

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF KENTUCKY	)	
UTILITIES COMPANY FOR A CERTIFICATE	)	
OF PUBLIC CONVENIENCE AND NECESSITY	)	CASE NO.
AND APPROVAL OF AMENDMENT TO ITS	)	2017-00483
2016 COMPLIANCE PLAN FOR RECOVERY	)	
BY ENVIRONMENTAL SURCHARGE	)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO  
KENTUCKY UTILITIES COMPANY

Kentucky Utilities Company ("KU"), pursuant to 807 KAR 5:001, is to file with the Commission the original in paper medium and an electronic version of the following information. The information requested herein is due on or before March 26, 2018. Responses to requests for information in paper medium shall be appropriately bound, tabbed, and indexed. Each response shall include the name of the witness responsible for responding to the questions related to the information provided.

Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

KU shall make timely amendment to any prior response if it obtains information that indicates that the response was incorrect when made or, though correct when made,

is now incorrect in any material respect. For any request to which KU fails or refuses to furnish all or part of the requested information, it shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When filing a paper containing personal information, KU shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to the Application, page 5, paragraph 8.
  - a. Provide the estimated final depth of Coal Combustion Residual (“CCR”) material to be placed in the proposed smaller version of Phase II.
  - b. Provide the height of the remaining surface area after the cap and closure is completed.
2. Refer to the Application, page 6, paragraph 11. Provide the status of any necessary permit modifications or construction permits.
3. Refer to the Direct Testimony of Robert M. Conroy (“Conroy Testimony”), page 7. Provide the CCR projections originally used for Project 36, and the current forecast for CCR production by generating unit for the projected remaining life of coal-fired generation at Brown.
4. Refer to the Conroy Testimony, page 10.
  - a. Explain why KU is proposing an amortization period that aligns with Project 39 instead of Projects 40-42.

b. Explain the issues and concerns that a third amortization period would create for KU.

c. Provide the impact on ratepayers if a ten- or twenty-five year amortization period were to be authorized versus an eight-year amortization period. Provide any calculations in Excel spreadsheet format with formulas intact and unprotected and all rows and columns accessible.

5. Refer to Exhibit RMC-3, pages 2 and 4 of 4. Explain why operating expenses include additions for lines labeled “Less depreciation on retired plant” and “Less amortization on retired plant” respectively (emphasis added).

6. Refer to the Direct Testimony of R. Scott Straight (“Straight Testimony”), page 4.

a. Explain whether the CCR material that was placed in the Auxiliary CCR Impoundment due to the delay in receiving the operating permit remains in the impoundment.

b. Provide the total capacity of the Auxiliary CCR Impoundment, the current amount of CCR material in the impoundment, and the estimated date KU will reach the capacity of the impoundment.

c. State whether it is still KU’s intent to close the Auxiliary CCR Impoundment by the end of 2023.

7. Refer to the Straight Testimony, page 5. Confirm that the estimated 2.5 million cubic yards storage capacity in the Brown CCR landfill represents the total CCR storage for the landfill, and not the storage capacity requirement for the remaining life of coal-fired generation at Brown.

8. Refer to the Straight Testimony, page 6. Describe the cap-and-closure process proposed in Amended Project 36, and how it differs from the original plan.

9. Refer to the Direct Testimony of Gary H. Revlett, page 3. Confirm that the draft proposal for amendments to the Disposal of Coal Combustion Residuals from Electric Utilities final rule signed March 1, 2018, is not expected to impact the timing or design requirements of Amended Project 36.

10. Refer to the Direct Testimony of Stuart A. Wilson ("Wilson Testimony"), page 3. Provide the time frame necessary to produce 130 thousand cubic yards of CCR material.

11. Refer to the Stuart Testimony, page 4.

a. Explain the beneficial use of 100 thousand cubic yards of CCR material used to close the Auxiliary Pond and to construct Phase II.

b. Provide the status of the beneficial reuse agreement.

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*For*   
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Public Service Commission  
P.O. Box 615  
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DATED MAR 08 2018

cc: Parties of Record

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