ 9,579 |
| Changes to EVSE-R | | | | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Changes in Other Service Revenues | | | MISC SERV | \$ 835 | \$ 42 | \$ 1,850 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Changes in Miscellaneous Charges | | | MISC SERV | \$ 13 | \$ 1 | \$ 30 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Total Pro-Forma Operating Revenue | | | | \$ 89,904,600 | \$ 23,550,780 | \$ 30,870,843 | \$ 316,369 | \$ 274,798 | \$ 90,347 | \$ 55,178 | \$ 458,350 | \$ 47,934 |
| Operating Expenses | | | | | | | | | | | | |
| Total Operating Expenses | | | | \$ 73,150,529 | \$ 17,162,527 | \$ 16,902,010 | \$ 204,496 | \$ 198,536 | \$ 42,146 | \$ 35,245 | \$ 196,303 | \$ 24,385 |
| Pro-Forma Adjustments | | | | | | | | | | | | |
| Increase in Uncollectible Expense | | | 0.316% | \$ 27,770 | \$ 11,105 | \$ 6 | \$ 0 | \$ 0 | \$ (15) | \$ 153 | \$ 935 | \$ 30 |
| Increase in PSC Fees | | | 0.200% | \$ 17,576 | \$ 7,028 | \$ 4 | \$ 0 | \$ 0 | \$ (10) | \$ 97 | \$ 592 | \$ 19 |
| Incremental Income Taxes | | | 24.83% | \$ 2,181,794 | \$ 872,460 | \$ 435 | \$ 4 | \$ 0 | \$ (1,182) | \$ 12,024 | \$ 73,450 | \$ 2,378 |
| Total Pro-Forma Operating Expenses | | | | \$ 75,377,669 | \$ 18,053,120 | \$ 16,902,454 | \$ 204,501 | \$ 198,536 | \$ 40,939 | \$ 47,519 | \$ 271,279 | \$ 26,812 |
| Net Operating Income | | | | \$ 14,526,931 | \$ 5,497,660 | \$ 13,968,388 | \$ 111,868 | \$ 76,262 | \$ 49,408 | \$ 7,659 | \$ 187,071 | \$ 21,121 |
| Net Cost Rate Base | | | | \$ 225,552,349 | \$ 104,343,933 | \$ 113,343,713 | \$ 398,777 | \$ 615,338 | \$ 174,679 | \$ 105,539 | \$ 2,576,969 | \$ 290,934 |
| Rate of Return | | | | 6.44% | 5.27% | 12.32% | 28.05% | 12.39% | 28.28% | 7.26% | 7.26% | 7.26% |

KENTUCKY UTILITIES COMPANY
Cost of Service Study
Class Allocation
12 Months Ended June 30, 2022

LOLP Methodology

| Description | Ref | Name | Allocation Vector | Total System | Residential Rate RS | General Service GS | All Electric Schools AES | Power Service PS-Secondary | Power Service PS-Primary | Time of Day TOD-Secondary | Time of Day TOD-Primary |
|--|-----|------|-------------------|----------------|---------------------|--------------------|--------------------------|----------------------------|--------------------------|---------------------------|-------------------------|
| Allocation Factors | | | | | | | | | | | |
| Energy Allocation Factors | | | | | | | | | | | |
| Energy Usage by Class | E01 | | Energy | 1.000000 | 0.345294 | 0.097492 | 0.007468 | 0.098714 | 0.004461 | 0.103653 | 0.223958 |
| Customer Allocation Factors | | | | | | | | | | | |
| Primary Distribution Plant -- Average Number of Custom | C08 | | Cust08 | 1.000000 | 0.80331 | 0.15034 | 0.00077 | 0.00807 | 0.00037 | 0.00139 | 0.00046 |
| Customer Services -- Weighted cost of Services | C02 | | | 1.000000 | 0.790864 | 0.177792 | 0.001609 | 0.023105 | - | 0.006610 | - |
| Meter Costs -- Weighted Cost of Meters | C03 | | | 1.000000 | 0.604135 | 0.243786 | 0.004976 | 0.076223 | 0.014906 | 0.013633 | 0.026406 |
| Lighting Systems -- Lighting Customers | C04 | | Cust04 | 1.000000 | - | - | - | - | - | - | - |
| Meter Reading and Billing -- Weighted Cost | C05 | | Cust05 | 1.000000 | 0.64961 | 0.24315 | 0.00623 | 0.03261 | 0.00150 | 0.02812 | 0.00940 |
| Marketing/Economic Development | C06 | | Cust06 | 1.000000 | 0.80328 | 0.15033 | 0.00077 | 0.00806 | 0.00037 | 0.00139 | 0.00046 |
| Total billed revenue per Billing Determinants | R01 | | | 1,558,608,458 | 611,492,797 | 224,799,513 | 11,901,436 | 169,760,857 | 9,429,915 | 134,172,118 | 250,417,886 |
| Energy (at the Meter) | | | | 17,402,124,383 | 5,943,619,831 | 1,678,149,896 | 128,548,999 | 1,699,193,305 | 78,721,459 | 1,784,202,424 | 3,951,918,371 |
| Energy (Loss Adjusted)(at Source) | | | Energy | 18,429,987,351 | 6,363,754,932 | 1,796,772,839 | 137,635,708 | 1,819,303,738 | 82,219,916 | 1,910,321,874 | 4,127,545,429 |
| O&M Customer Allocators | | | | | | | | | | | |
| Customers (Monthly Bills) | | | | 8,471,803 | 5,308,105 | 993,413 | 5,086 | 53,288 | 2,445 | 9,195 | 3,066 |
| Average Customers (Bills/12) | | | | 705,984 | 442,342 | 82,784 | 424 | 4,441 | 204 | 766 | 256 |
| Average Customers (Lighting = Lights) | | | | 705,984 | 442,342 | 82,784 | 424 | 4,441 | 204 | 766 | 256 |
| Weighted Average Customers (Lighting =9 Lights per Cu: Cust05 | | | | 680,930 | 442,342 | 165,568 | 4,240 | 22,205 | 1,020 | 19,150 | 6,400 |
| Street Lighting | | | Cust04 | 143,087,299 | - | - | - | - | - | - | - |
| Average Customers | | | Cust01 | 705,984 | 442,342 | 82,784 | 424 | 4,441 | 204 | 766 | 256 |
| Average Customers (Lighting = 9 Lights per Cust) | | | Cust06 | 550,667 | 442,342 | 82,784 | 424 | 4,441 | 204 | 766 | 256 |
| Average Secondary Customers | | | Cust07 | 550,186 | 442,342 | 82,784 | 424 | 4,441 | - | 766 | - |
| Average Primary Customers | | | Cust08 | 550,646 | 442,342 | 82,784 | 424 | 4,441 | 204 | 766 | 256 |
| Average Transformer Customers | | | Cust09 | 550,186 | 442,342 | 82,784 | 424 | 4,441 | - | 766 | - |
| Plant Customer Allocators | | | | | | | | | | | |
| Average Customers | | | | 705,871 | 442,270 | 82,743 | 424 | 4,442 | 204 | 765 | 256 |
| Average Customers (Lighting = Lights) | | | | 705,871 | 442,270 | 82,743 | 424 | 4,442 | 204 | 765 | 256 |
| Weighted Average Customers (Lighting =9 Lights per Cu: PCust05 | | | | 680,755 | 442,270 | 165,485 | 4,240 | 22,210 | 1,020 | 19,125 | 6,400 |
| Street Lighting | | | PCust04 | 143,087,299 | - | - | - | - | - | - | - |
| Average Customers | | | PCust01 | 705,871 | 442,270 | 82,743 | 424 | 4,442 | 204 | 765 | 256 |
| Average Customers (Lighting = 9 Lights per Cust) | | | PCust06 | 550,553 | 442,270 | 82,743 | 424 | 4,442 | 204 | 765 | 256 |
| Average Secondary Customers | | | PCust07 | 544,871 | 442,270 | 82,743 | 424 | - | - | - | - |
| Average Primary Customers | | | PCust08 | 550,532 | 442,270 | 82,743 | 424 | 4,442 | 204 | 765 | 256 |
| Average Transformer Customers | | | PCust09 | 550,072 | 442,270 | 82,743 | 424 | 4,442 | - | 765 | - |
| Demand Allocators | | | | | | | | | | | |
| Maximum Class Non-Coincident Peak Demands (Transm NCPT | | | | 4,393,697 | 1,942,660 | 498,641 | 51,033 | 444,831 | 19,115 | 393,527 | 640,911 |
| Maximum Class Non-Coincident Peak Demands (Primary NCPP | | | | 4,022,516 | 1,942,660 | 498,641 | 51,033 | 444,831 | 19,115 | 393,527 | 640,911 |
| Sum of the Individual Customer Demands (Transformer) SICDT | | | | 6,314,351 | 4,316,218 | 805,143 | 58,361 | 594,859 | - | 507,681 | - |
| Sum of the Individual Customer Demands (Secondary) SICD | | | | 5,211,105 | 4,316,218 | 805,143 | 58,361 | - | - | - | - |
| LOLP Demand Allocator | | | LOLP | 2,463,591 | 1,011,037 | 272,317 | 17,474 | 253,947 | 11,033 | 244,227 | 447,085 |

KENTUCKY UTILITIES COMPANY
Cost of Service Study
Class Allocation
12 Months Ended June 30, 2022

LOLP Methodology

| Description | Ref | Name | Allocation Vector | Retail Transmission Service | Fluctuating Load Service | Outdoor Lighting | Lighting Energy | Traffic Energy | Outdoor Sports Lighting | Electric Vehicle Charging | Solar Share | Business Solar |
|--|-----|---------|-------------------|-----------------------------|--------------------------|------------------|-----------------|----------------|-------------------------|---------------------------|-------------|----------------|
| | | | | RTS - Transmission | FLS - Transmission | LS & RLS | LE | TE | OSL | EV | SSP | BS |
| Allocation Factors | | | | | | | | | | | | |
| Energy Allocation Factors | | | | | | | | | | | | |
| Energy Usage by Class | E01 | Energy | | 0.077946 | 0.033622 | 0.006980 | 0.000254 | 0.000139 | 0.000019 | 0.000001 | - | - |
| Customer Allocation Factors | | | | | | | | | | | | |
| Primary Distribution Plant -- Average Number of Custom | C08 | Cust08 | | - | - | 0.03497 | 0.00002 | 0.00027 | 0.00001 | 0.00002 | - | - |
| Customer Services -- Weighted cost of Services | C02 | | | - | - | - | - | - | 0.000021 | - | - | - |
| Meter Costs -- Weighted Cost of Meters | C03 | | | 0.013092 | 0.000808 | - | 0.000148 | 0.001818 | 0.000069 | - | - | - |
| Lighting Systems -- Lighting Customers | C04 | Cust04 | | - | - | 1.00000 | - | - | - | - | - | - |
| Meter Reading and Billing -- Weighted Cost | C05 | Cust05 | | 0.00073 | 0.00007 | 0.02828 | 0.00002 | 0.00022 | 0.00003 | 0.00003 | - | - |
| Marketing/Economic Development | C06 | Cust06 | | 0.00004 | 0.00000 | 0.03497 | 0.00002 | 0.00027 | 0.00001 | 0.00002 | - | - |
| Total billed revenue per Billing Determinants | R01 | | | 82,247,981 | 32,956,814 | 30,555,893 | 307,246 | 271,291 | 92,320 | 1,533 | 162,504 | 38,355 |
| Energy (at the Meter) | | | | 1,404,629,847 | 605,890,405 | 120,148,466 | 4,371,371 | 2,392,654 | 326,405 | 10,950 | - | - |
| Energy (Loss Adjusted)(at Source) | | Energy | | 1,436,535,296 | 619,652,896 | 128,641,369 | 4,680,369 | 2,561,783 | 349,478 | 11,724 | - | - |
| O&M Customer Allocators | | | | | | | | | | | | |
| Customers (Monthly Bills) | | | | 240 | 12 | 2,079,516 | 1,296 | 15,972 | 48 | 120 | - | - |
| Average Customers (Bills/12) | | | | 20 | 1 | 173,293 | 108 | 1,331 | 4 | 10 | - | - |
| Average Customers (Lighting = Lights) | | | | 20 | 1 | 173,293 | 108 | 1,331 | 4 | 10 | - | - |
| Weighted Average Customers (Lighting =9 Lights per Cu: Cust05 | | | | 500 | 50 | 19,255 | 12 | 148 | 20 | 20 | - | - |
| Street Lighting | | Cust04 | | - | - | 143,087,299 | - | - | - | - | - | - |
| Average Customers | | Cust01 | | 20 | 1 | 173,293 | 108 | 1,331 | 4 | 10 | - | - |
| Average Customers (Lighting = 9 Lights per Cust) | | Cust06 | | 20 | 1 | 19,255 | 12 | 148 | 4 | 10 | - | - |
| Average Secondary Customers | | Cust07 | | - | - | 19,255 | 12 | 148 | 4 | 10 | - | - |
| Average Primary Customers | | Cust08 | | - | - | 19,255 | 12 | 148 | 4 | 10 | - | - |
| Average Transformer Customers | | Cust09 | | - | - | 19,255 | 12 | 148 | 4 | 10 | - | - |
| Plant Customer Allocators | | | | | | | | | | | | |
| Average Customers | | | | 20 | 1 | 173,293 | 108 | 1,331 | 4 | 10 | - | - |
| Average Customers (Lighting = Lights) | | | | 20 | 1 | 173,293 | 108 | 1,331 | 4 | 10 | - | - |
| Weighted Average Customers (Lighting =9 Lights per Cu: PCust05 | | | | 500 | 50 | 19,255 | 12 | 148 | 20 | 20 | - | - |
| Street Lighting | | PCust04 | | - | - | 143,087,299 | - | - | - | - | - | - |
| Average Customers | | PCust01 | | 20 | 1 | 173,293 | 108 | 1,331 | 4 | 10 | - | - |
| Average Customers (Lighting = 9 Lights per Cust) | | PCust06 | | 20 | 1 | 19,255 | 12 | 148 | 4 | 10 | - | - |
| Average Secondary Customers | | PCust07 | | - | - | 19,255 | 12 | 148 | - | 20 | - | - |
| Average Primary Customers | | PCust08 | | - | - | 19,255 | 12 | 148 | 4 | 10 | - | - |
| Average Transformer Customers | | PCust09 | | - | - | 19,255 | 12 | 148 | 4 | 10 | - | - |
| Demand Allocators | | | | | | | | | | | | |
| Maximum Class Non-Coincident Peak Demands (Transm NCPT | | | | 222,254 | 148,927 | 29,996 | 1,091 | 294 | 414 | 3 | - | - |
| Maximum Class Non-Coincident Peak Demands (Primary NCPP | | | | - | - | 29,996 | 1,091 | 294 | 414 | 3 | - | - |
| Sum of the Individual Customer Demands (Transformer) SICDT | | | | - | - | 29,996 | 1,091 | 294 | 705 | 3 | - | - |
| Sum of the Individual Customer Demands (Secondary) SICD | | | | - | - | 29,996 | 1,091 | 294 | - | 3 | - | - |
| LOLP Demand Allocator | | LOLP | | 145,533 | 60,265 | 393 | 14 | 234 | 30 | 2 | - | - |

KENTUCKY UTILITIES COMPANY
Cost of Service Study
Class Allocation
12 Months Ended June 30, 2022

Exhibit WSS-31
Page 31 of 36

LOLP Methodology

| Description | Ref | Name | Allocation Vector | Total System | Residential Rate RS | General Service GS | All Electric Schools AES | Power Service PS-Secondary | Power Service PS-Primary | Time of Day TOD-Secondary | Time of Day TOD-Primary |
|--|-----|------------|-------------------|---------------|---------------------|--------------------|--------------------------|----------------------------|--------------------------|---------------------------|-------------------------|
| Production Demand Cost Allocation | | | | | | | | | | | |
| Gross Plant Production Residual LOLP Demand Allocat | | GPPLLOPDRA | | 2,463,591 | 1,011,037 | 272,317 | 17,474 | 253,947 | 11,033 | 244,227 | 447,085 |
| Gross Plant Production LOLP Demand Costs | \$ | | | 6,073,014,123 | | | | | | | |
| Customer Specific Assignment | \$ | | | 3,728,601 | | | | | | | |
| Gross Plant Production LOLP Demand Residual | \$ | GPPLLOPDRA | | 6,069,285,522 | 2,490,784,384 | 670,878,802 | 43,048,460 | 625,621,337 | 27,180,233 | 601,676,613 | 1,101,435,630 |
| Gross Plant Production LOLP Demand Total | \$ | GPPLLOPDT | | 6,073,014,123 | 2,490,784,384 | 670,878,802 | 43,048,460 | 625,621,337 | 27,180,233 | 601,676,613 | 1,101,435,630 |
| Gross Plant Production LOLP Demand Allocator | | GPLOLPDA | GPPLLOPDT | 1.000000 | 0.41014 | 0.11047 | 0.00709 | 0.10302 | 0.00448 | 0.09907 | 0.18137 |
| Net Production Residual LOLP Demand Allocator | | NPPLLOPDRA | | 2,463,591 | 1,011,037 | 272,317 | 17,474 | 253,947 | 11,033 | 244,227 | 447,085 |
| Net Production LOLP Demand Costs | \$ | | | 3,680,027,941 | | | | | | | |
| Customer Specific Assignment | \$ | | | 3,513,380 | | | | | | | |
| Net Production LOLP Demand Residual | \$ | NPPLLOPDRA | | 3,676,514,562 | 1,508,811,050 | 406,389,793 | 26,076,923 | 378,974,749 | 16,464,627 | 364,470,055 | 667,202,773 |
| Net Production LOLP Demand Total | \$ | NPPLLOPDT | | 3,680,027,941 | 1,508,811,050 | 406,389,793 | 26,076,923 | 378,974,749 | 16,464,627 | 364,470,055 | 667,202,773 |
| Net Production LOLP Demand Allocator | | NPLOLPDA | NPPLLOPDT | 1.000000 | 0.41000 | 0.11043 | 0.00709 | 0.10298 | 0.00447 | 0.09904 | 0.18130 |
| Rate Base Production Residual LOLP Demand Allocator | | RBLLOPDRA | | 2,463,591 | 1,011,037 | 272,317 | 17,474 | 253,947 | 11,033 | 244,227 | 447,085 |
| Rate Base Production LOLP Demand Costs | \$ | | | 2,975,438,420 | | | | | | | |
| Customer Specific Assignment | \$ | | | 2,867,904 | | | | | | | |
| Rate Base Production LOLP Demand Residual | \$ | RBLLOPDRA | | 2,972,570,516 | 1,219,918,258 | 328,578,140 | 21,083,962 | 306,412,268 | 13,312,137 | 294,684,795 | 539,453,131 |
| Rate Base Production LOLP Demand Total | \$ | RBLLOPDT | | 2,975,438,420 | 1,219,918,258 | 328,578,140 | 21,083,962 | 306,412,268 | 13,312,137 | 294,684,795 | 539,453,131 |
| Rate Base Production LOLP Demand Allocator | | RBLLOPDA | RBLLOPDT | 1.000000 | 0.41000 | 0.11043 | 0.00709 | 0.10298 | 0.00447 | 0.09904 | 0.18130 |
| Production O&M Residual LOLP Demand Allocator | | POMLOPDRA | | 2,463,591 | 1,011,037 | 272,317 | 17,474 | 253,947 | 11,033 | 244,227 | 447,085 |
| Production O&M LOLP Demand Costs | \$ | | | 133,195,931 | | | | | | | |
| Customer Specific Assignment | \$ | | | 91,514 | | | | | | | |
| Production O&M LOLP Demand Residual | \$ | POMLOPDRA | | 133,104,417 | 54,624,948 | 14,712,923 | 944,088 | 13,720,390 | 596,085 | 13,195,262 | 24,155,388 |
| Production O&M LOLP Demand Total | \$ | POMLOPDT | | 133,195,931 | 54,624,948 | 14,712,923 | 944,088 | 13,720,390 | 596,085 | 13,195,262 | 24,155,388 |
| Production O&M LOLP Demand Allocator | | POMLOLPDA | POMLOPDT | 1.000000 | 0.41011 | 0.11046 | 0.00709 | 0.10301 | 0.00448 | 0.09907 | 0.18135 |
| Production Depreciation Residual LOLP Demand Allocat | | PDEPLOPDRA | | 2,463,591 | 1,011,037 | 272,317 | 17,474 | 253,947 | 11,033 | 244,227 | 447,085 |
| Production Depreciation LOLP Demand Costs | \$ | | | 288,540,356 | | | | | | | |
| Customer Specific Assignment | \$ | | | 120,931 | | | | | | | |
| Production Depreciation LOLP Demand Residual | \$ | PDEPLOPDRA | | 288,419,425 | 118,364,937 | 31,880,932 | 2,045,712 | 29,730,245 | 1,291,636 | 28,592,364 | 52,341,487 |
| Production Depreciation LOLP Demand Total | \$ | PDEPLOPDT | | 288,540,356 | 118,364,937 | 31,880,932 | 2,045,712 | 29,730,245 | 1,291,636 | 28,592,364 | 52,341,487 |
| Production Depreciation LOLP Demand Allocator | | PDEPLOPDA | PDEPLOPDT | 1.000000 | 0.41022 | 0.11049 | 0.00709 | 0.10304 | 0.00448 | 0.09909 | 0.18140 |
| Production Prop Tax Residual LOLP Demand Allocator | | PPTLOPDRA | | 2,463,591 | 1,011,037 | 272,317 | 17,474 | 253,947 | 11,033 | 244,227 | 447,085 |
| Production Prop Tax LOLP Demand Costs | \$ | | | 22,386,637 | | | | | | | |
| Customer Specific Assignment | \$ | | | 4,608 | | | | | | | |
| Production Prop Tax LOLP Demand Residual | \$ | PPTLOPDRA | | 22,382,029 | 9,185,399 | 2,474,036 | 158,752 | 2,307,137 | 100,234 | 2,218,835 | 4,061,823 |
| Production Prop Tax LOLP Demand Total | \$ | PPTLOPDT | | 22,386,637 | 9,185,399 | 2,474,036 | 158,752 | 2,307,137 | 100,234 | 2,218,835 | 4,061,823 |
| Production Prop Tax LOLP Demand Allocator | | PPTLOPDA | PPTLOPDT | 1.000000 | 0.41031 | 0.11051 | 0.00709 | 0.10306 | 0.00448 | 0.09911 | 0.18144 |

KENTUCKY UTILITIES COMPANY
Cost of Service Study
Class Allocation
12 Months Ended June 30, 2022

LOLP Methodology

| Description | Ref | Name | Allocation Vector | Retail Transmission Service | Fluctuating Load Service | Outdoor Lighting | Lighting Energy | Traffic Energy | Outdoor Sports Lighting | Electric Vehicle Charging | Solar Share | Business Solar |
|--|-----|-----------------------|-------------------|-----------------------------|--------------------------|------------------|-----------------|----------------|-------------------------|---------------------------|--------------|----------------|
| | | | | RTS - Transmission | FLS - Transmission | LS & RLS | LE | TE | OSL | EV | SSP | BS |
| Production Demand Cost Allocation | | | | | | | | | | | | |
| Gross Plant Production Residual LOLP Demand Allocat | | GPPLLOLPDRA | | 145,533 | 60,265 | 393 | 14 | 234 | 30 | 2 | - | - |
| Gross Plant Production LOLP Demand Costs | | | | | | | | | | | | |
| Customer Specific Assignment | | | | | | | | | | | | |
| Gross Plant Production LOLP Demand Residual | | GPPLLOLPDRA | \$ | 358,533,878 | \$ 148,468,386 | \$ 967,726 | \$ 35,209 | \$ 575,745 | \$ 74,108 | \$ 5,011 | \$ 3,325,058 | \$ 403,543 |
| Gross Plant Production LOLP Demand Total | | GPPLLOLPDT | \$ | 358,533,878 | \$ 148,468,386 | \$ 967,726 | \$ 35,209 | \$ 575,745 | \$ 74,108 | \$ 5,011 | \$ 3,325,058 | \$ 403,543 |
| Gross Plant Production LOLP Demand Allocator | | GPLOLPDA GPPLLOLPDT | | 0.05904 | 0.02445 | 0.00016 | 0.00001 | 0.00009 | 0.00001 | 0.00000 | 0.00055 | 0.00007 |
| Net Production Residual LOLP Demand Allocator | | NPPLLOLPDRA | | 145,533 | 60,265 | 393 | 14 | 234 | 30 | 2 | - | - |
| Net Production LOLP Demand Costs | | | | | | | | | | | | |
| Customer Specific Assignment | | | | | | | | | | | | |
| Net Production LOLP Demand Residual | | NPPLLOLPDRA | \$ | 217,184,547 | \$ 89,935,822 | \$ 586,207 | \$ 21,328 | \$ 348,762 | \$ 44,892 | \$ 3,036 | \$ 3,141,953 | \$ 371,427 |
| Net Production LOLP Demand Total | | NPPLLOLPDT | \$ | 217,184,547 | \$ 89,935,822 | \$ 586,207 | \$ 21,328 | \$ 348,762 | \$ 44,892 | \$ 3,036 | \$ 3,141,953 | \$ 371,427 |
| Net Production LOLP Demand Allocator | | NPLOLPDA NPPLLOLPDT | | 0.05902 | 0.02444 | 0.00016 | 0.00001 | 0.00009 | 0.00001 | 0.00000 | 0.00085 | 0.00010 |
| Rate Base Production Residual LOLP Demand Allocator | | RBLLOLPDRA | | 145,533 | 60,265 | 393 | 14 | 234 | 30 | 2 | - | - |
| Rate Base Production LOLP Demand Costs | | | | | | | | | | | | |
| Customer Specific Assignment | | | | | | | | | | | | |
| Rate Base Production LOLP Demand Residual | | RBLLOLPDRA | \$ | 175,600,115 | \$ 72,715,766 | \$ 473,966 | \$ 17,244 | \$ 281,984 | \$ 36,296 | \$ 2,454 | \$ 2,576,969 | \$ 290,934 |
| Rate Base Production LOLP Demand Total | | RBLLOLPDT | \$ | 175,600,115 | \$ 72,715,766 | \$ 473,966 | \$ 17,244 | \$ 281,984 | \$ 36,296 | \$ 2,454 | \$ 2,576,969 | \$ 290,934 |
| Rate Base Production LOLP Demand Allocator | | RBLLOLPDA RBLLOLPDT | | 0.05902 | 0.02444 | 0.00016 | 0.00001 | 0.00009 | 0.00001 | 0.00000 | 0.00087 | 0.00010 |
| Production O&M Residual LOLP Demand Allocator | | POMLOLPDRA | | 145,533 | 60,265 | 393 | 14 | 234 | 30 | 2 | - | - |
| Production O&M LOLP Demand Costs | | | | | | | | | | | | |
| Customer Specific Assignment | | | | | | | | | | | | |
| Production O&M LOLP Demand Residual | | POMLOLPDRA | \$ | 7,862,942 | \$ 3,256,034 | \$ 21,223 | \$ 772 | \$ 12,627 | \$ 1,625 | \$ 110 | \$ 91,514 | \$ - |
| Production O&M LOLP Demand Total | | POMLOLPDT | \$ | 7,862,942 | \$ 3,256,034 | \$ 21,223 | \$ 772 | \$ 12,627 | \$ 1,625 | \$ 110 | \$ 91,514 | \$ - |
| Production O&M LOLP Demand Allocator | | POMLOLPDA/ POMLOLPDT | | 0.05903 | 0.02445 | 0.00016 | 0.00001 | 0.00009 | 0.00001 | 0.00000 | 0.00069 | - |
| Production Depreciation Residual LOLP Demand Allocat | | PDEPLOLPDRA | | 145,533 | 60,265 | 393 | 14 | 234 | 30 | 2 | - | - |
| Production Depreciation LOLP Demand Costs | | | | | | | | | | | | |
| Customer Specific Assignment | | | | | | | | | | | | |
| Production Depreciation LOLP Demand Residual | | PDEPLOLPDRA | \$ | 17,037,942 | \$ 7,055,388 | \$ 45,987 | \$ 1,673 | \$ 27,360 | \$ 3,522 | \$ 238 | \$ 106,487 | \$ 14,444 |
| Production Depreciation LOLP Demand Total | | PDEPLOLPDT | \$ | 17,037,942 | \$ 7,055,388 | \$ 45,987 | \$ 1,673 | \$ 27,360 | \$ 3,522 | \$ 238 | \$ 106,487 | \$ 14,444 |
| Production Depreciation LOLP Demand Allocator | | PDEPLOLPDA PDEPLOLPDT | | 0.05905 | 0.02445 | 0.00016 | 0.00001 | 0.00009 | 0.00001 | 0.00000 | 0.00037 | 0.00005 |
| Production Prop Tax Residual LOLP Demand Allocator | | PPTLOLPDRA | | 145,533 | 60,265 | 393 | 14 | 234 | 30 | 2 | - | - |
| Production Prop Tax LOLP Demand Costs | | | | | | | | | | | | |
| Customer Specific Assignment | | | | | | | | | | | | |
| Production Prop Tax LOLP Demand Residual | | PPTLOLPDRA | \$ | 1,322,185 | \$ 547,515 | \$ 3,569 | \$ 130 | \$ 2,123 | \$ 273 | \$ 18 | \$ 4,039 | \$ 569 |
| Production Prop Tax LOLP Demand Total | | PPTLOLPDT | \$ | 1,322,185 | \$ 547,515 | \$ 3,569 | \$ 130 | \$ 2,123 | \$ 273 | \$ 18 | \$ 4,039 | \$ 569 |
| Production Prop Tax LOLP Demand Allocator | | PPTLOLPDA PPTLOLPDT | | 0.05906 | 0.02446 | 0.00016 | 0.00001 | 0.00009 | 0.00001 | 0.00000 | 0.00018 | 0.00003 |

KENTUCKY UTILITIES COMPANY
Cost of Service Study
Class Allocation
12 Months Ended June 30, 2022

LOLP Methodology

| Description | Ref | Name | Allocation Vector | Total System | Residential Rate RS | General Service GS | All Electric Schools AES | Power Service PS-Secondary | Power Service PS-Primary | Time of Day TOD-Secondary | Time of Day TOD-Primary |
|---|-----|-------|-------------------|--------------|---------------------|--------------------|--------------------------|----------------------------|--------------------------|---------------------------|-------------------------|
| Meter Cost Allocation | | | | | | | | | | | |
| Meters Gross Plant Residual Allocator | | MGPRA | | 49,194,750 | 29,720,264 | 11,993,013 | 244,803 | 3,749,767 | 733,308 | 670,691 | 1,299,034 |
| Meters Gross Plant Costs | | | \$ | 77,142,557 | | | | | | | |
| Customer Specific Assignment | | | \$ | 159,234 | | | | | | | |
| Meters Gross Plant Residual | | MGPRA | \$ | 76,983,323 | 46,508,310 | 18,767,490 | 383,084 | 5,867,892 | 1,147,531 | 1,049,543 | 2,032,818 |
| Meters Gross Plant Total | | MGPT | \$ | 77,142,557 | 46,508,310 | 18,767,490 | 383,084 | 5,867,892 | 1,147,531 | 1,049,543 | 2,032,818 |
| Meters Gross Plant Allocator | | MGPA | | 1.000000 | 0.60289 | 0.24328 | 0.00497 | 0.07607 | 0.01488 | 0.01361 | 0.02635 |
| Meters Net Plant Residual Allocator | | MNPRA | | 49,194,750 | 29,720,264 | 11,993,013 | 244,803 | 3,749,767 | 733,308 | 670,691 | 1,299,034 |
| Meters Net Plant Costs | | | \$ | 53,653,152 | | | | | | | |
| Customer Specific Assignment | | | \$ | 120,013 | | | | | | | |
| Meters Net Plant Residual | | MNPRA | \$ | 53,533,140 | 32,341,236 | 13,050,653 | 266,391 | 4,080,451 | 797,977 | 729,838 | 1,413,594 |
| Meters Net Plant Total | | MNPT | \$ | 53,653,152 | 32,341,236 | 13,050,653 | 266,391 | 4,080,451 | 797,977 | 729,838 | 1,413,594 |
| Meters Net Plant Allocator | | MNPA | | 1.000000 | 0.60278 | 0.24324 | 0.00497 | 0.07605 | 0.01487 | 0.01360 | 0.02635 |
| Meters Rate Base Residual Allocator | | MRBRA | | 49,194,750 | 29,720,264 | 11,993,013 | 244,803 | 3,749,767 | 733,308 | 670,691 | 1,299,034 |
| Meters Rate Base Costs | | | \$ | 45,031,431 | | | | | | | |
| Customer Specific Assignment | | | \$ | 89,399 | | | | | | | |
| Meters Rate Base Residual | | MRBRA | \$ | 44,942,032 | 27,151,049 | 10,956,258 | 223,640 | 3,425,612 | 669,916 | 612,712 | 1,186,737 |
| Meters Rate Base Total | | MRBT | \$ | 45,031,431 | 27,151,049 | 10,956,258 | 223,640 | 3,425,612 | 669,916 | 612,712 | 1,186,737 |
| Meters Rate Base Allocator | | MRBA | | 1.000000 | 0.60294 | 0.24330 | 0.00497 | 0.07607 | 0.01488 | 0.01361 | 0.02635 |
| Meters O&M Residual Allocator | | MOMRA | | 49,194,750 | 29,720,264 | 11,993,013 | 244,803 | 3,749,767 | 733,308 | 670,691 | 1,299,034 |
| Meters O&M Costs | | | \$ | 11,537,188 | | | | | | | |
| Customer Specific Assignment | | | \$ | - | | | | | | | |
| Meters O&M Residual | | MOMRA | \$ | 11,537,188 | 6,970,017 | 2,812,610 | 57,411 | 879,398 | 171,976 | 157,291 | 304,650 |
| Meters O&M Total | | MOMT | \$ | 11,537,188 | 6,970,017 | 2,812,610 | 57,411 | 879,398 | 171,976 | 157,291 | 304,650 |
| Meters O&M Allocator | | MOMA | | 1.000000 | 0.60413 | 0.24379 | 0.00498 | 0.07622 | 0.01491 | 0.01363 | 0.02641 |
| Meters Depreciation Residual Allocator | | MDRA | | 49,194,750 | 29,720,264 | 11,993,013 | 244,803 | 3,749,767 | 733,308 | 670,691 | 1,299,034 |
| Meters Depreciation Costs | | | \$ | 1,599,033 | | | | | | | |
| Customer Specific Assignment | | | \$ | 15,923 | | | | | | | |
| Meters Depreciation Residual | | MDRA | \$ | 1,583,110 | 956,412 | 385,941 | 7,878 | 120,669 | 23,598 | 21,583 | 41,804 |
| Meters Depreciation Total | | MDT | \$ | 1,599,033 | 956,412 | 385,941 | 7,878 | 120,669 | 23,598 | 21,583 | 41,804 |
| Meters Depreciation Allocator | | MDA | | 1.000000 | 0.59812 | 0.24136 | 0.00493 | 0.07546 | 0.01476 | 0.01350 | 0.02614 |
| Meters Prop Tax Residual Allocator | | MPTRA | | 49,194,750 | 29,720,264 | 11,993,013 | 244,803 | 3,749,767 | 733,308 | 670,691 | 1,299,034 |
| Meters Prop Tax Costs | | | \$ | 286,653 | | | | | | | |
| Customer Specific Assignment | | | \$ | 1,987 | | | | | | | |
| Meters Prop Tax Residual | | MPTRA | \$ | 284,666 | 171,977 | 69,398 | 1,417 | 21,698 | 4,243 | 3,881 | 7,517 |
| Meters Prop Tax Total | | MPTT | \$ | 286,653 | 171,977 | 69,398 | 1,417 | 21,698 | 4,243 | 3,881 | 7,517 |
| Meters Prop Tax Allocator | | MPTA | | 1.000000 | 0.59995 | 0.24210 | 0.00494 | 0.07569 | 0.01480 | 0.01354 | 0.02622 |
| Customer Service O&M Cost Allocation | | | | | | | | | | | |
| Customer Service Residual Allocator | | CSRA | | 550,667 | 442,342 | 82,784 | 424 | 4,441 | 204 | 766 | 256 |
| Customer Service O&M Costs | | | \$ | 7,173,760 | | | | | | | |
| Customer Specific Assignment | | | \$ | 25,500 | | | | | | | |
| Customer Service O&M Residual | | CSRA | \$ | 7,148,260 | 5,742,083 | 1,074,627 | 5,504 | 57,649 | 2,648 | 9,944 | 3,323 |
| Customer Service O&M Total | | CSOT | \$ | 7,173,760 | 5,742,083 | 1,074,627 | 5,504 | 57,649 | 2,648 | 9,944 | 3,323 |
| Customer Service O&M Allocator | | C10 | | 1.000000 | 0.80043 | 0.14980 | 0.00077 | 0.00804 | 0.00037 | 0.00139 | 0.00046 |

KENTUCKY UTILITIES COMPANY
Cost of Service Study
Class Allocation
12 Months Ended June 30, 2022

LOLP Methodology

| Description | Ref | Name | Allocation Vector | Retail Transmission Service | Fluctuating Load Service | Outdoor Lighting | Lighting Energy | Traffic Energy | Outdoor Sports Lighting | Electric Vehicle Charging | Solar Share | Business Solar |
|---|-----|-------|-------------------|-----------------------------|--------------------------|------------------|-----------------|----------------|-------------------------|---------------------------|-------------|----------------|
| | | | | RTS - Transmission | FLS - Transmission | LS & RLS | LE | TE | OSL | EV | SSP | BS |
| Meter Cost Allocation | | | | | | | | | | | | |
| Meters Gross Plant Residual Allocator | | MGPRA | | 644,052 | 39,757 | - | 7,256 | 89,428 | 3,378 | - | - | - |
| Meters Gross Plant Costs | | | | | | | | | | | | 0 |
| Customer Specific Assignment | | | | | | | | | | \$ | 159,234 | \$ |
| Meters Gross Plant Residual | | MGPT | MGPRA | \$ 1,007,857 | \$ 62,215 | \$ - | \$ 11,355 | \$ 139,943 | \$ 5,286 | \$ - | \$ - | \$ - |
| Meters Gross Plant Total | | MGPT | MGPRA | \$ 1,007,857 | \$ 62,215 | \$ - | \$ 11,355 | \$ 139,943 | \$ 5,286 | \$ 159,234 | \$ - | \$ - |
| Meters Gross Plant Allocator | | MGPA | MGPT | 0.01306 | 0.00081 | - | 0.00015 | 0.00181 | 0.00007 | 0.00206 | - | - |
| Meters Net Plant Residual Allocator | | MNPRA | | 644,052 | 39,757 | - | 7,256 | 89,428 | 3,378 | - | - | - |
| Meters Net Plant Costs | | | | | | | | | | | | - |
| Customer Specific Assignment | | | | | | | | | | \$ | 120,013 | \$ - |
| Meters Net Plant Residual | | MNPT | MNPRA | \$ 700,850 | \$ 43,263 | \$ - | \$ 7,896 | \$ 97,314 | \$ 3,676 | \$ - | \$ - | \$ - |
| Meters Net Plant Total | | MNPT | MNPRA | \$ 700,850 | \$ 43,263 | \$ - | \$ 7,896 | \$ 97,314 | \$ 3,676 | \$ 120,013 | \$ - | \$ - |
| Meters Net Plant Allocator | | MNPA | MNPT | 0.01306 | 0.00081 | - | 0.00015 | 0.00181 | 0.00007 | 0.00224 | - | - |
| Meters Rate Base Residual Allocator | | MRBRA | | 644,052 | 39,757 | - | 7,256 | 89,428 | 3,378 | - | - | - |
| Meters Rate Base Costs | | | | | | | | | | | | - |
| Customer Specific Assignment | | | | | | | | | | \$ | 89,399 | \$ - |
| Meters Rate Base Residual | | MRBT | MRBRA | \$ 588,376 | \$ 36,320 | \$ - | \$ 6,629 | \$ 81,697 | \$ 3,086 | \$ - | \$ - | \$ - |
| Meters Rate Base Total | | MRBT | MRBRA | \$ 588,376 | \$ 36,320 | \$ - | \$ 6,629 | \$ 81,697 | \$ 3,086 | \$ 89,399 | \$ - | \$ - |
| Meters Rate Base Allocator | | MRBA | MRBT | 0.01307 | 0.00081 | - | 0.00015 | 0.00181 | 0.00007 | 0.00199 | - | - |
| Meters O&M Residual Allocator | | MOMRA | | 644,052 | 39,757 | - | 7,256 | 89,428 | 3,378 | - | - | - |
| Meters O&M Costs | | | | | | | | | | | | - |
| Customer Specific Assignment | | | | | | | | | | \$ | - | \$ - |
| Meters O&M Residual | | MOMT | MOMRA | \$ 151,044 | \$ 9,324 | \$ - | \$ 1,702 | \$ 20,973 | \$ 792 | \$ - | \$ - | \$ - |
| Meters O&M Total | | MOMT | MOMRA | \$ 151,044 | \$ 9,324 | \$ - | \$ 1,702 | \$ 20,973 | \$ 792 | \$ - | \$ - | \$ - |
| Meters O&M Allocator | | MOMA | MOMT | 0.01309 | 0.00081 | - | 0.00015 | 0.00182 | 0.00007 | - | - | - |
| Meters Depreciation Residual Allocator | | MDRA | | 644,052 | 39,757 | - | 7,256 | 89,428 | 3,378 | - | - | - |
| Meters Depreciation Costs | | | | | | | | | | | | - |
| Customer Specific Assignment | | | | | | | | | | \$ | 15,923 | \$ - |
| Meters Depreciation Residual | | MDT | MDRA | \$ 20,726 | \$ 1,279 | \$ - | \$ 234 | \$ 2,878 | \$ 109 | \$ - | \$ - | \$ - |
| Meters Depreciation Total | | MDT | MDRA | \$ 20,726 | \$ 1,279 | \$ - | \$ 234 | \$ 2,878 | \$ 109 | \$ 15,923 | \$ - | \$ - |
| Meters Depreciation Allocator | | MDA | MDT | 0.01296 | 0.00080 | - | 0.00015 | 0.00180 | 0.00007 | 0.00996 | - | - |
| Meters Prop Tax Residual Allocator | | MPTRA | | 644,052 | 39,757 | - | 7,256 | 89,428 | 3,378 | - | - | - |
| Meters Prop Tax Costs | | | | | | | | | | | | - |
| Customer Specific Assignment | | | | | | | | | | \$ | 1,987 | \$ - |
| Meters Prop Tax Residual | | MPTT | MPTRA | \$ 3,727 | \$ 230 | \$ - | \$ 42 | \$ 517 | \$ 20 | \$ - | \$ - | \$ - |
| Meters Prop Tax Total | | MPTT | MPTRA | \$ 3,727 | \$ 230 | \$ - | \$ 42 | \$ 517 | \$ 20 | \$ 1,987 | \$ - | \$ - |
| Meters Prop Tax Allocator | | MPTA | MPTT | 0.01300 | 0.00080 | - | 0.00015 | 0.00181 | 0.00007 | 0.00693 | - | - |
| Customer Service O&M Cost Allocation | | | | | | | | | | | | |
| Customer Service Residual Allocator | | CSRA | | 20 | 1 | 19,255 | 12 | 148 | 4 | 10 | - | - |
| Customer Service O&M Costs | | | | | | | | | | | | - |
| Customer Specific Assignment | | | | | | | | | | \$ | 18,500 | \$ - |
| Customer Service O&M Residual | | CSOT | CSRA | \$ 260 | \$ 13 | \$ 249,951 | \$ 156 | \$ 1,921 | \$ 52 | \$ 130 | \$ - | \$ - |
| Customer Service O&M Total | | CSOT | CSRA | \$ 260 | \$ 13 | \$ 249,951 | \$ 156 | \$ 1,921 | \$ 52 | \$ 18,630 | \$ - | \$ - |
| Customer Service O&M Allocator | | C10 | CSOT | 0.00004 | 0.00000 | 0.03484 | 0.00002 | 0.00027 | 0.00001 | 0.00260 | - | 0.00098 |

KENTUCKY UTILITIES COMPANY
Cost of Service Study
Class Allocation
12 Months Ended June 30, 2022

LOLP Methodology

| Description | Ref | Name | Allocation Vector | Retail Transmission | Fluctuating Load | Outdoor Lighting | Lighting Energy | Traffic Energy | Outdoor Sports | Electric Vehicle | Solar Share | Business Solar |
|--------------------------------------|-----|----------|----------------------|---------------------|--------------------|------------------|-----------------|----------------|----------------|------------------|-------------|----------------|
| | | | | Service | Service | Lighting | Energy | Energy | Lighting | Charging | Share | Solar |
| | | | | RTS - Transmission | FLS - Transmission | LS & RLS | LE | TE | OSL | EV | SSP | BS |
| Revenue Adjustment Allocators | | | | | | | | | | | | |
| Late Payment Revenue | | LPAY | | 874 | 44 | 3,359 | - | - | - | - | - | - |
| Misc Service Revenue Allocator | | MISCSERV | | 3,806 | 190 | 8,439 | - | - | - | - | - | - |
| Reconnect Charges | | RECON | | 11 | 1 | 168 | - | - | - | - | - | - |
| Return Check Charges | | RETURN | | 3 | 0 | 25 | - | - | - | - | - | - |
| Rent From Electric Property | | RFEF | | 225,552,349 | 104,343,933 | 113,343,713 | 398,777 | 615,338 | 174,679 | - | - | - |
| Interruptible Credit Allocator | | INTCRE | | 358,533,878 | 148,468,386 | 967,726 | 35,209 | 575,745 | 74,108 | - | - | - |
| Base Rate Revenue | | | | 82,247,981 | 32,956,814 | 30,555,893 | 307,246 | 271,291 | 92,320 | 1,533 | 162,504 | - |
| Operation and Maintenance Less Fuel | | OMLF | | 10,977,306 | 5,227,214 | 5,822,389 | 26,421 | 63,498 | 12,458 | 21,111 | 91,514 | - |
| CSR Avoided Cost | | | | | | | | | | | | |
| Interruptible Demand | | | | 573,919 | 2,409,406 | | | | | | | - |
| Avoided Cost per kW | | | | \$ (5.90) | \$ (5.90) | | | | | | | - |
| Avoided Cost | | | | \$ (3,386,120) | \$ (14,215,494) | | | | | | | - |

Exhibit WSS-32

Electric Cost of Service Study

Class Allocation

(Louisville Gas and Electric Company)

LOUISVILLE GAS AND ELECTRIC COMPANY
Cost of Service Study
Class Allocation

12 Months Ended
June 30, 2022

| | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | |
|--|-----|--------|-------------------|------------------|---------------------|-------------------------|-----------------|-------------------|------------------|--------------------|-----------------------|---------------------------|
| Description | Ref | Name | Allocation Vector | Total System | Residential Rate RS | General Service Rate GS | Rate PS Primary | Rate PS Secondary | Rate TOD Primary | Rate TOD Secondary | Rate RTS Transmission | Special Contract Customer |
| Plant in Service | | | | | | | | | | | | |
| Power Production Plant | | | | | | | | | | | | |
| Production Demand - LOLP | TUP | PLPPLP | GPLPDPDA | \$ 3,865,573,604 | \$ 1,843,044,295 | \$ 434,979,325 | \$ 29,452,187 | \$ 487,053,951 | \$ 462,893,194 | \$ 380,591,965 | \$ 211,887,495 | \$ 11,650,517 |
| Production Energy | TUP | PLPPEB | E01 | - | - | - | - | - | - | - | - | - |
| Total Power Production Plant | | PLPPT | | \$ 3,865,573,604 | \$ 1,843,044,295 | \$ 434,979,325 | \$ 29,452,187 | \$ 487,053,951 | \$ 462,893,194 | \$ 380,591,965 | \$ 211,887,495 | \$ 11,650,517 |
| Transmission Plant | | | | | | | | | | | | |
| Transmission Demand | TUP | PLTRB | NCPT | \$ 612,587,887 | \$ 289,827,323 | \$ 70,795,598 | \$ 4,647,245 | \$ 78,773,671 | \$ 66,061,501 | \$ 62,543,037 | \$ 32,615,094 | \$ 2,095,869 |
| Distribution Poles | | | | | | | | | | | | |
| Specific | TUP | PLDPS | NCPP | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Distribution Substation | | | | | | | | | | | | |
| General | TUP | PLDSG | NCPP | \$ 234,986,652 | \$ 117,428,875 | \$ 28,684,140 | \$ 1,882,917 | \$ 31,916,603 | \$ 26,766,033 | \$ 25,340,463 | \$ - | \$ 849,180 |
| Distribution Primary & Secondary Lines | | | | | | | | | | | | |
| Primary Specific | TUP | PLDPLS | NCPP | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Primary Demand | TUP | PLDPLD | NCPP | 360,746,498 | 180,274,304 | 44,035,280 | 2,890,614 | 48,997,688 | 41,090,643 | 38,902,138 | - | 1,303,643 |
| Primary Customer | TUP | PLDPLC | PCust08 | 590,335,970 | 511,648,810 | 61,431,953 | 94,861 | 3,771,400 | 178,881 | 684,354 | 17,617 | 2,710 |
| Secondary Demand | TUP | PLDSL | SICD | 100,651,565 | 76,294,060 | 12,193,195 | - | 11,548,657 | - | - | - | - |
| Secondary Customer | TUP | PLDSC | PCust07 | 171,988,888 | 150,203,342 | 18,034,410 | 27,848 | - | 52,514 | - | - | - |
| Total Distribution Primary & Secondary Lines | | PLDLT | | \$ 1,223,722,920 | \$ 918,420,516 | \$ 135,694,838 | \$ 3,013,323 | \$ 64,317,745 | \$ 41,322,037 | \$ 39,586,492 | \$ 17,617 | \$ 1,306,353 |
| Distribution Line Transformers | | | | | | | | | | | | |
| Demand | TUP | PLDLTD | SICDT | \$ 123,303,836 | \$ 85,300,381 | \$ 13,632,571 | \$ - | \$ 12,911,946 | \$ - | \$ 10,770,607 | \$ - | \$ - |
| Customer | TUP | PLDLTC | PCust09 | 68,730,533 | 59,598,980 | 7,155,849 | - | 439,308 | - | 79,716 | - | - |
| Total Distribution Line Transformers | | PLDLTT | | \$ 192,034,369 | \$ 144,899,361 | \$ 20,788,420 | \$ - | \$ 13,351,255 | \$ - | \$ 10,850,323 | \$ - | \$ - |
| Distribution Services | | | | | | | | | | | | |
| Customer | TUP | PLDSC | C02 | \$ 43,944,308 | \$ 37,850,187 | \$ 5,390,780 | \$ - | \$ 554,489 | \$ - | \$ 148,652 | \$ - | \$ - |
| Distribution Meters | | | | | | | | | | | | |
| Customer | TUP | PLDMC | MGPA | \$ 44,815,612 | \$ 30,508,190 | \$ 9,479,010 | \$ 309,833 | \$ 2,650,782 | \$ 618,860 | \$ 524,043 | \$ 437,345 | \$ 9,406 |
| Distribution Street & Customer Lighting | | | | | | | | | | | | |
| Customer | TUP | PLDSCL | PCust04 | \$ 144,886,355 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Customer Accounts Expense | | | | | | | | | | | | |
| Customer | TUP | PLCAE | PCust05 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Customer Service & Info. | | | | | | | | | | | | |
| Customer | TUP | PLCSI | PCust06 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Sales Expense | | | | | | | | | | | | |
| Customer | TUP | PLSEC | PCust06 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Total | | PLT | | \$ 6,362,551,708 | \$ 3,381,978,746 | \$ 705,812,112 | \$ 39,305,506 | \$ 678,618,495 | \$ 597,661,624 | \$ 519,584,976 | \$ 244,957,551 | \$ 15,911,324 |

LOUISVILLE GAS AND ELECTRIC COMPANY
Cost of Service Study
Class Allocation

12 Months Ended
June 30, 2022

| Description | Ref | 1 Name | 2 Allocation Vector | 12 | | 13 | | 14 | | 15 | | 16 | | 17 | | 18 | |
|--|-----|-----------|---------------------------|---------------------------------|----------------------------|-------------------------------------|--|---|-------------------------|---------------------------|------|------|------|------|------|------|------|
| | | | | Street Lighting Rate RLS, LS | Street Lighting Rate LE | Traffic Street Lighting Rate TLE | Outdoor Sports Lighting Rate OSL | Electric Vehicle Charging Rate EV | Solar Share Rate SSP | Business Solar Rate BS | | | | | | | |
| Plant in Service | | | | | | | | | | | | | | | | | |
| Power Production Plant | | | | | | | | | | | | | | | | | |
| Production Demand - LOLP | TUP | PLPPLP | GPLOLPDA | \$ 646,656 | \$ 22,523 | \$ 627,517 | \$ 1,493 | \$ 6,773 | \$ 2,630,743 | \$ 84,972 | | | | | | | |
| Production Energy | TUP | PLPPEB | E01 | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| Total Power Production Plant | | PLPPT | | \$ 646,656 | \$ 22,523 | \$ 627,517 | \$ 1,493 | \$ 6,773 | \$ 2,630,743 | \$ 84,972 | | | | | | | |
| Transmission Plant | | | | | | | | | | | | | | | | | |
| Transmission Demand | TUP | PLTRB | NCPT | \$ 4,966,644 | \$ 172,988 | \$ 79,410 | \$ 8,642 | \$ 865 | \$ - | \$ - | | | | | | | |
| Distribution Poles | | | | | | | | | | | | | | | | | |
| Specific | TUP | PLDPS | NCPP | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Distribution Substation | | | | | | | | | | | | | | | | | |
| General | TUP | PLDSG | NCPP | \$ 2,012,327 | \$ 70,089 | \$ 32,174 | \$ 3,501 | \$ 351 | \$ - | \$ - | | | | | | | |
| Distribution Primary & Secondary Lines | | | | | | | | | | | | | | | | | |
| Primary Specific | TUP | PLDPLS | NCPP | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Primary Demand | TUP | PLDPLD | NCPP | 3,089,282 | 107,600 | 49,393 | 5,375 | 538 | - | - | | | | | | | |
| Primary Customer | TUP | PLDPLC | PCust08 | 12,333,143 | 21,818 | 135,516 | 1,355 | 13,552 | - | - | | | | | | | |
| Secondary Demand | TUP | PLDSL | SICD | 584,814 | 20,369 | 9,350 | 1,018 | 102 | - | - | | | | | | | |
| Secondary Customer | TUP | PLDSL | PCust07 | 3,620,607 | 6,405 | 39,783 | - | 3,978 | - | - | | | | | | | |
| Total Distribution Primary & Secondary Lines | | PLDLT | | \$ 19,627,847 | \$ 156,192 | \$ 234,042 | \$ 7,748 | \$ 18,170 | \$ - | \$ - | | | | | | | |
| Distribution Line Transformers | | | | | | | | | | | | | | | | | |
| Demand | TUP | PLDLTD | SICDT | \$ 653,850 | \$ 22,774 | \$ 10,454 | \$ 1,138 | \$ 114 | \$ - | \$ - | | | | | | | |
| Customer | TUP | PLDLTC | PCust09 | 1,436,616 | 2,541 | 15,785 | 158 | 1,579 | - | - | | | | | | | |
| Total Distribution Line Transformers | | PLDLTT | | \$ 2,090,466 | \$ 25,315 | \$ 26,240 | \$ 1,296 | \$ 1,692 | \$ - | \$ - | | | | | | | |
| Distribution Services | | | | | | | | | | | | | | | | | |
| Customer | TUP | PLDSC | C02 | \$ - | \$ - | \$ - | \$ 199 | \$ - | \$ - | \$ - | | | | | | | |
| Distribution Meters | | | | | | | | | | | | | | | | | |
| Customer | TUP | PLDMC | MGPA | \$ - | \$ 13,008 | \$ 80,795 | \$ 953 | \$ 183,388 | \$ - | \$ - | | | | | | | |
| Distribution Street & Customer Lighting | | | | | | | | | | | | | | | | | |
| Customer | TUP | PLDSCL | PCust04 | \$ 144,886,355 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | | | | | | | |
| Customer Accounts Expense | | | | | | | | | | | | | | | | | |
| Customer | TUP | PLCAE | PCust05 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | | | | | | | |
| Customer Service & Info. | | | | | | | | | | | | | | | | | |
| Customer | TUP | PLCSI | PCust06 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | | | | | | | |
| Sales Expense | | | | | | | | | | | | | | | | | |
| Customer | TUP | PLSEC | PCust06 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | | | | | | | |
| Total | | PLT | | \$ 174,230,296 | \$ 460,116 | \$ 1,080,178 | \$ 23,832 | \$ 211,239 | \$ 2,630,743 | \$ 84,972 | | | | | | | |

LOUISVILLE GAS AND ELECTRIC COMPANY
Cost of Service Study
Class Allocation

12 Months Ended
June 30, 2022

| Description | Ref | 1 Name | 2 Allocation Vector | 3 Total System | 4 Residential Rate RS | 5 General Service Rate GS | 6 Rate PS Primary | 7 Rate PS Secondary | 8 Rate TOD Primary | 9 Rate TOD Secondary | 10 Rate RTS Transmission | 11 Special Contract Customer |
|--|---------|-----------|------------------------|-------------------|--------------------------|------------------------------|----------------------|------------------------|-----------------------|-------------------------|-----------------------------|---------------------------------|
| | | | | | | | | | | | | |
| Net Utility Plant | | | | | | | | | | | | |
| Power Production Plant | | | | | | | | | | | | |
| Production Demand - LOLP | NTPLANT | UPPPLOLP | NPLLOLPA | \$ 2,495,383,413 | \$ 1,189,374,765 | \$ 280,705,913 | \$ 19,006,428 | \$ 314,311,316 | \$ 298,719,616 | \$ 245,608,030 | \$ 136,737,701 | \$ 7,518,447 |
| Production Energy | NTPLANT | UPPPEB | E01 | - | - | - | - | - | - | - | - | - |
| Total Power Production Plant | | UPPPT | | \$ 2,495,383,413 | \$ 1,189,374,765 | \$ 280,705,913 | \$ 19,006,428 | \$ 314,311,316 | \$ 298,719,616 | \$ 245,608,030 | \$ 136,737,701 | \$ 7,518,447 |
| Transmission Plant | | | | | | | | | | | | |
| Transmission Demand | NTPLANT | UPTRB | NCPT | \$ 422,249,551 | \$ 199,774,530 | \$ 48,798,564 | \$ 3,203,291 | \$ 54,297,755 | \$ 45,535,407 | \$ 43,110,172 | \$ 22,481,197 | \$ 1,444,657 |
| Distribution Poles | | | | | | | | | | | | |
| Specific | NTPLANT | UPDPS | NCPP | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Distribution Substation | | | | | | | | | | | | |
| General | NTPLANT | UPDSG | NCPP | \$ 158,088,627 | \$ 79,000,953 | \$ 19,297,421 | \$ 1,266,743 | \$ 21,472,079 | \$ 18,007,003 | \$ 17,047,943 | \$ - | \$ 571,291 |
| Distribution Primary & Secondary Lines | | | | | | | | | | | | |
| Primary Specific | NTPLANT | UPDPLS | NCPP | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Primary Demand | NTPLANT | UPDPLD | NCPP | 242,694,290 | 121,280,579 | 29,624,989 | 1,944,677 | 32,963,477 | 27,643,967 | 26,171,638 | - | 877,033 |
| Primary Customer | NTPLANT | UPDPLC | PCust08 | 397,151,933 | 344,214,691 | 41,328,701 | 63,818 | 2,537,231 | 120,343 | 460,403 | 11,852 | 1,823 |
| Secondary Demand | NTPLANT | UPDSL | SICD | 67,713,921 | 51,327,269 | 8,203,043 | - | 7,769,425 | - | - | - | - |
| Secondary Customer | NTPLANT | UPDSL | PCust07 | 115,706,517 | 101,050,166 | 12,132,754 | 18,735 | - | 35,329 | - | - | - |
| Total Distribution Primary & Secondary Lines | | UPDLT | | \$ 823,266,661 | \$ 617,872,706 | \$ 91,289,486 | \$ 2,027,230 | \$ 43,270,134 | \$ 27,799,639 | \$ 26,632,041 | \$ 11,852 | \$ 878,857 |
| Distribution Line Transformers | | | | | | | | | | | | |
| Demand | NTPLANT | UPDLTD | SICDT | \$ 82,953,368 | \$ 57,386,324 | \$ 9,171,391 | \$ - | \$ 8,686,587 | \$ - | \$ 7,245,988 | \$ - | \$ - |
| Customer | NTPLANT | UPDLTC | PCust09 | 46,238,863 | 40,095,558 | 4,814,139 | - | 295,547 | - | 53,630 | - | - |
| Total Distribution Line Transformers | | UPDLTT | | \$ 129,192,231 | \$ 97,481,882 | \$ 13,985,530 | \$ - | \$ 8,982,134 | \$ - | \$ 7,299,618 | \$ - | \$ - |
| Distribution Services | | | | | | | | | | | | |
| Customer | NTPLANT | UPDSC | C02 | \$ 29,563,787 | \$ 25,463,932 | \$ 3,626,678 | \$ - | \$ 373,036 | \$ - | \$ 100,007 | \$ - | \$ - |
| Distribution Meters | | | | | | | | | | | | |
| Customer | NTPLANT | UPDMC | MNPA | \$ 30,149,962 | \$ 20,513,748 | \$ 6,373,699 | \$ 208,332 | \$ 1,782,389 | \$ 416,122 | \$ 352,367 | \$ 294,071 | \$ 6,324 |
| Distribution Street & Customer Lighting | | | | | | | | | | | | |
| Customer | NTPLANT | UPDSCL | PCust04 | \$ 97,473,132 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Customer Accounts Expense | | | | | | | | | | | | |
| Customer | NTPLANT | UPCAE | PCust05 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Customer Service & Info. | | | | | | | | | | | | |
| Customer | NTPLANT | UPCSI | PCust06 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Sales Expense | | | | | | | | | | | | |
| Customer | NTPLANT | UPSEC | PCust06 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Total | | UPT | | \$ 4,185,367,364 | \$ 2,229,482,516 | \$ 464,077,292 | \$ 25,712,025 | \$ 444,488,843 | \$ 390,477,788 | \$ 340,150,178 | \$ 159,524,821 | \$ 10,419,576 |

LOUISVILLE GAS AND ELECTRIC COMPANY
 Cost of Service Study
 Class Allocation

12 Months Ended
 June 30, 2022

| Description | Ref | 1 Name | 2 Allocation Vector | 12 | | 13 | | 14 | | 15 | | 16 | | 17 | | 18 | |
|--|---------|-----------|---------------------------|---------------------------------|----------------------------|-------------------------------------|--|---|-------------------------|---------------------------|---|----|---|----|---|----|---|
| | | | | Street Lighting Rate RLS, LS | Street Lighting Rate LE | Traffic Street Lighting Rate TLE | Outdoor Sports Lighting Rate OSL | Electric Vehicle Charging Rate EV | Solar Share Rate SSP | Business Solar Rate BS | | | | | | | |
| Net Utility Plant | | | | | | | | | | | | | | | | | |
| Power Production Plant | | | | | | | | | | | | | | | | | |
| Production Demand - LOLP | NTPLANT | UPPPLOLP | NPLOLPDA | \$ 417,308 | \$ 14,535 | \$ 404,956 | \$ 963 | \$ 4,371 | \$ 2,486,734 | \$ 72,329 | | | | | | | |
| Production Energy | NTPLANT | UPPPEB | E01 | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| Total Power Production Plant | | UPPPT | | \$ 417,308 | \$ 14,535 | \$ 404,956 | \$ 963 | \$ 4,371 | \$ 2,486,734 | \$ 72,329 | | | | | | | |
| Transmission Plant | | | | | | | | | | | | | | | | | |
| Transmission Demand | NTPLANT | UPTRB | NCPT | \$ 3,423,449 | \$ 119,239 | \$ 54,736 | \$ 5,957 | \$ 596 | \$ - | \$ - | | | | | | | |
| Distribution Poles | | | | | | | | | | | | | | | | | |
| Specific | NTPLANT | UPDPS | NCPP | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | | | | | | | |
| Distribution Substation | | | | | | | | | | | | | | | | | |
| General | NTPLANT | UPDSG | NCPP | \$ 1,353,805 | \$ 47,153 | \$ 21,645 | \$ 2,356 | \$ 236 | \$ - | \$ - | | | | | | | |
| Distribution Primary & Secondary Lines | | | | | | | | | | | | | | | | | |
| Primary Specific | NTPLANT | UPDPLS | NCPP | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | | | | | | | |
| Primary Demand | NTPLANT | UPDPLD | NCPP | 2,078,332 | 72,388 | 33,230 | 3,616 | 362 | - | - | | | | | | | |
| Primary Customer | NTPLANT | UPDPLC | PCust08 | 8,297,193 | 14,678 | 91,169 | 912 | 9,117 | - | - | | | | | | | |
| Secondary Demand | NTPLANT | UPDSLDC | SICD | 393,437 | 13,703 | 6,291 | 685 | 69 | - | - | | | | | | | |
| Secondary Customer | NTPLANT | UPDSLDC | PCust07 | 2,435,784 | 4,309 | 26,764 | - | 2,676 | - | - | | | | | | | |
| Total Distribution Primary & Secondary Lines | | UPDLT | | \$ 13,204,747 | \$ 105,079 | \$ 157,453 | \$ 5,213 | \$ 12,224 | \$ - | \$ - | | | | | | | |
| Distribution Line Transformers | | | | | | | | | | | | | | | | | |
| Demand | NTPLANT | UPDLTD | SICDT | \$ 439,882 | \$ 15,321 | \$ 7,033 | \$ 765 | \$ 77 | \$ - | \$ - | | | | | | | |
| Customer | NTPLANT | UPDLTC | PCust09 | 966,492 | 1,710 | 10,620 | 106 | 1,062 | - | - | | | | | | | |
| Total Distribution Line Transformers | | UPDLTT | | \$ 1,406,373 | \$ 17,031 | \$ 17,653 | \$ 872 | \$ 1,139 | \$ - | \$ - | | | | | | | |
| Distribution Services | | | | | | | | | | | | | | | | | |
| Customer | NTPLANT | UPDSC | C02 | \$ - | \$ - | \$ - | \$ 134 | \$ - | \$ - | \$ - | | | | | | | |
| Distribution Meters | | | | | | | | | | | | | | | | | |
| Customer | NTPLANT | UPDMC | MNPA | \$ - | \$ 8,747 | \$ 54,327 | \$ 641 | \$ 139,194 | \$ - | \$ - | | | | | | | |
| Distribution Street & Customer Lighting | | | | | | | | | | | | | | | | | |
| Customer | NTPLANT | UPDSCL | PCust04 | \$ 97,473,132 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | | | | | | | |
| Customer Accounts Expense | | | | | | | | | | | | | | | | | |
| Customer | NTPLANT | UPCAE | PCust05 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | | | | | | | |
| Customer Service & Info. | | | | | | | | | | | | | | | | | |
| Customer | NTPLANT | UPCSI | PCust06 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | | | | | | | |
| Sales Expense | | | | | | | | | | | | | | | | | |
| Customer | NTPLANT | UPSEC | PCust06 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | | | | | | | |
| Total | | UPT | | \$ 117,278,814 | \$ 311,783 | \$ 710,771 | \$ 16,135 | \$ 157,760 | \$ 2,486,734 | \$ 72,329 | | | | | | | |

LOUISVILLE GAS AND ELECTRIC COMPANY
Cost of Service Study
Class Allocation

12 Months Ended
June 30, 2022

| Description | Ref | 1 Name | 2 Allocation Vector | 3 Total System | 4 Residential Rate RS | 5 General Service Rate GS | 6 Rate PS Primary | 7 Rate PS Secondary | 8 Rate TOD Primary | 9 Rate TOD Secondary | 10 Rate RTS Transmission | 11 Special Contract Customer |
|--|-----|-----------|------------------------|-------------------|--------------------------|------------------------------|----------------------|------------------------|-----------------------|-------------------------|-----------------------------|---------------------------------|
| | | | | | | | | | | | | |
| Net Cost Rate Base | | | | | | | | | | | | |
| Power Production Plant | | | | | | | | | | | | |
| Production Demand - LOLP | RB | RBPLOLP | RBLLOPDA | \$ 2,009,588,145 | \$ 957,680,114 | \$ 226,023,352 | \$ 15,303,905 | \$ 253,082,297 | \$ 240,527,918 | \$ 197,762,668 | \$ 110,100,685 | \$ 6,053,825 |
| Production Energy | RB | RBPPEB | E01 | 78,365,699 | 28,168,165 | 8,327,707 | 705,537 | 10,496,681 | 13,568,786 | 8,961,061 | 7,018,768 | 383,711 |
| Total Power Production Plant | | RBPPT | | \$ 2,087,953,844 | \$ 985,848,280 | \$ 234,351,059 | \$ 16,009,441 | \$ 263,578,977 | \$ 254,096,704 | \$ 206,723,729 | \$ 117,119,453 | \$ 6,437,537 |
| Transmission Plant | | | | | | | | | | | | |
| Transmission Demand | RB | RBTRB | NCPT | \$ 346,878,037 | \$ 164,114,791 | \$ 40,088,024 | \$ 2,631,504 | \$ 44,605,610 | \$ 37,407,341 | \$ 35,415,010 | \$ 18,468,305 | \$ 1,186,786 |
| Distribution Poles | | | | | | | | | | | | |
| Specific | RB | RBDPS | NCPP | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Distribution Substation | | | | | | | | | | | | |
| General | RB | RBD SG | NCPP | \$ 127,246,319 | \$ 63,588,259 | \$ 15,532,589 | \$ 1,019,608 | \$ 17,282,982 | \$ 14,493,926 | \$ 13,721,973 | \$ - | \$ 459,835 |
| Distribution Primary & Secondary Lines | | | | | | | | | | | | |
| Primary Specific | RB | RBDPLS | NCPP | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Primary Demand | RB | RBDPLD | NCPP | 194,814,177 | 97,353,655 | 23,780,402 | 1,561,020 | 26,460,255 | 22,190,208 | 21,008,348 | - | 704,007 |
| Primary Customer | RB | RBDPLC | PCust08 | 318,901,474 | 276,394,405 | 33,185,747 | 51,244 | 2,037,323 | 96,632 | 369,690 | 9,517 | 1,464 |
| Secondary Demand | RB | RBDSLD | SICD | 54,455,747 | 41,277,550 | 6,596,912 | - | 6,248,196 | - | - | - | - |
| Secondary Customer | RB | RBDSLC | PCust07 | 93,072,232 | 81,282,928 | 9,759,368 | 15,070 | - | 28,418 | - | - | - |
| Total Distribution Primary & Secondary Lines | | RBDLT | | \$ 661,243,630 | \$ 496,308,539 | \$ 73,322,430 | \$ 1,627,334 | \$ 34,745,774 | \$ 22,315,258 | \$ 21,378,038 | \$ 9,517 | \$ 705,471 |
| Distribution Line Transformers | | | | | | | | | | | | |
| Demand | RB | RBDLTD | SICDT | \$ 66,122,625 | \$ 45,742,982 | \$ 7,310,571 | \$ - | \$ 6,924,130 | \$ - | \$ 5,775,820 | \$ - | \$ - |
| Customer | RB | RBDLTC | PCust09 | 36,857,274 | 31,960,409 | 3,837,379 | - | 235,582 | - | 42,749 | - | - |
| Total Distribution Line Transformers | | RBDLTT | | \$ 102,979,899 | \$ 77,703,391 | \$ 11,147,950 | \$ - | \$ 7,159,713 | \$ - | \$ 5,818,569 | \$ - | \$ - |
| Distribution Services | | | | | | | | | | | | |
| Customer | RB | RBDSC | C02 | \$ 23,551,954 | \$ 20,285,809 | \$ 2,889,189 | \$ - | \$ 297,179 | \$ - | \$ 79,670 | \$ - | \$ - |
| Distribution Meters | | | | | | | | | | | | |
| Customer | RB | RBDMC | MRBA | \$ 26,834,745 | \$ 18,270,840 | \$ 5,676,819 | \$ 185,554 | \$ 1,587,509 | \$ 370,625 | \$ 313,841 | \$ 261,918 | \$ 5,633 |
| Distribution Street & Customer Lighting | | | | | | | | | | | | |
| Customer | RB | RBD SCL | PCust04 | \$ 77,771,357 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Customer Accounts Expense | | | | | | | | | | | | |
| Customer | RB | RBCAE | PCust05 | \$ 4,604,270 | \$ 3,422,078 | \$ 821,755 | \$ 3,172 | \$ 126,122 | \$ 29,910 | \$ 114,430 | \$ 2,946 | \$ 91 |
| Customer Service & Info. | | | | | | | | | | | | |
| Customer | RB | RBCSI | PCust06 | \$ 1,013,761 | \$ 878,634 | \$ 105,495 | \$ 163 | \$ 6,476 | \$ 307 | \$ 1,175 | \$ 30 | \$ 5 |
| Sales Expense | | | | | | | | | | | | |
| Customer | RB | RBSEC | PCust06 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Total | | RBT | | \$ 3,460,077,816 | \$ 1,830,420,621 | \$ 383,935,310 | \$ 21,476,777 | \$ 369,390,342 | \$ 328,714,071 | \$ 283,566,435 | \$ 135,862,169 | \$ 8,795,357 |

LOUISVILLE GAS AND ELECTRIC COMPANY
 Cost of Service Study
 Class Allocation

12 Months Ended
 June 30, 2022

| Description | Ref | 1 | 2 | 12 | 13 | 14 | 15 | 16 | 17 | 18 |
|--|-----|---------|-------------------|------------------------------|-------------------------|----------------------------------|----------------------------------|-----------------------------------|----------------------|------------------------|
| | | Name | Allocation Vector | Street Lighting Rate RLS, LS | Street Lighting Rate LE | Traffic Street Lighting Rate TLE | Outdoor Sports Lighting Rate OSL | Electric Vehicle Charging Rate EV | Solar Share Rate SSP | Business Solar Rate BS |
| Net Cost Rate Base | | | | | | | | | | |
| Power Production Plant | | | | | | | | | | |
| Production Demand - LOLP | RB | RBPLOLP | RBLLOLPA | \$ 336,015 | \$ 11,703 | \$ 326,069 | \$ 776 | \$ 3,520 | \$ 2,314,622 | \$ 60,677 |
| Production Energy | RB | RBPPEB | E01 | 688,717 | 23,988 | 22,371 | 80 | 127 | - | - |
| Total Power Production Plant | | RBPPT | | \$ 1,024,731 | \$ 35,691 | \$ 348,440 | \$ 856 | \$ 3,646 | \$ 2,314,622 | \$ 60,677 |
| Transmission Plant | | | | | | | | | | |
| Transmission Demand | RB | RBTRB | NCPT | \$ 2,812,363 | \$ 97,955 | \$ 44,966 | \$ 4,893 | \$ 490 | \$ - | \$ - |
| Distribution Poles | | | | | | | | | | |
| Specific | RB | RBDPS | NCPP | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Distribution Substation | | | | | | | | | | |
| General | RB | RBD SG | NCPP | \$ 1,089,684 | \$ 37,954 | \$ 17,423 | \$ 1,896 | \$ 190 | \$ - | \$ - |
| Distribution Primary & Secondary Lines | | | | | | | | | | |
| Primary Specific | RB | RBDPLS | NCPP | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Primary Demand | RB | RBDPLD | NCPP | 1,668,307 | 58,107 | 26,674 | 2,903 | 291 | - | - |
| Primary Customer | RB | RBDPLC | PCust08 | 6,662,406 | 11,786 | 73,206 | 732 | 7,321 | - | - |
| Secondary Demand | RB | RBDSLD | SICD | 316,403 | 11,020 | 5,059 | 551 | 55 | - | - |
| Secondary Customer | RB | RBDSLC | PCust07 | 1,959,301 | 3,466 | 21,529 | - | 2,153 | - | - |
| Total Distribution Primary & Secondary Lines | | RBDLT | | \$ 10,606,417 | \$ 84,380 | \$ 126,467 | \$ 4,185 | \$ 9,819 | \$ - | \$ - |
| Distribution Line Transformers | | | | | | | | | | |
| Demand | RB | RBDLTD | SICDT | \$ 350,632 | \$ 12,213 | \$ 5,606 | \$ 610 | \$ 61 | \$ - | \$ - |
| Customer | RB | RBDLTC | PCust09 | 770,396 | 1,363 | 8,465 | 85 | 847 | - | - |
| Total Distribution Line Transformers | | RBDLTT | | \$ 1,121,028 | \$ 13,575 | \$ 14,071 | \$ 695 | \$ 908 | \$ - | \$ - |
| Distribution Services | | | | | | | | | | |
| Customer | RB | RBDSC | C02 | \$ - | \$ - | \$ - | \$ 107 | \$ - | \$ - | \$ - |
| Distribution Meters | | | | | | | | | | |
| Customer | RB | RBDMC | MRBA | \$ - | \$ 7,790 | \$ 48,387 | \$ 571 | \$ 105,259 | \$ - | \$ - |
| Distribution Street & Customer Lighting | | | | | | | | | | |
| Customer | RB | RBD SCL | PCust04 | \$ 77,771,357 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Customer Accounts Expense | | | | | | | | | | |
| Customer | RB | RBCAE | PCust05 | \$ 82,488 | \$ 146 | \$ 906 | \$ 45 | \$ 181 | \$ - | \$ - |
| Customer Service & Info. | | | | | | | | | | |
| Customer | RB | RBCSI | PCust06 | \$ 21,179 | \$ 37 | \$ 233 | \$ 2 | \$ 23 | \$ - | \$ - |
| Sales Expense | | | | | | | | | | |
| Customer | RB | RBSEC | PCust06 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Total | | RBT | | \$ 94,529,248 | \$ 277,529 | \$ 600,893 | \$ 13,251 | \$ 120,516 | \$ 2,314,622 | \$ 60,677 |

LOUISVILLE GAS AND ELECTRIC COMPANY
 Cost of Service Study
 Class Allocation

12 Months Ended
 June 30, 2022

| Description | Ref | 1 Name | 2 Allocation Vector | 3 Total System | 4 Residential Rate RS | 5 General Service Rate GS | 6 Rate PS Primary | 7 Rate PS Secondary | 8 Rate TOD Primary | 9 Rate TOD Secondary | 10 Rate RTS Transmission | 11 Special Contract Customer |
|--|-----|-----------|---------------------------|----------------------|-----------------------------|---------------------------------|-------------------------|---------------------------|--------------------------|----------------------------|--------------------------------|------------------------------------|
| | | | | | | | | | | | | |
| Operation and Maintenance Expenses | | | | | | | | | | | | |
| Power Production Plant | | | | | | | | | | | | |
| Production Demand - LOLP | TOM | OMPPLLOLP | POMLOLPDA | \$ 111,958,098 | \$ 53,383,070 | \$ 12,599,009 | \$ 853,071 | \$ 14,107,331 | \$ 13,407,524 | \$ 11,023,700 | \$ 6,137,240 | \$ 337,453 |
| Production Energy | TOM | OMPPEB | E01 | 397,495,519 | 142,877,811 | 42,240,755 | 3,578,705 | 53,242,471 | 68,825,160 | 45,453,324 | 35,601,403 | 1,946,305 |
| Total Power Production Plant | | OMPPT | | \$ 509,453,617 | \$ 196,260,881 | \$ 54,839,764 | \$ 4,431,776 | \$ 67,349,802 | \$ 82,232,684 | \$ 56,477,024 | \$ 41,738,643 | \$ 2,283,758 |
| Transmission Plant | | | | | | | | | | | | |
| Transmission Demand | TOM | OMTRB | NCPT | \$ 34,465,993 | \$ 16,306,536 | \$ 3,983,168 | \$ 261,468 | \$ 4,432,038 | \$ 3,716,814 | \$ 3,518,855 | \$ 1,835,021 | \$ 117,920 |
| Distribution Poles | | | | | | | | | | | | |
| Specific | TOM | OMDPS | NCPP | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Distribution Substation | | | | | | | | | | | | |
| General | TOM | OMDSG | NCPP | \$ 8,074,379 | \$ 4,034,975 | \$ 985,616 | \$ 64,699 | \$ 1,096,687 | \$ 919,708 | \$ 870,724 | \$ - | \$ 29,179 |
| Distribution Primary & Secondary Lines | | | | | | | | | | | | |
| Primary Specific | TOM | OMDPLS | NCPP | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Primary Demand | TOM | OMDPLD | NCPP | 13,200,175 | 6,596,467 | 1,611,307 | 105,771 | 1,792,888 | 1,503,559 | 1,423,479 | - | 47,702 |
| Primary Customer | TOM | OMDPLC | Cust08 | 22,092,724 | 19,102,731 | 2,294,729 | 3,541 | 140,762 | 6,657 | 25,548 | - | 101 |
| Secondary Demand | TOM | OMDSL D | SICD | 4,169,129 | 3,160,207 | 505,059 | - | 478,362 | - | - | - | - |
| Secondary Customer | TOM | OMDSL C | Cust07 | 7,223,791 | 6,296,483 | 756,370 | - | - | - | - | - | - |
| Total Distribution Primary & Secondary Lines | | OMDLT | | \$ 46,685,818 | \$ 35,155,888 | \$ 5,167,465 | \$ 109,313 | \$ 2,412,011 | \$ 1,510,216 | \$ 1,449,027 | \$ - | \$ 47,803 |
| Distribution Line Transformers | | | | | | | | | | | | |
| Demand | TOM | OMDLTD | SICDT | \$ 1,117,029 | \$ 772,750 | \$ 123,500 | \$ - | \$ 116,971 | \$ - | \$ 97,573 | \$ - | \$ - |
| Customer | TOM | OMDLTC | Cust09 | 622,641 | 538,625 | 64,703 | - | 3,969 | - | 720 | - | - |
| Total Distribution Line Transformers | | OMDLTT | | \$ 1,739,670 | \$ 1,311,375 | \$ 188,202 | \$ - | \$ 120,940 | \$ - | \$ 98,293 | \$ - | \$ - |
| Distribution Services | | | | | | | | | | | | |
| Customer | TOM | OMDSC | C02 | \$ 332,913 | \$ 286,745 | \$ 40,839 | \$ - | \$ 4,201 | \$ - | \$ 1,126 | \$ - | \$ - |
| Distribution Meters | | | | | | | | | | | | |
| Customer | TOM | OMDMC | MOMA | \$ 13,918,315 | \$ 9,513,812 | \$ 2,955,978 | \$ 96,620 | \$ 826,632 | \$ 192,988 | \$ 163,420 | \$ 136,384 | \$ 2,933 |
| Distribution Street & Customer Lighting | | | | | | | | | | | | |
| Customer | TOM | OMDSCL | C04 | \$ 1,673,935 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Customer Accounts Expense | | | | | | | | | | | | |
| Customer | TOM | OMCAE | C05 | \$ 22,203,328 | \$ 16,468,323 | \$ 3,956,538 | \$ 15,265 | \$ 606,747 | \$ 143,482 | \$ 550,624 | \$ 14,174 | \$ 436 |
| Customer Service & Info. | | | | | | | | | | | | |
| Customer | TOM | OMCSI | C10 | \$ 4,888,693 | \$ 4,197,542 | \$ 504,233 | \$ 778 | \$ 30,930 | \$ 1,463 | \$ 5,614 | \$ 145 | \$ 22 |
| Sales Expense | | | | | | | | | | | | |
| Customer | TOM | OMSEC | C06 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Total | | OMT | | \$ 643,436,661 | \$ 283,536,077 | \$ 72,621,803 | \$ 4,979,918 | \$ 76,879,988 | \$ 88,717,355 | \$ 63,134,706 | \$ 43,724,366 | \$ 2,482,051 |

LOUISVILLE GAS AND ELECTRIC COMPANY
Cost of Service Study
Class Allocation

12 Months Ended
June 30, 2022

| Description | Ref | 1 Name | 2 Allocation Vector | 12 | | 13 | | 14 | | 15 | | 16 | | 17 | | 18 | |
|--|-----|-----------|------------------------|------------------------------|-------------------------|----------------------------------|----------------------------------|-----------------------------------|----------------------|------------------------|--|----|--|----|--|----|--------|
| | | | | Street Lighting Rate RLS, LS | Street Lighting Rate LE | Traffic Street Lighting Rate TLE | Outdoor Sports Lighting Rate OSL | Electric Vehicle Charging Rate EV | Solar Share Rate SSP | Business Solar Rate BS | | | | | | | |
| Operation and Maintenance Expenses | | | | | | | | | | | | | | | | | |
| Power Production Plant | | | | | | | | | | | | | | | | | |
| Production Demand - LOLP | TOM | OMPPLLOLP | POMLOLPDA | \$ 18,730 | \$ 652 | \$ 18,176 | \$ 43 | \$ 196 | \$ 71,903 | \$ - | | | | | | | |
| Production Energy | TOM | OMPPEB | E01 | 3,493,388 | 121,675 | 113,470 | 408 | 644 | - | - | | | | | | | |
| Total Power Production Plant | | OMPPT | | \$ 3,512,118 | \$ 122,327 | \$ 131,646 | \$ 451 | \$ 840 | \$ 71,903 | \$ - | | | | | | | |
| Transmission Plant | | | | | | | | | | | | | | | | | |
| Transmission Demand | TOM | OMTRB | NCPT | \$ 279,438 | \$ 9,733 | \$ 4,468 | \$ 486 | \$ 49 | \$ - | \$ - | | | | | | | |
| Distribution Poles | | | | | | | | | | | | | | | | | |
| Specific | TOM | OMDPS | NCPP | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | | | | | | | |
| Distribution Substation | | | | | | | | | | | | | | | | | |
| General | TOM | OMDSG | NCPP | \$ 69,146 | \$ 2,408 | \$ 1,106 | \$ 120 | \$ 12 | \$ - | \$ - | | | | | | | |
| Distribution Primary & Secondary Lines | | | | | | | | | | | | | | | | | |
| Primary Specific | TOM | OMDPLS | NCPP | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | | | | | | | |
| Primary Demand | TOM | OMDPLD | NCPP | 113,041 | 3,937 | 1,807 | 197 | 20 | - | - | | | | | | | |
| Primary Customer | TOM | OMDPLC | Cust08 | 511,572 | 905 | 5,621 | 51 | 506 | - | - | | | | | | | |
| Secondary Demand | TOM | OMDSL | SICD | 24,224 | 844 | 387 | 42 | 4 | - | - | | | | | | | |
| Secondary Customer | TOM | OMDSL | Cust07 | 168,620 | 298 | 1,853 | - | 167 | - | - | | | | | | | |
| Total Distribution Primary & Secondary Lines | | OMDLT | | \$ 817,457 | \$ 5,984 | \$ 9,669 | \$ 289 | \$ 697 | \$ - | \$ - | | | | | | | |
| Distribution Line Transformers | | | | | | | | | | | | | | | | | |
| Demand | TOM | OMDLTD | SICDT | \$ 5,923 | \$ 206 | \$ 95 | \$ 10 | \$ 1 | \$ - | \$ - | | | | | | | |
| Customer | TOM | OMDLTC | Cust09 | 14,424 | 26 | 158 | 1 | 14 | - | - | | | | | | | |
| Total Distribution Line Transformers | | OMDLTT | | \$ 20,348 | \$ 232 | \$ 253 | \$ 12 | \$ 15 | \$ - | \$ - | | | | | | | |
| Distribution Services | | | | | | | | | | | | | | | | | |
| Customer | TOM | OMDSC | C02 | \$ - | \$ - | \$ - | \$ 2 | \$ - | \$ - | \$ - | | | | | | | |
| Distribution Meters | | | | | | | | | | | | | | | | | |
| Customer | TOM | OMDMC | MOMA | \$ - | \$ 4,056 | \$ 25,196 | \$ 297 | \$ - | \$ - | \$ - | | | | | | | |
| Distribution Street & Customer Lighting | | | | | | | | | | | | | | | | | |
| Customer | TOM | OMDSCL | C04 | \$ 1,673,935 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | | | | | | | |
| Customer Accounts Expense | | | | | | | | | | | | | | | | | |
| Customer | TOM | OMCAE | C05 | \$ 441,022 | \$ 780 | \$ 4,846 | \$ 218 | \$ 872 | \$ - | \$ - | | | | | | | |
| Customer Service & Info. | | | | | | | | | | | | | | | | | |
| Customer | TOM | OMCSI | C10 | \$ 112,410 | \$ 199 | \$ 1,235 | \$ 11 | \$ 24,111 | \$ - | \$ - | | | | | | | 10,000 |
| Sales Expense | | | | | | | | | | | | | | | | | |
| Customer | TOM | OMSEC | C06 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | | | | | | | |
| Total | | OMT | | \$ 6,925,874 | \$ 145,720 | \$ 178,418 | \$ 1,886 | \$ 26,596 | \$ 71,903 | \$ 10,000 | | | | | | | |

LOUISVILLE GAS AND ELECTRIC COMPANY
Cost of Service Study
Class Allocation

12 Months Ended
June 30, 2022

| Description | Ref | 1 Name | 2 Allocation Vector | 3 Total System | 4 Residential Rate RS | 5 General Service Rate GS | 6 Rate PS Primary | 7 Rate PS Secondary | 8 Rate TOD Primary | 9 Rate TOD Secondary | 10 Rate RTS Transmission | 11 Special Contract Customer |
|--|-----|-----------|------------------------|-------------------|--------------------------|------------------------------|----------------------|------------------------|-----------------------|-------------------------|-----------------------------|---------------------------------|
| | | | | | | | | | | | | |
| Labor Expenses | | | | | | | | | | | | |
| Power Production Plant | | | | | | | | | | | | |
| Production Demand - LOLP | TLB | LBPPLP | LOLP | \$ 24,034,852 | \$ 11,467,493 | \$ 2,706,458 | \$ 183,253 | \$ 3,030,469 | \$ 2,880,139 | \$ 2,368,058 | \$ 1,318,372 | \$ 72,490 |
| Production Energy | TLB | LBPPPE | E01 | 20,124,090 | 7,233,505 | 2,138,532 | 181,180 | 2,695,518 | 3,484,426 | 2,301,175 | 1,802,400 | 98,536 |
| Total Power Production Plant | | LBPPT | | \$ 44,158,942 | \$ 18,700,998 | \$ 4,844,990 | \$ 364,433 | \$ 5,725,986 | \$ 6,364,565 | \$ 4,669,233 | \$ 3,120,772 | \$ 171,026 |
| Transmission Plant | | | | | | | | | | | | |
| Transmission Demand | TLB | LBTRB | NCPT | \$ 5,515,515 | \$ 2,609,498 | \$ 637,417 | \$ 41,842 | \$ 709,249 | \$ 594,793 | \$ 563,114 | \$ 293,654 | \$ 18,870 |
| Distribution Poles | | | | | | | | | | | | |
| Specific | TLB | LBDPS | NCPP | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Distribution Substation | | | | | | | | | | | | |
| General | TLB | LBDSC | NCPP | \$ 2,294,469 | \$ 1,146,605 | \$ 280,079 | \$ 18,385 | \$ 311,642 | \$ 261,350 | \$ 247,431 | \$ - | \$ 8,292 |
| Distribution Primary & Secondary Lines | | | | | | | | | | | | |
| Primary Specific | TLB | LBDPLS | NCPP | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Primary Demand | TLB | LBDPLD | NCPP | 2,285,841 | 1,142,293 | 279,026 | 18,316 | 310,470 | 260,368 | 246,500 | - | 8,260 |
| Primary Customer | TLB | LBDPLC | Cust08 | 3,861,146 | 3,338,585 | 401,050 | 619 | 24,601 | 1,164 | 4,465 | - | 18 |
| Secondary Demand | TLB | LBDSLD | SICD | 756,973 | 573,787 | 91,702 | - | 86,854 | - | - | - | - |
| Secondary Customer | TLB | LBDSLC | Cust07 | 1,317,944 | 1,148,762 | 137,996 | - | - | - | - | - | - |
| Total Distribution Primary & Secondary Lines | | LBDLT | | \$ 8,221,904 | \$ 6,203,427 | \$ 909,773 | \$ 18,935 | \$ 421,925 | \$ 261,531 | \$ 250,965 | \$ - | \$ 8,278 |
| Distribution Line Transformers | | | | | | | | | | | | |
| Demand | TLB | LBDLTD | SICDT | \$ 214,386 | \$ 148,310 | \$ 23,703 | \$ - | \$ 22,450 | \$ - | \$ 18,727 | \$ - | \$ - |
| Customer | TLB | LBDLTC | Cust09 | 119,501 | 103,376 | 12,418 | - | 762 | - | 138 | - | - |
| Total Distribution Line Transformers | | LBDLTT | | \$ 333,887 | \$ 251,686 | \$ 36,121 | \$ - | \$ 23,212 | \$ - | \$ 18,865 | \$ - | \$ - |
| Distribution Services | | | | | | | | | | | | |
| Customer | TLB | LBDSC | C02 | \$ 54,624 | \$ 47,049 | \$ 6,701 | \$ - | \$ 689 | \$ - | \$ 185 | \$ - | \$ - |
| Distribution Meters | | | | | | | | | | | | |
| Customer | TLB | LBDMC | C03 | \$ 4,648,098 | \$ 3,177,190 | \$ 987,165 | \$ 32,267 | \$ 276,058 | \$ 64,449 | \$ 54,575 | \$ 45,546 | \$ 980 |
| Distribution Street & Customer Lighting | | | | | | | | | | | | |
| Customer | TLB | LBDSC | C04 | \$ 187,932 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Customer Accounts Expense | | | | | | | | | | | | |
| Customer | TLB | LBCAE | C05 | \$ 6,530,471 | \$ 4,843,684 | \$ 1,163,702 | \$ 4,490 | \$ 178,457 | \$ 42,201 | \$ 161,950 | \$ 4,169 | \$ 128 |
| Customer Service & Info. | | | | | | | | | | | | |
| Customer | TLB | LBCSI | C05 | \$ 1,422,705 | \$ 1,055,228 | \$ 253,520 | \$ 978 | \$ 38,878 | \$ 9,194 | \$ 35,282 | \$ 908 | \$ 28 |
| Sales Expense | | | | | | | | | | | | |
| Customer | TLB | LBSEC | C06 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Total | | LBT | | \$ 73,368,547 | \$ 38,035,366 | \$ 9,119,468 | \$ 481,329 | \$ 7,686,097 | \$ 7,598,084 | \$ 6,001,600 | \$ 3,465,050 | \$ 207,602 |

LOUISVILLE GAS AND ELECTRIC COMPANY
Cost of Service Study
Class Allocation

12 Months Ended
June 30, 2022

| Description | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | |
|--|-------|----------|-------------------|----------------|---------------------|-------------------------|-----------------|-------------------|------------------|--------------------|-----------------------|---------------------------|
| Description | Ref | Name | Allocation Vector | Total System | Residential Rate RS | General Service Rate GS | Rate PS Primary | Rate PS Secondary | Rate TOD Primary | Rate TOD Secondary | Rate RTS Transmission | Special Contract Customer |
| Depreciation Expenses | | | | | | | | | | | | |
| Power Production Plant | | | | | | | | | | | | |
| Production Demand - LOLP | TDEPR | DEPPLOLP | PDEPLOLPDA | \$ 212,733,072 | \$ 101,457,547 | \$ 23,945,130 | \$ 1,621,310 | \$ 26,811,781 | \$ 25,481,758 | \$ 20,951,166 | \$ 11,664,172 | \$ 641,348 |
| Production Energy | TDEPR | DEPPEB | E01 | - | - | - | - | - | - | - | - | - |
| Total Power Production Plant | | DEPPT | | \$ 212,733,072 | \$ 101,457,547 | \$ 23,945,130 | \$ 1,621,310 | \$ 26,811,781 | \$ 25,481,758 | \$ 20,951,166 | \$ 11,664,172 | \$ 641,348 |
| Transmission Plant | | | | | | | | | | | | |
| Transmission Demand | TDEPR | DETRB | NCPT | \$ 14,573,795 | \$ 6,895,148 | \$ 1,684,265 | \$ 110,560 | \$ 1,874,068 | \$ 1,571,639 | \$ 1,487,932 | \$ 775,931 | \$ 49,862 |
| Distribution Poles | | | | | | | | | | | | |
| Specific | TDEPR | DEDPS | NCPP | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Distribution Substation | | | | | | | | | | | | |
| General | TDEPR | DEDSG | NCPP | \$ 6,212,136 | \$ 3,104,364 | \$ 758,297 | \$ 49,777 | \$ 843,751 | \$ 707,590 | \$ 669,904 | \$ - | \$ 22,449 |
| Distribution Primary & Secondary Lines | | | | | | | | | | | | |
| Primary Specific | TDEPR | DEDPLS | NCPP | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Primary Demand | TDEPR | DEDPLD | NCPP | 9,536,738 | 4,765,753 | 1,164,122 | 76,417 | 1,295,309 | 1,086,277 | 1,028,422 | - | 34,463 |
| Primary Customer | TDEPR | DEDPLC | Cust08 | 15,606,193 | 13,494,077 | 1,620,986 | 2,502 | 99,433 | 4,703 | 18,047 | - | 71 |
| Secondary Demand | TDEPR | DEDSL | SICD | 2,660,837 | 2,016,919 | 322,341 | - | 305,302 | - | - | - | - |
| Secondary Customer | TDEPR | DESLC | Cust07 | 4,546,719 | 3,963,063 | 476,066 | - | - | - | - | - | - |
| Total Distribution Primary & Secondary Lines | | DEDLT | | \$ 32,350,488 | \$ 24,239,813 | \$ 3,583,514 | \$ 78,918 | \$ 1,700,044 | \$ 1,090,980 | \$ 1,046,469 | \$ - | \$ 34,535 |
| Distribution Line Transformers | | | | | | | | | | | | |
| Demand | TDEPR | DEDLTD | SICDT | \$ 3,259,675 | \$ 2,255,011 | \$ 360,392 | \$ - | \$ 341,342 | \$ - | \$ 284,733 | \$ - | \$ - |
| Customer | TDEPR | DEDLTC | Cust09 | 1,816,969 | 1,571,796 | 188,813 | - | 11,582 | - | 2,102 | - | - |
| Total Distribution Line Transformers | | DEDLTT | | \$ 5,076,644 | \$ 3,826,807 | \$ 549,205 | \$ - | \$ 352,924 | \$ - | \$ 286,835 | \$ - | \$ - |
| Distribution Services | | | | | | | | | | | | |
| Customer | TDEPR | DEDESC | C02 | \$ 1,161,717 | \$ 1,000,612 | \$ 142,511 | \$ - | \$ 14,659 | \$ - | \$ 3,930 | \$ - | \$ - |
| Distribution Meters | | | | | | | | | | | | |
| Customer | TDEPR | DEDMC | MDT | \$ 1,184,751 | \$ 797,297 | \$ 247,723 | \$ 8,097 | \$ 69,275 | \$ 16,173 | \$ 13,695 | \$ 11,430 | \$ 246 |
| Distribution Street & Customer Lighting | | | | | | | | | | | | |
| Customer | TDEPR | DEDSCL | C04 | \$ 3,830,233 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Customer Accounts Expense | | | | | | | | | | | | |
| Customer | TDEPR | DECAE | C05 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Customer Service & Info. | | | | | | | | | | | | |
| Customer | TDEPR | DECSI | C05 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Sales Expense | | | | | | | | | | | | |
| Customer | TDEPR | DESEC | C06 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Total | | DET | | \$ 277,122,836 | \$ 141,321,587 | \$ 30,910,647 | \$ 1,868,663 | \$ 31,666,501 | \$ 28,868,139 | \$ 24,459,931 | \$ 12,451,532 | \$ 748,439 |

LOUISVILLE GAS AND ELECTRIC COMPANY
Cost of Service Study
Class Allocation

12 Months Ended
June 30, 2022

| Description | Ref | 1 Name | 2 Allocation Vector | 12 | | 13 | | 14 | | 15 | | 16 | | 17 | | 18 | |
|--|-------|-----------|------------------------|------------------------------|-------------------------|----------------------------------|----------------------------------|-----------------------------------|----------------------|------------------------|------|------|------|------|------|------|------|
| | | | | Street Lighting Rate RLS, LS | Street Lighting Rate LE | Traffic Street Lighting Rate TLE | Outdoor Sports Lighting Rate OSL | Electric Vehicle Charging Rate EV | Solar Share Rate SSP | Business Solar Rate BS | | | | | | | |
| Depreciation Expenses | | | | | | | | | | | | | | | | | |
| Power Production Plant | | | | | | | | | | | | | | | | | |
| Production Demand - LOLP | TDEPR | DEPPLOLP | PDEPLOLPDA | \$ 35,598 | \$ 1,240 | \$ 34,544 | \$ 82 | \$ 373 | \$ 83,870 | \$ 3,154 | | | | | | | |
| Production Energy | TDEPR | DEPPEB | E01 | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| Total Power Production Plant | | DEPPT | | \$ 35,598 | \$ 1,240 | \$ 34,544 | \$ 82 | \$ 373 | \$ 83,870 | \$ 3,154 | | | | | | | |
| Transmission Plant | | | | | | | | | | | | | | | | | |
| Transmission Demand | TDEPR | DETRB | NCPT | \$ 118,159 | \$ 4,115 | \$ 1,889 | \$ 206 | \$ 21 | \$ - | \$ - | | | | | | | |
| Distribution Poles | | | | | | | | | | | | | | | | | |
| Specific | TDEPR | DEDPS | NCPP | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Distribution Substation | | | | | | | | | | | | | | | | | |
| General | TDEPR | DEDSG | NCPP | \$ 53,198 | \$ 1,853 | \$ 851 | \$ 93 | \$ 9 | \$ - | \$ - | | | | | | | |
| Distribution Primary & Secondary Lines | | | | | | | | | | | | | | | | | |
| Primary Specific | TDEPR | DEDPLS | NCPP | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Primary Demand | TDEPR | DEDPLD | NCPP | 81,669 | 2,845 | 1,306 | 142 | 14 | - | - | | | | | | | |
| Primary Customer | TDEPR | DEDPLC | Cust08 | 361,372 | 639 | 3,971 | 36 | 357 | - | - | | | | | | | |
| Secondary Demand | TDEPR | DEDSL D | SICD | 15,460 | 538 | 247 | 27 | 3 | - | - | | | | | | | |
| Secondary Customer | TDEPR | DEDSL C | Cust07 | 106,131 | 188 | 1,166 | - | 105 | - | - | | | | | | | |
| Total Distribution Primary & Secondary Lines | | DEDLT | | \$ 564,632 | \$ 4,210 | \$ 6,690 | \$ 205 | \$ 479 | \$ - | \$ - | | | | | | | |
| Distribution Line Transformers | | | | | | | | | | | | | | | | | |
| Demand | TDEPR | DEDLTD | SICDT | \$ 17,285 | \$ 602 | \$ 276 | \$ 30 | \$ 3 | \$ - | \$ - | | | | | | | |
| Customer | TDEPR | DEDLTC | Cust09 | 42,093 | 74 | 463 | 4 | 42 | - | - | | | | | | | |
| Total Distribution Line Transformers | | DEDLTT | | \$ 59,378 | \$ 677 | \$ 739 | \$ 34 | \$ 45 | \$ - | \$ - | | | | | | | |
| Distribution Services | | | | | | | | | | | | | | | | | |
| Customer | TDEPR | DEDESC | C02 | \$ - | \$ - | \$ - | \$ 5 | \$ - | \$ - | \$ - | | | | | | | |
| Distribution Meters | | | | | | | | | | | | | | | | | |
| Customer | TDEPR | DEDMC | MDT | \$ - | \$ 340 | \$ 2,111 | \$ 25 | \$ 18,339 | \$ - | \$ - | | | | | | | |
| Distribution Street & Customer Lighting | | | | | | | | | | | | | | | | | |
| Customer | TDEPR | DEDSCL | C04 | \$ 3,830,233 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | | | | | | | |
| Customer Accounts Expense | | | | | | | | | | | | | | | | | |
| Customer | TDEPR | DECAE | C05 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | | | | | | | |
| Customer Service & Info. | | | | | | | | | | | | | | | | | |
| Customer | TDEPR | DECSI | C05 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | | | | | | | |
| Sales Expense | | | | | | | | | | | | | | | | | |
| Customer | TDEPR | DESEC | C06 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | | | | | | | |
| Total | | DET | | \$ 4,661,198 | \$ 12,435 | \$ 46,824 | \$ 649 | \$ 19,265 | \$ 83,870 | \$ 3,154 | | | | | | | |

LOUISVILLE GAS AND ELECTRIC COMPANY
Cost of Service Study
Class Allocation

12 Months Ended
June 30, 2022

| Description | Ref | 1 Name | 2 Allocation Vector | 3 Total System | 4 Residential Rate RS | 5 General Service Rate GS | 6 Rate PS Primary | 7 Rate PS Secondary | 8 Rate TOD Primary | 9 Rate TOD Secondary | 10 Rate RTS Transmission | 11 Special Contract Customer |
|--|------|-----------|------------------------|-------------------|--------------------------|------------------------------|----------------------|------------------------|-----------------------|-------------------------|-----------------------------|---------------------------------|
| | | | | | | | | | | | | |
| Property and Other Taxes | | | | | | | | | | | | |
| Power Production Plant | | | | | | | | | | | | |
| Production Demand - LOLP | PTAX | PTPLOLP | PPTLOLPDA | \$ 25,721,711 | \$ 12,270,751 | \$ 2,896,036 | \$ 196,089 | \$ 3,242,742 | \$ 3,081,883 | \$ 2,533,932 | \$ 1,410,720 | \$ 77,568 |
| Production Energy | PTAX | PTPPEB | E01 | - | - | - | - | - | - | - | - | - |
| Total Power Production Plant | | PTPPT | | \$ 25,721,711 | \$ 12,270,751 | \$ 2,896,036 | \$ 196,089 | \$ 3,242,742 | \$ 3,081,883 | \$ 2,533,932 | \$ 1,410,720 | \$ 77,568 |
| Transmission Plant | | | | | | | | | | | | |
| Transmission Demand | PTAX | PTTRB | NCPT | \$ 4,076,189 | \$ 1,928,525 | \$ 471,077 | \$ 30,923 | \$ 524,164 | \$ 439,576 | \$ 416,164 | \$ 217,022 | \$ 13,946 |
| Distribution Poles | | | | | | | | | | | | |
| Specific | PTAX | PTDPS | NCPP | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Distribution Substation | | | | | | | | | | | | |
| General | PTAX | PTDSG | NCPP | \$ 1,563,612 | \$ 781,377 | \$ 190,866 | \$ 12,529 | \$ 212,375 | \$ 178,102 | \$ 168,617 | \$ - | \$ 5,650 |
| Distribution Primary & Secondary Lines | | | | | | | | | | | | |
| Primary Specific | PTAX | PTDPLS | NCPP | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Primary Demand | PTAX | PTDPLD | NCPP | 2,400,424 | 1,199,554 | 293,013 | 19,234 | 326,033 | 273,419 | 258,857 | - | 8,675 |
| Primary Customer | PTAX | PTDPLC | Cust08 | 3,928,124 | 3,396,498 | 408,007 | 630 | 25,028 | 1,184 | 4,543 | - | 18 |
| Secondary Demand | PTAX | PTDSL | SICD | 669,740 | 507,664 | 81,134 | - | 76,845 | - | - | - | - |
| Secondary Customer | PTAX | PTDPLC | Cust07 | 1,144,422 | 997,514 | 119,827 | - | - | - | - | - | - |
| Total Distribution Primary & Secondary Lines | | PTDLT | | \$ 8,142,711 | \$ 6,101,230 | \$ 901,981 | \$ 19,864 | \$ 427,906 | \$ 274,603 | \$ 263,399 | \$ - | \$ 8,692 |
| Distribution Line Transformers | | | | | | | | | | | | |
| Demand | PTAX | PTDLTD | SICDT | \$ 820,470 | \$ 567,593 | \$ 90,712 | \$ - | \$ 85,917 | \$ - | \$ 71,668 | \$ - | \$ - |
| Customer | PTAX | PTDLTC | Cust09 | 457,336 | 395,626 | 47,525 | - | 2,915 | - | 529 | - | - |
| Total Distribution Line Transformers | | PTDLTT | | \$ 1,277,806 | \$ 963,218 | \$ 138,237 | \$ - | \$ 88,832 | \$ - | \$ 72,197 | \$ - | \$ - |
| Distribution Services | | | | | | | | | | | | |
| Customer | PTAX | PTDSC | C02 | \$ 292,408 | \$ 251,857 | \$ 35,871 | \$ - | \$ 3,690 | \$ - | \$ 989 | \$ - | \$ - |
| Distribution Meters | | | | | | | | | | | | |
| Customer | PTAX | PTDMC | MPTT | \$ 298,205 | \$ 201,999 | \$ 62,762 | \$ 2,051 | \$ 17,551 | \$ 4,098 | \$ 3,470 | \$ 2,896 | \$ 62 |
| Distribution Street & Customer Lighting | | | | | | | | | | | | |
| Customer | PTAX | PTDSCL | C04 | \$ 964,081 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Customer Accounts Expense | | | | | | | | | | | | |
| Customer | PTAX | PTCAE | C05 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Customer Service & Info. | | | | | | | | | | | | |
| Customer | PTAX | PTCSI | C05 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Sales Expense | | | | | | | | | | | | |
| Customer | PTAX | PTSEC | C06 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Total | | PTT | | \$ 42,336,722 | \$ 22,498,958 | \$ 4,696,829 | \$ 261,456 | \$ 4,517,259 | \$ 3,978,262 | \$ 3,458,769 | \$ 1,630,638 | \$ 105,919 |

LOUISVILLE GAS AND ELECTRIC COMPANY
 Cost of Service Study
 Class Allocation

12 Months Ended
 June 30, 2022

| Description | Ref | 1 Name | 2 Allocation Vector | 12 | | 13 | | 14 | | 15 | | 16 | | 17 | | 18 | |
|--|------|-----------|------------------------|------------------------------|-------------------------|----------------------------------|----------------------------------|-----------------------------------|----------------------|------------------------|---|----|---|----|---|----|---|
| | | | | Street Lighting Rate RLS, LS | Street Lighting Rate LE | Traffic Street Lighting Rate TLE | Outdoor Sports Lighting Rate OSL | Electric Vehicle Charging Rate EV | Solar Share Rate SSP | Business Solar Rate BS | | | | | | | |
| Property and Other Taxes | | | | | | | | | | | | | | | | | |
| Power Production Plant | | | | | | | | | | | | | | | | | |
| Production Demand - LOLP | PTAX | PTPLOLP | PPTLOLPDA | \$ 4,305 | \$ 150 | \$ 4,178 | \$ 10 | \$ 45 | \$ 3,190 | \$ 111 | | | | | | | |
| Production Energy | PTAX | PTPPEB | E01 | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| Total Power Production Plant | | PTPPT | | \$ 4,305 | \$ 150 | \$ 4,178 | \$ 10 | \$ 45 | \$ 3,190 | \$ 111 | | | | | | | |
| Transmission Plant | | | | | | | | | | | | | | | | | |
| Transmission Demand | PTAX | PTTRB | NCPT | \$ 33,048 | \$ 1,151 | \$ 528 | \$ 58 | \$ 6 | \$ - | \$ - | | | | | | | |
| Distribution Poles | | | | | | | | | | | | | | | | | |
| Specific | PTAX | PTDPS | NCPP | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | | | | | | | |
| Distribution Substation | | | | | | | | | | | | | | | | | |
| General | PTAX | PTDSG | NCPP | \$ 13,390 | \$ 466 | \$ 214 | \$ 23 | \$ 2 | \$ - | \$ - | | | | | | | |
| Distribution Primary & Secondary Lines | | | | | | | | | | | | | | | | | |
| Primary Specific | PTAX | PTDPLS | NCPP | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | | | | | | | |
| Primary Demand | PTAX | PTDPLD | NCPP | 20,556 | 716 | 329 | 36 | 4 | - | - | | | | | | | |
| Primary Customer | PTAX | PTDPLC | Cust08 | 90,958 | 161 | 999 | 9 | 90 | - | - | | | | | | | |
| Secondary Demand | PTAX | PTDSL D | SICD | 3,891 | 136 | 62 | 7 | 1 | - | - | | | | | | | |
| Secondary Customer | PTAX | PTDSL C | Cust07 | 26,713 | 47 | 294 | - | 26 | - | - | | | | | | | |
| Total Distribution Primary & Secondary Lines | | PTDLT | | \$ 142,119 | \$ 1,060 | \$ 1,684 | \$ 52 | \$ 121 | \$ - | \$ - | | | | | | | |
| Distribution Line Transformers | | | | | | | | | | | | | | | | | |
| Demand | PTAX | PTDLTD | SICDT | \$ 4,351 | \$ 152 | \$ 70 | \$ 8 | \$ 1 | \$ - | \$ - | | | | | | | |
| Customer | PTAX | PTDLTC | Cust09 | 10,595 | 19 | 116 | 1 | 10 | - | - | | | | | | | |
| Total Distribution Line Transformers | | PTDLTT | | \$ 14,946 | \$ 170 | \$ 186 | \$ 9 | \$ 11 | \$ - | \$ - | | | | | | | |
| Distribution Services | | | | | | | | | | | | | | | | | |
| Customer | PTAX | PTDSC | C02 | \$ - | \$ - | \$ - | \$ 1 | \$ - | \$ - | \$ - | | | | | | | |
| Distribution Meters | | | | | | | | | | | | | | | | | |
| Customer | PTAX | PTDMC | MPTT | \$ - | \$ 86 | \$ 535 | \$ 6 | \$ 2,689 | \$ - | \$ - | | | | | | | |
| Distribution Street & Customer Lighting | | | | | | | | | | | | | | | | | |
| Customer | PTAX | PTDSCL | C04 | \$ 964,081 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | | | | | | | |
| Customer Accounts Expense | | | | | | | | | | | | | | | | | |
| Customer | PTAX | PTCAE | C05 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | | | | | | | |
| Customer Service & Info. | | | | | | | | | | | | | | | | | |
| Customer | PTAX | PTCSI | C05 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | | | | | | | |
| Sales Expense | | | | | | | | | | | | | | | | | |
| Customer | PTAX | PTSEC | C06 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | | | | | | | |
| Total | | PTT | | \$ 1,171,890 | \$ 3,083 | \$ 7,325 | \$ 159 | \$ 2,875 | \$ 3,190 | \$ 111 | | | | | | | |

LOUISVILLE GAS AND ELECTRIC COMPANY
 Cost of Service Study
 Class Allocation

12 Months Ended
 June 30, 2022

| | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | |
|--|------|----------|-------------------|--------------|---------------------|-------------------------|-----------------|-------------------|------------------|--------------------|-----------------------|---------------------------|
| Description | Ref | Name | Allocation Vector | Total System | Residential Rate RS | General Service Rate GS | Rate PS Primary | Rate PS Secondary | Rate TOD Primary | Rate TOD Secondary | Rate RTS Transmission | Special Contract Customer |
| Amortization of ITC | | | | | | | | | | | | |
| Power Production Plant | | | | | | | | | | | | |
| Production Demand - LOLP | OTAX | OTPPLOLP | PITCLOLPDA | \$ (557,122) | \$ (259,073) | \$ (61,144) | \$ (4,140) | \$ (68,464) | \$ (65,068) | \$ (53,499) | \$ (29,785) | \$ (1,638) |
| Production Energy | OTAX | OTPPPEB | E01 | - | - | - | - | - | - | - | - | - |
| Total Power Production Plant | | OTPPPT | | \$ (557,122) | \$ (259,073) | \$ (61,144) | \$ (4,140) | \$ (68,464) | \$ (65,068) | \$ (53,499) | \$ (29,785) | \$ (1,638) |
| Transmission Plant | | | | | | | | | | | | |
| Transmission Demand | OTAX | OTTRB | NCPT | \$ (88,289) | \$ (41,771) | \$ (10,203) | \$ (670) | \$ (11,353) | \$ (9,521) | \$ (9,014) | \$ (4,701) | \$ (302) |
| Distribution Poles | | | | | | | | | | | | |
| Specific | OTAX | OTDPS | NCPP | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Distribution Substation | | | | | | | | | | | | |
| General | OTAX | OTDSG | NCPP | \$ (33,867) | \$ (16,924) | \$ (4,134) | \$ (271) | \$ (4,600) | \$ (3,858) | \$ (3,652) | \$ - | \$ (122) |
| Distribution Primary & Secondary Lines | | | | | | | | | | | | |
| Primary Specific | OTAX | OTDPLS | NCPP | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Primary Demand | OTAX | OTDPLD | NCPP | (51,992) | (25,982) | (6,347) | (417) | (7,062) | (5,922) | (5,607) | - | (188) |
| Primary Customer | OTAX | OTDPLC | Cust08 | (85,082) | (73,567) | (8,837) | (14) | (542) | (26) | (98) | - | (0) |
| Secondary Demand | OTAX | OTDSLDC | SICD | (14,506) | (10,996) | (1,757) | - | (1,664) | - | - | - | - |
| Secondary Customer | OTAX | OTDSLCC | Cust07 | (24,788) | (21,606) | (2,595) | - | - | - | - | - | - |
| Total Distribution Primary & Secondary Lines | | OTDLT | | \$ (176,368) | \$ (132,150) | \$ (19,537) | \$ (430) | \$ (9,268) | \$ (5,948) | \$ (5,705) | \$ - | \$ (188) |
| Distribution Line Transformers | | | | | | | | | | | | |
| Demand | OTAX | OTDLTD | SICDT | \$ (17,771) | \$ (12,294) | \$ (1,965) | \$ - | \$ (1,861) | \$ - | \$ (1,552) | \$ - | \$ - |
| Customer | OTAX | OTDLTCC | Cust09 | (9,906) | (8,569) | (1,029) | - | (63) | - | (11) | - | - |
| Total Distribution Line Transformers | | OTDLTT | | \$ (27,677) | \$ (20,863) | \$ (2,994) | \$ - | \$ (1,924) | \$ - | \$ (1,564) | \$ - | \$ - |
| Distribution Services | | | | | | | | | | | | |
| Customer | OTAX | OTDSC | C02 | \$ (6,333) | \$ (5,455) | \$ (777) | \$ - | \$ (80) | \$ - | \$ (21) | \$ - | \$ - |
| Distribution Meters | | | | | | | | | | | | |
| Customer | OTAX | OTDMC | C03 | \$ (6,459) | \$ (4,415) | \$ (1,372) | \$ (45) | \$ (384) | \$ (90) | \$ (76) | \$ (63) | \$ (1) |
| Distribution Street & Customer Lighting | | | | | | | | | | | | |
| Customer | OTAX | OTDSCL | C04 | \$ (20,882) | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Customer Accounts Expense | | | | | | | | | | | | |
| Customer | OTAX | OTCAE | C05 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Customer Service & Info. | | | | | | | | | | | | |
| Customer | OTAX | OTCSI | C05 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Sales Expense | | | | | | | | | | | | |
| Customer | OTAX | OTSEC | C06 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Total | | OTT | | \$ (916,996) | \$ (480,652) | \$ (100,161) | \$ (5,556) | \$ (96,073) | \$ (84,484) | \$ (73,531) | \$ (34,549) | \$ (2,252) |

LOUISVILLE GAS AND ELECTRIC COMPANY
 Cost of Service Study
 Class Allocation

12 Months Ended
 June 30, 2022

| Description | Ref | 1 Name | 2 Allocation Vector | 12 | | 13 | | 14 | | 15 | | 16 | | 17 | | 18 | |
|--|------|-----------|---------------------------|---------------------------------|----------------------------|-------------------------------------|--|---|-------------------------|---------------------------|---|----|---|----|---|----|---|
| | | | | Street Lighting Rate RLS, LS | Street Lighting Rate LE | Traffic Street Lighting Rate TLE | Outdoor Sports Lighting Rate OSL | Electric Vehicle Charging Rate EV | Solar Share Rate SSP | Business Solar Rate BS | | | | | | | |
| Amortization of ITC | | | | | | | | | | | | | | | | | |
| Power Production Plant | | | | | | | | | | | | | | | | | |
| Production Demand - LOLP | OTAX | OTPPLOLP | PITCLOLPDA | \$ (91) | \$ (3) | \$ (88) | \$ (0) | \$ (1) | \$ (13,728) | \$ (399) | | | | | | | |
| Production Energy | OTAX | OTPPEB | E01 | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| Total Power Production Plant | | OTPPT | | \$ (91) | \$ (3) | \$ (88) | \$ (0) | \$ (1) | \$ (13,728) | \$ (399) | | | | | | | |
| Transmission Plant | | | | | | | | | | | | | | | | | |
| Transmission Demand | OTAX | OTTRB | NCPT | \$ (716) | \$ (25) | \$ (11) | \$ (1) | \$ (0) | \$ - | \$ - | | | | | | | |
| Distribution Poles | | | | | | | | | | | | | | | | | |
| Specific | OTAX | OTDPS | NCPP | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | | | | | | | |
| Distribution Substation | | | | | | | | | | | | | | | | | |
| General | OTAX | OTDSG | NCPP | \$ (290) | \$ (10) | \$ (5) | \$ (1) | \$ (0) | \$ - | \$ - | | | | | | | |
| Distribution Primary & Secondary Lines | | | | | | | | | | | | | | | | | |
| Primary Specific | OTAX | OTDPLS | NCPP | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | | | | | | | |
| Primary Demand | OTAX | OTDPLD | NCPP | (445) | (16) | (7) | (1) | (0) | - | - | | | | | | | |
| Primary Customer | OTAX | OTDPLC | Cust08 | (1,970) | (3) | (22) | (0) | (2) | - | - | | | | | | | |
| Secondary Demand | OTAX | OTDSL D | SICD | (84) | (3) | (1) | (0) | (0) | - | - | | | | | | | |
| Secondary Customer | OTAX | OTDSL C | Cust07 | (579) | (1) | (6) | - | (1) | - | - | | | | | | | |
| Total Distribution Primary & Secondary Lines | | OTDLT | | \$ (3,078) | \$ (23) | \$ (36) | \$ (1) | \$ (3) | \$ - | \$ - | | | | | | | |
| Distribution Line Transformers | | | | | | | | | | | | | | | | | |
| Demand | OTAX | OTDLTD | SICDT | \$ (94) | \$ (3) | \$ (2) | \$ (0) | \$ (0) | \$ - | \$ - | | | | | | | |
| Customer | OTAX | OTDLTC | Cust09 | (229) | (0) | (3) | (0) | (0) | - | - | | | | | | | |
| Total Distribution Line Transformers | | OTDLTT | | \$ (324) | \$ (4) | \$ (4) | \$ (0) | \$ (0) | \$ - | \$ - | | | | | | | |
| Distribution Services | | | | | | | | | | | | | | | | | |
| Customer | OTAX | OTDSC | C02 | \$ - | \$ - | \$ - | \$ (0) | \$ - | \$ - | \$ - | | | | | | | |
| Distribution Meters | | | | | | | | | | | | | | | | | |
| Customer | OTAX | OTDMC | C03 | \$ - | \$ (2) | \$ (12) | \$ (0) | \$ - | \$ - | \$ - | | | | | | | |
| Distribution Street & Customer Lighting | | | | | | | | | | | | | | | | | |
| Customer | OTAX | OTDSCL | C04 | \$ (20,882) | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | | | | | | | |
| Customer Accounts Expense | | | | | | | | | | | | | | | | | |
| Customer | OTAX | OTCAE | C05 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | | | | | | | |
| Customer Service & Info. | | | | | | | | | | | | | | | | | |
| Customer | OTAX | OTCSI | C05 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | | | | | | | |
| Sales Expense | | | | | | | | | | | | | | | | | |
| Customer | OTAX | OTSEC | C06 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | | | | | | | |
| Total | | OTT | | \$ (25,380) | \$ (67) | \$ (156) | \$ (3) | \$ (4) | \$ (13,728) | \$ (399) | | | | | | | |

LOUISVILLE GAS AND ELECTRIC COMPANY
Cost of Service Study
Class Allocation

12 Months Ended
June 30, 2022

| Description | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | |
|--|--------|----------|-------------------|---------------|---------------------|-------------------------|-----------------|-------------------|------------------|--------------------|-----------------------|---------------------------|
| Description | Ref | Name | Allocation Vector | Total System | Residential Rate RS | General Service Rate GS | Rate PS Primary | Rate PS Secondary | Rate TOD Primary | Rate TOD Secondary | Rate RTS Transmission | Special Contract Customer |
| Interest Expenses | | | | | | | | | | | | |
| Power Production Plant | | | | | | | | | | | | |
| Production Demand - LOLP | INTLTD | INTPLOLP | LOLP | \$ 45,829,811 | \$ 21,866,290 | \$ 5,160,692 | \$ 349,427 | \$ 5,778,517 | \$ 5,491,868 | \$ 4,515,428 | \$ 2,513,881 | \$ 138,224 |
| Production Energy | INTLTD | INTPEB | E01 | - | - | - | - | - | - | - | - | - |
| Total Power Production Plant | | INTPT | | \$ 45,829,811 | \$ 21,866,290 | \$ 5,160,692 | \$ 349,427 | \$ 5,778,517 | \$ 5,491,868 | \$ 4,515,428 | \$ 2,513,881 | \$ 138,224 |
| Transmission Plant | | | | | | | | | | | | |
| Transmission Demand | INTLTD | INTTRB | NCPT | \$ 7,262,774 | \$ 3,436,160 | \$ 839,345 | \$ 55,097 | \$ 933,932 | \$ 783,218 | \$ 741,503 | \$ 386,681 | \$ 24,848 |
| Distribution Poles | | | | | | | | | | | | |
| Specific | INTLTD | INTDPS | NCPP | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Distribution Substation | | | | | | | | | | | | |
| General | INTLTD | INTDSG | NCPP | \$ 2,785,976 | \$ 1,392,224 | \$ 340,076 | \$ 22,324 | \$ 378,400 | \$ 317,335 | \$ 300,434 | \$ - | \$ 10,068 |
| Distribution Primary & Secondary Lines | | | | | | | | | | | | |
| Primary Specific | INTLTD | INDPLS | NCPP | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Primary Demand | INTLTD | INDPLD | NCPP | 4,276,970 | 2,137,312 | 522,077 | 34,271 | 580,911 | 487,166 | 461,219 | - | 15,456 |
| Primary Customer | INTLTD | INDPLC | Cust08 | 6,998,958 | 6,051,730 | 726,968 | 1,122 | 44,593 | 2,109 | 8,094 | - | 32 |
| Secondary Demand | INTLTD | INDSLD | SICD | 1,193,314 | 904,534 | 144,561 | - | 136,920 | - | - | - | - |
| Secondary Customer | INTLTD | INDSLC | Cust07 | 2,039,081 | 1,777,327 | 213,503 | - | - | - | - | - | - |
| Total Distribution Primary & Secondary Lines | | INDLT | | \$ 14,508,323 | \$ 10,870,903 | \$ 1,607,110 | \$ 35,393 | \$ 762,424 | \$ 489,275 | \$ 469,313 | \$ - | \$ 15,488 |
| Distribution Line Transformers | | | | | | | | | | | | |
| Demand | INTLTD | INDLTD | SICDT | \$ 1,461,877 | \$ 1,011,312 | \$ 161,626 | \$ - | \$ 153,083 | \$ - | \$ 127,695 | \$ - | \$ - |
| Customer | INTLTD | INDLTC | Cust09 | 814,862 | 704,908 | 84,678 | - | 5,194 | - | 943 | - | - |
| Total Distribution Line Transformers | | INDLTT | | \$ 2,276,738 | \$ 1,716,220 | \$ 246,304 | \$ - | \$ 158,277 | \$ - | \$ 128,638 | \$ - | \$ - |
| Distribution Services | | | | | | | | | | | | |
| Customer | INTLTD | INDSC | C02 | \$ 520,999 | \$ 448,748 | \$ 63,912 | \$ - | \$ 6,574 | \$ - | \$ 1,762 | \$ - | \$ - |
| Distribution Meters | | | | | | | | | | | | |
| Customer | INTLTD | INDMC | C03 | \$ 531,329 | \$ 363,188 | \$ 112,844 | \$ 3,688 | \$ 31,557 | \$ 7,367 | \$ 6,239 | \$ 5,206 | \$ 112 |
| Distribution Street & Customer Lighting | | | | | | | | | | | | |
| Customer | INTLTD | INDSCL | C04 | \$ 1,717,757 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Customer Accounts Expense | | | | | | | | | | | | |
| Customer | INTLTD | INCAE | C05 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Customer Service & Info. | | | | | | | | | | | | |
| Customer | INTLTD | INCSI | C05 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Sales Expense | | | | | | | | | | | | |
| Customer | INTLTD | INSEC | C06 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Total | | INTT | | \$ 75,433,705 | \$ 40,093,733 | \$ 8,370,283 | \$ 465,929 | \$ 8,049,680 | \$ 7,089,064 | \$ 6,163,317 | \$ 2,905,768 | \$ 188,740 |

LOUISVILLE GAS AND ELECTRIC COMPANY
 Cost of Service Study
 Class Allocation

12 Months Ended
 June 30, 2022

| Description | 1 Ref | 2 Name | 3 Allocation Vector | 12 Street Lighting Rate RLS, LS | 13 Street Lighting Rate LE | 14 Traffic Street Lighting Rate TLE | 15 Outdoor Sports Lighting Rate OSL | 16 Electric Vehicle Charging Rate EV | 17 Solar Share Rate SSP | 18 Business Solar Rate BS |
|--|----------|-----------|------------------------|------------------------------------|-------------------------------|--|--|---|----------------------------|------------------------------|
| Interest Expenses | | | | | | | | | | |
| Power Production Plant | | | | | | | | | | |
| Production Demand - LOLP | INTLTD | INTPLOLP | LOLP | \$ 7,672 | \$ 267 | \$ 7,445 | \$ 18 | \$ 80 | \$ - | \$ - |
| Production Energy | INTLTD | INTPEB | E01 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Total Power Production Plant | | INTPT | | \$ 7,672 | \$ 267 | \$ 7,445 | \$ 18 | \$ 80 | \$ - | \$ - |
| Transmission Plant | | | | | | | | | | |
| Transmission Demand | INTLTD | INTTRB | NCPT | \$ 58,884 | \$ 2,051 | \$ 941 | \$ 102 | \$ 10 | \$ - | \$ - |
| Distribution Poles | | | | | | | | | | |
| Specific | INTLTD | INTDPS | NCPP | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Distribution Substation | | | | | | | | | | |
| General | INTLTD | INTDSG | NCPP | \$ 23,858 | \$ 831 | \$ 381 | \$ 42 | \$ 4 | \$ - | \$ - |
| Distribution Primary & Secondary Lines | | | | | | | | | | |
| Primary Specific | INTLTD | INDPLS | NCPP | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Primary Demand | INTLTD | INDPLD | NCPP | \$ 36,626 | \$ 1,276 | \$ 586 | \$ 64 | \$ 6 | \$ - | \$ - |
| Primary Customer | INTLTD | INDPLC | Cust08 | \$ 162,066 | \$ 287 | \$ 1,781 | \$ 16 | \$ 160 | \$ - | \$ - |
| Secondary Demand | INTLTD | INDSLD | SICD | \$ 6,933 | \$ 241 | \$ 111 | \$ 12 | \$ 1 | \$ - | \$ - |
| Secondary Customer | INTLTD | INDSLC | Cust07 | \$ 47,597 | \$ 84 | \$ 523 | \$ - | \$ 47 | \$ - | \$ - |
| Total Distribution Primary & Secondary Lines | | INDLT | | \$ 253,222 | \$ 1,888 | \$ 3,000 | \$ 92 | \$ 215 | \$ - | \$ - |
| Distribution Line Transformers | | | | | | | | | | |
| Demand | INTLTD | INDLTD | SICDT | \$ 7,752 | \$ 270 | \$ 124 | \$ 13 | \$ 1 | \$ - | \$ - |
| Customer | INTLTD | INDLTC | Cust09 | \$ 18,877 | \$ 33 | \$ 207 | \$ 2 | \$ 19 | \$ - | \$ - |
| Total Distribution Line Transformers | | INDLTT | | \$ 26,629 | \$ 303 | \$ 331 | \$ 15 | \$ 20 | \$ - | \$ - |
| Distribution Services | | | | | | | | | | |
| Customer | INTLTD | INDSC | C02 | \$ - | \$ - | \$ - | \$ 2 | \$ - | \$ - | \$ - |
| Distribution Meters | | | | | | | | | | |
| Customer | INTLTD | INDMC | C03 | \$ - | \$ 155 | \$ 962 | \$ 11 | \$ - | \$ - | \$ - |
| Distribution Street & Customer Lighting | | | | | | | | | | |
| Customer | INTLTD | INDSCL | C04 | \$ 1,717,757 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Customer Accounts Expense | | | | | | | | | | |
| Customer | INTLTD | INCAE | C05 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Customer Service & Info. | | | | | | | | | | |
| Customer | INTLTD | INCSI | C05 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Sales Expense | | | | | | | | | | |
| Customer | INTLTD | INSEC | C06 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Total | | INTT | | \$ 2,088,022 | \$ 5,495 | \$ 13,061 | \$ 283 | \$ 330 | \$ - | \$ - |

LOUISVILLE GAS AND ELECTRIC COMPANY
Cost of Service Study
Class Allocation

12 Months Ended
June 30, 2022

| Description | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | |
|--|---------|--------|-------------------|------------------|---------------------|-------------------------|-----------------|-------------------|------------------|--------------------|-----------------------|---------------------------|
| Description | Ref | Name | Allocation Vector | Total System | Residential Rate RS | General Service Rate GS | Rate PS Primary | Rate PS Secondary | Rate TOD Primary | Rate TOD Secondary | Rate RTS Transmission | Special Contract Customer |
| Cost of Service Summary -- Unadjusted | | | | | | | | | | | | |
| Operating Revenues | | | | | | | | | | | | |
| Sales to Ultimate Consumers | REVUC | R01 | | \$ 1,066,653,012 | \$ 431,824,736 | \$ 148,100,588 | \$ 10,054,862 | \$ 147,448,878 | \$ 136,688,085 | \$ 101,626,163 | \$ 64,286,867 | \$ 3,635,160 |
| Sales for Resale | | Energy | | 34,405,720 | 12,366,967 | 3,656,201 | 309,759 | 4,608,468 | 5,957,248 | 3,934,269 | 3,081,524 | 168,465 |
| Transmission Revenue | | PLTRT | | 12,094,529 | 5,722,158 | 1,397,741 | 91,752 | 1,555,255 | 1,304,274 | 1,234,808 | 643,931 | 41,379 |
| Ancillary Services | | L0LP | | 665,560 | 317,551 | 74,946 | 5,075 | 83,918 | 79,755 | 65,575 | 36,508 | 2,007 |
| Curtaillable Service Rider | | | | (2,468,360) | | | | | (142,467) | - | (2,325,893) | |
| Forfeited Discounts | FORDIS | FDIS | | 2,706,693 | 2,147,240 | 209,025 | 7,005 | 278,420 | 13,168 | 50,533 | 1,301 | - |
| Misc Service Revenues | REVMISC | MISCR | | 1,545,789 | 1,474,975 | 58,585 | 244 | 9,717 | 460 | 1,764 | 45 | - |
| Rent From Electric Property | | RFEP | | 3,799,537 | 2,011,449 | 421,907 | 23,601 | 405,923 | 361,224 | 311,611 | 149,299 | 9,665 |
| Other Electric Revenue | | OER | | 662,367 | 350,653 | 73,550 | 4,114 | 70,764 | 62,972 | 54,323 | 26,027 | 1,685 |
| Electric Vehicle Charging Fees | | | | 11,088 | | | | | | | | |
| Total Operating Revenues | TOR | | | \$ 1,120,075,935 | \$ 456,215,729 | \$ 153,992,543 | \$ 10,496,412 | \$ 154,461,344 | \$ 144,324,718 | \$ 107,279,046 | \$ 65,899,608 | \$ 3,858,362 |
| Operating Expenses | | | | | | | | | | | | |
| Operation and Maintenance Expenses | | | | \$ 643,436,661 | \$ 283,536,077 | \$ 72,621,803 | \$ 4,979,918 | \$ 76,879,988 | \$ 88,717,355 | \$ 63,134,706 | \$ 43,724,366 | \$ 2,482,051 |
| Depreciation Expenses | | | | 277,122,836 | 141,321,587 | 30,910,647 | 1,868,663 | 31,666,501 | 28,868,139 | 24,459,931 | 12,451,532 | 748,439 |
| Regulatory Credits | | | | - | - | - | - | - | - | - | - | - |
| Accretion Expense | | | | - | - | - | - | - | - | - | - | - |
| Depreciation for Asset Retirement Costs | | DET | | - | - | - | - | - | - | - | - | - |
| Amortization Expense | | DET | | - | - | - | - | - | - | - | - | - |
| Property and Other Taxes | | NPT | | 42,336,722 | 22,498,958 | 4,696,829 | 261,456 | 4,517,259 | 3,978,262 | 3,458,769 | 1,630,638 | 105,919 |
| Amortization of Investment Tax Credit | | | | (916,996) | (480,652) | (100,161) | (5,556) | (96,073) | (84,484) | (73,531) | (34,549) | (2,252) |
| Other Expenses | | | | - | - | - | - | - | - | - | - | - |
| State and Federal Income Taxes | | TAXINC | | 7,757,584 | (2,886,134) | 3,518,578 | 274,593 | 3,138,581 | 1,478,672 | 951,208 | 490,049 | 31,482 |
| Total Operating Expenses | TOE | | | \$ 969,736,807 | \$ 443,989,835 | \$ 111,647,695 | \$ 7,379,074 | \$ 116,106,257 | \$ 122,957,944 | \$ 91,931,083 | \$ 58,262,037 | \$ 3,365,640 |
| Utility Operating Income | TOM | | | \$ 150,339,128 | \$ 12,225,894 | \$ 42,344,848 | \$ 3,117,338 | \$ 38,355,088 | \$ 21,366,773 | \$ 15,347,963 | \$ 7,637,571 | \$ 492,722 |
| Net Cost Rate Base | | | | \$ 3,460,077,816 | \$ 1,830,420,621 | \$ 383,935,310 | \$ 21,476,777 | \$ 369,390,342 | \$ 328,714,071 | \$ 283,566,435 | \$ 135,862,169 | \$ 8,795,357 |
| Taxable Income Unadjusted | | | | | | | | | | | | |
| Total Operating Revenue | | | | \$ 1,120,075,935 | \$ 456,215,729 | \$ 153,992,543 | \$ 10,496,412 | \$ 154,461,344 | \$ 144,324,718 | \$ 107,279,046 | \$ 65,899,608 | \$ 3,858,362 |
| Operating Expenses | | | | \$ 961,979,223 | \$ 446,875,970 | \$ 108,129,117 | \$ 7,104,481 | \$ 112,967,675 | \$ 121,479,273 | \$ 90,979,875 | \$ 57,771,988 | \$ 3,334,158 |
| Interest Expense | INTEXP | | | \$ 75,433,705 | \$ 40,093,733 | \$ 8,370,283 | \$ 465,929 | \$ 8,049,680 | \$ 7,089,064 | \$ 6,163,317 | \$ 2,905,768 | \$ 188,740 |
| Taxable Income | TAXINC | | | \$ 82,663,007 | \$ (30,753,973) | \$ 37,493,143 | \$ 2,926,001 | \$ 33,443,989 | \$ 15,756,381 | \$ 10,135,854 | \$ 5,221,852 | \$ 335,464 |

LOUISVILLE GAS AND ELECTRIC COMPANY

Cost of Service Study
Class Allocation

12 Months Ended
June 30, 2022

| Description | Ref | 1 Name | 2 Allocation Vector | 12 | 13 | 14 | 15 | 16 | 17 | 18 |
|--|---------|-----------|------------------------|------------------------------|-------------------------|----------------------------------|----------------------------------|-----------------------------------|----------------------|------------------------|
| | | | | Street Lighting Rate RLS, LS | Street Lighting Rate LE | Traffic Street Lighting Rate TLE | Outdoor Sports Lighting Rate OSL | Electric Vehicle Charging Rate EV | Solar Share Rate SSP | Business Solar Rate BS |
| Cost of Service Summary -- Unadjusted | | | | | | | | | | |
| Operating Revenues | | | | | | | | | | |
| Sales to Ultimate Consumers | REVUC | R01 | | \$ 22,160,940 | \$ 243,959 | \$ 318,742 | \$ 15,468 | \$ 1,533 | \$ 237,096 | \$ 9,936 |
| Sales for Resale | | Energy | | 302,375 | 10,532 | 9,822 | 35 | 56 | - | - |
| Transmission Revenue | | PLTRT | | 98,058 | 3,415 | 1,568 | 171 | 17 | - | - |
| Ancillary Services | | LOLP | | 111 | 4 | 108 | 0 | 1 | - | - |
| Curtaillable Service Rider | | | | | | | | | | |
| Forfeited Discounts | FORDIS | FDIS | | 0 | - | - | - | - | - | - |
| Misc Service Revenues | REVMISC | MISCR | | - | - | - | - | - | - | - |
| Rent From Electric Property | | RFEP | | 103,878 | 305 | 660 | 15 | - | - | - |
| Other Electric Revenue | | OER | | 18,109 | 53 | 115 | 3 | - | - | - |
| Electric Vehicle Charging Fees | | | | | | | | 11,088 | - | - |
| Total Operating Revenues | TOR | | | \$ 22,683,471 | \$ 258,268 | \$ 331,014 | \$ 15,692 | \$ 12,695 | \$ 237,096 | \$ 9,936 |
| Operating Expenses | | | | | | | | | | |
| Operation and Maintenance Expenses | | | | \$ 6,925,874 | \$ 145,720 | \$ 178,418 | \$ 1,886 | \$ 26,596 | \$ 71,903 | \$ 10,000 |
| Depreciation Expenses | | | | 4,661,198 | 12,435 | 46,824 | 649 | 19,265 | 83,870 | 3,154 |
| Regulatory Credits | | | | - | - | - | - | - | - | - |
| Accretion Expense | | | | - | - | - | - | - | - | - |
| Depreciation for Asset Retirement Costs | | DET | | - | - | - | - | - | - | - |
| Amortization Expense | | DET | | - | - | - | - | - | - | - |
| Property and Other Taxes | | NPT | | 1,171,890 | 3,083 | 7,325 | 159 | 2,875 | 3,190 | 111 |
| Amortization of Investment Tax Credit | | | | (25,380) | (67) | (156) | (3) | (4) | (13,728) | (399) |
| Other Expenses | | | | - | - | - | - | - | - | - |
| State and Federal Income Taxes | | TAXINC | | 737,804 | 8,596 | 8,028 | 1,194 | (3,413) | 8,621 | (275) |
| Total Operating Expenses | TOE | | | \$ 13,471,385 | \$ 169,768 | \$ 240,439 | \$ 3,884 | \$ 45,319 | \$ 153,856 | \$ 12,591 |
| Utility Operating Income | TOM | | | \$ 9,212,086 | \$ 88,500 | \$ 90,576 | \$ 11,807 | \$ (32,624) | \$ 83,240 | \$ (2,655) |
| Net Cost Rate Base | | | | \$ 94,529,248 | \$ 277,529 | \$ 600,893 | \$ 13,251 | \$ 120,516 | \$ 2,314,622 | \$ 60,677 |
| Taxable Income Unadjusted | | | | | | | | | | |
| Total Operating Revenue | | | | \$ 22,683,471 | \$ 258,268 | \$ 331,014 | \$ 15,692 | \$ 12,695 | \$ 237,096 | \$ 9,936 |
| Operating Expenses | | | | \$ 12,733,581 | \$ 161,171 | \$ 232,411 | \$ 2,691 | \$ 48,732 | \$ 145,235 | \$ 12,866 |
| Interest Expense | INTEXP | | | \$ 2,088,022 | \$ 5,495 | \$ 13,061 | \$ 283 | \$ 330 | \$ - | \$ - |
| Taxable Income | TAXINC | | | \$ 7,861,868 | \$ 91,601 | \$ 85,542 | \$ 12,718 | \$ (36,366) | \$ 91,861 | \$ (2,930) |

LOUISVILLE GAS AND ELECTRIC COMPANY
Cost of Service Study
Class Allocation

12 Months Ended
June 30, 2022

| Description | Ref | 1 Name | 2 Allocation Vector | 3 Total System | 4 Residential Rate RS | 5 General Service Rate GS | 6 Rate PS Primary | 7 Rate PS Secondary | 8 Rate TOD Primary | 9 Rate TOD Secondary | 10 Rate RTS Transmission | 11 Special Contract Customer |
|---|-----|-----------|------------------------|-------------------|--------------------------|------------------------------|----------------------|------------------------|-----------------------|-------------------------|-----------------------------|---------------------------------|
| | | | | | | | | | | | | |
| Cost of Service Summary -- Pro-Forma | | | | | | | | | | | | |
| Operating Revenues | | | | | | | | | | | | |
| Total Pro-Forma Operating Revenue | | | | \$ 1,120,075,935 | \$ 456,215,729 | \$ 153,992,543 | \$ 10,496,412 | \$ 154,461,344 | \$ 144,324,718 | \$ 107,279,046 | \$ 65,899,608 | \$ 3,858,362 |
| Operating Expenses | | | | | | | | | | | | |
| Operation and Maintenance Expenses | | | | \$ 643,436,661 | \$ 283,536,077 | \$ 72,621,803 | \$ 4,979,918 | \$ 76,879,988 | \$ 88,717,355 | \$ 63,134,706 | \$ 43,724,366 | \$ 2,482,051 |
| Depreciation and Amortization Expenses | | | | 277,122,836 | 141,321,587 | 30,910,647 | 1,868,663 | 31,666,501 | 28,868,139 | 24,459,931 | 12,451,532 | 748,439 |
| Property and Other Taxes | | NPT | | 42,336,722 | 22,498,958 | 4,696,829 | 261,456 | 4,517,259 | 3,978,262 | 3,458,769 | 1,630,638 | 105,919 |
| Amortization of Investment Tax Credit | | | | (916,996) | (480,652) | (100,161) | (5,556) | (96,073) | (84,484) | (73,531) | (34,549) | (2,252) |
| State and Federal Income Taxes | | TAXINC | | 7,757,584 | (2,886,134) | 3,518,578 | 274,593 | 3,138,581 | 1,478,672 | 951,208 | 490,049 | 31,482 |
| Specific Assignment of Interruptible Credit | | | | (2,468,360) | - | - | - | - | (142,467) | - | (2,325,893) | - |
| Allocation of Interruptible Credits | | INTCRE | | 2,468,360 | 1,177,704 | 277,952 | 18,820 | 311,227 | 295,789 | 243,198 | 135,396 | 7,445 |
| Total Operating Expenses | | TOE | | \$ 969,736,807 | \$ 445,167,540 | \$ 111,925,647 | \$ 7,397,894 | \$ 116,417,484 | \$ 123,111,266 | \$ 92,174,281 | \$ 56,071,540 | \$ 3,373,084 |
| Net Operating Income -- Pro-Forma | | | | \$ 150,339,128 | \$ 11,048,190 | \$ 42,066,897 | \$ 3,098,518 | \$ 38,043,860 | \$ 21,213,452 | \$ 15,104,765 | \$ 9,828,068 | \$ 485,278 |
| Cost of Service Summary -- Pro-Forma | | | | | | | | | | | | |
| Net Operating Income -- Pro-Forma | | | | \$ 150,339,128 | \$ 11,048,190 | \$ 42,066,897 | \$ 3,098,518 | \$ 38,043,860 | \$ 21,213,452 | \$ 15,104,765 | \$ 9,828,068 | \$ 485,278 |
| Adjusted Net Cost Rate Base | | | | \$ 3,460,077,816 | \$ 1,830,420,621 | \$ 383,935,310 | \$ 21,476,777 | \$ 369,390,342 | \$ 328,714,071 | \$ 283,566,435 | \$ 135,862,169 | \$ 8,795,357 |
| Rate of Return | | | | 4.34% | 0.60% | 10.96% | 14.43% | 10.30% | 6.45% | 5.33% | 7.23% | 5.52% |
| Taxable Income Pro-Forma | | | | | | | | | | | | |
| Total Operating Revenue | | | | \$ 1,120,075,935 | \$ 456,215,729 | \$ 153,992,543 | \$ 10,496,412 | \$ 154,461,344 | \$ 144,324,718 | \$ 107,279,046 | \$ 65,899,608 | \$ 3,858,362 |
| Operating Expenses | | | | \$ 961,979,223 | \$ 448,053,674 | \$ 108,407,069 | \$ 7,123,301 | \$ 113,278,903 | \$ 121,632,594 | \$ 91,223,073 | \$ 55,581,491 | \$ 3,341,602 |
| Interest Expense | | INTEXP | | \$ 75,433,705 | \$ 40,093,733 | \$ 8,370,283 | \$ 465,929 | \$ 8,049,680 | \$ 7,089,064 | \$ 6,163,317 | \$ 2,905,768 | \$ 188,740 |
| Interest Synchronization Adjustment | | | INTEXP | \$ 6,215,728 | \$ 3,303,719 | \$ 689,710 | \$ 38,393 | \$ 663,293 | \$ 584,138 | \$ 507,857 | \$ 239,435 | \$ 15,552 |
| Taxable Income | | TXINCPF | | \$ 76,447,279 | \$ (35,235,396) | \$ 36,525,482 | \$ 2,868,789 | \$ 32,469,469 | \$ 15,018,922 | \$ 9,384,800 | \$ 7,172,915 | \$ 312,467 |

LOUISVILLE GAS AND ELECTRIC COMPANY
Cost of Service Study
Class Allocation

12 Months Ended
June 30, 2022

| Description | 1 Ref | 2 Name | 12 Allocation Vector | 13 Street Lighting Rate RLS, LS | 14 Street Lighting Rate LE | 15 Traffic Street Lighting Rate TLE | 16 Outdoor Sports Lighting Rate OSL | 17 Electric Vehicle Charging Rate EV | 18 Solar Share Rate SSP | 19 Business Solar Rate BS |
|---|----------|-----------|----------------------------|---------------------------------------|----------------------------------|---|--|---|-------------------------------|---------------------------------|
| Cost of Service Summary -- Pro-Forma | | | | | | | | | | |
| Operating Revenues | | | | | | | | | | |
| Total Pro-Forma Operating Revenue | | | | \$ 22,683,471 | \$ 258,268 | \$ 331,014 | \$ 15,692 | \$ 12,695 | \$ 237,096 | \$ 9,936 |
| Operating Expenses | | | | | | | | | | |
| Operation and Maintenance Expenses | | | | \$ 6,925,874 | \$ 145,720 | \$ 178,418 | \$ 1,886 | \$ 26,596 | \$ 71,903 | \$ 10,000 |
| Depreciation and Amortization Expenses | | | | 4,661,198 | 12,435 | 46,824 | 649 | 19,265 | 83,870 | 3,154 |
| Property and Other Taxes | | NPT | | 1,171,890 | 3,083 | 7,325 | 159 | 2,875 | 3,190 | 111 |
| Amortization of Investment Tax Credit | | | | (25,380) | (67) | (156) | (3) | (4) | (13,728) | (399) |
| State and Federal Income Taxes | | TAXINC | | 737,804 | 8,596 | 8,028 | 1,194 | (3,413) | 8,621 | (275) |
| Specific Assignment of Interruptible Credit | | | | - | - | - | - | - | - | - |
| Allocation of Interruptible Credits | | INTCRE | | 413 | 14 | 401 | 1 | - | - | - |
| Total Operating Expenses | | TOE | | \$ 13,471,798 | \$ 169,782 | \$ 240,840 | \$ 3,885 | \$ 45,319 | \$ 153,856 | \$ 12,591 |
| Net Operating Income -- Pro-Forma | | | | \$ 9,211,673 | \$ 88,486 | \$ 90,175 | \$ 11,806 | \$ (32,624) | \$ 83,240 | \$ (2,655) |
| Cost of Service Summary -- Pro-Forma | | | | | | | | | | |
| Net Operating Income -- Pro-Forma | | | | \$ 9,211,673 | \$ 88,486 | \$ 90,175 | \$ 11,806 | \$ (32,624) | \$ 83,240 | \$ (2,655) |
| Adjusted Net Cost Rate Base | | | | \$ 94,529,248 | \$ 277,529 | \$ 600,893 | \$ 13,251 | \$ 120,516 | \$ 2,314,622 | \$ 60,677 |
| Rate of Return | | | | 9.74% | 31.88% | 15.01% | 89.10% | -27.07% | 3.60% | -4.38% |
| Taxable Income Pro-Forma | | | | | | | | | | |
| Total Operating Revenue | | | | \$ 22,683,471 | \$ 258,268 | \$ 331,014 | \$ 15,692 | \$ 12,695 | \$ 237,096 | \$ 9,936 |
| Operating Expenses | | | | \$ 12,733,994 | \$ 161,186 | \$ 232,812 | \$ 2,692 | \$ 48,732 | \$ 145,235 | \$ 12,866 |
| Interest Expense | | INTEXP | | \$ 2,088,022 | \$ 5,495 | \$ 13,061 | \$ 283 | \$ 330 | \$ - | \$ - |
| Interest Synchronization Adjustment | | | INTEXP | \$ 172,053 | \$ 453 | \$ 1,076 | \$ 23 | \$ 27 | \$ - | \$ - |
| Taxable Income | | TXINCPF | | \$ 7,689,402 | \$ 91,134 | \$ 84,065 | \$ 12,694 | \$ (36,394) | \$ 91,861 | \$ (2,930) |

LOUISVILLE GAS AND ELECTRIC COMPANY
Cost of Service Study
Class Allocation

12 Months Ended
June 30, 2022

| Description | 1 Ref | 2 Name | 3 Allocation Vector | 4 Total System | 5 Residential Rate RS | 6 General Service Rate GS | 7 Rate PS Primary | 8 Rate PS Secondary | 9 Rate TOD Primary | 10 Rate TOD Secondary | 11 Rate RTS Transmission | Special Contract Customer |
|--|----------|-----------|------------------------|-------------------|--------------------------|------------------------------|----------------------|------------------------|-----------------------|--------------------------|-----------------------------|---------------------------|
| Cost of Service Summary -- Pro-Forma (Adjusted for Proposed Increase) | | | | | | | | | | | | |
| Operating Revenues | | | | | | | | | | | | |
| Total Operating Revenue -- Actual | | | | \$ 1,120,075,935 | \$ 456,215,729 | \$ 153,992,543 | \$ 10,496,412 | \$ 154,461,344 | \$ 144,324,718 | \$ 107,279,046 | \$ 65,899,608 | \$ 3,858,362 |
| Pro-Forma Adjustments: | | | | | | | | | | | | |
| Proposed Increase | | | | \$ 130,962,989 | \$ 53,155,992 | \$ 19,105,822 | \$ 1,225,601 | \$ 17,917,377 | \$ 16,361,581 | \$ 12,216,545 | \$ 7,690,372 | \$ 435,109 |
| Revenue Adjustment for Solar Share and EV | | | | \$ 175,526 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Changes in Late Payment Fees | | FDIS | | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Changes to EVSE-R | | | | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Changes in Rent on Electric Property | | RFEP | | \$ 5,112 | \$ 2,706 | \$ 568 | \$ 32 | \$ 546 | \$ 486 | \$ 419 | \$ 201 | \$ 13 |
| Changes in Miscellaneous Charges | | MISCR | | \$ 89,459 | \$ 85,361 | \$ 3,390 | \$ 14 | \$ 562 | \$ 27 | \$ 102 | \$ 3 | \$ - |
| Total Pro-Forma Operating Revenue | | | | \$ 1,251,309,021 | \$ 509,459,788 | \$ 173,102,323 | \$ 11,722,059 | \$ 172,379,830 | \$ 160,686,811 | \$ 119,496,113 | \$ 73,590,184 | \$ 4,293,484 |
| Operating Expenses | | | | | | | | | | | | |
| Total Operating Expenses | | | | \$ 969,736,807 | \$ 445,167,540 | \$ 111,925,647 | \$ 7,397,894 | \$ 116,417,484 | \$ 123,111,266 | \$ 92,174,281 | \$ 56,071,540 | \$ 3,373,084 |
| Total Pro-Forma Adjustments | | | | | | | | | | | | |
| Incremental Uncollectible Accounts Expense | | | 0.182% | 238,844 | 96,904 | 34,780 | 2,231 | 32,612 | 29,779 | 22,235 | 13,997 | 792 |
| Incremental Commission Fees | | | 0.200% | 262,466 | 106,488 | 38,220 | 2,451 | 35,837 | 32,724 | 24,434 | 15,381 | 870 |
| Incremental Income Taxes | | | 24.85% | 32,610,703 | 13,230,857 | 4,748,676 | 304,567 | 4,452,645 | 4,065,891 | 3,035,874 | 1,911,066 | 108,125 |
| Total Pro-forma Operating Expenses | | | | \$ 1,002,848,820 | \$ 458,601,789 | \$ 116,747,322 | \$ 7,707,143 | \$ 120,938,578 | \$ 127,239,660 | \$ 95,256,824 | \$ 58,011,984 | \$ 3,482,872 |
| Net Operating Income -- Pro-Forma | | | | \$ 248,460,201 | \$ 50,858,000 | \$ 56,355,002 | \$ 4,014,916 | \$ 51,441,252 | \$ 33,447,152 | \$ 24,239,288 | \$ 15,578,200 | \$ 810,612 |
| Net Cost Rate Base | | | | \$ 3,460,077,816 | \$ 1,830,420,621 | \$ 383,935,310 | \$ 21,476,777 | \$ 369,390,342 | \$ 328,714,071 | \$ 283,566,435 | \$ 135,862,169 | \$ 8,795,357 |
| Rate of Return | | | | 7.18% | 2.78% | 14.68% | 18.69% | 13.93% | 10.18% | 8.55% | 11.47% | 9.22% |

LOUISVILLE GAS AND ELECTRIC COMPANY
 Cost of Service Study
 Class Allocation

12 Months Ended
 June 30, 2022

| Description | 1 Ref | 2 Name | 12 Allocation Vector | 13 Street Lighting Rate RLS, LS | 14 Street Lighting Rate LE | 14 Traffic Street Lighting Rate TLE | 15 Outdoor Sports Lighting Rate OSL | 16 Electric Vehicle Charging Rate EV | 17 Solar Share Rate SSP | 18 Business Solar Rate BS |
|--|----------|-----------|----------------------------|---------------------------------------|----------------------------------|---|--|---|-------------------------------|---------------------------------|
| Cost of Service Summary -- Pro-Forma (Adjusted for Proposed Increase) | | | | | | | | | | |
| Operating Revenues | | | | | | | | | | |
| Total Operating Revenue -- Actual | | | | \$ 22,683,471 | \$ 258,268 | \$ 331,014 | \$ 15,692 | \$ 12,695 | \$ 237,096 | \$ 9,936 |
| Pro-Forma Adjustments: | | | | | | | | | | |
| Proposed Increase | | | | \$ 2,856,239 | \$ 3 | \$ (14) | \$ (1,638) | \$ - | \$ - | \$ - |
| Revenue Adjustment for Solar Share and EV | | | | \$ - | \$ - | \$ - | \$ - | \$ 55,206 | \$ 110,942 | \$ 9,378 |
| Changes in Late Payment Fees | | FDIS | | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Changes to EVSE-R | | | | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Changes in Rent on Electric Property | | RFEP | | \$ 140 | \$ 0 | \$ 1 | \$ 0 | \$ - | \$ - | \$ - |
| Changes in Miscellaneous Charges | | MISCR | | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Total Pro-Forma Operating Revenue | | | | \$ 25,539,850 | \$ 258,271 | \$ 331,001 | \$ 14,054 | \$ 67,901 | \$ 348,038 | \$ 19,314 |
| Operating Expenses | | | | | | | | | | |
| Total Operating Expenses | | | | \$ 13,471,798 | \$ 169,782 | \$ 240,840 | \$ 3,885 | \$ 45,319 | \$ 153,856 | \$ 12,591 |
| Total Pro-Forma Adjustments | | | | | | | | | | |
| Incremental Uncollectible Accounts Expense | | | 0.182% | 5,199 | 0 | (0) | (3) | 100 | 202 | 17 |
| Incremental Commission Fees | | | 0.200% | 5,713 | 0 | (0) | (3) | 110 | 222 | 19 |
| Incremental Income Taxes | | | 24.85% | 709,794 | 1 | (3) | (407) | 13,718 | 27,568 | 2,330 |
| Total Pro-forma Operating Expenses | | | | \$ 14,192,504 | \$ 169,783 | \$ 240,836 | \$ 3,472 | \$ 59,248 | \$ 181,848 | \$ 14,957 |
| Net Operating Income -- Pro-Forma | | | | \$ 11,347,346 | \$ 88,488 | \$ 90,165 | \$ 10,582 | \$ 8,653 | \$ 166,190 | \$ 4,357 |
| Net Cost Rate Base | | | | \$ 94,529,248 | \$ 277,529 | \$ 600,893 | \$ 13,251 | \$ 120,516 | \$ 2,314,622 | \$ 60,677 |
| Rate of Return | | | | 12.00% | 31.88% | 15.01% | 79.86% | 7.18% | 7.18% | 7.18% |

LOUISVILLE GAS AND ELECTRIC COMPANY
 Cost of Service Study
 Class Allocation

12 Months Ended
 June 30, 2022

| | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | |
|---|-------|---------|-------------------|----------------|---------------------|-------------------------|-----------------|-------------------|------------------|--------------------|-----------------------|---------------------------|
| Description | Ref | Name | Allocation Vector | Total System | Residential Rate RS | General Service Rate GS | Rate PS Primary | Rate PS Secondary | Rate TOD Primary | Rate TOD Secondary | Rate RTS Transmission | Special Contract Customer |
| Allocation Factors | | | | | | | | | | | | |
| Energy Allocation Factors | | | | | | | | | | | | |
| Energy Usage by Class | E01 | Energy | | 1.000000 | 0.359445 | 0.106267 | 0.009003 | 0.133945 | 0.173147 | 0.114349 | 0.089564 | 0.004896 |
| Customer Allocation Factors | | | | | | | | | | | | |
| Primary Distribution Plant -- Average Number of Customers | C01 | Cust08 | | 1.000000 | 0.86466 | 0.10387 | 0.00016 | 0.00637 | 0.00030 | 0.00116 | - | 0.00000 |
| Customer Services -- Weighted cost of Services | C02 | | | 1.000000 | 0.86132 | 0.12267 | - | 0.01262 | - | 0.00338 | - | - |
| Meter Costs -- Weighted Cost of Meters | C03 | | | 1.000000 | 0.68355 | 0.21238 | 0.00694 | 0.05939 | 0.01387 | 0.01174 | 0.00980 | 0.00021 |
| Lighting Systems -- Lighting Customers | C04 | Cust04 | | 1.000000 | - | - | - | - | - | - | - | - |
| Meter Reading and Billing -- Weighted Cost | C05 | Cust05 | | 1.000000 | 0.74171 | 0.17820 | 0.00069 | 0.02733 | 0.00646 | 0.02480 | 0.00064 | 0.00002 |
| Marketing/Economic Development | C06 | Cust06 | | 1.000000 | 0.86464 | 0.10386 | 0.00016 | 0.00637 | 0.00030 | 0.00116 | 0.00003 | 0.00000 |
| Revenue per Billing Determinants | R01 | | | 1,066,653,012 | 431,824,736 | 148,100,588 | 10,054,862 | 147,448,878 | 136,688,085 | 101,626,163 | 64,286,867 | 3,635,160 |
| Energy | | | | 11,352,592,561 | 4,049,109,440 | 1,197,088,880 | 103,621,086 | 1,508,873,858 | 1,992,826,476 | 1,288,132,009 | 1,050,890,542 | 56,355,100 |
| Energy (Loss Adjusted) | | Energy | | 11,999,883,068 | 4,313,299,004 | 1,275,194,546 | 108,036,539 | 1,607,322,352 | 2,077,743,868 | 1,372,177,906 | 1,074,760,983 | 58,756,477 |
| O&M Customer Allocators | | | | | | | | | | | | |
| Customers (Monthly Bills) | | | | 6,223,717 | 4,531,186 | 544,312 | 840 | 33,389 | 1,579 | 6,060 | 156 | 24 |
| Average Customers (Bills/12) | | | | 518,643 | 377,599 | 45,359 | 70 | 2,782 | 132 | 505 | 13 | 2 |
| Average Customers (Lighting = Lights) | | | | 518,643 | 377,599 | 45,359 | 70 | 2,782 | 132 | 505 | 13 | 2 |
| Weighted Average Customers (Lighting = 9 Lights per Cust) | | Cust05 | | 509,096 | 377,599 | 90,719 | 350 | 13,912 | 3,290 | 12,625 | 325 | 10 |
| Street Lighting | | Cust04 | | 91,009 | - | - | - | - | - | - | - | - |
| Average Customers | | Cust01 | | 518,643 | 377,599 | 45,359 | 70 | 2,782 | 132 | 505 | 13 | 2 |
| Average Customers (Lighting = 9 Lights per Cust) | | Cust06 | | 436,714 | 377,599 | 45,359 | 70 | 2,782 | 132 | 505 | 13 | 2 |
| Average Secondary Customers | | Cust07 | | 433,209 | 377,599 | 45,359 | - | - | - | - | - | - |
| Average Primary Customers | | Cust08 | | 436,701 | 377,599 | 45,359 | 70 | 2,782 | 132 | 505 | - | 2 |
| Average Transformer Customers | | Cust09 | | 436,498 | 377,599 | 45,359 | - | 2,782 | - | 505 | - | - |
| Plant Customer Allocators | | | | | | | | | | | | |
| Average Customers | | | | 518,575 | 377,557 | 45,332 | 70 | 2,783 | 132 | 505 | 13 | 2 |
| Average Customers (Lighting = 9 Lights) | | | | 435,622 | 377,557 | 45,332 | 70 | 2,783 | 132 | 505 | 13 | 2 |
| Weighted Average Customers | | PCust05 | | 507,988 | 377,557 | 90,664 | 350 | 13,915 | 3,300 | 12,625 | 325 | 10 |
| Street Lighting (plant in service balance) | | PCust04 | | 126,670,914 | - | - | - | - | - | - | - | - |
| Average Customers | | PCust01 | | 518,575 | 377,557 | 45,332 | 70 | 2,783 | 132 | 505 | 13 | 2 |
| Average Customers (Lighting = 9 Lights per Cust) | | PCust06 | | 435,622 | 377,557 | 45,332 | 70 | 2,783 | 132 | 505 | 13 | 2 |
| Average Secondary Customers | | PCust07 | | 432,318 | 377,557 | 45,332 | 70 | - | 132 | - | - | - |
| Average Primary Customers | | PCust08 | | 435,622 | 377,557 | 45,332 | 70 | 2,783 | 132 | 505 | 13 | 2 |
| Average Transformer Customers | | PCust09 | | 435,405 | 377,557 | 45,332 | - | 2,783 | - | 505 | - | - |
| Demand Allocators | | | | | | | | | | | | |
| Max Class Non-Coincident Peak Demands (Transmission) | NCPT | | | 2,982,631 | 1,411,141 | 344,697 | 22,627 | 383,541 | 321,647 | 304,516 | 158,800 | 10,205 |
| Max Class Non-Coincident Peak Demands (Primary) | NCPP | | | 2,823,831 | 1,411,141 | 344,697 | 22,627 | 383,541 | 321,647 | 304,516 | - | 10,205 |
| Sum of the Individual Customer Demands (Transformers) | SICDT | | | 4,560,291 | 3,154,764 | 504,189 | - | 477,538 | - | 398,342 | - | - |
| Sum of the Individual Customer Demands (Secondary) | SICD | | | 4,161,949 | 3,154,764 | 504,189 | - | 477,538 | - | - | - | - |
| LOLP Demand Allocator | LOLP | | | 1,891,712 | 902,573 | 213,017 | 14,423 | 238,519 | 226,687 | 186,383 | 103,765 | 5,705 |

LOUISVILLE GAS AND ELECTRIC COMPANY

Cost of Service Study
Class Allocation

12 Months Ended
June 30, 2022

| Description | Ref | 1 Name | 2 Allocation Vector | 12 Street Lighting Rate RLS, LS | 13 Street Lighting Rate LE | 14 Traffic Street Lighting Rate TLE | 15 Outdoor Sports Lighting Rate OSL | 16 Electric Vehicle Charging Rate EV | 17 Solar Share Rate SSP | 18 Business Solar Rate BS |
|---|-------|-----------|------------------------|------------------------------------|-------------------------------|--|--|---|----------------------------|------------------------------|
| Allocation Factors | | | | | | | | | | |
| Energy Allocation Factors | | | | | | | | | | |
| Energy Usage by Class | E01 | Energy | | 0.008788 | 0.000306 | 0.000285 | 0.000001 | 0.000002 | - | - |
| Customer Allocation Factors | | | | | | | | | | |
| Primary Distribution Plant -- Average Number of Customers | C01 | Cust08 | | 0.02316 | 0.00004 | 0.00025 | 0.00000 | 0.00002 | - | - |
| Customer Services -- Weighted cost of Services | C02 | | | - | - | - | 0.00000 | - | - | - |
| Meter Costs -- Weighted Cost of Meters | C03 | | | - | 0.00029 | 0.00181 | 0.00002 | - | - | - |
| Lighting Systems -- Lighting Customers | C04 | Cust04 | | 1.00000 | - | - | - | - | - | - |
| Meter Reading and Billing -- Weighted Cost | C05 | Cust05 | | 0.01986 | 0.00004 | 0.00022 | 0.00001 | 0.00004 | - | - |
| Marketing/Economic Development | C06 | Cust06 | | 0.02315 | 0.00004 | 0.00025 | 0.00000 | 0.00002 | - | - |
| Revenue per Billing Determinants | R01 | | | 22,160,940 | 243,959 | 318,742 | 15,468 | 1,533 | 237,096 | 9,936 |
| Energy | | | | 99,001,435 | 3,448,222 | 3,215,713 | 11,550 | 18,250 | - | - |
| Energy (Loss Adjusted) | | Energy | | 105,460,916 | 3,673,206 | 3,425,526 | 12,304 | 19,441 | - | - |
| O&M Customer Allocators | | | | | | | | | | |
| Customers (Monthly Bills) | | | | 1,092,108 | 1,932 | 12,000 | 12 | 120 | - | - |
| Average Customers (Bills/12) | | | | 91,009 | 161 | 1,000 | 1 | 10 | - | - |
| Average Customers (Lighting = Lights) | | | | 91,009 | 161 | 1,000 | 1 | 10 | - | - |
| Weighted Average Customers (Lighting = 9 Lights per Cust) | | Cust05 | | 10,112 | 18 | 111 | 5 | 20 | - | - |
| Street Lighting | | Cust04 | | 91,009 | - | - | - | - | - | - |
| Average Customers | | Cust01 | | 91,009 | 161 | 1,000 | 1 | 10 | - | - |
| Average Customers (Lighting = 9 Lights per Cust) | | Cust06 | | 10,112 | 18 | 111 | 1 | 10 | - | - |
| Average Secondary Customers | | Cust07 | | 10,112 | 18 | 111 | - | 10 | - | - |
| Average Primary Customers | | Cust08 | | 10,112 | 18 | 111 | 1 | 10 | - | - |
| Average Transformer Customers | | Cust09 | | 10,112 | 18 | 111 | 1 | 10 | - | - |
| Plant Customer Allocators | | | | | | | | | | |
| Average Customers | | | | 91,009 | 161 | 1,000 | 1 | 10 | - | - |
| Average Customers (Lighting = 9 Lights) | | | | 9,101 | 16 | 100 | 1 | 10 | - | - |
| Weighted Average Customers | | PCust05 | | 9,101 | 16 | 100 | 5 | 20 | - | - |
| Street Lighting (plant in service balance) | | PCust04 | | 126,670,914 | - | - | - | - | - | - |
| Average Customers | | PCust01 | | 91,009 | 161 | 1,000 | 1 | 10 | - | - |
| Average Customers (Lighting = 9 Lights per Cust) | | PCust06 | | 9,101 | 16 | 100 | 1 | 10 | - | - |
| Average Secondary Customers | | PCust07 | | 9,101 | 16 | 100 | - | 10 | - | - |
| Average Primary Customers | | PCust08 | | 9,101 | 16 | 100 | 1 | 10 | - | - |
| Average Transformer Customers | | PCust09 | | 9,101 | 16 | 100 | 1 | 10 | - | - |
| Demand Allocators | | | | | | | | | | |
| Max Class Non-Coincident Peak Demands (Transmission) | NCPT | | | 24,182 | 842 | 387 | 42 | 4 | - | - |
| Max Class Non-Coincident Peak Demands (Primary) | NCPP | | | 24,182 | 842 | 387 | 42 | 4 | - | - |
| Sum of the Individual Customer Demands (Transformers) | SICDT | | | 24,182 | 842 | 387 | 42 | 4 | - | - |
| Sum of the Individual Customer Demands (Secondary) | SICD | | | 24,182 | 842 | 387 | 42 | 4 | - | - |
| LOLP Demand Allocator | LOLP | | | 317 | 11 | 307 | 1 | 3 | - | - |

LOUISVILLE GAS AND ELECTRIC COMPANY
Cost of Service Study
Class Allocation

Exhibit WSS-32
Page 33 of 38

12 Months Ended
June 30, 2022

| | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | |
|--|-----|------------|-------------------|------------------|---------------------|-------------------------|-----------------|-------------------|------------------|--------------------|-----------------------|---------------------------|
| Description | Ref | Name | Allocation Vector | Total System | Residential Rate RS | General Service Rate GS | Rate PS Primary | Rate PS Secondary | Rate TOD Primary | Rate TOD Secondary | Rate RTS Transmission | Special Contract Customer |
| Allocation Factors (Continued) | | | | | | | | | | | | |
| Production Demand Cost Allocation | | | | | | | | | | | | |
| Gross Plant Production Residual LOLP Demand Allocator | | GPPLLOPDRA | | 1,891,712 | 902,573 | 213,017 | 14,423 | 238,519 | 226,687 | 186,383 | 103,765 | 5,705 |
| Gross Plant Production LOLP Demand Costs | | | | \$ 3,865,573,604 | | | | | | | | |
| Customer Specific Assignment | | | | \$ 2,715,714 | | | | | | | | |
| Gross Plant Production LOLP Demand Residual | | | GPPLLOPDRA | \$ 3,862,857,890 | \$ 1,843,044,295 | \$ 434,979,325 | \$ 29,452,187 | \$ 487,053,951 | \$ 462,893,194 | \$ 380,591,965 | \$ 211,887,495 | \$ 11,650,517 |
| Gross Plant Production LOLP Demand Total | | GPPLLOPDT | | \$ 3,865,573,604 | \$ 1,843,044,295 | \$ 434,979,325 | \$ 29,452,187 | \$ 487,053,951 | \$ 462,893,194 | \$ 380,591,965 | \$ 211,887,495 | \$ 11,650,517 |
| Gross Plant Production LOLP Demand Allocator | | GPLOLPDA | GPPLLOPDT | 1.000000 | 0.47678 | 0.11253 | 0.00762 | 0.12600 | 0.11975 | 0.09846 | 0.05481 | 0.00301 |
| Net Plant Production Residual LOLP Demand Allocator | | NPPLLOPDRA | | 1,891,712 | 902,573 | 213,017 | 14,423 | 238,519 | 226,687 | 186,383 | 103,765 | 5,705 |
| Net Plant Production LOLP Demand Costs | | | | \$ 2,495,383,413 | | | | | | | | |
| Customer Specific Assignment | | | | \$ 2,559,063 | | | | | | | | |
| Net Plant Production LOLP Demand Residual | | | NPPLLOPDRA | \$ 2,492,824,350 | \$ 1,189,374,765 | \$ 280,705,913 | \$ 19,006,428 | \$ 314,311,316 | \$ 298,719,616 | \$ 245,608,030 | \$ 136,737,701 | \$ 7,518,447 |
| Net Plant Production LOLP Demand Total | | NPPLLOPDT | | \$ 2,495,383,413 | \$ 1,189,374,765 | \$ 280,705,913 | \$ 19,006,428 | \$ 314,311,316 | \$ 298,719,616 | \$ 245,608,030 | \$ 136,737,701 | \$ 7,518,447 |
| Net Plant Production LOLP Demand Allocator | | NPLOLPDA | NPPLLOPDT | 1.000000 | 0.47663 | 0.11249 | 0.00762 | 0.12596 | 0.11971 | 0.09842 | 0.05480 | 0.00301 |
| Rate Base Production Residual LOLP Demand Allocator | | RBPLLOPDRA | | 1,891,712 | 902,573 | 213,017 | 14,423 | 238,519 | 226,687 | 186,383 | 103,765 | 5,705 |
| Rate Base Production LOLP Demand Costs | | | | \$ 2,009,588,145 | | | | | | | | |
| Customer Specific Assignment | | | | \$ 2,375,299 | | | | | | | | |
| Rate Base Production LOLP Demand Residual | | | RBPLLOPDRA | \$ 2,007,212,847 | \$ 957,680,114 | \$ 226,023,352 | \$ 15,303,905 | \$ 253,082,297 | \$ 240,527,918 | \$ 197,762,668 | \$ 110,100,685 | \$ 6,053,825 |
| Rate Base Production LOLP Demand Total | | RBPLLOPDT | | \$ 2,009,588,145 | \$ 957,680,114 | \$ 226,023,352 | \$ 15,303,905 | \$ 253,082,297 | \$ 240,527,918 | \$ 197,762,668 | \$ 110,100,685 | \$ 6,053,825 |
| Rate Base Production LOLP Demand Allocator | | RBLLOPDA | RBPLLOPDT | 1.000000 | 0.47656 | 0.11247 | 0.00762 | 0.12594 | 0.11969 | 0.09841 | 0.05479 | 0.00301 |
| Production O&M Residual LOLP Demand Allocator | | POMLOPDRA | | 1,891,712 | 902,573 | 213,017 | 14,423 | 238,519 | 226,687 | 186,383 | 103,765 | 5,705 |
| Production O&M LOLP Demand Costs | | | | \$ 111,958,098 | | | | | | | | |
| Customer Specific Assignment | | | | \$ 71,903 | | | | | | | | |
| Production O&M LOLP Demand Residual | | | POMLOPDRA | \$ 111,886,195 | \$ 53,383,070 | \$ 12,599,009 | \$ 853,071 | \$ 14,107,331 | \$ 13,407,524 | \$ 11,023,700 | \$ 6,137,240 | \$ 337,453 |
| Production O&M LOLP Demand Total | | POMLOPDT | | \$ 111,958,098 | \$ 53,383,070 | \$ 12,599,009 | \$ 853,071 | \$ 14,107,331 | \$ 13,407,524 | \$ 11,023,700 | \$ 6,137,240 | \$ 337,453 |
| Production O&M LOLP Demand Allocator | | POMLOPDA | POMLOPDT | 1.000000 | 0.47681 | 0.11253 | 0.00762 | 0.12601 | 0.11975 | 0.09846 | 0.05482 | 0.00301 |
| Production Depreciation Residual LOLP Demand Allocator | | PDEPLOPDRA | | 1,891,712 | 902,573 | 213,017 | 14,423 | 238,519 | 226,687 | 186,383 | 103,765 | 5,705 |
| Production Depreciation LOLP Demand Costs | | | | \$ 212,733,072 | | | | | | | | |
| Customer Specific Assignment | | | | \$ 87,024 | | | | | | | | |
| Production Depreciation LOLP Demand Residual | | | PDEPLOPDRA | \$ 212,646,048 | \$ 101,457,547 | \$ 23,945,130 | \$ 1,621,310 | \$ 26,811,781 | \$ 25,481,758 | \$ 20,951,166 | \$ 11,664,172 | \$ 641,348 |
| Production Depreciation LOLP Demand Total | | PDEPLOPDT | | \$ 212,733,072 | \$ 101,457,547 | \$ 23,945,130 | \$ 1,621,310 | \$ 26,811,781 | \$ 25,481,758 | \$ 20,951,166 | \$ 11,664,172 | \$ 641,348 |
| Production Depreciation LOLP Demand Allocator | | PDEPLOPDA | PDEPLOPDT | 1.000000 | 0.47692 | 0.11256 | 0.00762 | 0.12603 | 0.11978 | 0.09849 | 0.05483 | 0.00301 |
| Production Prop Tax Residual LOLP Demand Allocator | | PPTLOPDRA | | 1,891,712 | 902,573 | 213,017 | 14,423 | 238,519 | 226,687 | 186,383 | 103,765 | 5,705 |
| Production Prop Tax LOLP Demand Costs | | | | \$ 25,721,711 | | | | | | | | |
| Customer Specific Assignment | | | | \$ 3,301 | | | | | | | | |
| Production Prop Tax LOLP Demand Residual | | | PPTLOPDRA | \$ 25,718,409 | \$ 12,270,751 | \$ 2,896,036 | \$ 196,089 | \$ 3,242,742 | \$ 3,081,883 | \$ 2,533,932 | \$ 1,410,720 | \$ 77,568 |
| Production Prop Tax LOLP Demand Total | | PPTLOPDT | | \$ 25,721,711 | \$ 12,270,751 | \$ 2,896,036 | \$ 196,089 | \$ 3,242,742 | \$ 3,081,883 | \$ 2,533,932 | \$ 1,410,720 | \$ 77,568 |
| Production Prop Tax LOLP Demand Allocator | | PPTLOPDA | PPTLOPDT | 1.000000 | 0.47706 | 0.11259 | 0.00762 | 0.12607 | 0.11982 | 0.09851 | 0.05485 | 0.00302 |
| Production ITC Residual LOLP Demand Allocator | | PITCLOPDRA | | 1,891,712 | 902,573 | 213,017 | 14,423 | 238,519 | 226,687 | 186,383 | 103,765 | 5,705 |
| Production ITC LOLP Demand Costs | | | | \$ (557,122) | | | | | | | | |
| Customer Specific Assignment | | | | \$ (14,127) | | | | | | | | |
| Production ITC LOLP Demand Residual | | | PITCLOPDRA | \$ (542,995) | \$ (259,073) | \$ (61,144) | \$ (4,140) | \$ (68,464) | \$ (65,068) | \$ (53,499) | \$ (29,785) | \$ (1,638) |
| Production ITC LOLP Demand Total | | PITCLOPDT | | \$ (557,122) | \$ (259,073) | \$ (61,144) | \$ (4,140) | \$ (68,464) | \$ (65,068) | \$ (53,499) | \$ (29,785) | \$ (1,638) |
| Production ITC LOLP Demand Allocator | | PITCLOPDA | PITCLOPDT | 1.000000 | 0.46502 | 0.10975 | 0.00743 | 0.12289 | 0.11679 | 0.09603 | 0.05346 | 0.00294 |

LOUISVILLE GAS AND ELECTRIC COMPANY

Cost of Service Study
Class Allocation

12 Months Ended
June 30, 2022

| Description | Ref | 1 Name | 2 Allocation Vector | 12 Street Lighting Rate RLS, LS | 13 Street Lighting Rate LE | 14 Traffic Street Lighting Rate TLE | 15 Outdoor Sports Lighting Rate OSL | 16 Electric Vehicle Charging Rate EV | 17 Solar Share Rate SSP | 18 Business Solar Rate BS |
|--|-----|------------|---------------------------|---------------------------------------|----------------------------------|---|--|---|-------------------------------|---------------------------------|
| Allocation Factors (Continued) | | | | | | | | | | |
| Production Demand Cost Allocation | | | | | | | | | | |
| Gross Plant Production Residual LOLP Demand Allocator | | GPPLLOPDRA | | 317 | 11 | 307 | 1 | 3 | - | - |
| Gross Plant Production LOLP Demand Costs | | | | | | | | | | |
| Customer Specific Assignment | | | | - | - | - | - | - | 2,630,743 | 84,972 |
| Gross Plant Production LOLP Demand Residual | | GPPLLOPDRA | \$ | 646,656 | \$ 22,523 | \$ 627,517 | \$ 1,493 | \$ 6,773 | \$ - | \$ - |
| Gross Plant Production LOLP Demand Total | | GPPLLOPDT | \$ | 646,656 | \$ 22,523 | \$ 627,517 | \$ 1,493 | \$ 6,773 | \$ 2,630,743 | \$ 84,972 |
| Gross Plant Production LOLP Demand Allocator | | GPLOLPDA | | 0.00017 | 0.00001 | 0.00016 | 0.00000 | 0.00000 | 0.00068 | 0.00002 |
| Net Plant Production Residual LOLP Demand Allocator | | NPPLLOPDRA | | 317 | 11 | 307 | 1 | 3 | - | - |
| Net Plant Production LOLP Demand Costs | | | | | | | | | | |
| Customer Specific Assignment | | | | - | - | - | - | - | 2,486,734 | 72,329 |
| Net Plant Production LOLP Demand Residual | | NPPLLOPDRA | \$ | 417,308 | \$ 14,535 | \$ 404,956 | \$ 963 | \$ 4,371 | \$ - | \$ - |
| Net Plant Production LOLP Demand Total | | NPPLLOPDT | \$ | 417,308 | \$ 14,535 | \$ 404,956 | \$ 963 | \$ 4,371 | \$ 2,486,734 | \$ 72,329 |
| Net Plant Production LOLP Demand Allocator | | NPLOLPDA | | 0.00017 | 0.00001 | 0.00016 | 0.00000 | 0.00000 | 0.00100 | 0.00003 |
| Rate Base Production Residual LOLP Demand Allocator | | RBPLLOPDRA | | 317 | 11 | 307 | 1 | 3 | - | - |
| Rate Base Production LOLP Demand Costs | | | | | | | | | | |
| Customer Specific Assignment | | | | - | - | - | - | - | 2,314,622 | 60,677 |
| Rate Base Production LOLP Demand Residual | | RBPLLOPDRA | \$ | 336,015 | \$ 11,703 | \$ 326,069 | \$ 776 | \$ 3,520 | \$ - | \$ - |
| Rate Base Production LOLP Demand Total | | RBPLLOPDT | \$ | 336,015 | \$ 11,703 | \$ 326,069 | \$ 776 | \$ 3,520 | \$ 2,314,622 | \$ 60,677 |
| Rate Base Production LOLP Demand Allocator | | RBLLOPDA | | 0.00017 | 0.00001 | 0.00016 | 0.00000 | 0.00000 | 0.00115 | 0.00003 |
| Production O&M Residual LOLP Demand Allocator | | POMLOPDRA | | 317 | 11 | 307 | 1 | 3 | - | - |
| Production O&M LOLP Demand Costs | | | | | | | | | | |
| Customer Specific Assignment | | | | - | - | - | - | - | 71,903 | - |
| Production O&M LOLP Demand Residual | | POMLOPDRA | \$ | 18,730 | \$ 652 | \$ 18,176 | \$ 43 | \$ 196 | \$ - | \$ - |
| Production O&M LOLP Demand Total | | POMLOPDT | \$ | 18,730 | \$ 652 | \$ 18,176 | \$ 43 | \$ 196 | \$ 71,903 | \$ - |
| Production O&M LOLP Demand Allocator | | POMLOPDA | | 0.00017 | 0.00001 | 0.00016 | 0.00000 | 0.00000 | 0.00064 | - |
| Production Depreciation Residual LOLP Demand Allocator | | PDEPLOPDRA | | 317 | 11 | 307 | 1 | 3 | - | - |
| Production Depreciation LOLP Demand Costs | | | | | | | | | | |
| Customer Specific Assignment | | | | - | - | - | - | - | 83,870 | 3,154 |
| Production Depreciation LOLP Demand Residual | | PDEPLOPDRA | \$ | 35,598 | \$ 1,240 | \$ 34,544 | \$ 82 | \$ 373 | \$ - | \$ - |
| Production Depreciation LOLP Demand Total | | PDEPLOPDT | \$ | 35,598 | \$ 1,240 | \$ 34,544 | \$ 82 | \$ 373 | \$ 83,870 | \$ 3,154 |
| Production Depreciation LOLP Demand Allocator | | PDEPLOPDA | | 0.00017 | 0.00001 | 0.00016 | 0.00000 | 0.00000 | 0.00039 | 0.00001 |
| Production Prop Tax Residual LOLP Demand Allocator | | PPTLOPDRA | | 317 | 11 | 307 | 1 | 3 | - | - |
| Production Prop Tax LOLP Demand Costs | | | | | | | | | | |
| Customer Specific Assignment | | | | - | - | - | - | - | 3,190 | 111 |
| Production Prop Tax LOLP Demand Residual | | PPTLOPDRA | \$ | 4,305 | \$ 150 | \$ 4,178 | \$ 10 | \$ 45 | \$ - | \$ - |
| Production Prop Tax LOLP Demand Total | | PPTLOPDT | \$ | 4,305 | \$ 150 | \$ 4,178 | \$ 10 | \$ 45 | \$ 3,190 | \$ 111 |
| Production Prop Tax LOLP Demand Allocator | | PPTLOPDA | | 0.00017 | 0.00001 | 0.00016 | 0.00000 | 0.00000 | 0.00012 | 0.00000 |
| Production ITC Residual LOLP Demand Allocator | | PITCLOPDRA | | 317 | 11 | 307 | 1 | 3 | - | - |
| Production ITC LOLP Demand Costs | | | | | | | | | | |
| Customer Specific Assignment | | | | - | - | - | - | - | (13,728) | (399) |
| Production ITC LOLP Demand Residual | | PITCLOPDRA | \$ | (91) | \$ (3) | \$ (88) | \$ (0) | \$ (1) | \$ - | \$ - |
| Production ITC LOLP Demand Total | | PITCLOPDT | \$ | (91) | \$ (3) | \$ (88) | \$ (0) | \$ (1) | \$ (13,728) | \$ (399) |
| Production ITC LOLP Demand Allocator | | PITCLOPDA | | 0.00016 | 0.00001 | 0.00016 | 0.00000 | 0.00000 | 0.02464 | 0.00072 |

LOUISVILLE GAS AND ELECTRIC COMPANY
Cost of Service Study
Class Allocation

12 Months Ended
June 30, 2022

| Description | 1 Ref | 2 Name | 3 Allocation Vector | 4 Total System | 5 Residential Rate RS | 6 General Service Rate GS | 7 Rate PS Primary | 8 Rate PS Secondary | 9 Rate TOD Primary | 10 Rate TOD Secondary | 11 Rate RTS Transmission | 12 Special Contract Customer |
|---|----------|-----------|------------------------|-------------------|--------------------------|------------------------------|----------------------|------------------------|-----------------------|--------------------------|-----------------------------|---------------------------------|
| Meter Cost Allocation | | | | | | | | | | | | |
| Meters Gross Plant Residual Allocator | | MGPRA | | 38,550,020 | 26,350,722 | 8,187,269 | 267,611 | 2,289,550 | 534,525 | 452,630 | 377,746 | 8,124 |
| Meters Gross Plant Costs | | | | \$ 44,815,612 | | | | | | | | |
| Customer Specific Assignment | | | | \$ 183,388 | | - | - | - | - | - | - | - |
| Meters Gross Plant Residual | | | MGPRA | \$ 44,632,225 | \$ 30,508,190 | \$ 9,479,010 | \$ 309,833 | \$ 2,650,782 | \$ 618,860 | \$ 524,043 | \$ 437,345 | \$ 9,406 |
| Meters Gross Plant Total | | MGPT | | \$ 44,815,612 | \$ 30,508,190 | \$ 9,479,010 | \$ 309,833 | \$ 2,650,782 | \$ 618,860 | \$ 524,043 | \$ 437,345 | \$ 9,406 |
| Meters Gross Plant Allocator | | MGPA | MGPT | 1.000000 | 0.68075 | 0.21151 | 0.00691 | 0.05915 | 0.01381 | 0.01169 | 0.00976 | 0.00021 |
| Meters Net Plant Residual Allocator | | MNPRA | | 38,550,020 | 26,350,722 | 8,187,269 | 267,611 | 2,289,550 | 534,525 | 452,630 | 377,746 | 8,124 |
| Meters Net Plant Costs | | | | \$ 30,149,962 | | | | | | | | |
| Customer Specific Assignment | | | | \$ 139,194 | | - | - | - | - | - | - | - |
| Meters Net Plant Residual | | | MNPRA | \$ 30,010,768 | \$ 20,513,748 | \$ 6,373,699 | \$ 208,332 | \$ 1,782,389 | \$ 416,122 | \$ 352,367 | \$ 294,071 | \$ 6,324 |
| Meters Net Plant Total | | MNPT | | \$ 30,149,962 | \$ 20,513,748 | \$ 6,373,699 | \$ 208,332 | \$ 1,782,389 | \$ 416,122 | \$ 352,367 | \$ 294,071 | \$ 6,324 |
| Meters Net Plant Allocator | | MNPA | MNPT | 1.000000 | 0.68039 | 0.21140 | 0.00691 | 0.05912 | 0.01380 | 0.01169 | 0.00975 | 0.00021 |
| Meters Rate Base Residual Allocator | | MRBRA | | 38,550,020 | 26,350,722 | 8,187,269 | 267,611 | 2,289,550 | 534,525 | 452,630 | 377,746 | 8,124 |
| Meters Rate Base Costs | | | | \$ 26,834,745 | | | | | | | | |
| Customer Specific Assignment | | | | \$ 105,259 | | - | - | - | - | - | - | - |
| Meters Rate Base Residual | | | MRBRA | \$ 26,729,486 | \$ 18,270,840 | \$ 5,676,819 | \$ 185,554 | \$ 1,587,509 | \$ 370,625 | \$ 313,841 | \$ 261,918 | \$ 5,633 |
| Meters Rate Base Total | | MRBT | | \$ 26,834,745 | \$ 18,270,840 | \$ 5,676,819 | \$ 185,554 | \$ 1,587,509 | \$ 370,625 | \$ 313,841 | \$ 261,918 | \$ 5,633 |
| Meters Rate Base Allocator | | MRBA | MRBT | 1.000000 | 0.68087 | 0.21155 | 0.00691 | 0.05916 | 0.01381 | 0.01170 | 0.00976 | 0.00021 |
| Meters O&M Residual Allocator | | MOMRA | | 38,550,020 | 26,350,722 | 8,187,269 | 267,611 | 2,289,550 | 534,525 | 452,630 | 377,746 | 8,124 |
| Meters O&M Costs | | | | \$ 13,918,315 | | | | | | | | |
| Customer Specific Assignment | | | | \$ - | | - | - | - | - | - | - | - |
| Meters O&M Residual | | | MOMRA | \$ 13,918,315 | \$ 9,513,812 | \$ 2,955,978 | \$ 96,620 | \$ 826,632 | \$ 192,988 | \$ 163,420 | \$ 136,384 | \$ 2,933 |
| Meters O&M Total | | MOMT | | \$ 13,918,315 | \$ 9,513,812 | \$ 2,955,978 | \$ 96,620 | \$ 826,632 | \$ 192,988 | \$ 163,420 | \$ 136,384 | \$ 2,933 |
| Meters O&M Allocator | | MOMA | MOMT | 1.000000 | 0.68355 | 0.21238 | 0.00694 | 0.05939 | 0.01387 | 0.01174 | 0.00980 | 0.00021 |
| Meters Depreciation Residual Allocator | | MDRA | | 38,550,020 | 26,350,722 | 8,187,269 | 267,611 | 2,289,550 | 534,525 | 452,630 | 377,746 | 8,124 |
| Meters Depreciation Costs | | | | \$ 1,184,751 | | | | | | | | |
| Customer Specific Assignment | | | | \$ 18,339 | | - | - | - | - | - | - | - |
| Meters Depreciation Residual | | | MDRA | \$ 1,166,412 | \$ 797,297 | \$ 247,723 | \$ 8,097 | \$ 69,275 | \$ 16,173 | \$ 13,695 | \$ 11,430 | \$ 246 |
| Meters Depreciation Total | | MDT | | \$ 1,184,751 | \$ 797,297 | \$ 247,723 | \$ 8,097 | \$ 69,275 | \$ 16,173 | \$ 13,695 | \$ 11,430 | \$ 246 |
| Meters Depreciation Allocator | | MDA | MDT | 1.000000 | 0.67297 | 0.20909 | 0.00683 | 0.05847 | 0.01365 | 0.01156 | 0.00965 | 0.00021 |
| Meters Prop Tax Residual Allocator | | MPTRA | | 38,550,020 | 26,350,722 | 8,187,269 | 267,611 | 2,289,550 | 534,525 | 452,630 | 377,746 | 8,124 |
| Meters Prop Tax Costs | | | | \$ 298,205 | | | | | | | | |
| Customer Specific Assignment | | | | \$ 2,689 | | - | - | - | - | - | - | - |
| Meters Prop Tax Residual | | | MPTRA | \$ 295,516 | \$ 201,999 | \$ 62,762 | \$ 2,051 | \$ 17,551 | \$ 4,098 | \$ 3,470 | \$ 2,896 | \$ 62 |
| Meters Prop Tax Total | | MPTT | | \$ 298,205 | \$ 201,999 | \$ 62,762 | \$ 2,051 | \$ 17,551 | \$ 4,098 | \$ 3,470 | \$ 2,896 | \$ 62 |
| Meters Prop Tax Allocator | | MPTA | MPTT | 1.000000 | 0.67738 | 0.21046 | 0.00688 | 0.05886 | 0.01374 | 0.01164 | 0.00971 | 0.00021 |
| Customer Service O&M Cost Allocation | | | | | | | | | | | | |
| Customer Service Residual Allocator | | CSRA | | 436,714 | 377,599 | 45,359 | 70 | 2,782 | 132 | 505 | 13 | 2 |
| Customer Service O&M Costs | | | | \$ 4,888,693 | | | | | | | | |
| Customer Specific Assignment | | | | \$ 34,000 | | | | | | | | |
| Customer Service O&M Residual | | | CSRA | \$ 4,854,693 | \$ 4,197,542 | \$ 504,233 | \$ 778 | \$ 30,930 | \$ 1,463 | \$ 5,614 | \$ 145 | \$ 22 |
| Customer Service O&M Total | | CSOT | | \$ 4,888,693 | \$ 4,197,542 | \$ 504,233 | \$ 778 | \$ 30,930 | \$ 1,463 | \$ 5,614 | \$ 145 | \$ 22 |
| Customer Service O&M Allocator | | C10 | CSOT | 1.000000 | 0.85862 | 0.10314 | 0.00016 | 0.00633 | 0.00030 | 0.00115 | 0.00003 | 0.00000 |

LOUISVILLE GAS AND ELECTRIC COMPANY
Cost of Service Study
Class Allocation

12 Months Ended
June 30, 2022

| Description | 1 Ref | 2 Name | 3 Allocation Vector | 12 Street Lighting Rate RLS, LS | 13 Street Lighting Rate LE | 14 Traffic Street Lighting Rate TLE | 15 Outdoor Sports Lighting Rate OSL | 16 Electric Vehicle Charging Rate EV | 17 Solar Share Rate SSP | 18 Business Solar Rate BS |
|--|----------|-----------|------------------------|------------------------------------|-------------------------------|--|--|---|----------------------------|------------------------------|
| <u>Meter Cost Allocation</u> | | | | | | | | | | |
| Meters Gross Plant Residual Allocator | | MGPRA | | - | 11,235 | 69,785 | 823 | - | - | - |
| Meters Gross Plant Costs | | | | | | | | | | |
| Customer Specific Assignment | | | | - | - | | | \$183,388 | | |
| Meters Gross Plant Residual | | MGPRA | | \$ - | \$ 13,008 | \$ 80,795 | \$ 953 | \$ - | \$ - | \$ - |
| Meters Gross Plant Total | | MGPT | | \$ - | \$ 13,008 | \$ 80,795 | \$ 953 | \$ 183,388 | \$ - | \$ - |
| Meters Gross Plant Allocator | | MGPA | | - | 0.00029 | 0.00180 | 0.00002 | 0.00409 | - | - |
| Meters Net Plant Residual Allocator | | MNPRA | | - | 11,235 | 69,785 | 823 | - | - | - |
| Meters Net Plant Costs | | | | | | | | | | |
| Customer Specific Assignment | | | | - | - | | | \$139,194 | | |
| Meters Net Plant Residual | | MNPRA | | \$ - | \$ 8,747 | \$ 54,327 | \$ 641 | \$ - | \$ - | \$ - |
| Meters Net Plant Total | | MNPT | | \$ - | \$ 8,747 | \$ 54,327 | \$ 641 | \$ 139,194 | \$ - | \$ - |
| Meters Net Plant Allocator | | MNPA | | - | 0.00029 | 0.00180 | 0.00002 | 0.00462 | - | - |
| Meters Rate Base Residual Allocator | | MRBRA | | - | 11,235 | 69,785 | 823 | - | - | - |
| Meters Rate Base Costs | | | | | | | | | | |
| Customer Specific Assignment | | | | - | - | | | \$105,259 | | |
| Meters Rate Base Residual | | MRBRA | | \$ - | \$ 7,790 | \$ 48,387 | \$ 571 | \$ - | \$ - | \$ - |
| Meters Rate Base Total | | MRBT | | \$ - | \$ 7,790 | \$ 48,387 | \$ 571 | \$ 105,259 | \$ - | \$ - |
| Meters Rate Base Allocator | | MRBA | | - | 0.00029 | 0.00180 | 0.00002 | 0.00392 | - | - |
| Meters O&M Residual Allocator | | MOMRA | | - | 11,235 | 69,785 | 823 | - | - | - |
| Meters O&M Costs | | | | | | | | | | |
| Customer Specific Assignment | | | | - | - | | | \$0 | | |
| Meters O&M Residual | | MOMRA | | \$ - | \$ 4,056 | \$ 25,196 | \$ 297 | \$ - | \$ - | \$ - |
| Meters O&M Total | | MOMT | | \$ - | \$ 4,056 | \$ 25,196 | \$ 297 | \$ - | \$ - | \$ - |
| Meters O&M Allocator | | MOMA | | - | 0.00029 | 0.00181 | 0.00002 | - | - | - |
| Meters Depreciation Residual Allocator | | MDRA | | - | 11,235 | 69,785 | 823 | - | - | - |
| Meters Depreciation Costs | | | | | | | | | | |
| Customer Specific Assignment | | | | - | - | | | \$18,339 | | |
| Meters Depreciation Residual | | MDRA | | \$ - | \$ 340 | \$ 2,111 | \$ 25 | \$ - | \$ - | \$ - |
| Meters Depreciation Total | | MDT | | \$ - | \$ 340 | \$ 2,111 | \$ 25 | \$ 18,339 | \$ - | \$ - |
| Meters Depreciation Allocator | | MDA | | - | 0.00029 | 0.00178 | 0.00002 | 0.01548 | - | - |
| Meters Prop Tax Residual Allocator | | MPTRA | | - | 11,235 | 69,785 | 823 | - | - | - |
| Meters Prop Tax Costs | | | | | | | | | | |
| Customer Specific Assignment | | | | - | - | | | \$2,689 | | |
| Meters Prop Tax Residual | | MPTRA | | \$ - | \$ 86 | \$ 535 | \$ 6 | \$ - | \$ - | \$ - |
| Meters Prop Tax Total | | MPTT | | \$ - | \$ 86 | \$ 535 | \$ 6 | \$ 2,689 | \$ - | \$ - |
| Meters Prop Tax Allocator | | MPTA | | - | 0.00029 | 0.00179 | 0.00002 | 0.00902 | - | - |
| <u>Customer Service O&M Cost Allocation</u> | | | | | | | | | | |
| Customer Service Residual Allocator | | CSRA | | 10,112 | 18 | 111 | 1 | 10 | - | - |
| Customer Service O&M Costs | | | | | | | | | | |
| Customer Specific Assignment | | | | - | - | | | \$24,000 | \$ - | \$10,000 |
| Customer Service O&M Residual | | CSRA | | \$ 112,410 | \$ 199 | \$ 1,235 | \$ 11 | \$ 111 | \$ - | \$ - |
| Customer Service O&M Total | | CSOT | | \$ 112,410 | \$ 199 | \$ 1,235 | \$ 11 | \$ 24,111 | \$ - | \$ 10,000 |
| Customer Service O&M Allocator | | C10 | | 0.02299 | 0.00004 | 0.00025 | 0.00000 | 0.00493 | - | 0.00205 |

LOUISVILLE GAS AND ELECTRIC COMPANY
Cost of Service Study
Class Allocation

12 Months Ended
June 30, 2022

| | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | |
|---|-----|--------|-------------------|---------------|---------------------|-------------------------|-----------------|-------------------|------------------|--------------------|-----------------------|---------------------------|
| Description | Ref | Name | Allocation Vector | Total System | Residential Rate RS | General Service Rate GS | Rate PS Primary | Rate PS Secondary | Rate TOD Primary | Rate TOD Secondary | Rate RTS Transmission | Special Contract Customer |
| Revenue Adjustment Allocators | | | | | | | | | | | | |
| Forfeited Discounts | | FDIS | | 2,707,235 | 2,147,670 | 209,067 | 7,006 | 278,476 | 13,171 | 50,543 | 1,301 | - |
| Misc Service Revenue Allocator | | MISCR | | 1,837,730 | 1,753,541 | 69,649 | 291 | 11,552 | 546 | 2,097 | 54 | - |
| Rent From Electric Property | | RFEP | | 3,457,582,001 | 1,830,420,621 | 383,935,310 | 21,476,777 | 369,390,342 | 328,714,071 | 283,566,435 | 135,862,169 | 8,795,357 |
| Other Electric Revenue | | OER | | 3,457,582,001 | 1,830,420,621 | 383,935,310 | 21,476,777 | 369,390,342 | 328,714,071 | 283,566,435 | 135,862,169 | 8,795,357 |
| Expense Adjustment Allocators | | | | | | | | | | | | |
| Interruptible Credit Allocator (Prod Plant) | | INTCRE | | 3,862,851,117 | 1,843,044,295 | 434,979,325 | 29,452,187 | 487,053,951 | 462,893,194 | 380,591,965 | 211,887,495 | 11,650,517 |
| O&M less fuel | | OMLF | | 245,941,143 | 140,658,266 | 30,381,048 | 1,401,213 | 23,637,517 | 19,892,195 | 17,681,383 | 8,122,963 | 535,746 |
| Base Rate Revenue at Current Rates | | | | 1,066,653,012 | 431,824,736 | 148,100,588 | 10,054,862 | 147,448,878 | 136,688,085 | 101,626,163 | 64,266,867 | 3,635,160 |
| CSR Avoided Cost | | | | | | | | | | | | |
| Interruptible Demands | | | | 433,038 | | | | | 38,819 | | 394,219 | |
| Avoided Cost per kW | | | | | | | | | 3.67 | | 5.90 | |
| Avoided Cost | | | | 2,468,360 | | | | | 142,467 | | 2,325,893 | |

LOUISVILLE GAS AND ELECTRIC COMPANY
 Cost of Service Study
 Class Allocation

12 Months Ended
 June 30, 2022

| Description | 1 | 2 | 12 | 13 | 14 | 15 | 16 | 17 | 18 |
|--------------------------------------|--------|-------------------|------------------------------|-------------------------|----------------------------------|----------------------------------|-----------------------------------|----------------------|------------------------|
| Ref | Name | Allocation Vector | Street Lighting Rate RLS, LS | Street Lighting Rate LE | Traffic Street Lighting Rate TLE | Outdoor Sports Lighting Rate OSL | Electric Vehicle Charging Rate EV | Solar Share Rate SSP | Business Solar Rate BS |
| Revenue Adjustment Allocators | | | | | | | | | |
| | FDIS | | 1 | - | - | - | - | - | - |
| | MISCR | | - | - | - | - | - | - | - |
| | RFEP | | 94,529,248 | 277,529 | 600,893 | 13,251 | - | - | - |
| | OER | | 94,529,248 | 277,529 | 600,893 | 13,251 | - | - | - |
| Expense Adjustment Allocators | | | | | | | | | |
| | INTCRE | | 646,656 | 22,523 | 627,517 | 1,493 | - | - | - |
| | OMLF | | 3,432,486 | 24,045 | 64,948 | 1,479 | 25,952 | 71,903 | 10,000.00 |
| | | | 22,160,940 | 243,959 | 318,742 | 15,468 | 1,533 | 237,096 | 9,936 |
| CSR Avoided Cost | | | | | | | | | |
| Interruptible Demands | | | | | | | | | |
| Avoided Cost per kW | | | | | | | | | |
| Avoided Cost | | | | | | | | | |

Exhibit WSS-33

Gas Transmission Plant Functional Assignment for the Cost of Service Study (Louisville Gas and Electric Company)

| | | |
|--|----|-------------------|
| Account 367 Balance from July 2020 | \$ | 55,544,383 |
| Engineering Estimate of Storage Related Transmission as of July 2020 | \$ | 64,813,109 |
| Amount Included in Account 353 | \$ | <u>27,166,984</u> |
| Storage Related Transmission Included in Account 367 | \$ | 37,646,125 |
| Additional Storage Related Transmission Investment Included in Account 367 June 2022 Balance | \$ | <u>35,597,685</u> |
| Estimated Storage Related Transmission Included in Account 367 June 2022 Balance | \$ | 73,243,810 |
| Account 367 Forecasted Balance June 2022 | \$ | 242,931,122 |
| Percent of Account 367 Forecasted Balance as of June 2022 Related to Storage | | 30.15% |
| Percent of Account 367 Forecasted Balance as of June 2022 Not Related to Storage | | 69.85% |
| Total | | |

Exhibit WSS-34

Zero Intercept Analysis of
Distribution Mains

(Louisville Gas and Electric Company)

Louisville Gas and Electric Company
Zero Intercept Distribution Mains

| Type of Main | Pipe Size | Net Cost of Plant | Quantity | Avg Cost | n | y | x | est y | y^n^5 | n^5 | xn^5 |
|---------------------------|-----------|-------------------|-----------|-------------|-----------|-----------|-------|--------|--------|----------|------------|
| PIPE, CAST IRON, 10 | 10 | 77,658.52 | 45,547 | 1.70501943 | 45,547 | 1.70502 | 10.00 | 24.776 | 363.88 | 213.42 | 2134.17431 |
| PIPE, CAST IRON, 12 | 12 | 66,566.15 | 31,106 | 2.139977818 | 31,106 | 2.13998 | 12.00 | 27.549 | 377.43 | 176.37 | 2116.42718 |
| PIPE, CAST IRON, 14 | 14 | 21,255.50 | 7,950 | 2.673647799 | 7,950 | 2.67365 | 14.00 | 30.322 | 238.39 | 89.16 | 1248.27882 |
| PIPE, CAST IRON, 16 | 16 | 90,103.45 | 28,376 | 3.175340076 | 28,376 | 3.17534 | 16.00 | 33.095 | 534.89 | 168.45 | 2695.22838 |
| PIPE, CAST IRON, 18 | 18 | 34,815.59 | 8,985 | 3.874856984 | 8,985 | 3.87486 | 18.00 | 35.868 | 367.29 | 94.79 | 1706.20632 |
| PIPE, CAST IRON, 24 | 24 | 6,523.65 | 1,220 | 5.347254098 | 1,220 | 5.34725 | 24.00 | 44.186 | 186.77 | 34.93 | 838.283961 |
| PIPE, CAST IRON, 4 | 4 | 232,011.34 | 284,533 | 0.815411007 | 284,533 | 0.81541 | 4.00 | 16.457 | 434.95 | 533.42 | 2133.66539 |
| PIPE, CAST IRON, 6 | 6 | 30,092.75 | 29,657 | 1.01469299 | 29,657 | 1.01469 | 6.00 | 19.230 | 174.74 | 172.21 | 1033.27247 |
| PIPE, CAST IRON, 8 | 8 | 38,666.69 | 27,960 | 1.382928827 | 27,960 | 1.38293 | 8.00 | 22.003 | 231.24 | 167.21 | 1337.69952 |
| PIPE, PLASTIC, 1 | 1 | 71,808.18 | 3,000 | 23.93606 | 3,000 | 23.93606 | 1.00 | 12.298 | 1311 | 54.77 | 54.7722558 |
| PIPE, PLASTIC, 2 | 2 | 147,496,076.13 | 8,888,931 | 16.59322995 | 8,888,931 | 16.59323 | 2.00 | 13.684 | 49472 | 2,981.43 | 5962.86206 |
| PIPE, PLASTIC, 4 | 4 | 106,786,944.81 | 4,014,837 | 26.59807728 | 4,014,837 | 26.59808 | 4.00 | 16.457 | 53295 | 2,003.71 | 8014.82327 |
| PIPE, PLASTIC, 6 | 6 | 39,493,513.89 | 878,431 | 44.95915318 | 878,431 | 44.95915 | 6.00 | 19.230 | 42138 | 937.25 | 5623.47899 |
| PIPE, PLASTIC, 8 | 8 | 25,702,840.01 | 290,920 | 88.3501994 | 290,920 | 88.35020 | 8.00 | 22.003 | 47653 | 539.37 | 4314.96002 |
| PIPE, PLASTIC, 10 | 10 | 19,616.26 | 46 | 426.4404348 | 46 | 426.44043 | 10.00 | 24.776 | 2892.3 | 6.78 | 67.8232998 |
| PIPE, STEEL, 1 | 1 | 1,792,624.37 | 72,839 | 24.61077678 | 72,839 | 24.61078 | 1.00 | 12.298 | 6642.1 | 269.89 | 269.887013 |
| PIPE, STEEL, 1 1/2 | 1.5 | 25,393.20 | 652 | 38.94662577 | 652 | 38.94663 | 1.50 | 12.991 | 994.47 | 25.53 | 38.301436 |
| PIPE, STEEL, 1 1/4 | 1.25 | 11,352.19 | 403 | 28.16920596 | 403 | 28.16921 | 1.25 | 12.645 | 565.49 | 20.07 | 25.0935749 |
| PIPE, STEEL, 10 | 10 | 92,683.96 | 5,185 | 17.87540212 | 5,185 | 17.87540 | 10.00 | 24.776 | 1287.2 | 72.01 | 720.069441 |
| PIPE, STEEL, 12 | 12 | 14,656,557.38 | 521,083 | 28.12710716 | 521,083 | 28.12711 | 12.00 | 27.549 | 20304 | 721.86 | 8662.32948 |
| PIPE, STEEL, 16 | 16 | 8,006,093.90 | 257,321 | 31.11325504 | 257,321 | 31.11326 | 16.00 | 33.095 | 15783 | 507.27 | 8116.29078 |
| PIPE, STEEL, 2 | 2 | 18,128,004.78 | 4,099,373 | 4.422140844 | 4,099,373 | 4.42214 | 2.00 | 13.684 | 8953.5 | 2,024.69 | 4049.38168 |
| PIPE, STEEL, 2 1/2 | 2.5 | 9,087.67 | 480 | 18.93264583 | 480 | 18.93265 | 2.50 | 14.378 | 414.79 | 21.91 | 54.7722558 |
| PIPE, STEEL, 20 | 20 | 4,002,792.28 | 154,201 | 25.95827705 | 154,201 | 25.95828 | 20.00 | 38.641 | 10193 | 392.68 | 7853.68703 |
| PIPE, STEEL, 22 | 22 | 56,616.99 | 3,497 | 16.19016014 | 3,497 | 16.19016 | 22.00 | 41.413 | 957.41 | 59.14 | 1300.97963 |
| PIPE, STEEL, 24 | 24 | 122,746.10 | 871 | 140.9254879 | 871 | 140.92549 | 24.00 | 44.186 | 4159.1 | 29.51 | 708.305019 |
| PIPE, STEEL, 4 | 4 | 38,014,082.75 | 4,721,852 | 8.050672226 | 4,721,852 | 8.05067 | 4.00 | 16.457 | 17494 | 2,172.98 | 8691.92913 |
| PIPE, STEEL, 6 | 6 | 11,373,827.64 | 825,294 | 13.7815465 | 825,294 | 13.78155 | 6.00 | 19.230 | 12520 | 908.46 | 5450.7416 |
| PIPE, STEEL, 8 | 8 | 30,776,488.82 | 1,967,573 | 15.6418536 | 1,967,573 | 15.64185 | 8.00 | 22.003 | 21941 | 1,402.70 | 11221.6163 |
| PIPE, WROUGHT IRON, 1 1/2 | 1.5 | 906.81 | 2,276 | 0.398422671 | 2,276 | 0.39842 | 1.50 | 12.991 | 19.008 | 47.71 | 71.5611627 |
| PIPE, WROUGHT IRON, 1 1/4 | 1.25 | 3,455.93 | 8,636 | 0.400177165 | 8,636 | 0.40018 | 1.25 | 12.645 | 37.188 | 92.93 | 116.162602 |
| PIPE, WROUGHT IRON, 10 | 10 | 49,167.84 | 26,553 | 1.851686815 | 26,553 | 1.85169 | 10.00 | 24.776 | 301.73 | 162.95 | 1629.50913 |
| PIPE, WROUGHT IRON, 12 | 12 | 14,816.90 | 5,786 | 2.560819219 | 5,786 | 2.56082 | 12.00 | 27.549 | 194.79 | 76.07 | 912.789132 |
| PIPE, WROUGHT IRON, 16 | 16 | 46,942.53 | 14,045 | 3.342294767 | 14,045 | 3.34229 | 16.00 | 33.095 | 396.1 | 118.51 | 1896.18564 |
| PIPE, WROUGHT IRON, 2 | 2 | 1,268.21 | 3,617 | 0.350624827 | 3,617 | 0.35062 | 2.00 | 13.684 | 21.087 | 60.14 | 120.283 |
| PIPE, WROUGHT IRON, 3 | 3 | 1,348.82 | 2,388 | 0.564832496 | 2,388 | 0.56483 | 3.00 | 15.071 | 27.602 | 48.87 | 146.601501 |
| PIPE, WROUGHT IRON, 4 | 4 | 43,896.76 | 39,947 | 1.098875009 | 39,947 | 1.09888 | 4.00 | 16.457 | 219.63 | 199.87 | 799.469824 |
| PIPE, WROUGHT IRON, 8 | 8 | 120,947.42 | 85,164 | 1.420170729 | 85,164 | 1.42017 | 8.00 | 22.003 | 414.45 | 291.83 | 2334.62974 |

Weighted Linear Regression Statistics

| | Estimate | Standard Error | LINEST Array | |
|--------------------------------|------------|-------------------|--------------|-------------|
| | | | 1.386452713 | 10.91149336 |
| Size Coefficient (\$ per Foot) | 1.3864527 | 0.6555649 | 0.655564862 | 3.183258346 |
| Zero Intercept (\$ per Foot) | 10.9114934 | 3.1832583 | 0.691792497 | 9792.588193 |
| | | | 40.40221228 | 36 |
| R-Square | 69.18% | | 7748722800 | 3452212207 |

Plant Classification

| | | |
|------------------------------|----|--------------|
| Total All Distribution Mains | | 27,360,535 |
| Zero Intercept | | 10,911,493.4 |
| Zero Intercept Cost | \$ | 298,544,296 |
| Total Cost of Sample | \$ | 447,519,596 |
| Customer Percentage of Total | | 66.71% |

**Louisville Gas and Electric Company
Zero Intercept Distribution Mains**

| Nominal Size (in inches) | Total Distribution Mains | | | High Pressure Mains | | | Low and Medium Pressure Mains | |
|--------------------------------|--|-----------------------|---------------|---------------------|--------------------|----------------------|----------------------------------|-----------------------|
| | Feet of Pipe | Installed Costs | Unit Costs | Feet of Pipe | Installed Costs | Feet of Pipe | Installed Costs | |
| | | | | Category II 1" | 0 | | | |
| 1 | 75,839 | 1,864,433 | 24.5841 | Category III 1" | 2,806 | | | |
| | | | | | 2,806 | 68,986 | 73,033 | 1,795,447 |
| 1.25 | 9,039 | 14,808 | 1.6382 | | 0 | 0 | 9,039 | 14,808 |
| 1.5 | 2,928 | 26,300 | 8.9822 | | 0 | 0 | 2,928 | 26,300 |
| | | | | Category II 2" | 0 | | | |
| 2 | 12,991,921 | 165,625,349 | 12.7483 | Category III 2" | 63,404 | | | |
| | | | | | 63,404 | 808,294 | 12,928,517 | 164,817,055 |
| 2.5 | 480 | 9,088 | 18.9326 | | 0 | 0 | 480 | 9,088 |
| 3 | 2,388 | 1,349 | 0.5648 | Category II 3" | 104 | 59 | 2,284 | 1,290 |
| | | | | Category II 4" | 0 | | | |
| 4 | 9,061,169 | 145,076,936 | 16.0108 | Category III 4" | 430,844 | | | |
| | | | | | 430,844 | 6,898,167 | 8,630,325 | 138,178,769 |
| | | | | Category II 6" | 0 | | | |
| 6 | 1,733,382 | 50,897,434 | 29.3631 | Category III 6" | 150,219 | | | |
| | | | | | 150,219 | 4,410,904 | 1,583,163 | 46,486,530 |
| | | | | Category II 8" | 0 | | | |
| 8 | 2,371,617 | 56,638,943 | 23.8820 | Category III 8" | 554,720 | | | |
| | | | | | 554,720 | 13,247,824 | 1,816,897 | 43,391,119 |
| 10 | 77,331 | 239,127 | 3.0922 | Category II 10" | 268 | 830 | 77,063 | 238,297 |
| | | | | Category II 12" | 0 | | | |
| 12 | 557,975 | 14,737,940 | 26.4133 | Category III 12" | 351,421 | | | |
| | | | | | 351,421 | 9,282,182 | 206,554 | 5,455,758 |
| 14 | 7,950 | 21,256 | 2.6736 | | 0 | 0 | 7,950 | 21,256 |
| 16 | 299,742 | 8,143,140 | 27.1672 | Category II 16" | 191,692 | 5,207,740 | 108,050 | 2,935,400 |
| 18 | 8,985 | 34,816 | 3.8749 | | 0 | 0 | 8,985 | 34,816 |
| | | | | Category II 20" | 0 | | | |
| 20 | 154,201 | 4,002,792 | 25.9583 | Category III 20" | 72,502 | | | |
| | | | | | 72,502 | 1,882,028 | 81,699 | 2,120,764 |
| 22 | 3,497 | 56,617 | 16.1902 | Category II 22" | 3,497 | 56,622 | 0 | -5 |
| 24 | 2,091 | 129,270 | 61.8220 | Category II 24" | 942 | 58,236 | 1,149 | 71,034 |
| Total All Mains | 27,360,535 | \$ 447,519,596 | | | 1,822,421 | \$ 41,921,872 | 25,538,114 | \$ 405,597,724 |
| Zero Intercept | | \$ 10,911 | | | | \$ 10,911 | | \$ 10,911 |
| Customer-Related Costs* | | \$ 298,544,296 | | | | \$ 19,885,332 | | \$ 278,658,964 |
| Portion of Total | | 66.71% | | | | 4.44% | | 62.27% |
| Demand-Related Costs** | | \$ 148,975,300 | | | | \$ 22,036,540 | | \$ 126,938,761 |
| Portion of Total | | 33.29% | | | | 4.92% | | 28.36% |
| Notes: | | | | | | 9.37% | | 90.63% |
| * | Customer-Related Costs calculated by applying the zero intercept unit cost of \$7.7583297 to total feet of pipe. | | | | | 9.37% | | |
| ** | Demand-Related Costs equal Total All Distribution Mains less Customer-Related Costs | | | | | | | |

Exhibit WSS-35

Analysis of Low-, Medium-, and High-
Pressure Distribution Mains for the
Cost of Service Study
(Louisville Gas and Electric Company)

Louisville Gas and Electric Company

Allocation of High Pressure and Low/Medium Pressure Mains
12 Months Ended February 2020

Exhibit WSS-35

Page 1 of 2

| | Residential Rate RGS | Commercial Rate CGS | Industrial Rate IGS | Rate AAGS | IntraCompany | Rate FT (1) | Total |
|--|-------------------------|------------------------|------------------------|-----------|--------------|-------------|------------|
| Actual | | | | | | | |
| Total Mcf Sales and Transportation | 17,994,912 | 9,880,285 | 1,523,000 | 326,085 | 246,837 | 13,791,319 | 43,762,438 |
| Non-Temp. Sensitive Sales & Transportation - Jul. & Aug. | 640,087 | 525,363 | 183,067 | 32,292 | 27,294 | 1,638,503 | 3,046,606 |
| Annualized Non-Temperature Sensitive Sales & Transport. | 3,840,523 | 3,152,175 | 1,098,400 | 193,753 | 163,765 | 9,831,019 | 18,279,635 |
| Non-Temperature Sensitive Sales & Transportation per Day | 10,522 | 8,636 | 3,009 | 531 | 449 | 26,934 | 50,081 |
| Temperature Sensitive Sales & Transportation | 14,154,388 | 6,728,110 | 424,600 | 132,332 | - | 3,960,300 | 25,482,803 |
| Degree Days | 3,585 | 3,585 | 3,677 | 3,677 | 3,677 | 3,677 | |
| Temperature Sensitive Sales & Transportation per Degree Day | 3,949 | 1,877 | 115 | 36 | - | 1,077 | 7,054 |
| Calculated Daily Customer Deliveries (Demands) @ -14 Degrees (79 Degree Days) | | | | | | | |
| Total Demands | 322,467 | 156,915 | 12,132 | 3,374 | 449 | 112,021 | 607,357.06 |
| Percentage of Total | 53.09% | 25.84% | 2.00% | 0.56% | 0.07% | 18.44% | 100.00% |
| Demands - High Pressure Distribution System | 322,467 | 156,915 | 12,132 | 3,374 | 449 | 112,021 | 607,357 |
| Demands - Low/Medium Pressure Distribution System | 322,467 | 156,489 | 11,621 | 3,281 | - | 14,146 | 508,004 |

(1) Rate FT includes LG&E Transportation Special Contract

Louisville Gas and Electric Company

Allocation of High Pressure and Medium and Low Pressure Mains

Exhibit WSS-35

Page 2 of 2

| | Residential Rate RGS | Commercial Rate CGS | Industrial Rate IGS | Rate AAGS | Rate FT (1) | Total |
|--|-------------------------|------------------------|------------------------|-----------|-------------|------------|
| Actual | | | | | | |
| Total Mcf Sales and Transportation | - | 253,887 | 186,563 | 33,884 | 11,336,626 | 11,810,960 |
| Non-Temp. Sensitive Sales & Transportation - Jul. & Aug. | - | 279 | 38,652 | 6,601 | 1,295,371 | 1,340,903 |
| Annualized Non-Temperature Sensitive Sales & Transport. | - | 1,674 | 186,563 | 33,884 | 7,772,228 | 7,994,349 |
| Non-Temperature Sensitive Sales & Transportation per Day | - | 5 | 511 | 93 | 21,294 | 21,902 |
| Temperature Sensitive Sales & Transportation | - | 252,213 | - | - | 3,564,398 | 3,816,611 |
| Degree Days | 3,585 | 3,585 | 3,677 | 3,677 | 3,677 | |
| Temperature Sensitive Sales & Transportation per Degree Day | - | - | - | - | 969 | 969 |
| Calculated Daily Customer Deliveries (Demands) @ -14 Degrees (79 Degree Days) | | | | | | |
| Total Demands/MDQ | - | 426 | 511 | 93 | 97,875 | 98,483 |
| Percentage of Total | 0% | 0% | 1% | 0% | 99% | 100% |

Exhibit WSS-36

Gas Cost of Service Study Functional Assignment and Classification

(Louisville Gas and Electric Company)

LOUISVILLE GAS AND ELECTRIC COMPANY

Cost of Service Study
12 Months Ended June 30, 2022

Functional Assignment and Classification

| | A | B | C | D | E | F | G | H | I | J | K | L |
|----|---|---|--------|-------|----|---------------|--------------------|-----------------------|----------------|-------------------|---|-------------------------------------|
| 1 | | | | | | | | | | | | |
| 2 | Description | Name | Vector | | | Total Company | Procurement Demand | Procurement Commodity | Storage Demand | Storage Commodity | Transmission Non-Storage Related Demand | Transmission Storage Related Demand |
| 3 | Gas Plant at Original Cost | | | | | | | | | | | |
| 4 | Underground Storage Plant | | | | | | | | | | | |
| 5 | | | | | | | | | | | | |
| 6 | 350-357 | Underground Storage Plant | PT350 | F003 | \$ | 197,915,357 | - | - | 197,915,357 | - | - | - |
| 7 | 358 | Asset Retire Obligation Gas Plant | PT350 | F003 | \$ | - | - | - | - | - | - | - |
| 8 | Total Storage Plant | | | | | | | | | | | |
| 9 | | PTST | | | \$ | 197,915,357 | \$ | - | \$ | - | \$ | - |
| 10 | Transmission Plant | | | | | | | | | | | |
| 11 | 365-372 | Transmission | PT365 | F005 | \$ | 223,442,488 | - | - | - | - | 186,703,851 | 36,738,637 |
| 12 | Distribution Plant | | | | | | | | | | | |
| 13 | 374 | Land and Land Rights | PT374 | F008 | \$ | 1,270,241 | - | - | - | - | - | - |
| 14 | 375 | Structures & Improvements | PT375 | F008 | | 1,284,811 | - | - | - | - | - | - |
| 15 | 376 | Mains | PT376 | F009 | | 491,695,737 | - | - | - | - | - | - |
| 16 | 378 | Meas. & Reg. Sta. Equip. - General | PT378 | F008 | | 42,772,631 | - | - | - | - | - | - |
| 17 | 379 | Meas. & Reg. Sta. Equip. - City Gate | PT379 | F008 | | 19,032,139 | - | - | - | - | - | - |
| 18 | 380 | Services | PT380 | F010 | | 422,716,510 | - | - | - | - | - | - |
| 19 | 381 | Meters | PT381 | F011 | | 69,454,781 | - | - | - | - | - | - |
| 20 | 382 | Meter Installations | PT382 | F011 | | - | - | - | - | - | - | - |
| 21 | 383 | House Regulators | PT383 | F011 | | 27,617,358 | - | - | - | - | - | - |
| 22 | 384 | House Regulator Installations | PT384 | F011 | | - | - | - | - | - | - | - |
| 23 | 385 | Industrial Meas. & Reg. Equip. | PT385 | F011 | | 2,155,727 | - | - | - | - | - | - |
| 24 | 387 | Other Equipment | PT387 | F011 | | 1,990,118 | - | - | - | - | - | - |
| 25 | 388 | Asset Retire Obligation Gas Plant-City Gate | PT388 | F008 | | - | - | - | - | - | - | - |
| 26 | 388 | Asset Retire Obligation Gas Plant-Mains | PT388 | F009 | | - | - | - | - | - | - | - |
| 27 | Sub-Total Distribution Plant | | | | | | | | | | | |
| 28 | | PTDSUB | | | \$ | 1,079,990,052 | \$ | - | \$ | - | \$ | - |
| 29 | U-T-D Subtotal | | | | | | | | | | | |
| 30 | | PTSUB | | | \$ | 1,501,347,897 | - | - | 197,915,357 | - | 186,703,851 | 36,738,637 |
| 31 | Gas Stored Underground/Non-Current | | | | | | | | | | | |
| 32 | 117 & 352 | Gas Stored Underground/Non-Current | PT117 | F003 | \$ | 11,788,845 | - | - | 11,788,845 | - | - | - |
| 33 | 301-303 | Intangible Plant | PT301 | PTSUB | | 387 | - | - | 51 | - | 48 | 9 |
| 34 | 392-396 | General Plant | PT389 | PTSUB | | 16,821,099 | - | - | 2,217,443 | - | 2,091,830 | 411,620 |
| 35 | 301-399 | Common Utility Plant | PTCP | PTSUB | | 103,860,678 | - | - | 13,691,446 | - | 12,915,853 | 2,541,516 |
| 36 | Total Plant in Service | | | | | | | | | | | |
| 37 | | PTIS | | | \$ | 1,633,818,906 | - | - | 225,613,142 | - | 201,711,581 | 39,691,782 |
| 38 | | | | | | | | | | | | |
| 39 | | | | | | | | | | | | |
| 40 | | | | | | | | | | | | |
| 41 | | | | | | | | | | | | |
| 42 | | | | | | | | | | | | |
| 43 | | | | | | | | | | | | |
| 44 | | | | | | | | | | | | |
| 45 | | | | | | | | | | | | |
| 46 | | | | | | | | | | | | |
| 47 | | | | | | | | | | | | |
| 48 | | | | | | | | | | | | |
| 49 | | | | | | | | | | | | |
| 50 | | | | | | | | | | | | |

LOUISVILLE GAS AND ELECTRIC COMPANY

Cost of Service Study
12 Months Ended June 30, 2022

Functional Assignment and Classification

| | A | B | C | D | E | F | G | H | I | J | K | L | | | | | |
|-----|-------------------------------|--------------------------------------|--------|---------------|--------------------|-----------------------|----------------|-------------------|---|-------------------------------------|---------|----|-----------|----|---|----|---|
| 1 | | | | | | | | | | | | | | | | | |
| 2 | Description | Name | Vector | Total Company | Procurement Demand | Procurement Commodity | Storage Demand | Storage Commodity | Transmission Non-Storage Related Demand | Transmission Storage Related Demand | | | | | | | |
| 3 | | | | | | | | | | | | | | | | | |
| 141 | | | | | | | | | | | | | | | | | |
| 142 | Labor Expenses | | | | | | | | | | | | | | | | |
| 143 | | | | | | | | | | | | | | | | | |
| 144 | 807 & 810 | Procurement Expenses | LB807 | DMCM | 707,310 | 83,038 | 624,272 | - | - | - | - | - | | | | | |
| 145 | | | | | | | | | | | | | | | | | |
| 146 | Storage Expenses | | | | | | | | | | | | | | | | |
| 147 | Operation | | | | | | | | | | | | | | | | |
| 148 | 814 | Operations Supervision and Engineer | LB814 | OSE | 788,735 | - | - | 131,016 | 657,719 | - | - | - | | | | | |
| 149 | 815 | Maps and Records | LB815 | F003 | - | - | - | - | - | - | - | - | | | | | |
| 150 | 816 | Well Expenses | LB816 | F003 | 48,170 | - | - | 48,170 | - | - | - | - | | | | | |
| 151 | 817 | Lines Expenses | LB817 | F003 | 220,271 | - | - | 220,271 | - | - | - | - | | | | | |
| 152 | 818 | Compressor Station Exp - Payroll | LB818 | F004 | 778,006 | - | - | - | 778,006 | - | - | - | | | | | |
| 153 | 819 | Compressor Station Fuel and Power | LB819 | F004 | - | - | - | - | - | - | - | - | | | | | |
| 154 | 820 | Measurement and Regulator Station | LB820 | F003 | - | - | - | - | - | - | - | - | | | | | |
| 155 | 821 | Purification of Natural Gas | LB821 | F004 | 569,604 | - | - | - | 569,604 | - | - | - | | | | | |
| 156 | 823 | Gas losses | LB823 | F004 | - | - | - | - | - | - | - | - | | | | | |
| 157 | 824 | Other Expenses | LB824 | F004 | - | - | - | - | - | - | - | - | | | | | |
| 158 | 825 | Storage Well Royalties | LB825 | F003 | - | - | - | - | - | - | - | - | | | | | |
| 159 | 826 | Rents | LB826 | F003 | - | - | - | - | - | - | - | - | | | | | |
| 160 | | | | | | | | | | | | | | | | | |
| 161 | Total Storage Operation Labor | LBSO | | \$ | 2,404,786 | \$ | - | \$ | - | \$ | 399,457 | \$ | 2,005,329 | \$ | - | \$ | - |
| 162 | | | | | | | | | | | | | | | | | |
| 163 | | | | | | | | | | | | | | | | | |
| 164 | | | | | | | | | | | | | | | | | |
| 165 | Storage Expense | | | | | | | | | | | | | | | | |
| 166 | Maintenance | | | | | | | | | | | | | | | | |
| 167 | 830 | Maintenance Super and Eng. | LB830 | MSE | 437,056 | - | - | 235,421 | 201,635 | - | - | - | | | | | |
| 168 | 831 | Maintenance of Structures | LB831 | F003 | - | - | - | - | - | - | - | - | | | | | |
| 169 | 832 | Maintenance of Reservoirs | LB832 | F003 | 83,454 | - | - | 83,454 | - | - | - | - | | | | | |
| 170 | 833 | Maintenance of Lines | LB833 | F003 | 432,731 | - | - | 432,731 | - | - | - | - | | | | | |
| 171 | 834 | Main of Compressor Station Equipment | LB834 | F004 | 286,492 | - | - | - | 286,492 | - | - | - | | | | | |
| 172 | 835 | Main of Meas and Reg Sta. Equip | LB835 | F003 | - | - | - | - | - | - | - | - | | | | | |
| 173 | 836 | Main of Purification Equip | LB836 | F004 | 280,992 | - | - | - | 280,992 | - | - | - | | | | | |
| 174 | 837 | Main of Other Equipment | LB837 | F003 | 146,389 | - | - | 146,389 | - | - | - | - | | | | | |
| 175 | | | | | | | | | | | | | | | | | |
| 176 | Total Maintenance Labor | LBSM | | \$ | 1,667,114 | \$ | - | \$ | - | \$ | 897,995 | \$ | 769,119 | \$ | - | \$ | - |
| 177 | | | | | | | | | | | | | | | | | |
| 178 | | | | | | | | | | | | | | | | | |
| 179 | Total Storage Labor | LBS | | \$ | 4,071,900 | - | - | 1,297,453 | 2,774,447 | - | - | - | | | | | |
| 180 | | | | | | | | | | | | | | | | | |
| 181 | | | | | | | | | | | | | | | | | |
| 182 | | | | | | | | | | | | | | | | | |
| 183 | | | | | | | | | | | | | | | | | |

LOUISVILLE GAS AND ELECTRIC COMPANY

Cost of Service Study
12 Months Ended June 30, 2022

Functional Assignment and Classification

| | A | B | C | D | M | N | O | P | Q | R |
|-----|-------------------------------|--------------------------------------|--------|------|---------------------------|--|---|---|---|---|
| 1 | | | | | | Distribution Structures & Equipment Demand | Distribution Mains - Low & Med. Pressure Demand | Distribution Mains - Low & Med. Pressure Customer | Distribution Mains - High Pressure Demand | Distribution Mains - High Pressure Customer |
| 2 | Description | Name | Vector | | Distribution Commodity | | | | | |
| 3 | | | | | | | | | | |
| 141 | | | | | | | | | | |
| 142 | Labor Expenses | | | | | | | | | |
| 143 | | | | | | | | | | |
| 144 | 807 & 810 | Procurement Expenses | LB807 | DMCM | - | - | - | - | - | - |
| 145 | | | | | | | | | | |
| 146 | Storage Expenses | | | | | | | | | |
| 147 | Operation | | | | | | | | | |
| 148 | 814 | Operations Supervision and Engineer | LB814 | OSE | - | - | - | - | - | - |
| 149 | 815 | Maps and Records | LB815 | F003 | - | - | - | - | - | - |
| 150 | 816 | Well Expenses | LB816 | F003 | - | - | - | - | - | - |
| 151 | 817 | Lines Expenses | LB817 | F003 | - | - | - | - | - | - |
| 152 | 818 | Compressor Station Exp - Payroll | LB818 | F004 | - | - | - | - | - | - |
| 153 | 819 | Compressor Station Fuel and Power | LB819 | F004 | - | - | - | - | - | - |
| 154 | 820 | Measurement and Regulator Station | LB820 | F003 | - | - | - | - | - | - |
| 155 | 821 | Purification of Natural Gas | LB821 | F004 | - | - | - | - | - | - |
| 156 | 823 | Gas losses | LB823 | F004 | - | - | - | - | - | - |
| 157 | 824 | Other Expenses | LB824 | F004 | - | - | - | - | - | - |
| 158 | 825 | Storage Well Royalties | LB825 | F003 | - | - | - | - | - | - |
| 159 | 826 | Rents | LB826 | F003 | - | - | - | - | - | - |
| 160 | | | | | | | | | | |
| 161 | Total Storage Operation Labor | LBSO | \$ | | - | \$ | - | \$ | - | \$ |
| 162 | | | | | | | | | | |
| 163 | | | | | | | | | | |
| 164 | | | | | | | | | | |
| 165 | Storage Expense | | | | | | | | | |
| 166 | Maintenance | | | | | | | | | |
| 167 | 830 | Maintenance Super and Eng. | LB830 | MSE | - | - | - | - | - | - |
| 168 | 831 | Maintenance of Structures | LB831 | F003 | - | - | - | - | - | - |
| 169 | 832 | Maintenance of Reservoirs | LB832 | F003 | - | - | - | - | - | - |
| 170 | 833 | Maintenance of Lines | LB833 | F003 | - | - | - | - | - | - |
| 171 | 834 | Main of Compressor Station Equipment | LB834 | F004 | - | - | - | - | - | - |
| 172 | 835 | Main of Meas and Reg Sta. Equip | LB835 | F003 | - | - | - | - | - | - |
| 173 | 836 | Main of Purification Equip | LB836 | F004 | - | - | - | - | - | - |
| 174 | 837 | Main of Other Equipment | LB837 | F003 | - | - | - | - | - | - |
| 175 | | | | | | | | | | |
| 176 | Total Maintenance Labor | LBSM | \$ | | - | \$ | - | \$ | - | \$ |
| 177 | | | | | | | | | | |
| 178 | | | | | | | | | | |
| 179 | Total Storage Labor | LBS | | | - | | - | | - | |
| 180 | | | | | | | | | | |
| 181 | | | | | | | | | | |
| 182 | | | | | | | | | | |
| 183 | | | | | | | | | | |

LOUISVILLE GAS AND ELECTRIC COMPANY

Cost of Service Study
12 Months Ended June 30, 2022

Functional Assignment and Classification

| | A | B | C | D | S | T | U | V |
|-----|-------------------------------|--------------------------------------|--------|-------------------|-----------------|----------------------------|-----------------------------------|---|
| 1 | | | | | | | | |
| 2 | Description | Name | Vector | Services Customer | Meters Customer | Customer Accounts Customer | Customer Service Expense Customer | |
| 3 | | | | | | | | |
| 141 | | | | | | | | |
| 142 | Labor Expenses | | | | | | | |
| 143 | | | | | | | | |
| 144 | 807 & 810 | Procurement Expenses | LB807 | DMCM | - | - | - | - |
| 145 | | | | | | | | |
| 146 | Storage Expenses | | | | | | | |
| 147 | Operation | | | | | | | |
| 148 | 814 | Operations Supervision and Engineer | LB814 | OSE | - | - | - | - |
| 149 | 815 | Maps and Records | LB815 | F003 | - | - | - | - |
| 150 | 816 | Well Expenses | LB816 | F003 | - | - | - | - |
| 151 | 817 | Lines Expenses | LB817 | F003 | - | - | - | - |
| 152 | 818 | Compressor Station Exp - Payroll | LB818 | F004 | - | - | - | - |
| 153 | 819 | Compressor Station Fuel and Power | LB819 | F004 | - | - | - | - |
| 154 | 820 | Measurement and Regulator Station | LB820 | F003 | - | - | - | - |
| 155 | 821 | Purification of Natural Gas | LB821 | F004 | - | - | - | - |
| 156 | 823 | Gas losses | LB823 | F004 | - | - | - | - |
| 157 | 824 | Other Expenses | LB824 | F004 | - | - | - | - |
| 158 | 825 | Storage Well Royalties | LB825 | F003 | - | - | - | - |
| 159 | 826 | Rents | LB826 | F003 | - | - | - | - |
| 160 | | | | | | | | |
| 161 | Total Storage Operation Labor | LBSO | \$ | | - \$ | - \$ | - \$ | - |
| 162 | | | | | | | | |
| 163 | | | | | | | | |
| 164 | | | | | | | | |
| 165 | Storage Expense | | | | | | | |
| 166 | Maintenance | | | | | | | |
| 167 | 830 | Maintenance Super and Eng. | LB830 | MSE | - | - | - | - |
| 168 | 831 | Maintenance of Structures | LB831 | F003 | - | - | - | - |
| 169 | 832 | Maintenance of Reservoirs | LB832 | F003 | - | - | - | - |
| 170 | 833 | Maintenance of Lines | LB833 | F003 | - | - | - | - |
| 171 | 834 | Main of Compressor Station Equipment | LB834 | F004 | - | - | - | - |
| 172 | 835 | Main of Meas and Reg Sta. Equip | LB835 | F003 | - | - | - | - |
| 173 | 836 | Main of Purification Equip | LB836 | F004 | - | - | - | - |
| 174 | 837 | Main of Other Equipment | LB837 | F003 | - | - | - | - |
| 175 | | | | | | | | |
| 176 | Total Maintenance Labor | LBSM | \$ | | - \$ | - \$ | - \$ | - |
| 177 | | | | | | | | |
| 178 | | | | | | | | |
| 179 | Total Storage Labor | LBS | | | - | - | - | - |
| 180 | | | | | | | | |
| 181 | | | | | | | | |
| 182 | | | | | | | | |
| 183 | | | | | | | | |

LOUISVILLE GAS AND ELECTRIC COMPANY

Cost of Service Study
12 Months Ended June 30, 2022

Functional Assignment and Classification

| | A | B | C | D | E | F | G | H | I | J | K | L |
|-----|--|---------------------------------------|----------|--------|----|---------------|--------------------|-----------------------|----------------|-------------------|---|-------------------------------------|
| 1 | | | | | | | | | | | | |
| 2 | Description | Name | Vector | | | Total Company | Procurement Demand | Procurement Commodity | Storage Demand | Storage Commodity | Transmission Non-Storage Related Demand | Transmission Storage Related Demand |
| 3 | | | | | | | | | | | | |
| 184 | | | | | | | | | | | | |
| 185 | Labor Expenses (Continued) | | | | | | | | | | | |
| 186 | | | | | | | | | | | | |
| 187 | | | | | | | | | | | | |
| 188 | Transmission | | | | | | | | | | | |
| 189 | 850-867 | Transmission Expenses | LB850 | F005 | \$ | 2,919,136 | - | - | - | - | 2,439,169 | 479,967 |
| 190 | | | | | | | | | | | | |
| 191 | Distribution Expenses | | | | | | | | | | | |
| 192 | Operation | | | | | | | | | | | |
| 193 | 870 | Operation Supr and Engr | LB870 | DOES | \$ | - | - | - | - | - | - | - |
| 194 | 871 | Dist Load Dispatching | LB871 | F007 | | 838,265 | - | - | - | - | - | - |
| 195 | 872 | Compr. Station Labor and Exp. | LB872 | F007 | | - | - | - | - | - | - | - |
| 196 | 873 | Compr. Station Fuel and Power | LB873 | F007 | | - | - | - | - | - | - | - |
| 197 | 874.01 | Other Mains/Serv. Expenses | LB874.01 | CADAL | | 1,811,145 | - | - | - | - | - | - |
| 198 | 874.02 | Leak Survey-Mains | LB874.02 | F009 | | - | - | - | - | - | - | - |
| 199 | 874.03 | Leak Survey - Service | LB874.03 | F010 | | - | - | - | - | - | - | - |
| 200 | 874.04 | Locate Main per Request | LB874.04 | CADAL | | - | - | - | - | - | - | - |
| 201 | 874.05 | Check Stop Box Access | LB874.05 | F010 | | - | - | - | - | - | - | - |
| 202 | 874.06 | Patrolling Mains | LB874.06 | F009 | | - | - | - | - | - | - | - |
| 203 | 874.07 | Check/Grease Valves | LB874.07 | F009 | | - | - | - | - | - | - | - |
| 204 | 874.08 | Opr. Odor Equipment | LB874.08 | F007 | | - | - | - | - | - | - | - |
| 205 | 874.09 | Locate and Inspect Valve Boxes | LB874.09 | F009 | | - | - | - | - | - | - | - |
| 206 | 874.1 | Cut Grass - Right of Way | LB874.10 | F009 | | - | - | - | - | - | - | - |
| 207 | 875 | Meas and Reg Station Exp.- General | LB875 | F008 | \$ | 884,412 | - | - | - | - | - | - |
| 208 | 876 | Meas and Reg Station Exp.- Industrial | LB876 | F011 | \$ | 424,143 | - | - | - | - | - | - |
| 209 | 877 | Meas and Reg Station Exp. - City Gate | LB877 | F008 | \$ | 136,159 | - | - | - | - | - | - |
| 210 | 878 | Meter and House Reg. Expense | LB878 | F011 | \$ | 965,746 | - | - | - | - | - | - |
| 211 | 879 | Customer Installation Expense | LB879 | F011 | \$ | 168,892 | - | - | - | - | - | - |
| 212 | 880 | Other Expenses | LB880 | PTDSUB | \$ | 2,738,849 | - | - | - | - | - | - |
| 213 | 881 | Rents | LB881 | PTDSUB | \$ | - | - | - | - | - | - | - |
| 214 | | | | | | | | | | | | |
| 215 | Total Operations Distribution Labor | LBDO | | | \$ | 7,967,611 | \$ | - | \$ | - | \$ | - |
| 216 | | | | | | | | | | | | |
| 217 | Total Operations Transmission and Distribution Labor | LBTD0 | | | \$ | 10,886,747 | \$ | - | \$ | - | \$ | 479,967 |
| 218 | | | | | | | | | | | | |
| 219 | | | | | | | | | | | | |
| 220 | | | | | | | | | | | | |
| 221 | | | | | | | | | | | | |
| 222 | | | | | | | | | | | | |
| 223 | | | | | | | | | | | | |
| 224 | | | | | | | | | | | | |
| 225 | | | | | | | | | | | | |
| 226 | | | | | | | | | | | | |

LOUISVILLE GAS AND ELECTRIC COMPANY

Cost of Service Study
12 Months Ended June 30, 2022

Functional Assignment and Classification

| | A | B | C | D | S | T | U | V |
|-----|--|---------------------------------------|----------|----------|-----------|----------|-------------------|------------------|
| 1 | | | | | Services | Meters | Customer Accounts | Customer Service |
| 2 | Description | Name | Vector | Customer | Customer | Customer | Customer | Expense |
| 3 | | | | | | | | |
| 184 | | | | | | | | |
| 185 | Labor Expenses (Continued) | | | | | | | |
| 186 | | | | | | | | |
| 187 | | | | | | | | |
| 188 | Transmission | | | | | | | |
| 189 | 850-867 | Transmission Expenses | LB850 | F005 | - | - | - | - |
| 190 | | | | | | | | |
| 191 | Distribution Expenses | | | | | | | |
| 192 | Operation | | | | | | | |
| 193 | 870 | Operation Supr and Engr | LB870 | DOES | - | - | - | - |
| 194 | 871 | Dist Load Dispatching | LB871 | F007 | - | - | - | - |
| 195 | 872 | Compr. Station Labor and Exp. | LB872 | F007 | - | - | - | - |
| 196 | 873 | Compr. Station Fuel and Power | LB873 | F007 | - | - | - | - |
| 197 | 874.01 | Other Mains/Serv. Expenses | LB874.01 | CADAL | 837,260 | - | - | - |
| 198 | 874.02 | Leak Survey-Mains | LB874.02 | F009 | - | - | - | - |
| 199 | 874.03 | Leak Survey - Service | LB874.03 | F010 | - | - | - | - |
| 200 | 874.04 | Locate Main per Request | LB874.04 | CADAL | - | - | - | - |
| 201 | 874.05 | Check Stop Box Access | LB874.05 | F010 | - | - | - | - |
| 202 | 874.06 | Patrolling Mains | LB874.06 | F009 | - | - | - | - |
| 203 | 874.07 | Check/Grease Valves | LB874.07 | F009 | - | - | - | - |
| 204 | 874.08 | Opr. Odor Equipment | LB874.08 | F007 | - | - | - | - |
| 205 | 874.09 | Locate and Inspect Valve Boxes | LB874.09 | F009 | - | - | - | - |
| 206 | 874.1 | Cut Grass - Right of Way | LB874.10 | F009 | - | - | - | - |
| 207 | 875 | Meas and Reg Station Exp.- General | LB875 | F008 | - | - | - | - |
| 208 | 876 | Meas and Reg Station Exp.- Industrial | LB876 | F011 | - | 424,143 | - | - |
| 209 | 877 | Meas and Reg Station Exp. - City Gate | LB877 | F008 | - | - | - | - |
| 210 | 878 | Meter and House Reg. Expense | LB878 | F011 | - | 965,746 | - | - |
| 211 | 879 | Customer Installation Expense | LB879 | F011 | - | 168,892 | - | - |
| 212 | 880 | Other Expenses | LB880 | PTDSUB | 1,072,007 | 256,688 | - | - |
| 213 | 881 | Rents | LB881 | PTDSUB | - | - | - | - |
| 214 | | | | | | | | |
| 215 | Total Operations Distribution Labor | LBDO | | \$ | 1,909,267 | \$ | 1,815,469 | \$ |
| 216 | | | | | | | | |
| 217 | Total Operations Transmission and Distribution Labor | LBTD0 | | \$ | 1,909,267 | \$ | 1,815,469 | \$ |
| 218 | | | | | | | | |
| 219 | | | | | | | | |
| 220 | | | | | | | | |
| 221 | | | | | | | | |
| 222 | | | | | | | | |
| 223 | | | | | | | | |
| 224 | | | | | | | | |
| 225 | | | | | | | | |
| 226 | | | | | | | | |

LOUISVILLE GAS AND ELECTRIC COMPANY

Cost of Service Study
12 Months Ended June 30, 2022

Functional Assignment and Classification

| | A | B | C | D | S | T | U | V |
|-----|--|---------------------------------------|--------|----------------------|--------------------|-------------------------------|---------------------|------------------|
| 1 | | | | | | | | Customer Service |
| 2 | Description | Name | Vector | Services Customer | Meters Customer | Customer Accounts Customer | Expense Customer | |
| 3 | | | | | | | | |
| 227 | | | | | | | | |
| 228 | Labor Expenses (Continued) | | | | | | | |
| 229 | | | | | | | | |
| 230 | | | | | | | | |
| 231 | Maintenance Expense -- Distribution | | | | | | | |
| 232 | | | | | | | | |
| 233 | 885 | Maintenance Supr and Engr | LB885 | DMES | - | - | - | - |
| 234 | 886 | Maintenance Structures | LB886 | F008 | - | - | - | - |
| 235 | 887 | Maintenance Mains | LB887 | F009 | - | - | - | - |
| 236 | 888 | Maintenance Comp. Station Equip. | LB888 | F007 | - | - | - | - |
| 237 | 889 | Maintenance Meas and Reg. General | LB889 | F008 | - | - | - | - |
| 238 | 890 | Maintenance Meas and Reg - Industrial | LB890 | F011 | - | 188,595 | - | - |
| 239 | 891 | Maintenance Meas and Reg.-City Gate | LB891 | F008 | - | - | - | - |
| 240 | 892 | Maintenance Services | LB892 | F010 | 537,961 | - | - | - |
| 241 | 893 | Maintenance Meters and House Reg. | LB893 | F011 | - | - | - | - |
| 242 | 894 | Maintenance Other Equipment | LB894 | PTDSUB | 33,661 | 8,060 | - | - |
| 243 | | | | | | | | |
| 244 | Total Maintenance Labor | LBDM | | \$ | 571,622 | \$ | 196,655 | \$ |
| 245 | | | | | | | | |
| 246 | Total Transmission & Distribution Labor | LBTD | | \$ | 2,480,889 | \$ | 2,012,124 | \$ |
| 247 | | | | | | | | |
| 248 | | | | | | | | |
| 249 | Customer Accounts Expense | | | | | | | |
| 250 | 901 | Supervision | LB901 | F012 | - | - | 858,916 | - |
| 251 | 902 | Meter Reading | LB902 | F012 | - | - | 291,309 | - |
| 252 | 903 | Customer Records and Collections | LB903 | F012 | - | - | 2,764,532 | - |
| 253 | 904 | Uncollectible Accounts | LB904 | F012 | - | - | - | - |
| 254 | 905 | Misc. Cust Account Expenses | LB905 | F012 | - | - | - | - |
| 255 | | | | | | | | |
| 256 | Total Customer Accounts Labor | LBCA | | \$ | - | \$ | 3,914,757 | \$ |
| 257 | | | | | | | | |
| 258 | Customer Service Expenses | | | | | | | |
| 259 | 907-910 | Customer Service | LB907 | F013 | - | - | - | 240,990 |
| 260 | | | | | | | | |
| 261 | Sales Expenses | | | | | | | |
| 262 | 911-916 | Sales Expenses | LB911 | F013 | - | - | - | - |
| 263 | | | | | | | | |
| 264 | | | | | | | | |
| 265 | | | | | | | | |
| 266 | | | | | | | | |
| 267 | | | | | | | | |
| 268 | | | | | | | | |
| 269 | | | | | | | | |

LOUISVILLE GAS AND ELECTRIC COMPANY

Cost of Service Study
12 Months Ended June 30, 2022

Functional Assignment and Classification

| | A | B | C | D | E | F | G | H | I | J | K | L | | | | | |
|-----|--|--------------------------------|---------|---------------|--------------------|-----------------------|----------------|-------------------|---|-------------------------------------|-----------|----|-----------|----|-----------|----|----------|
| 1 | | | | | | | | | | | | | | | | | |
| 2 | Description | Name | Vector | Total Company | Procurement Demand | Procurement Commodity | Storage Demand | Storage Commodity | Transmission Non-Storage Related Demand | Transmission Storage Related Demand | | | | | | | |
| 3 | | | | | | | | | | | | | | | | | |
| 270 | | | | | | | | | | | | | | | | | |
| 271 | Labor Expenses (Continued) | | | | | | | | | | | | | | | | |
| 272 | | | | | | | | | | | | | | | | | |
| 273 | | | | | | | | | | | | | | | | | |
| 274 | Administrative & General | | | | | | | | | | | | | | | | |
| 275 | 920 | Admin and General Salaries | LB920 | LBSUB | \$6,639,407 | | 21,993 | | 165,339 | | 343,631 | | 734,813 | | 646,015 | | 127,119 |
| 276 | 921 | Office Supplies and Expense | LB921 | LBSUB | - | | - | | - | | - | | - | | - | | - |
| 277 | 922 | Admin. Expenses Transferred | LB922 | LBSUB | (774,439) | | (2,565) | | (19,286) | | (40,082) | | (85,711) | | (75,353) | | (14,828) |
| 278 | 923 | Outside Services Employed | LB923 | LBSUB | - | | - | | - | | - | | - | | - | | - |
| 279 | 924 | Property Insurance | LB924 | PTT | - | | - | | - | | - | | - | | - | | - |
| 280 | 925 | Injuries and Damages | LB925 | LBSUB | - | | - | | - | | - | | - | | - | | - |
| 281 | 926 | Employee Pensions and Benefits | LB926 | LBSUB | - | | - | | - | | - | | - | | - | | - |
| 282 | 927 | Franchise Requirement | LB927 | PTT | - | | - | | - | | - | | - | | - | | - |
| 283 | 928 | Regulatory Commission Fee | LB928 | PTT | - | | - | | - | | - | | - | | - | | - |
| 284 | 929 | Duplicate Charges -Credit | LB929 | LBSUB | - | | - | | - | | - | | - | | - | | - |
| 285 | 930.1 | General Advertising Expense | LB930.1 | PTT | - | | - | | - | | - | | - | | - | | - |
| 286 | 930.2 | Misc. General Expense | LB930.2 | LBSUB | - | | - | | - | | - | | - | | - | | - |
| 287 | 931 | Rents | LB931 | PTT | - | | - | | - | | - | | - | | - | | - |
| 288 | 935 | Maintenance of General Plant | LB935 | PT389 | 225,648 | | - | | - | | 29,746 | | - | | 28,061 | | 5,522 |
| 289 | | | | | | | | | | | | | | | | | |
| 290 | Total Administrative and General Labor | | LBAG | | \$ 6,090,616 | \$ | 19,427 | \$ | 146,053 | \$ | 333,295 | \$ | 649,103 | \$ | 598,723 | \$ | 117,814 |
| 291 | | | | | | | | | | | | | | | | | |
| 292 | Total Labor Expense | | LBTOT | | \$ 31,159,141 | \$ | 102,466 | \$ | 770,325 | \$ | 1,630,747 | \$ | 3,423,550 | \$ | 3,037,891 | \$ | 597,781 |
| 293 | | | | | | | | | | | | | | | | | |
| 294 | | | | | | | | | | | | | | | | | |
| 295 | | | | | | | | | | | | | | | | | |
| 296 | | | | | | | | | | | | | | | | | |
| 297 | | | | | | | | | | | | | | | | | |
| 298 | | | | | | | | | | | | | | | | | |
| 299 | | | | | | | | | | | | | | | | | |
| 300 | | | | | | | | | | | | | | | | | |
| 301 | | | | | | | | | | | | | | | | | |
| 302 | | | | | | | | | | | | | | | | | |
| 303 | | | | | | | | | | | | | | | | | |
| 304 | | | | | | | | | | | | | | | | | |
| 305 | | | | | | | | | | | | | | | | | |
| 306 | | | | | | | | | | | | | | | | | |
| 307 | | | | | | | | | | | | | | | | | |
| 308 | | | | | | | | | | | | | | | | | |
| 309 | | | | | | | | | | | | | | | | | |
| 310 | | | | | | | | | | | | | | | | | |
| 311 | | | | | | | | | | | | | | | | | |
| 312 | | | | | | | | | | | | | | | | | |

LOUISVILLE GAS AND ELECTRIC COMPANY

Cost of Service Study
12 Months Ended June 30, 2022

Functional Assignment and Classification

| | A | B | C | D | S | T | U | V | | |
|-----|--|--------------------------------|---------|-----------|----------|-------------------|-----------|------------------|----|---------|
| 1 | | | | | | | | Customer Service | | |
| 2 | Description | Name | Vector | Services | Meters | Customer Accounts | Expense | | | |
| 3 | | | | Customer | Customer | Customer | Customer | Customer | | |
| 270 | Labor Expenses (Continued) | | | | | | | | | |
| 271 | Administrative & General | | | | | | | | | |
| 272 | 920 | Admin and General Salaries | LB920 | LBSUB | 657,064 | 532,912 | 1,036,825 | 63,826 | | |
| 273 | 921 | Office Supplies and Expense | LB921 | LBSUB | - | - | - | - | | |
| 274 | 922 | Admin. Expenses Transferred | LB922 | LBSUB | (76,642) | (62,160) | (120,938) | (7,445) | | |
| 275 | 923 | Outside Services Employed | LB923 | LBSUB | - | - | - | - | | |
| 276 | 924 | Property Insurance | LB924 | PTT | - | - | - | - | | |
| 277 | 925 | Injuries and Damages | LB925 | LBSUB | - | - | - | - | | |
| 278 | 926 | Employee Pensions and Benefits | LB926 | LBSUB | - | - | - | - | | |
| 279 | 927 | Franchise Requirement | LB927 | PTT | - | - | - | - | | |
| 280 | 928 | Regulatory Commission Fee | LB928 | PTT | - | - | - | - | | |
| 281 | 929 | Duplicate Charges -Credit | LB929 | LBSUB | - | - | - | - | | |
| 282 | 930.1 | General Advertising Expense | LB930.1 | PTT | - | - | - | - | | |
| 283 | 930.2 | Misc. General Expense | LB930.2 | LBSUB | - | - | - | - | | |
| 284 | 931 | Rents | LB931 | PTT | - | - | - | - | | |
| 285 | 935 | Maintenance of General Plant | LB935 | PT389 | 63,533 | 15,213 | - | - | | |
| 286 | | | | | | | | | | |
| 287 | | | | | | | | | | |
| 288 | | | | | | | | | | |
| 289 | | | | | | | | | | |
| 290 | Total Administrative and General Labor | LBAG | \$ | 643,955 | \$ | 485,964 | \$ | 915,887 | \$ | 56,381 |
| 291 | | | | | | | | | | |
| 292 | Total Labor Expense | LBTOT | \$ | 3,124,844 | \$ | 2,498,089 | \$ | 4,830,644 | \$ | 297,372 |
| 293 | | | | | | | | | | |
| 294 | | | | | | | | | | |
| 295 | | | | | | | | | | |
| 296 | | | | | | | | | | |
| 297 | | | | | | | | | | |
| 298 | | | | | | | | | | |
| 299 | | | | | | | | | | |
| 300 | | | | | | | | | | |
| 301 | | | | | | | | | | |
| 302 | | | | | | | | | | |
| 303 | | | | | | | | | | |
| 304 | | | | | | | | | | |
| 305 | | | | | | | | | | |
| 306 | | | | | | | | | | |
| 307 | | | | | | | | | | |
| 308 | | | | | | | | | | |
| 309 | | | | | | | | | | |
| 310 | | | | | | | | | | |
| 311 | | | | | | | | | | |
| 312 | | | | | | | | | | |

LOUISVILLE GAS AND ELECTRIC COMPANY

Cost of Service Study
12 Months Ended June 30, 2022

Functional Assignment and Classification

| | A | B | C | D | E | F | G | H | I | J | K | L | | | | |
|-----|---|--------------------------------------|--------|------|----|---------------|--------------------|-----------------------|----------------|-------------------|---|-------------------------------------|----|---|----|---|
| 1 | | | | | | | | | | | | | | | | |
| 2 | Description | Name | Vector | | | Total Company | Procurement Demand | Procurement Commodity | Storage Demand | Storage Commodity | Transmission Non-Storage Related Demand | Transmission Storage Related Demand | | | | |
| 3 | | | | | | | | | | | | | | | | |
| 313 | | | | | | | | | | | | | | | | |
| 314 | Operation & Maintenance Expenses | | | | | | | | | | | | | | | |
| 315 | | | | | | | | | | | | | | | | |
| 316 | 807 & 810 | Procurement Expenses | OM807 | DMCM | \$ | 992,354 | 116,502 | 875,852 | - | - | - | - | | | | |
| 317 | | | | | | | | | | | | | | | | |
| 318 | Storage Expenses | | | | | | | | | | | | | | | |
| 319 | Operation | | | | | | | | | | | | | | | |
| 320 | 814 | Operations Supervision and Engineer | OM814 | OSE | | 1,152,053 | - | - | 191,367 | 960,686 | - | - | | | | |
| 321 | 815 | Maps and Records | OM815 | F003 | | - | - | - | - | - | - | - | | | | |
| 322 | 816 | Well Expenses | OM816 | F003 | | 67,379 | - | - | 67,379 | - | - | - | | | | |
| 323 | 817 | Lines Expenses | OM817 | F003 | | 456,556 | - | - | 456,556 | - | - | - | | | | |
| 324 | 818 | Compressor Station Exp - Payroll | OM818 | F004 | | 2,565,926 | - | - | - | 2,565,926 | - | - | | | | |
| 325 | 819 | Compressor Station Fuel and Power | OM819 | F004 | | 85,300 | - | - | - | 85,300 | - | - | | | | |
| 326 | 820 | Measurement and Regulator Station | OM820 | F003 | | - | - | - | - | - | - | - | | | | |
| 327 | 821 | Purification of Natural Gas (1) | OM821 | F004 | | 1,378,252 | - | - | - | 1,378,252 | - | - | | | | |
| 328 | 823 | Gas losses (2) | OM823 | F004 | | - | - | - | - | - | - | - | | | | |
| 329 | 824 | Other Expenses | OM824 | F004 | | - | - | - | - | - | - | - | | | | |
| 330 | 825 | Storage Well Royalties | OM825 | F003 | | 159,348 | - | - | 159,348 | - | - | - | | | | |
| 331 | 826 | Rents | OM826 | F003 | | - | - | - | - | - | - | - | | | | |
| 332 | | | | | | | | | | | | | | | | |
| 333 | Total Operation Expenses | | OMOE | | \$ | 5,864,814 | \$ | - | \$ | 874,650 | \$ | 4,990,164 | \$ | - | \$ | - |
| 334 | | | | | | | | | | | | | | | | |
| 335 | | | | | | | | | | | | | | | | |
| 336 | | | | | | | | | | | | | | | | |
| 337 | Storage Expense | | | | | | | | | | | | | | | |
| 338 | Maintenance | | | | | | | | | | | | | | | |
| 339 | 830 | Maintenance Super and Eng. | OM830 | MSE | \$ | 634,879 | - | - | 341,979 | 292,900 | - | - | | | | |
| 340 | 831 | Maintenance of Structures | OM831 | F003 | | - | - | - | - | - | - | - | | | | |
| 341 | 832 | Maintenance of Reservoirs | OM832 | F003 | | 912,108 | - | - | 912,108 | - | - | - | | | | |
| 342 | 833 | Maintenance of Lines | OM833 | F003 | | 915,216 | - | - | 915,216 | - | - | - | | | | |
| 343 | 834 | Main of Compressor Station Equipment | OM834 | F004 | | 728,517 | - | - | - | 728,517 | - | - | | | | |
| 344 | 835 | Main of Meas and Reg Sta. Equip | OM835 | F003 | | - | - | - | - | - | - | - | | | | |
| 345 | 836 | Main of Purification Equip | OM836 | F004 | | 872,407 | - | - | - | 872,407 | - | - | | | | |
| 346 | 837 | Main of Other Equipment | OM837 | F003 | | 340,227 | - | - | 340,227 | - | - | - | | | | |
| 347 | | | | | | | | | | | | | | | | |
| 348 | Total Maintenance Expense | | OMME | | \$ | 4,403,354 | \$ | - | \$ | 2,509,530 | \$ | 1,893,824 | \$ | - | \$ | - |
| 349 | | | | | | | | | | | | | | | | |
| 350 | | | | | | | | | | | | | | | | |
| 351 | Total Storage Expense | | OMS | | \$ | 10,268,168 | - | - | 3,384,180 | 6,883,988 | - | - | | | | |
| 352 | | | | | | | | | | | | | | | | |
| 353 | | | | | | | | | | | | | | | | |
| 354 | | | | | | | | | | | | | | | | |
| 355 | | | | | | | | | | | | | | | | |

LOUISVILLE GAS AND ELECTRIC COMPANY

Cost of Service Study
12 Months Ended June 30, 2022

Functional Assignment and Classification

| | A | B | C | D | S | T | U | V |
|-----|---|--------------------------------------|--------|----------------------|--------------------|-------------------------------|---|---|
| 1 | | | | | | | | |
| 2 | Description | Name | Vector | Services Customer | Meters Customer | Customer Accounts Customer | Customer Service Expense Customer | |
| 3 | | | | | | | | |
| 313 | | | | | | | | |
| 314 | Operation & Maintenance Expenses | | | | | | | |
| 315 | | | | | | | | |
| 316 | 807 & 810 | Procurement Expenses | OM807 | DMCM | - | - | - | - |
| 317 | | | | | | | | |
| 318 | Storage Expenses | | | | | | | |
| 319 | Operation | | | | | | | |
| 320 | 814 | Operations Supervision and Engineer | OM814 | OSE | - | - | - | - |
| 321 | 815 | Maps and Records | OM815 | F003 | - | - | - | - |
| 322 | 816 | Well Expenses | OM816 | F003 | - | - | - | - |
| 323 | 817 | Lines Expenses | OM817 | F003 | - | - | - | - |
| 324 | 818 | Compressor Station Exp - Payroll | OM818 | F004 | - | - | - | - |
| 325 | 819 | Compressor Station Fuel and Power | OM819 | F004 | - | - | - | - |
| 326 | 820 | Measurement and Regulator Station | OM820 | F003 | - | - | - | - |
| 327 | 821 | Purification of Natural Gas (1) | OM821 | F004 | - | - | - | - |
| 328 | 823 | Gas losses (2) | OM823 | F004 | - | - | - | - |
| 329 | 824 | Other Expenses | OM824 | F004 | - | - | - | - |
| 330 | 825 | Storage Well Royalties | OM825 | F003 | - | - | - | - |
| 331 | 826 | Rents | OM826 | F003 | - | - | - | - |
| 332 | | | | | | | | |
| 333 | Total Operation Expenses | OMOE | \$ | - | \$ | - | \$ | - |
| 334 | | | | | | | | |
| 335 | | | | | | | | |
| 336 | | | | | | | | |
| 337 | Storage Expense | | | | | | | |
| 338 | Maintenance | | | | | | | |
| 339 | 830 | Maintenance Super and Eng. | OM830 | MSE | - | - | - | - |
| 340 | 831 | Maintenance of Structures | OM831 | F003 | - | - | - | - |
| 341 | 832 | Maintenance of Reservoirs | OM832 | F003 | - | - | - | - |
| 342 | 833 | Maintenance of Lines | OM833 | F003 | - | - | - | - |
| 343 | 834 | Main of Compressor Station Equipment | OM834 | F004 | - | - | - | - |
| 344 | 835 | Main of Meas and Reg Sta. Equip | OM835 | F003 | - | - | - | - |
| 345 | 836 | Main of Purification Equip | OM836 | F004 | - | - | - | - |
| 346 | 837 | Main of Other Equipment | OM837 | F003 | - | - | - | - |
| 347 | | | | | | | | |
| 348 | Total Maintenance Expense | OMME | \$ | - | \$ | - | \$ | - |
| 349 | | | | | | | | |
| 350 | | | | | | | | |
| 351 | Total Storage Expense | OMS | | - | - | - | - | - |
| 352 | | | | | | | | |
| 353 | | | | | | | | |
| 354 | | | | | | | | |
| 355 | | | | | | | | |

LOUISVILLE GAS AND ELECTRIC COMPANY

Cost of Service Study
12 Months Ended June 30, 2022

Functional Assignment and Classification

| | A | B | C | D | E | F | G | H | I | J | K | L | | |
|-----|---|---------------------------------------|----------|--------|----|---------------|--------------------|-----------------------|----------------|-------------------|---|-------------------------------------|----|-----------|
| 1 | | | | | | | | | | | | | | |
| 2 | Description | Name | Vector | | | Total Company | Procurement Demand | Procurement Commodity | Storage Demand | Storage Commodity | Transmission Non-Storage Related Demand | Transmission Storage Related Demand | | |
| 3 | | | | | | | | | | | | | | |
| 356 | | | | | | | | | | | | | | |
| 357 | Operation & Maintenance Expenses (Continued) | | | | | | | | | | | | | |
| 358 | | | | | | | | | | | | | | |
| 359 | | | | | | | | | | | | | | |
| 360 | Transmission | | | | | | | | | | | | | |
| 361 | 850-867 | Transmission Expenses | OM850 | F005 | \$ | 18,074,099 | - | - | - | - | 15,102,338 | 2,971,761 | | |
| 362 | | | | | | | | | | | | | | |
| 363 | Distribution Expenses | | | | | | | | | | | | | |
| 364 | Operation | | | | | | | | | | | | | |
| 365 | 870 | Operation Supr and Engr | OM870 | DOES | \$ | - | - | - | - | - | - | - | | |
| 366 | 871 | Dist Load Dispatching | OM871 | F007 | | 1,075,433 | - | - | - | - | - | - | | |
| 367 | 872 | Compr. Station Labor and Exp. | OM872 | F007 | | - | - | - | - | - | - | - | | |
| 368 | 873 | Compr. Station Fuel and Power | OM873 | F007 | | - | - | - | - | - | - | - | | |
| 369 | 874.01 | Other Mains/Serv. Expenses | OM874.01 | CADAL | | 9,885,996 | - | - | - | - | - | - | | |
| 370 | 874.02 | Leak Survey-Mains | OM874.02 | F009 | | - | - | - | - | - | - | - | | |
| 371 | 874.03 | Leak Survey - Service | OM874.03 | F010 | | - | - | - | - | - | - | - | | |
| 372 | 874.04 | Locate Main per Request | OM874.04 | CADAL | | - | - | - | - | - | - | - | | |
| 373 | 874.05 | Check Stop Box Access | OM874.05 | F010 | | - | - | - | - | - | - | - | | |
| 374 | 874.06 | Patrolling Mains | OM874.06 | F009 | | - | - | - | - | - | - | - | | |
| 375 | 874.07 | Check/Grease Valves | OM874.07 | F009 | | - | - | - | - | - | - | - | | |
| 376 | 874.08 | Opr. Odor Equipment | OM874.08 | F007 | | - | - | - | - | - | - | - | | |
| 377 | 874.09 | Locate and Inspect Valve Boxes | OM874.09 | F009 | | - | - | - | - | - | - | - | | |
| 378 | 874.1 | Cut Grass - Right of Way | OM874.10 | F009 | | - | - | - | - | - | - | - | | |
| 379 | 875 | Meas and Reg Station Exp.- General | OM875 | F008 | | 1,439,892 | - | - | - | - | - | - | | |
| 380 | 876 | Meas and Reg Station Exp.- Industrial | OM876 | F011 | | 649,731 | - | - | - | - | - | - | | |
| 381 | 877 | Meas and Reg Station Exp. - City Gate | OM877 | F008 | | 269,704 | - | - | - | - | - | - | | |
| 382 | 878 | Meter and House Reg. Expense | OM878 | F011 | | 2,254,644 | - | - | - | - | - | - | | |
| 383 | 879 | Customer Installation Expense | OM879 | F011 | | 234,605 | - | - | - | - | - | - | | |
| 384 | 880 | Other Expenses | OM880 | PTDSUB | | 7,923,534 | - | - | - | - | - | - | | |
| 385 | 881 | Rents | OM881 | PTDSUB | | 26,536 | - | - | - | - | - | - | | |
| 386 | | | | | | | | | | | | | | |
| 387 | Total Operations Distribution Expense | | OMDO | | \$ | 23,760,075 | - | - | - | - | - | - | | |
| 388 | | | | | | | | | | | | | | |
| 389 | Total Transmission and Distribution Oper Exp | | OMTDO | | \$ | 41,834,174 | \$ | - | \$ | - | \$ | 15,102,338 | \$ | 2,971,761 |
| 390 | | | | | | | | | | | | | | |
| 391 | | | | | | | | | | | | | | |
| 392 | | | | | | | | | | | | | | |
| 393 | | | | | | | | | | | | | | |
| 394 | | | | | | | | | | | | | | |
| 395 | | | | | | | | | | | | | | |
| 396 | | | | | | | | | | | | | | |
| 397 | | | | | | | | | | | | | | |
| 398 | | | | | | | | | | | | | | |

LOUISVILLE GAS AND ELECTRIC COMPANY

Cost of Service Study
12 Months Ended June 30, 2022

Functional Assignment and Classification

| | A | B | C | D | M | N | O | P | Q | R | | | |
|-----|---|---------------------------------------|----------|-----------|--------------------|----------------------------|------------------------------|----------------------|------------------------|----------------------|---------|----|---------|
| 1 | | | | | Distribution | Distribution Structures | Distribution Mains - | Distribution Mains - | Distribution Mains - | Distribution Mains - | | | |
| 2 | Description | Name | Vector | Commodity | & Equipment Demand | Low & Med. Pressure Demand | Low & Med. Pressure Customer | High Pressure Demand | High Pressure Customer | | | | |
| 3 | | | | | | | | | | | | | |
| 356 | | | | | | | | | | | | | |
| 357 | Operation & Maintenance Expenses (Continued) | | | | | | | | | | | | |
| 358 | | | | | | | | | | | | | |
| 359 | | | | | | | | | | | | | |
| 360 | Transmission | | | | | | | | | | | | |
| 361 | 850-867 | Transmission Expenses | OM850 | F005 | - | - | - | - | - | - | | | |
| 362 | | | | | | | | | | | | | |
| 363 | Distribution Expenses | | | | | | | | | | | | |
| 364 | Operation | | | | | | | | | | | | |
| 365 | 870 | Operation Supr and Engr | OM870 | DOES | - | - | - | - | - | - | | | |
| 366 | 871 | Dist Load Dispatching | OM871 | F007 | 1,075,433 | - | - | - | - | - | | | |
| 367 | 872 | Compr. Station Labor and Exp. | OM872 | F007 | - | - | - | - | - | - | | | |
| 368 | 873 | Compr. Station Fuel and Power | OM873 | F007 | - | - | - | - | - | - | | | |
| 369 | 874.01 | Other Mains/Serv. Expenses | OM874.01 | CADAL | - | - | 1,507,846 | 3,310,059 | 261,762 | 236,209 | | | |
| 370 | 874.02 | Leak Survey-Mains | OM874.02 | F009 | - | - | - | - | - | - | | | |
| 371 | 874.03 | Leak Survey - Service | OM874.03 | F010 | - | - | - | - | - | - | | | |
| 372 | 874.04 | Locate Main per Request | OM874.04 | CADAL | - | - | - | - | - | - | | | |
| 373 | 874.05 | Check Stop Box Access | OM874.05 | F010 | - | - | - | - | - | - | | | |
| 374 | 874.06 | Patrolling Mains | OM874.06 | F009 | - | - | - | - | - | - | | | |
| 375 | 874.07 | Check/Grease Valves | OM874.07 | F009 | - | - | - | - | - | - | | | |
| 376 | 874.08 | Opr. Odor Equipment | OM874.08 | F007 | - | - | - | - | - | - | | | |
| 377 | 874.09 | Locate and Inspect Valve Boxes | OM874.09 | F009 | - | - | - | - | - | - | | | |
| 378 | 874.1 | Cut Grass - Right of Way | OM874.10 | F009 | - | - | - | - | - | - | | | |
| 379 | 875 | Meas and Reg Station Exp.- General | OM875 | F008 | - | 1,439,892 | - | - | - | - | | | |
| 380 | 876 | Meas and Reg Station Exp.- Industrial | OM876 | F011 | - | - | - | - | - | - | | | |
| 381 | 877 | Meas and Reg Station Exp. - City Gate | OM877 | F008 | - | 269,704 | - | - | - | - | | | |
| 382 | 878 | Meter and House Reg. Expense | OM878 | F011 | - | - | - | - | - | - | | | |
| 383 | 879 | Customer Installation Expense | OM879 | F011 | - | - | - | - | - | - | | | |
| 384 | 880 | Other Expenses | OM880 | PTDSUB | - | 472,187 | 1,023,241 | 2,246,242 | 177,634 | 160,294 | | | |
| 385 | 881 | Rents | OM881 | PTDSUB | - | 1,581 | 3,427 | 7,523 | 595 | 537 | | | |
| 386 | | | | | | | | | | | | | |
| 387 | Total Operations Distribution Expense | | OMDO | | 1,075,433 | 2,183,364 | 2,534,514 | 5,563,824 | 439,991 | 397,039 | | | |
| 388 | | | | | | | | | | | | | |
| 389 | Total Transmission and Distribution Oper Exp | | OMTDO | \$ | 1,075,433 | \$ | 2,183,364 | \$ | 5,563,824 | \$ | 439,991 | \$ | 397,039 |
| 390 | | | | | | | | | | | | | |
| 391 | | | | | | | | | | | | | |
| 392 | | | | | | | | | | | | | |
| 393 | | | | | | | | | | | | | |
| 394 | | | | | | | | | | | | | |
| 395 | | | | | | | | | | | | | |
| 396 | | | | | | | | | | | | | |
| 397 | | | | | | | | | | | | | |
| 398 | | | | | | | | | | | | | |

LOUISVILLE GAS AND ELECTRIC COMPANY

Cost of Service Study
12 Months Ended June 30, 2022

Functional Assignment and Classification

| | A | B | C | D | S | T | U | V |
|-----|---|---------------------------------------|----------|-------------------|-----------------|----------------------------|-----------------------------------|----|
| 1 | | | | | | | | |
| 2 | Description | Name | Vector | Services Customer | Meters Customer | Customer Accounts Customer | Customer Service Expense Customer | |
| 3 | | | | | | | | |
| 356 | | | | | | | | |
| 357 | Operation & Maintenance Expenses (Continued) | | | | | | | |
| 358 | | | | | | | | |
| 359 | | | | | | | | |
| 360 | Transmission | | | | | | | |
| 361 | 850-867 | Transmission Expenses | OM850 | F005 | - | - | - | - |
| 362 | | | | | | | | |
| 363 | Distribution Expenses | | | | | | | |
| 364 | Operation | | | | | | | |
| 365 | 870 | Operation Supr and Engr | OM870 | DOES | - | - | - | - |
| 366 | 871 | Dist Load Dispatching | OM871 | F007 | - | - | - | - |
| 367 | 872 | Compr. Station Labor and Exp. | OM872 | F007 | - | - | - | - |
| 368 | 873 | Compr. Station Fuel and Power | OM873 | F007 | - | - | - | - |
| 369 | 874.01 | Other Mains/Serv. Expenses | OM874.01 | CADAL | 4,570,120 | - | - | - |
| 370 | 874.02 | Leak Survey-Mains | OM874.02 | F009 | - | - | - | - |
| 371 | 874.03 | Leak Survey - Service | OM874.03 | F010 | - | - | - | - |
| 372 | 874.04 | Locate Main per Request | OM874.04 | CADAL | - | - | - | - |
| 373 | 874.05 | Check Stop Box Access | OM874.05 | F010 | - | - | - | - |
| 374 | 874.06 | Patrolling Mains | OM874.06 | F009 | - | - | - | - |
| 375 | 874.07 | Check/Grease Valves | OM874.07 | F009 | - | - | - | - |
| 376 | 874.08 | Opr. Odor Equipment | OM874.08 | F007 | - | - | - | - |
| 377 | 874.09 | Locate and Inspect Valve Boxes | OM874.09 | F009 | - | - | - | - |
| 378 | 874.1 | Cut Grass - Right of Way | OM874.10 | F009 | - | - | - | - |
| 379 | 875 | Meas and Reg Station Exp.- General | OM875 | F008 | - | - | - | - |
| 380 | 876 | Meas and Reg Station Exp.- Industrial | OM876 | F011 | - | 649,731 | - | - |
| 381 | 877 | Meas and Reg Station Exp. - City Gate | OM877 | F008 | - | - | - | - |
| 382 | 878 | Meter and House Reg. Expense | OM878 | F011 | - | 2,254,644 | - | - |
| 383 | 879 | Customer Installation Expense | OM879 | F011 | - | 234,605 | - | - |
| 384 | 880 | Other Expenses | OM880 | PTDSUB | 3,101,333 | 742,603 | - | - |
| 385 | 881 | Rents | OM881 | PTDSUB | 10,386 | 2,487 | - | - |
| 386 | | | | | | | | |
| 387 | Total Operations Distribution Expense | | OMDO | | 7,681,839 | 3,884,070 | - | - |
| 388 | | | | | | | | |
| 389 | Total Transmission and Distribution Oper Exp | | OMTDO | \$ | 7,681,839 | \$ | 3,884,070 | \$ |
| 390 | | | | | | | | |
| 391 | | | | | | | | |
| 392 | | | | | | | | |
| 393 | | | | | | | | |
| 394 | | | | | | | | |
| 395 | | | | | | | | |
| 396 | | | | | | | | |
| 397 | | | | | | | | |
| 398 | | | | | | | | |

LOUISVILLE GAS AND ELECTRIC COMPANY

Cost of Service Study
12 Months Ended June 30, 2022

Functional Assignment and Classification

| | A | B | C | D | E | F | G | H | I | J | K | L |
|-----|---|---------------------------------------|--------|--------|----|---------------|--------------------|-----------------------|----------------|-------------------|---|-------------------------------------|
| 1 | | | | | | | | | | | | |
| 2 | Description | Name | Vector | | | Total Company | Procurement Demand | Procurement Commodity | Storage Demand | Storage Commodity | Transmission Non-Storage Related Demand | Transmission Storage Related Demand |
| 3 | | | | | | | | | | | | |
| 399 | | | | | | | | | | | | |
| 400 | Operation & Maintenance Expenses (Continued) | | | | | | | | | | | |
| 401 | | | | | | | | | | | | |
| 402 | | | | | | | | | | | | |
| 403 | Maintenance Expense -- Distribution | | | | | | | | | | | |
| 404 | | | | | | | | | | | | |
| 405 | 885 | Maintenance Supr and Engr | OM885 | DMES | | - | - | - | - | - | - | - |
| 406 | 886 | Maintenance Structures | OM886 | F008 | | - | - | - | - | - | - | - |
| 407 | 887 | Maintenance Mains | OM887 | F009 | | 12,032,879 | - | - | - | - | - | - |
| 408 | 888 | Maintenance Comp. Station Equip. | OM888 | F007 | | - | - | - | - | - | - | - |
| 409 | 889 | Maintenance Meas and Reg. General | OM889 | F008 | | 175,037 | - | - | - | - | - | - |
| 410 | 890 | Maintenance Meas and Reg - Industrial | OM890 | F011 | | 305,563 | - | - | - | - | - | - |
| 411 | 891 | Maintenance Meas and Reg.-City Gate | OM891 | F008 | | 916,558 | - | - | - | - | - | - |
| 412 | 892 | Maintenance Services | OM892 | F010 | | 874,567 | - | - | - | - | - | - |
| 413 | 893 | Maintenance Meters and House Reg. | OM893 | F011 | | - | - | - | - | - | - | - |
| 414 | 894 | Maintenance Other Equipment | OM894 | PTDSUB | | 560,259 | - | - | - | - | - | - |
| 415 | | | | | | | | | | | | |
| 416 | Total Maintenance Expenses | OMME | | | \$ | 14,864,863 | \$ | - | \$ | - | \$ | - |
| 417 | | | | | | | | | | | | |
| 418 | Total Transmission & Distribution Expenses | OMDE | | | \$ | 56,699,037 | \$ | - | \$ | - | \$ | 15,102,338 |
| 419 | | | | | | | | | | | | |
| 420 | | | | | | | | | | | | |
| 421 | Customer Accounts Expense | | | | | | | | | | | |
| 422 | 901 | Supervision | OM901 | F012 | | 1,177,715 | - | - | - | - | - | - |
| 423 | 902 | Meter Reading | OM902 | F012 | | 3,001,871 | - | - | - | - | - | - |
| 424 | 903 | Customer Records and Collections | OM903 | F012 | | 6,230,561 | - | - | - | - | - | - |
| 425 | 904 | Uncollectible Accounts | OM904 | F012 | | 471,666 | - | - | - | - | - | - |
| 426 | 905 | Misc. Cust Account Expenses | OM905 | F012 | | - | - | - | - | - | - | - |
| 427 | | | | | | | | | | | | |
| 428 | Total Customer Accounts Expense | OMCA | | | \$ | 10,881,813 | \$ | - | \$ | - | \$ | - |
| 429 | | | | | | | | | | | | |
| 430 | Customer Service Expenses | | | | | | | | | | | |
| 431 | 907-910 | Customer Service | OM907 | F013 | \$ | 1,302,017 | - | - | - | - | - | - |
| 432 | | | | | | | | | | | | |
| 433 | Sales Expenses | | | | | | | | | | | |
| 434 | 911-916 | Sales Expenses | OM911 | F013 | \$ | 15,840 | - | - | - | - | - | - |
| 435 | | | | | | | | | | | | |
| 436 | | | | | | | | | | | | |
| 437 | | | | | | | | | | | | |
| 438 | | | | | | | | | | | | |
| 439 | | | | | | | | | | | | |
| 440 | | | | | | | | | | | | |
| 441 | | | | | | | | | | | | |

LOUISVILLE GAS AND ELECTRIC COMPANY

Cost of Service Study
12 Months Ended June 30, 2022

Functional Assignment and Classification

| | A | B | C | D | S | T | U | V |
|-----|---|---------------------------------------|--------|----------------------|--------------------|-------------------------------|---|------------------|
| 1 | | | | | | | | Customer Service |
| 2 | Description | Name | Vector | Services Customer | Meters Customer | Customer Accounts Customer | Customer Service Expense Customer | |
| 3 | | | | | | | | |
| 399 | | | | | | | | |
| 400 | Operation & Maintenance Expenses (Continued) | | | | | | | |
| 401 | | | | | | | | |
| 402 | | | | | | | | |
| 403 | Maintenance Expense -- Distribution | | | | | | | |
| 404 | | | | | | | | |
| 405 | 885 | Maintenance Supr and Engr | OM885 | DMES | - | - | - | - |
| 406 | 886 | Maintenance Structures | OM886 | F008 | - | - | - | - |
| 407 | 887 | Maintenance Mains | OM887 | F009 | - | - | - | - |
| 408 | 888 | Maintenance Comp. Station Equip. | OM888 | F007 | - | - | - | - |
| 409 | 889 | Maintenance Meas and Reg. General | OM889 | F008 | - | - | - | - |
| 410 | 890 | Maintenance Meas and Reg - Industrial | OM890 | F011 | - | 305,563 | - | - |
| 411 | 891 | Maintenance Meas and Reg.-City Gate | OM891 | F008 | - | - | - | - |
| 412 | 892 | Maintenance Services | OM892 | F010 | 874,567 | - | - | - |
| 413 | 893 | Maintenance Meters and House Reg. | OM893 | F011 | - | - | - | - |
| 414 | 894 | Maintenance Other Equipment | OM894 | PTDSUB | 219,290 | 52,508 | - | - |
| 415 | | | | | | | | |
| 416 | Total Maintenance Expenses | OMME | | \$ | 1,093,857 | \$ | 358,071 | \$ |
| 417 | | | | | | | | |
| 418 | Total Transmission & Distribution Expenses | OMDE | | \$ | 8,775,696 | \$ | 4,242,141 | \$ |
| 419 | | | | | | | | |
| 420 | | | | | | | | |
| 421 | Customer Accounts Expense | | | | | | | |
| 422 | 901 | Supervision | OM901 | F012 | - | - | 1,177,715 | - |
| 423 | 902 | Meter Reading | OM902 | F012 | - | - | 3,001,871 | - |
| 424 | 903 | Customer Records and Collections | OM903 | F012 | - | - | 6,230,561 | - |
| 425 | 904 | Uncollectible Accounts | OM904 | F012 | - | - | 471,666 | - |
| 426 | 905 | Misc. Cust Account Expenses | OM905 | F012 | - | - | - | - |
| 427 | | | | | | | | |
| 428 | Total Customer Accounts Expense | OMCA | | \$ | - | \$ | - | \$ |
| 429 | | | | | | | | |
| 430 | Customer Service Expenses | | | | | | | |
| 431 | 907-910 | Customer Service | OM907 | F013 | - | - | - | 1,302,017 |
| 432 | | | | | | | | |
| 433 | Sales Expenses | | | | | | | |
| 434 | 911-916 | Sales Expenses | OM911 | F013 | - | - | - | 15,840 |
| 435 | | | | | | | | |
| 436 | | | | | | | | |
| 437 | | | | | | | | |
| 438 | | | | | | | | |
| 439 | | | | | | | | |
| 440 | | | | | | | | |
| 441 | | | | | | | | |

LOUISVILLE GAS AND ELECTRIC COMPANY

Cost of Service Study
12 Months Ended June 30, 2022

Functional Assignment and Classification

| | A | B | C | D | S | T | U | V |
|-----|---|--------------------------------|---------|----------------------|--------------------|-------------------------------|---|------------------|
| 1 | | | | | | | | Customer Service |
| 2 | Description | Name | Vector | Services Customer | Meters Customer | Customer Accounts Customer | Customer Service Expense Customer | |
| 3 | | | | | | | | |
| 442 | | | | | | | | |
| 443 | Operation & Maintenance Expenses (Continued) | | | | | | | |
| 444 | | | | | | | | |
| 445 | | | | | | | | |
| 446 | Administrative & General | | | | | | | |
| 447 | 920 | Admin and General Salaries | OM920 | LBSUB | 850,215 | 689,567 | 1,341,610 | 82,589 |
| 448 | 921 | Office Supplies and Expense | OM921 | LBSUB | 249,805 | 202,605 | 394,184 | 24,266 |
| 449 | 922 | Admin. Expenses Transferred | OM922 | LBSUB | (131,935) | (107,006) | (208,189) | (12,816) |
| 450 | 923 | Outside Services Employed | OM923 | LBSUB | 562,976 | 456,601 | 888,356 | 54,687 |
| 451 | 924 | Property Insurance | OM924 | PTT | 127,806 | 30,603 | - | - |
| 452 | 925 | Injuries and Damages | OM925 | LBSUB | 113,964 | 92,431 | 179,832 | 11,070 |
| 453 | 926 | Employee Pensions and Benefits | OM926 | LBSUB | 927,625 | 752,350 | 1,463,760 | 90,108 |
| 454 | 927 | Franchise Requirement | OM927 | PTT | - | - | - | - |
| 455 | 928 | Regulatory Commission Fee | OM928 | PTT | 13,935 | 3,337 | - | - |
| 456 | 929 | Duplicate Charges -Credit | OM929 | LBSUB | (24,727) | (20,055) | (39,019) | (2,402) |
| 457 | 930.1 | General Advertising Expense | OM930.1 | PTT | - | - | - | - |
| 458 | 930.2 | Misc. General Expense | OM930.2 | LBSUB | 38,786 | 31,457 | 61,203 | 3,768 |
| 459 | 931 | Rents | OM931 | PTT | 163,983 | 39,265 | - | - |
| 460 | 935 | Maintenance of General Plant | OM935 | PT389 | 133,487 | 31,963 | - | - |
| 461 | | | | | | | | |
| 462 | Total Administrative and General Expense | | OMAGT | \$ | 3,025,920 | \$ 2,203,117 | \$ 4,081,738 | \$ 251,269 |
| 463 | | | | | | | | |
| 464 | Total Operation & Maintenance Expense | | OMT | \$ | 11,801,616 | \$ 6,445,258 | \$ 14,963,550 | \$ 1,569,126 |
| 465 | | | | | | | | |
| 466 | | | | | \$ | 53,537,067 | | |
| 467 | | | | | | | | |
| 468 | | | | | | | | |
| 469 | | | | | | | | |
| 470 | | | | | | | | |
| 471 | | | | | | | | |
| 472 | | | | | | | | |
| 473 | | | | | | | | |
| 474 | | | | | | | | |
| 475 | | | | | | | | |
| 476 | | | | | | | | |
| 477 | | | | | | | | |
| 478 | | | | | | | | |
| 479 | | | | | | | | |
| 480 | | | | | | | | |
| 481 | | | | | | | | |
| 482 | | | | | | | | |
| 483 | | | | | | | | |
| 484 | | | | | | | | |

LOUISVILLE GAS AND ELECTRIC COMPANY

Cost of Service Study
12 Months Ended June 30, 2022

Functional Assignment and Classification

| | A | B | C | D | E | F | G | H | I | J | K | L |
|-----|---|---|--------|-------|----|---------------|--------------------|-----------------------|----------------|-------------------|---|-------------------------------------|
| 1 | | | | | | | | | | | | |
| 2 | Description | Name | Vector | | | Total Company | Procurement Demand | Procurement Commodity | Storage Demand | Storage Commodity | Transmission Non-Storage Related Demand | Transmission Storage Related Demand |
| 3 | | | | | | | | | | | | |
| 485 | | | | | | | | | | | | |
| 486 | Depreciation Expenses | | | | | | | | | | | |
| 487 | | | | | | | | | | | | |
| 488 | | | | | | | | | | | | |
| 489 | Underground Storage | | | | | | | | | | | |
| 490 | 350-357 | Underground Storage Plant | DP350 | F003 | \$ | 4,721,312 | - | - | 4,721,312 | - | - | - |
| 491 | 358 | Asset Retire Obligation Gas Plant | DP350 | F003 | \$ | - | - | - | - | - | - | - |
| 492 | | | | | | | | | | | | |
| 493 | Total Underground Storage | | | | \$ | 4,721,312 | - | - | 4,721,312 | - | - | - |
| 494 | | | | | | | | | | | | |
| 495 | Transmission | | | | | | | | | | | |
| 496 | 365-372 | Transmission Plant | DP365 | F005 | \$ | 4,587,139 | - | - | - | - | 3,832,917 | 754,222 |
| 497 | | | | | | | | | | | | |
| 498 | Distribution | | | | | | | | | | | |
| 499 | 374 | Land & Land Rights | DP374 | F008 | \$ | - | - | - | - | - | - | - |
| 500 | 375 | Structures & Improvements | DP375 | F008 | | 40,931 | - | - | - | - | - | - |
| 501 | 376 | Mains | DP376 | F009 | | 7,967,684 | - | - | - | - | - | - |
| 502 | 378 | Meas & Reg Station Eq.-Gen | DP378 | F008 | | 947,875 | - | - | - | - | - | - |
| 503 | 379 | Meas & Reg Station Eq.-City Gate | DP379 | F008 | | 345,460 | - | - | - | - | - | - |
| 504 | 380 | Services | DP380 | F010 | | 13,695,647 | - | - | - | - | - | - |
| 505 | 381 | Meters | DP381 | F011 | | 2,659,640 | - | - | - | - | - | - |
| 506 | 382 | Meter Installations | DP382 | F011 | | - | - | - | - | - | - | - |
| 507 | 383 | House Regulators | DP383 | F011 | | 1,041,174 | - | - | - | - | - | - |
| 508 | 384 | House Regulator Installations | DP384 | F011 | | - | - | - | - | - | - | - |
| 509 | 385 | Industrial Meas & Reg Equipment | DP385 | F011 | | 49,860 | - | - | - | - | - | - |
| 510 | 387 | Other Equipment | DP387 | F011 | | 38,227 | - | - | - | - | - | - |
| 511 | 388 | Asset Retire Obligation Gas Plant-City Gate | DP388 | F008 | | - | - | - | - | - | - | - |
| 512 | 388 | Asset Retire Obligation Gas Plant-Mains | DP388 | F009 | | - | - | - | - | - | - | - |
| 513 | | | | | | | | | | | | |
| 514 | Total Distribution | | | | \$ | 26,786,499 | \$ | - | \$ | - | \$ | - |
| 515 | | | | | | | | | | | | |
| 516 | 117 | Gas Stored Underground | DP117 | F003 | \$ | - | - | - | - | - | - | - |
| 517 | 301-303 | Intangible Plant | DP301 | PTSUB | | 48 | - | - | 6 | - | 6 | 1 |
| 518 | 389-399 | General Plant | DP389 | PTSUB | | 470,124 | - | - | 61,974 | - | 58,463 | 11,504 |
| 519 | Common Utility Plant | | DPCP | PTSUB | | 10,749,764 | - | - | 1,417,089 | - | 1,336,814 | 263,051 |
| 520 | Common Utility Plant Amortization | | DPCP | PTSUB | | - | - | - | - | - | - | - |
| 521 | | | | | | | | | | | | |
| 522 | Total Depreciation Expense | | DEPREX | | \$ | 47,314,886 | \$ | - | \$ | 6,200,382 | \$ | 5,228,200 |
| 523 | | | | | | | | | | | | |
| 524 | | | | | \$ | 36,565,122 | | | | | | |
| 525 | Regulatory Credits and Accretion | | | | | | | | | | | |
| 526 | | | | | | | | | | | | |
| 527 | Regulatory Credits | | REGCR | PTSUB | \$ | - | - | - | - | - | - | - |
| 528 | | | | | | | | | | | | |
| 529 | Accretion | | ACCRE | PTSUB | \$ | - | - | - | - | - | - | - |
| 530 | | | | | | | | | | | | |
| 531 | Amortization of Investment Tax Credits | | ITCAM | PTSUB | \$ | (584) | - | - | (77) | - | (73) | (14) |
| 532 | | | | | | | | | | | | |
| 533 | | | | | | | | | | | | |

LOUISVILLE GAS AND ELECTRIC COMPANY

Cost of Service Study
12 Months Ended June 30, 2022

Functional Assignment and Classification

| | A | B | C | D | M | N | O | P | Q | R | | | | | | | |
|-----|---|---|--------|-----------|--------------------|----------------------------|------------------------------|----------------------|------------------------|----------------------|-----------|-----------|-----------|---------|---------|---------|---------|
| 1 | | | | | Distribution | Distribution Structures | Distribution Mains - | Distribution Mains - | Distribution Mains - | Distribution Mains - | | | | | | | |
| 2 | Description | Name | Vector | Commodity | & Equipment Demand | Low & Med. Pressure Demand | Low & Med. Pressure Customer | High Pressure Demand | High Pressure Customer | | | | | | | | |
| 3 | | | | | | | | | | | | | | | | | |
| 485 | | | | | | | | | | | | | | | | | |
| 486 | Depreciation Expenses | | | | | | | | | | | | | | | | |
| 487 | | | | | | | | | | | | | | | | | |
| 488 | | | | | | | | | | | | | | | | | |
| 489 | Underground Storage | | | | | | | | | | | | | | | | |
| 490 | 350-357 | Underground Storage Plant | DP350 | F003 | - | - | - | - | - | - | | | | | | | |
| 491 | 358 | Asset Retire Obligation Gas Plant | DP350 | F003 | - | - | - | - | - | - | | | | | | | |
| 492 | | | | | | | | | | | | | | | | | |
| 493 | Total Underground Storage | | | | - | - | - | - | - | - | | | | | | | |
| 494 | | | | | | | | | | | | | | | | | |
| 495 | Transmission | | | | | | | | | | | | | | | | |
| 496 | 365-372 | Transmission Plant | DP365 | F005 | - | - | - | - | - | - | | | | | | | |
| 497 | | | | | | | | | | | | | | | | | |
| 498 | Distribution | | | | | | | | | | | | | | | | |
| 499 | 374 | Land & Land Rights | DP374 | F008 | - | - | - | - | - | - | | | | | | | |
| 500 | 375 | Structures & Improvements | DP375 | F008 | - | 40,931 | - | - | - | - | | | | | | | |
| 501 | 376 | Mains | DP376 | F009 | - | - | 2,260,031 | 4,961,273 | 392,341 | 354,040 | | | | | | | |
| 502 | 378 | Meas & Reg Station Eq.-Gen | DP378 | F008 | - | 947,875 | - | - | - | - | | | | | | | |
| 503 | 379 | Meas & Reg Station Eq.-City Gate | DP379 | F008 | - | 345,460 | - | - | - | - | | | | | | | |
| 504 | 380 | Services | DP380 | F010 | - | - | - | - | - | - | | | | | | | |
| 505 | 381 | Meters | DP381 | F011 | - | - | - | - | - | - | | | | | | | |
| 506 | 382 | Meter Installations | DP382 | F011 | - | - | - | - | - | - | | | | | | | |
| 507 | 383 | House Regulators | DP383 | F011 | - | - | - | - | - | - | | | | | | | |
| 508 | 384 | House Regulator Installations | DP384 | F011 | - | - | - | - | - | - | | | | | | | |
| 509 | 385 | Industrial Meas & Reg Equipment | DP385 | F011 | - | - | - | - | - | - | | | | | | | |
| 510 | 387 | Other Equipment | DP387 | F011 | - | - | - | - | - | - | | | | | | | |
| 511 | 388 | Asset Retire Obligation Gas Plant-City Gate | DP388 | F008 | - | - | - | - | - | - | | | | | | | |
| 512 | 388 | Asset Retire Obligation Gas Plant-Mains | DP388 | F009 | - | - | - | - | - | - | | | | | | | |
| 513 | | | | | | | | | | | | | | | | | |
| 514 | Total Distribution | | | | \$ | - | \$ | 1,334,265 | \$ | 2,260,031 | \$ | 4,961,273 | \$ | 392,341 | \$ | 354,040 | |
| 515 | | | | | | | | | | | | | | | | | |
| 516 | 117 | Gas Stored Underground | DP117 | F003 | - | - | - | - | - | - | | | | | | | |
| 517 | 301-303 | Intangible Plant | DP301 | PTSUB | - | 2 | 4 | 10 | 1 | 1 | | | | | | | |
| 518 | 389-399 | General Plant | DP389 | PTSUB | - | 20,153 | 43,673 | 95,871 | 7,582 | 6,841 | | | | | | | |
| 519 | Common Utility Plant | | DPCP | PTSUB | - | 460,821 | 998,611 | 2,192,174 | 173,359 | 156,435 | | | | | | | |
| 520 | Common Utility Plant Amortization | | DPCP | PTSUB | - | - | - | - | - | - | | | | | | | |
| 521 | | | | | | | | | | | | | | | | | |
| 522 | Total Depreciation Expense | | | | DEPREX | \$ | - | \$ | 1,815,242 | \$ | 3,302,319 | \$ | 7,249,328 | \$ | 573,282 | \$ | 517,318 |
| 523 | | | | | | | | | | | | | | | | | |
| 524 | | | | | | | | | | | | | | | | | |
| 525 | Regulatory Credits and Accretion | | | | | | | | | | | | | | | | |
| 526 | | | | | | | | | | | | | | | | | |
| 527 | Regulatory Credits | | REGCR | PTSUB | - | - | - | - | - | - | | | | | | | |
| 528 | | | | | | | | | | | | | | | | | |
| 529 | Accretion | | ACCRE | PTSUB | - | - | - | - | - | - | | | | | | | |
| 530 | | | | | | | | | | | | | | | | | |
| 531 | Amortization of Investment Tax Credits | | | | ITCAM | PTSUB | - | (25) | (54) | (119) | (9) | (8) | | | | | |
| 532 | | | | | | | | | | | | | | | | | |
| 533 | | | | | | | | | | | | | | | | | |

LOUISVILLE GAS AND ELECTRIC COMPANY

Cost of Service Study
12 Months Ended June 30, 2022

Functional Assignment and Classification

| | A | B | C | D | S | T | U | V |
|-----|---|---|--------|-------------------|----------------------|----------------------------|-----------------------------------|------|
| 1 | | | | | | | | |
| 2 | Description | Name | Vector | Services Customer | Meters Customer | Customer Accounts Customer | Customer Service Expense Customer | |
| 3 | | | | | | | | |
| 485 | | | | | | | | |
| 486 | Depreciation Expenses | | | | | | | |
| 487 | | | | | | | | |
| 488 | | | | | | | | |
| 489 | Underground Storage | | | | | | | |
| 490 | 350-357 | Underground Storage Plant | DP350 | F003 | - | - | - | - |
| 491 | 358 | Asset Retire Obligation Gas Plant | DP350 | F003 | - | - | - | - |
| 492 | | | | | | | | |
| 493 | Total Underground Storage | | | | - | - | - | - |
| 494 | | | | | | | | |
| 495 | Transmission | | | | | | | |
| 496 | 365-372 | Transmission Plant | DP365 | F005 | - | - | - | - |
| 497 | | | | | | | | |
| 498 | Distribution | | | | | | | |
| 499 | 374 | Land & Land Rights | DP374 | F008 | - | - | - | - |
| 500 | 375 | Structures & Improvements | DP375 | F008 | - | - | - | - |
| 501 | 376 | Mains | DP376 | F009 | - | - | - | - |
| 502 | 378 | Meas & Reg Station Eq.-Gen | DP378 | F008 | - | - | - | - |
| 503 | 379 | Meas & Reg Station Eq.-City Gate | DP379 | F008 | - | - | - | - |
| 504 | 380 | Services | DP380 | F010 | 13,695,647 | - | - | - |
| 505 | 381 | Meters | DP381 | F011 | - | 2,659,640 | - | - |
| 506 | 382 | Meter Installations | DP382 | F011 | - | - | - | - |
| 507 | 383 | House Regulators | DP383 | F011 | - | 1,041,174 | - | - |
| 508 | 384 | House Regulator Installations | DP384 | F011 | - | - | - | - |
| 509 | 385 | Industrial Meas & Reg Equipment | DP385 | F011 | - | 49,860 | - | - |
| 510 | 387 | Other Equipment | DP387 | F011 | - | 38,227 | - | - |
| 511 | 388 | Asset Retire Obligation Gas Plant-City Gate | DP388 | F008 | - | - | - | - |
| 512 | 388 | Asset Retire Obligation Gas Plant-Mains | DP388 | F009 | - | - | - | - |
| 513 | | | | | | | | |
| 514 | Total Distribution | | | | \$ 13,695,647 | \$ 3,788,902 | \$ - | \$ - |
| 515 | | | | | | | | |
| 516 | 117 | Gas Stored Underground | DP117 | F003 | - | - | - | - |
| 517 | 301-303 | Intangible Plant | DP301 | PTSUB | 14 | 3 | - | - |
| 518 | 389-399 | General Plant | DP389 | PTSUB | 132,367 | 31,695 | - | - |
| 519 | Common Utility Plant | | DPCP | PTSUB | 3,026,682 | 724,728 | - | - |
| 520 | Common Utility Plant Amortization | | DPCP | PTSUB | - | - | - | - |
| 521 | | | | | | | | |
| 522 | Total Depreciation Expense | | | | DEPREX \$ 16,854,710 | \$ 4,545,328 | \$ - | \$ - |
| 523 | | | | | | | | |
| 524 | | | | | | | | |
| 525 | Regulatory Credits and Accretion | | | | | | | |
| 526 | | | | | | | | |
| 527 | Regulatory Credits | | REGCR | PTSUB | - | - | - | - |
| 528 | | | | | | | | |
| 529 | Accretion | | ACCRE | PTSUB | - | - | - | - |
| 530 | | | | | | | | |
| 531 | Amortization of Investment Tax Credits | | ITCAM | PTSUB | (164) | (39) | - | - |
| 532 | | | | | | | | |
| 533 | | | | | | | | |

LOUISVILLE GAS AND ELECTRIC COMPANY

Cost of Service Study
12 Months Ended June 30, 2022

Functional Assignment and Classification

| | A | B | C | D | E | F | G | H | I | J | K | L | | |
|-----|--------------------------------------|--------|--------|---------------|--------------------|-----------------------|----------------|-------------------|---|-------------------------------------|---------|-------------|----|------------|
| 1 | | | | | | | | | | | | | | |
| 2 | Description | Name | Vector | Total Company | Procurement Demand | Procurement Commodity | Storage Demand | Storage Commodity | Transmission Non-Storage Related Demand | Transmission Storage Related Demand | | | | |
| 3 | | | | | | | | | | | | | | |
| 577 | Functional Assignment Vectors | | | | | | | | | | | | | |
| 578 | Gas Supply Demand | F001 | | 1.00000 | 1.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | | | |
| 579 | Gas Supply Commodity | F002 | | 1.00000 | 0.00000 | 1.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | | | |
| 580 | Storage Demand | F003 | | 1.00000 | 0.00000 | 0.00000 | 1.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | | | |
| 581 | Storage Commodity | F004 | | 1.00000 | 0.00000 | 0.00000 | 0.00000 | 1.00000 | 0.00000 | 0.00000 | 0.00000 | | | |
| 582 | Transmission Demand | F005 | | 1.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.835579 | 0.164421 | 0.00000 | | | |
| 583 | Distribution Expense Commodity | F007 | | 1.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | | | |
| 584 | Distribution Structures & Equipment | F008 | | 1.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | | | |
| 585 | Distribution Mains | F009 | | 1.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | | | |
| 586 | Services | F010 | | 1.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | | | |
| 587 | Meters | F011 | | 1.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | | | |
| 588 | Customer Accounts | F012 | | 1.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | | | |
| 589 | Customer Service Expense | F013 | | 1.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | | | |
| 590 | Transmission & Distribution Mains | TDMSUB | \$ | 715,138,225 | \$ | - | \$ | - | \$ | - | \$ | 186,703,851 | \$ | 36,738,637 |
| 591 | | | | | | | | | | | | | | |
| 592 | | | | | | | | | | | | | | |
| 593 | | | | | | | | | | | | | | |
| 594 | | | | | | | | | | | | | | |
| 595 | | | | | | | | | | | | | | |
| 596 | | | | | | | | | | | | | | |
| 597 | | | | | | | | | | | | | | |
| 598 | | | | | | | | | | | | | | |
| 599 | | | | | | | | | | | | | | |
| 600 | | | | | | | | | | | | | | |
| 601 | | | | | | | | | | | | | | |
| 602 | | | | | | | | | | | | | | |
| 603 | | | | | | | | | | | | | | |
| 604 | | | | | | | | | | | | | | |
| 605 | | | | | | | | | | | | | | |
| 606 | | | | | | | | | | | | | | |
| 607 | | | | | | | | | | | | | | |
| 608 | | | | | | | | | | | | | | |
| 609 | | | | | | | | | | | | | | |
| 610 | | | | | | | | | | | | | | |
| 611 | | | | | | | | | | | | | | |
| 612 | | | | | | | | | | | | | | |
| 613 | | | | | | | | | | | | | | |
| 614 | | | | | | | | | | | | | | |
| 615 | | | | | | | | | | | | | | |
| 616 | | | | | | | | | | | | | | |
| 617 | | | | | | | | | | | | | | |
| 618 | | | | | | | | | | | | | | |

LOUISVILLE GAS AND ELECTRIC COMPANY

Cost of Service Study
12 Months Ended June 30, 2022

Functional Assignment and Classification

| | A | B | C | D | M | N | O | P | Q | R |
|-----|---|------|---------|--------------|--------------------|----------------------------|------------------------------|----------------------|------------------------|----------------------|
| 1 | | | | | Distribution | Distribution Structures | Distribution Mains - | Distribution Mains - | Distribution Mains - | Distribution Mains - |
| 2 | Description | Name | Vector | Commodity | & Equipment Demand | Low & Med. Pressure Demand | Low & Med. Pressure Customer | High Pressure Demand | High Pressure Customer | |
| 3 | | | | | | | | | | |
| 619 | | | | | | | | | | |
| 620 | Internally Generated Functional Vectors | | | | | | | | | |
| 621 | | | | | | | | | | |
| 622 | Sub-Total Distribution Plant | | PTDSUB | - | 0.059593 | 0.129139 | 0.283490 | 0.022419 | 0.020230 | |
| 623 | Storage-Transmission-Distribution Subtotal | | PTSUB | - | 0.042868 | 0.092896 | 0.203928 | 0 | 0 | |
| 624 | Total Storage Plant | | PTST | - | - | - | - | - | - | |
| 625 | Transmission Plant | | PT365 | - | - | - | - | - | - | |
| 626 | General Plant | | PT389 | - | 0.042868 | 0.092896 | 0.203928 | 0 | 0 | |
| 627 | Total Distribution Plant | | PTDSUB | - | 0.059593 | 0.129139 | 0.283490 | 0 | 0 | |
| 628 | Sub-Total CWIP | | CWIP | - | 0.004501 | 0.111073 | 0.243829 | 0 | 0 | |
| 629 | Total Operation and Maintenance Expenses | | OMT | 0.018068 | 0.047500 | 0.074178 | 0.162837 | 0 | 0 | |
| 630 | Total Depreciation Reserve | | DEPR | - | 0.018257 | 0.146856 | 0.251182 | 0 | 0 | |
| 631 | Storage-Transmission -Distribution Plant Subtotal | | PTSUB | - | 0.042868 | 0.092896 | 0.203928 | 0 | 0 | |
| 632 | Total Labor Expenses | | LBTOT | 0.033197 | 0.066771 | 0.070373 | 0.154484 | 0 | 0 | |
| 633 | Transmission and Distribution Payroll | | LBTOT | 0.051958 | 0.104021 | 0.109091 | 0.239479 | 0 | 0 | |
| 634 | Transmission and Distribution Mains | | TDMSUB | - | - | 0.195024 | 0.428122 | 0 | 0 | |
| 635 | Storage Operation Expenses Labor Subtotal | | OSE | - | - | - | - | - | - | |
| 636 | Storage Maintenance Expenses Labor Subtotal | | MSE | - | - | - | - | - | - | |
| 637 | Mains & Services | | CADAL | - | - | 139,469,306 | 306,166,312 | 24,211,839 | 21,848,279 | |
| 638 | Demand/Commodity Percent of Purchased Gas Cost | | DMCM | - | - | - | - | - | - | |
| 639 | Distribution Operation Expenses Labor Subtotal | | DOES | 838,265 | 1,183,787 | 629,935 | 1,382,849 | 109,357 | 98,681 | |
| 640 | Distribution Maintenance Expenses Labor Subtotal | | DMES | - | 494,445 | 1,130,088 | 2,480,795 | 196,183 | 177,032 | |
| 641 | Subtotal Labor Expenses | | LBSUB | \$ 838,265 | \$ 1,678,232 | \$ 1,760,023 | \$ 3,863,645 | \$ 305,540 | \$ 275,713 | |
| 642 | Subtotal O&M Expenses | | OMSUB | \$ 1,075,433 | \$ 3,308,347 | \$ 6,019,987 | \$ 13,215,217 | \$ 1,045,068 | \$ 943,049 | |
| 643 | Depreciation Reserve - Distribution | | DEPRDIS | \$ - | \$ 4,247,160 | \$ 42,919,420 | \$ 71,843,810 | \$ 6,245,561 | \$ 4,501,029 | |

LOUISVILLE GAS AND ELECTRIC COMPANY

Cost of Service Study
12 Months Ended June 30, 2022

Functional Assignment and Classification

| | A | B | C | D | S | T | U | V |
|-----|---|------|---------|----------------------|--------------------|-------------------------------|---|------------------|
| 1 | | | | | | | | Customer Service |
| 2 | Description | Name | Vector | Services Customer | Meters Customer | Customer Accounts Customer | Customer Service Expense Customer | |
| 3 | | | | | | | | |
| 619 | | | | | | | | |
| 620 | Internally Generated Functional Vectors | | | | | | | |
| 621 | | | | | | | | |
| 622 | Sub-Total Distribution Plant | | PTDSUB | 0.391408 | 0.093721 | - | - | - |
| 623 | Storage-Transmission-Distribution Subtotal | | PTSUB | 0 | 0 | - | - | - |
| 624 | Total Storage Plant | | PTST | - | - | - | - | - |
| 625 | Transmission Plant | | PT365 | - | - | - | - | - |
| 626 | General Plant | | PT389 | 0 | 0 | - | - | - |
| 627 | Total Distribution Plant | | PTDSUB | 0 | 0 | - | - | - |
| 628 | Sub-Total CWIP | | CWIP | 0 | 0 | - | - | - |
| 629 | Total Operation and Maintenance Expenses | | OMT | 0 | 0 | 0 | 0 | 0 |
| 630 | Total Depreciation Reserve | | DEPR | 0 | 0 | - | - | - |
| 631 | Storage-Transmission -Distribution Plant Subtotal | | PTSUB | 0 | 0 | - | - | - |
| 632 | Total Labor Expenses | | LBTOT | 0 | 0 | 0 | 0 | 0 |
| 633 | Transmission and Distribution Payroll | | LBTOT | 0 | 0 | - | - | - |
| 634 | Transmission and Distribution Mains | | TDMSUB | - | - | - | - | - |
| 635 | Storage Operation Expenses Labor Subtotal | | OSE | - | - | - | - | - |
| 636 | Storage Maintenance Expenses Labor Subtotal | | MSE | - | - | - | - | - |
| 637 | Mains & Services | | CADAL | 422,716,510 | - | - | - | - |
| 638 | Demand/Commodity Percent of Purchased Gas Cost | | DMCM | | | | | |
| 639 | Distribution Operation Expenses Labor Subtotal | | DOES | 1,909,267 | 1,815,469 | - | - | - |
| 640 | Distribution Maintenance Expenses Labor Subtotal | | DMES | 571,622 | 196,655 | - | - | - |
| 641 | Subtotal Labor Expenses | | LBSUB | \$ 2,480,889 | \$ 2,012,124 | \$ 3,914,757 | \$ 240,990 | |
| 642 | Subtotal O&M Expenses | | OMSUB | \$ 8,775,696 | \$ 4,242,141 | \$ 10,881,813 | \$ 1,317,857 | |
| 643 | Depreciation Reserve - Distribution | | DEPRDIS | \$ 90,460,693 | \$ 18,813,509 | \$ - | \$ - | |

Exhibit WSS-37

Gas Cost of Service Study

Class Allocation

(Louisville Gas and Electric Company)

LOUISVILLE GAS AND ELECTRIC COMPANY

Cost of Service Study
12 Months Ended June 30, 2022

Class Allocation

| | A | B | C | D | E | F | G | H | I | J | K | |
|----|--|------|---------|----------------------|----|-----------------|----------------------|---------------------|---------------------|---------------------------------------|---|------------|
| | | | | | | | | | | | | |
| | | | | | | | | | | As Available Gas Service (AAGS) | Firm Transportation Service (FT) | |
| 3 | | | | Allocation Vector | | Total System | Residential (RGS) | Commercial (CGS) | Industrial (IGS) | | | |
| 4 | Description | Ref | Name | | | | | | | | | |
| 6 | Plant in Service | | | | | | | | | | | |
| 8 | Procurement Expenses | | | | | | | | | | | |
| 9 | Demand | PTIS | PTISGSD | DEM01 | \$ | - | \$ | - | \$ | - | \$ | |
| 10 | Commodity | PTIS | PTISGSC | COM01 | | - | | - | | - | | |
| 11 | Total Procurement Expenses | | | | \$ | - | \$ | - | \$ | - | \$ | |
| 13 | Storage | | | | | | | | | | | |
| 14 | Demand | PTIS | PTISSD | DEM02 | \$ | 225,613,142 | \$ | 149,205,366 | \$ | 69,309,707 | \$ | 5,746,398 |
| 15 | Commodity | PTIS | PTISSC | COM02 | | - | | - | | - | | |
| 16 | Total Storage | | | | \$ | 225,613,142 | \$ | 149,205,366 | \$ | 69,309,707 | \$ | 5,746,398 |
| 17 | | | | | | | | | | | | |
| 18 | Transmission | | | | | | | | | | | |
| 19 | Demand Non-Storage Related | PTIS | PTISTD | DEM04 | \$ | 201,711,581 | \$ | 107,174,739 | \$ | 52,152,153 | \$ | 4,032,119 |
| 20 | Storage Related | PTIS | PTISTC | DEM03 | | 39,691,782 | | 26,249,477 | | 12,193,553 | | 1,010,955 |
| 21 | Total Transmission | | | | \$ | 241,403,364 | \$ | 133,424,216 | \$ | 64,345,706 | \$ | 5,043,074 |
| 22 | | | | | | | | | | | | |
| 23 | Distribution Expenses | | | | | | | | | | | |
| 24 | Commodity | PTIS | PTISDEC | COM04 | \$ | - | \$ | - | \$ | - | \$ | |
| 25 | | | | | | | | | | | | |
| 26 | Distribution Structures & Equipment | | | | | | | | | | | |
| 27 | Demand | PTIS | PTISDSD | DEM04 | \$ | 69,533,228 | \$ | 36,944,857 | \$ | 17,977,686 | \$ | 1,389,936 |
| 28 | | | | | | | | | | | | |
| 29 | | | | | | | | | | | | |
| 30 | Distribution Mains | | | | | | | | | | | |
| 31 | Low/Medium Pressure - Demand | PTIS | PTISDMD | DEM05a | \$ | 150,680,204 | \$ | 95,647,560 | \$ | 46,416,572 | \$ | 3,446,836 |
| 32 | Low/Medium Pressure - Customer | PTIS | PTISDMC | CUSTPT01a | | 330,776,740 | | 304,568,961 | | 25,975,525 | | 197,455 |
| 33 | High Pressure - Demand | PTIS | PTISDMD | DEM05 | | 26,158,049 | | 13,898,468 | | 6,763,115 | | 522,887 |
| 34 | High Pressure - Customer | PTIS | PTISDMC | CUSTPT01 | | 23,604,500 | | 21,730,642 | | 1,853,396 | | 14,448 |
| 35 | Total Distribution Mains | | PTISDIS | | \$ | 531,219,492 | \$ | 435,845,632 | \$ | 81,008,607 | \$ | 4,181,626 |
| 36 | | | | | | | | | | | | |
| 37 | Services | | | | | | | | | | | |
| 38 | Customer | PTIS | PTISSC | CUST02 | \$ | 456,695,539 | \$ | 355,142,191 | \$ | 99,417,575 | \$ | 1,508,115 |
| 39 | | | | | | | | | | | | |
| 40 | Meters | | | | | | | | | | | |
| 41 | Customer | PTIS | PTISMC | CUST03 | \$ | 109,354,142 | \$ | 67,501,026 | \$ | 35,390,468 | \$ | 2,510,382 |
| 42 | | | | | | | | | | | | |
| 43 | Customer Accounts | | | | | | | | | | | |
| 44 | Customer | PTIS | PTISCAC | CUSTPT04 | \$ | - | \$ | - | \$ | - | \$ | |
| 45 | | | | | | | | | | | | |
| 46 | Customer Service | | | | | | | | | | | |
| 47 | Customer | PTIS | PTISCSC | CUSTPT05 | \$ | - | \$ | - | \$ | - | \$ | |
| 48 | | | | | | | | | | | | |
| 49 | Total | | PLT | | \$ | 1,633,818,906 | \$ | 1,178,063,287 | \$ | 367,449,750 | \$ | 20,379,532 |

LOUISVILLE GAS AND ELECTRIC COMPANY

Cost of Service Study
12 Months Ended June 30, 2022

Class Allocation

| | A | B | C | D | E | F | G | H | I | J | K |
|----|--|------|-------|-------------------|------------------|-------------------|------------------|------------------|---------------------------------|-----------------------------|------|
| 3 | | | | | | | | | | | Firm |
| 4 | Description | Ref | Name | Allocation Vector | Total System | Residential (RGS) | Commercial (CGS) | Industrial (IGS) | As Available Gas Service (AAGS) | Transportation Service (FT) | |
| 50 | | | | | | | | | | | |
| 51 | | | | | | | | | | | |
| 52 | | | | | | | | | | | |
| 53 | | | | | | | | | | | |
| 54 | Rate Base | | | | | | | | | | |
| 55 | | | | | | | | | | | |
| 56 | Procurement Expenses | | | | | | | | | | |
| 57 | Demand | NCRB | RBGSD | DEM01 | \$ 55,522 | \$ 36,178 | \$ 17,604 | \$ 1,361 | \$ 379 | \$ - | |
| 58 | Commodity | NCRB | RBGSC | COM01 | 417,406 | 258,785 | 138,148 | 18,487 | 1,986 | - | |
| 59 | Total Procurement Expenses | | | | \$ 472,928 | \$ 294,962 | \$ 155,753 | \$ 19,849 | \$ 2,364 | \$ - | |
| 60 | | | | | | | | | | | |
| 61 | Storage | | | | | | | | | | |
| 62 | Demand | NCRB | RBSD | DEM02 | \$ 175,204,909 | \$ 115,868,749 | \$ 53,823,996 | \$ 4,462,494 | \$ - | \$ 1,049,669 | |
| 63 | Commodity | NCRB | RBSC | COM02 | 2,672,923 | 1,711,821 | 881,288 | 79,814 | - | - | |
| 64 | Total Storage | | | | \$ 177,877,832 | \$ 117,580,570 | \$ 54,705,284 | \$ 4,542,308 | \$ - | \$ 1,049,669 | |
| 65 | | | | | | | | | | | |
| 66 | Transmission | | | | | | | | | | |
| 67 | Demand Non-Storage Related | NCRB | RBTD | DEM04 | \$ 177,537,247 | \$ 94,330,271 | \$ 45,901,924 | \$ 3,548,885 | \$ 986,979 | \$ 32,769,188 | |
| 68 | Storage Related | NCRB | RBTC | DEM03 | 34,934,880 | 23,103,581 | 10,732,204 | 889,796 | - | 209,298 | |
| 69 | Total Transmission | | | | \$ 212,472,126 | \$ 117,433,852 | \$ 56,634,128 | \$ 4,438,682 | \$ 986,979 | \$ 32,978,486 | |
| 70 | | | | | | | | | | | |
| 71 | Distribution Expenses | | | | | | | | | | |
| 72 | Commodity | NCRB | RBDEC | COM04 | \$ 532,971 | \$ 239,695 | \$ 127,958 | \$ 17,124 | \$ 1,839 | \$ 146,355 | |
| 73 | | | | | | | | | | | |
| 74 | Distribution Structures & Equipment | | | | | | | | | | |
| 75 | Demand | NCRB | RBDS | DEM04 | \$ 53,226,490 | \$ 28,280,653 | \$ 13,761,610 | \$ 1,063,972 | \$ 295,901 | \$ 9,824,355 | |
| 76 | | | | | | | | | | | |
| 77 | | | | | | | | | | | |
| 78 | Distribution Mains | | | | | | | | | | |
| 79 | Low/Medium Pressure - Demand | NCRB | RBDMD | DEM05a | \$ 70,558,775 | \$ 44,788,728 | \$ 21,735,413 | \$ 1,614,045 | \$ 455,731 | \$ 1,964,859 | |
| 80 | Low/Medium Pressure - Customer | NCRB | RBDMC | CUSTPT01a | 186,854,890 | 172,050,186 | 14,673,504 | 111,542 | 1,141 | 18,517 | |
| 81 | High Pressure - Demand | NCRB | RBDMD | DEM05 | 13,970,753 | 7,423,033 | 3,612,112 | 279,269 | 77,667 | 2,578,671 | |
| 82 | High Pressure - Customer | NCRB | RBDMC | CUSTPT01 | 14,228,121 | 13,098,613 | 1,117,174 | 8,709 | 130 | 3,494 | |
| 83 | Total Distribution Mains | | | | \$ 285,612,538 | \$ 237,360,560 | \$ 41,138,203 | \$ 2,013,564 | \$ 534,670 | \$ 4,565,541 | |
| 84 | | | | | | | | | | | |
| 85 | Services | | | | | | | | | | |
| 86 | Customer | NCRB | RBSC | CUST02 | \$ 251,702,188 | \$ 195,732,297 | \$ 54,792,786 | \$ 831,179 | \$ 12,434 | \$ 333,492 | |
| 87 | | | | | | | | | | | |
| 88 | Meters | | | | | | | | | | |
| 89 | Customer | NCRB | RBMC | CUST03 | \$ 65,932,949 | \$ 40,698,428 | \$ 21,337,993 | \$ 1,513,586 | \$ 107,786 | \$ 2,275,156 | |
| 90 | | | | | | | | | | | |
| 91 | Customer Accounts | | | | | | | | | | |
| 92 | Customer | NCRB | RBCAC | CUSTPT04 | \$ 4,090,962 | \$ 3,482,866 | \$ 594,104 | \$ 4,631 | \$ 69 | \$ 9,291 | |
| 93 | | | | | | | | | | | |
| 94 | Customer Service | | | | | | | | | | |
| 95 | Customer | NCRB | RBCSC | CUSTPT05 | \$ 428,992 | \$ 365,225 | \$ 62,300 | \$ 486 | \$ 7 | \$ 974 | |
| 96 | | | | | | | | | | | |
| 97 | Total | | RBT | | \$ 1,052,349,977 | \$ 741,469,107 | \$ 243,310,119 | \$ 14,445,380 | \$ 1,942,049 | \$ 51,183,321 | |

LOUISVILLE GAS AND ELECTRIC COMPANY

Cost of Service Study
12 Months Ended June 30, 2022

Class Allocation

| | A | B | C | D | E | F | G | H | I | J | K |
|-----|--|-------|-------|-------------------|--------------|-------------------|------------------|------------------|---------------------------------|-----------------------------|------|
| 3 | | | | | | | | | | | Firm |
| 4 | Description | Ref | Name | Allocation Vector | Total System | Residential (RGS) | Commercial (CGS) | Industrial (IGS) | As Available Gas Service (AAGS) | Transportation Service (FT) | |
| 282 | Accretion Expense | | | | | | | | | | |
| 283 | Procurement Expenses | | | | | | | | | | |
| 284 | | | | | | | | | | | |
| 285 | Demand | ACCRE | DEGSD | DEM01 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| 286 | Commodity | ACCRE | DEGSC | COM01 | - | - | - | - | - | - | - |
| 287 | Total Procurement Expenses | | DEGST | | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| 288 | | | | | | | | | | | |
| 289 | Storage | | | | | | | | | | |
| 290 | Demand | ACCRE | DESD | DEM02 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| 291 | Commodity | ACCRE | DESC | COM02 | - | - | - | - | - | - | - |
| 292 | Total Storage | | DEST | | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| 293 | | | | | | | | | | | |
| 294 | Transmission | | | | | | | | | | |
| 295 | Demand Non-Storage Related | ACCRE | DETD | DEM04 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| 296 | Storage Related | ACCRE | DETC | DEM03 | - | - | - | - | - | - | - |
| 297 | Total Transmission | | DETT | | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| 298 | | | | | | | | | | | |
| 299 | Distribution Expenses | | | | | | | | | | |
| 300 | Commodity | ACCRE | DEDEC | COM04 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| 301 | | | | | | | | | | | |
| 302 | Distribution Structures & Equipment | | | | | | | | | | |
| 303 | Demand | ACCRE | DESD | DEM04 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| 304 | | | | | | | | | | | |
| 305 | Distribution Mains | | | | | | | | | | |
| 306 | Low/Medium Pressure - Demand | ACCRE | DEDMD | DEM05a | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| 307 | Low/Medium Pressure - Customer | ACCRE | DEDMC | CUSTOM01a | - | - | - | - | - | - | - |
| 308 | High Pressure - Demand | ACCRE | DEDMD | DEM05 | - | - | - | - | - | - | - |
| 309 | High Pressure - Customer | ACCRE | DEDMC | CUSTOM01 | - | - | - | - | - | - | - |
| 310 | Total Distribution Mains | | | | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| 311 | | | | | | | | | | | |
| 312 | Services | | | | | | | | | | |
| 313 | Customer | ACCRE | DESC | CUST02 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| 314 | | | | | | | | | | | |
| 315 | Meters | | | | | | | | | | |
| 316 | Customer | ACCRE | DEMC | CUST03 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| 317 | | | | | | | | | | | |
| 318 | Customer Accounts | | | | | | | | | | |
| 319 | Customer | ACCRE | DECAC | CUSTOM04 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| 320 | | | | | | | | | | | |
| 321 | Customer Service | | | | | | | | | | |
| 322 | Customer | ACCRE | DECSC | CUSTOM05 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| 323 | | | | | | | | | | | |
| 324 | Total | | ACC | | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| 325 | | | | | | | | | | | |

LOUISVILLE GAS AND ELECTRIC COMPANY

Cost of Service Study
12 Months Ended June 30, 2022

Class Allocation

| | A | B | C | D | E | F | G | H | I | J | K |
|-----|-------------------------------------|-----|---------|----------------------|-----------------|----------------------|---------------------|---------------------|----|---------------------------------------|---|
| 3 | | | | | | | | | | As Available Gas Service (AAGS) | Firm Transportation Service (FT) |
| 4 | Description | Ref | Name | Allocation Vector | Total System | Residential (RGS) | Commercial (CGS) | Industrial (IGS) | | | |
| 620 | Allocation Factors Continued | | | | | | | | | | |
| 621 | Allocation Factors Continued | | | | | | | | | | |
| 622 | Allocation Factors Continued | | | | | | | | | | |
| 623 | Taxable Income | | | | | | | | | | |
| 624 | Taxable Income | | | | | | | | | | |
| 625 | Net Income Before Income Tax | | NIBIT | | \$ 62,876,825 | \$ 39,743,616 | \$ 22,100,807 | \$ 2,428,129 | \$ | (87,002) | \$ (1,308,726) |
| 626 | Taxable Income | | | | | | | | | | |
| 627 | Interest Expense | | INT | | \$ 17,694,326 | \$ 12,735,466 | \$ 3,980,048 | \$ 222,586 | \$ | 31,284 | \$ 724,942 |
| 628 | Interest Adjustment | | | | \$ - | \$ - | \$ - | \$ - | \$ | - | \$ - |
| 629 | Taxable Income | | | | | | | | | | |
| 630 | Taxable Income | | TXINC | | \$ 45,182,499 | \$ 27,008,150 | \$ 18,120,759 | \$ 2,205,543 | \$ | (118,286) | \$ (2,033,667) |
| 631 | Taxable Income | | | | | | | | | | |
| 632 | Total Distribution Expense | | DISTR | | \$ 53,537,067 | \$ 39,904,420 | \$ 10,751,427 | \$ 574,646 | \$ | 105,875 | \$ 2,200,698 |
| 633 | Taxable Income | | | | | | | | | | |
| 634 | Number of Customers | | | | 327,622 | 301,613 | 25,724 | 201 | | 3 | 80 |
| 635 | Services Cost | | | | | | | | | | |
| 636 | Services Cost | | | | 391,144,507 | 304,167,449 | 85,147,839 | 1,291,650 | | 19,323 | 518,246 |
| 637 | | | | | \$ 1,008.47 | \$ 1,008.47 | \$ 3,310.00 | \$ 6,440.91 | \$ | 6,440.91 | \$ 6,440.91 |
| 638 | Services Cost | | | | | | | | | | |
| 639 | Actual Revenue | | REV01 | | 354,943,652 | 238,109,178 | 101,307,441 | 8,488,908 | | 419,670 | 6,618,455 |
| 640 | DSM Allocation | | REVDJ4 | | 369,541 | 235,706 | 133,397 | - | | 437 | - |
| 641 | Forfeited Discounts | | REVD4 | | 1,079,328 | 872,230 | 193,953 | 13,008 | | - | 137 |
| 642 | Miscellaneous Revenue Allocation | | REVMISC | | 108,583 | 77,057 | 29,667 | 196 | | - | 1,663 |
| 643 | GSC Revenue | | REVGSC | | 115,476,300 | 73,041,197 | 38,749,209 | 3,507,061 | | 178,833 | - |
| 644 | Removal of GLT Revenue | | REVGLT | | 10,181,350 | 6,886,665 | 2,860,959 | 333,499 | | 18,776 | 81,451 |
| 645 | Pro-Forma Adjustments | | PROFO | | (126,980,903) | (80,803,354) | (42,015,773) | (3,863,369) | | (199,173) | (99,234) |
| 646 | Services Cost | | | | | | | | | | |
| 647 | High Pressure System | | RBTHP | | 28,198,874 | 20,521,646 | 4,729,286 | 287,978 | | 77,798 | 2,582,166 |

Exhibit WSS-38

Gas Cost of Service Study

Storage Allocation

(Louisville Gas and Electric Company)

Calculation of Maximum Class Demands On February 26th Design Day (4 Degrees) for Determination of Demand Allocation Factors

| | Total | Residential Rate RGS | Commercial Rate CGS | Industrial Rate IGS | Rate FT 5 Percent Balancing |
|--|--------------|-------------------------------------|------------------------------------|------------------------------------|--|
| Calculated Daily Requirements at 4 Degrees (61 HDDs) | 416,029 | 276,944 | 129,292 | 9,793 | 0 |
| Percentage of Total | | 66.57% | 31.08% | 2.35% | 0.00% |

Allocation of Underground Storage

| | Storage Withdrawals | Residential Rate RGS | Commercial Rate CGS | Industrial Rate IGS | Rate FT 5 Percent Balancing |
|---|--------------------------------|-------------------------------------|------------------------------------|------------------------------------|--|
| Total Allocated Withdrawals Thru February 28th | 8,316,075 | 5,485,002 | 2,542,658 | 218,439 | 69,976 |
| Balance of Working Gas Allocated on the Basis of 4 Degrees (Feb. 26th) | 3,363,925 | 2,239,365 | 1,045,508 | 79,052 | 0 |
| Total Working Gas Cycled | 11,680,000 | 7,724,367 | 3,588,166 | 297,491 | 69,976 |
| Total Allocation Factor For Underground Storage | 1.000000 | 0.661333 | 0.307206 | 0.025470 | 0.005991 |

Exhibit WSS-39

Summary Results of
Lead-Lag Study

Kentucky Utilities Company

Cash Working Capital Analysis

2020 Kentucky Rate Case

Revenue Lag Days Based on the Year Ended December 31, 2019

Expense Lead Days Based on the Year Ended December 31, 2017

| Lead/Lag Days Summary | |
|--|------------------|
| | Lag Days |
| Revenue | |
| Meter Reading..... | 15.21 |
| Billing..... | 4.20 |
| Collection..... | 25.09 |
| Bank..... | 1.00 |
| Total..... | 45.50 |
| | Lead Days |
| O&M Expense | |
| Fuel: Coal..... | 27.28 |
| Fuel: Gas..... | 39.32 |
| Fuel: Oil..... | 17.32 |
| Other Non-Fuel Commodities..... | 27.76 |
| Purchased Power..... | 23.66 |
| Payroll Expense..... | 13.01 |
| Pension Expense..... | - |
| OPEB Expense..... | - |
| Team Incentive Award Compensation..... | 244.79 |
| 401k Match Expense..... | 22.56 |
| Retirement Income Account Expense..... | 283.50 |
| Uncollectible Expense..... | 131.70 |
| Major Storm Damage Expense..... | 41.74 |
| Charges from Affiliates..... | 25.39 |
| Other O&M..... | 48.05 |
| Depreciation and Amortization Expense | |
| Depreciation and Amortization..... | - |
| Regulatory Debits..... | - |
| Amortization of Regulatory Assets..... | - |
| Amortization of Regulatory Liabilities..... | - |
| Income Tax Expense | |
| Current: Federal..... | 37.50 |
| Current: State..... | 37.50 |
| Deferred: Federal and State (Including ITC)..... | - |
| Taxes Other Than Income | |
| Property Tax Expense..... | 157.57 |
| Payroll Tax Expense..... | 35.64 |
| Other Taxes..... | (152.00) |
| Interest Expense..... | 88.65 |
| Sales Tax..... | 39.80 |
| School Tax..... | 34.95 |
| Franchise Fees..... | 67.16 |

Louisville Gas and Electric Company

Cash Working Capital Analysis

2020 Kentucky Rate Case

Revenue Lag Days Based on the Year Ended December 31, 2019

Expense Lead Days Based on the Year Ended December 31, 2017

| Lead/Lag Days Summary | | |
|---|-----------------|---------------|
| | Lag Days | |
| | Electric | Gas |
| Revenue | | |
| Meter Reading..... | 15.21 | 15.21 |
| Billing..... | 4.29 | 4.28 |
| Collection..... | 23.77 | 23.77 |
| Bank..... | 1.00 | 1.00 |
| Total..... | 44.27 | 44.26 |
| Lead Days | | |
| | Electric | Gas |
| O&M Expense | | |
| Fuel: Coal..... | 24.36 | n/a |
| Fuel: Gas..... | 38.99 | n/a |
| Fuel: Oil..... | 8.40 | n/a |
| Other Non-Fuel Commodities..... | 26.87 | n/a |
| Purchased Gas..... | n/a | 39.66 |
| No-Notice Storage Injections and Withdrawals..... | n/a | - |
| Purchased Power..... | 28.37 | n/a |
| Payroll Expense..... | 12.00 | 12.00 |
| Pension Expense..... | - | - |
| OPEB Expense..... | - | - |
| Team Incentive Award Compensation..... | 245.22 | 245.22 |
| 401k Match Expense..... | 22.99 | 22.99 |
| Retirement Income Account Expense..... | 283.50 | 283.50 |
| Uncollectible Expense..... | 174.20 | 256.34 |
| Major Storm Damage Expense..... | 35.32 | 35.32 |
| Charges from Affiliates..... | 25.40 | 25.40 |
| Other O&M..... | 49.19 | 49.19 |
| Depreciation and Amortization Expense | | |
| Depreciation and Amortization..... | - | - |
| Regulatory Debits..... | - | - |
| Amortization of Regulatory Assets..... | - | - |
| Amortization of Regulatory Liabilities..... | - | - |
| Income Tax Expense | | |
| Current: Federal..... | 37.50 | 37.50 |
| Current: State..... | 37.50 | 37.50 |
| Deferred: Federal and State (Including ITC)..... | - | - |
| Taxes Other Than Income | | |
| Property Tax Expense..... | 216.26 | 216.26 |
| Payroll Tax Expense..... | 35.48 | 35.48 |
| Other Taxes..... | (148.70) | (148.70) |
| Interest Expense..... | 87.50 | 87.50 |
| Sales Taxes..... | 39.83 | 39.83 |
| School Taxes..... | 35.05 | 35.05 |
| Franchise Fees..... | 100.24 | 100.24 |