

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

The Electronic Application of Duke)
Energy Kentucky, Inc., for: 1) An)
Adjustment of the Natural Gas Rates; 2)) Case No. 2021-00190
Approval of New Tariffs; 3) All Other)
Required Approvals and Relief.)

**DUKE ENERGY KENTUCKY, INC.'S APPLICATION FOR AUTHORITY TO
ADJUST NATURAL GAS RATES, APPROVAL OF NEW TARIFFS, AND FOR
ALL OTHER REQUIRED APPROVALS AND RELIEF**

Applicant, Duke Energy Kentucky, Inc., (Duke Energy Kentucky or the Company), pursuant to KRS 278.180, KRS 278.190, KRS 278.192, 278.509, 807 KAR 5:001 Section 14 and Section 16, and other applicable law, hereby applies to the Kentucky Public Service Commission (Commission) for authority to adjust its natural gas rates, approval of new tariffs, and for all other required approvals and relief (collectively this Application).

As set forth in the Company's Notice of Intent filed on April 30, 2021, in accordance with KRS 278.180(1), KRS 278.192, and 807 KAR 5:001, Section 16(2), this Application is supported by a fully forecasted test period consisting of the twelve months ending December 31, 2022. The Notice of Intent was served upon the Attorney General of the Commonwealth of Kentucky, Office of Rate Intervention. A copy of the Notice of Intent is attached hereto at Vol. 1, Tab 1 of the filing requirements.

In support of this Application, Duke Energy Kentucky respectfully states as follows:

Introduction

1. Duke Energy Kentucky is a “utility” as defined in KRS 278.010(3) and is subject to the Commission’s jurisdiction pursuant to KRS 278.040. In accordance with 807 KAR 5:001, Section 14(1), Duke Energy Kentucky is a Kentucky corporation with its principal office and principal place of business at 139 East Fourth Street, Cincinnati, Ohio 45202. The Company’s local office in Kentucky is Duke Energy Erlanger Operations Center, 1262 Cox Road, Erlanger, Kentucky 41018. The Company further states that its electronic mail address for purposes of this matter is KYfilings@duke-energy.com.

2. Duke Energy Kentucky is a utility engaged in the natural gas and electric business. Duke Energy Kentucky purchases, sells, stores and transports natural gas in Boone, Bracken, Campbell, Gallatin, Grant, Kenton and Pendleton counties, Kentucky. Duke Energy Kentucky also generates electricity, which it distributes and sells in Boone, Campbell, Grant, Kenton and Pendleton counties.

3. Pursuant to 807 KAR 5:001, Section 14(2), Duke Energy Kentucky states that it was originally incorporated in the Commonwealth of Kentucky on March 20, 1901, and attests that it is currently in good standing in said Commonwealth. Pursuant to 807 KAR 5:001, Section 14(2), a certified copy of Duke Energy Kentucky’s certificate of good standing from the Kentucky Secretary of State is attached at Volume 1, Tab 5, of this filing, and is incorporated by reference. Duke Energy Kentucky has on file with the Office of the Secretary of State a certificate for the following assumed name: “Duke Energy.” The required certificate of assumed name is attached at Volume 1, Tab 9 of this filing, and is incorporated by reference.

4. This Application constitutes notice to the Commission pursuant to KRS 278.180(1) of the changes proposed to be made to Duke Energy Kentucky's natural gas rates. Duke Energy Kentucky's Statutory Notice is attached to this Application. Duke Energy Kentucky is filing its Certificate of Notice to the public of the changes in its tariffs that result in increased rates, which Certificate is attached hereto at Volume 1, Tab 12 of this Application.

5. Pursuant to 807 KAR 5:001 Section 8, on April 30, 2021, Duke Energy Kentucky filed with the Commission, its notice of intent to use electronic filing procedures in this proceeding. Copies of all orders, pleadings and other communications related to this proceeding should be directed to:

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Adjustment of Natural Gas Rates

6. Duke Energy Kentucky's present natural gas rates and charges, which are based on forecasted costs for the twelve months ended March 31, 2020, were authorized by this Commission by Order dated March 27, 2019, in Case No. 2018-00261.¹

7. In accordance with the provisions of KRS 278.180, KRS 278.190, and KRS 278.192, Duke Energy Kentucky requests Commission approval of a change in existing rates, based upon rate base, approval of new tariffs, and changes in terms, conditions and tariffs for natural gas service. Duke Energy Kentucky proposes to implement and change its existing rates and tariffs to those rates and charges set forth in the proposed tariff(s) attached hereto at Schedule L contained in Volume 12 of this Application. A comparison of the present and proposed rates and charges is attached hereto in the notice contained in Volume 1, Tab 12 and in Volume 12, Schedule L of this Application.

8. Aside from minimum use agreements related to natural gas line extensions, Duke Energy Kentucky currently has no special contracts for natural gas service.

9. Duke Energy Kentucky seeks to adjust its natural gas base rates to a new total of \$126,681,920 million, which reflects an increase from its current rates of approximately \$15.2 million. The increase in base rates takes into account the offsetting impact of cost-effective energy efficiency in terms of adjustments to the Company's load forecast as used in its Application. The monthly residential natural gas bill increase (total bill) due to the proposed natural base rates will be approximately 12.7 percent or

¹ *In the Matter of the Electronic Application of Duke Energy Kentucky, Inc. for Authority to 1) Adjust Natural Gas Rates; 2) Approval of a Decoupling Mechanism; 3) Approval of New Tariffs; and 4) All Other Required Approvals, Waivers, and Relief*, Case No. 2018-00261, Ky P.S.C. March 27, 2019.

approximately \$8.77 for a customer using 57 Ccf of natural gas (the average monthly consumption of a Duke Energy Kentucky residential customer). The amounts of the proposed new total rates are at Volume 11 Schedule A, of this filing, and are incorporated by reference. The proposed new charges and the impact of the proposed adjustment on the typical bill for each customer class are provided at Volume 12, Schedule N of this Application, and are incorporated by reference. Duke Energy Kentucky states that it will implement this adjustment effective January 1, 2022.

10. In its Application, as further detailed below, Duke Energy Kentucky is proposing clarifying language changes to several tariffs and service regulations, as well as, to establish and implement a new mechanism, the Governmental Mandate Adjustment mechanism (Rider GMA) to enable the Company to implement and respond to governmental directives/mandates impacting the utility, including changes in federal or state tax rates and regulations promulgated by the U.S. Department of Transportation, Pipeline and Hazardous Materials Safety Administration (PHMSA).

Support for Change in Existing Rates and Tariffs

11. In accordance with 807 KAR 5:001 Section 16(1)(b)(1), Duke Energy Kentucky states that the primary reason for this requested change in rates, terms, conditions and tariffs is that Duke Energy Kentucky's earned rate of return on rate base obtained from its current natural gas operations is 4.62 percent, which makes it extremely difficult for the Company to continue providing safe, reasonable, adequate, and reliable service to its customers and is insufficient to afford Duke Energy Kentucky a reasonable opportunity to earn a fair return on its investment property that is used to provide such service while attracting necessary capital at reasonable rates.

12. In accordance with 807 KAR 5:001 Section 16(1)(b)(1), a more detailed statement of the reasons for the adjustment is provided in the direct testimony of Company witnesses Ms. Amy B. Spiller, Ms. Sarah E. Lawler, and Mr. Jay P. Brown, as well as others, filed contemporaneously with this Application, and incorporated by reference.

13. Duke Energy Kentucky certifies that its annual reports, including the annual report for year ending December 31, 2020, are on file with this Commission as required by 807 KAR 5:006, Section 4(1).

14. The aggregate total revenue from Duke Energy Kentucky's non-regulated incidental activities exceeds the lesser of 2 percent of Duke Energy Kentucky's total revenue or \$1 million, annually; therefore, Duke Energy Kentucky is required under KRS 278.2203 and KRS 278.2205 to submit a cost allocation manual (CAM) with this filing. The Company periodically submits its CAM to the Commission when material changes are made. The Company last provided the Commission with a copy of its CAM by electronic delivery on March 31, 2021. A copy of the current CAM is included in Volumes 17 – 18 of this filing and is incorporated by reference.

15. Pursuant to 807 KAR 5:001, Section 16(1)(b)(8), Duke Energy Kentucky states that its proposed tariffs and proposed tariff changes are provided at Volume 12, Schedule L of this filing, and is incorporated by reference. The effective date of the proposed tariffs and proposed tariff changes is January 1, 2022.

16. Pursuant to 807 KAR 5:001, Section 16(1)(b)(5), Duke Energy Kentucky states that it has complied with 807 KAR 5:011, Section 16(2) and 807 KAR 5:001, Sections 17(3) and (4) by delivering to the newspapers of general circulation in its service

territory area a copy of a Legal Notice for publishing once a week for three consecutive weeks in a prominent manner, the first of said publications to be made no later than the date this application is filed with the Commission. A copy of the Legal Notice is attached at Volume 1, Tab 12, of this Application, Notice and Statement, and is incorporated by reference. Duke Energy Kentucky states that it will implement this adjustment effective January 1, 2022.

17. Pursuant to 807 KAR 5:001, Section 17, Duke Energy Kentucky states that it has filed with the Executive Director of this Commission a written notice of its intention to file this application and emailed a copy to the Utility Intervention and Rate Division of the Attorney General's office. A copy of the written notice is attached at Volume 1, Tab 1, of this filing, and is incorporated by reference.

18. Pursuant to 807 KAR 5:001, Section 17, Duke Energy Kentucky states that it will post a copy of this filing at its place of business on the date on which this Application is filed and it will remain posted until this Commission has finally determined Duke Energy Kentucky's natural gas rates and will also be posted, within five business days of the date of filing this Application with the Commission, on Duke Energy Kentucky's website www.duke-energy.com which will contain a hyperlink to the Commission's website where this Application can be viewed.

19. Pursuant to 807 KAR 5:001, Section 12, Duke Energy Kentucky states that its financial exhibit is provided at Volume 1, Tab 3, of this filing, and is incorporated by reference.

20. Duke Energy Kentucky supports its request for a change in existing rates and tariffs for natural gas service with the verified testimony and attachments of the

following:

- a. Amy B. Spiller, State President, Duke Energy Kentucky;
- b. Chris R. Bauer, Director, Corporate Finance – Assistant Treasurer;
- c. Jay P. Brown, Director, Rates & Regulatory Planning;
- d. Dylan W. D’Ascendis, ScottMadden Management Consultants;
- e. Retha I. Hunsicker, Vice President, Customer Connect-Solutions;
- f. Jeff L. Kern, Rates & Regulatory Strategy Manager;
- g. Sarah E. Lawler, Vice President, Rates & Regulatory Strategy
OH/KY;
- h. Brian T. Manges, Director, Gas Utility & Infrastructure;
- i. Abby L. Motsinger, Director, Jurisdictional Forecasting,
- j. John R. Panizza, Director, Tax Operations;
- k. Benjamin W. Passty Ph.D., Lead Load Forecasting Analyst;
- l. Lesley G. Quick, Vice President Strategic Planning, Governance &
Technology;
- m. David G. Raiford, Manager Accounting I;
- n. Jeffrey R. Setser, Director of Allocations and Reporting;
- o. John J. Spanos, Gannet Fleming Valuation and Rate Consultants,
LLC;
- p. Jake J. Stewart, Director Compensation;
- q. Brian R. Weisker, Senior Vice President, Chief Operating Officer
Natural Gas; and,
- r. James E. Ziolkowski, Director, Rates and Regulatory Planning.

21. Duke Energy Kentucky further supports its request for a change in its existing rates and tariffs for natural gas service with the following attachments complying with the requirements of 807 KAR 5:001, Sections 14, 16, and 17:

Tab	Filing Requirement	Description
4	807 KAR 5:001 Section 14(1)	Name, Address, Facts
5	807 KAR 5:001 Section 14(2)	Corporation in good standing
6	807 KAR 5:001 Section 14(3)	LLC- in good standing
7	807 KAR 5:001 Section 14(4)	LP- Agreement
8	807 KAR 5:001 Section 16(1)(b)(1)	Reason for Rate Adjustment
9	807 KAR 5:001 Section 16(1)(b)(2)	Certificate of Assumed Name
10/ Also Schedule L, Tab 55	807 KAR 5:001 Section 16(1)(b)(3)	New/revised Tariff w/ effective date
11/ Also Schedule L, Tab 55	807 KAR 5:001 Section 16(1)(b)(4)	Proposed Tariff Changes
12	807 KAR 5:001 Section 16(1)(b)(5)	Statement about Customer Notice
13	807 KAR 5:001 Section 16(2)	Notice of Intent
14	807 KAR 5:001 Section 16(3)	Compliance with 807 KAR 5:051, Section 2
15	807 KAR 5:001 Section 16(6)(a)	Financial Data
16	807 KAR 5:001 Section 16(6)(b)	Forecasted Adjustments
17	807 KAR 5:001 Section 16(6)(c)	Capitalization and Rate Base
18	807 KAR 5:001 Section 16(6)(d)	No Revisions to Forecast
19	807 KAR 5:001 Section 16(6)(e)	Alternative Forecast
20	807 KAR 5:001 Section 16(6)(f)	Reconciliation of Rate Base and Capital
21/ Testimony Vol. 14-16	807 KAR 5:001 Section 16(7)(a)	Testimony
22	807 KAR 5:001 Section 16(7)(b)	Capital Construction Budget
23	807 KAR 5:001 Section 16(7)(c)	Description of Factors Supporting Forecast
24	807 KAR 5:001 Section 16(7)(d)	Annual and Monthly Budgets
25	807 KAR 5:001 Section 16(7)(e)	Attestation
26	807 KAR 5:001 Section 16(7)(f)	Major Construction Projects
27	807 KAR 5:001 Section 16(7)(g)	Other Construction Projects
28	807 KAR 5:001 Section 16(7)(h)	Financial Forecasts
28	807 KAR 5:001 Section 16(7)(h)(1)	Operating Income Statement

28	807 KAR 5:001 Section 16(7)(h)(2)	Balance Sheet
28	807 KAR 5:001 Section 16(7)(h)(3)	Statement of Cash Flows
28	807 KAR 5:001 Section 16(7)(h)(4)	Revenue Requirements
28	807 KAR 5:001 Section 16(7)(h)(5)	Load Forecast
28	807 KAR 5:001 Section 16(7)(h)(6)	Access Line Forecast (telephone)
28	807 KAR 5:001 Section 16(7)(h)(7)	Mix of Generation
28	807 KAR 5:001 Section 16(7)(h)(8)	Mix of Gas Supply
28	807 KAR 5:001 Section 16(7)(h)(9)	Employee Level
28	807 KAR 5:001 Section 16(7)(h)(10)	Labor Cost Changes
28	807 KAR 5:001 Section 16(7)(h)(11)	Capital Structure Requirement
28	807 KAR 5:001 Section 16(7)(h)(12)	Rate Base
28	807 KAR 5:001 Section 16(7)(h)(13)	Gallons of Water to be sold
28	807 KAR 5:001 Section 16(7)(h)(14)	Customer Forecast (gas/water)
28	807 KAR 5:001 Section 16(7)(h)(15)	Sales Volume Forecast (gas)
28	807 KAR 5:001 Section 16(7)(h)(16)	Toll and Access Forecast (telephone)
28	807 KAR 5:001 Section 16(7)(h)(17)	A Detailed Explanation of Other Info.
29	807 KAR 5:001 Section 16(7)(i)	FERC Audit Reports
30	807 KAR 5:001 Section 16(7)(j)	Stock or Bond Prospectus
31	807 KAR 5:001 Section 16(7)(k)	FERC Form 2
32	807 KAR 5:001 Section 16(7)(l)	Annual Reports to Stockholders (2 yrs.)
33	807 KAR 5:001 Section 16(7)(m)	Chart of Accounts
34	807 KAR 5:001 Section 16(7)(n)	12 months Managerial Reports
35	807 KAR 5:001 Section 16(7)(o)	Monthly Budget Variance Reports
36	807 KAR 5:001 Section 16(7)(p)	Utility 10-Ks, 8-Ks, 10-Qs
37	807 KAR 5:001 Section 16(7)(q)	Independent Auditor Opinion Report
38	807 KAR 5:001 Section 16(7)(r)	Quarterly Reports to Stockholders (5 qtrs.)
39/ Attachment JS-1	807 KAR 5:001 Section 16(7)(s)	Depreciation Study Summary
40	807 KAR 5:001 Section 16(7)(t)	List of Computer Software, Hardware, etc.
41	807 KAR 5:001 Section 16(7)(u)	Affiliate Allocations/Charges
42	807 KAR 5:001 Section 16(7)(v)	Cost of Service Study
43	807 KAR 5:001 Section 16(7)(w)	Incumbent Local Exchange Carriers
44/ Vol. 11	807 KAR 5:001 Section 16(8)(a)	Financial Summaries

45/ Vol. 11	807 KAR 5:001 Section 16(8)(b)	Rate Base Summary
46/ Vol. 11	807 KAR 5:001 Section 16(8)(c)	Operating Income Statements
47/ Vol. 11	807 KAR 5:001 Section 16(8)(d)	Summary of Adjustments to Operating Income
48/ Vol. 11	807 KAR 5:001 Section 16(8)(e)	Federal and State Income Tax Summary
49/ Vol. 11	807 KAR 5:001 Section 16(8)(f)	Summary of Membership Dues
50/ Vol. 11	807 KAR 5:001 Section 16(8)(g)	Payroll Costs
51/ Vol. 11	807 KAR 5:001 Section 16(8)(h)	Gross Revenue Conversion Factor
52/ Vol. 11	807 KAR 5:001 Section 16(8)(i)	Comparative Income Statements
53/ Vol. 11	807 KAR 5:001 Section 16(8)(j)	Cost of Capital Summary
54/ Vol. 11	807 KAR 5:001 Section 16(8)(k)	Financial Data and Earnings Measures
55/ Vol. 12	807 KAR 5:001 Section 16(8)(l)	Narrative Description of Tariff Changes
56/ Vol. 12	807 KAR 5:001 Section 16(8)(m)	Revenue Summaries
57/ Vol. 12	807 KAR 5:001 Section 16(8)(n)	Typical Bill Comparison
58	807 KAR 5:001 Section 16(9)	Deficiency Notification
59	807 KAR 5:001 Section 16(10)	Waiver Requests
60	807 KAR 5:001 Section 17(1)	Sample Notices Posted
61	807 KAR 5:001 Section 17(2)	Customer Notice Method
62	807 KAR 5:001 Section 17(3)	Proof of Notice
63	807 KAR 5:001 Section 17(4)	Customer Notice Content
Vol. 17 – 18	KRS 278.2203 and 278.2205	Cost Allocation Manual

22. Pursuant to KRS 278.192(1) and 807 KAR 5:001 Section 16(1)(a)(2), Duke Energy Kentucky has utilized a forward-looking test period for the twelve months ending December 31, 2022. This test period corresponds to the first twelve calendar month period the proposed rates will be in effect following the six-month suspension of the proposed rates.

23. The testimony and exhibits to this Application demonstrate that the rates, terms, conditions, and tariffs proposed are fair, just, and reasonable under KRS 278.030.

New Tariffs/Services/Mechanisms

24. Pursuant to the Commission's statutory rate-making authority to allow recovery of costs through fair, just, and reasonable rates embodied in KRS 278.180, KRS 278.183, KRS 278.192, and as confirmed by the Supreme Court of the Commonwealth of Kentucky in *Kentucky Public Service Comm'n v. Commonwealth ex rel. Conway*, 324 S.W.3d 373 (Ky. 2010), Duke Energy Kentucky is seeking to establish one new adjustment mechanism as part of this case related to recovery of costs and implementation of governmental mandates.

Governmental Mandate Adjustment Mechanism

25. Duke Energy Kentucky is proposing to implement Rider GMA as part of this proceeding. Rider GMA will enable the Company to implement and respond to governmental directives/mandates impacting the utility, including changes in federal or state tax rates and regulations promulgated by PHMSA. Duke Energy Kentucky's proposed Rider GMA mechanism will be applicable to all natural gas customers.

26. As this Commission is aware, in 2017, as part of the Tax Cuts and Jobs Act, the Trump Administration implemented a reduction in the federal corporate income tax rate from 35 percent to 21 percent. This prompted customers to initiate proceedings before this Commission so to implement these changes outside of a base rate proceeding.²

² *In the Matter of Kentucky Industrial Utility Customers, Inc., v. Duke Energy Kentucky, Inc.*, Case No. 2018-00036, (Order)(January 25, 2018); *See also*, (Order)(October 31, 2018): the Commission approved a non-unanimous settlement resolving the issues created by the Tax Cuts and Jobs Act and implementing rate adjustments, including creation of a new rider.

Likewise, the Kentucky General Assembly initiated its own reduction.³ Now, at the time of the filing of this Application, the new Biden Administration has indicated a desire to increase that federal tax rate.⁴ The impacts of such a change, once approved, are not certain at the time of preparation of this Application to include as part of the Company's base rates, but such a change could occur during the pendency of this case and be implemented after the resolution of this proceeding. Given the likelihood that such policy changes are becoming more routine, having a mechanism to respond as either a charge or a credit would be a benefit to all stakeholders and ensure the Company is collecting no more and no less than what it is required to collect in taxes. Rider GMA would function as such mechanism.

27. In recent years, PHMSA has become very active in its promulgation of new regulations and interpretation of existing regulations to further enhance and ensure the safety of the natural gas delivery systems throughout this country. Such policy determinations require the Company to take action to ensure compliance. Responding to these regulations require testing and, in many cases, upgrades and/or replacements of existing infrastructure to enable compliance with these new regulations. Rider GMA provides the ability to effectively respond to these new governmental policy changes that are intended to enhance and ensure the safety of the natural gas delivery system. This mechanism to enable recovery of costs for necessary pipeline replacements in response to PHMSA regulations is supported by and in accordance with KRS 278.509.

³ H.B. 487 became law on April 27, 2018 implementing a flat 5 percent income tax rate for individuals and corporations. Available at: <https://revenue.ky.gov/News/PublishingImages/Pages/DOR-Outreach-and-Education/2018%20KY%20Income%20Tax%20Changes-13NOV18.pdf>; Last accessed May 7, 2021.

⁴ See: <https://www.whitehouse.gov/briefing-room/speeches-remarks/2021/05/06/remarks-by-president-biden-on-the-american-jobs-plan-3/>; describing reducing the current tax cut to between 25 and 28 percent. Last accessed May 7, 2021

28. KRS 278.509 confirms the Commission’s authority to approve pipeline replacement programs upon application by a utility for recovery of such replacements that are not currently in base rates.⁵ Duke Energy Kentucky is aware of existing and forthcoming PHMSA rules, including its “Mega-Rule,” that will require the Company to replace aging infrastructure to meet new safety and integrity thresholds. Duke Energy Kentucky is not requesting approval of any such projects as part of this proceeding, merely the creation of the mechanism. Such pipeline replacement projects, which do not constitute an ordinary extension of the existing system in the course of business will occur with Commission authorization through a Certificate of Public Convenience and Necessity in accordance with KRS 278.020 and such investments will be placed into service outside of the test year in this proceeding. Therefore, this mechanism should alleviate the need for multiple successive rate cases to bring these new facilities into rates over the coming years and provide a streamlined and less volatile impact to customer rates as experienced by base rate proceedings. Any assets brought into service and included in the Rider GMA will be adjusted for taxes and depreciation until such time as the Company files a base rate proceeding to reset the mechanism.

29. Duke Energy Kentucky will file a separate application to implement any adjustments to the Rider GMA in response to a governmental mandate, which will be subject to Commission determination of reasonableness. Once approved, the Company will file annual adjustments to Rider GMA, for Commission approval, similar to what has been done with other adjustment mechanisms. The Company will maintain the burden of demonstrating that the governmental mandate is reasonable and prudent and that its costs/credits imposed are not currently reflected in base rates and should be recoverable.

⁵ KRS 278.509

The Company will use the rate of return approved in its most recent natural gas base rate case for purposes of calculating the return on rate base associated with these capital pipeline replacement projects necessitated by PHSMA.

30. Duke Energy Kentucky is proposing that its Rider GMA be made a permanent part of the Company's natural gas service and tariffs.

New and Modified Programs, Policies, and Tariffs

31. In connection with this application, the Company is proposing to implement, without limitation, certain new programs, policies, and tariffs, and to modify existing policies and tariffs as follows:

- a. Clarifying changes to the Company's Rate FRAS to specify the nomination deadline for suppliers scheduling natural gas deliveries.
- b. Correction language to the Company's Rate IMBS regarding the daily trade and nomination deadlines to make it consistent with Rates GTS and FRAS.
- c. Changes to Rate GTS to align the service with new system capabilities and to delete the two-business day deadline for daily trades to provide more flexibility to suppliers.
- d. Adding clarifying language to the Company's franchise fee tariff to make it consistent with the Company's electric franchise fee tariff.
- e. Approval of the Company's Revert-to-Owner Program, which replaces the Company's current Automatic Landlord Program. The Revert-to-Owner allows property owners/management companies

to better manage the utility service to their properties, including the ability to elect to automatically have utility service revert to their name when tenants move out.

- f. Changes to the description of for the Annual Plan for Budget Billing to reflect how the calculation will work when Customer Connect is implemented.
- g. Revised description of “satisfactory payment record” for determining whether a deposit may be required to reflect how this will be determined when Customer Connect is implemented.

WHEREFORE, Duke Energy Kentucky respectfully requests the Kentucky Public Service Commission to enter an Order:

- a. Approving the new and revised rates and tariff sheets for natural gas service;
- b. Authorizing Duke Energy Kentucky to establish its proposed Rider GMA;
- c. Authorizing Duke Energy Kentucky to establish a regulatory asset for rate case expenses of this instant case;
- d. Approving the proposed amortization of the rate case expense and any and all other requested or necessary deferrals;
- e. Approving Duke Energy Kentucky’s existing depreciation rates; and,
- f. Granting all other relief to which Duke Energy Kentucky may be entitled.

Respectfully submitted,

Duke Energy Kentucky, Inc.

/s/ Rocco O. D'Ascenzo

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CERTIFICATE OF SERVICE

This is to certify that the foregoing electronic filing is a true and accurate copy of the document being filed in paper medium; that the electronic filing was transmitted to the Commission on June 1, 2021; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; the original filing in paper medium will be delivered to the Commission pending further instruction from Case No. 2020-00085;⁶ and that a copy of the filing in paper medium is also being overnighted to the following:

John G. Horne, II
The Office of the Attorney General
Utility Intervention and Rate Division
700 Capital Avenue, Ste 118
Frankfort, Kentucky 40601

/s/ Rocco O. D'Ascenzo
Rocco O. D'Ascenzo

⁶ *In the Matter of Electronic Emergency Docket Related to the Novel Coronavirus COVID-19*, Order, Case No. 2020-00085 (Ky. P.S.C. March 16, 2020).