

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

The Electronic Application of Duke)
Energy Kentucky, Inc. for: 1) An)
Adjustment of the Electric Rates; 2)) Case No. 2019-00271
Approval of New Tariffs; 3) Approval of)
Accounting Practices to Establish)
Regulatory Assets and Liabilities; and 4))
All Other Required Approvals and Relief.)

DUKE ENERGY KENTUCKY, INC.'S MOTION FOR DEVIATION FROM
FILING REQUIREMENTS

Comes now Duke Energy Kentucky, Inc., (Duke Energy Kentucky or the Company), pursuant to 807 KAR 5:001 Section 22, and moves the Commission for a deviation from the requirements governing the filing of paper copies of a Cost Allocation Manual in the context of its forthcoming Application for an adjustment of electric rates. In support of this Motion, Duke Energy Kentucky respectfully states as follows:

1. Duke Energy Kentucky filed a Notice of Intent to file an Application for an adjustment of its electric rates on August 1, 2019. Pursuant to 807 KAR 5:001, Section 16(7)(u), Duke Energy Kentucky is required to include a detailed description of the method used to allocate charges to the Company by an affiliate. Moreover, KRS 278.2205(6) requires that a Cost Allocation Manual satisfying the requirements of KRS 278.2203 and KRS 278.2205 must be tendered as part of the initial filing for an application for an adjustment in rates pursuant to KRS 278.190. Pursuant to 807 KAR 5:001, Section 7(2) all filings must be submitted in a paper format.
2. Duke Energy Kentucky will be attaching a copy of its current Cost Allocation Manual to its Application, which will be filed on or about September 3, 2019. The Cost Allocation Manual alone is approximately 1,400 pages and has previously been filed with the Commission in

other contexts. Most recently, the Company provided the Commission with a copy of the Cost Allocation Manual on March 31, 2019 as part of its annual reporting to the Commission. Thus, complying with the Commission's Order to tender six paper copies of its Application in addition to the electronic copy, would require the filing of an additional 8,400 pages of paper which are believed to be in the Commission's possession already.

3. The Commission has granted an identical motion submitted by Duke Energy Kentucky in Case No. 2017-00321.¹

4. Based upon the foregoing, Duke Energy Kentucky hereby respectfully requests permission, pursuant to 807 KAR 5:001, Section 22, to deviate from the requirements of 807 KAR 5:001 Section 7(2) and to be allowed to file the Cost Allocation Manual in a PDF format on a CD attached to the Application. All other documents (approximately 14 volumes) will still be filed in paper format.


WHEREFORE, for the reasons set forth herein, Duke Energy Kentucky respectfully moves the Commission to grant a deviation and allow Duke Energy Kentucky to file its Cost Allocation Manual in PDF format on a CD.

This 16th day of August 2019.

¹ *In the Matter of the Electronic Application of Duke Energy Kentucky, Inc. for: 1) An Adjustment of the Electric Rates; 2) Approval of an Environmental Compliance Plan and Surcharge Mechanism; 3) Approval of New Tariffs; 4) Approval of Accounting Practices to Establish Regulatory Assets and Liabilities; and 5) All Other Required Approvals and Relief, Case No 2017-00321 (Order) (Ky. P.S.C. September 1, 2017).*

Respectfully submitted,

Duke Energy Kentucky, Inc.,



Rocco O. D'Ascenzo
Deputy General Counsel
139 East Fourth Street
Cincinnati, OH 45202
(513) 287-4320
rocco.d'ascenzo@duke-energy.com


And

David Samford
L. Allyson Honaker
Goss Samford, PLLC
2365 Harrodsburg Rd., Suite B-325
Lexington, KY 40504
(859) 368-7740
david@gosssamfordlaw.com
allyson@gosssamfordlaw.com

CERTIFICATE OF SERVICE

This is to certify that the foregoing electronic filing is a true and accurate copy of the document being filed in paper medium; that the electronic filing was transmitted to the Commission on August 16, 2019; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and that a copy of the filing in paper medium is being delivered 2nd day delivery to the Commission on the 16th day of August, 2019 and a copy of the filing is also being emailed to the following:

Hon. Rebecca W. Goodman
The Office of Attorney General
Utility Intervention and Rate Division
700 Capital Ave., Suite 20
Frankfort, Kentucky 40601


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