

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 Attorney General”), requests a partial deviation from: (i) the electronic filing procedures set forth in 807 KAR 5:001 § 8, in general; (ii) 807 KAR 5:0001 § 8 (3) and (12)(a), which require a paper copy of electronically filed documents to be filed with the Commission; and (iii) from the Commission’s Procedural Order in the above-styled cases, requiring that the original paper filing to be filed with the Commission once the Governor lifts the current state of emergency. In support of this motion, the Attorney General states as follows.

On March 4, 2020 the Attorney General filed the direct testimony of his witness Glenn Watkins in 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. Watkins' actual testimony and his schedules, both in .PDF format. However, Mr. Watkins also has forty-eight (48) workpapers in their native Microsoft Excel format, many of which are quite large. At the time undersigned counsel uploaded Mr. Watkins' testimony and schedules to the Commission website, he also attempted several times to upload Mr. Watkins' Excel workpapers, but for an unknown reason the Commission's website would not accept the Excel workpapers for filing.

In an effort to provide the parties with full access to these workpapers, the Attorney General contacted counsel for Louisville Gas & Electric Co. and Kentucky Utilities Co. ("LG&E-KU," or "the Companies"), who has allowed the workpapers to be uploaded to a secure website which LG&E-KU's counsel had previously made available to the parties and Commission Staff.¹ Furthermore, the Attorney General proposes to submit these workpapers on a portable hard drive to Commission Staff to be made a part of the official record in these two proceedings. In prior cases, the Commission has granted similar motions for deviation from the Commission's filing requirements, thus allowing movants to file electronic documents too large for the Commission's website to accommodate.

Additionally, the Attorney General seeks deviation from the provisions of 807 KAR 5:0001 § 8 (3) and (12)(a), and the Commission's procedural order in the above-styled matters which require one hard copy of filings to be filed. Mr. Watkins' worksheets are in their native Excel format, and as such, would be rendered nearly unidentifiable and not

¹ It is the undersigned counsel's understanding that all parties in these two proceedings have access to this secure website.

readily usable if printed. Moreover, doing so would require over 50,000 pages, and an untold number of binders and bankers boxes within which to transport them. The Attorney General does not have the resources necessary to accomplish such an undertaking without going to extraordinary effort and incurring unnecessary expenses.

Once the Governor lifts the current state of emergency, the Attorney General intends to file the original of Mr. Watkins testimony and schedules, which have been electronically uploaded and are fully accessible on the Commission's website for the Commission and the parties to review. Mr. Watkins' Excel workpapers are currently accessible to the parties and to Commission Staff through the website provided by counsel for the Companies, and the provision of these documents to Commission Staff via a portable hard drive will allow them to become part of the official record in these two cases. The titles of the specific documents for which the Attorney General seeks such deviation are listed in case-specific headings in the attached "APPENDIX A" to this filing.

WHEREFORE, the Attorney General respectfully requests that the Commission grant his motion for partial deviation: (i) to allow for the submission of these documents into the official records in these matters, in their native Excel format via a portable hard drive; and (ii) to deviate from the requirement that a paper copy of the documents be filed once the Governor has lifted the current state of emergency.

Respectfully submitted,

DANIEL CAMERON
ATTORNEY GENERAL



LAWRENCE W. COOK
J. MICHAEL WEST
ANGELA M. GOAD
JOHN G. HORNE II
ASSISTANT ATTORNEYS GENERAL
1024 CAPITAL CENTER DR., STE. 200
FRANKFORT, KY 40601
(502) 696-5453
FAX: (502) 573-1005
Larry.Cook@ky.gov
Michael.West@ky.gov
Angela.Goad@ky.gov
John.Horne@ky.gov

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 5th day of March, 2021

























Assistant Attorney General

APPENDIX A

Case Nos. 2020-00349 and 2020-00350

-  Forecasted Hourly Fuel Cost
-  Historic Hourly Fuel Cost
-  KU - BIP - Cust Demand CCOSS
-  KU - BIP - prim 100% Demand CCOSS
-  KU - Prob Dispatch - Forecasted - Market Based - Cust Demand CCOSS
-  KU - Prob Dispatch - Forecasted - Market Based - prim 100% Demand CCOSS
-  KU - Prob Dispatch - Forecasted - Pro Rata - Cust Demand CCOSS
-  KU - Prob Dispatch - Forecasted - Pro Rata - prim 100% Demand CCOSS
-  KU - Prob Dispatch - Historic - Market Based - Cust Demand CCOSS
-  KU - Prob Dispatch - Historic - Market Based - prim 100% Demand CCOSS
-  KU - Prob Dispatch - Historic - Pro Rata - Cust Demand CCOSS
-  KU - Prob Dispatch - Historic - Pro Rata - prim 100% Demand CCOSS
-  KU Customer Density Analysis
-  KU, LGE Electric & Gas Customer Cost Analyses
-  LGE Customer Density Analysis
-  LGE Electric - BIP - 100% prim Demand CCOSS
-  LGE Electric - BIP Cust Demand CCOSS
-  LGE Electric - Prob Dispatch - Forecasted - Market Based - 100% prim Demand CCOSS
-  LGE Electric - Prob Dispatch - Forecasted - Market Based - Cust Demand CCOSS
-  LGE Electric - Prob Dispatch - Forecasted - Pro Rata - 100% prim Demand CCOSS
-  LGE Electric - Prob Dispatch - Forecasted - Pro Rata - Cust Demand CCOSS
-  LGE Electric - Prob Dispatch - Historic - Pro Rata - 100% prim Demand CCOSS
-  LGE Electric - Prob Dispatch - Historic - Pro Rata - Cust Demand CCOSS
-  LGE Electric - Prob Dispatch - Historic Mkt Based - 100% prim Demand CCOSS
-  LGE Electric - Prob Dispatch - Historic Mkt Based - Cust Demand CCOSS
-  LGE Gas - Mains 100% demand CCOSS

-  LGE Gas - Mains P&A CCOSS
-  LGE Gas - P&A Allocator
-  Load Curve & 90% of total LOLP
-  LOLP Sorted by system Load
-  OAG - KU Revenue Distribution
-  OAG - LG&E Electric Revenue Distribution
-  OAG & Seelye LGE Gas Revenue Distribution
-  **POD - Forecasted Depr. Expense - Mkt. Value**
-  POD - Forecasted Depr. Expense - Pro Rata
-  POD - Forecasted Depr. Reserve - Mkt. Value
-  POD - Forecasted Depr. Reserve - Pro Rata
-  POD - Forecasted GPlant - Mkt. Value
-  POD - Forecasted GPlant - Pro Rata
-  POD - Historic - Depr. Expense - Pro Rata
-  POD - Historic - Depr. Reserve - Pro Rata
-  POD - Historic - GPlant - Mkt Value
-  POD - Historic - GPlant - Pro Rata
-  POD - Historic Depr. Expense - Mkt Value
-  POD - Historic Depr. Reserve - Mkt Value
-  Schedule GAW-2 - Generation Assets
-  Schedule GAW-17 - TAI BIP Classification
-  Schedule GAW-25 and Schedule GAW-30 - Customer Cost Analysis