

**Commonwealth of Kentucky  
Before the Public Service Commission**

In the Matter of:

|  |            |
|--|------------|
| ELECTRONIC APPLICATION OF DUKE ENERGY KENTUCKY, )    |            |
| INC.) FOR: 1) AN ADJUSTMENT OF THE ELECTRIC RATES; ) |            |
| PLAN 2) APPROVAL OF AN ENVIRONMENTAL COMPLIANCE )    |            |
| AND SURCHARGE MECHANISM; 3) APPROVAL OF NEW )        | CASE NO.   |
| TARIFFS;4) APPROVAL OF ACCOUNTING PRACTICES TO )     | 2017-00321 |
| ESTABLISH REGULATORY ASSETS AND LIABILITIES; AND )   |            |
| 5) ALL OTHER REQUIRED APPROVALS AND RELIEF )         |            |

**KENTUCKY LEAGUE OF CITIES  
MOTION TO INTERVENE**

Comes now the Kentucky League of Cities (“KLC”) and pursuant to 807 KAR 5:001, Section 4(11) requests that it be granted intervenor status in the above-captioned proceeding. In support thereof, KLC states as follows:

1. KLC is a nonprofit membership association representing more than 380 Kentucky cities as well as municipal agencies.
2. For the purposes of this proceeding, KLC represents all municipalities receiving electric service from Duke Energy Kentucky (“DEK”), which specifically includes the Cities of Florence, Union, Walton, Newport, Bellevue, Dayton, California, Crestview, Alexandria, Cold Spring, Wilder, Silver Grove, Woodlawn, Fort Thomas, Highland Heights, Southgate, Melbourne, Covington, Edgewood, Elsmere, Park Hills, Bromley, Erlanger, Fort Wright, Ludlow, Lakeside Park, Independence, Taylor Mill, Crescent Springs, Ryland Heights, Crescent Hills, Villa Hills, Fairview, Walton, Williamstown, Dry Ridge, Crittenden, Corinth, Falmouth, Butler, Williamstown.

3. KLC has a special interest in this case that cannot be represented by any other party. KLC's membership includes a diversity of cities in terms of size, population, infrastructure and geographic location within the Commonwealth. The interests of these cities cannot adequately be represented by any other party.
4. DEK has nine (9) separate lighting tariffs that impact cities throughout the service territory. As KLC represents the customers paying the majority of revenue generated under these tariffs, KLC and its membership has a particular interest in the rates charged under these tariffs. In addition, DEK is proposing an LED street lighting tariff, which, should the tariff be approved, will primarily impact KLC's membership.
5. KLC intends to examine and offer testimony on the areas of rate allocation and revenue requirement. KLC also intends to examine and offer testimony on the proposed environmental compliance plan and surcharge mechanism. KLC is still assessing the possibility of examining and offering testimony on the requested increase to DEK's return on equity. The full extent of these impacts on KLC's membership cannot be determined without the opportunity to participate fully in this case.
6. KLC's participation in this case is likely to present issues and develop facts that will assist the Commission in fully considering the matter and will not unduly complicate or disrupt the proceeding. KLC intends to participate in every aspect of the case, including offering testimony on the impact of the proposed rate increase on KLC's membership.
7. KLC acknowledges the deadline to intervene in this proceeding was October 13, 2017 and that this motion will not be filed until October 17, 2017. The delay in filing was caused by KLC's process of senior management conferring with key senior board members prior to proceeding with intervention. The decision to intervene was further

delayed by extensive review of the KLC budget for this case. In short, KLC wanted to be sure the organization could fully support intervention and through participation in the proceeding. At this time, both questions have been answered in the affirmative.

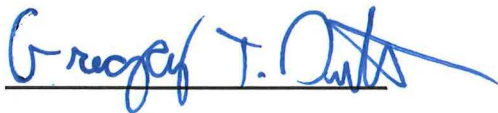
8. While KLC is moving for intervention after the deadline established in the Commission's procedural order, it seeks no amendment of the schedule and intends to fully comply with the remaining deadlines.
9. The attorneys authorized to represent Kentucky League of Cities in this matter and take service of all documents are:

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WHEREFORE, the Kentucky League of Cities moves the Commission to issue an Order granting status as an intervenor party in this action pursuant to 807 KAR 5:001, Section 4(11).

Respectfully submitted,



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