

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 LEAVE TO
FILE A CORRECTION TO THE DIRECT TESTIMONY OF
MELISSA B. ABERNATHY, INSTANTER**

Duke Energy Kentucky, Inc., (Duke Energy Kentucky or Company) hereby respectfully moves the Kentucky Public Service Commission (Commission) pursuant to 807 KAR 5:001 Section 4(5) for leave to file an errata sheet to the Direct Testimony of Melissa B. Abernathy in this case, Instanter. Said testimony was filed on or about September 3, 2019. In the course of preparing responses to Commission Staff's First Set of Information Requests, the Company discovered an inadvertent typo contained in the direct testimony of Ms. Abernathy that misstates the dollar amount related to the total of the four AROs excluding the coal ash basin closure at East Bend. Duke Energy Kentucky is now seeking to file a correction to the testimony of Melissa B. Abernathy, Instanter to correct the record in this proceeding. On Page 8, Lines 9-12 of Ms. Abernathy's testimony, Ms. Abernathy provides a dollar amount of \$4.3 million. This dollar amount is incorrect and should have been \$24.3 million.

To fix this inadvertent error, Ms. Abernathy respectfully submits a corrected Page 8, Lines 9-12, to her direct testimony that corrects the dollar amount as follows:

The total of the four AROs excluding the coal ash basin closure at East Bend is \$24.3 million at June 30, 2019, and is supported by underlying cash flows of \$34.6 million (\$31.4 million for landfills, \$2.9 million for asbestos and \$0.3 million to remove telecommunication assets.)

The Company respectfully submits that no parties have been harmed because of this inadvertent typo.

WHEREFORE, Duke Energy Kentucky respectfully requests that it be granted leave to file the correction to the direct testimony of Melissa B. Abernathy.

Respectfully submitted,



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Counsel for Duke Energy Kentucky, Inc.

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 October 3, 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 sent 2nd day delivery to the Commission on the 3rd day of October 2019 and a copy of the filing in paper medium is also being mailed to the following:

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

Hon. Kurt J. Boehm
BOEHM, KURTZ & LOWRY
36 East Seventh Street, Suite 1510
Cincinnati, Ohio 45202



Rocco O. D'Ascenzo

1 asbestos removal are currently included in Duke Energy Kentucky's Fossil
2 Dismantlement study performed by Burns and McDonnell submitted in the
3 Company's last electric base rate case, Case No. 2017-00321, and are already
4 collected through rates; therefore, they are not included separately for recovery in this
5 case. The removal of the company-owned telecommunications assets from leased
6 towers will begin no earlier than 2023. The timing of final closure of the East Bend
7 landfills is expected to occur in 2021-2022 for the East Landfill and 2040 for the West
8 Landfill to correspond with the respective anticipated end of life for each landfill.

9 The total of the four AROs excluding the coal ash basin closure at East Bend
10 is \$24.3 million at June 30, 2019, and is supported by underlying cash flows of \$34.6
11 million (\$31.4 million for landfills, \$2.9 million for asbestos and \$0.3 million to
12 remove telecommunication assets.)

III. INFORMATION PROVIDED TO OTHER WITNESSES

13 **Q. DID YOU SUPPLY ANY INFORMATION TO OTHER WITNESSES FOR**
14 **THEIR USE IN THIS PROCEEDING?**

15 **A.** Yes, I provided Mr. Jacobi with the actual net book value for the existing gas,
16 electric and common plant for the period ending May 31, 2019, for his use in
17 calculating the forecasted financial data.