



RECEIVED

APR 04 2018

PUBLIC SERVICE
COMMISSION

Jeff D. Cline, Manager – Annual Report Branch
Public Service Commission of Kentucky
Division of Filings
211 Sower Boulevard
P.O. Box 615
Frankfort, Kentucky 40602-0615

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

Derek A. Rahn
Manager - Revenue
Requirement/COS
T 502-627-4127
F 502-217-4002
derek.rahn@lge-ku.com

April 4, 2018

**Re: Annual Resource Assessment Filing for Kentucky Utilities
Company Pursuant to Administrative Case No. 387**

Dear Mr. Cline:

Enclosed, in accordance with Ordering Paragraph (2) of the Commission's Order in Administrative Case 387, dated October 7, 2005, are an original and ten (10) copies of the 2017 Annual Resource Assessment Filing for Kentucky Utilities Company, along with a Petition for Confidential Protection regarding certain information provided in response to Item Nos. 11 and 14.

Additionally, in response to your letter dated May 31, 2013, which requested a discussion regarding the consideration given to price elasticity in the forecasted demand, energy, and reserve margin information submitted with the annual Administrative Case No. 2000-387 resource assessments. The discussion is provided following Item No. 14.

Sincerely,

Derek A. Rahn

RECEIVED

APR 04 2018

**PUBLIC SERVICE
COMMISSION**

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY

In the Matter of:

| | | |
|---------------------------------------|---|-----------------------|
| A REVIEW OF THE ADEQUACY OF |) | |
| KENTUCKY'S GENERATION CAPACITY |) | ADMINISTRATIVE |
| AND TRANSMISSION SYSTEM |) | CASE NO. 387 |

**2017 ANNUAL RESOURCE ASSESSMENT FILING
OF
KENTUCKY UTILITIES COMPANY
PURSUANT TO APPENDIX G
OF THE COMMISSION'S ORDER
DATED DECEMBER 20, 2001
AS AMENDED BY THE
COMMISSION'S ORDER
DATED MARCH 29, 2004**

FILED: APRIL 2018

VERIFICATION

COMMONWEALTH OF KENTUCKY)
) SS:
COUNTY OF JEFFERSON)

The undersigned, **Delyn Kilpack**, being duly sworn, deposes and says that she is Manager – Transmission Strategy and Planning for LG&E and KU Services Company, and that she has personal knowledge of the matters set forth in the responses for which she is identified as the witness, and the answers contained therein are true and correct to the best of her information, knowledge and belief.



Delyn Kilpack

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 22 day of March 2018.



Notary Public (SEAL)

My Commission Expires:
JUDY SCHOOLER
Notary Public, State at Large, KY
My commission expires July 11, 2018
Notary ID # 512743



VERIFICATION

COMMONWEALTH OF KENTUCKY)
) SS:
COUNTY OF JEFFERSON)

The undersigned, **Ashley M. Moore**, being duly sworn, deposes and says that she is Manager – Transmission Policy and Tariffs for LG&E and KU Services Company, and that she has personal knowledge of the matters set forth in the responses for which she is identified as the witness, and the answers contained therein are true and correct to the best of her information, knowledge and belief.

Ashley M. Moore
Ashley M. Moore

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 22nd day of March 2018.



Judy Schooler (SEAL)
Notary Public

My Commission Expires:
JUDY SCHOOLER
Notary Public, State at Large, KY
My commission expires July 11, 2018
Notary ID # 512743

VERIFICATION

COMMONWEALTH OF KENTUCKY)
) SS:
COUNTY OF JEFFERSON)

The undersigned, **Michael S. Sebourn**, being duly sworn, deposes and says that he is Manager – Generation Planning for LG&E and KU Services Company, and that he has personal knowledge of the matters set forth in the responses for which he is identified as the witness, and the answers contained therein are true and correct to the best of his information, knowledge and belief.

Michael S. Sebourn

Michael S. Sebourn

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 22nd day of March 2018.

Judy Schouler

Notary Public (SEAL)



My Commission Expires:
JUDY SCHOULER
Notary Public, State at Large, KY
My commission expires July 11, 2018
Notary ID # 512743

VERIFICATION

COMMONWEALTH OF KENTUCKY)
) SS:
COUNTY OF JEFFERSON)

The undersigned, **Richard M. Smith**, being duly sworn, deposes and says that he is Manager – Sales Analysis and Forecast for LG&E and KU Services Company, and that he has personal knowledge of the matters set forth in the responses for which he is identified as the witness, and the answers contained therein are true and correct to the best of his information, knowledge and belief.


Richard M. Smith

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 22nd day of March 2018.


Notary Public (SEAL)



My Commission Expires:
JUDY SCHOOLER
Notary Public, State at Large, KY
My commission expires July 11, 2018
Notary ID # 512743

KENTUCKY UTILITIES COMPANY

**2017 ANNUAL RESOURCE ASSESSMENT FILING
PURSUANT TO APPENDIX G OF THE COMMISSION'S ORDER
DATED DECEMBER 20, 2001, IN ADMINISTRATIVE CASE NO. 387
AS AMENDED BY THE COMMISSION'S ORDER DATED MARCH 29, 2004
FILED APRIL 2018**

ITEM NO. 1

The information originally requested in Item 1 of Appendix G of the Commission's Order dated December 20, 2001, in Administrative Case No. 387, is no longer required pursuant to the Commission's Order of March 29, 2004, amending the previous Order.

KENTUCKY UTILITIES COMPANY

**2017 ANNUAL RESOURCE ASSESSMENT FILING
PURSUANT TO APPENDIX G OF THE COMMISSION'S ORDER
DATED DECEMBER 20, 2001, IN ADMINISTRATIVE CASE NO. 387
AS AMENDED BY THE COMMISSION'S ORDER DATED MARCH 29, 2004
FILED APRIL 2018**

ITEM NO. 2

The information originally requested in Item 2 of Appendix G of the Commission's Order dated December 20, 2001, in Administrative Case No. 387, is no longer required pursuant to the Commission's Order of March 29, 2004, amending the previous Order.

KENTUCKY UTILITIES COMPANY

**2017 ANNUAL RESOURCE ASSESSMENT FILING
PURSUANT TO APPENDIX G OF THE COMMISSION'S ORDER
DATED DECEMBER 20, 2001, IN ADMINISTRATIVE CASE NO. 387
AS AMENDED BY THE COMMISSION'S ORDER DATED MARCH 29, 2004
FILED APRIL 2018**

ITEM NO. 3

RESPONDENT: Richard Smith / Michael Sebourn

3. Actual and weather-normalized monthly coincident peak demands for the just completed calendar year. Demands should be disaggregated into (a) native load demand (firm and non-firm) and (b) off-system demand (firm and non-firm).

Response:

See attached Table KU-3, which shows the actual and weather-normalized native KU peak demands. The normalized native KU stand-alone peak demands are available only on a seasonal (summer/winter) basis.

**TABLE KU-3
NATIVE AND OFF-SYSTEM DEMANDS BY MONTH FOR 2017**

Kentucky Utilities

| Time of Monthly Native Peak | Actual | | | Normal Weather (Seasonal) | Off-System (1) | | |
|-----------------------------|-------------|----------|-------|------------------------------|----------------|----------|-------|
| | Native Peak | Non-Firm | Firm | Native Peak | Firm | Non-Firm | Total |
| 1/8/2017 9:00 | 4,004 | 0 | 4,004 | 4,506 | 0 | 702 | 702 |
| 2/10/2017 8:00 | 3,630 | 0 | 3,630 | | 0 | 0 | 0 |
| 3/16/2017 7:00 | 3,815 | 0 | 3,815 | | 0 | 207 | 207 |
| 4/20/2017 16:00 | 2,906 | 0 | 2,906 | | 0 | 50 | 50 |
| 5/18/2017 15:00 | 3,346 | 0 | 3,346 | | 0 | 265 | 265 |
| 6/13/2017 14:00 | 3,710 | 0 | 3,710 | | 0 | 24 | 24 |
| 7/21/2017 17:00 | 3,914 | 0 | 3,914 | 4,081 | 0 | 2 | 2 |
| 8/17/2017 15:00 | 3,783 | 0 | 3,783 | | 0 | 24 | 24 |
| 9/27/2017 16:00 | 3,518 | 0 | 3,518 | | 0 | 6 | 6 |
| 10/9/2017 16:00 | 3,002 | 0 | 3,002 | | 0 | 151 | 151 |
| 11/20/2017 8:00 | 3,318 | 0 | 3,318 | | 0 | 0 | 0 |
| 12/28/2017 9:00 | 3,961 | 0 | 3,961 | | 0 | 302 | 302 |

Notes

(1) The allocation of off-system sales split between LG&E and KU is handled in the After-the-Fact Billing process in accordance with the Power Supply System Agreement between LG&E and KU. The individual company sales will include an allocation of the sales sourced with purchased power and allocated to the individual company based on each company's contribution to off-system sales.

KENTUCKY UTILITIES COMPANY

**2017 ANNUAL RESOURCE ASSESSMENT FILING
PURSUANT TO APPENDIX G OF THE COMMISSION'S ORDER
DATED DECEMBER 20, 2001, IN ADMINISTRATIVE CASE NO. 387
AS AMENDED BY THE COMMISSION'S ORDER DATED MARCH 29, 2004
FILED APRIL 2018**

ITEM NO. 4

RESPONDENT: Richard Smith

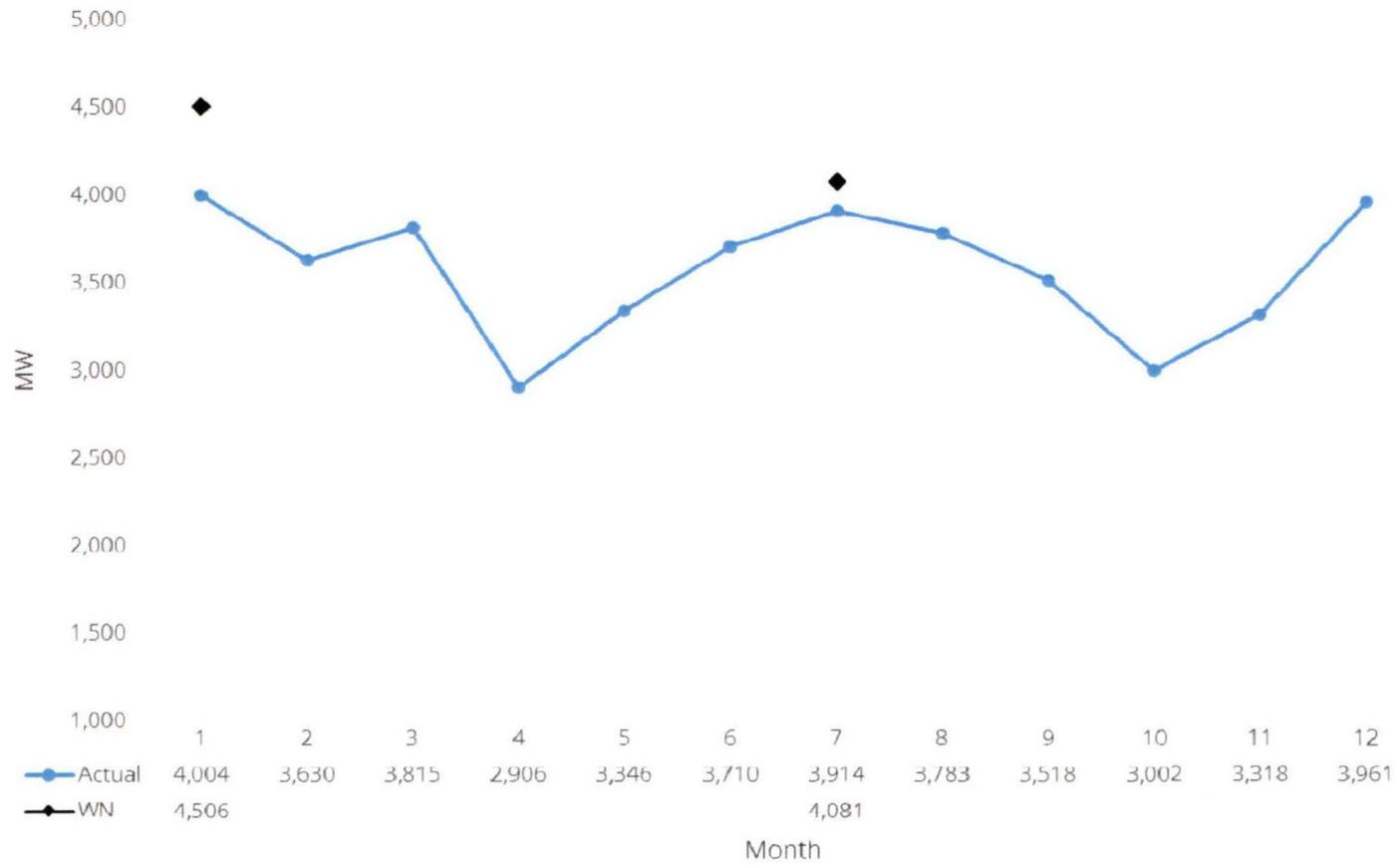
4. Load shape curves that show actual peak demands and weather-normalized peak demands (native load demand and total demand) on a monthly basis for the just completed calendar year.

Response:

See attached Figure KU-4.

Figure KU-4

KU 2017
Actual and Weather Normalized Seasonal Peak



KENTUCKY UTILITIES COMPANY

**2017 ANNUAL RESOURCE ASSESSMENT FILING
PURSUANT TO APPENDIX G OF THE COMMISSION'S ORDER
DATED DECEMBER 20, 2001, IN ADMINISTRATIVE CASE NO. 387
AS AMENDED BY THE COMMISSION'S ORDER DATED MARCH 29, 2004
FILED APRIL 2018**

ITEM NO. 5

The information originally requested in Item 5 of Appendix G of the Commission's Order dated December 20, 2001, in Administrative Case No. 387, is no longer required pursuant to the Commission's Order of March 29, 2004, amending the previous Order.

KENTUCKY UTILITIES COMPANY

**2017 ANNUAL RESOURCE ASSESSMENT FILING
PURSUANT TO APPENDIX G OF THE COMMISSION'S ORDER
DATED DECEMBER 20, 2001, IN ADMINISTRATIVE CASE NO. 387
AS AMENDED BY THE COMMISSION'S ORDER DATED MARCH 29, 2004
FILED APRIL 2018**

ITEM NO. 6

RESPONDENT: Richard Smith / Michael Sebourn

6. Based on the most recent demand forecast, the base case demand and energy forecasts and high case demand and energy forecasts for the current year and the following four years. The information should be disaggregated into (a) native load (firm and non-firm demand) and (b) off-system load (both firm and non-firm demand).

Response:

- a) See attached Table KU-6a. The values in Table KU-6a reflect the impact of the Companies Energy Efficiency programs.
- b) Off-system sales ("OSS") projections for 2018-2022 contained in the attached Table KU-6b are based on the combined Companies' current plan. For OSS, only base case total sales energy projections exist for 2018-2022. The projections consist of the expected market sales, denoted as "Wholesale OSS." All OSS are non-firm.

Table KU-6a
Kentucky Utilities
Demand and Energy Forecasts

| | 2018 | 2019 | 2020 | 2021 | 2022 |
|--|-------------|-------------|-------------|-------------|-------------|
| Base Case Energy Sales (GWh) | 20,466 | 19,491 | 19,031 | 18,979 | 18,967 |
| High Case Energy Sales (GWh) | 21,035 | 20,059 | 19,619 | 19,655 | 19,767 |
| | | | | | |
| Base Case Energy Requirements (GWh) | 21,819 | 20,780 | 20,288 | 20,233 | 20,220 |
| High Case Energy Requirements (GWh) | 22,425 | 21,385 | 20,914 | 20,954 | 21,073 |
| | | | | | |
| Base Case Native Peak Demand (MW) | 4,356 | 4,346 | 4,094 | 4,081 | 4,079 |
| High Case Native Peak Demand (MW) | 4,477 | 4,473 | 4,220 | 4,226 | 4,251 |

Table KU-6b
Combined Companies
Total Base Case Off-System Sales Energy Projection

| | 2018 | 2019 | 2020 | 2021 | 2022 |
|----------------------------|-------------|-------------|-------------|-------------|-------------|
| Existing OSS (GWh) | 0 | 0 | 0 | 0 | 0 |
| Wholesale OSS (GWh) | 150 | 109 | 236 | 397 | 475 |
| Total OSS (GWh) | 150 | 109 | 236 | 397 | 475 |

KENTUCKY UTILITIES COMPANY

**2017 ANNUAL RESOURCE ASSESSMENT FILING
PURSUANT TO APPENDIX G OF THE COMMISSION'S ORDER
DATED DECEMBER 20, 2001, IN ADMINISTRATIVE CASE NO. 387
AS AMENDED BY THE COMMISSION'S ORDER DATED MARCH 29, 2004
FILED APRIL 2018**

ITEM NO. 7

RESPONDENT: Michael Sebourn

7. The target reserve margin currently used for planning purposes, stated as a percentage of demand. If changed from what was in use in 2001, include a detailed explanation for the change.

Response:

As part of the 2014 Integrated Resource Plan ("2014 IRP"), the Companies established an optimal reserve margin range of 16% to 21%, with 16% used for planning purposes. The range provides an optimum level of reliability through various system operating conditions. The 2014 IRP was filed with the Commission in April 2014.

A detailed explanation of the current target reserve margin is documented in the report titled, "2014 Reserve Margin Study," included in Volume III of the Companies' 2014 IRP.

KENTUCKY UTILITIES COMPANY

**2017 ANNUAL RESOURCE ASSESSMENT FILING
PURSUANT TO APPENDIX G OF THE COMMISSION'S ORDER
DATED DECEMBER 20, 2001, IN ADMINISTRATIVE CASE NO. 387
AS AMENDED BY THE COMMISSION'S ORDER DATED MARCH 29, 2004
FILED APRIL 2018**

ITEM NO. 8

RESPONDENT: Michael Sebourn

8. Projected reserve margins stated in megawatts and as a percentage of demand for the current year and the following 4 years. Identify projected deficits and current plans for addressing these. For each year identify the level of firm capacity purchases projected to meet native load demand.

Response:

See attached Table KU-8. The Companies will monitor load requirements and evaluate supply alternatives to address future capacity deficits.

**Table KU-8
Combined Companies
Reserve Margin Needs (MW)**

| | 2018 | 2019 | 2020 | 2021 | 2022 |
|---|-------------|-------------|-------------|-------------|-------------|
| Peak Load | 7,047 | 6,761 | 6,749 | 6,725 | 6,725 |
| DSM at Peak Hour | -374 | -343 | -327 | -323 | -320 |
| Net Load* | 6,673 | 6,418 | 6,422 | 6,402 | 6,405 |
| | | | | | |
| Existing Capability | 7,841 | 7,570 | 7,570 | 7,571 | 7,571 |
| Bluegrass Capacity Purchase and Tolling Agreement | 165 | 0 | 0 | 0 | 0 |
| OVEC Purchase | 152 | 152 | 152 | 152 | 152 |
| CSR/Interrupt | 138 | 138 | 138 | 138 | 138 |
| Total Supply | 8,296 | 7,860 | 7,860 | 7,861 | 7,861 |
| | | | | | |
| MW Margin | 1,623 | 1,442 | 1,438 | 1,459 | 1,456 |
| Reserve Margin % | 24.3% | 22.5% | 22.4% | 22.8% | 22.7% |
| | | | | | |
| Capacity Need for 16% | (555) | (415) | (410) | (435) | (431) |
| | | | | | |
| *Sum of individual values may not match totals due to rounding. | | | | | |

KENTUCKY UTILITIES COMPANY

**2017 ANNUAL RESOURCE ASSESSMENT FILING
PURSUANT TO APPENDIX G OF THE COMMISSION'S ORDER
DATED DECEMBER 20, 2001, IN ADMINISTRATIVE CASE NO. 387
AS AMENDED BY THE COMMISSION'S ORDER DATED MARCH 29, 2004
FILED APRIL 2018**

ITEM NO. 9

The information originally requested in Item 9 of Appendix G of the Commission's Order dated December 20, 2001, in Administrative Case No. 387, is no longer required pursuant to the Commission's Order of March 29, 2004, amending the previous Order.

KENTUCKY UTILITIES COMPANY

**2017 ANNUAL RESOURCE ASSESSMENT FILING
PURSUANT TO APPENDIX G OF THE COMMISSION'S ORDER
DATED DECEMBER 20, 2001, IN ADMINISTRATIVE CASE NO. 387
AS AMENDED BY THE COMMISSION'S ORDER DATED MARCH 29, 2004
FILED APRIL 2018**

ITEM NO. 10

The information originally requested in Item 10 of Appendix G of the Commission's Order dated December 20, 2001, in Administrative Case No. 387, is no longer required pursuant to the Commission's Order of March 29, 2004, amending the previous Order.

KENTUCKY UTILITIES COMPANY

**2017 ANNUAL RESOURCE ASSESSMENT FILING
PURSUANT TO APPENDIX G OF THE COMMISSION'S ORDER
DATED DECEMBER 20, 2001, IN ADMINISTRATIVE CASE NO. 387
AS AMENDED BY THE COMMISSION'S ORDER DATED MARCH 29, 2004
FILED APRIL 2018**

ITEM NO. 11

RESPONDENT: Michael Sebourn

11. A list that identifies scheduled outages or retirements of generating capacity during the current year and the following four years.

Response:

The planned maintenance outage schedule for 2018 through 2022 is being provided pursuant to a Petition for Confidential Protection. The schedule is regularly modified based on actual operating conditions, forced outages, changes in the schedule required to meet environmental compliance regulations, fluctuations in wholesale prices, and other unforeseen events.

On November 14, 2017, KU announced plans to retire Units 1 and 2 at the Brown Generating Station in February 2019.

KENTUCKY UTILITIES COMPANY

**2017 ANNUAL RESOURCE ASSESSMENT FILING
PURSUANT TO APPENDIX G OF THE COMMISSION'S ORDER
DATED DECEMBER 20, 2001, IN ADMINISTRATIVE CASE NO. 387
AS AMENDED BY THE COMMISSION'S ORDER DATED MARCH 29, 2004
FILED APRIL 2018**

ITEM NO. 12

RESPONDENT: Michael Sebourn

12. Identify all planned base load or peaking capacity additions to meet native load requirements over the next 10 years. Show the expected in-service date, size and site for all planned additions. Include additions planned by the utility, as well as those by affiliates, if constructed in Kentucky or intended to meet load in Kentucky.

Response:

The Companies jointly plan their generation portfolio. LG&E and KU do not currently forecast a need for additional generating capacity in the next 10 years.

KENTUCKY UTILITIES COMPANY

**2017 ANNUAL RESOURCE ASSESSMENT FILING
PURSUANT TO APPENDIX G OF THE COMMISSION'S ORDER
DATED DECEMBER 20, 2001, IN ADMINISTRATIVE CASE NO. 387
AS AMENDED BY THE COMMISSION'S ORDER DATED MARCH 29, 2004
FILED APRIL 2018**

ITEM NO. 13

RESPONDENT: Ashley Moore

13. The following transmission energy data for the just completed calendar year and the forecast for the current year and the following four years:
- a. Total energy received from all interconnections and generation sources connected to the transmission system.
 - b. Total energy delivered to all interconnections on the transmission system.
 - c. Peak load capacity of the transmission system.
 - d. Peak demand for summer and winter seasons on the transmission system.

Response:

Data exists for 2017. The Company does not forecast this type of data; therefore no forecast exists for 2017-2020.

- a. LG&E and KU operate as a single NERC Balancing Area that contains several generators not owned by LG&E and KU; the non-Company owned facilities are also included as sources below:

| | |
|-----------------------------|---------------|
| Tie Lines Received (MWH) | 19,320,864 |
| Net Generation-LG&E (MWH) | 14,017,593 |
| Net Generation-KU (MWH) | 20,641,600 |
| Net Received from OMU (MWH) | 1,785,438 |
| Net Generation-KMPA (MWH) | 25,133 |
| Net Generation-EKPC (MWH) | <u>80,151</u> |
| Total Sources (MWH) | 55,870,779 |

- b. LG&E and KU operate as a single Balancing Area; the amount of energy delivered at the interconnections of the single Balancing Area was 20,990,720 MWH(s).

- c. There is no set number for peak load capacity for the transmission system. The system is built to support Network Service and firm PTP customers in accordance with the LG&E/KU Transmission Planning Guidelines. Actual transmission capacity available for Network Customers, import, export or thru-flow will vary depending on which facilities (generation, load or transmission) in the interconnected transmission system of the eastern interconnect are connected and operated at any given time.
- d. The maximum summer peak transmission load for the combined LG&E/KU transmission system was 7,319 MW for the peak hour of 7/21/17 at 3:00 PM.

The maximum winter peak transmission load for the combined LG&E/KU transmission system was 6,430 MW for the peak hour of 1/6/17 at 7:00 PM.

KENTUCKY UTILITIES COMPANY

**2017 ANNUAL RESOURCE ASSESSMENT FILING
PURSUANT TO APPENDIX G OF THE COMMISSION'S ORDER
DATED DECEMBER 20, 2001, IN ADMINISTRATIVE CASE NO. 387
AS AMENDED BY THE COMMISSION'S ORDER DATED MARCH 29, 2004
FILED APRIL 2018**

ITEM NO. 14

RESPONDENT: Delyn Kilpack

14. Identify all planned transmission capacity additions for the next 10 years. Include the expected in-service date, size and site for all planned additions and identify the transmission need each addition is intended to address.

Response:

The requested information is being provided pursuant to a Petition for Confidential Protection.

**Discussion Regarding the Consideration Given to Price Elasticity in the
Forecasted Demand, Energy and Reserve Margin Information
Provided with Annual Resource Assessment Filings
2018**

Price elasticity of demand is a direct input into the Louisville Gas and Electric Company and Kentucky Utilities Company (collectively “the Companies”) Residential and General Service (small commercial) forecast models. These models use Itron’s Statistically Adjusted End Use (“SAE”) Models. The elasticity coefficients used in the SAE models are applicable to shorter-term forecasting (up to 10 years). Over the longer-term, the implied elasticity estimate increases (in absolute value) in the SAE models due to assumed improvements in the efficiencies and saturations of appliances and other equipment to appropriately adjust demand.

In developing the elasticity coefficients, the Companies have consulted multiple sources to better understand how customers respond to electricity prices. These sources include ITRON, available studies¹, and our small commercial customers. The Companies’ price elasticity of demand coefficients are consistent with the ranges cited in the studies. Sources do not indicate any recent change in customer response to electricity prices but the Companies continue to monitor new research and data. Specifically, EPRI research states that the “effect of including recent information covering a period of rising prices appears to be minimal.”

Currently, the Companies use an elasticity coefficient of -0.1 for the Residential forecast. Below, the residential price elasticity of demand is applied in a simple example to determine the impact on customer usage for a hypothetical customer, price, and price increase.

Inputs

Electricity Price: \$0.08/kWh

Monthly customer usage: 1,000 kWh

Price increase: 5%

Price Elasticity of demand: -0.1

Formula

(price elasticity of demand) = (% change in quantity demanded) / (% change in price)

Restated as:

(% change in quantity demanded) = (% change in price) x (price elasticity of demand)

Results

Completing the equation based on the inputs above:

¹ “Regional Differences in the Price-Elasticity of Demand for Energy” by M.A. Bernstein and J. Griffin, RAND Corporation for NREL (2006); “Price Responsiveness in the AEO2003 NEMS Residential and Commercial Buildings Sector Models” by S. Wade, Energy Information Administration (2005); “Price Elasticity of Demand for Electricity: A Primer and Synthesis” by B. Neenan, EPRI (2007) ; “Trends in Regional U.S. Electricity and Natural Gas Price Elasticity” by V. Niemeyer, EPRI (2010); “A Global Survey of Electricity Demand Elasticities” by C. Dahl was presented at the 34th IAEE International Conference: Institutions, Efficiency, and Evolving Energy Technologies in June 2011 at the Stockholm School of Economics in Sweden.

$$(\% \text{ change in quantity demanded}) = (.05) \times (-0.1) = -0.005 = -0.5\%$$

Therefore, the revised monthly customer usage is 0.5% less than 1,000 kWh, or 995 kWh per month.

For small commercial customers, the Companies currently use a price elasticity of demand of -0.05. The Companies' discussions with small commercial customers indicate that these customers will attempt to pass along higher costs for electricity in the price of their goods and services. These customers typically noted that they have few options for changing their use of energy after upgrading lighting and climate control to increase efficiency.

The Companies' forecasts for Large Commercial and Industrial customers also consider how customers respond to energy prices, but these forecasts do not use the SAE models to incorporate explicit price elasticity of demand coefficients. Instead, the Companies' forecast the largest customers' energy and demand on an individual basis and use specific industry indices for others. Recognizing that customers may respond to price through efficiency measures or other operational changes, these individual forecasts and indices inherently reflect the expected changes in customers' energy use due to economic inputs, including the price of electricity. The Companies recognize that larger commercial and industrial customers may not display a smooth reduction in usage as prices rise. Over the longer-term, in extreme cases, some large energy intensive customers may even cease operations or relocate upon reaching certain energy price points.

RECEIVED

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

APR 04 2018
PUBLIC SERVICE
COMMISSION

In the Matter of:

A REVIEW OF THE ADEQUACY OF)
KENTUCKY'S GENERATION CAPACITY) ADMINISTRATIVE
AND TRANSMISSION SYSTEM) CASE NO. 387

PETITION OF
KENTUCKY UTILITIES COMPANY
FOR CONFIDENTIAL PROTECTION

Kentucky Utilities Company ("KU") petitions the Public Service Commission of Kentucky ("Commission") pursuant to 807 KAR 5:001, Section 13, to grant confidential protection to certain planning-related information it is required to submit in connection with its annual report. In support of this Petition, KU states as follows:

1. By Order of December 20, 2001, in *In the Matter of: A Review of the Adequacy of Kentucky's Generation Capacity and Transmission System*, Administrative Case No. 387, the Commission established findings regarding the adequacy of Kentucky's generation capacity and transmission system. In an effort to continue monitoring these issues, however, the Commission ordered Kentucky's six major jurisdictional electric utilities to file annually certain planning-related information, as defined in Appendix G to its Order, and as amended in its subsequent Order dated March 29, 2004. By Order of October 7, 2005, the Commission closed Administrative Case No. 387, but required jurisdictional utilities to continue to submit such information as a supplement to their annual report (such annual report being the FERC Form No. 1).

2. Simultaneous with the filing of this Petition, KU is filing its annual report including the planning-related information required by Appendix G to the Commission's

December 20, 2001 Order. KU's response to Item No. 14 of Appendix G regarding the need for transmission capacity additions contains confidential information the disclosure of which has a reasonable likelihood of threatening public safety. Additionally, KU's response to Item No. 11 of Appendix G regarding scheduled outages or retirements of generating capacity contains confidential commercial information the disclosure of which would cause KU competitive injury. Therefore, KU's responses to Item Nos. 11 and 14 are being submitted with this request for confidential treatment.

Transmission Capacity Additions

3. Pursuant to Item No. 14 of Appendix G to the Commission's December 20, 2001 Order in Administrative Case No. 387, jurisdictional electric utilities must file annually all planned transmission capacity additions for the 10 years following such filing including such facility's expected in-service date, size and site, as well as, identify the transmission need each addition is intended to address.

4. On June 20, 2005, the Kentucky General Assembly amended the Kentucky Open Records Act to protect from disclosure certain information that has a reasonable likelihood of threatening public safety by exposing a vulnerability "in preventing, protecting against, mitigating, or responding to a terrorist act." KRS 61.878(1)(m). This includes infrastructure records exposing such a vulnerability in the location, configuration, or security of critical systems, including electrical systems. KRS 61.878(1)(m)(1)(f).

5. The information provided in response to Item No. 14 reveals information regarding KU's transmission capacity additions and the need that such additions are intended to address. If such information is made available in the public record, individuals seeking to induce public harm will have critical information concerning the present vulnerabilities of KU's

transmission system. Knowledge of such vulnerabilities may allow such a person to cause public harm through the disruption of the electric transmission system. Because KU's response to Item No. 14 regards planned transmission capacity additions for the next ten years, KU requests the information contained in response to Item No. 14 be afforded confidential protection for a period of ten years.

6. The information contained in response to Item No. 14 for which KU is seeking confidential treatment is not known outside of KU, and it is not disseminated within KU except to those employees with a legitimate business need to know and act upon the information.

Scheduled Outages

7. Pursuant to Item No. 11 of Appendix G to the Commission's December 20, 2001 Order in Administrative Case No. 387, jurisdictional electric utilities also must file annually information concerning scheduled outages or retirements of generating capacity.

8. The Kentucky Open Records Act protects commercial information, generally recognized as confidential or proprietary, if its public disclosure would cause competitive injury to the disclosing entity. KRS 61.878(1)(c). Competitive injury occurs when disclosure of the information would give competitors an unfair business advantage. The information contained in the response to Item No. 11 contains such competitive and proprietary information, and is therefore being submitted with this request for confidential treatment.

9. KU's response to Item No. 11 regarding scheduled maintenance outages and retirements of generation capacity contains sensitive commercial information, the disclosure of which would unfairly advantage KU's competitors for wholesale power sales. This information would allow competitors of KU to know when KU's generating plants will be down for maintenance and thus know a crucial input into KU's generating costs and need for power and

energy during those periods. The commercial risk of the disclosure of this information is that potential suppliers will be able to manipulate the price of power bid to KU in order to maximize their revenues, thereby causing higher prices for KU's customers and giving a commercial advantage to KU's competitors.

10. Further, disclosure of this information will damage KU's competitive position and business interests. The information provided in response to Item No. 11 regarding scheduled outages is highly sensitive information that, if made public, would enable prospective purchasers of KU's power supply to manipulate the bidding process to the detriment of KU. Thus, disclosure of this information may detrimentally impact KU's ability to contract for off-system sales during the same time period. Any impairment of KU's ability to obtain fair prices for its power supply will decrease the price KU is paid for its power supply. As a result, KU will not get the same quality of offers that would be produced by a system protected by the confidentiality employed by unregulated business and KU will not be able to compete effectively for off-system sales. Because KU's response to Item No. 11 regards scheduled outages or retirements of generating capacity during the current year and the following four years, KU requests the information contained in response to Item No. 11 be afforded confidential protection for a period of five years.

11. The information contained in response to Item No. 11 of the Commission's Order for which KU is seeking confidential treatment is not known outside of KU, and it is not disseminated within KU except to those employees with a legitimate business need to know and act upon the information. This information is not on file with the Federal Energy Regulatory Commission, the Securities and Exchange Commission or other public agencies, and is not available from any commercial or other source outside of KU.

12. The information contained in response to Item No. 11 and for which KU is seeking confidential protection is identical in nature to that provided to the Commission in response to the Commission's requests for information in Case No. 2000-497 and previously in this proceeding. The Commission granted confidential protection to KU's planned maintenance schedule for each of KU's generating units.

13. The information provided in response to Item Nos. 11 and 14 of Appendix G to the Commission's December 20, 2001 Order demonstrates on its face that it merits confidential protection. If the Commission disagrees, however, it must hold an evidentiary hearing to protect the due process rights of KU and supply the Commission with a complete record to enable it to reach a decision with regard to this matter. *Utility Regulatory Commission v. Kentucky Water Service Company, Inc.*, Ky. App., 642 S.W.2d 591, 592-94 (1982).

14. KU does not object to disclosure of the confidential information, pursuant to a protective agreement, to intervenors with a legitimate interest in reviewing the confidential information for the purpose of assisting the Commission's review in this proceeding.

15. In accordance with the provisions of 807 KAR 5:001 Section 13, one copy of KU's response to the Commission's request with the confidential information highlighted and ten (10) copies of KU's response without the confidential information is herewith filed with the Commission.

WHEREFORE, Kentucky Utilities Company respectfully requests that the Commission grant confidential protection, or in the alternative, schedule an evidentiary hearing on all factual issues.

Dated: April 4, 2018

Respectfully submitted,

A handwritten signature in blue ink that reads "Allyson K. Sturgeon". The signature is written in a cursive style and is positioned above a horizontal line.

Allyson K. Sturgeon
Senior Corporate Attorney
LG&E and KU Services Company
220 West Main Street
Louisville, Kentucky 40202
Telephone: (502) 627-2088
Fax: (502) 627-3367
allyson.sturgeon@lge-ku.com

Counsel for Kentucky Utilities Company