

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

THE ELECTRONIC APPLICATION OF CUMBERLAND)	
VALLEY ELECTRIC, INC. FOR A GENERAL ADJUSTMENT)	CASE NO.
OF RATES PURSUANT TO STREAMLINED PROCEDURE PILOT)	2020-00264
PROGRAM ESTABLISHED IN CASE NO. 2018-00407)	

MOTION FOR DEVIATION

Comes now Cumberland Valley Electric, Inc. (“Cumberland Valley”), by counsel, pursuant to 807 KAR 5:001 Section 17 and other applicable law, and for its Motion requesting that the Kentucky Public Service Commission (“Commission”) grant a deviation from a portion of the December 20, 2019 Order in Case No. 2018-00407, respectfully states as follows:

1. Cumberland Valley filed its Application in this matter on September 23, 2020.
2. Comments were filed by Cumberland Valley and the Attorney General on Monday, November 16, 2020. The case was submitted for decision on November 17, 2020.
3. Invoices for the rate case expense have been included except for the invoices for the month of October and November. Cumberland Valley requests a deviation from the requirement contained in the December 20, 2019 Order which states that invoices should be submitted by the date the case is submitted for decision. Cumberland Valley states that due to COVID-19 and some working remotely, the invoices for the month of October were sent to Cumberland Valley later than normal and therefore would be paid later than normal. Additional invoices for November will not be completed until after the end of November so they will not be submitted for recovery in this case.

4. Cumberland Valley requests to have the invoices for October, which are attached, included in the rate case expense for this case and to be granted a deviation to file the invoices after the date the case stood submitted for a decision, which is only a period of three days.

WHEREFORE, on the basis of the foregoing, Cumberland Valley respectfully requests that the Commission grant a deviation to allow recovery of the attached rate case invoices for the month of October.

This 20th day of November, 2020.

Respectfully submitted,

Mark David Goss

Mark David Goss
L. Allyson Honaker
GOSS SAMFORD, PLLC
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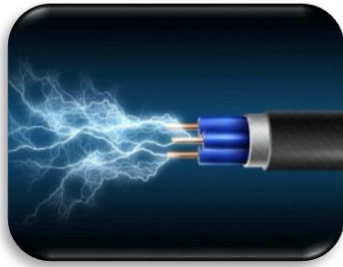
Counsel for Cumberland Valley Electric, Inc.

CERTIFICATE OF SERVICE

In accordance with 807 KAR 5:001, Section 8, this is to certify that the electronically filed documents (including this “Read1st” 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 November 20, 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.

Mark David Goss

Counsel for Cumberland Valley Electric, Inc.



CATALYST CONSULTING LLC

3308 Haddon Road
Louisville, KY 40241
(502) 599-1739
johnwolfram@catalystllc.com

November 15, 2020

Robert Tolliver
Office Manager
Cumberland Valley Electric, Inc.
P.O. Box 440
Gray, KY 40734

Dear Robert:

Enclosed please find the invoices for services provided by Catalyst Consulting LLC to CVE for the month of November 2020.

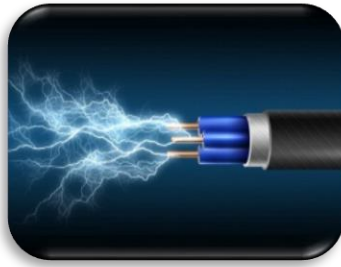
I appreciate the opportunity to work with CVE on this project. Please let me know if you have any questions. Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "John Wolfram". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

John Wolfram
Principal

Enclosure



CATALYST CONSULTING LLC

3308 Haddon Road
Louisville, KY 40241
(502) 599-1739
johnwolfram@catalystllc.com

INVOICE

Date: November 15, 2020	Invoice #: 201101
Client: Cumberland Valley Electric, Inc. P.O. Box 440 Gray, KY 40734 Attn: Robert Tolliver	Project: 2019 Cost of Service & Rate Review Case No. 2020-00264 For Services Provided in November 2020

	Item	Description	Qty	Rate	Amt
1	Consulting Services	John Wolfram – consulting support for 2019 Cost of Service & Rate Review. Prepare responses to Staff and AG data requests and all attachments. Review Comments. Calls or emails with CVE staff and counsel on same.	13.0 Hours	\$185.00	\$ 2,405.00
TOTAL					\$ 2,405.00

Please remit payment to Catalyst Consulting LLC at the address listed above. Thank you.

Goss Samford, PLLC

Suite B-325
2365 Harrodsburg Road
Lexington, KY 40504
Telephone: 859-368-7740

November 07, 2020

Invoice No. 5188

Cumberland Valley Electric, Inc.
Attn: Ted Hampton, President & CEO
6219 U.S. Highway 25 East
Gray, KY 40734

Client Number: 0700 Cumberland Valley Electric, Inc.
Matter: 1008 Cumberland Valley - 2020 Rate Adjustment
For Services Rendered Through 10/31/2020.

Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
10/1/2020	MDG	Receipt and review of order from KPSC in case re KOAG's right of intervention and related matters.	0.50	\$147.50
10/1/2020	LAH	Receipt and review of order from KPSC in case re KOAG's right of intervention and related matters.	0.50	\$125.00
10/6/2020	MDG	Review of KPSC electronic docket to determine if Commission action taken on CVE's request for streamlined rate case treatment.	0.20	\$59.00
10/7/2020	MDG	Receipt and review of several orders and filings from Commission and KOAG (extension of time to consider streamlined treatment, etc); conference with client re same.	1.20	\$354.00
10/7/2020	LAH	Review emails and attached filings and orders from the PSC and AG; conference with M. Goss re same.	1.00	\$250.00
10/8/2020	MDG	Telephone consultation with R. Tolliver to discuss recent KPSC Order extending time to consider streamlined case.	0.30	\$88.50
10/14/2020	MDG	Receipt and review of Order from KPSC accepting case for streamlined treatment; email exchanges with R. Tolliver re same.	0.70	\$206.50
10/14/2020	LAH	Receipt and review of Order from KPSC accepting case for streamlined treatment; review emails re same.	0.60	\$150.00

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10/16/2020	MDG	Telephone consultation with R. Tolliver re newspaper advertisement of customer notice.	0.20	\$59.00
10/27/2020	MDG	Telephone consultation with R. Tolliver re affidavits of publication and tear-sheets for use in 45-day notice of publication filing; telephone conference with A. Honaker re same.	0.40	\$118.00
10/27/2020	LAH	Telephone conference with M. Goss re proof of publication of customer notice filing and deadline for same.	0.20	\$50.00
10/29/2020	MDG	Telephone and email exchanges with R. Tolliver re newspaper publishing issues and need to prepare for 45-day notice of publication filing; email exchanges with A. Honaker re same.	0.70	\$206.50
10/29/2020	LAH	Exchange multiple emails with M. Goss re proof of publication; calendar deadline for same.	0.40	\$100.00
10/30/2020	MDG	Receipt and review of information requests from Commission Staff and KOAG; multiple telephone and email consultations with CVE rate team; organize and participate in telephone conference call with rate team and J. Wolfram to allocate responsibility for responses.	2.10	\$619.50
10/30/2020	DSS	Telephone conference with A. Honaker re publishers' affidavits; review same.	0.20	\$55.00
10/30/2020	LAH	Telephone conference with M. Goss re proof of publication filing; exchange emails re same; telephone conference with D. Samford re scanning newspaper notices; review and analyze data requests received from PSC and AG; exchange emails with M. Goss re same; begin draft of template for responses; telephone conference with rate case team re witness assignments.	3.50	\$875.00
10/31/2020	MDG	Telephone consultation with R. Tolliver to discuss responses to Commission Staff information requests.	0.20	\$59.00
10/31/2020	LAH	Review multiple emails re responses to data requests.	0.30	\$75.00
10/31/2020	LAH	Continue drafting templates for data request responses; review email from R. Tolliver re witness assignment changes.	1.00	\$250.00

Billable Hours / Fees: 14.20 \$3,847.50

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Timekeeper Summary

Timekeeper LAH worked 7.50 hours at \$250.00 per hour, totaling \$1,875.00.

Timekeeper MDG worked 6.50 hours at \$295.00 per hour, totaling \$1,917.50.

Timekeeper DSS worked 0.20 hours at \$275.00 per hour, totaling \$55.00.

Cost Detail

<u>Date</u>	<u>Description</u>	<u>Amount</u>
9/3/2020	Telephone conference charge.	\$23.76
9/21/2020	Telephone conference charge.	\$13.68
Total Costs		\$37.44

Payment Detail

<u>Date</u>	<u>Description</u>	<u>Amount</u>
10/23/2020	Check Number 82656 against Inv# 5167	(\$17,833.00)
10/23/2020	Check Number 82656 against Inv# 5167	(\$69.00)
10/23/2020	Check Number 82656 against Inv# 5167	(\$287.21)
Total Payments Received:		(\$18,189.21)

Current Invoice Summary

Prior Balance:	\$18,189.21	
Payments Received:	(\$18,189.21)	Last Payment: 10/23/2020
Unpaid Prior Balance:	\$0.00	
Current Fees:	\$3,847.50	
Advanced Costs:	\$37.44	
TOTAL AMOUNT DUE:	\$3,884.94	