

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matters of:

ELECTRONIC APPLICATION OF KENTUCKY	)	
UTILITIES CO. FOR AN ADJUSTMENT OF ITS	)	
ELECTRIC RATES, A CERTIFICATE OF PUBLIC	)	CASE No.
CONVENIENCE AND NECESSITY TO DEPLOY	)	2020-00349
ADVANCED METERING INFRASTRUCTURE,	)	
APPROVAL OF CERTAIN REGULATORY AND	)	
ACCOUNTING TREATMENTS, AND ESTABLISH-	)	
MENT OF A ONE-YEAR SURCREDIT	)	

-and-

ELECTRONIC APPLICATION OF LOUISVILLE	)	
GAS & ELECTRIC CO. FOR AN ADJUSTMENT	)	
OF ITS ELECTRIC AND GAS RATES, A CERTIFI-	)	
CATE OF PUBLIC CONVENIENCE AND NECESSITY	)	CASE No.
TO DEPLOY ADVANCED METERING INFRA-	)	2020-00350
STRUCTURE, APPROVAL OF CERTAIN	)	
REGULATORY AND ACCOUNTING TREATMENTS,	)	
AND ESTABLISHMENT OF A ONE-YEAR SURCREDIT	)	

**ATTORNEY GENERAL’S MOTION FOR PARTIAL DEVIATION**

The Attorney General of the Commonwealth of Kentucky, through his Office of Rate Intervention (“the AG”), requests a partial deviation from the electronic filing procedures set forth in 807 KAR 5:001 § 8 (3) and (12)(a), which require a paper copy of electronically filed documents to be filed with the Commission, and from the Commission’s Procedural Order in the above-styled cases. In support of this motion, the AG states as follows.

On March 5, 2020 the AG filed the direct testimony of witness Mr. Lane Kollen, sponsored jointly by the AG and Kentucky Industrial Utility Customers (“KIUC,” referred

to jointly as “AG-KIUC”) into the records of the two above-styled matters, pursuant to the Commission’s electronic filing procedures set forth in 807 KAR 5:001 § 8. This filing consisted of Mr. Kollen’s actual testimony and exhibits, both in .PDF format. However, Mr. Kollen’s testimony also has seven (7) workpapers in their native Microsoft Excel format. As Mr. Kollen’s worksheets are in their native Excel format, they would be rendered nearly unidentifiable and not readily usable if printed.

Once the Governor lifts the current state of emergency, the AG-KIUC propose to file original hard copies of Mr. Kollen’s testimony and exhibits, which have been electronically uploaded and are fully accessible on the Commission’s website for the Commission and the parties to review. Mr. Kollen’s Excel workpapers are also currently fully accessible to the parties and to Commission Staff through the Commission’s website. The titles of the specific documents for which the AG-KIUC seek such deviation are listed in the attached “APPENDIX A” to this filing, and are applicable identically to both Case Nos. 2020-00349 and 2020-00350.

WHEREFORE, the AG-KIUC respectfully request that the Commission grant their motion for partial deviation.

Respectfully submitted,

DANIEL CAMERON  
ATTORNEY GENERAL



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***Certificate of Service***

Pursuant to the Commission's Orders in Case No. 2020-00085, and in accord with all other applicable law, Counsel certifies that an electronic copy of the forgoing was served and filed by e-mail to the parties of record. Further, the Attorney General will submit the paper originals of the foregoing to the Commission within 30 days after the Governor lifts the current state of emergency.

This 5<sup>th</sup> day of March, 2021










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Assistant Attorney General

## APPENDIX A

Case Nos. 2020-00349 and 2020-00350

-  AG-KIUC Changes to KU Schedule J-3 - KOLLEN workpaper
-  AG-KIUC Changes to LG&E Schedule J-3 - KOLLEN workpaper
-  AG-KIUC Summary of KU Revenue Requirement - KOLLEN workpaper
-  AG-KIUC Summary of LG&E Revenue Requirement - KOLLEN workpaper
-  Early Retirement Levelized Rev Requirement - vs Securitization - KOLLEN workpaper
-  Exhibit\_\_(LK-2) - KU and LG&E Coal Unit Depr Rates and Expense - KOLLEN workpaper
-  KU and LG&E Plants - Early Retirement Analysis - KOLLEN workpaper