

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 CERTIFICATE OF)
PUBLIC CONVENIENCE AND NECESSITY TO)
DEPLOY ADVANCED METERING) Case No. 2020-00349
INFRASTRUCTURE, APPROVAL OF CERTAIN)
REGULATORY AND ACCOUNTING)
TREATMENTS AND ESTABLISHMENT OF)
A ONE YEAR SUR-CREDIT)

And

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

**MOTION FOR LEAVE TO FILE REVISED DIRECT TESTIMONY OF KARL R.
RÁBAGO ON BEHALF OF JOINT INTERVENORS**

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Energy Society In Case No. 2020-00349 and

Metropolitan Housing Coalition,
Kentuckians for the Commonwealth, and
Kentucky Solar Energy Society in Case No.
2020-00350

March 19, 2021

Come the Joint Intervenors, by counsel, and respectfully move the Commission for leave to file the attached tendered *Revised Direct Testimony Of Karl R. Rábago On Behalf of Joint Intervenors*.

In support of this Motion, Joint Intervenors state as follows:

1. After the filing of the *Direct Testimony Of Karl R. Rábago On Behalf of Joint Intervenors*, Counsel for LG&E and KU wrote to request that the portions of the Direct Testimony that referenced and incorporated by reference testimony of other witnesses in Case No. 2020-00174, be removed or that Joint Intervenors seek leave of the Commission pursuant to 807 KAR 5:001 Section 11(5)(a).

2. In response, the text of Footnote 5 on Page 5 of the *Direct Testimony Of Karl R. Rábago On Behalf of Joint Intervenors* has been revised for clarity of the reference, and Lines 8 through 12 on Page 6 have been removed.

3. Counsel for LG&E and KU has been consulted on these revisions and has indicated no opposition to same.

4. The Exhibits to the *Direct Testimony Of Karl R. Rábago On Behalf of Joint Intervenors* have not changed and are attached to the tendered *Revised Direct Testimony Of Karl R. Rábago On Behalf of Joint Intervenors*.

Wherefore, for the reasons stated herein, Joint Intervenors respectfully request that the tendered *Revised Direct Testimony Of Karl R. Rábago On Behalf of Joint Intervenors* be accepted in place of the original *Direct Testimony Of Karl R. Rábago On Behalf of Joint Intervenors*.

Respectfully submitted,



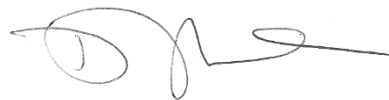
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Certificate of Service

This is to certify that the electronic version of the foregoing *Motion For Leave To File Revised Direct Testimony Of Karl R. Rábago On Behalf of Joint Intervenors*, along with the tendered filing, is a true and accurate copy of the same document that will be filed in paper medium; that the electronic filing has been transmitted to the Commission on March 19, 2021; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and that in accordance with the March 16, 2020 Commission Order in Case No. 2020-00085 an original and ten copies in paper medium of this filing will not be mailed until after the lifting of the current state of emergency.



Tom FitzGerald