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**VIA OVERNIGHT DELIVERY**

March 22, 2018

Ms. Gwen R. Pinson  
Executive Director  
Kentucky Public Service Commission  
211 Sower Blvd  
Frankfort, KY 40601

RECEIVED

MAR 23 2018

PUBLIC SERVICE  
COMMISSION

**Re: Case No. 2018- 00111  
In the Matter of Duke Energy Kentucky, Inc.'s Integrated Resource Plan**

Dear Ms. Pinson:

Duke Energy Kentucky, Inc. hereby submits its Request for Waiver pursuant to 807 KAR 5:058 Section 3. Enclosed please find one (1) original plus twelve (12) paper copies.

Please date-stamp the extra two copies of the cover letter and requests and return to me in the enclosed overnight envelope.

Sincerely,

Rocco D'Ascenzo  
Deputy General Counsel

cc: Rebecca Goodman

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MAR 23 2018

PUBLIC SERVICE  
COMMISSION

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of Duke Energy Kentucky, Inc.'s ) Case No. 2018- 00111  
Integrated Resource Plan )

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

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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 2018 IRP is scheduled to be filed on or about June 21, 2018, resulting in a request for waiver to be filed by March 23, 2018. 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, Bracken, 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. Pursuant to 807 KAR 5:001, Section 14(2), Duke Energy Kentucky states that it was originally incorporated in the Commonwealth of Kentucky on March 20, 1901, and attests that it is currently in good standing in said Commonwealth. Duke Energy Kentucky's articles of incorporation are on file with the Commission in Case No. 2017-00321 and are incorporated by reference.

4. Pursuant to the Commission's September 23, 2015 Order in Case No. 2014-00273, Duke Energy Kentucky's next IRP is due to be filed no later than June 21, 2018.<sup>1</sup>

5. In order to prepare its next IRP by June 21, 2018, Duke Energy Kentucky requests a waiver of the IRP filing requirements 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 six 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.

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<sup>1</sup> *In the Matter of 2014 Integrated Resource Plan of Duke Energy Kentucky, Inc.*, Case No. 2014-00273, Ky P.S.C. September 23, 2015.

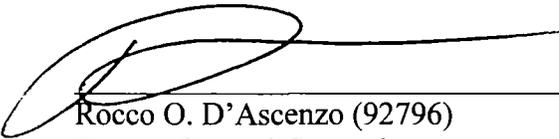
8. Duke Energy Kentucky's utility affiliates Duke Energy Carolinas, LLC, Duke Energy Progress, LLC, and Duke Energy Florida, LLC operate in North and South Carolina and Florida, respectively. The Carolina and Florida systems are geographically separate from Duke Energy Kentucky. Duke Energy Kentucky does not participate in any joint generation planning with its affiliates, Duke Energy Ohio, Inc., Duke Energy Indiana, LLC, Duke Energy Progress, LLC or Duke Energy Florida, LLC. 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 by Order dated March 18, 2014, in Case No. 2014-00079 regarding its 2014 IRP.<sup>2</sup>

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,



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*Counsel for Duke Energy Kentucky, Inc.*

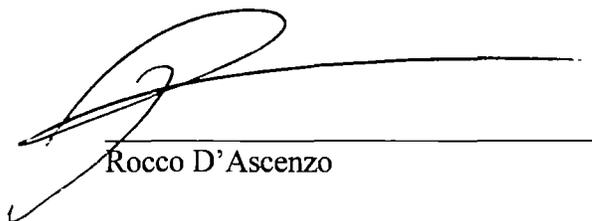
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<sup>2</sup> *In the Matter of Duke Energy Kentucky, Inc. 's Request for Waiver Pursuant to 807 KAR 5:058 Section 3, Case No. 2014-00079, Ky P.S.C. March 18, 2014.*

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing filing was served on the following via ordinary mail, this 22<sup>ND</sup> day of March 2018:

Rebecca Goodman  
The Office of the Attorney General  
Utility Intervention and Rate Division  
700 Capital Avenue, Suite 20  
Frankfort, Kentucky 40601-8204



Rocco D'Ascenzo