

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

**In the Matter of:**

**AN ELECTRONIC EXAMINATION OF THE )**  
**APPLICATION OF THE FUEL ADJUSTMENT )**  
**CLAUSE OF LOUISVILLE GAS AND ) CASE NO. 2023-00011**  
**ELECTRIC COMPANY FROM NOVEMBER 1, )**  
**2020 THROUGH OCTOBER 31, 2022 )**

**RESPONSE OF**  
**LOUISVILLE GAS AND ELECTRIC COMPANY**  
**TO**  
**THE COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION**  
**DATED SEPTEMBER 6, 2023**

**FILED: SEPTEMBER 22, 2023**

VERIFICATION

COMMONWEALTH OF KENTUCKY )  
 )  
COUNTY OF JEFFERSON )

The undersigned, **Delbert Billiter**, being duly sworn, deposes and says that he is Director – Coal Supply and By Product Marketing for LG&E and KU Services Company, and that he has personal knowledge of the matters set forth in the foregoing testimony, and that the answers contained therein are true and correct to the best of his information, knowledge, and belief.

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

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 18<sup>th</sup> day of September 2023.

*Caroline J. Davison*  
\_\_\_\_\_  
Notary Public

Notary Public ID No. KYNP63286

My Commission Expires:

January 22, 2027





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, and that she has personal knowledge of the matters set forth in the foregoing testimony, and that the answers contained therein are true and correct to the best of her information, knowledge, and belief.

*Andrea M Fackler*  
\_\_\_\_\_  
**Andrea M. Fackler**

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 11<sup>th</sup> day of September 2023.

*Caroline J. Davison*  
\_\_\_\_\_  
Notary Public

Notary Public ID No. KYNP63286

My Commission Expires:

January 22, 2027



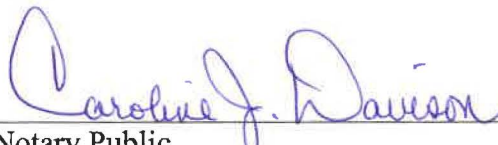
**VERIFICATION**

**COMMONWEALTH OF KENTUCKY** )  
)  
**COUNTY OF JEFFERSON** )

The undersigned, **Charles R. Schram**, being duly sworn, deposes and says that he is Director – Power Supply for LG&E and KU Services Company, and that he has personal knowledge of the matters set forth in the foregoing testimony, and that the answers contained therein are true and correct to the best of his information, knowledge, and belief.

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

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 12<sup>th</sup> day of September 2023.

  
\_\_\_\_\_  
Notary Public

Notary Public ID No. KYNP63286

My Commission Expires:

January 22, 2027



VERIFICATION

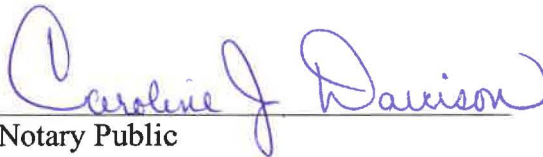
COMMONWEALTH OF KENTUCKY )  
 )  
COUNTY OF JEFFERSON )

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, and that he has personal knowledge of the matters set forth in the foregoing testimony, and that the answers contained therein are true and correct to the best of his information, knowledge, and belief.



**Stuart A. Wilson**

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 12<sup>th</sup> day of September 2023.



Notary Public

Notary Public ID No. KYNP63286

My Commission Expires:

January 22, 2027



**LOUISVILLE GAS AND ELECTRIC COMPANY**

**Response to Commission Staff's First Request for Information  
Dated September 6, 2023**

**Case No. 2023-00011**

**Question No. 1**

**Responding Witness: Delbert Billiter**

Q-1. For the period from May 1, 2022, to October 31, 2022, (the last six months of the period under review), provide the amount of coal purchased in tons and the percentage of purchases that were spot versus contract.

A-1. During the period from May 1, 2022 to October 31, 2022, the Company purchased 3,180,776 tons of coal.

Spot:	18%	(582,636 tons)
Contract:	82%	(2,598,140 tons)

**LOUISVILLE GAS AND ELECTRIC COMPANY**

**Response to Commission Staff's First Request for Information  
Dated September 6, 2023**

**Case No. 2023-00011**

**Question No. 2**

**Responding Witness: Delbert Billiter**

- Q-2. For the last six months of the period under review, list each coal purchase made under a long-term contract (one year or greater). For each purchase, list the following:
- a. Contract or purchase order number;
  - b. The supplier's name;
  - c. The location(s) of production facilities from which the coal is sourced;
  - d. The method of delivery, (i.e., barge, truck, rail, other);
  - e. The actual quantity received during the review period; and
  - f. Current price paid per ton.
- A-2. See attached. For the last six months of the period under review, Page 1 of the attachment shows only the actual quantity received by the Company under each contract, and Page 2 shows the actual combined quantity received by LG&E and KU under each contract.



LG&E Coal Purchases (unloaded) under long-term contract						
May 1, 2022 through October 31, 2022						
( a )	( b )	( c )	( d )	( e )	( f )	( g )
Contract/PO	Supplier	Location of Production Facility	Delivery Method	Actual Quantity Received	Tonnage Requirement*	Current Price** (\$/ton)
J17004B	ACNR Coal Sales, Inc	IL, WV, W-KY	Barge, Rail	217,277	840,000	\$45.15-IL, \$44.15-WV, \$43.50-KY(R)
J21002	ACNR Coal Sales, Inc	W-KY	Barge, Rail	479,436	500,000	\$42.45
J21003	Alliance Coal LLC	W-KY	Rail	486,554	500,000	\$41.95
J21004	Alliance Coal LLC	W-KY, WV, IL	Barge	884,358	1,750,000	\$40.846-KY, \$43.496-WV, \$41.50-IL
J21010	Alliance Coal LLC	W-KY	Barge	154,433	350,000	\$40.20
J22004	Alliance Coal LLC	W-KY, WV	Barge, Rail	180,054	333,333	\$80.00-KY, \$78.58-KY(R) \$86.65-WV
J22013	Alliance Coal LLC	W-KY, WV, IL	Barge, Rail	269,389	562,500	\$79.88-KY, \$79.86-KY(R), \$86.45-WV, \$81.36-IL
J20002	Arch Coal Sales Company Inc.	WY	Barge	-	250,000	\$13.36
J20024	Coal Network LLC	multi-state	Barge	3,063	-	\$25.00
J22014	Coal Network LLC	OH	Barge	16,604	48,000	\$56.67
J22016	Coal Network LLC	IN	Barge	7,739	30,000	\$135.00
J21011	Foresight Coal Sales LLC	IL	Barge	124,009	257,412	\$33.20
J20001C	Iron Coal Sales LLC	PA	Barge	12,961	303,208	\$46.94
J21001	Knight Hawk Coal, LLC	IL	Barge	138,775	250,000	\$39.13
J21022	Knight Hawk Coal, LLC	IL	Barge	97,275	125,000	\$36.74
J21009	Peabody COALSALES LLC	IN	Barge, Rail, Truck	-	330,000	\$35.77
J22003	Peabody COALSALES LLC	IL	Barge	108,850	66,667	\$43.10
J20006	Western Kentucky Minerals, Inc	W-KY	Barge	-	-	\$49.58
				3,180,776		

\*Tonnage Requirement is a ratable volume for combined LG&E and KU coal station shipments

\*\*Prices vary by source/transportation type. Prices as of 10/31/22

**Combined LG&E and KU Coal Purchases (unloaded) under long-term contract**

**May 1, 2022 through October 31, 2022**

(a)	(b)	(c)	(d)	(e)	(f)	(g)
Contract/PO	Supplier	Location of Production Facility	Delivery Method	Actual Quantity Received	Tonnage Requirement*	Current Price** (\$/ton)
J17004B	ACNR Coal Sales, Inc	IL, WV, W-KY	Barge, Rail	664,720	840,000	\$45.15-IL, \$44.15-WV, \$43.50-KY(R)
J21002	ACNR Coal Sales, Inc	W-KY	Barge, Rail	479,436	500,000	\$42.45
J21003	Alliance Coal LLC	W-KY	Rail	486,554	500,000	\$41.95
J21004	Alliance Coal LLC	W-KY, WV, IL	Barge	1,749,553	1,750,000	\$40.846-KY, \$43.496-WV, \$41.50-IL
J21010	Alliance Coal LLC	W-KY	Barge	360,965	350,000	\$40.20
J22004	Alliance Coal LLC	W-KY, WV	Barge, Rail	312,189	333,333	\$80.00-KY, \$78.58-KY(R) \$86.65-WV
J22013	Alliance Coal LLC	W-KY, WV, IL	Barge, Rail	467,337	562,500	\$79.88-KY, \$79.86-KY(R), \$86.45-WV, \$81.36-IL
J20002	Arch Coal Sales Company Inc.	WY	Barge	360,746	250,000	\$13.36
J20024	Coal Network LLC	multi-state	Barge	4,770	-	\$25.00
J22014	Coal Network LLC	OH	Barge	44,455	48,000	\$56.67
J22016	Coal Network LLC	IN	Barge	12,557	30,000	\$135.00
J21011	Foresight Coal Sales LLC	IL	Barge	228,793	257,412	\$33.20
J20001C	Iron Coal Sales LLC	PA	Barge	317,255	303,208	\$46.94
J21001	Knight Hawk Coal, LLC	IL	Barge	211,837	250,000	\$39.13
J21022	Knight Hawk Coal, LLC	IL	Barge	131,219	125,000	\$36.74
J21009	Peabody COALSALS LLC	IN	Barge, Rail, Truck	279,838	330,000	\$35.77
J22003	Peabody COALSALS LLC	IL	Barge	120,552	66,667	\$43.10
J20006	Western Kentucky Minerals, Inc	W-KY	Barge	-	-	\$49.58
				6,232,775	6,496,120	

\*Tonnage Requirement is a ratable volume for combined LG&E and KU coal station shipments

\*\*Prices vary by source/transportation type. Prices as of 10/31/22

**Attachment to Response to Question No. 2**

**BILLITER**

**Page 2 of 2**

LOUISVILLE GAS AND ELECTRIC COMPANY

Response to Commission Staff’s First Request for Information

Dated September 6, 2023

Case No. 2023-00011

Question No. 3

Responding Witness: Delbert Billiter

Q-3.

- a. As of the last day of the review period, state the coal inventory level in tons and in number of days’ supply. Provide this information by generating station and in the aggregate.
- b. Describe the criteria used to determine number of days’ supply.
- c. State the target coal inventory level for each generating station and for the total system.
- d. If actual coal inventory exceeds the target inventory by ten days’ supply, state the reasons for the excess inventory.

(1) State whether any significant changes in the current coal inventory target are expected within the next 12 months.

(2) If so, state the expected change and the reasons for this change.

A-3.

- a. As of October 31, 2022:

Mill Creek	439,391 Tons; 30 Days	Target 20-39 Days
<u>Trimble County<sup>1</sup></u>	<u>191,042 Tons; 38 Days</u>	<u>Target 21-43 Days</u>
Total	630,433 Tons; 31 Days	Target 20-39 Days

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

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

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

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

- c. See (a) above.
- d. Not applicable.
- e. Inventory targets are evaluated during the Companies’ annual planning cycle and adjustments to the inventory targets are made if warranted. The Company anticipates that inventory targets may increase above those currently listed as a result of additional risk to the coal supply chain identified over the past year.

**LOUISVILLE GAS AND ELECTRIC COMPANY**

**Response to Commission Staff's First Request for Information  
Dated September 6, 2023**

**Case No. 2023-00011**

**Question No. 4**

**Responding Witness: Delbert Billiter**

Q-4. List each written coal supply solicitation issued during the last six months of the period under review.

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

A-4.

- a. SOLICITATION 1 - LGE KU 22-05

Date: June 9, 2022  
Contract/Spot: Spot  
Quantities: No minimum or maximum specified  
Quality: Suitable for KU's Ghent Station, LG&E's Mill Creek Station, and KU's and LG&E's Trimble County Station  
Period: Q3/2022 through Q2/2023 – Spot  
Generating Units: All units at Ghent, Trimble County and Mill Creek Stations

- b. Number of vendors sent a solicitation: 60  
Number of vendors responded: 4 companies / 4 offers  
Selected vendor(s): The vendors selected were based upon the lowest evaluated delivered cost, operational and environmental requirements of the coal units, and other factors impacting coal supply reliability as noted on the attached bid evaluation sheets.

High Sulfur Coal - Spot

Coal Network, LLC – J22016 / lowest Q3 2022 through Q2 2023 offer

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

a. SOLICITATION 2 - LGE KU 22-07

Date: August 31, 2022  
Contract/Spot: Contract and Spot  
Quantities: No minimum or maximum specified  
Quality: Suitable for KU's Ghent Station, E.W. Brown Station, LG&E's Mill Creek Station, and KU's and LG&E's Trimble County Station  
Period: Q4/2022 – Spot  
2023-2033 - Contract  
Generating Units: All units at Ghent, E.W. Brown, Trimble County and Mill Creek Stations

b. Number of vendors sent a solicitation: 59

Number of vendors responded: 13 companies / 22 offers

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

High Sulfur Coal - Spot

No purchases were made off this solicitation.

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

The entire attachment is  
Confidential and  
provided separately  
under seal.

**LOUISVILLE GAS AND ELECTRIC COMPANY**

**Response to Commission Staff's First Request for Information  
Dated September 6, 2023**

**Case No. 2023-00011**

**Question No. 5**

**Responding Witness: Delbert Billiter**

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



**LOUISVILLE GAS AND ELECTRIC COMPANY**

**Response to Commission Staff's First Request for Information**

**Dated September 6, 2023**

**Case No. 2023-00011**

**Question No. 6**

**Responding Witness: Charles R. Schram**

- Q-6. For the last six months of the period under review, list each vendor from whom natural gas was purchased for generation and the quantities and the nature of each purchase (i.e., spot or contract). Provide the percentage of purchases that were spot versus contract.
- A-6. See the following table for the vendors, quantities, and type of purchases during the last six months of the review period. Approximately 75% of the purchases were spot versus 25% forward contract.

Response to Question No. 6

<u>Vendor</u>	<u>Type<sup>1</sup></u>	<u>MMBTU</u>
BP Energy Company	Spot	586,496
Castleton Commodities Merchant Trading L.P.	Spot	108,987
CIMA Energy, LP	Spot	34,750
Citigroup Energy Inc.	Spot	3,000
Colonial Energy, Inc.	Spot	647,497
ConocoPhillips Company	Spot	5,000
Constellation Energy Generation, LLC	Spot	1,233,642
Direct Energy Business Marketing, LLC	Spot	2,700
DTE Energy Trading, Inc.	Spot	105,251
Eco-Energy Natural Gas, LLC	Spot	75,700
EDF Trading North America, LLC	Spot	25,900
Engie Energy Marketing NA, Inc.	Spot	8,100
Hartree Partners, LP	Spot	38,500
J. Aron & Company LLC	Spot	10,000
Kaiser Marketing Appalachian, LLC	Spot	29,700
Koch Energy Services, LLC	Spot	2,497,933
Macquarie Energy, LLC	Spot	32,500
NextEra Energy Marketing, LLC	Spot	991,100
Ovintiv Marketing Inc.	Spot	5,000
Sequent Energy Management LLC	Spot	529,997
Shell Energy North America (US), L.P.	Spot	89,302
Southwest Energy, L.P.	Spot	4,828,914
Spire Marketing Inc.	Spot	119,921
Spotlight Energy, LLC	Spot	85,000
Symmetry Energy Solutions, LLC	Spot	5,000
Tenaska Marketing Ventures	Spot	4,609,952
Tennessee Valley Authority	Spot	30,000
Twin Eagle Resource Management, LLC	Spot	1,368,197
Uniper Global Commodities North America LLC	Spot	142,700
United Energy Trading, LLC	Spot	132,825
Vitol Inc.	Spot	4,985,768
Wells Fargo Commodities, LLC	Spot	244,071
XTO Energy Inc.	Spot	46,776
Columbia Gas of Kentucky, Inc.	GSO Customer <sup>2</sup>	376
LG&E Gas Supply	Special Contract <sup>3</sup>	107,081
EDF Trading North America, LLC	Forward	3,678,296
NextEra Energy Marketing, LLC	Forward	2,743,193
Sequent Energy Management LLC	Forward	913,258
Spire Marketing Inc.	Forward	609,682
	<b>Total Volume</b>	<b>31,711,956</b>

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

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

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

**LOUISVILLE GAS AND ELECTRIC COMPANY**

**Response to Commission Staff's First Request for Information  
Dated September 6, 2023**

**Case No. 2023-00011**

**Question No. 7**

**Responding Witness: Charles R. Schram**

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

**LOUISVILLE GAS AND ELECTRIC COMPANY**

**Response to Commission Staff's First Request for Information  
Dated September 6, 2023**

**Case No. 2023-00011**

**Question No. 8**

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

- Q-8. For the last six month of the period under review, state whether there have been any changes to hedging activities for coal or natural gas purchases used for generation since the previous FAC review proceeding. If so, describe the changes in detail.
- A-8. The Company does not engage in financial hedging activities for its coal or natural gas purchases.

For the last six months of the period under review, there were no changes to the physical hedging practices or guidelines.

**LOUISVILLE GAS AND ELECTRIC COMPANY**

**Response to Commission Staff's First Request for Information  
Dated September 6, 2023**

**Case No. 2023-00011**

**Question No. 9**

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

Q-9.

- a. State whether LG&E has audited any of its fuel or transportation contracts during the last six months of the period under review.
- b. If so, for each audited contract:
  - (1) Identify the contract;
  - (2) Identify the auditor; and
  - (3) State the results of the audit and describe the actions that LG&E took as a result of the audit.

A-9.

- a. No. The Company has not conducted any financial audits of fuel or transportation contracts.

The Company's Manager Coal Supply Services or Mining Engineer conducts scheduled on-site reviews and inspections of the mining operations, scales, and sampling systems of each vendor at a minimum of twice per year, and likewise may conduct unscheduled visits. Additionally, Company employees may visit a vendor as needed to address problems and issues at any time.

- b. Not applicable.

**LOUISVILLE GAS AND ELECTRIC COMPANY**

**Response to Commission Staff's First Request for Information  
Dated September 6, 2023**

**Case No. 2023-00011**

**Question No. 10**

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

Q-10.

- a. State whether LG&E is currently involved in any litigation with its current or former fuel suppliers or transportation vendors.
- b. If yes, for each litigation:
  - (1) Identify the supplier or vendor;
  - (2) Identify the contract involved;
  - (3) State the potential liability or recovery to LG&E;
  - (4) List the issues presented; and
  - (5) Provide a copy of the complaint or other legal pleading that initiated the litigation and any answers or counterclaims. If a copy has previously been filed with the Commission, provide the date on which it was filed and the case in which it was filed.
- c. State the current status of all litigation with suppliers or vendors.

A-10.

- a. The Company is not involved in litigation with any supplier.

**LOUISVILLE GAS AND ELECTRIC COMPANY**

**Response to Commission Staff's First Request for Information  
Dated September 6, 2023**

**Case No. 2023-00011**

**Question No. 11**

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

Q-11.

- a. For the last six months of the period under review, state whether there have been any changes to LG&E's written policies and procedures regarding its fuel procurement.
- b. If yes:
  - (1) Describe the changes;
  - (2) Provide the written policies and procedures as changed;
  - (3) State the date(s) the changes were made; and
  - (4) Explain why the changes were made.
- c. If no, provide the date LG&E's current fuel procurement policies and procedures were last changed, provide the date when they were last provided to the Commission, and identify the proceeding in which they were provided.

A-11.

- a. No changes were made to the Company's written policies and procedures regarding its fuel procurement during the last six months of the period under review.
- b. Not applicable.
- c. See attached Attachment 1. The Coal Supply and By-Products Marketing Procurement Procedures were updated January 17, 2022 and were filed with the Commission on April 15, 2022 in Case No. 2022-00039 in response to Question No. 1-11.

See attached Attachment 2. The Power Supply Commodity Policy – Natural Gas Fuel for Generation was updated January 1, 2020 and was filed with the Commission on September 2, 2020 in Case No. 2020-00248 in response to Question No. 1-11.

**COAL SUPPLY AND BY-PRODUCTS MARKETING PROCUREMENT PROCEDURES**  
**Louisville Gas and Electric Company**  
**Kentucky Utilities Company**

**A. Definitions:**

1. "Agreement" means a legally binding document, in which one party agrees to sell and the other agrees to buy Fuel, fully executed by both Buyer and Seller.
2. "Authority Limit Matrix" – The Authority Limit Matrix (ALM) is a Company policy to be used in combination with these more detailed procedures, indicating the minimum authority required for specific procurement transactions. Its purpose is to provide an easily accessible source of information with respect to the approval process of the Company (as defined below).
3. "Award Recommendation" means the Company's internal management review and approval process of a recommended Fuel purchase.
4. "Bulk Commodities/Services" means Bulk Commodities (including, but not limited to limestone, ammonia, hydrated lime, and activated carbon) to be used by the Stations and Services (including, but not limited to laboratory services, weighing and sampling services, stockpile surveys, governmental imposition claims assessment and coal pricing information services).
5. "Chief Operating Officer" means the Company's principal officer responsible for business operations.
6. "Company" LG&E and KU Energy LLC (LKE), including, its operating and service subsidiaries Louisville Gas and Electric Company (LG&E), Kentucky Utilities Company (KU) or LG&E and KU Services Company.
7. "Contract" is an Agreement for Fuel with a term typically one year or greater.
8. "Director" means the Company's Director of Coal Supply and By-Products Marketing.
9. "Department" means the Company's Coal Supply and By-Products Marketing Department.
10. "Distressed Coal" means a limited amount of coal which may be purchased at a price below the current market price of similar quality coal.
11. "Emergency" means extraordinary conditions affecting Fuel production, transportation, or usage; including, but not limited to strikes, lockouts or other labor problems, embargoes, mining impediments, floods, river closures, extreme market conditions and other problems affecting the production or transportation of Fuel, existing and/or forecasted extreme weather conditions, or any other conditions or circumstances that can be reasonably foreseen as impairing the continued supply of Fuel to the Company.
12. "Environmental Standards" mean the legal requirements for compliance with emission levels or other environmental protection requirements applicable to one or more of the Units.
13. "Formal Solicitation" means the process of soliciting sealed bids for the supply of Fuel.



**COAL SUPPLY AND BY-PRODUCTS MARKETING PROCUREMENT PROCEDURES**  
**Louisville Gas and Electric Company**  
**Kentucky Utilities Company**

14. "Fuel" means coal, fuel oil, Transportation Services and Bulk Commodities/Services (the latter two as contemplated by Sections J and K) purchased in each case by the Coal Supply and By-Products Marketing Department for use by the Company at one of its Stations.
15. "Informal Bid" means the process of considering unsolicited or solicited oral or written bids for Fuel purchases.
16. "Joint Agreement" is any agreement that is written to supply Fuel to both LG&E and KU owned Units as contemplated in Section D.8. below.
17. "Long-Term Purchase" means any purchase of Fuel by the Company where the terms and conditions are incorporated into a Contract with a term of one year or greater.
18. "Purchase Order" is an Agreement for the supply of Fuel with a term typically less than one year.
19. "Sarbanes-Oxley" means the Sarbanes-Oxley Act of 2002 (also known as the Public Company Accounting Reform and Investor Protection Act).
20. "Spot Purchase" means any purchase of Fuel by the Company where the terms and conditions are incorporated into a Purchase Order or Contract with a term typically of less than one year.
21. "Station" means one of the Company's generating stations.
22. "Supplier" means the seller who is a party to an Agreement and is obligated to comply with the Agreement's terms.
23. "Transportation Services" means the mode(s) of moving Fuel from the point of purchase to the receiving Station, including all related costs and activities (owned/leased equipment, maintenance and repair, barge fleet and cleaning services, blending, transloading, etc.).
24. "Unit" means a generating unit at a Station.
25. "Vice President – Energy Supply and Analysis" means the Company's principal officer to whom the Director of Coal Supply and By-Products Marketing reports and who in turn reports to the Chief Operating Officer.

**B. Fuel Procurement Procedures:**

The Company's Coal Supply and By-Products Marketing Procurement Procedures define the process to obtain an adequate and reliable supply of Fuel of sufficient quality that yields the lowest possible cost of electrical energy delivered to the Unit bus bar, consistent with the Company's obligation to provide adequate and reliable service to its customers, to meet operational and Environmental Standards, and to meet any other applicable legal requirements. The Company will use its best efforts to secure its Fuel

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supply at competitive prices through the use of the Formal Solicitation, Informal Bid, and negotiation process as described in this document. The awarding of Contracts and Purchase Orders will comply with internal business controls including the Authority Limit Matrix, Sarbanes Oxley compliance and Internal Audit Services' recommendations. The Company has detailed internal control procedures covering Contract Management, Receipt of Goods and Payments (including weighing, sampling, and invoice payment), and Coal Inventory (includes Stockpile Surveys).

Implementation and oversight of the fuel procurement process is of highest priority to the Company. The Director of Coal Supply and By-Products Marketing will review the Company's Coal Supply and By-Products Marketing Procurement Procedures annually and update them as appropriate. The Department shall be organized and staffed, and procurement procedures and administration shall be conducted, in an efficient and practical manner consistent with the Company's policies. Fuel shall be purchased at competitive prices considering all material factors, including, but not limited to, quantity needed to maintain an adequate inventory, quality required to meet Unit operating characteristics and Environmental Standards, resulting bus bar energy costs, reliability of the Supplier, diversity of Suppliers, supply regions, and transportation modes, and meeting Emergency or other unusual circumstances affecting market conditions.

**C. Organization:**

1. Department Structure. The Department shall be organized and staffed to effectively administer the Company's Fuel procurement function.
2. Organizational Responsibility. The Director is responsible for the operations of the Department and reports to the Vice President – Energy Supply and Analysis who is responsible for the Power Supply and Fuel Procurement functions. The Vice President - Energy Supply and Analysis reports to the Chief Operating Officer who has the final responsibility for Fuel procurement. Other departments may be utilized by the Department to the extent the Director, Vice President – Energy Supply and Analysis, and/or Chief Operating Officer consider advisable in the execution of the functions of the Department.
3. Approval Authority (Award Recommendation). An Award Recommendation will be prepared for all Agreements for the purchase of Fuel. The Award Recommendation will be signed (at a minimum) by the Department's Coal Services Administrator, Manager Coal Supply Services, Director, General Manager(s) of the Station(s) that is (are) to receive the Fuel, and the Vice President – Power Production. Additional signatures or approvals may be required in accordance with the following Authority Limit Matrix:

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Position	Maximum Term	Maximum Tenor	Maximum Notional \$ Amount
Manager Coal Supply Services	1 year	2 years	\$10,000,000
Director, Coal Supply and By-Products Marketing –	1 year	2 years	\$10,000,000
Vice President, Energy Supply and Analysis	3 years	4 years	\$20,000,000
Chief Operating Officer	5 years	6 years	\$25,000,000
Chief Financial Officer			\$180,000,000
President			\$180,000,000
LG&E and KU Energy LLC Investment Committee; LG&E and KU Energy LLC Board			Over \$180,000,000

4. Reports. The Director will instruct the Department to prepare, maintain and distribute various reports to management and others as deemed necessary for business operations and regulatory requirements.
  
5. Records. The Department shall maintain the following records:
  - a. Open Files. The Department shall maintain within the Department's office area, the following files for at least one year or longer as the Agreement term or other conditions warrant:
    - (1) For each current Fuel Supplier, the files will contain:
      - (a) Contract documents, amendments, Purchase Orders, and escalation documentation;
      - (b) General correspondence;
      - (c) Invoices and invoice verification data;
      - (d) Delivery records and quality analyses data;
      - (e) Field inspection reports and other data.
    - (2) A record of transportation units (railroad cars, barges, etc.) owned or leased by the Company.
    - (3) A list containing current Suppliers and known potential Suppliers of Fuel.
  - b. Closed Files. The Department shall maintain its closed files in accordance with the Company's record management and retention policy.
  
6. General Administrative Duties.

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The Department shall subscribe to trade and industry publications and reports of governmental agencies concerning Fuel, Transportation Services, Bulk Commodities/Services, market information and prices. The Department shall use its best efforts to keep current on Fuel market conditions, prices and availability, and other developments relating to Fuel procurement.

**D. Fuel Supply Procedures:**

1. Projections. In conjunction with other departments of the Company, the Department shall prepare an annual projection of Fuel usage and delivered cost for each Station for the number of years required in the Company's planning process.
2. Long-Term/Spot Mix. Subject to the approvals as set forth herein, the Department shall recommend whether a Long-Term or Spot Purchase is advisable, considering the following factors: (a) the availability of adequate Fuel from qualified Suppliers, (b) the need to have an adequate inventory committed for an existing Unit, changes to an existing Unit, or a planned new Unit, (c) consistent with fuel procurement strategies, (d) the desire to maintain flexibility to market conditions and other factors affecting price and availability, (e) existing and anticipated Environmental Standards, and (f) such other factors as may reasonably affect the implementation of the Company's Coal Supply and By-Products Marketing Procurement Procedures.
3. Current Requirements. The Department shall continually review and analyze the data available to the Department in order to purchase Fuel in a timely manner to meet the requirements of the Company.
4. Supplier Qualifications. The Company shall select potential suppliers based on the current supplier list, performance on past and current Fuel Agreements, financial information, market intelligence from industry research, and general knowledge of the industry. No potential qualified supplier shall be preferred or discriminated against because of race, religion, color, sex, age or marital status of the supplier or any of its representatives.

The supplier list is periodically reviewed by the Department to eliminate any suppliers that are known to have gone out of business and to also add any new or existing suppliers that were previously not on the supplier list. The Department reviews the membership lists of several coal associations (for example the Kentucky Coal Association, the Lexington Coal Exchange, the Coal Institute, the American Coal Council, the National Mining Association, etc.) for new suppliers to add to the supplier list and also adds new suppliers based upon field inspection visits. If a supplier is identified that is not on the current supplier list, the Department will add the supplier to the list for the next RFQ. Suppliers can be added to the supplier list either by request of the supplier or by the Department.

A notice of a Request for Quotation (RFQ) is published in several Coal Industry Newsletters. The RFQ is initially sent to the suppliers on the current supplier list and posted on the Company website. If a supplier that has not received the RFQ calls and asks to be put on the Department's supplier list, they are automatically added to that list

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and a copy of the RFQ is sent to that supplier. During the evaluation of the bids, if a new supplier has submitted a bid that is competitive, a new supplier evaluation will be performed to determine the capability of the supplier.

The supplier evaluation is done to determine if a supplier has the ability to deliver the quantity and quality of coal bid at the offered price. An actual site visit may be conducted. The information requested is based upon:

- The volume and term offered by the supplier in response to the RFQ
- Past experience the Company has with the supplier
- The size and financial stability of the supplier
- Past experience the Company has with the type of coal being offered
- Previous knowledge the Company has concerning the source operation (possibly under a different source name)

The data requested may include coal reserve data such as property maps and drill logs, mining plans, listing of all production equipment, coal preparation facilities such as coal preparation plants, weighing, sampling and analysis capabilities on site, mine staffing and organization, past production records, and status of permits. In addition, financial data will be requested, and a supplier credit assessment will be performed in accordance with company policy. If all operational information, financial data, and other results from the site visit evaluation are acceptable, the supplier is approved.

5. Solicitations.

- a. Formal Solicitations. The Company shall purchase its Fuel through sealed-bid solicitations. However, the Company reserves the right to request or accept Informal Bids for Fuel purchases as described in Section 5.b., when in its judgment, market conditions or Unit conditions provide an opportunity to obtain Fuel more advantageously or more quickly than through the formal sealed-bid procedures. When the Company foregoes the Formal Solicitation process in favor of the Informal Bid procedure (Section 5.b. below), documentation shall be included in the resulting Contract or Purchase Order file describing the conditions.

A Request for Quotation ("RFQ") number will be assigned to each quotation package. The quotation must be returned to the company address as indicated on or before the due date and time, noting on the mailing label the RFQ number. The RFQ number will identify the quotation and ensure the quotation is opened according to the Coal Supply and By-Products Marketing Procurement Procedures.

The RFQ package shall contain the following minimum requirements:

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- Instructions to Suppliers on the submission of an RFQ, including time and date the bids are due, correct labeling of bid envelope, signatures required, etc.
- Scope of supply Agreement
- Listing of typical information required from Supplier
  - Quantity and quality of coal being offered
  - Bid Price
  - Length of purchase
  - Transportation capabilities
  - Mining capabilities
  - Severance Tax data
- Company terms and conditions

RFQ's shall be opened on or after the established due date and time within the presence of one or more witnesses from another department. A numbered log shall be kept for logging in the receipt of each sealed envelope. This numbered log shall be signed by the witnesses noting the bids were all sealed prior to opening and were received prior to the due date and time. Those bids received after the designated time will be returned unopened to the bidder, unless the Director waives this provision.

Upon opening the sealed envelopes, each bid shall be given the log number assigned to it and initialed by the witnesses attending the bid opening.

All candidates shall be given the same opportunity and time frame to respond to the RFQ. Information clarifications shall be shared with all candidates. A copy of the RFQ and the original of the suppliers' bid documents with evidence of the witness signatures shall be maintained within the Department.

The Department's Coal Services Administrator is responsible for entering the bid data into the bid evaluation spreadsheet. The spreadsheet contains data fields such as:

Supplier's name (from bid)

Mine name and location (from bid)

Fuel loading point, river milepost or rail loadout (from bid)

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Annual price in dollars per ton and cents/MMBtu (from bid)

Transportation cost (assigned by the Coal Services Administrator)

Severance Tax paid on the coal offered (from bid)

Calculated total delivered cost (calculated by the Coal Services Administrator)

Calculated evaluated cost (calculated total delivered cost less any severance tax paid on the coal)

Fuel technical specifications (from bid), such as:

BTU per pound

Sulfur content

Moisture content

Ash content

Chlorine content

Size

Arsenic content

Hardgrove Index

Other technical specifications as appropriate

The bids are secured in the Department area.

The Department's Manager Coal Supply Services will independently verify that all bid data is correctly entered into the bid evaluation spreadsheet.

- b. Informal Bids. When, in the Company's judgment, Fuel can be obtained more advantageously or quickly for a particular Station through the Informal Bid procedures, the Department may solicit offers or accept unsolicited offers from Suppliers by telephone, electronic mail, facsimile or otherwise. Although these bids are typically used for Spot Purchases, circumstances may arise that would justify the recommendation of a Long-Term Purchase from an Informal Bid process. The Award Recommendation for all such Informal Bid purchases shall include the Department's Fuel Sole Source Award Recommendation form with appropriate signatures.

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6. Long-Term Purchases. The Department shall review and analyze each Fuel offer. The evaluation will include, but not necessarily be limited to, the items required by the Company to satisfy operational, Environmental Standards and economic criteria. Based upon the bid evaluation spreadsheet, the Department will evaluate and rank all quotations received by total delivered cost and lowest evaluated cost. Other factors may be considered, including but not limited to, ranking reports generated by a software model that evaluates the impact of different coal qualities on Unit bus bar costs, supplier credit assessment, supplier past performance, diversity of region of supply, diversity of transportation mode, and diversity of suppliers. From this ranking, a short list of bidders may be selected from which the Department intends to conduct further discussions and/or negotiations. The short list may include unsolicited offers. The size of the short list will be determined solely at the Department's discretion. The Department may engage in preliminary negotiations with Suppliers on the short list to determine which offers warrant further consideration. The objective of the negotiations shall be to reach Agreements with Suppliers that provide the Company with favorable terms and conditions, the lowest possible cost of electrical energy delivered to the Unit bus bar and reliable supply consistent with other qualifiers related to supplier reliability, existing and future Environmental Standards, transportation options, etc. A team may be formed to conduct negotiations with bidders on the short list. Generally, this team will consist of two or more representatives from the Department. The terms and conditions outlined in the quotation submitted to the Department by the bidder shall be the basis for beginning negotiations with each potential Supplier. A representative from the Legal Department shall review documents regarding terms and conditions.

The Department may in some instances perform investigations of the bidders to determine their ability to supply Fuel under the terms and conditions outlined in their proposals. These investigations may include site visits, mine operation audits, audits of financial information, test shipments, or other similar actions intended to determine the bidder's qualification as a Supplier. The Department shall verify the adequacy of the proposed source of supply for coal quantity and quality.

The recommended Supplier(s) shall be selected by the negotiating team based upon the evaluation criteria and the results of the negotiations. The Department's Coal Services Administrator will prepare the Award Recommendation for approval as detailed in Section C.3. This recommendation will document the selection criteria and pertinent factors, and in circumstances where more than one company is selected, the recommendation shall describe the tonnage requirements and other responsibilities of each of the other recommended Suppliers.

7. Spot Purchases. Spot purchases, and resulting Purchase Orders or Contracts, may be made by the Company subject to the limit of authority stated in section C.3. In instances where there exists an opportunity to purchase Distressed Coal or other coal from an Informal Bid, the Manager Coal Supply Services may recommend the purchase of such coal to the Director without soliciting proposals through the Formal Solicitation process. The Award Recommendation for all such Fuel purchases shall include the Department's Fuel Sole Source Award Recommendation form with appropriate signatures.
8. Joint Agreements. Joint Agreements shall be made at the discretion of the Department in order to capture economic benefit from the combined purchasing power of LG&E and KU. Such discretion will be based upon the Company's operating requirements,



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Environmental Standards, inventory levels, and the ability of the Stations to burn similar fuels.

9. Documentation. Contracts and Purchase Orders shall be signed by the Supplier and the Company.

The following documents must be maintained:

- The final list of bidders
- A copy of the bid package
- The bidders' responses with witnesses' signatures
- The bid evaluation summary

**E. Agreement Administration:**

1. Compliance. The Department shall review and analyze daily business and operational reports to properly administer all Agreements. Coal weighing and sampling is conducted at each individual Station. Coal weights are measured in accordance with industry-accepted methods. Coal sampling and analysis is performed in accordance with Generation Services' System Laboratory procedures. These procedures have been developed in accordance with ASTM standards and cover coal sampling, coal sample preparation, coal sample identification, handling and shipping, and coal analysis on a parameter-by-parameter basis. Coal quantity and quality are reported to the Department through the Fuels Management System.
2. Amendments. A Contract/Purchase Order shall not be materially amended except after analysis by the Department, recommendation of the Director, review by the Legal Department and in accordance with the Authority Limit Matrix in C.3.
3. Agreement Administration. The Department shall maintain the necessary data to administer the Agreements. Every Supplier's request for a change outside the existing terms, conditions, or prices must be written and supported by adequate data in conformity with the Agreement. Each request shall be analyzed by the Department against the Agreement provisions and reported with recommendations to the Director.
4. Supplier's Relief. Any Supplier's request or claim for relief from compliance with any provision of the Agreement's terms such as Force Majeure conditions, quality specifications, approval of alternate sources, etc., must be in writing with an adequate description of conditions warranting nonperformance. Each request or claim shall be reviewed by the Director and the Company's Legal Department.
5. Inspections. The Director shall cause inspections of mining and other facilities of a Supplier as part of Agreement Administration.

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**F. Agreement Enforcement:**

1. General Enforcement Policy. Supplier obligations under Agreements shall be enforced by the Company to ensure Supplier compliance with the Company's overall procurement policy and to provide for the continuing supply of Fuel.
2. Department Responsibility. Whenever it is determined that a shipment does not meet the Agreement terms or a Fuel Supplier is not complying with the Agreement terms, the Department shall inform the Supplier and direct that subsequent shipments be in compliance.

**G. Legal Assistance:**

The Department shall have access to, and may receive legal advice from, the Legal Department on all matters relating to Fuel procurement, including Contract, Purchase Order and Agreement documentation, administration and enforcement.

**H. Fuel Inventory Levels:**

The Company has an obligation to ensure the availability of continuous reliable service to its customers. Decisions affecting Fuel inventory shall be responsive to this obligation.

The Company strives to maintain an adequate inventory to ensure service reliability while allowing for enough flexibility so inventory levels can be responsive to known and anticipated changes in conditions and minimize the risks of unforeseen conditions. Inventory ranges are established based upon forecasted Unit utilization, deliverability risks related to availability of truck, rail and barge capacity and associated transportation infrastructure, fuel quality requirements of the Units, the position of the Unit in the dispatch order, risk of market supply-demand imbalance, and the ability to conduct timely transactions. The general level of inventory is adjusted to meet anticipated conditions (i.e. summer/winter peak load, river lock outages, Unit outages, unloading system outages, etc.).

Coal inventories are monitored on a daily basis and reported monthly in the Department's Monthly Fuels Management Report which is widely distributed within the Company (including members of senior management). An annual physical inventory survey is taken and the results of the physical inventory survey are booked by the end of the year in the Fuels Management System.

**I. Emergency Procurement:**

Any one or more of the procedures described herein may be waived by the Vice President - Energy Supply and Analysis, whenever, Fuel must be purchased due to

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extraordinary conditions such as strikes, lockouts or other labor problems affecting Fuel production or transportation, embargoes, mining or other problems affecting production or transportation, existing and/or forecast extreme weather conditions, or any other conditions or circumstances that can be reasonably foreseen as impairing the continued supply of Fuel to the Company. When such a purchase is made, documentation of circumstances will be included in the Contract or Purchase Order file.

**J. Transportation Services:**

Transportation Services bids shall be requested, and Agreements negotiated whenever appropriate. A tariff may be used in lieu of an Agreement if conditions warrant. Consideration shall generally be given to the following factors when considering the need or desirability to make a Transportation Services Agreement:

- Station requirements;
- the locations of potential Fuel Suppliers;
- the most desirable transportation modes available;
- coal unloading and handling system constraints;
- existing transportation routes and transfer points between Suppliers and Stations;
- desirability of maintaining flexibility with different modes of transportation;
- economics;
- other factors which may affect the delivery of Fuel to the Stations.

The process of selecting and contracting for Transportation Services will vary with the mode of transportation being sought. For barge and truck deliveries, the Department will generally use the Company's accepted competitive bidding procedures. In instances where only one rail carrier serves a Station, direct negotiations with the rail carrier serving a particular coal source may be initiated.

The selections of a transportation Supplier will generally be based upon, but not necessarily limited to, cost, reliability, coal unloading and handling system constraints, and other factors. Transportation Service Agreements must be in writing and signed by all parties, unless provided under an approved tariff. The approval procedures set forth in Section C.3 shall be used for the approval of all Transportation Agreements.

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**K. Bulk Commodities/Services/Other Fuels:**

Bulk Commodities/Services shall be requested, and Agreements negotiated by the Department, whenever appropriate. Associated transportation services related to Section J. such as railcar leases, railcar maintenance and repair, barge maintenance and repair, barge fleeting services, coal blending, and coal transloading services shall also be requested and Agreements negotiated by the Department, whenever appropriate. All of these Bulk Commodities/Services Agreements will abide by the Approval Authority Limits as set forth in Section C.3. above.

Natural Gas. The Power Supply Department is responsible for the purchase of natural gas and associated pipeline transportation for the Stations.

Fuel Oil. Fuel oil is procured on an "as-needed" basis due to the infrequency of use and the nature of the oil market. When the need for fuel oil arises, the Department will solicit suppliers for offers. Purchases are made on the basis of lowest delivered cost and the ability to fill the order..

All documentation will be maintained pursuant to Section D.9 above.

**L. Affiliate Transactions:**

Transactions and relationships between the Company and its unregulated affiliates are governed by three governmental agencies: the Kentucky Public Service Commission, the Federal Energy Regulatory Commission, and as regards Kentucky Utilities Company, the Virginia State Corporation Commission.

The Company may purchase Fuel from an affiliate only at a price permissible under applicable affiliated restriction rules of the above regulators, if such a transfer is reasonably required by the Company to meet an Emergency and the Company believes in good faith that, under the circumstances, the transaction will be to the advantage of the Company. At the time of the affiliate transaction, the Company will document through the award recommendation process, the pricing basis and the justification for the affiliate transaction. The Company shall report any such purchase in its next recurrent report due to the Commission (Form A or Form B filing, or their successor(s)). All such affiliate transactions must as a minimum, meet the requirements of the Affiliate Transaction Overview, dated May 26, 2003, including the requirements of Kentucky Revised Statutes Chapter 278, Kentucky Public Service Commission Sections 2201 through 2219; the Federal Energy Regulatory Commission, 18 CFR 35.44; and Virginia State Corporation Commission, Code of Virginia Title 56 – Chapter 4 and any other applicable affiliate transaction rules.

**M. Ethics and Conduct:**

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The Company recognizes the importance of following the Company's Standards of Integrity to guide the conduct of the Department in the performance of its duties and responsibilities:

The Department shall endeavor to serve the best interests of the Company and its customers in the performance of the Department's duties and responsibilities.

Department staff shall adhere to the ethical standards and policies of the Company.

Each employee involved with the procurement of Fuel will be required to promptly disclose, in writing, any actual or potential conflicts of interest to their supervisor and the LG&E/KU Compliance Department.

**N. Penalties For Noncompliance:**

All Department employees are required to familiarize themselves with the Coal Supply and By-Products Marketing Procurement Procedures and acknowledge through a process established by management, that they have received, read, understand, accept, and will act in accordance with this document. Failure to comply with any term of the procedures may result in disciplinary action, up to and including discharge.

**Key Contact:** Manager - Fuels Accounting and Administration

**References:** Authority Limit Matrix, Records Management and Retention Policy, Standards of Integrity, Reliability Standards, and Affiliate Restriction Regulations

**Administrative Responsibility:** Director, Coal Supply and By-Products Marketing

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Originally issued at Louisville, Kentucky, the 10th day of February, 2003.

Revised effective January 17, 2022.

Louisville Gas and Electric Company

Kentucky Utilities Company

By 

Lonnie Bellar

Chief Operating Officer

By 

David Sinclair

Vice President – Energy Supply and Analysis



# **Power Supply Commodity Policy – Natural Gas Fuel for Generation**

Operating Policy for the Power Supply Group

Effective Date – January 1, 2020

## Signatures

### Power Supply Commodity Policy – Natural Gas Fuel for Generation

Procedure Title

**January 1, 2020**

Effective Date

### Preparer(s) Signatures

12/10/2019

X



Linn Oelker  
Manager - Market Compliance  
Signed by: Linn Oelker

12/12/2019

X

Charlie Martin

Charlie Martin  
Manager - Generation Dispatch and Trading  
Signed by: Charlie Martin

### Required Approval Signatures

12/12/2019

X

Chuck Schram

Chuck Schram  
Director - Power Supply  
Signed by: Chuck Schram

12/16/2019

X

David Sinclair

David Sinclair  
VP - Energy Supply and Analysis  
Signed by: David Sinclair

12/20/2019

X

Lonnie Bellar

Lonnie Bellar  
Chief Operating Officer  
Signed by: Bellar, Lonnie



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## Revision History

Version No. 3	Effective – January 1, 2020
Summary of Changes	
<ol style="list-style-type: none"><li>1. Updated signatories and titles to reflect organizational changes</li><li>2. Replaced IT Service Desk with Technology Support Center</li><li>3. Clarified requirements surrounding the issuance and response to an RFP to allow for email or physical correspondence.</li></ol>	
Version No. 2	Effective – August 1, 2017
Summary of Changes	
<ol style="list-style-type: none"><li>1. Moved information classification to the footer</li><li>2. Updated signatories to reflect organizational changes.</li></ol>	
Version No. 1	Effective – February 1, 2016
Summary of Changes	
<ol style="list-style-type: none"><li>1. Initial version.</li></ol>	

## Purpose

The purpose of this document is to outline a uniform standard operational policy related to commercial activity for all natural gas and natural gas related commodity transactions consummated for use as a power generation fuel by Louisville Gas and Electric Company (LG&E) or Kentucky Utilities Company (KU).

## Scope

This policy applies to all employees in the Power Supply Group (PSG) which transacts on behalf of Louisville Gas and Electric Company (LG&E) or Kentucky Utilities Company (KU) (Company).

## Definitions

The following terms and acronyms are used frequently in this document:

**Agreement** - A legally binding document fully executed by both buyer and seller in which

- 1) one party agrees to sell a Commodity and
- 2) the other agrees to
  - a) buy a Commodity or
  - b) the conditions under which a Commodity would be purchased.

**Authority Limit Matrix** - The Authority Limit Matrix (ALM) is a company policy that is to be used as a guide in combination with the more detailed policies and procedures covering specific topics. Its purpose is to provide an easily accessible source of information with respect to the approval process of LG&E and/or KU.

**Award Recommendation** - The Company's internal process for the review and approval by management of a recommended Long Term Commodity Transaction.

**Commodity(ies)** – In this document, commodities include physical natural gas and pipeline transportation, services, and storage.

**Commodity Transaction** – A unique Agreement or a confirmation under a master Agreement between a buyer and a seller involving Commodities.

**Company** - Louisville Gas and Electric Company (LG&E) or Kentucky Utilities Company (KU) or both.

**Firm** – A Commodity sale or purchase which is not Non-Firm.

**Gas Day** – As defined by the North American Energy Standards Board (NAESB), which currently begins at 09:00 Central Clock Time (CCT) and runs for 24 hours.

**Individual Contributor** – The positions within the PSG of Scheduler and Trader job family.

**Long Term Commodity Transactions** – Any Commodity Transaction that exceeds the term, tenor, or notional amount of the authority granted to the Manager – Generation Dispatch and Trading by the ALM.

**Non-Firm**– A Commodity sale or purchase for which receipt or delivery may be interrupted for any reason or no reason, without financial liability on the part of either the buyer or the seller.

**PSG Real Time Personnel** – Associate Dispatcher, Dispatcher, Senior Dispatcher, Supervisor Generation Dispatch, Associate Scheduler, Scheduler, Senior Scheduler, Associate Trader, Trader, Senior Trader, Supervisor Hourly Trading, Manager – Generation Dispatch and Trading, Director – Power Supply.

**Records Management and Retention Policy** - The policy maintained by the Company's Corporate Compliance Group that outlines managing the life cycle of all company documents (which include all official records, data and information whether paper or electronic) while effectively balancing its legal and business obligations.

**Request for Proposal (RFP)** - A process for soliciting sealed bids from suppliers of a Commodity and is typically sent in the form of a written request to industry suppliers and may be published for distribution through media outlets.

**Short Term Commodity Transaction** – Any Commodity Transaction that is within the term, tenor, or notional amount of the Manager – Generation Dispatch and Trading by the ALM.

**Training** - training of PSG employees that is (i) comparable to generally accepted practices in the energy trading industry, and (ii) commensurate and proportional in sophistication, scope and frequency to the volume of transactions and the nature and extent of the risk taken by the Company.

## **Section 1 Organization**

### **1.1 Departmental Structure**

The Power Supply Group shall be organized and staffed to effectively administer the PSG's commercial activities.

### **1.2 Organizational Responsibilities**

The Director - Power Supply is responsible for the operations of the PSG and reports directly to the Vice President, Energy Supply and Analysis who is responsible for the Energy Supply and Analysis line of business including the PSG functions. The Vice President - Energy Supply and Analysis reports directly to the Chief Operating Officer who has the final responsibility for commercial activities of the PSG. Other Departments may be utilized by the PSG to the extent the Director - Power Supply, Vice President-Energy Supply and Analysis, and Chief Operating Officer consider advisable in the execution of the functions of the group.

### **1.3 Commodity Approval Authority**

Short Term Commodity Transactions are executed by Power Supply personnel through the authority granted by the ALM.

Long Term Commodity Transaction are executed by Power Supply personnel through the authority granted by the approval of an Award Recommendation.

The execution of Commodity Transactions will comply with internal business controls including the Authority Limit Matrix, Sarbanes Oxley compliance and Internal Audit Services' recommendations. The Company has detailed internal control procedures covering Commodity Transactions, Contract Administration and Confirmations, and Credit.

## **Section 2 Reports**

The Director - Power Supply will instruct the PSG to prepare, maintain, and distribute various reports to management and others as deemed necessary for business operations and regulatory requirements.

## **Section 3 Records**

### **3.1 Commodity Accounting**

All personnel must document Short Term Commodity Transactions in the Company's commodity accounting system no later than the end of their first work period after the end of the respective Gas Day. Long Term Commodity Transactions must be accurately reflected in the commodity accounting system in time to ensure appropriate financial accounting.

### **3.2 Recording of Telephone Calls**

All Short Term Commodity Transactions must be executed on a recorded telephone line or on an electronic platform where the transaction is logged by the platform operator.

If the transaction is completed on the ICE electronic platform, a record of the transaction is electronically available to the Contract Administration department for confirmation against the Company's transaction records.

The phone recording will be maintained in accordance with the Records Management and Retention Policy. In the event the telephone recording system is out of service, personnel will promptly report the incident through the Technology Support Center.

### **3.3 Award Recommendations**

An Award Recommendation will be prepared for all Long Term Commodity Transactions. All approved Award Recommendations will be retained by the PSG in accordance with the Records Management and Retention Policy.

### **3.4 Agreements**

All executed Agreements will be sent to the Company's Contract Administration group who will be responsible for distribution within the Company and maintenance of the documents in accordance with the Records Management and Retention Policy.

Contract Administration will maintain active Agreements on site and the Agreements will be available in accordance with their departmental policies.

## **Section 4 Optimization Responsibilities**

The PSG is responsible for purchasing natural gas and natural gas transport (the Commodities governed by this policy) to fuel the Company's generation assets consistent with the Company's fuel procurement strategy that is developed in concert with coal needs. In executing these

responsibilities, the PSG shall use best efforts to keep current on market conditions, prices, availability and other developments relating to Commodities.

## **Section 5 Reserved for Future Use.**

## **Section 6 Short Term Commodity Transactions**

The Power Supply Traders are responsible for surveying the market by phone, instant messaging, electronic platforms, and any other standard industry process with the objective of obtaining the best value for the Commodities when executing Short Term Commodity Transactions. Traders will take into account prices, availability of transport, Operational Flow Orders, transport alerts and/or restrictions, as well as other market developments for a particular Commodity when determining the best value.

Power Supply Traders may only execute Short Term Commodity Transactions in real time within their authority limits as provided in the ALM.

### **6.1 Natural Gas**

Personnel may buy and sell Non-Firm natural gas. Individual Contributors may only buy or sell Firm natural gas after written approval provided by the Manager – Generation Dispatch and Trading or the Director – Power Supply.

### **6.2 Natural Gas Transport**

Personnel may buy Firm and Non-Firm natural gas transport to serve Company's generation assets. Firm transport may only be purchased after written approval of the Manager – Generation Dispatch and Trading or the Director – Power Supply.

## **Section 7 Long Term Commodity Transactions**

Power Supply personnel are responsible for surveying the market and obtaining the best value for the Commodities when recommending Long Term Commodity Transactions. Power Supply personnel will use the Award Recommendation process when recommending a Long Term Commodity Transaction to management.

## **7.1 Award Recommendation Process**

An Award Recommendation will be prepared for all Long Term Commodity Transactions. The Award Recommendation will take into account prices, availability of transport and/or storage, operational flow orders, transport alerts and/or restrictions, as well as other market developments for a particular Commodity when determining the best value. Power Supply may rely on other groups within the Company, as well as external consultants, to develop market analysis for consideration during a Request for Proposal.

A proposed Award Recommendation must be signed (at a minimum) by the Legal Department, Credit Department, Financial Reporting Department, Director – Power Supply, and the VP-Energy Supply and Analysis. Additional approvals may be necessary in accordance with the ALM.

## **7.2 Request for Proposal (RFP)**

- 7.2.1 The Generation Planning department provides projections to the PSG of the Commodities needed for the company's long term planning horizons.
- 7.2.2 The Company may select potential suppliers on the basis of past performance of past and current Agreements, market intelligence from industry research, credit analysis, and general knowledge of the industry. Potential suppliers are periodically reviewed by the PSG to eliminate any suppliers that are known to have gone out of business and to also add any new or existing suppliers that may previously have not been considered.
- 7.2.3 A notice of the RFP is sent to industry suppliers via email or physical correspondence and may be published for distribution through media outlets.
- 7.2.4 The RFP shall include at a minimum the following:
  - a. Instructions to Supplier on the submission of the response.
  - b. Response due date and time.
  - c. Scope of the commodity agreement request.
  - d. Company terms and conditions.
- 7.2.5 The RFP will be approved by the VP-Energy Supply and Analysis prior to issuance.
- 7.2.6 Responses to the RFP shall be received via email or physical correspondence.
- 7.2.7 Responses to the RFP shall be opened on or after the published due date and time and in the presence of one or more employees from outside the PSG.
- 7.2.8 Those bids received after the designated time will be returned unopened to the bidder, unless the Director - Power Supply waives this provision.



- 7.2.9 No potential qualified supplier shall be preferred or discriminated against because of race, religion, color, sex, age or marital status of the supplier or any of its representatives.

### **7.3 Sole sourcing**

- 7.3.1 A RFP process may not be appropriate for all Long Term Commodity Transactions. Sole-sourced transactions may be appropriate under any the following circumstances:
- a. The goods or services being procured are a monopoly service.
  - b. An urgent situation does not allow adequate time for a Request For Proposal.
  - c. The lack of two or more qualified bidders is documented.
  - d. Management determines and clearly documents that there is only one acceptable supplier.
- 7.3.2 A Sole Source Authorization section must be included in a proposed Award Recommendation detailing the sole-source circumstances.

## **Section 8 Transaction Agreement Enforcement**

The PSG is responsible for protecting the interests of the Company under the agreements with the counterparties. The PSG will work with other Company departments, such as the Legal Department, to enforce the Company's rights.

## **Section 9 Reliability Transactions**

Consistent with NERC Reliability Standards (EOP-002-3.1 and PER-001-0.1 R1), PSG Real Time Personnel are authorized to take any actions necessary to enter into Short Term Commodity Transactions for natural gas that exceed their limits stated in the ALM if, and only if, such actions are necessary to maintain system reliability. Maintaining system reliability may be due to request from the Transmission Operator, Balancing Authority, or Reliability Coordinator, or required to meet NERC standards or that absent such actions, one could reasonably expect the Company would declare an Energy Emergency Alert (EEA). Any such Short Term Commodity Transaction entered into on this basis must be reported in writing to the Director – Power Supply and the Vice President – Energy Supply and Analysis within twelve (12) hours of the transaction with a detailed explanation as to the nature of the reliability issue and why it was not possible to enter into transactions in compliance with the ALM.

## Section 10 Ethics and Conduct

The Company recognizes the importance of following the Company's Standards of Integrity to guide the conduct of the PSG in the performance of its duties and responsibilities.

The group shall endeavor to serve the best interests of the Company and its customers in the performance of the group's duties and responsibilities. PSG personnel shall adhere to the ethical standards and policies of the Company.

## Section 11 Affiliate Transactions

Transactions and relationships between the Company and its unregulated affiliates are governed by four governmental agencies: the Kentucky Public Service Commission, the Federal Energy Regulatory Commission, the Securities and Exchange Commission, and as regards Kentucky Utilities Company, the Virginia State Corporation Commission.

Power Supply personnel may only execute transactions with affiliates in accordance with the applicable affiliate restriction regulations.

## Section 12 Training

Each PSG employee is expected to be familiar with all Company policies and procedures that are relevant to the PSG employee's activities, as well as the practices and protocols implemented by providers of natural gas and the pipeline entities transporting natural gas. Training for Individual Contributors includes initial supervised Training prior to independently conducting trading activities, as well as initial and refresher Training on certain regulatory and corporate policy issues. Training will be conducted by PSG employees and by the Company's Corporate Compliance Group.

### **Individual Responsibilities; Penalties For Noncompliance**

All Power Supply employees are required to familiarize themselves with this Power Supply Commodity Policy – Natural Gas Fuel for Generation and acknowledge through a process established by management, that they have received, read, understood, accepted, and will act in accordance with this document. Failure to comply with any term of this policy may result in disciplinary action, up to and including discharge.

**Key Contacts:**           Manager - Market Compliance

**References:** Authority Limit Matrix, Records Management and Retention Policy, Standards of Integrity-PPL, NERC Reliability Standards.

**Administrative Responsibility:** Director – Power Supply

**LOUISVILLE GAS AND ELECTRIC COMPANY**

**Response to Commission Staff's First Request for Information  
Dated September 6, 2023**

**Case No. 2023-00011**

**Question No. 12**

**Responding Witness: Stuart A. Wilson**

Q-12. For the last six months of the period under review and for the years 2021 and 2022, list all firm power commitments for LG&E for (a) purchases and (b) sales. This list shall identify the electric utility, the amount of commitment in MW, and the purpose of the commitment (i.e., peaking, emergency).

A-12.

a. Firm Purchases

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

<u>Utility</u>	<u>Period</u>	<u>Companies' Amt (MW)</u>	<u>LG&amp;E Portion (MW)</u>	<u>Purpose</u>
OVEC	May 2022	~ 82	~ 57	Baseload
OVEC	Jun 2022	~ 136	~ 94	Baseload
OVEC	Jul 2022	~ 152	~ 105	Baseload
OVEC	Aug 2022	~ 152	~ 105	Baseload
OVEC	Sep 2022	~ 114	~ 79	Baseload
OVEC	Oct 2022	~ 124	~ 86	Baseload
OVEC	2021	~ 92-158	~ 63-109	Baseload
OVEC	2022	~ 82-158	~ 57-109	Baseload

b. Firm Sales:

None.

**LOUISVILLE GAS AND ELECTRIC COMPANY**

**Response to Commission Staff's First Request for Information  
Dated September 6, 2023**

**Case No. 2023-00011**

**Question No. 13**

**Responding Witness: Andrea M. Fackler**

- Q-13. Provide a monthly billing summary of sales to all electric utilities for the last six months of the period under review.
- A-13. See attached.



Louisville Gas and Electric Company

Power Transaction Schedule

Month Ended May 31, 2022

Company	Type of Transaction	KWH	Billing Components			Total Charges(\$)
			Demand(\$)	Fuel Charges(\$)	Other Charges(\$)	
<b>Sales</b>						
ETCENDURE	ETC	Economy	77,000	\$ 2,593.28	\$ 4,412.33	\$ 7,005.61
CONSTELLATION ENERGY GENERATION, LLC	CONSTGEN	Economy	401,000	\$ 12,539.95	\$ 21,193.43	\$ 33,733.38
INDIANA MUNICIPAL POWER AGENCY	IMPA	Economy	1,000	\$ 13.53	\$ 33.40	\$ 46.93
ENERGY IMBALANCE	IMBL	Economy	253,000	\$ 5,812.42	\$ 9,816.44	\$ 15,628.86
MACQUARIECOOK	MACQUARIE	Economy	521,000	\$ 26,300.45	\$ 44,748.76	\$ 71,049.21
MIDCONTINENT INDEPENDENT SYSTEM OPERATOR, INC.	MISO	Economy	31,754,000	\$ 872,496.73	\$ 1,484,505.92	\$ 2,357,002.65
PJM INTERCONNECTION ASSOCIATION	PJM	Economy	11,898,000	\$ 345,289.20	\$ 587,490.87	\$ 932,780.07
RAINBOW ENERGY MARKETING CORP	REMC	Economy	276,000	\$ 8,894.36	\$ 15,133.28	\$ 24,027.64
THE ENERGY AUTHORITY	TEA	Economy	4,000	\$ 94.45	\$ 160.70	\$ 255.15
TENNESSEE VALLEY AUTHORITY	TVA	Economy	1,319,000	\$ 63,330.19	\$ 107,752.90	\$ 171,083.09
KENTUCKY UTILITIES COMPANY	KU	Economy	33,132,000	\$ 982,832.67	\$ 17,713.25	\$ 1,000,545.92
<b>Total Sales</b>			<b>79,636,000</b>	<b>\$ -</b>	<b>\$ 2,320,197.23</b>	<b>\$ 2,292,961.28</b>
						<b>\$ 4,613,158.51</b>



Louisville Gas and Electric Company

Power Transaction Schedule

Month Ended June 30, 2022

<u>Company</u>	Type of Transaction	KWH	Billing Components			Total Charges(\$)
			Demand(\$)	Fuel Charges(\$)	Other Charges(\$)	
<b>Sales</b>						
INDIANA MUNICIPAL POWER AGENCY	IMPA	Economy	1,000	\$ 55.05	\$ 24.06	\$ 79.11
ENERGY IMBALANCE	IMBL	Economy	253,000	\$ 15,023.69	\$ 6,433.19	\$ 21,456.88
MACQUARIECOOK	MACQUARIE	Economy	-	\$ 0.01	\$ (0.01)	\$ -
MIDCONTINENT INDEPENDENT SYSTEM OPERATOR, INC.	MISO	Economy	22,000	\$ 1,697.76	\$ 452.44	\$ 2,150.20
PJM INTERCONNECTION ASSOCIATION	PJM	Economy	11,000	\$ 1,120.77	\$ 486.55	\$ 1,607.32
THE ENERGY AUTHORITY	TEA	Economy	89,000	\$ 6,232.46	\$ 2,723.61	\$ 8,956.07
KENTUCKY UTILITIES COMPANY	KU	Economy	52,396,000	\$ 1,968,146.45	\$ 894.82	\$ 1,969,041.27
<b>Total Sales</b>			<b>52,772,000</b>	<b>\$ -</b>	<b>\$ 1,992,276.19</b>	<b>\$ 11,014.66</b>
						<b>\$ 2,003,290.85</b>



Louisville Gas and Electric Company

Power Transaction Schedule

Month Ended July 31, 2022

Company	Type of Transaction	KWH	Billing Components			Total Charges(\$)
			Demand(\$)	Fuel Charges(\$)	Other Charges(\$)	
<b>Sales</b>						
EVERGY KANSAS CENTRAL, INC.	EVGY	Economy	25,000	\$ 1,094.01	\$ 2,130.06	\$ 3,224.07
CONSTELLATION ENERGY GENERATION, LLC	CONSTGEN	Economy	191,000	\$ 7,781.44	\$ 15,150.62	\$ 22,932.06
INDIANA MUNICIPAL POWER AGENCY	IMPA	Economy	3,000	\$ 73.73	\$ 166.84	\$ 240.57
ENERGY IMBALANCE	IMBL	Economy	51,000	\$ 1,421.96	\$ 2,333.33	\$ 3,755.29
MACQUARIECOOK	MACQUARIE	Economy	34,000	\$ 1,500.62	\$ 2,921.73	\$ 4,422.35
MIDCONTINENT INDEPENDENT SYSTEM OPERATOR, INC.	MISO	Economy	175,000	\$ 6,696.61	\$ 13,038.42	\$ 19,735.03
PJM INTERCONNECTION ASSOCIATION	PJM	Economy	271,000	\$ 10,282.76	\$ 20,020.74	\$ 30,303.50
RAINBOW ENERGY MARKETING CORP	REMC	Economy	12,000	\$ 441.15	\$ 858.92	\$ 1,300.07
THE ENERGY AUTHORITY	TEA	Economy	18,000	\$ 531.06	\$ 1,033.98	\$ 1,565.04
KENTUCKY UTILITIES COMPANY	KU	Economy	13,770,000	\$ 372,491.63	\$ 384,103.06	\$ 756,594.69
<b>Total Sales</b>			<b>14,550,000</b>	<b>\$ -</b>	<b>\$ 402,314.97</b>	<b>\$ 441,757.70</b>
						<b>\$ 844,072.67</b>



Louisville Gas and Electric Company

Power Transaction Schedule

Month Ended August 31, 2022

Company	Type of Transaction	KWH	Billing Components			Total Charges(\$)
			Demand(\$)	Fuel Charges(\$)	Other Charges(\$)	
<b>Sales</b>						
ALTOP ENERGY TRADING LLC	ALTOP	Economy	7,000	\$ 177.21	\$ 703.24	\$ 880.45
CONSTELLATION ENERGY GENERATION, LLC	CONSTGEN	Economy	48,000	\$ 1,361.07	\$ 5,401.47	\$ 6,762.54
DYNASTY POWER, INC.	DYNASTYPWR	Economy	133,000	\$ 4,659.71	\$ 18,492.34	\$ 23,152.05
EVERGY KANSAS CENTRAL, INC.	EVGY	Economy	7,000	\$ 204.75	\$ 812.54	\$ 1,017.29
INDIANA MUNICIPAL POWER AGENCY	IMPA	Economy	10,000	\$ 232.19	\$ 921.46	\$ 1,153.65
ENERGY IMBALANCE	IMBL	Economy	89,000	\$ 1,678.68	\$ 6,401.97	\$ 8,080.65
MACQUARIECOOK	MACQUARIE	Economy	344,000	\$ 9,587.08	\$ 38,046.95	\$ 47,634.03
MIDCONTINENT INDEPENDENT SYSTEM OPERATOR, INC.	MISO	Economy	687,000	\$ 18,402.69	\$ 73,032.29	\$ 91,434.98
PJM INTERCONNECTION ASSOCIATION	PJM	Economy	1,037,000	\$ 29,583.63	\$ 117,404.58	\$ 146,988.21
RAINBOW ENERGY MARKETING CORP	REMC	Economy	7,000	\$ 170.32	\$ 675.92	\$ 846.24
THE ENERGY AUTHORITY	TEA	Economy	6,000	\$ 121.75	\$ 472.86	\$ 594.61
TENNESSEE VALLEY AUTHORITY	TVA	Economy	134,000	\$ 4,013.46	\$ 15,927.69	\$ 19,941.15
KENTUCKY UTILITIES COMPANY	KU	Economy	27,136,000	\$ 644,901.73	\$ 859,923.93	\$ 1,504,825.66
<b>Total Sales</b>			<b>29,645,000</b>	<b>\$ -</b>	<b>\$ 715,094.27</b>	<b>\$ 1,138,217.24</b>
						<b>\$ 1,853,311.51</b>





Louisville Gas and Electric Company

Power Transaction Schedule

Month Ended September 30, 2022

Company	Type of Transaction	KWH	Billing Components			Total Charges(\$)
			Demand(\$)	Fuel Charges(\$)	Other Charges(\$)	
<b>Sales</b>						
ENERGY IMBALANCE	IMBL	Economy	112,000	\$ 2,502.53	\$ 8,300.98	\$ 10,803.51
MACQUARIECOOK	MACQUARIE	Economy	411,000	\$ 10,349.48	\$ 35,506.83	\$ 45,856.31
MIDCONTINENT INDEPENDENT SYSTEM OPERATOR, INC.	MISO	Economy	1,424,000	\$ 36,093.57	\$ 123,962.03	\$ 160,055.60
PJM INTERCONNECTION ASSOCIATION	PJM	Economy	933,000	\$ 24,676.14	\$ 84,701.65	\$ 109,377.79
THE ENERGY AUTHORITY	TEA	Economy	1,000	\$ 22.72	\$ 89.17	\$ 111.89
KENTUCKY UTILITIES COMPANY	KU	Economy	18,796,000	\$ 471,238.29	\$ 423,449.66	\$ 894,687.95
<b>Total Sales</b>			<b>21,677,000</b>	<b>\$ -</b>	<b>\$ 544,882.73</b>	<b>\$ 676,010.32</b>
						<b>\$ 1,220,893.05</b>



Louisville Gas and Electric Company

Power Transaction Schedule

Month Ended October 31, 2022

Company	Type of Transaction	KWH	Billing Components			Total Charges(\$)
			Demand(\$)	Fuel Charges(\$)	Other Charges(\$)	
<b>Sales</b>						
ALTOP ENERGY TRADING LLC	ALTOP	Economy	19,000	\$ 568.55	\$ 992.21	\$ 1,560.76
EVERGY KANSAS CENTRAL, INC.	EVGY	Economy	27,000	\$ 814.94	\$ 1,422.18	\$ 2,237.12
ENERGY IMBALANCE	IMBL	Economy	56,000	\$ 798.28	\$ 1,207.66	\$ 2,005.94
MACQUARIECOOK	MACQUARIE	Economy	11,000	\$ 233.33	\$ 407.19	\$ 640.52
MIDCONTINENT INDEPENDENT SYSTEM OPERATOR, INC.	MISO	Economy	398,000	\$ 12,408.87	\$ 21,655.41	\$ 34,064.28
PJM INTERCONNECTION ASSOCIATION	PJM	Economy	313,000	\$ 8,697.38	\$ 15,178.24	\$ 23,875.62
RAINBOW ENERGY MARKETING CORP	REMC	Economy	122,000	\$ 3,693.22	\$ 6,445.23	\$ 10,138.45
THE ENERGY AUTHORITY	TEA	Economy	1,000	\$ 10.49	\$ 28.87	\$ 39.36
TENNESSEE VALLEY AUTHORITY	TVA	Economy	81,000	\$ 1,378.75	\$ 2,406.13	\$ 3,784.88
KENTUCKY UTILITIES COMPANY	KU	Economy	23,290,000	\$ 597,108.13	\$ 5,355.52	\$ 602,463.65
<b>Total Sales</b>			<b>24,318,000</b>	<b>\$ -</b>	<b>\$ 625,711.94</b>	<b>\$ 55,098.64</b>
						<b>\$ 680,810.58</b>

**LOUISVILLE GAS AND ELECTRIC COMPANY**

**Response to Commission Staff's First Request for Information  
Dated September 6, 2023**

**Case No. 2023-00011**

**Question No. 14**

**Responding Witness: Michael P. Drake**

Q-14. Provide a list, in chronological order, showing by unit any scheduled, actual, and forced outages for the last six months of the period under review. Provide a key for any information that is abbreviated.

A-14. See attached.

Louisville Gas & Electric Company  
May 2022 through October 2022

Unit and Outage Type (F=Forced; S=Scheduled)		Scheduled		Actual*		HOURS OF DURATION		REASON FOR DEVIATION FROM SCHEDULED MAINTENANCE
		FROM	TO	FROM	TO	Scheduled	Actual*	OR REASON FOR FORCED OUTAGE AS APPROPRIATE
Mill Creek Unit 1 - Coal - 300 MW In-service August 1972	S	4/30/2022 0:00	5/22/2022 0:00	4/29/2022 12:17	5/17/2022 19:13	528:00	438:56	FGD Absorber Module Floor Repair
	F			10/7/2022 9:15	10/8/2022 20:40		35:25	Turbine Lube Oil System
	S	10/8/2022 20:40	10/10/2022 6:28	10/8/2022 20:40	10/10/2022 6:28	33:48	33:48	Turbine Lube Oil System
Mill Creek Unit 2 - Coal - 295 MW In-service July 1974	S	4/30/2022 0:00	5/29/2022 0:00	4/28/2022 23:02	5/27/2022 5:49	696:00	678:47	FGD Absorber Module Floor Repair
	F			5/27/2022 5:49	6/5/2022 3:30		213:41	Circulating Water System Outage
	F			8/2/2022 21:41	8/3/2022 10:38		12:57	Control system
Mill Creek Unit 3 - Coal - 394 MW In-service August 1978	S	9/17/2022 0:00	10/2/2022 0:00	9/17/2022 0:58	10/2/2022 5:45	360:00	364:47	Boiler Maintenance Outage
Mill Creek Unit 4 - Coal - 486 MW In-service September 1982	S	9/24/2022 0:00	11/27/2022 0:00	9/23/2022 0:37	11/28/2022 0:01	1536:00	1583:24	Major Turbine Overhaul
Trimble County Unit 1 - Coal - 370 MW In-service December 1990 75% ownership share of 511 MW	F			7/24/2022 1:30	7/26/2022 21:29		67:59	Bottom Ash Conveyors
	S	10/8/2022 0:00	10/23/2022 0:00	10/8/2022 2:05	10/22/2022 2:19	360:00	336:14	Boiler Maintenance Outage
	F			10/22/2022 2:19	10/22/2022 13:06		10:47	Turbine EHC System
Trimble County Unit 2 - Coal - 570 MW In-service January 2011 75% ownership share of 732 MW jointly owned with KU	S	8/20/2022 1:38	8/22/2022 16:51	8/20/2022 1:38	8/22/2022 16:51	63:13	63:13	Boiler waterwall tube leak repair
	F			10/20/2022 22:46	10/23/2022 20:20		69:34	Boiler waterwall tube leak repair
Cane Run Unit 7 - Gas - 683 MW In-service June 2015 Jointly owned with KU	S	4/9/2022 0:00	5/1/2022 0:00	4/8/2022 22:32	5/1/2022 13:47	528:00	543:15	Generator Scheduled Inspections
	S	5/6/2022 23:44	5/7/2022 12:01	5/6/2022 23:44	5/7/2022 12:01	12:17	12:17	Boiler feedwater pump/turbine lube oil system
	S	5/7/2022 12:01	5/8/2022 5:20	5/7/2022 12:01	5/8/2022 5:20	17:19	17:19	Boiler feedwater pump/turbine lube oil system
	S	5/24/2022 15:38	5/31/2022 5:30	5/24/2022 15:38	5/31/2022 5:30	157:52	157:52	Hot Reheat Steam Leak
	F			5/31/2022 5:30	6/1/2022 7:40		26:10	Turbine/Generator Repair
	S	6/2/2022 6:00	6/8/2022 21:07	6/2/2022 6:00	6/8/2022 21:07	159:07	159:07	HRSB Drain Line Leak Repair
	S	6/23/2022 21:37	7/2/2022 10:17	6/23/2022 21:37	7/2/2022 10:17	204:40	204:40	Turbine/Generator repair
E. W. Brown Unit 5 - Gas CT - 130 MW In-service June 2001 Jointly owned with KU	F			7/11/2022 17:01	7/13/2022 12:52		43:51	Generator protection relay equipment failure
	S	8/2/2022 7:36	8/2/2022 14:36	8/2/2022 7:36	8/2/2022 14:36	7:00	7:00	Starting system
E. W. Brown Unit 6 - Gas CT - 171 MW In-service August 1999 Jointly owned with KU	S	5/23/2022 6:50	5/26/2022 11:14	5/23/2022 6:50	5/26/2022 11:14	76:24	76:24	Circuit Breaker - Testing and Inspection
	S	8/11/2022 6:40	8/11/2022 14:35	8/11/2022 6:40	8/11/2022 14:35	7:55	7:55	Gas fuel system instrument calibration
E. W. Brown Unit 7 - Gas CT - 171 MW In-service August 1999 Jointly owned with KU	S	5/26/2022 11:15	5/27/2022 16:37	5/26/2022 11:15	5/27/2022 16:37	29:22	29:22	Circuit Breaker - Testing and Inspection
	S	8/17/2022 7:07	8/17/2022 13:29	8/17/2022 7:07	8/17/2022 13:29	6:22	6:22	Fuel Gas System - Flow Meter Calibration
	F			10/18/2022 6:00	10/21/2022 11:58		77:58	Exciter controls
Cane Run Unit 11 - Gas CT - 14 MW In-service June 1968		No outages > or = 6 hours						
Paddys Run Unit 11 - Gas CT - 13 MW In-service June 1968		No outages > or = 6 hours						
Paddys Run Unit 12 - Gas CT - 28 MW In-service July 1968		No outages > or = 6 hours						
Paddys Run Unit 13 - Gas CT - 175 MW In-service June 2001 Jointly owned with KU	S	10/29/2022 0:00	11/6/2022 0:00	10/29/2022 5:01	11/5/2022 10:09	192:00	173:08	Generator and gas path inspection

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

<b>Trimble County Unit 5 - Gas CT - 179 MW</b> In-service May 2002 Jointly owned with KU	S	5/24/2022 2:30	5/25/2022 18:35	5/24/2022 2:30	5/25/2022 18:35	40:05	40:05	Hydraulic pump maintenance
	S	6/10/2022 5:15	6/10/2022 14:25	6/10/2022 5:15	6/10/2022 14:25	9:10	9:10	Inlet air filters
	S	9/13/2022 6:00	9/16/2022 7:20	9/13/2022 6:00	9/16/2022 7:20	73:20	73:20	Turbine Vibration - Balance Weight Installation
<b>Trimble County Unit 6 - Gas CT - 179 MW</b> In-service May 2002 Jointly owned with KU	S	10/5/2022 3:00	10/5/2022 14:47	10/5/2022 3:00	10/5/2022 14:47	11:47	11:47	Compressor washing
<b>Trimble County Unit 7 - Gas CT - 179 MW</b> In-service June 2004 Jointly owned with KU	S	9/29/2022 6:02	9/29/2022 12:39	9/29/2022 6:02	9/29/2022 12:39	6:37	6:37	Compressor washing
	S	10/1/2022 0:00	10/16/2022 0:00	10/1/2022 0:01	10/17/2022 0:00	360:00	383:59	Gas turbine inlet filter replacement
	S	10/17/2022 0:00	11/12/2022 15:15	10/17/2022 0:00	11/12/2022 15:15	639:15	639:15	Combustion Turbine Blade Repair
<b>Trimble County Unit 8 - Gas CT - 179 MW</b> In-service June 2004 Jointly owned with KU	S	10/1/2022 0:00	10/16/2022 0:00	9/30/2022 6:02	10/17/2022 0:00	360:00	401:58	Gas turbine inlet filter replacement
	S	10/17/2022 0:00	10/25/2022 7:01	10/17/2022 0:00	10/25/2022 7:01	199:01	199:01	Combustion Turbine Blade Repair
<b>Trimble County Unit 9 - Gas CT - 179 MW</b> In-service July 2004 Jointly owned with KU	S	4/30/2022 0:00	5/8/2022 0:00	4/30/2022 0:01	5/8/2022 8:06	192:00	200:05	Borecope inspection
	F			6/18/2022 21:56	6/19/2022 5:29		7:33	Instrumentation - IO Card Replacement
	S	7/12/2022 0:00	7/12/2022 6:31	7/12/2022 0:00	7/12/2022 6:31	6:31	6:31	Compressor Bleed Valves
	S	8/12/2022 1:00	8/12/2022 12:23	8/12/2022 1:00	8/12/2022 12:23	11:23	11:23	Fuel Gas System
	S	9/12/2022 5:56	9/12/2022 14:15	9/12/2022 5:56	9/12/2022 14:15	8:19	8:19	Compressor washing
<b>Trimble County Unit 10 - Gas CT - 179 MW</b> In-service July 2004 Jointly owned with KU	S	4/30/2022 0:00	5/8/2022 0:00	4/29/2022 13:30	5/8/2022 6:41	192:00	209:11	Borecope inspection
	S	7/29/2022 2:00	7/29/2022 17:30	7/29/2022 2:00	7/29/2022 17:30	15:30	15:30	Ignition system
	S	8/12/2022 1:00	8/12/2022 12:23	8/12/2022 1:00	8/12/2022 12:23	11:23	11:23	Fuel Gas System
	S	9/14/2022 5:12	9/14/2022 13:47	9/14/2022 5:12	9/14/2022 13:47	8:35	8:35	Compressor washing

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

**LOUISVILLE GAS AND ELECTRIC COMPANY**

**Response to Commission Staff’s First Request for Information**

**Dated September 6, 2023**

**Case No. 2023-00011**

**Question No. 15**

**Responding Witness: Michael P. Drake**

Q-15. For the last six months of the period under review, provide the monthly capacity factor at which each generating unit operated.

A-15. The information requested from May 2022 to October 2022 is shown in the table below.

LGE	Capacity Factor(%) (Net MWh)/(period hours x MW ratings)					
	May-22	Jun-22	Jul-22	Aug-22	Sep-22	Oct-22
Brown 5	16.2	45.5	32.0	22.0	16.1	17.3
Brown 6	2.1	4.1	3.9	6.4	0.5	1.3
Brown 7	6.7	40.1	21.7	1.5	1.6	5.0
Brown Solar	23.4	28.4	22.5	23.7	22.4	20.3
Cane Run 7	31.4	20.2	89.1	80.4	79.3	94.6
Mill Creek 1	29.0	31.8	7.4	0.0	0.0	48.1
Mill Creek 2	0.0	42.3	72.4	85.7	79.5	49.7
Mill Creek 3	75.1	63.1	69.3	72.7	34.8	72.8
Mill Creek 4	76.1	66.7	69.6	72.8	51.1	0.0
Ohio Falls 1	22.6	33.3	19.0	49.0	24.0	8.1
Ohio Falls 2	28.8	51.1	24.6	44.3	30.5	10.7
Ohio Falls 3	27.9	40.0	38.8	25.9	37.4	11.8
Ohio Falls 4	30.6	50.0	41.2	26.6	41.0	19.2
Ohio Falls 5	31.0	56.0	47.7	45.1	29.6	40.7
Ohio Falls 6	34.8	57.4	59.0	52.6	47.6	45.5
Ohio Falls 7	40.1	63.1	54.8	63.3	58.3	9.4
Ohio Falls 8	36.3	67.3	64.0	53.2	18.7	55.9
Paddys Run 12	0.0	0.0	0.0	0.1	0.0	0.0
Paddys Run 13	6.2	31.2	5.6	4.5	2.3	3.3
Trimble County 1	89.9	86.4	77.2	88.1	87.1	41.2
Trimble County 2	93.8	77.4	80.9	75.2	81.4	78.9
Trimble County 5	17.6	64.0	39.6	20.3	2.9	5.4
Trimble County 6	11.9	42.0	18.7	6.8	6.5	19.5
Trimble County 7	27.7	78.5	47.3	39.9	12.4	0.0
Trimble County 8	3.4	47.4	28.4	17.0	17.0	1.3
Trimble County 9	17.3	70.3	44.7	32.5	6.1	7.9
Trimble County 10	23.9	79.4	49.6	48.3	18.1	1.0

Notes:

1 – Trimble County values reflect 100% of the unit. Trimble County 1 is owned by LG&E (75%), IMPA (12.88%), and IMEA (12.12%). Trimble County 2 is owned by KU (60.75%), LG&E (14.25%), IMPA (12.88%), and IMEA (12.12%).

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

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

**LOUISVILLE GAS AND ELECTRIC COMPANY**

**Response to Commission Staff's First Request for Information  
Dated September 6, 2023**

**Case No. 2023-00011**

**Question No. 16**

**Responding Witness: Michael P. Drake**

Q-16.

- a. For the last six months of the period under review, explain whether LG&E made any changes to its maintenance and operation practices or completed any specific generation efficiency improvements that affect fuel usage at LG&E's generation facilities.
- b. Describe the impact of these changes on LG&E's fuel usage.

A-16.

a-b. There have been no maintenance or operation practice changes that affect fuel usage during the period under review. LG&E strives to maintain unit efficiency through routine cyclic planned outage maintenance and performance monitoring. This maintenance work is focused on reestablishing expected turbine and equipment efficiency. This is verified through monitoring of all plant systems during operation and periodic equipment testing. LG&E utilizes multiple software and analytical tools in this process. In evaluating potential major component projects or replacements that may impact efficiency, LG&E must balance any potential efficiency benefit associated with the project against both costs and potential implications under the Clean Air Act. LG&E has not realized any efficiency improvements through major component projects during this period.



**LOUISVILLE GAS AND ELECTRIC COMPANY**

**Response to Commission Staff's First Request for Information  
Dated September 6, 2023**

**Case No. 2023-00011**

**Question No. 17**

**Responding Witness: Michael P. Drake**

Q-17. For the last six months of the period under review provide the hour by hour availability of each generating unit availability, whether the unit was operating, and if operating the minimum (economic or operational) and maximum capacity of the unit.

A-17. See attachment provided in Excel format.

Attachment  
provided in  
separate  
Excel file

**LOUISVILLE GAS AND ELECTRIC COMPANY**

**Response to Commission Staff's First Request for Information  
Dated September 6, 2023**

**Case No. 2023-00011**

**Question No. 18**

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

- Q-18. State whether LG&E is aware of any violations of its policies and procedures regarding fuel procurement that occurred prior to or during the last six months of the period under review.
- A-18. The Company is not aware of any violations of its policies and procedures regarding fuel procurement that occurred prior to or during the period under review.

**LOUISVILLE GAS AND ELECTRIC COMPANY**

**Response to Commission Staff's First Request for Information  
Dated September 6, 2023**

**Case No. 2023-00011**

**Question No. 19**

**Responding Witness: Andrea M. Fackler**

- Q-19. State whether LG&E is aware of any violations of 807 KAR 5:056 that occurred prior to or during the last six months of the period under review.
- A-19. The Company is not aware of any violations of 807 KAR 5:056 that occurred prior to or during the period under review.

**LOUISVILLE GAS AND ELECTRIC COMPANY**

**Response to Commission Staff's First Request for Information  
Dated September 6, 2023**

**Case No. 2023-00011**

**Question No. 20**

**Responding Witness: Andrea M. Fackler**

- Q-20. Describe the effect on the FAC calculation of line losses related to:
- a. Intersystem sales when using a third-party transmission system; and
  - b. Intersystem sales when not using a third-party transmission system.
- A-20.
- a-b. Line losses related to inter-system sales are calculated using a loss factor of 0.5% whether the inter-system sale requires a third-party transmission system or not. This practice is consistent with the Commission's June 7, 2013, Amended Order in Case No. 2012-00552.

**LOUISVILLE GAS AND ELECTRIC COMPANY**

**Response to Commission Staff's First Request for Information  
Dated September 6, 2023**

**Case No. 2023-00011**

**Question No. 21**

**Responding Witness: Andrea M. Fackler**

- Q-21. State whether all fuel contracts related to commodity and transportation have been filed with the Commission. If any contracts have not been filed, explain why they have not been filed, and provide a copy.
- A-21. For the period under review, all fuel contracts related to commodity and/or transportation have been filed with the Commission.

**LOUISVILLE GAS AND ELECTRIC COMPANY**

**Response to Commission Staff's First Request for Information  
Dated September 6, 2023**

**Case No. 2023-00011**

**Question No. 22**

**Responding Witness: Delbert Billiter**

- Q-22. For each generating station, state the methods of coal delivery currently available.
- A-22. Mill Creek – Rail and Barge  
Trimble County – Barge

**LOUISVILLE GAS AND ELECTRIC COMPANY**

**Response to Commission Staff's First Request for Information  
Dated September 6, 2023**

**Case No. 2023-00011**

**Question No. 23**

**Responding Witness: Andrea M. Fackler**

- Q-23. If a change in the base fuel cost is proposed, state the month to be used as the base period (b). If the base period results in a fuel cost other than one representative of current costs as prescribed by 807 KAR 5:056, Section 1(2), explain why this base period was selected. If no change is proposed, include an explanation of the reason(s) LG&E believes the current base period fuel cost should remain unchanged.
- A-23. The Company is recommending a change in its base fuel cost in this proceeding and recommends that the per unit cost for the January 2022 expense month be used as the base period. See the Direct Testimony of Andrea M. Fackler for further discussion of the proposed fuel base rate and the selection of the base period.



**LOUISVILLE GAS AND ELECTRIC COMPANY**

**Response to Commission Staff's First Request for Information  
Dated September 6, 2023**

**Case No. 2023-00011**

**Question No. 24**

**Responding Witness: Andrea M. Fackler**

- Q-24. Provide a calculation of the fossil fuel costs F(b) that LG&E proposes to use to calculate the base period fuel cost. This calculation shall show each component of F(b) as defined by 807 KAR 5:056. Explain why the fuel cost in the selected base period is representative of the level of fuel cost currently being experienced by LG&E.
- A-24. Attached is a copy of the Fuel Cost Schedule (Form A, Page 2) for the expense period of January 2022, which shows the components of the proposed F(b) as defined by 807 KAR 5:056. The Company considered F(b) and S(b) collectively in determining the appropriate month to use as a new fuel base rate since together they produce the monthly FAC per unit cost. See also the Direct Testimony of Andrea M. Fackler for further discussion of the proposed fuel base rate and the selection of the base period.

**LOUISVILLE GAS AND ELECTRIC COMPANY  
FUEL COST SCHEDULE**

Expense Month: January 2022

<u>(A) Company Generation</u>		
Coal Burned	(+) \$	18,080,995 (1)
Oil Burned	(+)	-
Gas Burned	(+)	11,265,376 (1)
Fuel (assigned cost during Forced Outage)	(+)	-
Fuel (substitute cost for Forced Outage)	(-)	-
SUB-TOTAL		<u>\$ 29,346,371</u>
<u>(B) Purchases</u>		
Net energy cost - economy purchases	(+) \$	1,915,567
Identifiable fuel cost - other purchases	(+)	-
Identifiable fuel cost (substitute for Forced Outage)	(-)	-
Less Purchases Above Highest Cost Units	(-)	-
Internal Economy	(+)	154,959
Internal Replacement	(+)	707,681
SUB-TOTAL		<u>\$ 2,778,207</u>
<u>(C) Inter-System Sales</u>		
Including Interchange-out	(+) \$	1,249,618
Internal Economy	(+)	2,291,439
Internal Replacement	(+)	17,055
Dollars Assigned to Inter-System Sales Losses	(+)	6,248
SUB-TOTAL		<u>\$ 3,564,360</u>
<u>(D) Over or (Under) Recovery</u>		
From Page 4, Line 13		<u>\$ 289,100</u>
<u>(E) CSR Customers Buy-Through Adjustment</u>		
		<u>\$ 31,233</u>
TOTAL FUEL RECOVERY (A+B-C-D-E) =		<u><u>\$ 28,239,885</u></u>

Notes: (1) Reflects exclusion of IMEA/IMPA portion of Trimble County fuel cost with recognition of 0.5% transmission losses per Commission's Order in Case No. 2012-00553.

Coal burned = \$5,920

Gas burned = \$102

**LOUISVILLE GAS AND ELECTRIC COMPANY**

**Response to Commission Staff's First Request for Information  
Dated September 6, 2023**

**Case No. 2023-00011**

**Question No. 25**

**Responding Witness: Andrea M. Fackler**

- Q-25. Provide a schedule showing each component of sales as defined by 807 KAR 5:056 in the selected base period (b). Explain why LG&E believes that the sales in the selected base period (b) are representative of the level of kWh sales that LG&E will derive from the level of fuel cost incurred during the selected base period (b).
- a. Separately provide the amounts of power purchases used in the calculation of sales provided.
  - b. Separately provide the amounts of intersystem power sales used in the calculation of sales provided.
- A-25.
- a-b. Attached is a copy of the Sales Schedule (Form A, Page 3) for the base period of January 2022, which shows the components of the proposed S(b) as defined by 807 KAR 5:056. The Company considered F(b) and S(b) collectively in determining the appropriate month to use as a new fuel base rate since together they produce the monthly FAC per unit cost. See also the Direct Testimony of Andrea M. Fackler for further discussion of the proposed fuel base rate and the selection of the base period.

**LOUISVILLE GAS AND ELECTRIC COMPANY**

**SALES SCHEDULE (KWH)**

Expense Month: January 2022

(A)	Generation (Net)	(+)	1,101,651,059
	Purchases including interchange-in	(+)	34,549,000
	Internal Economy	(+)	6,458,000
	Internal Replacement	(+)	22,537,000
	SUB-TOTAL		1,165,195,059
(B)	Inter-system Sales including interchange-out	(+)	40,398,000
	Internal Economy	(+)	92,616,000
	Internal Replacement	(+)	602,000
	System Losses ( 1,031,579,059 KWH times 4.29% )	(+)	44,254,742
	SUB-TOTAL		177,870,742
	TOTAL SALES (A-B)		987,324,317

**LOUISVILLE GAS AND ELECTRIC COMPANY**

**Response to Commission Staff's First Request for Information  
Dated September 6, 2023**

**Case No. 2023-00011**

**Question No. 26**

**Responding Witness: Andrea M. Fackler**

Q-26. Provide a schedule showing the calculation of LG&E's proposed increase or decrease in its base fuel cost per kWh to be incorporated into its base rate.

A-26.	Proposed Base Fuel Rate	\$0.02860
	Less: Current Base Fuel Rate	<u>\$0.02348</u>
	Increase in Base Fuel Rate	\$0.00512

**LOUISVILLE GAS AND ELECTRIC COMPANY**

**Response to Commission Staff's First Request for Information  
Dated September 6, 2023**

**Case No. 2023-00011**

**Question No. 27**

**Responding Witness: Andrea M. Fackler**

- Q-27. Provide a schedule of the present and proposed rates that LG&E seeks to change pursuant to 807 KAR 5:056, shown in comparative form.
- A-27. See attached present and proposed rates that the Company seeks approval for effective with services rendered on the first day of the month following the Commission's issuance of a Final Order in this proceeding.

Tariff Sheet	Tariff	Current Base Rate	Current Base Fuel Rate	Current Base Rate Excluding Fuel	Proposed Base Fuel Rate	Proposed Base Rate Including Fuel	% Change
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
				(3) - (4)		(5) + (6)	((7) - (3)) / (3)
5	RS	\$ 0.10092	\$ 0.02348	\$ 0.07744	\$ 0.02860	\$ 0.10604	5.07%
6	RTOD-Energy						
	<i>On-Peak</i>	\$ 0.17727	\$ 0.02348	\$ 0.15379	\$ 0.02860	\$ 0.18239	2.89%
	<i>Off-Peak</i>	\$ 0.08052	\$ 0.02348	\$ 0.05704	\$ 0.02860	\$ 0.08564	6.36%
7	RTOD - Demand	\$ 0.05260	\$ 0.02348	\$ 0.02912	\$ 0.02860	\$ 0.05772	9.73%
11	GTOD-Energy						
	<i>On-Peak</i>	\$ 0.24576	\$ 0.02348	\$ 0.22228	\$ 0.02860	\$ 0.25088	2.08%
	<i>Off-Peak</i>	\$ 0.07964	\$ 0.02348	\$ 0.05616	\$ 0.02860	\$ 0.08476	6.43%
12	GTOD - Demand	\$ 0.05853	\$ 0.02348	\$ 0.03505	\$ 0.02860	\$ 0.06365	8.75%
9	VFD	\$ 0.10092	\$ 0.02348	\$ 0.07744	\$ 0.02860	\$ 0.10604	5.07%
10	GS	\$ 0.11855	\$ 0.02348	\$ 0.09507	\$ 0.02860	\$ 0.12367	4.32%
15	PS						
	<i>Secondary</i>	\$ 0.03362	\$ 0.02348	\$ 0.01014	\$ 0.02860	\$ 0.03874	15.23%
	<i>Primary</i>	\$ 0.03279	\$ 0.02348	\$ 0.00931	\$ 0.02860	\$ 0.03791	15.61%
20	TODS	\$ 0.02958	\$ 0.02348	\$ 0.00610	\$ 0.02860	\$ 0.03470	17.31%
22	TODP	\$ 0.02662	\$ 0.02348	\$ 0.00314	\$ 0.02860	\$ 0.03174	19.23%
25	RTS	\$ 0.02625	\$ 0.02348	\$ 0.00277	\$ 0.02860	\$ 0.03137	19.50%
30	FLS						
	<i>Primary</i>	\$ 0.03156	\$ 0.02348	\$ 0.00808	\$ 0.02860	\$ 0.03668	16.22%
	<i>Transmission</i>	\$ 0.03103	\$ 0.02348	\$ 0.00755	\$ 0.02860	\$ 0.03615	16.50%
37	LE	\$ 0.07213	\$ 0.02348	\$ 0.04865	\$ 0.02860	\$ 0.07725	7.10%
38	TE	\$ 0.08574	\$ 0.02348	\$ 0.06226	\$ 0.02860	\$ 0.09086	5.97%
81	OSL						
	<i>Secondary</i>	\$ 0.02958	\$ 0.02348	\$ 0.00610	\$ 0.02860	\$ 0.03470	17.31%
	<i>Primary</i>	\$ 0.02662	\$ 0.02348	\$ 0.00314	\$ 0.02860	\$ 0.03174	19.23%

Tariff Sheet	Tariff	Service Type	Bulb Type	Rate Code	Fixture Type	kW Per Light	kWh per Year*	Fuel Factor Change \$/kWh**	Annual Change	Monthly Change	Monthly Charge		
											Existing Monthly Fixture Charge	Proposed Monthly Fixture Charge	% Change
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)
							(7) * 4,000	\$ 0.00512	(8) * (9)	(10) / 12 mos.		(11) + (12)	(11) / (12)
35	LS	Overhead Service	Light Emitting Diode (LED)										
				490	Cobra Head	0.071	284	\$ 0.00512	\$ 1.45	\$ 0.12	\$ 10.41	\$ 10.53	1.15%
				491	Cobra Head	0.122	488	\$ 0.00512	\$ 2.50	\$ 0.21	\$ 12.36	\$ 12.57	1.70%
				492	Cobra Head	0.194	776	\$ 0.00512	\$ 3.97	\$ 0.33	\$ 15.61	\$ 15.94	2.11%
				493	Open Bottom	0.048	192	\$ 0.00512	\$ 0.98	\$ 0.08	\$ 9.46	\$ 9.54	0.85%
				LC1	Cobra Head	0.022	88	\$ 0.00512	\$ 0.45	\$ 0.04	\$ 9.08	\$ 9.12	0.44%
				LC3	Cobra Head	0.039	156	\$ 0.00512	\$ 0.80	\$ 0.07	\$ 9.62	\$ 9.69	0.73%
				LF1	Directional (Flood)	0.030	120	\$ 0.00512	\$ 0.61	\$ 0.05	\$ 11.90	\$ 11.95	0.42%
				LF2	Directional (Flood)	0.096	384	\$ 0.00512	\$ 1.97	\$ 0.16	\$ 13.80	\$ 13.96	1.16%
				LF3	Directional (Flood)	0.175	700	\$ 0.00512	\$ 3.58	\$ 0.30	\$ 16.14	\$ 16.44	1.86%
				LF4	Directional (Flood)	0.297	1,188	\$ 0.00512	\$ 6.08	\$ 0.51	\$ 22.78	\$ 23.29	2.24%
35.1	LS	Underground Service	Light Emitting Diode (LED)										
				LC2	Cobra Head	0.022	88	\$ 0.00512	\$ 0.45	\$ 0.04	\$ 4.40	\$ 4.44	0.91%
				LC4	Cobra Head	0.039	156	\$ 0.00512	\$ 0.80	\$ 0.07	\$ 4.91	\$ 4.98	1.43%
				496	Cobra Head	0.071	284	\$ 0.00512	\$ 1.45	\$ 0.12	\$ 5.73	\$ 5.85	2.09%
				497	Cobra Head	0.122	488	\$ 0.00512	\$ 2.50	\$ 0.21	\$ 7.69	\$ 7.90	2.73%
				498	Cobra Head	0.194	776	\$ 0.00512	\$ 3.97	\$ 0.33	\$ 10.94	\$ 11.27	3.02%
				499	Colonial, 4-Sided	0.044	176	\$ 0.00512	\$ 0.90	\$ 0.08	\$ 7.42	\$ 7.50	1.08%
				LA1	Acorn	0.040	160	\$ 0.00512	\$ 0.82	\$ 0.07	\$ 7.23	\$ 7.30	0.97%
				LN1	Contemporary	0.057	228	\$ 0.00512	\$ 1.17	\$ 0.10	\$ 7.11	\$ 7.21	1.41%
				LN2	Contemporary	0.087	348	\$ 0.00512	\$ 1.78	\$ 0.15	\$ 8.45	\$ 8.60	1.78%
				LN3	Contemporary	0.143	572	\$ 0.00512	\$ 2.93	\$ 0.24	\$ 10.32	\$ 10.56	2.33%
				LN4	Contemporary	0.220	880	\$ 0.00512	\$ 4.51	\$ 0.38	\$ 14.75	\$ 15.13	2.58%
				LN5	Contemporary	0.380	1,520	\$ 0.00512	\$ 7.78	\$ 0.65	\$ 20.40	\$ 21.05	3.19%
				LF5	Directional (Flood)	0.030	120	\$ 0.00512	\$ 0.61	\$ 0.05	\$ 8.27	\$ 8.32	0.60%
				LF6	Directional (Flood)	0.096	384	\$ 0.00512	\$ 1.97	\$ 0.16	\$ 10.16	\$ 10.32	1.57%
				LF7	Directional (Flood)	0.175	700	\$ 0.00512	\$ 3.58	\$ 0.30	\$ 12.51	\$ 12.81	2.40%
				LF8	Directional (Flood)	0.297	1,188	\$ 0.00512	\$ 6.08	\$ 0.51	\$ 19.14	\$ 19.65	2.66%
				LV1	Victorian	0.039	156	\$ 0.00512	\$ 0.80	\$ 0.07	\$ 25.55	\$ 25.62	0.27%
				LL1	London	0.079	316	\$ 0.00512	\$ 1.62	\$ 0.13	\$ 27.11	\$ 27.24	0.48%

\* Per KU's Tariff Sheet No. 67, kWh consumed by lighting units are based on 4,000 hours of use per year.

**	Current Fuel Base	Proposed Fuel Base	Difference
	\$ 0.02348	\$ 0.02860	\$ 0.00512





**LOUISVILLE GAS AND ELECTRIC COMPANY**

**Response to Commission Staff's First Request for Information  
Dated September 6, 2023**

**Case No. 2023-00011**

**Question No. 28**

**Responding Witness: Andrea M. Fackler**

- Q-28. Provide a copy of the current tariff showing by cross-outs and inserts all proposed changes in rates.
- A-28. See attached. Attachment 1 is a red-lined version of the current tariff sheets reflecting the proposed changes in base rates. Attachment 2 is a clean version of the proposed tariff sheets.

**Louisville Gas and Electric Company**

P.S.C. Electric No. 13, ~~Fourth~~ **Revision of Original Sheet No. 5**  
Canceling P.S.C. Electric No. 13, ~~Third~~ **Revision of Original Sheet No. 5**

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Standard Rate

RS  
Residential Service

**APPLICABLE**

In all territory served.

**AVAILABILITY**

Available for single-phase secondary delivery to single family residential service subject to the terms and conditions on Sheet No. 100 of this Tariff.

**RATE**

Basic Service Charge per day: \$0.45

Plus an Energy Charge per kWh:	Infrastructure	Variable	Total
	\$0.06927	<del>\$0.03677</del>	<del>\$0.10604</del> //

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"Variable" shall be the rate comprised of costs, such as fuel, that fluctuate with the production of energy used by customers.

"Infrastructure" shall be the rate comprised of costs associated with meeting system demand that do not fluctuate directly with energy usage as well as the portion of fixed customer-related expenses not recovered in the Basic Service Charge.

**ADJUSTMENT CLAUSES**

The bill amount computed at the charges specified above shall be increased or decreased in accordance with the following:

Demand-Side Management Cost Recovery Mechanism	Sheet No. 86
Fuel Adjustment Clause	Sheet No. 85
Off-System Sales Adjustment Clause	Sheet No. 88
Environmental Cost Recovery Surcharge	Sheet No. 87
Home Energy Assistance Program	Sheet No. 92
Franchise Fee	Sheet No. 90
School Tax	Sheet No. 91

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**MINIMUM CHARGE**

The Basic Service Charge shall be the minimum charge.

**DUE DATE OF BILL**

Customer's payment will be due within sixteen (16) business days (no less than twenty-two (22) calendar days) from the date of the bill.

Deleted: October 17, 2022

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**DATE OF ISSUE:** ~~September 22, 2023~~

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State Regulation and Rates  
Louisville, Kentucky

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2023-00011 dated XXXX

**Louisville Gas and Electric Company**

P.S.C. Electric No. 13, ~~Third~~ Revision of Original Sheet No. 6  
Canceling P.S.C. Electric No. 13, ~~Second~~ Revision of Original Sheet No. 6

Standard Rate RTOD-Energy  
**Residential Time-of-Day Energy Service**

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**APPLICABLE**

In the territory served.

**AVAILABILITY**

Available as an option to Customers otherwise served under Rate RS.

1. Service under this rate schedule is limited to a maximum of five hundred (500) Customers taking service on Rates RTOD-Energy and RTOD-Demand combined that are eligible for Rate RS. Company will accept Customers on a first-come-first-served basis.
2. This service is also available to Customers on Rate GS (where the Rate GS service is used in conjunction with a Rate RS service to provide service to a detached garage and energy usage is no more than 300 kWh per month) who demonstrate power delivered to such detached garage is consumed, in part, for the powering of low emission vehicles licensed for operation on public streets or highways. Such vehicles include:
  - a) battery electric vehicles or plug-in hybrid electric vehicles recharged through a charging outlet at Customer's premises,
  - b) natural gas vehicles refueled through an electric-powered refueling appliance at Customer's premises.
3. A Customer electing to take service under this rate schedule who subsequently elects to take service under Rate RS may not be allowed to return to this optional rate for twelve (12) months from the date of exiting this rate schedule.

**RATE**

Basic Service Charge per day: \$0.45

Plus an Energy Charge per kWh:	Infrastructure	Variable	Total	
Off-Peak Hours:	\$0.04887	<del>\$0.03677</del>	<del>\$0.08564</del>	I/I
On-Peak Hours:	\$0.14562	<del>\$0.03677</del>	<del>\$0.18239</del>	I/I

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"Variable" shall be the rate comprised of costs, such as fuel, that fluctuate with the production of energy used by customers.

"Infrastructure" shall be the rate comprised of costs associated with meeting system demand that do not fluctuate directly with energy usage as well as the portion of fixed customer-related expenses not recovered in the Basic Service Charge.

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Deleted: 2020-00350 dated December 6, 2021 and amended on December 8, 2021

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**Louisville Gas and Electric Company**

P.S.C. Electric No. 13, ~~Third~~ Revision of Original Sheet No. 7  
Canceling P.S.C. Electric No. 13, ~~Second~~ Revision of Original Sheet No. 7

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Standard Rate RTOD-Demand  
Residential Time-of-Day Demand Service

**APPLICABLE**

In the territory served.

**AVAILABILITY**

Available as an option to customers otherwise served under Rate RS.

1. Service under this rate schedule is limited to a maximum of five hundred (500) Customers taking service on Rates RTOD-Demand and RTOD-Energy combined that are eligible for Rate RS. Company will accept Customers on a first-come-first-served basis.
2. This service is also available as an option to Customers on Standard Rate GS (where the Rate GS service is used in conjunction with a Rate RS service to provide service to a detached garage and energy usage is no more than 300 kWh per month) who demonstrate power delivered to such detached garage is consumed, in part, for the powering of low emission vehicles licensed for operation on public streets or highways. Such vehicles include:
  - a. battery electric vehicles or plug-in hybrid electric vehicles recharged through a charging outlet at Customer's premises,
  - b. natural gas vehicles refueled through an electric-powered refueling appliance at Customer's premises.
3. A Customer electing to take service under this rate schedule who subsequently elects to take service under Rate RS may not be allowed to return to this optional rate for twelve (12) months from the date of exiting this rate schedule.

**RATE**

Basic Service Charge per day:	\$0.45		
Plus an Energy Charge per kWh:	Infrastructure	Variable	Total
	\$0.02095	<del>\$0.03677</del>	<del>\$0.05772</del> <del>1/1</del>
Plus a Demand Charge per kW:			
Base Hours:	\$ 4.18		
Peak Hours:	\$ 9.16		

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"Variable" shall be the rate comprised of costs, such as fuel, that fluctuate with the production of energy used by customers.

"Infrastructure" shall be the rate comprised of costs associated with meeting system demand that do not fluctuate directly with energy usage as well as the portion of fixed customer-related expenses not recovered in the Basic Service Charge.

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**Louisville Gas and Electric Company**

P.S.C. Electric No. 13, ~~Fourth~~ Revision of Original Sheet No. 9  
Canceling P.S.C. Electric No. 13, ~~Third~~ Revision of Original Sheet No. 9

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Standard Rate **VFD**  
**Volunteer Fire Department Service**

**APPLICABLE**

In all territory served.

**AVAILABILITY**

Available for single-phase delivery, in accordance with the provisions of KRS 278.172, to any volunteer fire department qualifying for aid under KRS 95A.262. Service under this rate schedule is at the option of Customer with Customer determining whether service will be provided under this schedule or any other schedule applicable to this load.

**DEFINITION**

To be eligible for this rate a volunteer fire department is defined as:

- 1) having at least 12 members and a chief;
- 2) having at least one firefighting apparatus; and
- 3) half the members must be volunteers.

**RATE**

Basic Service Charge per day: \$0.45

Plus an Energy Charge per kWh:	Infrastructure	Variable	Total
	\$0.06927	<del>\$0.03677</del>	<del>\$0.10604</del>

/I

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"Variable" shall be the rate comprised of costs, such as fuel, that fluctuate with the production of energy used by customers.

"Infrastructure" shall be the rate comprised of costs associated with meeting system demand that do not fluctuate directly with energy usage as well as the portion of fixed customer-related expenses not recovered in the Basic Service Charge.

**ADJUSTMENT CLAUSES**

The bill amount computed at the charges specified above shall be increased or decreased in accordance with the following:

Demand-Side Management Cost Recovery Mechanism	Sheet No. 86
Fuel Adjustment Clause	Sheet No. 85
Off-System Sales Adjustment Clause	Sheet No. 88
Environmental Cost Recovery Surcharge	Sheet No. 87
Franchise Fee	Sheet No. 90
School Tax	Sheet No. 91

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**MINIMUM CHARGE**

The Basic Service Charge shall be the minimum charge.

**DUE DATE OF BILL**

Customer's payment will be due within sixteen (16) business days (no less than twenty-two (22) calendar days) from the date of the bill.

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**Louisville Gas and Electric Company**

P.S.C. Electric No. 13, **Fourth** Revision of Original Sheet No. 10  
Canceling P.S.C. Electric No. 13, **Third** Revision of Original Sheet No. 10

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Standard Rate GS  
General Service

**APPLICABLE**

In all territory served.

**AVAILABILITY**

To general lighting and small power loads for secondary service.

Service under this schedule will be limited to Customers whose twelve (12)-month-average monthly maximum loads do not exceed 50 kW. Existing Customers with twelve (12)-month-average maximum monthly loads exceeding 50 kW who were receiving service under P.S.C. Electric No. 6, Fourth Revision of Original Sheet No. 10 as of February 6, 2009, will continue to be served under this rate at their option. If Customer is taking service under this rate schedule and subsequently elects to take service under another rate schedule, Customer may not again take service under this rate schedule unless and until Customer meets the Availability requirements that would apply to a new Customer.

**RATE**

Basic Service Charge per day: \$1.16 single-phase service  
\$1.85 three-phase service

Plus an Energy Charge per kWh:	Infrastructure	Variable	Total
	\$0.08595	<del>\$0.03772</del>	<del>\$0.12367</del>

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"Variable" shall be the rate comprised of costs, such as fuel, that fluctuate with the production of energy used by customers.

"Infrastructure" shall be the rate comprised of costs associated with meeting system demand that do not fluctuate directly with energy usage as well as the portion of fixed customer-related expenses not recovered in the Basic Service Charge.

**ADJUSTMENT CLAUSES**

The bill amount computed at the charges specified above shall be increased or decreased in accordance with the following:

Demand-Side Management Cost Recovery Mechanism	Sheet No. 86
Fuel Adjustment Clause	Sheet No. 85
Off-System Sales Adjustment Clause	Sheet No. 88
Environmental Cost Recovery Surcharge	Sheet No. 87
Franchise Fee	Sheet No. 90
School Tax	Sheet No. 91

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**DETERMINATION OF LOAD**

Service hereunder will be metered except when, by mutual agreement of Company and Customer, an unmetered installation is more satisfactory. In the case of unmetered service, billing will be based on a calculated consumption taking into account the types of equipment served.

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**Louisville Gas and Electric Company**

P.S.C. Electric No. 13, **Fourth** Revision of Original Sheet No. 11  
Canceling P.S.C. Electric No. 13, **Third** Revision of Original Sheet No. 11

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Standard Rate GTOD-Energy  
General Time-of-Day Energy Service

**APPLICABLE**

In all territory served.

**AVAILABILITY**

Available to GS Customers participating in the Demand-Side Management ("DSM") program titled Non-Residential Advanced Metering Systems Incentive on Sheet No. 86.6.

A Customer electing to take service under this rate schedule who subsequently elects to take service under the standard rate GS will not be allowed to return to this rate for 12 months from the date of exiting this rate schedule.

**RATE**

Basic Service Charge per day: \$ 1.16 single-phase service  
\$ 1.85 three-phase service

Plus an Energy Charge per kWh:	Infrastructure	Variable	Total
Off-Peak Hours	\$0.04704	<del>\$0.03772</del>	<del>\$0.08476</del>
On-Peak Hours	\$0.21316	<del>\$0.03772</del>	<del>\$0.25088</del>

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"Variable" shall be the rate comprised of costs, such as fuel, that fluctuate with the production of energy used by customers.

"Infrastructure" shall be the rate comprised of costs associated with meeting system demand that do not fluctuate directly with energy usage as well as the portion of fixed customer-related expenses not recovered in the Basic Service Charge.

**ADJUSTMENT CLAUSES**

The bill amount computed at the charges specified above shall be increased or decreased in accordance with the following:

Demand-Side Management Cost Recovery Mechanism	Sheet No. 86
Fuel Adjustment Clause	Sheet No. 85
Off-System Sales Adjustment Clause	Sheet No. 88
Environmental Cost Recovery Surcharge	Sheet No. 87
Franchise Fee	Sheet No. 90
School Tax	Sheet No. 91

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**DETERMINATION OF MAXIMUM LOAD**

The load will be measured and will be the average kW demand delivered to Customer during the 15-minute period of maximum use during the appropriate rating period each month.

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**Louisville Gas and Electric Company**

P.S.C. Electric No. 13, **Fourth** Revision of Original Sheet No. 12  
 Canceling P.S.C. Electric No. 13, **Third** Revision of Original Sheet No. 12

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**Standard Rate** **GTOD-Demand**  
**General Time-of-Day Demand Service**

**APPLICABLE**

In all territory served.

**AVAILABILITY**

Available to GS Customers participating in the Demand-Side Management ("DSM") program titled Non-Residential Advanced Metering Systems Incentive on Sheet No. 86.6.

A Customer electing to take service under this rate schedule who subsequently elects to take service under the standard rate GS will not be allowed to return to this rate for 12 months from the date of exiting this rate schedule.

**RATE**

Basic Service Charge per day: \$ 1.16 single-phase service  
\$ 1.85 three-phase service

Plus an Energy Charge per kWh: Infrastructure Variable Total  
\$0.02593 ~~\$0.03772~~ ~~\$0.06365~~ /!

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Plus a Demand Charge per kW:  
 Base Hours: \$ 5.37  
 Peak Hours: \$ 11.75

"Variable" shall be the rate comprised of costs, such as fuel, that fluctuate with the production of energy used by customers.

"Infrastructure" shall be the rate comprised of costs associated with meeting system demand that do not fluctuate directly with energy usage as well as the portion of fixed customer-related expenses not recovered in the Basic Service Charge.

**ADJUSTMENT CLAUSES**

The bill amount computed at the charges specified above shall be increased or decreased in accordance with the following:

Demand-Side Management Cost Recovery Mechanism	Sheet No. 86
Fuel Adjustment Clause	Sheet No. 85
Off-System Sales Adjustment Clause	Sheet No. 88
Environmental Cost Recovery Surcharge	Sheet No. 87
Franchise Fee	Sheet No. 90
School Tax	Sheet No. 91

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**Louisville Gas and Electric Company**

P.S.C. Electric No. 13, ~~Third~~ Revision of Original Sheet No. 15  
Canceling P.S.C. Electric No. 13, ~~Second~~ Revision of Original Sheet No. 15

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Standard Rate PS  
Power Service

**APPLICABLE**

In all territory served.

**AVAILABILITY**

Available for secondary or primary service and limited to Customers whose twelve (12)-month-average monthly minimum secondary loads exceed 50 kW and whose twelve (12)-month-average monthly maximum loads do not exceed 250 kW. Secondary or primary Customers receiving service under P.S.C. of Ky. Electric No. 6, Fourth Revision of Original Sheet No. 15, Large Commercial Rate LC, and Fourth Revision of Original Sheet No. 25, Large Power Industrial Rate LP, as of February 6, 2009, with loads not meeting these criteria will continue to be served under this rate at their option. If Customer is taking service under this rate schedule and subsequently elects to take service under another rate schedule, Customer may not again take service under this rate schedule unless and until Customer meets the Availability requirements that would apply to a new Customer.

**RATE**

	Secondary	Primary	
Basic Service Charge per day:	\$2.95	\$7.89	
Plus an Energy Charge per kWh:	<del>\$0.03874</del>	<del>\$0.03791</del>	/I/
Plus a Demand Charge per kW:			
Summer Rate:			
(Five Billing Periods of May through September)	\$27.57	\$24.14	▼ Deleted: /I/
Winter Rate:			
(All other months)	\$24.28	\$21.02	▼ Deleted: /I/

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Where the monthly billing demand is the greater of:

- a. the maximum measured load in the current billing period but not less than 50 kW for secondary service or 25 kW for primary service, or
- b. a minimum of 50% of the highest measured load in the preceding eleven (11) monthly billing periods, or
- c. if applicable, a minimum of 60% of the contract capacity based on the maximum expected load on the system or on facilities specified by Customer.

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**Louisville Gas and Electric Company**

P.S.C. Electric No. 13, **Fourth** Revision of Original Sheet No. 20  
Canceling P.S.C. Electric No. 13, **Third** Revision of Original Sheet No. 20

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Standard Rate  
TODS  
Time-of-Day Secondary Service

**APPLICABLE**

In all territory served.

**AVAILABILITY**

Available for secondary service to Customers whose twelve (12)-month-average monthly minimum loads exceed 250 kVA and whose twelve (12)-month-average monthly maximum loads do not exceed 5,000 kVA.

**RATE**

Basic Service Charge per day: \$ 6.58

Plus an Energy Charge per kWh: \$ **0.03470**

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Plus a Maximum Load Charge per kVA:

Peak Demand Period: \$ 9.70

Intermediate Demand Period: \$ 7.48

Base Demand Period: \$ 3.76

Where:

the monthly billing demand for the Peak and Intermediate Demand Periods is the greater of:

1. the maximum measured load in the current billing period, or
2. a minimum of 50% of the highest measured load in the preceding eleven (11) monthly billing periods, and

the monthly billing demand for the Base Demand Period is the greater of:

1. the maximum measured load in the current billing period but not less than 250 kVA, or
2. the highest measured load in the preceding eleven (11) monthly billing periods, or
3. the contract capacity based on the maximum load expected on the system or on facilities specified by Customer.

**ADJUSTMENT CLAUSES**

The bill amount computed at the charges specified above shall be increased or decreased in accordance with the following:

Demand-Side Management Cost Recovery Mechanism	Sheet No. 86
Fuel Adjustment Clause	Sheet No. 85
Off-System Sales Adjustment Clause	Sheet No. 88
Environmental Cost Recovery Surcharge	Sheet No. 87
Franchise Fee	Sheet No. 90
School Tax	Sheet No. 91

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**Louisville Gas and Electric Company**

P.S.C. Electric No. 13, **Fourth** Revision of Original Sheet No. 25  
Canceling P.S.C. Electric No. 13, **Third** Revision of Original Sheet No. 25

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Standard Rate **RTS**  
**Retail Transmission Service**

**APPLICABLE**  
In all territory served.

**AVAILABILITY**  
Available for transmission service to any Customer: (1) who has a twelve (12)-month-average monthly minimum demand exceeding 250 kVA; and (2) whose new or additional load receives any required approval of Company's transmission operator.

**RATE**  
Basic Service Charge per day: \$ 49.28  
Plus an Energy Charge per kWh: \$ 0.03137  
Plus a Maximum Load Charge per kVA:  
Peak Demand Period: \$ 9.36  
Intermediate Demand Period: \$ 7.18  
Base Demand Period: \$ 1.93

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Where:  
the monthly billing demand for the Peak and Intermediate Demand Periods is the greater of:  
1. the maximum measured load in the current billing period, or  
2. a minimum of 50% of the highest measured load in the preceding eleven (11) monthly billing periods, and  
the monthly billing demand for the Base Demand Period is the greater of:  
1. the maximum measured load in the current billing period but not less than 250 kVA, or  
2. the highest measured load in the preceding eleven (11) monthly billing periods, or  
3. the contract capacity based on the maximum expected load on the system or on facilities specified by Customer.

**ADJUSTMENT CLAUSES**  
The bill amount computed at the charges specified above shall be increased or decreased in accordance with the following:

Demand-Side Management Cost Recovery Mechanism	Sheet No. 86
Fuel Adjustment Clause	Sheet No. 85
Off-System Sales Adjustment Clause	Sheet No. 88
Environmental Cost Recovery Surcharge	Sheet No. 87
Franchise Fee	Sheet No. 90
School Tax	Sheet No. 91

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**Louisville Gas and Electric Company**

P.S.C. Electric No. 13, ~~Third~~ Revision of Original Sheet No. 30  
Canceling P.S.C. Electric No. 13, ~~Second~~ Revision of Original Sheet No. 30

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Standard Rate FLS  
Fluctuating Load Service

**APPLICABLE**

In all territory served.

**AVAILABILITY**

Available for primary or transmission service to Customers up to an aggregate of two hundred (200) MVA for all Customers taking service under this schedule and under the Fluctuating Load Service Rate FLS schedule of Kentucky Utilities Company. This schedule is restricted to individual Customers whose monthly demand is twenty (20) MVA or greater. A Customer is defined as a fluctuating load if that Customer's load either increases or decreases twenty (20) MVA or more per minute or seventy (70) MVA or more in ten (10) minutes when such increases or decreases exceed one (1) occurrence per hour during any hour of the billing month.

Subject to the above aggregate limit of two hundred (200) MVA, this schedule is mandatory for all Customers whose load is defined as fluctuating and not served on another rate schedule as of July 1, 2004.

**BASE RATE**

	Primary	Transmission	
Basic Service Charge per day:	\$ 10.84	\$ 49.28	
Plus an Energy Charge per kWh:	\$ <del>0.03668</del>	\$ <del>0.03615</del>	/l
Plus a Maximum Load Charge per kVA:			
Peak Demand Period:	\$ 9.34	\$ 8.95	
Intermediate Demand Period:	\$ 7.10	\$ 6.76	
Base Demand Period:	\$ 2.32	\$ 1.67	

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Where:

the monthly billing demand for the Peak and Intermediate Demand Periods is the greater of:

1. the maximum measured load in the current billing period, or
2. a minimum of 50% of the highest measured load in the preceding eleven (11) monthly billing periods, and

the monthly billing demand for the Base Demand Period is the greater of:

1. the maximum measured load in the current billing period but not less than 20,000 kVA, or
2. the highest measured load in the preceding eleven (11) monthly billing periods, or
3. the contract capacity based on the maximum expected load on the system or on facilities specified by Customer.

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**DATE OF ISSUE:** ~~September 22, 2023~~

**DATE EFFECTIVE:** With Service Rendered  
On and After ~~XXXX XX, 2024~~

**ISSUED BY:** /s/ Robert M. Conroy, Vice President  
State Regulation and Rates  
Louisville, Kentucky

**Issued by Authority of an Order of the  
Public Service Commission in Case No.  
~~2023-00011 dated XXXX~~**

**Louisville Gas and Electric Company**

P.S.C. Electric No. 13, **Third** Revision of Original Sheet No. 35  
Canceling P.S.C. Electric No. 13, **Second** Revision of Original Sheet No. 35

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Standard Rate LS  
**Lighting Service**

**APPLICABLE**

In all territory served.

**AVAILABILITY**

Available under the conditions set out hereinafter for lighting applications such as, but not limited to, the illumination of streets, driveways, yards, lots, and other outdoor areas where secondary voltage of 120/240 is available.

Service will be provided under written contract, signed by Customer prior to service commencing, when additional facilities are required, when the installation includes new underground-fed lights, when the installation includes three (3) or more overhead-fed lights, or when Customer requests conversion to LED.

**OVERHEAD SERVICE**

Based on Customer's lighting choice, Company will furnish, own, install, and maintain the lighting unit. A basic overhead service includes lamp, fixture, photoelectric control, mast arm, and, if needed, up to 150 feet of conductor per fixture on existing wood poles (fixture only).

**RATE**

Rate Code	Type of Fixture	Lumen Range	kW Per Light	Monthly Charge Fixture Only
-----------	-----------------	-------------	--------------	-----------------------------

**Light Emitting Diode (LED)**

490	Cobra Head	5,500-8,200	0.071	<del>\$10.53</del>
491	Cobra Head	13,000-16,500	0.122	<del>12.57</del>
492	Cobra Head	22,000-29,000	0.194	<del>15.94</del>
493	Open Bottom	4,500-6,000	0.048	<del>9.54</del>
LC1	Cobra Head	2,500-4,000	0.022	<del>9.12</del>
LC3	Cobra Head	4,000-6,000	0.039	<del>9.69</del>
LF1	Directional (Flood)	4,500-6,000	0.030	<del>11.95</del>
LF2	Directional (Flood)	14,000-17,500	0.096	<del>13.96</del>
LF3	Directional (Flood)	22,000-28,000	0.175	<del>16.44</del>
LF4	Directional (Flood)	35,000-50,000	0.297	<del>23.29</del>

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**Wood Pole**

PL6 \$ 7.08

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**Louisville Gas and Electric Company**

P.S.C. Electric No. 13, ~~Third~~ Revision of Original Sheet No. 35.1  
Canceling P.S.C. Electric No. 13, ~~Second~~ Revision of Original Sheet No. 35.1

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Standard Rate LS  
**Lighting Service**

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**UNDERGROUND SERVICE**

Based on Customer's lighting choice, Company will furnish, own, install, and maintain poles, fixtures, and any necessary circuitry up to 200 feet. All poles and fixtures furnished by Company will be standard stocked materials. Company may decline to install equipment and provide service thereto in locations deemed by Company as unsuitable for underground installation.

RATE Rate Code	Type of Fixture	Lumens Range	kW Per Light	Fixture Charge
----------------------	--------------------	-----------------	-----------------	-------------------

**Light Emitting Diode (LED)**

LC2	Cobra Head	2,500-4,000	0.022	<del>\$4.44</del>
LC4	Cobra Head	4,000-6,000	0.039	<del>\$4.98</del>
496	Cobra Head	5,500-8,200	0.071	<del>\$5.85</del>
497	Cobra Head	13,000-16,500	0.122	<del>\$7.90</del>
498	Cobra Head	22,000-29,000	0.194	<del>\$11.27</del>
499	Colonial, 4-Sided	4,000-7,000	0.044	<del>\$7.50</del>
LA1	Acorn	4,000-7,000	0.040	<del>\$7.30</del>
LN1	Contemporary	4,000-7,000	0.057	<del>\$7.21</del>
LN2	Contemporary	8,000-11,000	0.087	<del>\$8.60</del>
LN3	Contemporary	13,500-16,500	0.143	<del>\$10.56</del>
LN4	Contemporary	21,000-28,000	0.220	<del>\$15.13</del>
LN5	Contemporary	45,000-50,000	0.380	<del>\$21.05</del>
LF5	Directional (Flood)	4,500-6,000	0.030	<del>\$8.32</del>
LF6	Directional (Flood)	14,000-17,500	0.096	<del>\$10.32</del>
LF7	Directional (Flood)	22,000-28,000	0.175	<del>\$12.81</del>
LF8	Directional (Flood)	35,000-50,000	0.297	<del>\$19.65</del>
LV1	Victorian	4,000-7,000	0.039	<del>\$25.62</del>
LL1	London	4,000-7,000	0.079	<del>\$27.24</del>

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**Louisville Gas and Electric Company**

P.S.C. Electric No. 13, ~~Third~~ Revision of Original Sheet No. 36  
Canceling P.S.C. Electric No. 13, ~~Second~~ Revision of Original Sheet No. 36

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Standard Rate RLS  
Restricted Lighting Service

**APPLICABLE**

In all territory served.

**AVAILABILITY**

Availability is restricted to those lighting fixtures/poles in service as of July 1, 2021. Spot replacements will not be available for High Pressure Sodium, Metal Halide, Mercury Vapor and Incandescent rate codes.

In the event restricted fixtures/poles fail, Customer will be given the choice of having Company remove the failed fixture/pole or having Company replace the failed fixture/pole with comparable LED fixture/pole.

Units marked with an asterisk (\*) are not available for use in residential neighborhoods except by municipal authorities.

**OVERHEAD SERVICE**

Based on Customer's lighting choice, Company has furnished, installed, and maintained the lighting unit complete with lamp, fixture, photoelectric control, mast arm, and, if needed, up to 150 feet of conductor per fixture on existing wood poles (fixture only).

RATE Rate Code	Type of Fixture	Approximate Lumens	kW Per Light	Monthly Charge		
				Fixture Only	Fixture & Wood Pole	Fixture & Orn. Pole
<b>Mercury Vapor</b>						
252	Cobra/Open Bottom	8,000	0.210	<del>\$11.97</del>		
203	Cobra Head	13,000	0.298	<del>13.65</del>		
204	Cobra Head	25,000	0.462	<del>16.84</del>		
209	Cobra Head	60,000*	1.180	<del>34.38</del>		
207	Directional	25,000	0.462	<del>19.07</del>		
210	Directional	60,000*	1.180	<del>35.68</del>		
201	Open Bottom	4,000	0.100	<del>10.27</del>		
<b>Metal Halide</b>						
470/471	Directional	12,000	0.150	<del>16.21</del>	<del>\$19.09</del>	
474/475	Directional	32,000*	0.350		<del>25.04</del>	<del>\$33.05</del>
476/477	Directional	107,800*	1.080	<del>47.69</del>	<del>51.12</del>	
473	Directional	32,000*	0.350	<del>22.58</del>		

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**Louisville Gas and Electric Company**

P.S.C. Electric No. 13, ~~Third~~ Revision of Original Sheet No. 36.1  
Canceling P.S.C. Electric No. 13, ~~Second~~ Revision of Original Sheet No. 36.1

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Standard Rate RLS  
Restricted Lighting Service

RATE (continued)		Approximate Lumens	kW Per Light	Monthly Charge		
Rate Code	Type of Fixture			Fixture Only	Fixture & Wood Pole	Fixture & Orn. Pole
<b>High Pressure Sodium</b>						
452	Cobra Head	16,000	0.181	<del>\$15.74</del>		
453	Cobra Head	28,500	0.294	<del>18.45</del>		
454	Cobra Head	50,000*	0.471	<del>21.21</del>		
455	Directional	16,000	0.181	<del>\$16.77</del>		
456	Directional	50,000*	0.471	<del>22.10</del>		
457	Open Bottom	9,500	0.117	<del>\$13.92</del>		

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**UNDERGROUND SERVICE**

Based on Customer's lighting choice, Company has furnished, installed, and maintained the lighting unit complete with lamp, fixture, photoelectric control, mast arm, and, if needed, up to 200 feet of conductor per fixture on appropriate poles.

RATE Code	Type of Fixture	Approximate Lumens	kW Per Light	Monthly Charge		
				Fixture Only	Decorative Smooth	Fluted Pole
<b>High Pressure Sodium</b>						
275	Cobra/Contemporary	16,000	0.181		<del>\$29.89</del>	
266	Cobra/Contemporary	28,500	0.294		<del>32.93</del>	
267	Cobra Contemporary	50,000*	0.471		<del>37.75</del>	
276	Coach/Acom	5,800	0.083		<del>18.12</del>	
274	Coach/Acom	9,500	0.117		<del>21.56</del>	
277	Coach/Acom	16,000	0.181		<del>26.37</del>	
279/278	Contemporary	120,000*	1.000	<del>\$52.12</del>	<del>85.47</del>	
417	Acom, Bronze	9,500	0.117		<del>29.02</del>	
419	Acom, Bronze	16,000	0.180		<del>30.40</del>	
280	Victorian	5,800	0.083	<del>\$24.55</del>		
281	Victorian	9,500	0.117	<del>25.07</del>		
282	London	5,800	0.083	<del>24.13</del>		
283	London	9,500	0.117	<del>25.61</del>		
426/427	London	5,800	0.083		<del>\$38.76</del>	<del>\$40.91</del>
428/429	London	9,500	0.117		<del>39.75</del>	<del>40.93</del>
430/431	Victorian	5,800	0.083		<del>37.71</del>	<del>38.45</del>
432/433	Victorian	9,500	0.117		<del>40.02</del>	<del>43.18</del>

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State Regulation and Rates  
Louisville, Kentucky

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**Louisville Gas and Electric Company**

P.S.C. Electric No. 13, ~~Third~~ Revision of Original Sheet No. 36.2  
 Canceling P.S.C. Electric No. 13, ~~Second~~ Revision of Original Sheet No. 36.2

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Standard Rate RLS  
 Restricted Lighting Service

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**UNDERGROUND SERVICE (continued)**

RATE	Rate Code	Type of Fixture	Approximate Lumens	kW Per Light	Monthly Charge	
					Fixture Only	Decorative Smooth
<b>High Pressure Sodium (continued)</b>						
	412	Colonial, 4-Sided	5,800	0.083		\$24.00
	413	Colonial, 4-Sided	9,500	0.117		24.80
	444	Colonial, 4-Sided	16,000	0.181		24.79
	415	Acorn	5,800	0.083		24.43
	416	Acorn	9,500	0.117		27.08
	445	Acorn	16,000	0.181		26.93
	400	Dark Sky	4,000	0.060		28.47
	401	Dark Sky	9,500	0.117		28.96
	423	Cobra Head	16,000	0.181		31.53
	424	Cobra Head	28,500	0.294		34.17
	425	Cobra Head	50,000*	0.471		40.68
	439/420	Contemporary	16,000	0.181	\$19.64	35.49
	440/421	Contemporary	28,500*	0.294	21.89	38.42
	441/422	Contemporary	50,000*	0.471	26.50	44.76

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**Mercury Vapor**

	318	Cobra Head	8,000	0.210		\$20.57
	314	Cobra Head	13,000	0.298		23.25
	315	Cobra Head	25,000	0.462		27.22
	206	Coach	4,000	0.100		15.02
	208	Coach	8,000	0.210		17.08

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**Metal Halide**

	479/480	Contemporary	12,000	0.150	\$17.95	\$29.21
	483/484	Contemporary	107,800*	1.080	50.89	62.77
	481/482	Contemporary	32,000*	0.350	24.50	36.41

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**Incandescent**

	349	Continental Jr.	1,500	0.102		\$10.78
	348	Continental Jr.	6,000	0.447		15.80

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**Victorian/London Bases**

	950	Old Town				\$ 3.88
	951	Chesapeake				4.10
	956	Victorian/London (Westchester/Norfolk)				3.97

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**Poles**

	901	10' Smooth Pole				\$11.59
	902	10' Fluted Pole				13.84

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Where Customer's location required the installation of additional facilities, Company may have furnished the requested facilities at an additional charge per month to be determined under the Excess Facilities Rider.

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**Louisville Gas and Electric Company**

P.S.C. Electric No. 13, **Third** Revision of Original Sheet No. 37  
Canceling P.S.C. Electric No. 13, **Second** Revision of Original Sheet No. 37

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Standard Rate LE  
Lighting Energy Service

**APPLICABLE**

In all territory served.

**AVAILABILITY**

Available to municipalities, county governments, divisions or agencies of the state or Federal governments, civic associations, and other public or quasi-public agencies for service to public street and highway lighting systems, where the municipality or other agency owns and maintains all street lighting equipment and other facilities on its side of the point of delivery of the energy supplied hereunder.

**RATE**

~~\$0.07725~~ per kWh

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**ADJUSTMENT CLAUSES**

The bill amount computed at the charges specified above shall be increased or decreased in accordance with the following:

Fuel Adjustment Clause	Sheet No. 85
Off-System Sales Adjustment Clause	Sheet No. 88
Environmental Cost Recovery Surcharge	Sheet No. 87
Franchise Fee	Sheet No. 90
School Tax	Sheet No. 91

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**DUE DATE OF BILL**

Customer's payment will be due within sixteen (16) business days (no less than twenty-two (22) calendar days) from the date of the bill.

**CONDITIONS OF DELIVERY**

1. Service hereunder will be metered except when, by mutual agreement of Company and Customer, an unmetered installation will be more satisfactory from the standpoint of both parties. In the case of unmetered service, billing will be based on a calculated consumption taking into account the types of equipment served.
2. The location of the point of delivery of the energy supplied hereunder and the voltage at which such delivery is effected shall be mutually agreed upon by Company and the Customer in consideration of the type and size of Customer's street lighting system and the voltage which Company has available for delivery.

**TERMS AND CONDITIONS**

Service will be furnished under Company's Terms and Conditions applicable hereto.

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**Louisville Gas and Electric Company**

P.S.C. Electric No. 13, **Third** Revision of Original Sheet No. 38  
Canceling P.S.C. Electric No. 13, **Second** Revision of Original Sheet No. 38

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Standard Rate TE  
**Traffic Energy Service**

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**APPLICABLE**

In all territory served.

**AVAILABILITY**

Available to municipalities, county governments, divisions of the state or Federal governments or any other governmental agency for service on a 24-hour all-day every-day basis, where the governmental agency owns and maintains all equipment on its side of the point of delivery of the energy supplied hereunder. In the application of this rate each point of delivery will be considered as a separate Customer.

This service is limited to devices including, but not limited to, signals, cameras, or other traffic lights, electronic communication devices, emergency sirens, and gunshot triangulation devices.

**RATE**

Basic Service Charge per day: \$0.13 per delivery point

Plus an Energy Charge per kWh: \$0.09086

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**ADJUSTMENT CLAUSES**

The bill amount computed at the charges specified above shall be increased or decreased in accordance with the following:

Fuel Adjustment Clause	Sheet No. 85
Off-System Sales Adjustment Clause	Sheet No. 88
Environmental Cost Recovery Surcharge	Sheet No. 87
Franchise Fee	Sheet No. 90
School Tax	Sheet No. 91

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**MINIMUM CHARGE**

The Basic Service Charge shall be the minimum charge.

**DUE DATE OF BILL**

Customer's payment will be due within sixteen (16) business days (no less than twenty-two (22) calendar days) from the date of the bill.

**CONDITIONS OF SERVICE**

1. Service hereunder will be metered except when, by mutual agreement of Company and Customer, an unmetered installation will be more satisfactory from the standpoint of both parties. In the case of unmetered service, billing will be based on a calculated consumption, taking into account the size and characteristics of the load, or on meter readings obtained from a similar installation.

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**Louisville Gas and Electric Company**

P.S.C. Electric No. 13, **Third** Revision of Original Sheet No. 81  
Canceling P.S.C. Electric No. 13, **Second** Revision of Original Sheet No. 81

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Standard Rate Pilot OSL  
Outdoor Sports Lighting Service

**APPLICABLE**

In all territory served.

**AVAILABILITY**

Available as an optional pilot program for secondary and primary service used by a Customer for lighting specifically designed for outdoor fields which are normally used for organized competitive sports. Service under this rate schedule is limited to a maximum of twenty Customers. Company will accept Customers on a first-come-first-served basis.

**RATE**

	Secondary	Primary	
Basic Service Charge per day:	\$ 2.96	\$ 7.89	
Plus an Energy Charge per kWh of:	\$ <u>0.03470</u>	\$ <u>0.03174</u>	/I
Plus a Maximum Load Charge per kW of:			
Peak Demand Period .....	\$ 23.14	\$ 17.17	
Base Demand Period .....	\$ 3.38	\$ 2.21	

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Where:

- the monthly billing demand for the Peak Demand Period is the greater of:
1. the maximum measured load in the billing period, or
  2. a minimum of 50% of the highest billing demand in the preceding eleven (11) monthly billing periods.
- the monthly billing demand for the Base Demand Period is the greater of:
1. the maximum measured load in the billing period, or
  2. the highest measured load in the preceding eleven (11) monthly billing periods, or
  3. if applicable, the contract capacity based on the maximum load expected on the system or on facilities specified by Customer.

**ADJUSTMENT CLAUSES**

The bill amount computed at the charges specified above shall be increased or decreased in accordance with the following:

Demand-Side Management Cost Recovery Mechanism	Sheet No. 86
Fuel Adjustment Clause	Sheet No. 85
Off-System Sales Adjustment Clause	Sheet No. 88
Environmental Cost Recovery Surcharge	Sheet No. 87
Franchise Fee	Sheet No. 90
School Tax	Sheet No. 91

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Louisville, Kentucky

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**Louisville Gas and Electric Company**

P.S.C. Electric No. 13, **Second Revision of Original Sheet No. 85.1**  
Canceling P.S.C. Electric No. 13, **First Revision of Original Sheet No. 85.1**

Adjustment Clause

FAC

Fuel Adjustment Clause

3. Forced Outages are all non-scheduled losses of generation or transmission which require substitute power for a continuous period in excess of six (6) hours. Where forced outages are not as a result of faulty equipment, faulty manufacture, faulty design, faulty installations, faulty operation, or faulty maintenance, but are Acts of God, riot, insurrection or acts of the public enemy, then the utility may, upon proper showing, with the approval of the Commission, include the fuel cost of substitute energy in the adjustment. Until such approval is obtained, in making the calculations of fuel cost (F) in subsection (2)(a) and (b) above, the forced outage costs to be subtracted shall be no less than the fuel cost related to the lost generation.
4. Sales (S) shall be all kWh sold, excluding inter-system sales. Where, for any reason, billed system sales cannot be coordinated with fuel costs for the billing period, sales may be equated to the sum of (i) generation, (ii) purchases, (iii) interchange in, less (iv) energy associated with pumped storage operations, less (v) inter-system sales referred to in subsection (2)(d) above, less (vi) total system losses. Utility used energy shall not be excluded in the determination of sales (S).
5. The cost of fossil fuel shall include no items other than the invoice price of fuel less any cash or other discounts. The invoice price of fuel includes the cost of the fuel itself and necessary charges for transportation of the fuel from the point of acquisition to the unloading point, as listed in Account 151 of FERC Uniform System of Accounts for Public Utilities and Licensees.
6. Base (b) period shall be January 2022 and the base fuel factor is \$0.02860 per kWh. T/L
7. Current (m) period shall be the second month preceding the month in which the Fuel Clause Adjustment Factor is billed.

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State Regulation and Rates  
Louisville, Kentucky

Issued by Authority of an Order of the  
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2023-00011 dated XXXX

**Louisville Gas and Electric Company**

P.S.C. Electric No. 13, Fourth Revision of Original Sheet No. 5

Fackler

Canceling P.S.C. Electric No. 13, Third Revision of Original Sheet No. 5

**Standard Rate****RS****Residential Service****APPLICABLE**

In all territory served.

**AVAILABILITY**

Available for single-phase secondary delivery to single family residential service subject to the terms and conditions on Sheet No. 100 of this Tariff.

**RATE**

Basic Service Charge per day: \$0.45

Plus an Energy Charge per kWh:	Infrastructure	Variable	Total	
	\$0.06927	\$0.03677	\$0.10604	/I

“Variable” shall be the rate comprised of costs, such as fuel, that fluctuate with the production of energy used by customers.

“Infrastructure” shall be the rate comprised of costs associated with meeting system demand that do not fluctuate directly with energy usage as well as the portion of fixed customer-related expenses not recovered in the Basic Service Charge.

**ADJUSTMENT CLAUSES**

The bill amount computed at the charges specified above shall be increased or decreased in accordance with the following:

Demand-Side Management Cost Recovery Mechanism	Sheet No. 86
Fuel Adjustment Clause	Sheet No. 85
Off-System Sales Adjustment Clause	Sheet No. 88
Environmental Cost Recovery Surcharge	Sheet No. 87
Home Energy Assistance Program	Sheet No. 92
Franchise Fee	Sheet No. 90
School Tax	Sheet No. 91

**MINIMUM CHARGE**

The Basic Service Charge shall be the minimum charge.

**DUE DATE OF BILL**

Customer's payment will be due within sixteen (16) business days (no less than twenty-two (22) calendar days) from the date of the bill.

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**Louisville Gas and Electric Company****Standard Rate****RTOD-Energy****Residential Time-of-Day Energy Service****APPLICABLE**

In the territory served.

**AVAILABILITY**

Available as an option to Customers otherwise served under Rate RS.

1. Service under this rate schedule is limited to a maximum of five hundred (500) Customers taking service on Rates RTOD-Energy and RTOD-Demand combined that are eligible for Rate RS. Company will accept Customers on a first-come-first-served basis.
2. This service is also available to Customers on Rate GS (where the Rate GS service is used in conjunction with a Rate RS service to provide service to a detached garage and energy usage is no more than 300 kWh per month) who demonstrate power delivered to such detached garage is consumed, in part, for the powering of low emission vehicles licensed for operation on public streets or highways. Such vehicles include:
  - a) battery electric vehicles or plug-in hybrid electric vehicles recharged through a charging outlet at Customer's premises,
  - b) natural gas vehicles refueled through an electric-powered refueling appliance at Customer's premises.
3. A Customer electing to take service under this rate schedule who subsequently elects to take service under Rate RS may not be allowed to return to this optional rate for twelve (12) months from the date of exiting this rate schedule.

**RATE**

Basic Service Charge per day: \$0.45

Plus an Energy Charge per kWh:	Infrastructure	Variable	Total	
Off-Peak Hours:	\$0.04887	\$0.03677	\$0.08564	/I
On-Peak Hours:	\$0.14562	\$0.03677	\$0.18239	/I

"Variable" shall be the rate comprised of costs, such as fuel, that fluctuate with the production of energy used by customers.

"Infrastructure" shall be the rate comprised of costs associated with meeting system demand that do not fluctuate directly with energy usage as well as the portion of fixed customer-related expenses not recovered in the Basic Service Charge.

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**Louisville Gas and Electric Company****Standard Rate****RTOD-Demand****Residential Time-of-Day Demand Service****APPLICABLE**

In the territory served.

**AVAILABILITY**

Available as an option to customers otherwise served under Rate RS.

1. Service under this rate schedule is limited to a maximum of five hundred (500) Customers taking service on Rates RTOD-Demand and RTOD-Energy combined that are eligible for Rate RS. Company will accept Customers on a first-come-first-served basis.
2. This service is also available as an option to Customers on Standard Rate GS (where the Rate GS service is used in conjunction with a Rate RS service to provide service to a detached garage and energy usage is no more than 300 kWh per month) who demonstrate power delivered to such detached garage is consumed, in part, for the powering of low emission vehicles licensed for operation on public streets or highways. Such vehicles include:
  - a. battery electric vehicles or plug-in hybrid electric vehicles recharged through a charging outlet at Customer's premises,
  - b. natural gas vehicles refueled through an electric-powered refueling appliance at Customer's premises.
3. A Customer electing to take service under this rate schedule who subsequently elects to take service under Rate RS may not be allowed to return to this optional rate for twelve (12) months from the date of exiting this rate schedule.

**RATE**

Basic Service Charge per day:	\$0.45			
Plus an Energy Charge per kWh:		Infrastructure	Variable	Total
		\$0.02095	\$0.03677	\$0.05772
				/I
Plus a Demand Charge per kW:				
Base Hours:	\$ 4.18			
Peak Hours:	\$ 9.16			

"Variable" shall be the rate comprised of costs, such as fuel, that fluctuate with the production of energy used by customers.

"Infrastructure" shall be the rate comprised of costs associated with meeting system demand that do not fluctuate directly with energy usage as well as the portion of fixed customer-related expenses not recovered in the Basic Service Charge.

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**Louisville Gas and Electric Company****Standard Rate****VFD****Volunteer Fire Department Service****APPLICABLE**

In all territory served.

**AVAILABILITY**

Available for single-phase delivery, in accordance with the provisions of KRS 278.172, to any volunteer fire department qualifying for aid under KRS 95A.262. Service under this rate schedule is at the option of Customer with Customer determining whether service will be provided under this schedule or any other schedule applicable to this load.

**DEFINITION**

To be eligible for this rate a volunteer fire department is defined as:

- 1) having at least 12 members and a chief;
- 2) having at least one firefighting apparatus; and
- 3) half the members must be volunteers.

**RATE**

Basic Service Charge per day: \$0.45

Plus an Energy Charge per kWh:	Infrastructure	Variable	Total	
	\$0.06927	\$0.03677	\$0.10604	/l

"Variable" shall be the rate comprised of costs, such as fuel, that fluctuate with the production of energy used by customers.

"Infrastructure" shall be the rate comprised of costs associated with meeting system demand that do not fluctuate directly with energy usage as well as the portion of fixed customer-related expenses not recovered in the Basic Service Charge.

**ADJUSTMENT CLAUSES**

The bill amount computed at the charges specified above shall be increased or decreased in accordance with the following:

Demand-Side Management Cost Recovery Mechanism	Sheet No. 86
Fuel Adjustment Clause	Sheet No. 85
Off-System Sales Adjustment Clause	Sheet No. 88
Environmental Cost Recovery Surcharge	Sheet No. 87
Franchise Fee	Sheet No. 90
School Tax	Sheet No. 91

**MINIMUM CHARGE**

The Basic Service Charge shall be the minimum charge.

**DUE DATE OF BILL**

Customer's payment will be due within sixteen (16) business days (no less than twenty-two (22) calendar days) from the date of the bill.

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Louisville Gas and Electric Company

P.S.C. Electric No. 13, Fourth Revision of Original Sheet No. 10  
Canceling P.S.C. Electric No. 13, Third Revision of Original Sheet No. 10

Standard Rate

GS

General Service

**APPLICABLE**

In all territory served.

**AVAILABILITY**

To general lighting and small power loads for secondary service.

Service under this schedule will be limited to Customers whose twelve (12)-month-average monthly maximum loads do not exceed 50 kW. Existing Customers with twelve (12)-month-average maximum monthly loads exceeding 50 kW who were receiving service under P.S.C. Electric No. 6, Fourth Revision of Original Sheet No. 10 as of February 6, 2009, will continue to be served under this rate at their option. If Customer is taking service under this rate schedule and subsequently elects to take service under another rate schedule, Customer may not again take service under this rate schedule unless and until Customer meets the Availability requirements that would apply to a new Customer.

**RATE**

Basic Service Charge per day:	\$1.16 single-phase service
	\$1.85 three-phase service

Plus an Energy Charge per kWh:	Infrastructure	Variable	Total	
	\$0.08595	\$0.03772	\$0.12367	/I

"Variable" shall be the rate comprised of costs, such as fuel, that fluctuate with the production of energy used by customers.

"Infrastructure" shall be the rate comprised of costs associated with meeting system demand that do not fluctuate directly with energy usage as well as the portion of fixed customer-related expenses not recovered in the Basic Service Charge.

**ADJUSTMENT CLAUSES**

The bill amount computed at the charges specified above shall be increased or decreased in accordance with the following:

Demand-Side Management Cost Recovery Mechanism	Sheet No. 86
Fuel Adjustment Clause	Sheet No. 85
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Environmental Cost Recovery Surcharge	Sheet No. 87
Franchise Fee	Sheet No. 90
School Tax	Sheet No. 91

**DETERMINATION OF LOAD**

Service hereunder will be metered except when, by mutual agreement of Company and Customer, an unmetered installation is more satisfactory. In the case of unmetered service, billing will be based on a calculated consumption taking into account the types of equipment served.

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**Louisville Gas and Electric Company**

P.S.C. Electric No. 13, Fourth Revision of Original Sheet No. 11 Fackler

Canceling P.S.C. Electric No. 13, Third Revision of Original Sheet No. 11

Standard Rate

GTOD-Energy

General Time-of-Day Energy Service

**APPLICABLE**

In all territory served.

**AVAILABILITY**

Available to GS Customers participating in the Demand-Side Management ("DSM") program titled Non-Residential Advanced Metering Systems Incentive on Sheet No. 86.6.

A Customer electing to take service under this rate schedule who subsequently elects to take service under the standard rate GS will not be allowed to return to this rate for 12 months from the date of exiting this rate schedule.

**RATE**

Basic Service Charge per day:	\$ 1.16 single-phase service			
	\$ 1.85 three-phase service			

Plus an Energy Charge per kWh:	Infrastructure	Variable	Total	
Off-Peak Hours	\$0.04704	\$0.03772	\$0.08476	/I
On-Peak Hours	\$0.21316	\$0.03772	\$0.25088	/I

"Variable" shall be the rate comprised of costs, such as fuel, that fluctuate with the production of energy used by customers.

"Infrastructure" shall be the rate comprised of costs associated with meeting system demand that do not fluctuate directly with energy usage as well as the portion of fixed customer-related expenses not recovered in the Basic Service Charge.

**ADJUSTMENT CLAUSES**

The bill amount computed at the charges specified above shall be increased or decreased in accordance with the following:

Demand-Side Management Cost Recovery Mechanism	Sheet No. 86
Fuel Adjustment Clause	Sheet No. 85
Off-System Sales Adjustment Clause	Sheet No. 88
Environmental Cost Recovery Surcharge	Sheet No. 87
Franchise Fee	Sheet No. 90
School Tax	Sheet No. 91

**DETERMINATION OF MAXIMUM LOAD**

The load will be measured and will be the average kW demand delivered to Customer during the 15-minute period of maximum use during the appropriate rating period each month.

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**Louisville Gas and Electric Company**

P.S.C. Electric No. 13, Fourth Revision of Original Sheet No. 12

Canceling P.S.C. Electric No. 13, Third Revision of Original Sheet No. 12

**Standard Rate****GTOD-Demand****General Time-of-Day Demand Service****APPLICABLE**

In all territory served.

**AVAILABILITY**

Available to GS Customers participating in the Demand-Side Management ("DSM") program titled Non-Residential Advanced Metering Systems Incentive on Sheet No. 86.6.

A Customer electing to take service under this rate schedule who subsequently elects to take service under the standard rate GS will not be allowed to return to this rate for 12 months from the date of exiting this rate schedule.

**RATE**

Basic Service Charge per day:	\$ 1.16 single-phase service
	\$ 1.85 three-phase service

Plus an Energy Charge per kWh:	Infrastructure	Variable	Total	
	\$0.02593	\$0.03772	\$0.06365	/I

Plus a Demand Charge per kW:	
Base Hours:	\$ 5.37
Peak Hours:	\$ 11.75

"Variable" shall be the rate comprised of costs, such as fuel, that fluctuate with the production of energy used by customers.

"Infrastructure" shall be the rate comprised of costs associated with meeting system demand that do not fluctuate directly with energy usage as well as the portion of fixed customer-related expenses not recovered in the Basic Service Charge.

**ADJUSTMENT CLAUSES**

The bill amount computed at the charges specified above shall be increased or decreased in accordance with the following:

Demand-Side Management Cost Recovery Mechanism	Sheet No. 86
Fuel Adjustment Clause	Sheet No. 85
Off-System Sales Adjustment Clause	Sheet No. 88
Environmental Cost Recovery Surcharge	Sheet No. 87
Franchise Fee	Sheet No. 90
School Tax	Sheet No. 91

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**Louisville Gas and Electric Company**

P.S.C. Electric No. 13, Third Revision of Original Sheet No. 15 Fackler

Canceling P.S.C. Electric No. 13, Second Revision of Original Sheet No. 15

**Standard Rate****PS****Power Service****APPLICABLE**

In all territory served.

**AVAILABILITY**

Available for secondary or primary service and limited to Customers whose twelve (12)-month-average monthly minimum secondary loads exceed 50 kW and whose twelve (12)-month-average monthly maximum loads do not exceed 250 kW. Secondary or primary Customers receiving service under P.S.C. of Ky. Electric No. 6, Fourth Revision of Original Sheet No. 15, Large Commercial Rate LC, and Fourth Revision of Original Sheet No. 25, Large Power Industrial Rate LP, as of February 6, 2009, with loads not meeting these criteria will continue to be served under this rate at their option. If Customer is taking service under this rate schedule and subsequently elects to take service under another rate schedule, Customer may not again take service under this rate schedule unless and until Customer meets the Availability requirements that would apply to a new Customer.

**RATE**

	Secondary	Primary	
Basic Service Charge per day:	\$2.95	\$7.89	
Plus an Energy Charge per kWh:	\$0.03874	\$0.03791	/I
Plus a Demand Charge per kW:			
Summer Rate:			
(Five Billing Periods of May through September)	\$27.57	\$24.14	
Winter Rate:			
(All other months)	\$24.28	\$21.02	

Where the monthly billing demand is the greater of:

- the maximum measured load in the current billing period but not less than 50 kW for secondary service or 25 kW for primary service, or
- a minimum of 50% of the highest measured load in the preceding eleven (11) monthly billing periods, or
- if applicable, a minimum of 60% of the contract capacity based on the maximum expected load on the system or on facilities specified by Customer.

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P.S.C. Electric No. 13, Fourth Revision of Original Sheet No. 20 Fackler

Canceling P.S.C. Electric No. 13, Third Revision of Original Sheet No. 20

**Standard Rate****TODS****Time-of-Day Secondary Service****APPLICABLE**

In all territory served.

**AVAILABILITY**

Available for secondary service to Customers whose twelve (12)-month-average monthly minimum loads exceed 250 kVA and whose twelve (12)-month-average monthly maximum loads do not exceed 5,000 kVA.

**RATE**

Basic Service Charge per day: \$ 6.58

Plus an Energy Charge per kWh: \$ 0.03470

Plus a Maximum Load Charge per kVA:

Peak Demand Period: \$ 9.70

Intermediate Demand Period: \$ 7.48

Base Demand Period: \$ 3.76

Where:

the monthly billing demand for the Peak and Intermediate Demand Periods is the greater of:

1. the maximum measured load in the current billing period, or
2. a minimum of 50% of the highest measured load in the preceding eleven (11) monthly billing periods, and

the monthly billing demand for the Base Demand Period is the greater of:

1. the maximum measured load in the current billing period but not less than 250 kVA, or
2. the highest measured load in the preceding eleven (11) monthly billing periods, or
3. the contract capacity based on the maximum load expected on the system or on facilities specified by Customer.

**ADJUSTMENT CLAUSES**

The bill amount computed at the charges specified above shall be increased or decreased in accordance with the following:

Demand-Side Management Cost Recovery Mechanism	Sheet No. 86
Fuel Adjustment Clause	Sheet No. 85
Off-System Sales Adjustment Clause	Sheet No. 88
Environmental Cost Recovery Surcharge	Sheet No. 87
Franchise Fee	Sheet No. 90
School Tax	Sheet No. 91

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**Louisville Gas and Electric Company**

P.S.C. Electric No. 13, Third Revision of Original Sheet No. 22 Fackler

**Canceling P.S.C. Electric No. 13, Second Revision of Original Sheet No. 22****Standard Rate****TODP****Time-of-Day Primary Service****APPLICABLE**

In all territory served.

**AVAILABILITY**

Available for primary service to Customers whose twelve (12)-month-average monthly minimum demands exceeding 250 kVA, and whose new or additional load receives any required approval of Company's transmission operator.

**RATE**

Basic Service Charge per day:	\$ 10.84	
Plus an Energy Charge per kWh:	\$ 0.03174	I
Plus a Maximum Load Charge per kVA:		
Peak Demand Period:	\$ 9.78	
Intermediate Demand Period:	\$ 7.49	
Base Demand Period:	\$ 2.45	

Where:

the monthly billing demand for the Peak and Intermediate Demand Periods is the greater of:

1. the maximum measured load in the current billing period, or
2. a minimum of 50% of the highest measured load in the preceding eleven (11) monthly billing periods, and

the monthly billing demand for the Base Demand Period is the greater of:

1. the maximum measured load in the current billing period but not less than 250 kVA, or
2. the highest measured load in the preceding eleven (11) monthly billing periods, or
3. the contract capacity based on the maximum expected load on the system or on facilities specified by Customer.

**ADJUSTMENT CLAUSES**

The bill amount computed at the charges specified above shall be increased or decreased in accordance with the following:

Demand-Side Management Cost Recovery Mechanism	Sheet No. 86
Fuel Adjustment Clause	Sheet No. 85
Off-System Sales Adjustment Clause	Sheet No. 88
Environmental Cost Recovery Surcharge	Sheet No. 87
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**Louisville Gas and Electric Company**

P.S.C. Electric No. 13, Fourth Revision of Original Sheet No. 25

Canceling P.S.C. Electric No. 13, Third Revision of Original Sheet No. 25

**Standard Rate****RTS****Retail Transmission Service****APPLICABLE**

In all territory served.

**AVAILABILITY**

Available for transmission service to any Customer: (1) who has a twelve (12)-month-average monthly minimum demand exceeding 250 kVA; and (2) whose new or additional load receives any required approval of Company's transmission operator.

**RATE**

Basic Service Charge per day:	\$	49.28
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Plus an Energy Charge per kWh:	\$	0.03137
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Plus a Maximum Load Charge per kVA:		
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Peak Demand Period:	\$	9.36
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Intermediate Demand Period:	\$	7.18
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Base Demand Period:	\$	1.93
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Where:

the monthly billing demand for the Peak and Intermediate Demand Periods is the greater of:

1. the maximum measured load in the current billing period, or
2. a minimum of 50% of the highest measured load in the preceding eleven (11) monthly billing periods, and

the monthly billing demand for the Base Demand Period is the greater of:

1. the maximum measured load in the current billing period but not less than 250 kVA, or
2. the highest measured load in the preceding eleven (11) monthly billing periods, or
3. the contract capacity based on the maximum expected load on the system or on facilities specified by Customer.

**ADJUSTMENT CLAUSES**

The bill amount computed at the charges specified above shall be increased or decreased in accordance with the following:

Demand-Side Management Cost Recovery Mechanism	Sheet No. 86
Fuel Adjustment Clause	Sheet No. 85
Off-System Sales Adjustment Clause	Sheet No. 88
Environmental Cost Recovery Surcharge	Sheet No. 87
Franchise Fee	Sheet No. 90
School Tax	Sheet No. 91

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**Louisville Gas and Electric Company**

Standard Rate

FLS

Fluctuating Load Service

**APPLICABLE**

In all territory served.

**AVAILABILITY**

Available for primary or transmission service to Customers up to an aggregate of two hundred (200) MVA for all Customers taking service under this schedule and under the Fluctuating Load Service Rate FLS schedule of Kentucky Utilities Company. This schedule is restricted to individual Customers whose monthly demand is twenty (20) MVA or greater. A Customer is defined as a fluctuating load if that Customer's load either increases or decreases twenty (20) MVA or more per minute or seventy (70) MVA or more in ten (10) minutes when such increases or decreases exceed one (1) occurrence per hour during any hour of the billing month.

Subject to the above aggregate limit of two hundred (200) MVA, this schedule is mandatory for all Customers whose load is defined as fluctuating and not served on another rate schedule as of July 1, 2004.

**BASE RATE**

	<u>Primary</u>	<u>Transmission</u>	
Basic Service Charge per day:	\$ 10.84	\$ 49.28	
Plus an Energy Charge per kWh:	\$ 0.03668	\$ 0.03615	/I
Plus a Maximum Load Charge per kVA:			
Peak Demand Period:	\$ 9.34	\$ 8.95	
Intermediate Demand Period:	\$ 7.10	\$ 6.76	
Base Demand Period:	\$ 2.32	\$ 1.67	

Where:

the monthly billing demand for the Peak and Intermediate Demand Periods is the greater of:

1. the maximum measured load in the current billing period, or
2. a minimum of 50% of the highest measured load in the preceding eleven (11) monthly billing periods, and

the monthly billing demand for the Base Demand Period is the greater of:

1. the maximum measured load in the current billing period but not less than 20,000 kVA, or
2. the highest measured load in the preceding eleven (11) monthly billing periods, or
3. the contract capacity based on the maximum expected load on the system or on facilities specified by Customer.

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P.S.C. Electric No. 13, Third Revision of Original Sheet No. 35 Fackler

**Canceling P.S.C. Electric No. 13, Second Revision of Original Sheet No. 35**

Standard Rate

LS

**Lighting Service****APPLICABLE**

In all territory served.

**AVAILABILITY**

Available under the conditions set out hereinafter for lighting applications such as, but not limited to, the illumination of streets, driveways, yards, lots, and other outdoor areas where secondary voltage of 120/240 is available.

Service will be provided under written contract, signed by Customer prior to service commencing, when additional facilities are required, when the installation includes new underground-fed lights, when the installation includes three (3) or more overhead-fed lights, or when Customer requests conversion to LED.

**OVERHEAD SERVICE**

Based on Customer's lighting choice, Company will furnish, own, install, and maintain the lighting unit. A basic overhead service includes lamp, fixture, photoelectric control, mast arm, and, if needed, up to 150 feet of conductor per fixture on existing wood poles (fixture only).

**RATE**

<b>Rate Code</b>	<b>Type of Fixture</b>	<b>Lumen Range</b>	<b>kW Per Light</b>	<b>Monthly Charge Fixture Only</b>	
<b>Light Emitting Diode (LED)</b>					
490	Cobra Head	5,500-8,200	0.071	\$10.53	
491	Cobra Head	13,000-16,500	0.122	12.57	
492	Cobra Head	22,000-29,000	0.194	15.94	
493	Open Bottom	4,500-6,000	0.048	9.54	
LC1	Cobra Head	2,500-4,000	0.022	9.12	
LC3	Cobra Head	4,000-6,000	0.039	9.69	
LF1	Directional (Flood)	4,500-6,000	0.030	11.95	
LF2	Directional (Flood)	14,000-17,500	0.096	13.96	
LF3	Directional (Flood)	22,000-28,000	0.175	16.44	
LF4	Directional (Flood)	35,000-50,000	0.297	23.29	
<b>Wood Pole</b>					
PL6				\$ 7.08	

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On and After XXXX XX, 2024**ISSUED BY:** /s/ Robert M. Conroy, Vice President  
State Regulation and Rates  
Louisville, Kentucky**Issued by Authority of an Order of the  
Public Service Commission in Case No.  
2023-00011 dated XXXX**

**Louisville Gas and Electric Company**

P.S.C. Electric No. 13, Third Revision of Original Sheet No. 35.1 Fackler

Canceling P.S.C. Electric No. 13, Second Revision of Original Sheet No. 35.1

Standard Rate

LS

Lighting Service

**UNDERGROUND SERVICE**

Based on Customer's lighting choice, Company will furnish, own, install, and maintain poles, fixtures, and any necessary circuitry up to 200 feet. All poles and fixtures furnished by Company will be standard stocked materials. Company may decline to install equipment and provide service thereto in locations deemed by Company as unsuitable for underground installation.

**RATE**

<b>Rate Code</b>	<b>Type of Fixture</b>	<b>Lumens Range</b>	<b>kW Per Light</b>	<b>Fixture Charge</b>
<b>Light Emitting Diode (LED)</b>				
LC2	Cobra Head	2,500-4,000	0.022	\$4.44
LC4	Cobra Head	4,000-6,000	0.039	\$4.98
496	Cobra Head	5,500-8,200	0.071	\$5.85
497	Cobra Head	13,000-16,500	0.122	\$7.90
498	Cobra Head	22,000-29,000	0.194	\$11.27
499	Colonial, 4-Sided	4,000-7,000	0.044	\$7.50
LA1	Acorn	4,000-7,000	0.040	\$7.30
LN1	Contemporary	4,000-7,000	0.057	\$7.21
LN2	Contemporary	8,000-11,000	0.087	\$8.60
LN3	Contemporary	13,500-16,500	0.143	\$10.56
LN4	Contemporary	21,000-28,000	0.220	\$15.13
LN5	Contemporary	45,000-50,000	0.380	\$21.05
LF5	Directional (Flood)	4,500-6,000	0.030	\$8.32
LF6	Directional (Flood)	14,000-17,500	0.096	\$10.32
LF7	Directional (Flood)	22,000-28,000	0.175	\$12.81
LF8	Directional (Flood)	35,000-50,000	0.297	\$19.65
LV1	Victorian	4,000-7,000	0.039	\$25.62
LL1	London	4,000-7,000	0.079	\$27.24

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2023-00011 dated XXXX**

**Louisville Gas and Electric Company**

P.S.C. Electric No. 13, Third Revision of Original Sheet No. 36 Fackler

Canceling P.S.C. Electric No. 13, Second Revision of Original Sheet No. 36

Standard Rate

RLS

**Restricted Lighting Service****APPLICABLE**

In all territory served.

**AVAILABILITY**

Availability is restricted to those lighting fixtures/poles in service as of July 1, 2021. Spot replacements will not be available for High Pressure Sodium, Metal Halide, Mercury Vapor and Incandescent rate codes.

In the event restricted fixtures/poles fail, Customer will be given the choice of having Company remove the failed fixture/pole or having Company replace the failed fixture/pole with comparable LED fixture/pole.

Units marked with an asterisk (\*) are not available for use in residential neighborhoods except by municipal authorities.

**OVERHEAD SERVICE**

Based on Customer's lighting choice, Company has furnished, installed, and maintained the lighting unit complete with lamp, fixture, photoelectric control, mast arm, and, if needed, up to 150 feet of conductor per fixture on existing wood poles (fixture only).

RATE Rate Code	Type of Fixture	Approximate Lumens	kW Per Light	Monthly Charge		
				Fixture Only	Fixture & Wood Pole	Fixture & Orn. Pole
<b>Mercury Vapor</b>						
252	Cobra/Open Bottom	8,000	0.210	\$11.97		
203	Cobra Head	13,000	0.298	13.65		
204	Cobra Head	25,000	0.462	16.84		
209	Cobra Head	60,000*	1.180	34.38		
207	Directional	25,000	0.462	\$19.07		
210	Directional	60,000*	1.180	35.68		
201	Open Bottom	4,000	0.100	\$10.27		
<b>Metal Halide</b>						
470/471	Directional	12,000	0.150	\$16.21	\$19.09	/
474/475	Directional	32,000*	0.350		25.04	\$33.05  /
476/477	Directional	107,800*	1.080	47.69	51.12	/
473	Directional	32,000*	0.350	22.58		

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**Louisville Gas and Electric Company**

P.S.C. Electric No. 13, Third Revision of Original Sheet No. 36.1

Canceling P.S.C. Electric No. 13, Second Revision of Original Sheet No. 36.1

Standard Rate

RLS

**Restricted Lighting Service**

RATE (continued) Rate Code	Type of Fixture	Approximate Lumens	kW Per Light	Monthly Charge		
				Fixture Only	Fixture & Wood Pole	Fixture & Orn. Pole
<b>High Pressure Sodium</b>						
452	Cobra Head	16,000	0.181	\$15.74		
453	Cobra Head	28,500	0.294	18.45		
454	Cobra Head	50,000*	0.471	21.21		
455	Directional	16,000	0.181	\$16.77		
456	Directional	50,000*	0.471	22.10		
457	Open Bottom	9,500	0.117	\$13.92		

**UNDERGROUND SERVICE**

Based on Customer's lighting choice, Company has furnished, installed, and maintained the lighting unit complete with lamp, fixture, photoelectric control, mast arm, and, if needed, up to 200 feet of conductor per fixture on appropriate poles.

RATE Rate Code	Type of Fixture	Approximate Lumens	kW Per Light	Monthly Charge		
				Fixture Only	Decorative Smooth	Fluted Pole
<b>High Pressure Sodium</b>						
275	Cobra/Contemporary	16,000	0.181		\$29.89	
266	Cobra/Contemporary	28,500	0.294		32.93	
267	Cobra Contemporary	50,000*	0.471		37.75	
276	Coach/Acorn	5,800	0.083		18.12	
274	Coach/Acorn	9,500	0.117		21.56	
277	Coach/Acorn	16,000	0.181		26.37	
279/278	Contemporary	120,000*	1.000	\$52.12	85.47	/
417	Acorn, Bronze	9,500	0.117		29.02	
419	Acorn, Bronze	16,000	0.180		30.40	
280	Victorian	5,800	0.083	\$24.55		
281	Victorian	9,500	0.117	25.07		
282	London	5,800	0.083	24.13		
283	London	9,500	0.117	25.61		
426/427	London	5,800	0.083		\$38.76	\$40.91  /
428/429	London	9,500	0.117		39.75	40.93  /
430/431	Victorian	5,800	0.083		37.71	38.45  /
432/433	Victorian	9,500	0.117		40.02	43.18  /

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Louisville, KentuckyIssued by Authority of an Order of the  
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2023-00011 dated XXXX

**Louisville Gas and Electric Company**

P.S.C. Electric No. 13, Third Revision of Original Sheet No. 36.2

Canceling P.S.C. Electric No. 13, Second Revision of Original Sheet No. 36.2

Standard Rate

RLS

**Restricted Lighting Service****UNDERGROUND SERVICE (continued)**

RATE	Type of Fixture	Approximate Lumens	kW Per Light	Monthly Charge		
				Fixture Only	Decorative Smooth	
<b>High Pressure Sodium (continued)</b>						
412	Colonial, 4-Sided	5,800	0.083		\$24.00	
413	Colonial, 4-Sided	9,500	0.117		24.80	
444	Colonial, 4-Sided	16,000	0.181		24.79	
415	Acorn	5,800	0.083		24.43	
416	Acorn	9,500	0.117		27.08	
445	Acorn	16,000	0.181		26.93	
400	Dark Sky	4,000	0.060		28.47	
401	Dark Sky	9,500	0.117		28.96	
423	Cobra Head	16,000	0.181		31.53	
424	Cobra Head	28,500	0.294		34.17	
425	Cobra Head	50,000*	0.471		40.68	
439/420	Contemporary	16,000	0.181	\$19.64	35.49	/
440/421	Contemporary	28,500*	0.294	21.89	38.42	/
441/422	Contemporary	50,000*	0.471	26.50	44.76	/
<b>Mercury Vapor</b>						
318	Cobra Head	8,000	0.210		\$20.57	
314	Cobra Head	13,000	0.298		23.25	
315	Cobra Head	25,000	0.462		27.22	
206	Coach	4,000	0.100		15.02	
208	Coach	8,000	0.210		17.08	
<b>Metal Halide</b>						
479/480	Contemporary	12,000	0.150	\$17.95	\$29.21	/
483/484	Contemporary	107,800*	1.080	50.89	62.77	/
481/482	Contemporary	32,000*	0.350	24.50	36.41	/
<b>Incandescent</b>						
349	Continental Jr.	1,500	0.102		\$10.78	
348	Continental Jr.	6,000	0.447		15.80	
<b>Victorian/London Bases</b>						
950	Old Town				\$ 3.88	
951	Chesapeake				4.10	
956	Victorian/London (Westchester/Norfolk)				3.97	
<b>Poles</b>						
901	10' Smooth Pole				\$11.59	
902	10' Fluted Pole				13.84	

Where Customer's location required the installation of additional facilities, Company may have furnished the requested facilities at an additional charge per month to be determined under the Excess Facilities Rider.

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**ISSUED BY:** /s/ Robert M. Conroy, Vice President  
State Regulation and Rates  
Louisville, Kentucky

**Issued by Authority of an Order of the  
Public Service Commission in Case No.  
2023-00011 dated XXXX**



**Louisville Gas and Electric Company**

Standard Rate

LE

Lighting Energy Service

**APPLICABLE**

In all territory served.

**AVAILABILITY**

Available to municipalities, county governments, divisions or agencies of the state or Federal governments, civic associations, and other public or quasi-public agencies for service to public street and highway lighting systems, where the municipality or other agency owns and maintains all street lighting equipment and other facilities on its side of the point of delivery of the energy supplied hereunder.

**RATE**

\$0.07725 per kWh

|

**ADJUSTMENT CLAUSES**

The bill amount computed at the charges specified above shall be increased or decreased in accordance with the following:

Fuel Adjustment Clause	Sheet No. 85
Off-System Sales Adjustment Clause	Sheet No. 88
Environmental Cost Recovery Surcharge	Sheet No. 87
Franchise Fee	Sheet No. 90
School Tax	Sheet No. 91

**DUE DATE OF BILL**

Customer's payment will be due within sixteen (16) business days (no less than twenty-two (22) calendar days) from the date of the bill.

**CONDITIONS OF DELIVERY**

1. Service hereunder will be metered except when, by mutual agreement of Company and Customer, an unmetered installation will be more satisfactory from the standpoint of both parties. In the case of unmetered service, billing will be based on a calculated consumption taking into account the types of equipment served.
2. The location of the point of delivery of the energy supplied hereunder and the voltage at which such delivery is effected shall be mutually agreed upon by Company and the Customer in consideration of the type and size of Customer's street lighting system and the voltage which Company has available for delivery.

**TERMS AND CONDITIONS**

Service will be furnished under Company's Terms and Conditions applicable hereto.

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Louisville, Kentucky

**Issued by Authority of an Order of the  
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**Louisville Gas and Electric Company**

Standard Rate

TE

Traffic Energy Service

**APPLICABLE**

In all territory served.

**AVAILABILITY**

Available to municipalities, county governments, divisions of the state or Federal governments or any other governmental agency for service on a 24-hour all-day every-day basis, where the governmental agency owns and maintains all equipment on its side of the point of delivery of the energy supplied hereunder. In the application of this rate each point of delivery will be considered as a separate Customer.

This service is limited to devices including, but not limited to, signals, cameras, or other traffic lights, electronic communication devices, emergency sirens, and gunshot triangulation devices.

**RATE**

Basic Service Charge per day:	\$0.13 per delivery point	
Plus an Energy Charge per kWh:	\$0.09086	I

**ADJUSTMENT CLAUSES**

The bill amount computed at the charges specified above shall be increased or decreased in accordance with the following:

Fuel Adjustment Clause	Sheet No. 85
Off-System Sales Adjustment Clause	Sheet No. 88
Environmental Cost Recovery Surcharge	Sheet No. 87
Franchise Fee	Sheet No. 90
School Tax	Sheet No. 91

**MINIMUM CHARGE**

The Basic Service Charge shall be the minimum charge.

**DUE DATE OF BILL**

Customer's payment will be due within sixteen (16) business days (no less than twenty-two (22) calendar days) from the date of the bill.

**CONDITIONS OF SERVICE**

1. Service hereunder will be metered except when, by mutual agreement of Company and Customer, an unmetered installation will be more satisfactory from the standpoint of both parties. In the case of unmetered service, billing will be based on a calculated consumption, taking into account the size and characteristics of the load, or on meter readings obtained from a similar installation.

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State Regulation and Rates  
Louisville, Kentucky

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**Louisville Gas and Electric Company**

P.S.C. Electric No. 13, Third Revision of Original Sheet No. 81 Fackler

Canceling P.S.C. Electric No. 13, Second Revision of Original Sheet No. 81

Standard Rate Pilot

OSL

**Outdoor Sports Lighting Service****APPLICABLE**

In all territory served.

**AVAILABILITY**

Available as an optional pilot program for secondary and primary service used by a Customer for lighting specifically designed for outdoor fields which are normally used for organized competitive sports. Service under this rate schedule is limited to a maximum of twenty Customers. Company will accept Customers on a first-come-first-served basis.

**RATE**

Basic Service Charge per day:	Secondary \$ 2.96	Primary \$ 7.89	
Plus an Energy Charge per kWh of:	\$ 0.03470	\$ 0.03174	/l
Plus a Maximum Load Charge per kW of:			
Peak Demand Period .....	\$ 23.14	\$ 17.17	
Base Demand Period .....	\$ 3.38	\$ 2.21	

Where:

the monthly billing demand for the Peak Demand Period is the greater of:

1. the maximum measured load in the billing period, or
2. a minimum of 50% of the highest billing demand in the preceding eleven (11) monthly billing periods.

the monthly billing demand for the Base Demand Period is the greater of:

1. the maximum measured load in the billing period, or
2. the highest measured load in the preceding eleven (11) monthly billing periods, or
3. if applicable, the contract capacity based on the maximum load expected on the system or on facilities specified by Customer.

**ADJUSTMENT CLAUSES**

The bill amount computed at the charges specified above shall be increased or decreased in accordance with the following:

Demand-Side Management Cost Recovery Mechanism	Sheet No. 86
Fuel Adjustment Clause	Sheet No. 85
Off-System Sales Adjustment Clause	Sheet No. 88
Environmental Cost Recovery Surcharge	Sheet No. 87
Franchise Fee	Sheet No. 90
School Tax	Sheet No. 91

**DATE OF ISSUE:** September 22, 2023**DATE EFFECTIVE:** With Service Rendered  
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State Regulation and Rates  
Louisville, Kentucky

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**Louisville Gas and Electric Company**

P.S.C. Electric No. 13, Second Revision of Original Sheet No. 85.1 Fackler

Canceling P.S.C. Electric No. 13, First Revision of Original Sheet No. 85.1

**Adjustment Clause****FAC****Fuel Adjustment Clause**

3. Forced Outages are all non-scheduled losses of generation or transmission which require substitute power for a continuous period in excess of six (6) hours. Where forced outages are not as a result of faulty equipment, faulty manufacture, faulty design, faulty installations, faulty operation, or faulty maintenance, but are Acts of God, riot, insurrection or acts of the public enemy, then the utility may, upon proper showing, with the approval of the Commission, include the fuel cost of substitute energy in the adjustment. Until such approval is obtained, in making the calculations of fuel cost (F) in subsection (2)(a) and (b) above, the forced outage costs to be subtracted shall be no less than the fuel cost related to the lost generation.
4. Sales (S) shall be all kWh sold, excluding inter-system sales. Where, for any reason, billed system sales cannot be coordinated with fuel costs for the billing period, sales may be equated to the sum of (i) generation, (ii) purchases, (iii) interchange in, less (iv) energy associated with pumped storage operations, less (v) inter-system sales referred to in subsection (2)(d) above, less (vi) total system losses. Utility used energy shall not be excluded in the determination of sales (S).
5. The cost of fossil fuel shall include no items other than the invoice price of fuel less any cash or other discounts. The invoice price of fuel includes the cost of the fuel itself and necessary charges for transportation of the fuel from the point of acquisition to the unloading point, as listed in Account 151 of FERC Uniform System of Accounts for Public Utilities and Licensees.
6. Base (b) period shall be January 2022 and the base fuel factor is \$0.02860 per kWh. T/I
7. Current (m) period shall be the second month preceding the month in which the Fuel Clause Adjustment Factor is billed.

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**DATE OF ISSUE:** September 22, 2023**DATE EFFECTIVE:** With Service Rendered  
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State Regulation and Rates  
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**LOUISVILLE GAS AND ELECTRIC COMPANY**

**Response to Commission Staff's First Request for Information  
Dated September 6, 2023**

**Case No. 2023-00011**

**Question No. 29**

**Responding Witness: Stuart A. Wilson**

Q-29. For the years ending October 31, 2021, and October 31, 2022, provide:

- a. Maximum annual system demand; and
- b. Average annual demand.

A-29.

- a. See the table provided below. The maximum annual system demand for the combined KU and LG&E systems is the maximum hourly observation over each 8,760 hour period.

Year Ending October 31	Maximum Annual System Demand (MW)	Average Annual Demand (MW)
2021	6,123	3,636
2022	6,187	3,638

- b. See the response to part (a). The average annual demand for the combined KU and LG&E systems is the average of all 8,760 hourly observations over each annual period.

**LOUISVILLE GAS AND ELECTRIC COMPANY**

**Response to Commission Staff's First Request for Information  
Dated September 6, 2023**

**Case No. 2023-00011**

**Question No. 30**

**Responding Witness: Andrea M. Fackler**

Q-30.

- a. Provide a schedule of the calculation of the 12-month average line loss by month for November 2020 through October 2022.
- b. Describe the actions that LG&E has taken to reduce line loss during this period.

A-30.

- a. See attached.
- b. LG&E's transmission and distribution systems are constantly being expanded and upgraded to provide reliable electric service. All enhancements contribute to a system that will operate with potentially fewer line losses. New line construction and transformer additions provide facilities which may reduce the current in existing facilities, thus allowing power the path of least resistance. Replacing existing conductors with large conductors or replacing existing transformers with larger transformers also reduce the resistance. Adding capacitors near the load reduces system reactive power (VAR) requirements and line and transformer currents. Any reduction in current and/or resistance results in reduced losses. The Company's planning and design objective is to provide a reliable transmission and distribution system at a reasonable cost. For Transmission and Distribution, the cost for losses are evaluated as outlined below.

Transmission

The cost of transmission line losses is included in the economic analysis when evaluating the cost of alternative projects. The costs of core and copper losses are incorporated into the selection of all transmission transformers.

Distribution

Losses are evaluated in the selection of standard line materials (cables, wires, distribution transformers, etc.) and distribution substation transformers. Total ownership cost, which includes the cost of no-load, load and auxiliary losses, is incorporated into the selection of distribution and substation transformers.

## Louisville Gas and Electric Company

## 12 Month Average Line Loss

## November 2020 to October 2022

Line	Month	12 Months to Date kWh Sources	12 Months to Date Overall System Losses	12 Months End Percent Losses	Current Month kWh Sources	Current Month Calculated System Losses (kWh)
a	b	c	d	e (d / c)	f	g (e * f)
1	Nov-20	11,533,549,480	538,929,854	4.67%	827,355,173	38,637,487
2	Dec-20	11,564,940,955	533,137,645	4.61%	976,081,977	44,997,379
3	Jan-21	11,593,461,077	537,061,597	4.63%	994,233,235	46,032,999
4	Feb-21	11,628,369,069	513,115,493	4.41%	939,158,444	41,416,887
5	Mar-21	11,629,389,833	526,132,188	4.52%	860,397,972	38,889,988
6	Apr-21	11,691,896,897	544,322,118	4.66%	820,451,954	38,233,061
7	May-21	11,745,273,108	561,536,420	4.78%	919,098,250	43,932,896
8	Jun-21	11,766,911,811	543,979,790	4.62%	1,115,452,839	51,533,921
9	Jul-21	11,661,728,419	517,583,577	4.44%	1,224,397,048	54,363,229
10	Aug-21	11,761,701,335	490,183,720	4.17%	1,268,480,476	52,895,636
11	Sep-21	11,805,773,679	506,191,673	4.29%	1,020,765,462	43,790,838
12	Oct-21	11,870,992,282	531,756,906	4.48%	905,119,452	40,549,351
13	Nov-21	11,905,543,196	516,091,429	4.33%	861,906,087	37,320,534
14	Dec-21	11,813,834,929	500,466,019	4.24%	884,373,710	37,497,445
15	Jan-22	11,851,180,753	508,715,406	4.29%	1,031,579,059	44,254,742
16	Feb-22	11,796,641,389	499,971,477	4.24%	884,619,080	37,507,849
17	Mar-22	11,809,275,338	510,443,296	4.32%	873,031,921	37,714,979
18	Apr-22	11,810,649,019	505,720,104	4.28%	821,825,635	35,174,137
19	May-22	11,868,281,594	498,275,084	4.20%	976,730,825	41,022,695
20	Jun-22	11,912,860,380	504,256,865	4.23%	1,160,031,625	49,069,338
21	Jul-22	11,969,136,997	519,233,173	4.34%	1,280,673,665	55,581,237
22	Aug-22	11,929,564,100	526,036,042	4.41%	1,228,907,579	54,194,824
23	Sep-22	11,912,840,366	517,948,021	4.35%	1,004,041,728	43,675,815
24	Oct-22	11,831,429,521	487,880,450	4.12%	823,708,607	33,936,795

**LOUISVILLE GAS AND ELECTRIC COMPANY**

**Response to Commission Staff's First Request for Information  
Dated September 6, 2023**

**Case No. 2023-00011**

**Question No. 31**

**Responding Witness: Charles R. Schram**

- Q-31. Describe in detail any hedging or hedging related activities that LG&E uses in relation to power purchases. Include an explanation as to whether the Commission approved the hedging activities or the utility implemented hedging pursuant to internal company policies. If the hedging was pursuant to internal policies, provide a copy of the policy and an explanation of how long the hedging activity has been ongoing.
- A-31. LG&E is not a member of a regional transmission organization ("RTO"). While the Company makes energy purchases when economics are favorable, there are no hedging activities related to these purchases.



**LOUISVILLE GAS AND ELECTRIC COMPANY**

**Response to Commission Staff's First Request for Information  
Dated September 6, 2023**

**Case No. 2023-00011**

**Question No. 32**

**Responding Witness: Delbert Billiter / Stuart A. Wilson**

- Q-32. Provide the most recent projected fuel requirements for the years 2023 and 2024 in tons for coal, MMBtu for natural gas, and dollars.
- A-32. Below is the most recent forecast of the Company's coal purchases for 2023 and 2024. Note that 2023 includes actuals through August.

	<u>Tons</u>	<u>Dollars</u>
2023	5,208,935	\$268,069,853
2024	5,857,463	\$320,264,433

Below is the most recent forecast of the Company's natural gas purchases for 2023 and 2024. Note that 2023 includes actuals through August.

	<u>MMBtu</u>	<u>Dollars</u>
2023	10,535,869	\$49,795,838
2024	12,074,496	\$56,740,722

**LOUISVILLE GAS AND ELECTRIC COMPANY**

**Response to Commission Staff's First Request for Information  
Dated September 6, 2023**

**Case No. 2023-00011**

**Question No. 33**

**Responding Witness: Andrea M. Fackler / Stuart A. Wilson**

- Q-33. Provide the most recent sales projections for the years 2023 and 2024 in kWh and dollars.
- A-33. Below is the most recent forecast of projected sales to LG&E electric ultimate consumers. Note that 2023 includes actuals through August.

	<u>Sales (kWh)</u>	<u>Dollars</u>
2023	10,967,485,723	\$1,190,455,284
2024	11,270,445,083	\$1,259,319,842

**LOUISVILLE GAS AND ELECTRIC COMPANY**

**Response to Commission Staff's First Request for Information  
Dated September 6, 2023**

**Case No. 2023-00011**

**Question No. 34**

**Responding Witness: Stuart A. Wilson**

- Q-34. Provide the planned maintenance schedule for each of the generating units for the years 2023 and 2024.
- A-34. See attached. 2023's maintenance weeks through the week of September 18, 2023 reflect actual planned outages. Certain information requested is confidential and proprietary and is being provided under seal pursuant to a petition for confidential protection.





**LOUISVILLE GAS AND ELECTRIC COMPANY**

**Response to Commission Staff's First Request for Information  
Dated September 6, 2023**

**Case No. 2023-00011**

**Question No. 35**

**Responding Witness: Delbert Billiter / Charles R. Schram / Andrea M. Fackler**

- Q-35. Identify any issues that could affect fuel costs for the two-year period that remain unresolved or unsettled. Include in the response any issues related to billings from a regional transmission operator. Consider this a continuing request to inform the Commission if LG&E becomes aware of any issues during the course of this proceeding.
- A-35. The Company has no unresolved or unsettled issues to report and will update the Commission during the course of this proceeding if it becomes aware of any issues.

**LOUISVILLE GAS AND ELECTRIC COMPANY**

**Response to Commission Staff's First Request for Information  
Dated September 6, 2023**

**Case No. 2023-00011**

**Question No. 36**

**Responding Witness: Delbert Billiter**

- Q-36. Provide the number of LG&E's coal purchase contracts that included transportation costs and those that did not from November 1, 2020, through October 31, 2022.
- a. Explain how it is determined whether transportation costs will be included in the coal purchase contract.
  - b. When transportation is contracted for separately from the coal contract, explain whether LG&E issue requests for proposals (RFP) for this service.
    - (1) If yes, state how often this occurs, how many vendors are included in the RFP, and how is it determined which vendors will receive the RFP.
    - (2) State whether LG&E uses or contracts with any related parties for transportation of its coal purchases. If yes, provide the name of the related party and nature of the relationship, the period it has contracted with the party and copies of any contracts with the related party if not previously filed with the Commission.
  - c. Explain in detail LG&E's policies and procedures for entering into transportation contracts.
- A-36. Many coal suppliers incur transportation costs in the process of mining coal and moving coal from the mine to the processing plant, and from the processing plant to the FOB Delivery Point (typically FOB railcar or FOB barge). However, it is the Company's interpretation that transportation costs, in the context of this question, refer to transportation costs for the final delivery of the coal to the power generation station from the FOB Delivery Point. Using this interpretation, the Company had no coal contracts, during the period November 1, 2020 to October 31, 2022, that included transportation costs.
- a. When the Company solicits the market for coal, it allows suppliers to make proposals at a FOB Delivery Point of the bidder's choosing. When a supplier offers coal FOB power generation station, the Company evaluates this proposal against other offers on a delivered costs basis to the power

generation station. If the cost of the offer, on a delivered basis, is lower than other options, and the supplier and their transportation provider meet all other criteria, the Company would select this offer. It is rare for a supplier to offer coal on a FOB power generation station basis.

- b. When more than one transportation vendor is available, the Company issues an RFP to acquire transportation services. When only one transportation vendor exists, as with Mill Creek Generating Station for rail deliveries, no RFP is performed.
  - (1) The frequency of transportation RFPs varies depending on the term of the existing contracts. The Company issues RFPs before existing contracts expire to identify the best transportation option ahead of the active contracts' termination date. The number of vendors varies by the services needed, but all transportation vendors capable of providing the needed services to the Company's power generation stations are included.
  - (2) The Company has no transportation contracts with any related party.
- c. The Company's procedures for entering into transportation contracts are outlined on pages 12-13 of the Coal Supply and By-Products Marketing Procurement Procedures. See the response to Question No. 11.



**LOUISVILLE GAS AND ELECTRIC COMPANY**

**Response to Commission Staff's First Request for Information  
Dated September 6, 2023**

**Case No. 2023-00011**

**Question No. 37**

**Responding Witness: Andrea M. Fackler / Charles R. Schram**

- Q-37. Explain how purchase power costs are accounted for in the calculation of the FAC when LG&E experiences a planned generation outage and purchases power to meet load (i.e., whether the entire amount of the purchase power recorded in the calculation, or there is a limit as to the amount recorded). If there is a limit, explain the basis for the limitation and how it is calculated. If there is no limit, explain the basis for including 100 percent of the purchase power costs.
- A-37. When the Company experiences a planned generation outage and purchases power to meet load, economic purchased power costs are accounted for in the calculation of the FAC. Non-economic purchased power costs (i.e., power that costs more than the Company's highest cost unit that was available to generate power), if any, are excluded from the FAC.

The inclusion of purchased power costs in the FAC is consistent with 807 KAR 5:056, which states "[f]uel costs (F) shall be the most recent actual monthly cost...of...the charges for economy energy purchases, the charges as a result of scheduled outage, and other charges for energy being purchased by the buyer to substitute for the buyer's own higher cost energy, may be included".

**LOUISVILLE GAS AND ELECTRIC COMPANY**

**Response to Commission Staff's First Request for Information  
Dated September 6, 2023**

**Case No. 2023-00011**

**Question No. 38**

**Responding Witness: Andrea M. Fackler / Charles R. Schram**

- Q-38. Explain how purchase power costs are accounted for in the calculation of the FAC when LG&E is not experiencing a generation outage and purchases power in order to meet demand (i.e., whether the entire amount of the purchase power recorded in the calculation, or there is a limit as to the amount recorded). If there is a limit, explain the basis for the limitation and how it is calculated. If there is no limit, explain the basis for including 100 percent of the purchase power costs.
- A-38. When the Company is not experiencing a generation outage and purchases power to meet load, economic purchased power costs are accounted for in the calculation of the FAC. Non-economic purchased power costs (i.e., power that costs more than what could be generated by the Company's highest cost unit that was available to generate power), if any, are excluded from the FAC.

The inclusion of purchased power costs in the FAC is consistent with 807 KAR 5:056, which states "[f]uel costs (F) shall be the most recent actual monthly cost...of...the charges for economy energy purchases, the charges as a result of scheduled outage, and other charges for energy being purchased by the buyer to substitute for the buyer's own higher cost energy, may be included".

**LOUISVILLE GAS AND ELECTRIC COMPANY**

**Response to Commission Staff’s First Request for Information  
Dated September 6, 2023**

**Case No. 2023-00011**

**Question No. 39**

**Responding Witness: Andrea M. Fackler**

- Q-39. Provide the amount, by month, of costs excluded from recovery from the FAC related to non-economy purchases.
- a. State whether LG&E otherwise recovers the excluded costs.
  - b. If LG&E does recover the excluded costs, explain in detail how those costs are recovered.
  - c. Provide the amount excluded from recovery during the review period that, if applicable, will otherwise recovered.

A-39.

	Louisville Gas and Electric						
	May-22	Jun-22	Jul-22	Aug-22	Sep-22	Oct-22	Total
Non-Economy Purchases Disallowed from Recovery in Fuel Adjustment Clause (FAC)	\$ -	\$ -	\$ 3	\$ -	\$ 47	\$ 108	\$ 158

a-c. The Company does not recover actual costs excluded from recovery in the FAC in another manner. However, the Company recovers through base rates an amount of non-economy purchases 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. The annual amount of non-economy purchase exclusion costs currently embedded in base rates is \$4,3471. This amount will not change until new base rates are established in a future base rate case proceeding.

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<sup>1</sup> *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 Metering Infrastructure, Approval of Certain Regulatory and Accounting Treatments, and Establishment of a One-Year Surcredit*, Case No. 2020-00350, Order issued June 30, 2021 establishing base rates effective July 1, 2021.

**LOUISVILLE GAS AND ELECTRIC COMPANY**

**Response to Commission Staff's First Request for Information  
Dated September 6, 2023**

**Case No. 2023-00011**

**Question No. 40**

**Responding Witness: Andrea M. Fackler**

Q-40. Provide the amount of current FAC fuel procurement or purchase power costs that is included in LG&E's base rates.

A-40. Pursuant to 807 KAR 5:056, Section 1(3), LG&E's FAC recoverable costs are primarily recovered through energy base rates, which contain an embedded fuel rate approved by the Commission. Any variance between the fuel base rate and the actual fuel cost for an expense month is charged to/credited to customers through a FAC adjustment on a customer's bill two months later. LG&E's current fuel base rate was approved by the Commission in Case No. 2021-00056. Importantly, there are also non-fuel components to the base energy rate and for some tariffs, there is an environmental cost recovery component embedded in the base energy rate. The non-fuel component is established or revised during a base rate proceeding while the environmental cost recovery ("ECR") component is established or revised during a base rate proceeding (e.g., if projects are being eliminated into base rates) or during an ECR adjustment clause two-year review proceeding (e.g., if costs are rolled into base rates to be collected through base rates rather than the ECR surcharge).

Additionally, when preparing a base rate case application, LG&E removes all FAC recoverable costs and revenues since they have separate reporting requirements with the Commission. See also the response to Question No. 41.

**LOUISVILLE GAS AND ELECTRIC COMPANY**

**Response to Commission Staff's First Request for Information  
Dated September 6, 2023**

**Case No. 2023-00011**

**Question No. 41**

**Responding Witness: Andrea Fackler**

- Q-41. Provide the amount of non-FAC fuel procurement or purchase power costs that are otherwise recovered in LG&E's base rates.
- A-41. Pursuant to 807 KAR 5:056, Section 1(4) and past Commission Orders, LG&E is subject to two potential cost disallowances for fuel adjustment clause purposes. The first potential disallowance is when forced outages occur and the Company has to purchase or generate any lost power. If those fuel costs exceed the cost of the fuel costs had the power been generated by the unit forced out, the fuel costs are not recoverable through the FAC. The second potential disallowance is for power purchases made that exceed the fuel costs for the Company's highest cost generating unit available to serve load during the month. Any costs above this threshold are not recoverable through the FAC. As discussed in the response to Question No. 39, the Company reviews historical actual FAC exclusions when preparing its annual business plan, which is also what is used for base rate case applications. Currently, a three-year historical average of actual FAC exclusions is included for recovery in base rates. The annual jurisdictional amount of both forced outage and purchases above highest cost units exclusion amounts currently embedded in base rates is \$188,638<sup>2</sup>. This amount will not change until new base rates are established in a future base rate case proceeding.

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<sup>2</sup> *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 Metering Infrastructure, Approval of Certain Regulatory and Accounting Treatments, and Establishment of a One-Year Surcredit, Case No. 2020-00350, Order issued June 30, 2021 establishing base rates effective July 1, 2021.*