

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In The Matter of:

Electronic Application of Kentucky Power	)	
Company For (1) A General Adjustment of Its	)	
Rates for Electric Service; (2) An Order	)	
Approving Its 2017 Environmental Compliance	)	CASE No.
Plan; (3) An Order Approving Its Tariffs and	)	2017-00179
Riders; (4) An Order Approving Accounting	)	
Practices to Establish a Regulatory Asset or	)	
Liability Related to the Big Sandy 1 Operation	)	
Rider; and (5) An Order Granting All Other	)	
Required Approvals and Relief	)	

**ATTORNEY GENERAL’S MOTION FOR LEAVE TO FILE REBUTTAL  
TESTIMONY LIMITED TO INTERVENOR TESTIMONY REGARDING COST OF  
SERVICE, COST ALLOCATION, AND RATE OF RETURN ISSUES**

Comes now the intervenor, the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention, and hereby moves the Commission to amend its procedural schedule in this matter issued on July 17, 2017, in order to allow intervenors the right to file rebuttal testimony limited solely to the issues of cost of service, cost allocation, and rate of return as addressed in other intervenors’ pre-filed testimony.

In support of this motion, the Attorney General states that at least five (5) of the intervenors in this case have addressed these issues in their pre-filed testimony. As normally occurs in base rate cases filed before the Commission, intervenors normally have only one opportunity to file testimony, which is done on a simultaneous basis. By definition, it is therefore normally impossible for intervenors to address any other intervenor testimony. In this case, however, some of the viewpoints, opinions and recommendations set forth in the testimony of some of these intervenors regarding the issues of cost of service, cost allocation and rate of return have the potential to unduly prejudice residential customers. The Attorney

General believes these issues will prove to be very important in this case, and that such rebuttal testimony will aid the Commission in reaching its final order. Finally, the Attorney General believes that such intervenor rebuttal testimony could be filed on November 3, 2017, the same date on which Kentucky Power is currently scheduled to file its own rebuttal testimony. Therefore, allowing intervenors to file rebuttal testimony limited to cost of service, cost allocation and rate of return will not affect the timing of any further events scheduled in this case.

WHEREFORE, the Attorney General respectfully requests that the Commission grant his motion.

Respectfully submitted,

ANDY BESHEAR  
ATTORNEY GENERAL



LAWRENCE W. COOK  
KENT A. CHANDLER  
REBECCA W. GOODMAN  
JUSTIN M. McNEIL  
ASSISTANT ATTORNEYS GENERAL  
700 CAPITOL AVE., SUITE 20  
FRANKFORT KY 40601  
(502) 696-5453  
FAX: (502) 573-8315  
[Rebecca.Goodman@ky.gov](mailto:Rebecca.Goodman@ky.gov)  
[Larry.Cook@ky.gov](mailto:Larry.Cook@ky.gov)  
[Kent.Chandler@ky.gov](mailto:Kent.Chandler@ky.gov)  
[Justin.McNeil@ky.gov](mailto:Justin.McNeil@ky.gov)

*Certificate of Service and Filing*

Counsel certifies that the foregoing is a true and accurate copy of the same document being filed in paper medium with the Commission within two business days; that the electronic filing has been transmitted to the Commission on October 11, 2017; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding.

This 11<sup>th</sup> day of October, 2017.



---

Assistant Attorney General