## **COMMONWEALTH OF KENTUCKY**

## **BEFORE THE PUBLIC SERVICE COMMISSION**

In the Matter of:

# AN ELECTRONIC EXAMINATION OF THE)APPLICATION OF THE FUEL ADJUSTMENT)CLAUSE OF KENTUCKY UTILITIES)COMPANY FROM NOVEMBER 1, 2020)THROUGH OCTOBER 31, 2022)

CASE NO. 2023-00010

## RESPONSE OF KENTUCKY UTILITIES COMPANY TO THE COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION DATED OCTOBER 5, 2023

**FILED: OCTOBER 20, 2023** 

#### VERIFICATION

## COMMONWEALTH OF KENTUCKY ) ) COUNTY OF JEFFERSON )

The undersigned, **Andrea M. Fackler**, being duly sworn, deposes and says that she is Manager - Revenue Requirement/Cost of Service for LG&E and KU Services Company, 220 West Main Street, Louisville, KY 40202, and that she has personal knowledge of the matters set forth in the responses for which she is identified as the witness, and the answers contained therein are true and correct to the best of her information, knowledge, and belief.

Indien M. Jackeler

Andrea M. Fackler

Subscribed and sworn to before me, a Notary Public in and before said County and State, this  $12^{\text{H}}$  day of <u>Ctober</u> 2023.

Notary Public

Notary Public ID No. KYNP63286

My Commission Expires:

Jamary 22, 2027



## KENTUCKY UTILITIES COMPANY

## Response to Commission Staff's Second Request for Information Dated October 5, 2023

## Case No. 2023-00011

## **Question No. 1**

#### **Responding Witness: Andrea M. Fackler**

- Q-1. For the two-year period under review, provide each instance an error or misreport was made by KU on its FAC form A rate sheet filing. For each instance provide:
  - a. An explanation on the error that occurred and why the error was made.
  - b. KU's actions taken to correct for the error and to ensure future similar errors do not occur.
  - c. Revised FAC form A rate sheets showing the actual fuel related expense and sales as correctly calculated pursuant to 807 KAR 5:056.
- A-1. For the two-year period under review, the Company corrected the following FAC Form A expense month filings and disclosed the corrections in the cover letter of a subsequent FAC filing that included the applicable revised FAC Form A pages.

#### February 2021 Expense Month

a. A miskeyed auxiliary usage meter reading at Trimble County Unit 2 for the month of February 2021 caused Unit 2's net generation to be understated, which impacted allocations of generation to all owners of the unit (KU, LG&E, IMEA, and IMPA)<sup>1</sup> for accounting purposes. The Company became aware of the issue before the February 2021 Expense Month filing was made on March 19, 2021. Corrections to all of the applicable inputs were incorporated into the Form A filing with the exception of the exclusion amounts for the IMEA and IMPA portions of Unit 2's fuel cost and the 0.5% transmission losses reflected in Note (1) on Page 2 of 6. This information came from Accounting and could not be updated in time for the filing. The exclusion amounts did not impact the recoverable fuel costs or resulting FAC factor; therefore, the Company later corrected the information by filing a revised Form A Page 2 of 6 with the Commission on April 20, 2021 as an accompaniment to the Company's March 2021 Expense Month FAC Form A filing.

<sup>&</sup>lt;sup>1</sup> Trimble County Unit 2 ownership percentages are as follows: KU (Kentucky Utilities Company) – 60.75%, LG&E (Louisville Gas and Electric Company) – 14.25%; IMEA (Illinois Municipal Electric Agency) – 12.88%; and IMPA (Indiana Municipal Power Agency) – 12.12%.

- b. To mitigate this potential issue in the future, plant personnel responsible for the meter readings implemented an additional level of review to verify the accuracy of the data before it is approved in EGOR.<sup>2</sup>
- c. See the attached revised February 2021 Expense Month Form A filing (Attachment 1) incorporating all corrected information. As discussed in part a, there was no impact on recoverable fuel costs or sales due to this issue.

## March 2021 Expense Month

- a. The March 2021 Expense Month Form A filing issue stemmed from the February 2021 Trimble County Unit 2 auxiliary usage meter reading issue. The February 2021 Expense Month Form A filing excluded the appropriate non-jurisdictional fuel costs, but the accounting books did not reflect the difference in the originally calculated non-jurisdictional fuel costs for February 2021 until March 2021. The accounting adjustment was removed from the March 2021 data when determining the fuel costs for the March 2021 Expense Month Form A filing made on April 20, 2021. However, it was later determined that the adjustment was not removed properly. As a result, actual fuel costs were overstated in the March 2021 Expense Month Form A filing and were later corrected by filing the revised Form A Pages 1 and 2 of 6 with the Commission on May 14, 2021 as an accompaniment to the Company's March 2021 Expense Month FAC Form B filing.
- b. To mitigate this potential issue in the future, interdepartmental discussions are used to ensure prior period adjustments are accounted for appropriately in all applicable expense month filings, and documentation of book vs. ratemaking differences are notated during filing review processes. Additionally, if there is a known issue in the underlying data to be used in an FAC filing that cannot be fully resolved by the due date for the filing, the Company will use the best available information at the time rather than only correcting part of the issue to allow itself more time to properly research, analyze, and resolve the issue in full.
- c. See the attached revised March 2021 Expense Month Form A filing (Attachment 2) incorporating all corrected information. Because this issue impacted the amount of recoverable fuel costs and changed the resulting FAC billing factor for March 2021, the Company included the revised FAC billing factor in Line 7 of Page 5 of 6 of its May 2021 Expense Month Form A filing in order to true-up March 2021's refunded FAC revenues to revenues that should have been refunded based on the corrected FAC billing factor.

## August 2021 Expense Month

<sup>&</sup>lt;sup>2</sup> EGOR - Enhanced GADS (Generation Availability Data System) Operating Report. The application is used to store and display generation data statistics such as operating hours, station operating reports, GADS events, etc.

- a. The August 2021 Expense Month Form A filing was made on September 17, 2021 but a correction to Page 2 of 6 was filed on September 21, 2021 due to an update received from Company personnel after the original filing. The update corrected the start date for a Ghent Unit 1 forced outage to be August 28, 2021 instead of August 29, 2021, which impacted the forced outage exclusion calculation. However, the update did not change the fact that the Company did not experience any exclusions of fuel cost recovery pursuant to 807 KAR 5:056 due to forced outages during the month of August 2021. Because the correction was identified within the 10 day period prior to the effective date of the resulting FAC factor pursuant to 807 KAR 5:056, Section 2(2), on September 21, 2021 the Company filed a separate cover letter explaining the need for filing of a revised Page 2 of 6 of the August 2021 Expense Month Form A filing.
- b. To mitigate this potential issue in the future, Company personnel responsible for the forced outage report added an additional verification step to review the accuracy of the data before distributing the report. Also, as mentioned previously, if there is a known issue in an FAC filing that cannot be fully resolved by the due date for the filing, the Company will use the best available information at the time to allow itself more time to properly research, analyze, and resolve the issue.
- c. See the attached revised August 2021 Expense Month Form A filing (Attachment 3) incorporating all corrected information. As discussed, there was no impact on recoverable fuel costs or sales due to this issue.

Attachment 1 to Response to Question No. 1 Page 1 of 11 Fackler



Ms. Linda Bridwell Executive Director Kentucky Public Service Commission 211 Sower Boulevard Frankfort, KY 40601-8294

March 19, 2021

#### Kentucky Utilities Company

State Regulation and Rates 220 West Main Street PO Box 32010 Louisville, Kentucky 40232 www.lge-ku.com

Andrea M. Fackler Manager, Revenue Requirement/Cost of Service T 502-627-3442 F 502-627-3213 andrea.fackler@lge-ku.com

Dear Ms. Bridwell:

In compliance with 807 KAR 5:056 and subject to the terms of the Commission's March 16, 2020 and March 24, 2020 Orders in Case No. 2020-00085 (Electronic Emergency Docket Related to the Novel Coronavirus COVID-19 ("COVID-19 Orders"), Kentucky Utilities Company herewith files its adjustment clause factor including the monthly fuel adjustment factor and off-system sales adjustment factor applicable to billings under retail rates during the April 2021 billing cycle which begins March 31, 2021. The original filing in paper medium will be delivered to the Commission consistent with the COVID-19 Orders.

The necessary supporting data to justify the billing factors is included. Please contact me if you have any questions about this filing.

Sincerely,

Andrea M. Sadeler

Andrea M. Fackler

Enclosures

## **KENTUCKY UTILITIES COMPANY**

## SUMMARY OF ADJUSTMENT CLAUSES

Expense Month: February 2021

- 1. Fuel Adjustment Clause Factor (Page 1 of 6) (+) \$
- 2. Off-System Sales Adjustment Clause Factor (OSS Page 1 of 3)
- 3. Total Adjustment Clause Billing Factor (Line 1 - Line 2)

Note: (1) Five decimal places in dollars for normal rounding.

Effective Date for Billing: March 31, 2021

Submitted by Andrea M. Fadeler

Title: Manager, Revenue Requirement/Cost of Service

- (0.00102) / KWH (-) \$ 0.00029 / KWH
  - = \$ (0.00131) / KWH

Attachment 1 to Response to Question No. 1 Page 3 of 11 Fackler

> Form A Page 1 of 6

## **KENTUCKY UTILITIES COMPANY**

# FUEL ADJUSTMENT CLAUSE SCHEDULE

Expense Month: February 2021

Fuel "Fm" (Fuel Cost Schedule)	\$ 40,986,015	= (+) \$	0.02350 / KWH
Sales "Sm" (Sales Schedule)	 1,744,371,754 КWH	-(+) φ	0.02330 / RWIT
Per First Revision of PSC approved February 1,		= (-) _\$_	<u>0.02452</u> / KWH
	FAC Factor (1)	= _\$	<u>(0.00102)</u> / KWH

Note: (1) Five decimal places in dollars for normal rounding.

Effective Date for Billing: March 31, 2021

Page 2 of 6

# KENTUCKY UTILITIES COMPANY FUEL COST SCHEDULE

Expense Month: February 2021

(A) Company Generation				
Coal Burned	(+)		\$30,591,827	(1)
Oil Burned	(+)		32,268	(1)
Gas Burned	(+)		10,206,577	(1)
Fuel (assigned cost during Forced Outage)	(+)		-	
Fuel (substitute cost for Forced Outage)	(-)		-	
SUB-TOTAL	_	\$	40,830,672	
(B) Purchases				
Net energy cost - economy purchases	(+)	\$	549,391	
Identifiable fuel cost - other purchases	(+)	Ψ	-	
Identifiable fuel cost (substitute for Forced Outage)	(-)		_	
Less Purchases above Highest Cost Units	(-)		2,532	
Internal Economy	(+)		2,476,552	
Internal Replacement	(+)		45,931	
SUB-TOTAL	` '-	\$	3,069,342	
(C) Inter-System Sales	-		, ,	
Including Interchange-out	(+)	\$	610,642	
Internal Economy	(+)	Ŧ	595,333	
Internal Replacement	(+)		1,070,338	
Dollars Assigned to Inter-System Sales Losses	(+)		3,053	
SUB-TOTĂL	` / -	\$	2,279,366	
	-		· · ·	
(D) Over or (Under) Recovery				
From Page 5, Line 13	_	\$	(125,922)	
(E) CSR Customers Buy-Through Adjustment	-	\$	760,555	
TOTAL FUEL RECOVERY (A+B-C-D-E) =	=	\$	40,986,015	1

Note: (1) Reflects exclusion of IMEA/IMPA portion of Trimble County Unit 2 fuel cost with recognition of 0.5% transmission losses per Commission's Order in Case No. 2012-00552.

Coal burned =	\$8,368
Gas burned =	\$160

Attachment 1 to Response to Question No. 1 Page 5 of 11 Fackler

> Form A Page 3 of 6

# **KENTUCKY UTILITIES COMPANY**

## SALES SCHEDULE (KWH)

Expense Month: February 2021

(A)	Generation (Net)	(+)	1,767,115,445
	Purchases including interchange-in	(+)	64,025,000
	Internal Economy	(+)	107,818,000
	Internal Replacement	(+)	2,211,000
	SUB-TOTAL	-	1,941,169,445

(B)	Inter-system Sales including interchange-out	(+)	20,637,000
	Internal Economy	(+)	32,052,000
	Internal Replacement	(+)	33,343,000
	(*) System Losses	(+)	110,765,691
	SUB-TOTAL		196,797,691

TOTAL SALES (A-B)

1,744,371,754

(\*) Note: See Page 4 of 6, "Adjustment of rolling 12-MTD average overall system losses to reflect losses at retail level"

Attachment 1 to Response to Question No. 1 Page 6 of 11 Fackler

> Form A Page 4 of 6

# **KENTUCKY UTILITIES COMPANY**

## ADJUSTMENT OF ROLLING 12-MTD AVERAGE OVERALL SYSTEM LOSSES TO REFLECT LOSSES AT RETAIL LEVEL

Expense Month : February 2021

12 Months to Date KWH Sources: 12 MTD Overall System Losses: February 2021 KWH Sources:		20,378,523,513   1,162,825,540   1,941,169,445	KWH		
1,162,825,540	/	20,378,523,513	=	5.706132%	
5.706132%	х	1,941,169,445	= 1	10,765,691	КWН

#### WHOLESALE KWH SALES AND LOSSES

95,927,063	Wholesale Sales & Deliveries to ODP at Transmission Voltage	(WS-T)
15,729,920	Wholesale sales at Primary Voltage	(WS-P)
86,032,000	Intersystem Sales at Transmission Voltage	(IS-T)

	Wholesale	Loss		Wholesale
	Sales\Deliveries	Percentage	Losses	Sources
WS-T:	95,927,063	2.153%	2,110,754	98,037,817
WS-P:	15,729,920	2.153% and 0.985%	506,041	16,235,961
IS-T:	86,032,000	0.500%	432,322	86,464,322

Form A Page 5 of 6

## **KENTUCKY UTILITIES COMPANY**

## FUEL ADJUSTMENT CLAUSE OVER OR (UNDER) RECOVERY SCHEDULE

Expense Month : February 2021

1.	Last FAC Rate Billed		 (\$0.00195)
2.	KWH Billed at Above Rate		 1,677,965,970
3.	FAC Revenue/(Refund)	(Line 1 x Line 2)	\$ (3,272,034)
4.	KWH Used to Determine Last FAC Rate		 1,738,143,310
5.	Non-Jurisdictional KWH (Included in Line 4)		 120,511,931
6.	Kentucky Jurisdictional KWH	(Line 4 - Line 5)	 1,617,631,379
7.	Revised FAC Rate Billed, if prior period adjustment	is needed	\$ -
8.	Recoverable FAC Revenue/(Refund)	(Line 1 x Line 6)	\$ (3,154,381)
9.	Over or (Under) Recovery	(Line 3 - Line 8)	\$ (117,653)
10.	Total Sales "Sm" (From Page 3 of 6)		 1,744,371,754
11.	Kentucky Jurisdictional Sales		 1,629,819,428
12.	Total Sales Divided by Kentucky Jurisdictional Sales	s (Line 10 / Line 11)	 1.07028529
13.	Total Company Over or (Under) Recovery	(Line 9 x Line 12)	\$ (125,922)

Attachment 1 to Response to Question No. 1 Page 8 of 11 Form A Page 6 of 6

## FUEL ADJUSTMENT CLAUSE

INTERCOMPANY TRANSACTIONS

Expense Month: February 2021

## KENTUCKY UTILITIES COMPANY

Purchases Internal Economy				KWH	
,	\$	2,290,693.16		107,818,000	Fuel for LGE Sale to KU for Native Load
		185,858.52			Half of Split Savings to LGE from KU
	\$	2,476,551.68		107,818,000	-
Internal Replacement					
	\$	45,930.99		, ,	Freed-up LGE Generation sold back to KU
		-			_LGE Generation for KU Pre-Merger Sales
	\$	45,930.99		2,211,000	
Total Purchases	\$	2,522,482.67	-	110,029,000	-
			-		=
Sales					
Internal Economy					
	\$	593,499.75		32 052 000	KU Fuel Cost - Sales to LGE Native Load
	Ŧ	1,833.23		02,002,000	Half of Split Savings
	\$	595,332.98	-	32,052,000	
laters al Deale consent					
Internal Replacement	\$	1,070,338.20		22 242 000	Freed up KII Concretion cold back to LCE
	φ	1,070,336.20			Freed-up KU Generation sold back to LGE KU Generation for LGE Pre-Merger
		-			KU Generation for LGE IB
	\$	1,070,338.20		33,343,000	
					_
Total Sales	\$	1,665,671.18	:	65,395,000	=

#### LOUISVILLE GAS AND ELECTRIC COMPANY

			KWH	
Purchases				
Internal Economy				
	\$	593,499.75	32,052,000	KU Fuel Cost - Sales to LGE Native Load
		1,833.23		_Half of Split Savings
	\$	595,332.98	32,052,000	
Internal Poplacement				
Internal Replacement	\$	1,070,338.20	33 343 000	Freed-up KU Generation sold back to LGE
	Ψ	1,070,000.20		KU Generation for LGE Pre-Merger
		-		KU Generation for LGE IB
	\$	1,070,338.20	33,343,000	-
	Ŧ	.,	,,	
Total Purchases	\$	1,665,671.18	65,395,000	-
				=
Sales				
Internal Economy				
	\$	2,290,693.16	107,818,000	Fuel for LGE Sale to KU for Native Load
		185,858.52		_Half of Split Savings to LGE from KU
	\$	2,476,551.68	107,818,000	
Internal Replacement				
	\$	45,930.99	2 211 000	Freed-up LGE Generation sold back to KU
	Ψ	+0,900.99		LGE Generation for KU Pre-Merger Sales
	\$	45,930.99	2,211,000	
	Ŧ	.0,000.00	_,,500	
Total Sales	\$	2,522,482.67	110,029,000	-
			. /	=

OSS Adj Page 1 of 3

# OFF-SYSTEM SALES ADJUSTMENT CLAUSE SCHEDULE KENTUCKY UTILITIES COMPANY

Expense Month: February 2021

#### Line No.

1.	Current Month OSS Margins	OSS Page 2	\$	680,685
2.	Customer Sharing			75%
3.	Customer Share of OSS Margins	L. 1 x L. 2	\$	510,514
4.	Current Month True-up	OSS Page 3	\$	(646)
5.	Total Off-System Sales Adjustment	L. 3 + L. 4	\$	509,868
6.	Current Month S(m)	Form A Page 3	1,7	44,371,754
7.	Off-System Sales Adjustment Clause Factor	L.5 ÷ L. 6	\$	0.00029

Attachment 1 to Response to Question No. 1 Page 10 of 11 Fackler

> OSS Adj Page 2 of 3

# OFF-SYSTEM SALES ADJUSTMENT CLAUSE MARGINS KENTUCKY UTILITIES COMPANY

Expense Month: February 2021

#### Line No.

1.	Total OSS Revenues		\$ 2,517,964
2.	Total OSS Expenses		\$ 1,837,279
3.	Total OSS Margins	L. 1 - L. 2	\$ 680,685

## Attachment 1 to Response to Question No. 1 Page 11 of 11 Fackler

OSS Adj Page 3 of 3

## OFF-SYSTEM SALES ADJUSTMENT CLAUSE TRUE UP KENTUCKY UTILITIES COMPANY

Expense Month : February 2021

	Li	r	e
I	Ν	С	).

No. 1.	Last OSS Adjustment Factor Billed		\$	(0.00001)
2.	KWH Billed at Above Rate		1,677	7,965,970
3.	OSS Adjustment Charge (Credit)	(Line 1 x Line 2)	\$	(16,780)
4.	KWH Used to Determine Last OSS Adjustment Factor		1,738	8,143,310
5.	Non-Jurisdictional KWH (Included in Line 4)		120	),511,931
6.	Kentucky Jurisdictional KWH	(Line 4 - Line 5)	1,617	7,631,379
7.	Revised OSS Rate Billed, if prior period adjustment is needed		\$	-
8.	OSS Adjustment Charge (Credit) to be Collected (Distributed)	(Line 1 x Line 6)	\$	(16,176)
9.	(Over) or Under Amount	(Line 3 - Line 8)	\$	(604)
10.	Total Sales "Sm" (From Form A, Page 3 of 6)		1,744	,371,754
11.	Kentucky Jurisdictional Sales		1,629	9,819,428
12.	Total Sales Divided by Kentucky Jurisdictional Sales	(Line 10 / Line 11)	1.	07028529
13.	Total Company (Over) or Under Amount	(Line 9 x Line 12)	\$	(646)

Attachment 2 to Response to Question No. 1 Page 1 of 11 Fackler



Ms. Linda Bridwell Executive Director Kentucky Public Service Commission 211 Sower Boulevard Frankfort, KY 40601-8294

April 20, 2021

Dear Ms. Bridwell:

Kentucky Utilities Company

State Regulation and Rates 220 West Main Street PO Box 32010 Louisville, Kentucky 40232 www.lge-ku.com

Andrea M. Fackler Manager, Revenue Requirement/Cost of Service T 502-627-3442 F 502-627-3213 andrea.fackler@lge-ku.com

In compliance with 807 KAR 5:056 and subject to the terms of the Commission's March 16, 2020 and March 24, 2020 Orders in Case No. 2020-00085 (Electronic Emergency Docket Related to the Novel Coronavirus COVID-19 ("COVID-19 Orders"), Kentucky Utilities Company herewith files its adjustment clause factor including the monthly fuel adjustment factor and off-system sales adjustment factor applicable to billings under retail rates during the May 2021 billing cycle which begins April 30, 2021. The original filing in paper medium will be delivered to the Commission consistent with the COVID-19 Orders.

Kentucky Utilities Company is also filing a revised Page 2 of 6 from the February 2021 Form A filing in order to correct the disclosed exclusion amount for the IMEA/IMPA portion of Trimble County Unit 2 fuel cost and 0.5% transmission losses reflected in Note (1). This revision does not impact the recoverable fuel costs and thus there is no change to the resulting FAC factor.

The necessary supporting data to justify the billing factors is included. Please contact me if you have any questions about this filing.

Sincerely,

Andrea M. Sadeler

Andrea M. Fackler

Enclosures

## **REVISED PAGE AS FILED ON 5/14/2021**

## **KENTUCKY UTILITIES COMPANY**

## SUMMARY OF ADJUSTMENT CLAUSES

Expense Month: March 2021

- 1. Fuel Adjustment Clause Factor (Page 1 of 6)(+) \$ (0.00248) / KWH
- 2. Off-System Sales Adjustment Clause Factor (OSS Page 1 of 3)
- 3. Total Adjustment Clause Billing Factor (Line 1 Line 2)

Note: (1) Five decimal places in dollars for normal rounding.

Effective Date for Billing: April 30, 2021

Submitted by Andrea M. Jadeler

Title: Manager, Revenue Requirement/Cost of Service

- (+) \$ (0.00248) / KWH
  (-) \$ 0.00002 / KWH
- = <u>\$ (0.00250)</u> / KWH

## **REVISED PAGE AS FILED ON 5/14/2021**

Form A Page 1 of 6

## **KENTUCKY UTILITIES COMPANY**

# FUEL ADJUSTMENT CLAUSE SCHEDULE

Expense Month: March 2021

Fuel "Fm" (Fuel Cost Schedule)	\$ 31,902,530	= (+) \$	0.02204 / KWH
Sales "Sm" (Sales Schedule)	1,447,350,069 KWH	-(') φ	0.02204 / 1.0011
Per First Revision of PSC approved Ta February 1, 2		= (-) _\$_	0.02452 / KWH

FAC Factor (1) = <u>\$ (0.00248)</u> / KWH

Note: (1) Five decimal places in dollars for normal rounding.

Effective Date for Billing: April 30, 2021

## **REVISED PAGE AS FILED ON 5/14/2021**

Page 2 of 6

# KENTUCKY UTILITIES COMPANY FUEL COST SCHEDULE

Expense Month: March 2021

<ul> <li>(A) Company Generation         <ul> <li>Coal Burned</li> <li>Oil Burned</li> <li>Gas Burned</li> <li>Fuel (assigned cost during Forced Outage)</li> <li>Fuel (substitute cost for Forced Outage)</li> <li>SUB-TOTAL</li> </ul> </li> </ul>	(+) (+) (+) (+) (-)	\$ \$24,694,785 74,233 9,283,260 283,744 169,624 34,052,278	(1) (1) (1)
(B) <u>Purchases</u> Net energy cost - economy purchases Identifiable fuel cost - other purchases Identifiable fuel cost (substitute for Forced Outage) Less Purchases above Highest Cost Units Internal Economy Internal Replacement SUB-TOTAL	(+) (+) (-) (+) (+)	\$ 523,530 - 173 - 355,963 84,096 963,589	
(C) <u>Inter-System Sales</u> Including Interchange-out Internal Economy Internal Replacement Dollars Assigned to Inter-System Sales Losses SUB-TOTAL	(+) (+) (+) (+)	\$ 115,622 2,703,732 2,128 578 2,822,060	
(D) Over or (Under) Recovery From Page 5, Line 13	-	\$ 291,277	
(E) CSR Customers Buy-Through Adjustment	-	\$ _	
TOTAL FUEL RECOVERY (A+B-C-D-E) =	=	\$ 31,902,530	:

Note: (1) Reflects exclusion of IMEA/IMPA portion of Trimble County Unit 2 fuel cost with recognition of 0.5% transmission losses per Commission's Order in Case No. 2012-00552.

Coal burned =	\$7,250
Gas burned =	\$56

Attachment 2 to Response to Question No. 1 Page 5 of 11 Fackler

> Form A Page 3 of 6

# **KENTUCKY UTILITIES COMPANY**

## SALES SCHEDULE (KWH)

Expense Month: March 2021

(A)	Generation (Net)	(+)	1,606,713,262
	Purchases including interchange-in	(+)	59,922,000
	Internal Economy	(+)	17,729,000
	Internal Replacement	(+)	4,007,000
	SUB-TOTAL	-	1,688,371,262

(B)	Inter-system Sales including interchange-out	(+)	5,319,000
	Internal Economy	(+)	141,630,000
	Internal Replacement	(+)	82,000
	(*) System Losses	(+)_	93,990,193
	SUB-TOTAL		241,021,193

TOTAL SALES (A-B)

1,447,350,069

(\*) Note: See Page 4 of 6, "Adjustment of rolling 12-MTD average overall system losses to reflect losses at retail level"

Attachment 2 to Response to Question No. 1 Page 6 of 11 Fackler

> Form A Page 4 of 6

# **KENTUCKY UTILITIES COMPANY**

## ADJUSTMENT OF ROLLING 12-MTD AVERAGE OVERALL SYSTEM LOSSES TO REFLECT LOSSES AT RETAIL LEVEL

Expense Month: March 2021

12 Months to Date KWH Sources: 12 MTD Overall System Losses: March 2021 KWH Sources:		20,572,363,082 1,145,245,968 1,688,371,262	KWH		
1,145,245,968	/	20,572,363,082	=	5.566915%	
5.566915%	х	1,688,371,262	=	93,990,193	KWH

#### WHOLESALE KWH SALES AND LOSSES

75,681,441	Wholesale Sales & Deliveries to ODP at Transmission Voltage	(WS-T)
14,649,000	Wholesale sales at Primary Voltage	(WS-P)
147,031,000	Intersystem Sales at Transmission Voltage	(IS-T)

	Wholesale	Loss		Wholesale
	Sales\Deliveries	Percentage	Losses	Sources
WS-T:	75,681,441	2.153%	1,665,275	77,346,716
WS-P:	14,649,000	2.153% and 0.985%	471,267	15,120,267
IS-T:	147,031,000	0.500%	738,849	147,769,849

Form A Page 5 of 6

## **KENTUCKY UTILITIES COMPANY**

## FUEL ADJUSTMENT CLAUSE OVER OR (UNDER) RECOVERY SCHEDULE

Expense Month : March 2021

1.	Last FAC Rate Billed		 (\$0.00167)
2.	KWH Billed at Above Rate		 1,524,224,809
3.	FAC Revenue/(Refund)	(Line 1 x Line 2)	\$ (2,545,455)
4.	KWH Used to Determine Last FAC Rate		 1,812,064,985
5.	Non-Jurisdictional KWH (Included in Line 4)		 124,580,988
6.	Kentucky Jurisdictional KWH	(Line 4 - Line 5)	 1,687,483,997
7.	Revised FAC Rate Billed, if prior period adjustment is	needed	\$ -
8.	Recoverable FAC Revenue/(Refund)	(Line 1 x Line 6)	\$ (2,818,098)
9.	Over or (Under) Recovery	(Line 3 - Line 8)	\$ 272,643
10.	Total Sales "Sm" (From Page 3 of 6)		 1,447,350,069
11.	Kentucky Jurisdictional Sales		 1,354,757,857
12.	Total Sales Divided by Kentucky Jurisdictional Sales	(Line 10 / Line 11)	 1.06834595
13.	Total Company Over or (Under) Recovery	(Line 9 x Line 12)	\$ 291,277

## FUEL ADJUSTMENT CLAUSE

INTERCOMPANY TRANSACTIONS

Expense Month : March 2021

#### KENTUCKY UTILITIES COMPANY

Purchases Internal Economy			KWH	
······,	\$ 355,694.66 267.94		17,729,000	Fuel for LGE Sale to KU for Native Load Half of Split Savings to LGE from KU
	\$ 355,962.60		17,729,000	
Internal Replacement				
	\$ 84,096.26 -			Freed-up LGE Generation sold back to KU LGE Generation for KU Pre-Merger Sales
	\$ 84,096.26		4,007,000	
Total Purchases	\$ 440,058.86	•	21,736,000	-
Sales				
Internal Economy	\$ 2,698,810.71		141.630.000	KU Fuel Cost - Sales to LGE Native Load
	4,921.44			Half of Split Savings
	\$ 2,703,732.15		141,630,000	
Internal Replacement				
	\$ 2,128.13			Freed-up KU Generation sold back to LGE
	-			KU Generation for LGE Pre-Merger KU Generation for LGE IB
	\$ 2,128.13		82,000	
Total Sales	\$ 2,705,860.28		141,712,000	-
				-

#### LOUISVILLE GAS AND ELECTRIC COMPANY

			KWH	
Purchases				
Internal Economy	\$	0 600 040 74	141 620 000	KIL Fuel Cest. Salas to LOF Nativa Load
	φ	2,698,810.71 4,921.44	141,030,000	KU Fuel Cost - Sales to LGE Native Load Half of Split Savings
	\$	2,703,732.15	141,630,000	
		, ,	, ,	
Internal Replacement				
	\$	2,128.13		Freed-up KU Generation sold back to LGE
		-	0	······································
	\$	2,128.13	82,000	
	Ŧ	_,	,	
Total Purchases	\$	2,705,860.28	141,712,000	-
Sales				
Internal Economy				
	\$	355,694.66	17,729,000	Fuel for LGE Sale to KU for Native Load
		267.94		Half of Split Savings to LGE from KU
	\$	355,962.60	17,729,000	
Internal Replacement				
internal Replacement	\$	84,096.26	4 007 000	Freed-up LGE Generation sold back to KU
	Ψ	-		LGE Generation for KU Pre-Merger Sales
	\$	84,096.26	4,007,000	
				-
Total Sales	\$	440,058.86	21,736,000	=

OSS Adj Page 1 of 3

# OFF-SYSTEM SALES ADJUSTMENT CLAUSE SCHEDULE KENTUCKY UTILITIES COMPANY

Expense Month: March 2021

#### Line No.

1.	Current Month OSS Margins	OSS Page 2	\$	35,332
2.	Customer Sharing			75%
3.	Customer Share of OSS Margins	L. 1 x L. 2	\$	26,499
4.	Current Month True-up	OSS Page 3	\$	0
5.	Total Off-System Sales Adjustment	L. 3 + L. 4	\$	26,499
6.	Current Month S(m)	Form A Page 3	1,44	7,350,069
7.	Off-System Sales Adjustment Clause Factor	L.5 ÷ L. 6	\$	0.00002

Attachment 2 to Response to Question No. 1 Page 10 of 11 Fackler

> OSS Adj Page 2 of 3

# OFF-SYSTEM SALES ADJUSTMENT CLAUSE MARGINS KENTUCKY UTILITIES COMPANY

Expense Month: March 2021

#### Line No.

1.	Total OSS Revenues		\$	182,761
2.	Total OSS Expenses		<u> </u>	147,429
3.	Total OSS Margins	L. 1 - L. 2	\$	35,332

## Attachment 2 to Response to Question No. 1 Page 11 of 11 Fackler

OSS Adj Page 3 of 3

## OFF-SYSTEM SALES ADJUSTMENT CLAUSE TRUE UP KENTUCKY UTILITIES COMPANY

Expense Month: March 2021

Line	
No.	

No. 1.	Last OSS Adjustment Factor Billed		\$
2.	KWH Billed at Above Rate		1,524,224,809
3.	OSS Adjustment Charge (Credit)	(Line 1 x Line 2)	\$-
4.	KWH Used to Determine Last OSS Adjustment Factor		1,812,064,985
5.	Non-Jurisdictional KWH (Included in Line 4)		124,580,988
6.	Kentucky Jurisdictional KWH	(Line 4 - Line 5)	1,687,483,997
7.	Revised OSS Rate Billed, if prior period adjustment is needed		\$ -
8.	OSS Adjustment Charge (Credit) to be Collected (Distributed)	(Line 1 x Line 6)	\$
9.	(Over) or Under Amount	(Line 3 - Line 8)	\$-
10.	Total Sales "Sm" (From Form A, Page 3 of 6)		1,447,350,069
11.	Kentucky Jurisdictional Sales		1,354,757,857
12.	Total Sales Divided by Kentucky Jurisdictional Sales	(Line 10 / Line 11)	1.06834595
13.	Total Company (Over) or Under Amount	(Line 9 x Line 12)	\$

Attachment 3 to Response to Question No. 1 Page 1 of 12 Fackler



Ms. Linda Bridwell Executive Director Kentucky Public Service Commission 211 Sower Boulevard Frankfort, KY 40601-8294

September 17, 2021

Dear Ms. Bridwell:

In compliance with 807 KAR 5:056 and subject to the terms of the Commission's July 22, 2021 Order in Case No. 2020-00085 (Electronic Emergency Docket Related to the Novel Coronavirus COVID-19 ("COVID-19 Orders"), Kentucky Utilities Company herewith files its adjustment clause factor including the monthly fuel adjustment factor and off-system sales adjustment factor applicable to billings under retail rates during the October 2021 billing cycle which begins September 29, 2021. The original filing in paper medium will be delivered to the Commission consistent with the COVID-19 Orders.

The necessary supporting data to justify the billing factors is included. Please contact me if you have any questions about this filing.

Sincerely,

Indrea M. Jackler

Andrea M. Fackler

Enclosures

Kentucky Utilities Company State Regulation and Rates 220 West Main Street PO Box 32010 Louisville, Kentucky 40232 www.lge-ku.com

Andrea M. Fackler Manager, Revenue Requirement/Cost of Service T 502-627-3442 F 502-627-3213 andrea.fackler@lge-ku.com

Attachment 3 to Response to Question No. 1 Page 2 of 12 Fackler



Ms. Linda Bridwell Executive Director Kentucky Public Service Commission 211 Sower Boulevard Frankfort, KY 40601-8294

September 21, 2021

Dear Ms. Bridwell:

Kentucky Utilities Company State Regulation and Rates 220 West Main Street PO Box 32010

Louisville, Kentucky 40232 www.lge-ku.com

Andrea M. Fackler Manager, Revenue Requirement/Cost of Service T 502-627-3442 F 502-627-3213 andrea.fackler@lge-ku.com

In compliance with 807 KAR 5:056 and subject to the terms of the Commission's July 22, 2021 Order in Case No. 2020-00085 (Electronic Emergency Docket Related to the Novel Coronavirus COVID-19 ("COVID-19 Orders"), Kentucky Utilities Company is filing a revised FAC Form A Page 2 of 6 due to revisions that were made to the August 2021 forced outage calculation after the original FAC Form A filing on September 17, 2021. Revisions are reflected under Company Generation (Fuel-Assigned Cost During Forced Outage and Fuel – Substitute Cost for Forced Outage) and Purchases (Identifiable Fuel Cost – Substitute for Forced Outage). These revisions do not impact the total recoverable fuel costs or fuel adjustment factor.

Please contact me if you have any questions about this filing.

Sincerely,

dieg M. Jaller

Andrea M. Fackler

Enclosures

Attachment 3 to Response to Question No. 1 Page 3 of 12 Fackler

## **KENTUCKY UTILITIES COMPANY**

#### SUMMARY OF ADJUSTMENT CLAUSES

Expense Month : August 2021

 1. Fuel Adjustment Clause Factor (Page 1 of 6)
 (+) \$ 0.00017 / KWH

 2. Off-System Sales Adjustment Clause Factor (OSS Page 1 of 3)
 (-) \$ 0.00045 / KWH

 3. Total Adjustment Clause Billing Factor (Line 1 - Line 2)
 = \$ (0.00028) / KWH

Note: (1) Five decimal places in dollars for normal rounding.

Effective Date for Billing: September 29, 2021

Na M-Submitted by

Title: Manager, Revenue Requirement/Cost of Service

Attachment 3 to Response to Question No. 1 Page 4 of 12 Fackler

> Form A Page 1 of 6

## **KENTUCKY UTILITIES COMPANY**

## FUEL ADJUSTMENT CLAUSE SCHEDULE

Expense Month: August 2021

Fuel "Fm" (Fuel Cost Schedule)	\$ 41,816,117	= (+) \$	0.02412 / KWH
Sales "Sm" (Sales Schedule)	1,733,472,911 KWH	(·) Φ	0.02412 / 10011
Per First Revision of PSC approved Ta August 1, 202		= (-) _\$	<u>0.02395</u> / KWH
	FAC Factor (1)	= _\$	0.00017 / KWH

Note: (1) Five decimal places in dollars for normal rounding.

Effective Date for Billing: September 29, 2021

Attachment 3 to Response to Question No. 1 Page 5 of 12 Fackler Form A

Page 2 of 6

# KENTUCKY UTILITIES COMPANY FUEL COST SCHEDULE

Expense Month: August 2021

<ul> <li>(A) Company Generation         <ul> <li>Coal Burned</li> <li>Oil Burned</li> <li>Gas Burned</li> <li>Fuel (assigned cost during Forced Outage)</li> <li>Fuel (substitute cost for Forced Outage)</li> <li>SUB-TOTAL</li> </ul> </li> </ul>	(+) (+) (+) (+) (-)	\$31,720,424 205,680 12,033,930 713,720 691,402 43,960,034	(1) (1) (1)
(B) <u>Purchases</u> Net energy cost - economy purchases Identifiable fuel cost - other purchases Identifiable fuel cost (substitute for Forced Outage) Less Purchases above Highest Cost Units Internal Economy Internal Replacement SUB-TOTAL	(+) { (+) (-) (+) (+) (+)	- 1,326 - 73,538 788,169	
(C) <u>Inter-System Sales</u> Including Interchange-out Internal Economy Internal Replacement Dollars Assigned to Inter-System Sales Losses SUB-TOTAL	(+) { (+) (+) (+)	2,269,441 1,369 7,721	-
(D) Over or (Under) Recovery From Page 5, Line 13	9	\$ (183,570)	_
(E) CSR Customers Buy-Through Adjustment		23,929	-
TOTAL FUEL RECOVERY (A+B-C-D-E) =		41,816,117	

Note: (1) Reflects exclusion of IMEA/IMPA portion of Trimble County Unit 2 fuel cost with recognition of 0.5% transmission losses per Commission's Order in Case No. 2012-00552.

Coal burned =	\$9,829
Gas burned =	\$130

## **REVISED PAGE AS FILED ON 9/21/2021**

Attachment 3 to Response to Question No. 1 Page 6 of 12 Fackler

> Form A Page 3 of 6

# **KENTUCKY UTILITIES COMPANY**

## SALES SCHEDULE (KWH)

Expense Month: August 2021

Generation (Net)	(+)	1,910,987,829
Purchases including interchange-in	(+)	66,077,000
Internal Economy	(+)	3,486,000
Internal Replacement	(+)	35,224,000
SUB-TOTAL		2,015,774,829
	Purchases including interchange-in Internal Economy Internal Replacement	Purchases including interchange-in(+)Internal Economy(+)Internal Replacement(+)

(B)	Inter-system Sales including interchange-out	(+)	66,149,000
	Internal Economy	(+)	105,967,000
	Internal Replacement	(+)	54,000
	(*) System Losses	(+)	110,131,918
	SUB-TOTAL		282,301,918

TOTAL SALES (A-B)

1,733,472,911

(\*) Note: See Page 4 of 6, "Adjustment of rolling 12-MTD average overall system losses to reflect losses at retail level"

Attachment 3 to Response to Question No. 1 Page 7 of 12 Fackler

> Form A Page 4 of 6

## **KENTUCKY UTILITIES COMPANY**

# ADJUSTMENT OF ROLLING 12-MTD AVERAGE OVERALL SYSTEM LOSSES TO REFLECT LOSSES AT RETAIL LEVEL

Expense Month: August 2021

12 Months to Date KWH Sources: 12 MTD Overall System Losses: August 2021 KWH Sources:		20,795,892,744 1,136,184,202 2,015,774,829	KWH		
1,136,184,202	/	20,795,892,744	=	5.463503%	
5.463503%	х	2,015,774,829	=	110,131,918	KWH

#### WHOLESALE KWH SALES AND LOSSES

72,101,361	Wholesale Sales & Deliveries to ODP at Transmission Voltage	(WS-T)
18,659,360	Wholesale sales at Primary Voltage	(WS-P)
172,170,000	Intersystem Sales at Transmission Voltage	(IS-T)

	Wholesale	Loss		Wholesale
	Sales\Deliveries	Percentage	Losses	Sources
WS-T:	72,101,361	2.153%	1,586,500	73,687,861
WS-P:	18,659,360	2.153% and 0.985%	600,283	19,259,643
IS-T:	172,170,000	0.500%	865,176	173,035,176

Form A Page 5 of 6

## **KENTUCKY UTILITIES COMPANY**

## FUEL ADJUSTMENT CLAUSE OVER OR (UNDER) RECOVERY SCHEDULE

Expense Month: August 2021

1.	Last FAC Rate Billed		 (\$0.00140)
2.	KWH Billed at Above Rate		 1,614,344,009
3.	FAC Revenue/(Refund)	(Line 1 x Line 2)	\$ (2,260,082)
4.	KWH Used to Determine Last FAC Rate		 1,576,051,424
5.	Non-Jurisdictional KWH (Included in Line 4)		 85,804,480
6.	Kentucky Jurisdictional KWH	(Line 4 - Line 5)	 1,490,246,944
7. Revised FAC Rate Billed, if prior period adjustment is needed			\$ -
8.	Recoverable FAC Revenue/(Refund)	(Line 1 x Line 6)	\$ (2,086,346)
9.	Over or (Under) Recovery	(Line 3 - Line 8)	\$ (173,736)
10.	Total Sales "Sm" (From Page 3 of 6)		 1,733,472,911
11.	Kentucky Jurisdictional Sales		 1,640,608,445
12.	Total Sales Divided by Kentucky Jurisdictional Sa	les (Line 10 / Line 11)	 1.05660367
13.	Total Company Over or (Under) Recovery	(Line 9 x Line 12)	\$ (183,570)

#### FUEL ADJUSTMENT CLAUSE

INTERCOMPANY TRANSACTIONS

Expense Month: August 2021

#### **KENTUCKY UTILITIES COMPANY**

Purchases Internal Economy		KWH	
	\$ 73,146.81 391.49	3,486,000	Fuel for LGE Sale to KU for Native Load Half of Split Savings to LGE from KU
	\$ 73,538.30	3,486,000	
Internal Replacement			
	\$ 788,169.10 -		Freed-up LGE Generation sold back to KU LGE Generation for KU Pre-Merger Sales
	\$ 788,169.10	35,224,000	
Total Purchases	\$ 861,707.40	38,710,000	-
Sales Internal Economy			
	\$ 2,220,920.87 48,519.65	105,967,000	KU Fuel Cost - Sales to LGE Native Load Half of Split Savings
	\$ 2,269,440.52	105,967,000	
Internal Replacement			
	\$ 1,368.86 -	0	Freed-up KU Generation sold back to LGE KU Generation for LGE Pre-Merger KU Generation for LGE IB
	\$ 1,368.86	54,000	
Total Sales	\$ 2,270,809.38	106,021,000	-

#### LOUISVILLE GAS AND ELECTRIC COMPANY

			KWH	
Purchases				
Internal Economy	\$	2,220,920.87	105 967 000	KU Fuel Cost - Sales to LGE Native Load
	φ	48,519.65	105,907,000	Half of Split Savings
	\$	2,269,440.52	105,967,000	
Internal Replacement		4 000 00	F4 000	
	\$	1,368.86		Freed-up KU Generation sold back to LGE KU Generation for LGE Pre-Merger
		-		KU Generation for LGE IB
	\$	1,368.86	54,000	
				_
Total Purchases	\$	2,270,809.38	106,021,000	=
Sales				
Internal Economy				
-	\$	73,146.81	3,486,000	Fuel for LGE Sale to KU for Native Load
	_	391.49		_Half of Split Savings to LGE from KU
	\$	73,538.30	3,486,000	
Internal Replacement				
	\$	788,169.10	35,224,000	Freed-up LGE Generation sold back to KU
				LGE Generation for KU Pre-Merger Sales
	\$	788,169.10	35,224,000	
Total Sales	¢	861,707.40	38,710,000	-
	φ	001,707.40	30,710,000	=

OSS Adj Page 1 of 3

# OFF-SYSTEM SALES ADJUSTMENT CLAUSE SCHEDULE KENTUCKY UTILITIES COMPANY

Expense Month: August 2021

#### Line No.

1.	Current Month OSS Margins	OSS Page 2	\$	1,089,879
2.	Customer Sharing			75%
3.	Customer Share of OSS Margins	L. 1 x L. 2	\$	817,409
4.	Current Month True-up	OSS Page 3	\$	(40,648)
5.	Total Off-System Sales Adjustment	L. 3 + L. 4	\$	776,761
6.	Current Month S(m)	Form A Page 3	1,	733,472,911
7.	Off-System Sales Adjustment Clause Factor	L.5 ÷ L. 6	\$	0.00045

Attachment 3 to Response to Question No. 1 Page 11 of 12 Fackler

> OSS Adj Page 2 of 3

# OFF-SYSTEM SALES ADJUSTMENT CLAUSE MARGINS KENTUCKY UTILITIES COMPANY

Expense Month: August 2021

#### Line No.

1.	Total OSS Revenues		\$ 3,149,605
2.	Total OSS Expenses		\$ 2,059,726
3.	Total OSS Margins	L. 1 - L. 2	\$ 1,089,879

Attachment 3 to Response to Question No. 1 Page 12 of 12 Fackler

> OSS Adj Page 3 of 3

## OFF-SYSTEM SALES ADJUSTMENT CLAUSE TRUE UP KENTUCKY UTILITIES COMPANY

Expense Month : August 2021

Line
No.

No.			
1.	Last OSS Adjustment Factor Billed		\$ (0.00031)
2.	KWH Billed at Above Rate		1,614,344,009
3.	OSS Adjustment Charge (Credit)	(Line 1 x Line 2)	\$ (500,447)
4.	KWH Used to Determine Last OSS Adjustment Factor		1,576,051,424
5.	Non-Jurisdictional KWH (Included in Line 4)		85,804,480
6.	Kentucky Jurisdictional KWH	(Line 4 - Line 5)	1,490,246,944
7.	Revised OSS Rate Billed, if prior period adjustment is needed		\$-
8.	OSS Adjustment Charge (Credit) to be Collected (Distributed)	(Line 1 x Line 6)	\$ (461,977)
9.	(Over) or Under Amount	(Line 3 - Line 8)	\$ (38,470)
10.	Total Sales "Sm" (From Form A, Page 3 of 6)		1,733,472,911
11.	Kentucky Jurisdictional Sales		1,640,608,445
12.	Total Sales Divided by Kentucky Jurisdictional Sales	(Line 10 / Line 11)	1.05660367
13.	Total Company (Over) or Under Amount	(Line 9 x Line 12)	\$ (40,648)

## KENTUCKY UTILITIES COMPANY

## Response to Commission Staff's Second Request for Information Dated October 5, 2023

## Case No. 2023-00011

## **Question No. 2**

## **Responding Witness: Andrea M. Fackler**

- Q-2. For each month of the review period, provide the total amount of fuel related cost that occurred during a forced outage that was disallowed pursuant to 807 KAR 5:056, or that KU was unable to collect via any other means.
- A-2. For the period under review, the total amounts for fuel related cost assigned to a generating unit during a forced outage that were disallowed from recovery through the FAC pursuant to 807 KAR 5:056 are shown in the following table.

Month	Amount
Nov-20	\$ 38,390
Dec-20	-
Jan-21	273,716
Feb-21	-
Mar-21	-
Apr-21	-
May-21	-
Jun-21	-
Jul-21	-
Aug-21	-
Sep-21	36,807
Oct-21	-
Nov-21	52,669
Dec-21	-
Jan-22	-
Feb-22	299,036
Mar-22	-
Apr-22	26,463
May-22	796,073
Jun-22	-
Jul-22	-
Aug-22	31,815
Sep-22	-
Oct-22	192,814
Total	\$ 1,747,783

The Company does not recover actual costs excluded from recovery in the FAC via any other means. However, the Company recovers through base rates an amount of fuel related costs associated with forced outages based on a three-year average of historical actual exclusion amounts disallowed from recovery in the Fuel Adjustment Clause pursuant to 807 KAR 5:056. For the period under review, the annual jurisdictional amount of forced outage exclusion costs embedded in base rates for the period prior to July 1, 2021<sup>3</sup> was \$1,421,147 and the annual jurisdictional amount of forced outage exclusion costs embedded in base rates for the period outage exclusion costs embedded in base rates for the period after July 1, 2021<sup>4</sup> was \$688,099.

<sup>&</sup>lt;sup>3</sup> Electronic Application of Kentucky Utilities Company for an Adjustment of Its Electric Rates, Case No. 2018-00294, Order issued April 30, 2019 establishing base rates effective May 1, 2019.

<sup>&</sup>lt;sup>4</sup> Electronic Application of Kentucky Utilities Company for an Adjustment of Its Electric Rates, a Certificate of Public Convenience and Necessity to Deploy Advanced Metering Infrastructure, Approval of Certain Regulatory and Accounting Treatments, and Establishment of a One-Year Surcredit, Case No. 2020-00349, Order issued June 30, 2021 establishing base rates effective July 1, 2021.