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VIA OVERNIGHT DELIVERY

March 6, 2014

RECEIVED

MAR 07 2014

PUBLIC SERVICE
COMMISSION

Jeff Derouen
Executive Director
Kentucky Public Service Commission
211 Sower Blvd.
P.O. Box 615
Frankfort KY, 40602-0615

Re: Duke Energy Kentucky, Inc.'s Request for Waiver Pursuant to 807 KAR 5:5058
Section 3, Case No. 2011_____

Dear Mr. Derouen:

Enclosed please find an original and twelve copies of Duke Energy Kentucky, Inc.'s Request For Waiver from certain filing requirements.

Please date-stamp the extra two copies of the Request and return in the enclosed envelope.

Sincerely,

Kristen Ryan
Senior Paralegal
kristen.ryan@duke-energy.com

cc: Dennis G. Howard II
Jennifer B. Hans

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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MAR 07 2014

PUBLIC SERVICE
COMMISSION

In the Matter of Duke Energy Kentucky, Inc.'s)
Integrated Resource Plan)

Case No. 2014- _____

DUKE ENERGY KENTUCKY, INC.'S REQUEST FOR WAIVER PURSUANT TO 807 KAR
5:058 SECTION 3

Now comes Duke Energy Kentucky, Inc. (Duke Energy Kentucky), pursuant to 807 KAR 5:058 Section 3, and respectfully requests the Kentucky Public Service Commission (Commission) grant waiver from the certain filing requirements (Request for Waivers) for Integrated Resource Plans (IRPs). Pursuant to 807 KAR 5:058 Section 3, requests for waivers must be filed ninety (90) days prior to the date established for the IRP filing. Duke Energy Kentucky's 2014 IRP is scheduled to be filed on or about July 1, 2014, resulting in a request for waiver to be filed by April 1, 2014. In support of this Petition, Duke Energy Kentucky respectfully states:

1. Duke Energy Kentucky is a Kentucky corporation and, as a public utility as that term is defined in KRS 278.010(3), is subject to the Commission's jurisdiction. Duke Energy Kentucky is engaged in the business of furnishing gas and electric services to various municipalities and unincorporated areas in Boone, Campbell, Gallatin, Grant, Kenton and Pendleton Counties in the Commonwealth of Kentucky.

2. Duke Energy Kentucky's business address is 139 East Fourth Street, Cincinnati, Ohio 45202. The Company's local office in Kentucky is Duke Energy Envision Center, 4580 Olympic Boulevard, Erlanger, Kentucky 41018.

3. Duke Energy Kentucky's articles of incorporation are on file with the Commission in Case No. 2013-00097 and are incorporated by reference herein pursuant to 807 KAR 5:001, Section 14(2).

4. Pursuant to the Commission's December 16, 2005 Order in Case No. 2005-0370, Duke Energy Kentucky filed its last stand alone IRP on July 1, 2011. As such, Duke Energy Kentucky's next IRP is due to be filed in July 2014.¹

5. In order to prepare its next IRP by the July 1, 2014, Duke Energy Kentucky requests a waiver of the IRP filing requirement embodied in 807 KAR 5:058, Section 7(5) and 807 KAR 5:058 Section 8(3), to the extent those provisions require the filing of information related to an integrated Duke Energy system.

6. Duke Energy Kentucky is the only Duke Energy-affiliated electric utility subject to the jurisdiction of the Kentucky Public Service Commission and operating in the Commonwealth of Kentucky. Duke Energy Kentucky does not share its planning information with its affiliates and the utility operating companies owned by Duke Energy Corporation do not participate in or engage in joint planning for their generation resources on an integrated system-wide basis.

7. Because Duke Energy Kentucky is filing a stand alone IRP, information regarding all affiliated utility operating companies across five states would not provide the Commission with any useful information in determining Duke Energy Kentucky's ability to serve its retail load. Additionally, providing information related to Duke Energy's integrated system would be an unreasonably time-consuming and burdensome process.

8. Duke Energy Kentucky's utility affiliates Duke Energy Carolinas, LLC, Duke Energy Progress, Inc., and Duke Energy Florida, Inc. and operate in North and South Carolina and

¹ 807 KAR 5:058 Section 1(2). Each electric utility shall file triennially with the commission an integrated resource plan...

Florida, respectively. The Carolina and Florida systems are geographically separate from Duke Energy Kentucky. Duke Energy Kentucky does not participate in any joint generation planning with its affiliates, Duke Energy Ohio, Inc., Duke Energy Indiana, Inc., Duke Energy Progress, Inc. or Duke Energy Florida, Inc. Duke Energy Kentucky would incur great expense and effort to create such integrated system-wide information because such information currently does not exist.

9. For these reasons, and in the interest of administrative economy, Duke Energy Kentucky requests a waiver of these IRP filing requirements to the extent they require reporting of Duke Energy-wide integrated system information.

10. This Commission granted a similar waiver request to Duke Energy Kentucky in Case No. 2011-00235 regarding its 2011 IRP.

WHEREFORE, for the reasons stated herein, Duke Energy Kentucky respectfully requests the Commission grant a waiver of the IRP filing requirements as described herein.

Respectfully submitted,



Rocco D'Ascenzo
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*Counsel for Duke Energy
Kentucky, Inc.*

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing filing was served on the following via ordinary mail, postage prepaid, this 6th day of March 2014:

The Office of the Kentucky Attorney General
Dennis G. Howard, II
700 Capitol Avenue
Suite 118
Frankfort, KY 40601-3458

The Office of the Kentucky Attorney General
Jennifer B. Hans
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