

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

IN THE MATTER OF:

THE APPLICATION OF KENTUCKY UTILITIES COMPANY FOR AN ADJUSTMENT OF BASE RATES)))	CASE NO. 2016-00370
THE APPLICATION OF LOUISVILLE GAS AND ELECTRIC COMPANY FOR AN ADJUSTMENT OF ITS ELECTRIC AND GAS BASE RATES)))	CASE NO. 2016-00371

**PETITION TO AMEND PROCEDURAL SCHEDULE OF
KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC.**

On November 23, 2016, Kentucky Utilities Company and Louisville Gas and Electric Company (collectively, “Companies”) submitted the testimony of William Steven Seeyle in these proceedings. That testimony included cost-of-service studies intended to be used as a guideline for purposes of allocating the proposed rate increase to the Companies’ rate classes. On March 3, 2017, Kentucky Industrial Utility Customers, Inc. (“KIUC”) submitted the testimony of Stephen J. Baron in these proceedings, which identified significant and material problems with the Companies’ initial cost-of-service studies. Mr. Baron concluded that in light of those significant and material problems, the Companies’ studies did not provide a reasonable guideline for purposes of revenue allocation. On March 28, 2017, in an effort to correct the errors cited in Mr. Baron’s testimony, the Companies submitted Supplemental Data Responses that provided newly revised cost-of-service studies.¹

Based upon KIUC’s initial review, the Companies’ revised cost-of-service studies still do not accurately reflect the costs of serving certain rate classes. Accordingly, in the interests of fairness and in order to more fully develop the record in this case, KIUC respectfully requests that the Commission

¹ Companies’ Supplemental Data Responses to Commission Staff’s First Request for Information, Question 53.

amend the procedural schedule in this case in order to provide KIUC an opportunity to submit supplemental testimony responsive to the Companies' revised cost-of-service studies. That supplemental testimony would include additional cost-of-service studies prepared by KIUC witness Baron that could not be presented in Mr. Baron's initial testimony due to the flawed information contained in the Companies' initial cost-of-service studies. KIUC asks that the deadline for such supplemental testimony fall on or before April 14, 2017 - the deadline for the Companies' Rebuttal Testimony in these proceedings.

Providing KIUC the requested opportunity will give both the Commission and other parties adequate time to review and understand KIUC's concerns prior to the hearing, expediting the hearing process. It will also help foster a more thorough record with respect to what revenue allocations may or may not be reasonable in these proceedings. Conversely, denial of KIUC's petition will unduly prejudice KIUC and violate its due process rights. Accordingly, if KIUC's requested procedural amendment is not granted, then in the alternative, KIUC moves to strike the Companies' revised cost-of-service studies from the record in these proceedings.

Respectfully submitted,



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