

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC JOINT APPLICATION OF)	
KENTUCKY UTILITIES COMPANY AND)	
LOUISVILLE GAS AND ELECTRIC)	
COMPANY FOR CERTIFICATES OF)	
PUBLIC CONVENIENCE AND NECESSITY)	CASE NO. 2022-00402
AND APPROVAL OF A DEMAND SIDE)	
MANAGEMENT PLAN AND APPROVAL OF)	
FOSSIL FUEL-FIRED GENERATING UNIT)	
RETIREMENTS)	

RESPONSE OF
KENTUCKY UTILITIES COMPANY
AND
LOUISVILLE GAS AND ELECTRIC COMPANY
TO
THE KENTUCKY COAL ASSOCIATION'S
POST-HEARING REQUEST FOR INFORMATION
DATED SEPTEMBER 1, 2023

FILED: SEPTEMBER 15, 2023

VERIFICATION


COMMONWEALTH OF KENTUCKY)
)
COUNTY OF JEFFERSON)

The undersigned, **Lonnie E. Bellar**, being duly sworn, deposes and says that he is Chief Operating Officer for Louisville Gas and Electric Company and Kentucky Utilities Company and an employee of LG&E and KU Services Company, 220 West Main Street, Louisville, KY 40202, and that he has personal knowledge of the matters set forth in the responses for which he is identified as the witness, and the answers contained therein are true and correct to the best of his information, knowledge and belief.



Lonnie E. Bellar

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 14th day of September 2023.



Notary Public
Notary Public ID No. KYNP63286

My Commission Expires:
January 22, 2027



VERIFICATION

COMMONWEALTH OF KENTUCKY)
)
COUNTY OF JEFFERSON)

The undersigned, **Philip A. Imber**, being duly sworn, deposes and says that he is Director – Environmental and Federal Regulatory Compliance for LG&E and KU Services Company, 220 West Main Street, Louisville, KY 40202, and that he has personal knowledge of the matters set forth in the responses for which he is identified as the witness, and the answers contained therein are true and correct to the best of his information, knowledge, and belief.

Philip A. Imber

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 14 day of September 2023.

Notary Public

Notary Public ID No. KYNP63286

My Commission Expires:


January 22, 2027



VERIFICATION

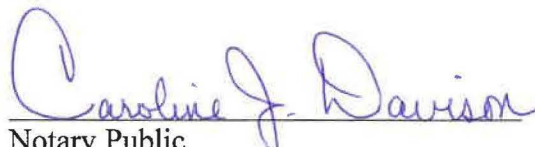
COMMONWEALTH OF KENTUCKY)
)
COUNTY OF JEFFERSON)

The undersigned, **Stuart A. Wilson**, being duly sworn, deposes and says that he is Director, Energy Planning, Analysis & Forecasting for LG&E and KU Services Company, 220 West Main Street, Louisville, KY 40202, and that he has personal knowledge of the matters set forth in the responses for which he is identified as the witness, and the answers contained therein are true and correct to the best of his information, knowledge, and belief.



Stuart A. Wilson

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 14th day of September 2023.

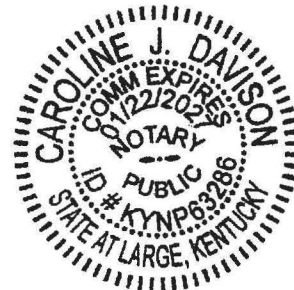


Notary Public

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**KENTUCKY UTILITIES COMPANY
AND
LOUISVILLE GAS AND ELECTRIC COMPANY**

**Response to Kentucky Coal Association's
Post-Hearing Request for Information
Dated September 1, 2023**

Case No. 2022-00402

Question No. 5.1

Responding Witness: Stuart A. Wilson

- Q.5.1. This pertains to KCA questioning of Mr. Wilson, please provide all work papers, assumptions, formulas related to the NPV/PVRR analysis performed by the Companies. Please identify the methodology to develop the costs and assumptions.
- A.5.1. Regarding workpapers and formulas associated with the PVRR analysis in the 2022 Resource Assessment (Exhibit SAW-1) see the response to PSC 1-48(d). Regarding workpapers and formulas associated with the PVRR analysis in the 2023 Fossil Fuel-Fired Electric Generating Unit Retirement Assessment (Exhibit SB4-1), see “\FinancialModel\CONFIDENTIAL_20230505_FinancialModel_0314_D01” in Exhibit SB4-2. Also see the attached file, which is the workpaper for the September 8, 2023 Second Supplemental Errata Filing. The information requested is confidential and proprietary and is being provided under seal pursuant to a petition for confidential treatment. Regarding assumptions and methodology, see the Exhibits SAW-1, SAW-2, SB4-1, and SB4-2.

**KENTUCKY UTILITIES COMPANY
AND
LOUISVILLE GAS AND ELECTRIC COMPANY**

**Response to Kentucky Coal Association's
Post-Hearing Request for Information
Dated September 1, 2023**

Case No. 2022-00402

Question No. 5.2

Responding Witness: Lonnie E. Bellar / Philip A. Imber

- Q.5.2. This pertains to KCA questioning of Mr. Sinclair, please address whether inclusion of life extension costs (see, e.g., Table 11 “Total Stay Open Costs” related to the coal units and SB4 retirement assessments) triggers New Source Review by the EPA (similar to EW Brown 3 and the consent decree).
- A.5.2. The maintenance activities related to the stay open costs presented in Table 11, including turbine overhauls, can be performed as routine maintenance, repair, and replacement (“RMRR”) or replacement in kind and are not expected to cause emissions increases that would trigger New Source Review and Potential for Significant Deterioration permitting. The stay open costs do include new construction projects which are needed to keep the units in operation (e.g., Mill Creek Unit 1 requires an SCR to operate under the Good Neighbor Plan and a cooling tower to comply with Clean Water Act 316(b)). All new construction projects will need to undergo New Source Review to determine their emissions impacts and the correct path for obtaining construction and operating permits.