

**COMMONWEALTH OF KENTUCKY**  
**BEFORE THE PUBLIC SERVICE COMMISSION**

IN THE MATTER OF:

ELECTRONIC EMERGENCY DOCKET RELATED	)	CASE NO.
TO THE NOVEL CORONAVIRUS COVID-19	)	2020-00085

---

**MOTION FOR DEVIATION**

---

Comes now Citipwer, LLC (“Citipower”), by counsel, pursuant to 807 KAR 5:022 and 49 CFR Part 192.616 and other applicable law, and for its Motion requesting that the Kentucky Public Service Commission (“Commission”) grant a deviation from a portion of Citipower’s Public Awareness Plan, respectfully states as follows:

1. Citipower has a Public Awareness Plan on file with the Commission. Section 4: Message Type, Content and Frequency, states that Citipower will deliver the public awareness message in several different ways, including by mail and in-person delivery.

2. According to Section 4 of its Public Awareness Plan, Citipower must hand-deliver a copy of the public awareness message to each of the residents that are not Citipower customers that live in close proximity to Citipower’s pipeline. This requirement is normally completed during the months of September and October.

3. Due to the restrictions that have been put into place regarding social distancing for COVID-19, Citipower is requesting a deviation from the requirement to hand-deliver the public awareness message to the residents that are not Citipower customers that live in close proximity to Citipower’s pipeline this calendar year. Due to public safety concerns created by COVID-19,

Citipower does not want to place its employees or any of the residents in the position to have face-to-face contact with each other.

4. Citipower has mailed the public awareness messages to each of Citipower's customers in June and will provide an additional mailing to each of its customers in December. In addition to the mailings, Citipower's public awareness message is provided through cable television public service announcements regularly. Citipower will also be mailing the public awareness message to each contractor in Citipower's service territory in October.

5. Citipower will continue to follow and comply with all other items contained in Citipower's Public Awareness Plan.

WHEREFORE, on the basis of the foregoing, Citipower respectfully requests that the Commission grant a deviation from the requirement to provide a hand-delivered copy of Citipower's public awareness information to its customers for calendar year 2020.

This 2<sup>nd</sup> day of October, 2020.

Respectfully submitted,



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

*Counsel for Citipower, LLC*

**CERTIFICATE OF SERVICE**

In accordance with 807 KAR 5:001, Section 8, this is to certify that the electronically filed documents (including this "Read 1st" letter and its enclosures) are true and accurate copies of the same documents being filed in paper medium; that the electronic filing has been transmitted to the Commission on October 2, 2020; that there are currently no parties in this proceeding that the Commission has excused from participation by electronic means; and that the original versions of the documents transmitted electronically will be filed with the Commission in paper medium within thirty days of the state of emergency being lifted.

  
\_\_\_\_\_  
*Counsel for Citipower, LLC*