

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 APPLICATION FOR AUTHORITY TO
ADJUST ELECTRIC RATES, APPROVAL OF NEW TARIFFS, APPROVAL OF
ACCOUNTING PRACTICES TO ESTABLISH REGULATORY ASSETS AND
LIABILITIES AND FOR ALL OTHER REQUIRED APPROVALS AND RELIEF**

Applicant, Duke Energy Kentucky, Inc., (Duke Energy Kentucky or the Company), by counsel, pursuant to KRS 278.180, KRS 278.190, KRS 278.192, 807 KAR 5:001 Section 14 and Section 16, and other applicable law, hereby applies to the Kentucky Public Service Commission (Commission) for authority to adjust its electric rates, approval of new tariffs, including, but not limited to, approval of certain accounting practices to establish regulatory assets and liabilities, and for all other required approvals and relief (collectively this Application). As set forth in the Company's Notice of Intent filed on August 1, 2019, in accordance with KRS 278.180(1), and 807 KAR 5:001, Section 16(2), this Application is supported by a fully forecasted test period consisting of the twelve months ending March 31, 2021. The Notice of Intent was served upon the Attorney General of the Commonwealth of Kentucky, Office of Rate Intervention. A copy of the Notice of Intent is attached hereto at Vol. 1, Tab 1 of the filing requirements.

In support of this Application, Duke Energy Kentucky respectfully states as follows:

Introduction

1. Duke Energy Kentucky is a “utility” as defined in KRS 278.010(3) and is subject to the Commission’s jurisdiction pursuant to KRS 278.040. In accordance with 807 KAR 5:001, Section 14(1), Duke Energy Kentucky is a Kentucky corporation with its principal office and principal place of business at 139 East Fourth Street Cincinnati, Ohio 45202. The Company’s local office in Kentucky is Duke Energy Erlanger Ops Center, 1262 Cox Road, Erlanger, Kentucky 41018. The Company further states that its electronic mail address for purposes of this matter is KYfilings@duke-energy.com.

2. Duke Energy Kentucky is a utility engaged in the gas and electric business. Duke Energy Kentucky purchases, sells, stores and transports natural gas in Boone, Bracken, Campbell, Gallatin, Grant, Kenton and Pendleton Counties, Kentucky. Duke Energy Kentucky also generates electricity, which it distributes and sells in Boone, Campbell, Grant, Kenton and Pendleton Counties.

3. Pursuant to 807 KAR 5:001, Section 14(2), Duke Energy Kentucky states that it was originally incorporated in the Commonwealth of Kentucky on March 20, 1901, and attests that it is currently in good standing in said Commonwealth. Pursuant to 807 KAR 5:001, Section 14(2), a certified copy of Duke Energy Kentucky’s certificate of good standing from the Kentucky Secretary of State is attached at Volume 1, Tab 5, of this filing, and is incorporated by reference. Duke Energy Kentucky has on file with the Office of the Secretary of State a certificate for the following assumed name: “Duke Energy.” The required certificate of assumed name is attached at Volume 1, Tab 9 of this filing, and is

incorporated by reference.

4. This Application constitutes notice to the Commission pursuant to KRS 278.180(1) of the changes proposed to be made to Duke Energy Kentucky's electric rates. Duke Energy Kentucky's Statutory Notice is attached to this Application. Duke Energy Kentucky is filing its Certificate of Notice to the public of the changes in its tariffs that result in increased rates, which Certificate is attached hereto at Volume 1, Tab 12 of this Application.

5. Pursuant to 807 KAR 5:001 Section 8, on August 1, 2019, Duke Energy Kentucky filed with the Commission, its notice of intent to use electronic filing procedures in this proceeding. Copies of all orders, pleadings and other communications related to this proceeding should be directed to:

William Don Wathen, Jr.
Director Rates and Regulatory Strategy
Duke Energy Kentucky, Inc.
139 East Fourth Street
Cincinnati, OH 45202
513-287-2327
Don.wathen@duke-energy.com

Rocco O. D'Ascenzo
Deputy General Counsel
Duke Energy Kentucky, Inc.,
139 East Fourth Street
Cincinnati, OH 45202
513-287-4320
Amy.spiller@duke-energy.com
Rocco.d'ascenzo@duke-energy.com

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

Adjustment of Electric Rates

6. Duke Energy Kentucky's present electric rates and charges, which are based on costs forecasted during the twelve months ended March 31, 2019, were authorized by this Commission by Order dated April 13, 2018 and as amended on rehearing by Order dated October 2, 2018, in Case No. 2017-00321.¹

7. In accordance with the provisions of KRS 278.180, KRS 278.190, and KRS 278.192, Duke Energy Kentucky requests Commission approval of a change in existing rates, including but not limited to a change in its depreciation rates, establishment of new rates, and changes in terms, conditions and tariffs for electric service. Duke Energy Kentucky proposes to implement and change its existing rates and tariffs to those rates and charges set forth in the proposed tariff(s) attached hereto at Schedule L contained in Volume 12, of this Application. A comparison of the present and proposed rates and charges is attached hereto in the notice contained in Volume 1, Tab 12 and in Volume 12, Schedule L of this Application.

8. Duke Energy Kentucky has several special contracts on file with this Commission consisting primarily of interconnection agreements and Back-Up Delivery Point/Reserve Capacity service agreements pursuant to the Company's Commission-approved Back-Up Delivery Point Rider (Rider BDP). In addition, Duke Energy Kentucky has one special contract for the purchase and sale of renewable energy credits to a specific customer. With this Application, Duke Energy Kentucky is not seeking to change any of

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, (Ky. P.S.C. Order) (April 13, 2018); (Order) (October 2, 2018).

those special contracts, except to the extent such contracts incorporate base rates charges or other standard tariff provisions that are impacted by the Company's Application.

9. Duke Energy Kentucky seeks to adjust its electric base rates (including fuel) to a new total of \$356.9 million, which reflects an increase from its current rates of approximately \$45.6 million. The increase in base rates takes into account the offsetting impact of cost-effective energy efficiency in terms of adjustments to the Company's load forecast as used in its application. The monthly residential electric bill increase (total bill) due to the proposed electric base rates will be 16.2 percent or approximately \$15.62 for a residential customer using 1,000 kWh of electricity (the typical monthly consumption of a Duke Energy Kentucky residential customer). The amounts of the proposed new total rates are at Volume 11, Schedule A, of this filing, and are incorporated by reference. The proposed new charges and the impact of the proposed adjustment on each customer class are provided at Volume 12, Schedule N of this Application, and are incorporated by reference. Duke Energy Kentucky states that it will implement this adjustment effective October 3, 2019.

10. In its application, Duke Energy Kentucky is proposing clarifying language changes to several tariffs and service regulations, as well as, requesting changes to accounting methods to establish and implement two deferrals for regulatory assets and liabilities related to deferral of actual costs, incremental to amounts in base rates, for major storms and a regulatory asset for the company's electric vehicle pilot program as further described herein.

Support for Change in Existing Rates and Tariffs

11. In accordance with 807 KAR 5:001 Section 16(1)(b)(1), Duke Energy Kentucky states that the primary reason for this requested change in rates, terms, conditions and tariffs is that Duke Energy Kentucky's earned rate of return on rate base obtained from its current electric operations is projected to be 3.098 percent, which is inadequate to enable the Company to continue providing safe, reasonable and reliable service to its customers and is insufficient to afford Duke Energy Kentucky a reasonable opportunity to earn a fair return on its investment property that is used to provide such service while attracting necessary capital at reasonable rates. In addition, the Company is seeking to recover, through amortization, certain regulatory assets, including but not limited to: 1) storm restoration expenses resulting from the November 2018 ice storm, which was previously authorized by the Commission since the time of the Company's last electric rate case and 2) rate case expenses resulting from this instant rate case.

12. In accordance with 807 KAR 5:001 Section 16(1)(b)(1), a more detailed statement of the reasons for the adjustment is provided in the direct testimony of Company witnesses Ms. Amy B. Spiller, Mr. William Don Wathen, Jr., and Ms. Sarah E. Lawler, as well as others, filed contemporaneously with this Application, and incorporated by reference.

13. Duke Energy Kentucky certifies that its annual reports, including the annual report for year ending 2018, are on file with this Commission as required by 807 KAR 5:006, Section 4(1).

14. The aggregate total revenue from Duke Energy Kentucky's non-regulated incidental activities exceeds the lesser of 2 percent of Duke Energy Kentucky's total

revenue or \$1 million, annually; therefore, Duke Energy Kentucky is required under KRS 278.2203 and KRS 278.2205 to submit a cost allocation manual (CAM) with this filing. The Company periodically submits its CAM to the Commission when material changes are made. The Company last provided the Commission with a copy of its CAM by overnight delivery on March 31, 2019. A Copy of the CAM is included in Volumes 18 and 19 of this Application.

15. Pursuant to 807 KAR 5:001, Section 16(1)(b)(8), Duke Energy Kentucky states that its proposed tariffs and proposed tariff changes are provided at Volume 12, Schedule L of this filing, and is incorporated by reference. The effective date of the proposed tariffs and proposed tariff changes is October 3, 2019.

16. Pursuant to 807 KAR 5:001, Section 16(1)(b)(5), Duke Energy Kentucky states that it has complied with 807 KAR 5:011, Section 16(2) and 807 KAR 5:001, Sections 17(3) and (4) by delivering to the newspapers of general circulation in its service territory area a copy of a Legal Notice for publishing once a week for three consecutive weeks in a prominent manner, the first of said publications to be made no later than the date this application is filed with the Commission. A copy of the Legal Notice is attached at Volume 1, Tab 12, of this Application, Notice and Statement, and is incorporated by reference. Duke Energy Kentucky states that it will implement this adjustment effective October 3, 2019.

17. Pursuant to 807 KAR 5:001, Section 17, Duke Energy Kentucky states that it has filed with the Executive Director of this Commission a written notice of its intention to file this application, and mailed a copy to the Utility Intervention and Rate Division of the Attorney General's office. A copy of the written notice is attached at Volume 1, Tab 1,

of this filing, and is incorporated by reference.

18. Pursuant to 807 KAR 5:001, Section 17, Duke Energy Kentucky states that it will post a copy of this filing at its place of business on the date on which this application is filed and it will remain posted until this Commission has finally determined Duke Energy Kentucky's electric rates and will also be posted, within five business days of the date of filing this application with the Commission, on Duke Energy Kentucky's website www.duke-energy.com which will contain a hyperlink to the Commission's website where this application can be viewed.

19. Pursuant to 807 KAR 5:001, Section 12, Duke Energy Kentucky states that its financial exhibit is provided at Volume 1, Tab 3, of this filing, and is incorporated by reference.

20. Duke Energy Kentucky supports its request for a change in existing rates and tariffs for electric service with the verified testimony and exhibits of the following:

- a. Amy B. Spiller, President, Duke Energy Kentucky;
- b. Melissa B. Abernathy, Manager Accounting II;
- c. Thomas "TK" Christie, Director Distribution Vegetation Management;
- d. Retha Hunsicker, Vice President Customer Connect-Solutions;
- e. Christopher M. Jacobi, Director, Regional Financial Forecasting;
- f. Jeff L. Kern, Lead Rates and Regulatory Strategy Analyst;
- g. Zachary Kuznar PhD, Managing Director Combined Heat and Power Microgrid and Energy Storage Development;
- h. Sarah E. Lawler, Director Rates, and Regulatory Planning;

- i. Renee Metzler, Managing Director Retirement;
- j. Roger A. Morin, PhD, Principal, Utility Research International;
- k. J. Michael Mosley, Vice President Midwest Generation;
- l. Ash M. Norton, Director Distribution Design Engineering;
- m. John Panizza, Director, Tax Operations;
- n. Benjamin Walter Bohdan Passty, Ph.D., Lead Load Forecasting Analyst;
- o. Lesley G. Quick, Vice President Revenue Services;
- p. Lang W. Reynolds, Director of Electrification Strategy;
- q. Andrew S. Ritch, Wholesale Renewable Manager;
- r. Jeffrey R. Setser, Director of Allocations and Reporting;
- s. John J. Spanos, Gannet Fleming Valuation and Rate Consultants, LLC;
- t. John A. Verderame, Managing Director Power Trading and Dispatch;
- u. William Don Wathen Jr., Director, Rates and Regulatory Strategy, Ohio and Kentucky;
- v. Danielle L. Weatherston, Manager Accounting II; and
- w. James E. Ziolkowski, Director, Rates and Regulatory Planning.

21. Duke Energy Kentucky further supports its request for a change in its existing rates and tariffs for electric service with the following exhibits complying with the requirements of 807 KAR 5:001, Sections 14, 16, and 17:

Tab	Filing Requirement	Description
4	807 KAR 5:001 Section 14(1)	Name, Address, Facts
5	807 KAR 5:001 Section 14(2)	Corporation in good standing
6	807 KAR 5:001 Section 14(3)	LLC- in good standing
7	807 KAR 5:001 Section 14(4)	LP- Agreement
8	807 KAR 5:001 Section 16(1)(b)(1)	Reason for Rate Adjustment
9	807 KAR 5:001 Section 16(1)(b)(2)	Certificate of Assumed Name
10/ Schedule L, Vol. 12	807 KAR 5:001 Section 16(1)(b)(3)	New/revised Tariff w/ effective date
11/ Schedule L, Vol. 12	807 KAR 5:001 Section 16(1)(b)(4)	Proposed Tariff Changes
12	807 KAR 5:001 Section 16(1)(b)(5)	Statement about Customer Notice
13	807 KAR 5:001 Section 16(2)	Notice of Intent
14	807 KAR 5:001 Section 16(3)	Compliance with 807 KAR 5:051, Section 2
15	807 KAR 5:001 Section 16(6)(a)	Financial Data
16	807 KAR 5:001 Section 16(6)(b)	Forecasted Adjustments
17	807 KAR 5:001 Section 16(6)(c)	Capitalization and Rate Base
18	807 KAR 5:001 Section 16(6)(d)	No Revisions to Forecast
19	807 KAR 5:001 Section 16(6)(e)	Alternative Forecast
20	807 KAR 5:001 Section 16(6)(f)	Reconciliation of Rate Base and Capital
21/ Testimony Vol. 14-17	807 KAR 5:001 Section 16(7)(a)	Testimony
22	807 KAR 5:001 Section 16(7)(b)	Capital Construction Budget
23	807 KAR 5:001 Section 16(7)(c)	Description of Factors Supporting Forecast
24	807 KAR 5:001 Section 16(7)(d)	Annual and Monthly Budgets
25	807 KAR 5:001 Section 16(7)(e)	Attestation
26	807 KAR 5:001 Section 16(7)(f)	Major Construction Projects
27	807 KAR 5:001 Section 16(7)(g)	Other Construction Projects
28	807 KAR 5:001 Section 16(7)(h)	Financial Forecasts
28	807 KAR 5:001 Section 16(7)(h)(1)	Operating Income Statement
28	807 KAR 5:001 Section 16(7)(h)(2)	Balance Sheet
28	807 KAR 5:001 Section 16(7)(h)(3)	Statement of Cash Flows
28	807 KAR 5:001 Section 16(7)(h)(4)	Revenue Requirements
28	807 KAR 5:001 Section 16(7)(h)(5)	Load Forecast
28	807 KAR 5:001 Section 16(7)(h)(6)	Access Line Forecast (telephone)
28	807 KAR 5:001 Section 16(7)(h)(7)	Mix of Generation
28	807 KAR 5:001 Section 16(7)(h)(8)	Mix of Gas Supply

28	807 KAR 5:001 Section 16(7)(h)(9)	Employee Level
28	807 KAR 5:001 Section 16(7)(h)(10)	Labor Cost Changes
28	807 KAR 5:001 Section 16(7)(h)(11)	Capital Structure Requirement
28	807 KAR 5:001 Section 16(7)(h)(12)	Rate Base
28	807 KAR 5:001 Section 16(7)(h)(13)	Gallons of Water to be sold
28	807 KAR 5:001 Section 16(7)(h)(14)	Customer Forecast (gas/water)
28	807 KAR 5:001 Section 16(7)(h)(15)	Sales Volume Forecast (gas)
28	807 KAR 5:001 Section 16(7)(h)(16)	Toll and Access Forecast (telephone)
28	807 KAR 5:001 Section 16(7)(h)(17)	A Detailed Explanation of Other Info.
29	807 KAR 5:001 Section 16(7)(i)	FERC Audit Reports
30	807 KAR 5:001 Section 16(7)(j)	Stock or Bond Prospectus
31	807 KAR 5:001 Section 16(7)(k)	FERC Form 1
32	807 KAR 5:001 Section 16(7)(l)	Annual Reports to Stockholders (2 yrs.)
33	807 KAR 5:001 Section 16(7)(m)	Chart of Accounts
34	807 KAR 5:001 Section 16(7)(n)	12 months Managerial Reports
35	807 KAR 5:001 Section 16(7)(o)	Monthly Budget Variance Reports
36	807 KAR 5:001 Section 16(7)(p)	Utility 10-Ks, 8-Ks, 10-Qs
37	807 KAR 5:001 Section 16(7)(q)	Independent Auditor Opinion Report
38	807 KAR 5:001 Section 16(7)(r)	Quarterly Reports to Stockholders (5 qtrs.)
39/ Attachment JJS-1	807 KAR 5:001 Section 16(7)(s)	Depreciation Study Summary
40	807 KAR 5:001 Section 16(7)(t)	List of Computer Software, Hardware, etc.
41	807 KAR 5:001 Section 16(7)(u)	Affiliate Allocations/Charges
42	807 KAR 5:001 Section 16(7)(v)	Cost of Service Study
43	807 KAR 5:001 Section 16(7)(w)	Incumbent Local Exchange Carriers
44	807 KAR 5:001 Section 16(8)(a)	Financial Summaries
45	807 KAR 5:001 Section 16(8)(b)	Rate Base Summary
46	807 KAR 5:001 Section 16(8)(c)	Operating Income Statements
47	807 KAR 5:001 Section 16(8)(d)	Summary of Adjustments to Operating Income
48	807 KAR 5:001 Section 16(8)(e)	Federal and State Income Tax Summary
49	807 KAR 5:001 Section 16(8)(f)	Summary of Membership Dues
50	807 KAR 5:001 Section 16(8)(g)	Payroll Costs
51	807 KAR 5:001 Section 16(8)(h)	Gross Revenue Conversion Factor

52	807 KAR 5:001 Section 16(8)(i)	Comparative Income Statements
53	807 KAR 5:001 Section 16(8)(j)	Cost of Capital Summary
54	807 KAR 5:001 Section 16(8)(k)	Financial Data and Earnings Measures
55/ Schedule L, Vol. 12	807 KAR 5:001 Section 16(8)(l)	Narrative Description of Tariff Changes
56/ Schedule M, Vol. 12	807 KAR 5:001 Section 16(8)(m)	Revenue Summaries
57/ Schedule N, Vol. 12	807 KAR 5:001 Section 16(8)(n)	Typical Bill Comparison
60	807 KAR 5:001 Section 17(1)	Sample Notices Posted
61	807 KAR 5:001 Section 17(2)	Customer Notice Method
62	807 KAR 5:001 Section 17(3)	Proof of Notice
63	807 KAR 5:001 Section 17(4)	Customer Notice Content
Vol. 18-19	KRS 278.2203 and 278.2205	Cost Allocation Manual

22. Pursuant to KRS 278.192(1) and 807 KAR 5:001 Section 16(1)(a)(2), Duke Energy Kentucky has utilized a forward-looking test period for the twelve months ending March 31, 2021. This test period corresponds to the first twelve calendar month period the proposed rates will be in effect following the six-month suspension of the proposed rates.

23. The testimony and exhibits to this Application demonstrate that the rates, terms, conditions and tariffs proposed are fair, just, and reasonable under KRS 278.030.

New Tariffs/Services/Deferrals

24. Pursuant to the Commission's statutory rate-making authority to allow recovery of costs through fair, just, and reasonable rates embodied in KRS 278.180, KRS 278.192, and as confirmed by the Supreme Court of the Commonwealth of Kentucky in *Kentucky Public Service Comm'n v. Commonwealth ex rel. Conway*, 324 S.W.3d 373 (Ky. 2010), the Company is proposing to implement, without limitation, certain new programs, policies, and tariffs, and to modify existing policies and tariffs by:

- a. Duke Energy Kentucky is seeking, to the extent necessary and required under KRS 278.180, authorization and approval to offer an electric vehicle pilot program that includes Company ownership of a limited number of fast charging stations and incentives offered to residential and non-residential customers who invest in electric vehicle infrastructure;
- b. A single circuit 5.5 Mega-Watt (MW) distribution system battery storage pilot to study the benefits and potential reliability benefits for distribution-connected battery storage technologies;
- c. Revising the Rider PSM to include revenues associated with Company-owned electric vehicle charging stations;
- d. Proposing a new voluntary Green-Source Tariff Program for non-residential customers wishing to invest in renewable energy resources to meet sustainability goals;
- e. Proposing a transaction fee-free payment program for credit, debit and electronic check/automated clearing house (ACH) methods for our residential customers;
- f. Waivers for the Company's new Customer Information System;
- g. Authorization to perform hedging for forced generation outages;
- h. Eliminating tariffs that have previously been withdrawn, have expired, or are no longer in use; and
- i. Revising cogeneration tariffs;

Establishment of Regulatory Assets and Liabilities

25. As part of this proceeding, Duke Energy Kentucky is seeking Commission

authorization to create deferral mechanisms associated with its proposals to track actual costs of restoration for major storms incremental to amounts included in base rates. The deferral authority will allow the Company to debit or credit regulatory asset accounts when actual expenses for these costs in a year are under or over the amount established in base rates in this proceeding. Duke Energy Kentucky proposes to defer, with carrying charges based upon the Company's cost of debt, on an annual basis any such over recovery or under recovery and establish a regulatory liability or asset as may be required. Each year the incremental amount over or under what is established in base rates will be added or subtracted from the total balance deferred. Duke Energy Kentucky further proposes that any regulatory asset or liability created be reviewed for recovery through amortization as part of the Company's next base electric rate case.

26. Similarly, Duke Energy Kentucky requests authorization to create a deferral to establish a fund to provide incentives to encourage residential and non-residential, including schools, and metro-transportation customers, to invest in electric vehicles in the Company's territory.

27. Financial Accounting Standards Board Accounting Standards Codification (FASB Codification or ASC) requires utility management to defer and capitalize a current cost as a regulatory asset or a current obligation as a regulatory liability when in management's judgment the cost is probable of recovery, or the obligation is probable of refund in future ratemaking proceedings. Evidence of probable recovery includes orders from the regulatory authority specifically authorizing deferral of the current cost or current obligation for later review and recovery or refund through rates. Duke Energy Kentucky is requesting authorization in this case to permit its deferral of the above described costs that are

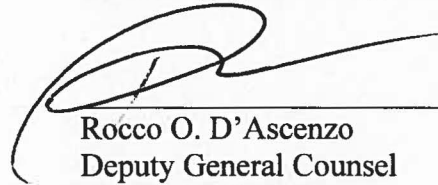
incremental to base rates, with carrying charges, with the recovery of any accumulated balances to be addressed in a future base rate proceeding.

WHEREFORE, Duke Energy Kentucky respectfully requests the Kentucky Public Service Commission to enter an Order:

1. Approving the new rates and new and revised tariff sheets for electric service;
2. Authorizing Duke Energy Kentucky to establish regulatory assets and liabilities to track and defer for future recovery major storm expense, incremental to amounts established in the rate case test period, including carrying charges;
3. Authorizing Duke Energy Kentucky to establish a regulatory asset for its electric vehicle pilot program incentives;
4. Approving the proposed amortization of the following new and existing regulatory assets:
 - a. Rate case-related expense;
 - b. November 2018 ice storm expense;
 - c. Any and all other requested or necessary deferrals;
5. Approving Duke Energy Kentucky's proposed depreciation rates;
6. Approving new tariffs and programs;
7. Approving the Company's proposed electric vehicle pilot;
8. Approving the Company's proposed distribution battery storage pilot; and
9. Granting all other waivers and relief to which Duke Energy Kentucky may be entitled.

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 September 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 overnighted to the Commission on the 3rd day of September, 2019 and a copy of the filing in paper medium is also being overnighted to the following:

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



Rocco O. D'Ascenzo