

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

In the Matter of:

ELECTRONIC APPLICATION OF)	
LOUISVILLE GAS AND ELECTRIC)	
COMPANY FOR AN ADJUSTMENT OF ITS)	CASE NO. 2020-00350
ELECTRIC AND GAS RATES, A)	
CERTIFICATE OF PUBLIC CONVENIENCE)	
AND NECESSITY TO DEPLOY ADVANCED)	
METERING INFRASTRUCTURE,)	
APPROVAL OF CERTAIN REGULATORY)	
AND ACCOUNTING TREATMENTS, AND)	
ESTABLISHMENT OF A ONE-YEAR)	
SURCREDIT)	

JOINT MOTION FOR LEAVE TO FILE
SUR-REBUTTAL TESTIMONY

Kentucky Utilities Company (“KU”) and Louisville Gas and Electric Company (“LG&E”) (collectively “Companies”) hereby respectfully move the Commission to grant the Companies leave to file the attached sur-rebuttal testimony in these proceedings.

As the applicants in these proceedings, the Companies bear the burden of proof, and therefore respectfully request the opportunity to address entirely new information contained in the Supplemental Rebuttal Testimony of Justin R. Barnes on behalf of Kentucky Solar Industries Association, Inc., filed on August 5, 2021 and beginning at page 18, line 3 and concluding at page 20 line 3. This section of Mr. Barnes testimony does not rebut the Supplemental Testimony filed

by the Companies on July 13, 2020. Instead, it offers additional support for a previous argument by Mr. Barnes for a “better method for determining avoided capacity cost rates for riders SQF and LQF.” Specifically, at pages 18 through 20, Mr. Barnes now provides for the first time a new calculation of his “proxy unit method” based on the cost of natural gas cycle unit spread over 791 hours in the summer to present an avoided cost rate. Mr. Barnes first presented this proxy unit method argument in his March 5, 2021 direct testimony but omitted the calculation and detailed hours now included in the rebuttal testimony to support his contention.¹ In his July 13, 2021 Supplemental Testimony, Mr. Barnes continued to express his general support for this recommendation but made no specific mention of his proxy unit methodology argument and did not provide further support for or any calculation of it.²

The Companies do not believe that allowing sur-rebuttal testimony will prejudice the Commission’s investigation. Indeed, permitting the Companies to file the attached sur-rebuttal testimony consisting of only ten pages of text (excluding exhibits), is required for due process, should help focus testimony at hearing on these issues and provide the Commission a more complete and effective record.

WHEREFORE, the Companies respectfully move the Commission for leave to file the attached sur-rebuttal testimony in these proceedings.

¹ *Direct Testimony of Justin R. Barnes on Behalf of Kentucky Solar Industries Association, Inc.*, Case No. 2020-00349, pp. 4, 20 - 21; *Direct Testimony of Justin R. Barnes on Behalf of Kentucky Solar Industries Association, Inc.*, Case No. 2020-00350, pp. 4, 20-21.

² *Supplemental Testimony of Justin R. Barnes on Behalf of Kentucky Solar Industries Association, Inc.*, Case Nos. 2020-00249 and 2020-00350, p. 16.

Dated: August 13, 2021

Respectfully submitted,




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CERTIFICATE OF COMPLIANCE

In accordance with the Commission's Order of July 22, 2021 in Case No. 2020-00085 (Electronic Emergency Docket Related to the Novel Coronavirus COVID-19), this is to certify that the electronic filing has been transmitted to the Commission on August 13, 2021; and that there are currently no parties in this proceeding that the Commission has excused from participation by electronic means.



Gerald R. Rigg
Counsel for Kentucky Utilities Company
and Louisville Gas and Electric Company