

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) CASE NO. 2021-00190
RATES; 2) APPROVAL OF NEW TARIFFS;)
3) ALL OTHER REQUIRED APPROVALS)
AND RELIEF)**

**DIRECT TESTIMONY
AND EXHIBITS
OF
LANE KOLLEN**

**ON BEHALF OF THE
KENTUCKY OFFICE OF THE ATTORNEY GENERAL**

**J. KENNEDY AND ASSOCIATES, INC.
ROSWELL, GEORGIA**

SEPTEMBER 2021

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TABLE OF CONTENTS

I. QUALIFICATIONS AND SUMMARY 1

II. RATE BASE ISSUES 5

 A. Cash Working Capital..... 5

 B. Other Working Capital Allowances – Construction Accounts Payable 7

III. OPERATING INCOME ISSUES..... 9

 A. Increase Commercial Gas Transportation Revenues..... 9

 B. Normalize Non-Developmental Customer Connect And Retired CMS
 O&M Expense and Defer and Amortize Developmental Customer
 Connect and Retired CMS O&M Expense..... 12

 C. Exclude Payroll Tax Expense On Incentive Compensation Payroll
 Expense 16

 D. Exclude Short Term Incentive Plan Expense Tied To Earnings Per
 Share “Circuit Breaker” Threshold..... 18

 E. Reduce 401(k) Matching Costs for Employees Who Also Participate in
 Defined Benefit Plan 19

 F. Exclude Supplemental Executive Retirement Plan Expense 21

 G. Remove American Gas Association (“AGA”) and Interstate Natural Gas
 Association of America (“INGAA”) Dues..... 22

 H. Correct Cost Of Capital 24

 I. Utilize Consistent Service Life for All Depreciation Expense on Customer
 Connect Plant In Service 28

IV. RATE OF RETURN ISSUES 30

 A. Increase Short-Term Debt In Capital Structure To Reflect Historic
 Use of Short-Term Debt Financing 30

 B. Reduce Cost of Long-Term Debt To Reflect Company’s Updated Forecast
 of Lower Interest Rates For Issuances After Base Period And In Test Year .36

 C. Reduce Cost of Long-Term Debt For Issuance In Test Year 37

 D. Reduce Return on Equity to 9.1%..... 37

V. GOVERNMENT MANDATE ADJUSTMENT RIDER..... 38

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DIRECT TESTIMONY OF LANE KOLLEN

I. QUALIFICATIONS AND SUMMARY

1
2

3 **Q. Please state your name and business address.**

4 A. My name is Lane Kollen. My business address is J. Kennedy and Associates, Inc.
5 ("Kennedy and Associates"), 570 Colonial Park Drive, Suite 305, Roswell, Georgia
6 30075.

7

8 **Q. What is your occupation and by whom are you employed?**

9 A. I am a utility rate and planning consultant holding the position of Vice President and
10 Principal with the firm of Kennedy and Associates.

11

12 **Q. Describe your education and professional experience.**

13 A. I earned a Bachelor of Business Administration ("BBA") degree in accounting and a
14 Master of Business Administration ("MBA") degree from the University of Toledo. I

1 also earned a Master of Arts (“MA”) degree in theology from Luther Rice University.
2 I am a Certified Public Accountant (“CPA”), with a practice license, Certified
3 Management Accountant (“CMA”), and Chartered Global Management Accountant
4 (“CGMA”). I am a member of numerous professional organizations, including the
5 American Institute of CPAs and the Society of Depreciation Professionals, among
6 others.

7 I have been an active participant in the utility industry for more than forty
8 years, initially as an employee of The Toledo Edison Company from 1976 to 1983 and
9 thereafter as a consultant to government agencies and utility customers. I have
10 testified as an expert witness on ratemaking, accounting, financing, taxation, mergers
11 and acquisitions, and planning issues in proceedings before regulatory commissions
12 and courts at the federal and state levels on hundreds of occasions.

13 I have testified before the Kentucky Public Service Commission on dozens of
14 occasions, including base rate, environmental surcharge, fuel adjustment clause,
15 resource acquisition, resource retirement, and merger and acquisition proceedings
16 involving Duke Energy Kentucky, Inc. (“Duke Energy” or “Company”), Kentucky
17 Power Company (“KPC”), Kentucky Utilities Company (“KU”), Louisville Gas and
18 Electric Company (“LG&E”), East Kentucky Power Cooperative, Inc. (“EKPC”), Big
19 Rivers Electric Corporation (“BREC”), Atmos Energy Corporation (“Atmos”), and
20 Columbia Gas of Kentucky, Inc.¹

¹ My qualifications and regulatory appearances are further detailed in my Exhibit ___(LK-1).

1 **Q. On whose behalf are you testifying?**

2 A. I am testifying on behalf of the Office of the Attorney General of the Commonwealth
3 of Kentucky (“AG”).

4

5 **Q. What is the purpose of your testimony?**

6 A. The purpose of my testimony is to address and make recommendations on numerous
7 rate base, revenue, expense, and rate of return issues that affect the Company’s claimed
8 revenue requirement and requested rate increase and to quantify the effects of AG
9 witness Mr. Richard Baudino’s recommendations on the Company’s claimed revenue
10 requirement and requested rate increase.

11

12 **Q. Please summarize your testimony.**

13 A. I recommend that the Commission increase the Company’s base rates by no more than
14 \$6.348 million compared to the Company’s requested base rate increase of \$15.228
15 million. I summarize my recommendations and the effects on the Company’s
16 requested base rate increase in the following table. I also reflect the effects of Mr.
17 Baudino’s cost of capital recommendations on the Company’s requested increase in
18 base rates on the following table.² I developed my adjustments in consultation with
19 the AG, but I understand that the AG’s final adjustments may differ based upon
20 discovery, testimony and further evidence produced at the hearing.

21

² My electronic workpapers in live format, and with all formulas intact, have been filed along with my testimony.

1

Duke Energy Kentucky, Inc. Gas Division Summary of Attorney General Recommendations KPSC Case No. 2021-00190 Test Year Ended December 31, 2022 \$ Millions			
	Before Gross-Up Amount	B/D and PSC Gross-up	Adjustment Amount
Duke Energy Kentucky, Inc. - Gas Division Requested Base Rate Increase			\$ 15.228
Effects on Increase of AG Rate Base Recommendations			
Reduce Working Capital for Construction Accounts Payable			(0.442)
Reflect Rate Base Effects of Deferring and Amortizing CIS Developmental Costs			0.057
Reflect Rate Base Effects of Changing Customer Connect Depreciation Rates			0.002
Effects on Increase of AG Operating Income Recommendations			
Increase Commercial Gas Transportation Revenue	(0.245)	1.002	(0.245)
Defer and Amortize CIS Developmental Costs To Be Incurred in Test Year	(1.737)	1.002	(1.740)
Remove Payroll Taxes Related to Company's Incentive Compensation Adjustment	(0.045)	1.002	(0.045)
Exclude Short Term Incentive Plan Expense Tied to "Circuit Breaker" EPS	(0.358)	1.002	(0.359)
Reduce 401K Matching Costs for Employees Who Also Participate in Defined Benefit Plan	(0.220)	1.002	(0.221)
Remove SERP Costs	(0.034)	1.002	(0.034)
Remove AGA and INGAA Dues	(0.055)	1.002	(0.055)
Reduce Excessive Cost of Capital Included in DEBS Expenses	(0.311)	1.002	(0.312)
Modify Depreciation Expense for Customer Connect Plant in Service	(0.061)	1.002	(0.061)
Effects on Increase of AG Rate of Return Recommendations			
Increase Level of Money Pool Short Term Debt			(1.783)
Reflect Company's Update to Interest Rates for Projected Issuances			(0.079)
Adjust Interest Rate for Projected September 2022 Issuance Using Company's Methodology			(0.009)
Reflect Reduction of Return on Equity from 10.30% to 9.10%			(3.555)
Total AG Recommendations			<u>\$ (8.881)</u>
Maximum Base Rate Increase after AG Recommendations			<u>\$ 6.348</u>

2

3

4 **Q. Do you have any comments with respect to the Company's assumptions and**
5 **calculations reflected in the forecast test year before you address the specific**
6 **issues listed on the preceding table?**

7 **A. Yes.** I recommend that the Commission exercise a healthy skepticism and critically
8 review the reasonableness of the assumptions made and the methodologies employed
9 by the Company to project and calculate rate base components, revenues, expenses,
10 and cost of capital in the forecast test year. These assumptions and methodologies
11 result in forecast amounts that cannot be verified against actual accounting records.

1 capital study calculated using the lead/lag approach, the Commission set the cash
2 working capital to \$0.

3
4 **Q. Is simply setting the cash working capital to \$0 an acceptable approach going**
5 **forward?**

6 A. No. It certainly is better than the outdated and excessive result using the one-eighth
7 non-gas O&M expense formula approach. However, a properly performed cash
8 working capital study using the lead/lag approach would provide a more accurate
9 analysis and result than simply setting the cash working capital to \$0.

10 The result of a properly performed cash working capital study using the
11 lead/lag approach most likely would be negative. This is due to the fact that the
12 Company sells its receivables, which results in a very short revenue lag, generally less
13 than two days. The expense lags on the cash expenses generally are much longer than
14 two days.

15

16 **Q. What is your recommendation?**

17 A. I recommend that the Commission direct the Company to provide a cash working
18 capital calculation using the lead/lag approach in its next base rate case filing so that
19 the Commission at least has the evidence to consider those results in the base revenue
20 requirement in that proceeding.

21

22 **Q. Is there any effect of your recommendation on the base revenue requirement and**
23 **base rate increase in this proceeding?**

1 A. No.

2

3 **B. Other Working Capital Allowances – Construction Accounts Payable**

4

5 **Q. Describe the components of the Company's other working capital allowances.**

6 A. The Company included gas enricher liquids, gas stored underground, materials and
7 supplies inventories, and prepayments in the other working capital allowances
8 component of rate base. These are balance sheet asset amounts that it finances and it
9 is appropriate to include them in rate base.

10

11 **Q. Did the Company subtract any balance sheet liability amounts from the other**
12 **working capital allowances component of rate base?**

13 A. No.

14

15 **Q. Is there one balance sheet liability amount in particular that the Company failed**
16 **to subtract from rate base?**

17 A. Yes. The Company failed to subtract any accounts payable liability balance sheet
18 amounts from rate base. This is a balance sheet amount that allows the Company to
19 avoid financing and it is appropriate to subtract it from rate base either through the
20 cash working capital calculation using the lead/lag approach or through a separate
21 adjustment or a combination. The accounts payable amounts represent temporary
22 vendor financing at 0% cost to the Company for both operating expenses and capital
23 expenditures. The Company issues no equity, long term debt, or short-term debt to

1 finance the delay in paying the expenses or capital expenditures after the costs are
2 incurred.

3 The accounts payable amounts related to operating expenses typically are
4 reflected in the expense lead or lag days used in the calculation of cash working capital
5 under the lead/lag approach. In lieu of a properly performed cash working capital
6 study, there is no direct measurement of accounts payable amounts related to operating
7 expenses and no evidence that it is or is not subtracted from rate base in this
8 proceeding.

9 That is not the case with the accounts payable amounts related to capital
10 expenditures. In a cash working capital study using the lead/lag approach, only the
11 lead/lags on expenses are included; the study does not include balance sheet assets and
12 liabilities. Instead, the accounts payable amounts related to capital expenditures must
13 be considered separately and subtracted directly from rate base in the same manner
14 that the materials and supplies and prepayments are considered separately and added
15 directly to rate base as components of the other working capital allowances.

16
17 **Q. What is your recommendation?**

18 A. I recommend that the Commission reduce the Company's other working capital
19 allowances for the accounts payable amounts related to capital expenditures. This is
20 cost-free financing provided by the Company's vendors and should be subtracted from
21 rate base in the same manner that materials and supplies and prepayments that will be
22 charged to capital expenditures are added to rate base.

23

1 **Q. What is the effect of your recommendation?**

2 A. The effect is a reduction in the claimed revenue requirement deficiency and requested
3 base increase of \$0.442 million.

4

5 **III. OPERATING INCOME ISSUES**

6

7 **A. Increase Commercial Gas Transportation Revenues**

8

9 **Q. Compare the commercial gas transportation revenues in the test year to the base**
10 **period and prior years.**

11 A. The Company included forecast commercial gas transportation revenues of \$1.379
12 million in the test year compared to \$1.498 million in the base period, a decrease of
13 8%.

14 The Company's commercial gas transportation revenues were \$1.179 million
15 in 2018, \$1.235 million in 2019, and \$1.328 million in 2020, showing consistent
16 growth each year, even in 2020, the year of the Covid-19 pandemic shutdowns and
17 reduced economic activity.⁴ Since 2018, the average annual growth rate has been
18 6.3%. The growth in 2021 and the test year likely will be greater due to the post-
19 pandemic economic rebound and increase in hiring.

20 After the forecast decline in the test year, the Company forecasts that the
21 commercial gas transportation revenues will grow again, increasing to \$1.573 million
22 in 2023 and \$1.611 million in 2024.⁵

⁴ Schedule I-2.1.

⁵ *Id.*

1

2 **Q. Compare the Company’s forecast decline in the commercial gas transportation**
3 **revenues to the forecast increases in the industrial and Other Public Authorities**
4 **(“OPA”) gas transportation revenues in the test year compared to the base**
5 **period.**

6 A. In stark contrast to the Company’s forecast decline in commercial gas transportation
7 revenues, the Company forecasts robust growth in industrial and OPA gas
8 transportation revenues in the test year compared to the base period. More
9 specifically, the Company forecasts industrial gas transportation revenues of \$3.496
10 million in the test year compared to \$2.988 million in the base period, an increase of
11 17%. The Company forecasts OPA gas transportation revenues of \$0.412 million in
12 the test year compared to \$0.261 million in the base period, an increase of 58%.

13

14 **Q. What is the Company’s explanation for the reduction in the commercial gas**
15 **transportation revenues in the test year compared to the base year?**

16 A. The Company acknowledges that there has been a “recent surge in sales,” but claims
17 “[a]s the economy re-approaches its pre-pandemic output level, that hiring will slow,
18 implying a slowdown in sales projected by the model.”⁶

19

20 **Q. Does that explanation justify a decrease in commercial gas transportation**
21 **revenues in the test year compared to the base period?**

⁶ Response to AG 2-20. I have attached a copy of this response as my Exhibit____(LK-2).

1 A. No. This explanation does not justify a decrease in these revenues. First, there is no
2 evidence that the number of jobs will decline or that commercial transportation
3 customers will transport and use lower natural gas volumes. Even if there is a
4 slowdown in hiring and economic growth in the test year compared to the base period,
5 that still will translate into growth in revenues, not a decrease. Second, the actual
6 evidence is that hiring is strong and the economy continues to rebound sharply. That
7 means that commercial gas transportation revenues should increase, not decrease.
8 Third, there actually was an increase in commercial gas transportation revenues during
9 2020, despite the fact that there was widespread unemployment and the economy was
10 shutdown for a significant portion of the year. It is unreasonable to assume that rising
11 employment and economic recovery will have the opposite outcome. Fourth, the
12 Company's forecast decline in commercial gas transportation revenues is completely
13 at odds with the forecast increases in industrial and OPA gas transportation revenues.

14

15 **Q. What is your recommendation?**

16 A. I recommend that the Commission reflect \$1.624 million in commercial gas
17 transportation revenues in the test year. I started with the base period revenue of
18 \$1.498 million and then escalated it by the historic annual growth of 6.3% for the 16
19 months from the end of the base period to the end of the test year, for an increase of
20 \$0.126 million in the test year compared to the base period.

21

22 **Q. What is the effect of your recommendation?**

23 A. The effect is an increase in forecast commercial gas transportation revenues of \$0.245

1 million in the test year and a reduction in the base rate increase of an equivalent
2 amount. This is the difference in the \$1.624 million in commercial gas transportation
3 revenues that I recommend and the \$1.379 million the Company included in the test
4 year.

5
6 **B. Normalize Non-Developmental Customer Connect And Retired CMS O&M**
7 **Expense; Defer and Amortize Developmental Customer Connect and Retired**
8 **CMS O&M Expense**
9

10 **Q. Describe the Company's request to include nonrecurring developmental**
11 **Customer Connect O&M expense in the base revenue requirement.**

12 A. The Company seeks to include \$1.902 million in nonrecurring developmental
13 Customer Connect O&M expense and another \$0.085 in recurring non-developmental
14 expense, or a total of \$1.987 million in the test year.⁷

15
16 **Q. How does the Company's Customer Connect forecast test year developmental**
17 **expense compare to the historic actual developmental expense since 2018?**

18 A. The Company's forecast test year developmental expense is significantly greater than
19 the expenses it actually incurred each year from 2018 through 2020 and the expense
20 that it expects to incur in 2021. The Company actually incurred \$0.544 million in
21 2018, \$0.580 million in 2019, \$0.545 million in 2020, and expects to incur \$0.953
22 million in 2021.

⁷ Response to AG 2-5. I have attached a copy of this response and the attachments as my Exhibit___(LK-3).

1

2 **Q. How does the Company's Customer Connect forecast test year developmental**
3 **expense compare to the forecast developmental expense for 2023?**

4 A. The Company's forecast test year developmental expense is significantly greater than
5 the forecast expense for 2023. It forecasts that it will incur \$0.145 million in
6 developmental expense in 2023, a reduction of \$1.757 million compared to the test
7 year.⁸

8

9 **Q. How does the Company's forecast test year recurring non-developmental expense**
10 **compare to the forecast for 2023?**

11 A. It is less in the test year than it forecasts it will incur in 2023. It forecasts that it will
12 incur \$0.335 million in non-developmental expense in 2023, an increase of \$0.250
13 million.⁹

14

15 **Q. Will the Company continue to incur expenses for the old CMS after it is retired?**

16 A. No. The Company actually incurred \$0.359 million in 2018, \$0.313 million in 2019,
17 \$0.304 million in 2020, expects to incur \$0.255 million in 2021, \$0.209 million in
18 2022, and then \$0.042 million in 2023.¹⁰

19

20 **Q. Is the test year level of developmental expense recurring?**

⁸ *Id.*

⁹ *Id.*

¹⁰ *Id.*

1 A. No. The developmental expense is not recurring. This fact is not disputed. It will
2 decline from \$1.902 million in the test year to \$0.145 million in 2023. The Company's
3 development of the Customer Connect modules will be completed in the first half of
4 the test year.¹¹ These developmental costs are more akin to capital expenditures
5 because they have future value to customers. The Company agrees that it is reasonable
6 to defer these developmental expenses and to amortize and recover the regulatory asset
7 over the service life of the Customer Connect asset. In Case No. 2019-00271,
8 Company witness Sarah Lawler stated the following:

9 [T]he Company is willing to accept Mr. Kollen's recommendation only if
10 regulatory asset authority is granted by the Commission to allow the Company to
11 accumulate all actual O&M expenses, including carrying costs, associated with
12 the Customer Connect program incurred (beginning with those incurred during the
13 test period in this case) into a regulatory asset. Once the total actual costs for the
14 project are incurred and the actual amount of the regulatory asset is known, the
15 Company will request recovery in a subsequent rate proceeding. The Company
16 also agrees with Mr. Kollen's recommendation to include this regulatory asset in
17 rate base in that subsequent rate proceeding with an amortization period equal to
18 the service life used for the depreciation rate applied to the capital costs.¹²
19

20 **Q. Why is the issue of whether the test year level of expense is recurring important?**

21 A. It is important because it affects the base rates and the recoveries of the expenses until
22 base rates are reset in a future proceeding. If the expense is included in the base
23 revenue requirement, then there will be a significant mismatch between the revenue
24 recovered and the expense incurred. The Company will continue to recover the
25 nonrecurring expense in its base revenues even as the expense recedes and disappears.
26 In fact, if it is included in the base revenue requirement as a recurring expense, then

¹¹ Response to AG 2-6, including the development timeline reflected in the Attachment to the response. I have attached a copy of the response as my Exhibit___(LK-4).

¹² Rebuttal Testimony of Sarah Lawler at 24 in Case No. 2019-00271.

1 the Company likely will recover the nonrecurring expense multiple times, clearly an
2 inequitable and incorrect result. If the Commission allows the \$1.902 million
3 nonrecurring expense and the \$0.085 million in recurring expense in the base revenue
4 requirement, the sum of the nonrecurring and recurring expense is \$0.481 in 2023, and
5 this total expense repeats in subsequent years, then the Company will recover \$1.506
6 million in excess of its actual expense each year until its base rates are reset. Over
7 three years, the excess recovery will be \$4.518 million. Over four years, the excess
8 recovery will be \$6.024 million.

9 The excess recovery of the nonrecurring developmental expenses is
10 exacerbated by the fact that the old CMS expenses also are nonrecurring, except for a
11 small amount forecast in 2023. The Company will recover another \$0.166 million in
12 excess of its actual expense each year for the old CMS until its base rates are reset.
13 Over three years, the excess recovery will be another \$0.498. Over four years, it will
14 be \$0.664 million.

15
16 **Q. Is there a fair and equitable way to address the recovery of these two**
17 **nonrecurring expenses?**

18 A. Yes. I recommend that the Commission determine the normalized level of recurring
19 expense and allow recovery of this amount in the base revenue requirement. In
20 addition, I recommend that it direct the Company to defer the nonrecurring
21 developmental expense of Customer Connect and the nonrecurring expense of the old
22 CMS and amortize the two deferred expenses over the service life of Customer
23 Connect. I also recommend that the deferred expenses be included in rate base in this

1 proceeding because they are akin to capital expenditures with future value.

2 This approach provides a fair and equitable result. In this manner, the
3 Company is fully compensated for its developmental expenses in the base revenue
4 requirement, but does not obtain excessive recovery, which could be as much as three
5 or four times the actual expenses that it incurs if there is no deferral.

6
7 **Q. What is the effect of your recommendation?**

8 A. The effect is a reduction of \$1.683 million in the base revenue requirement and the
9 base rate increase. This effect consists of reductions in grossed-up expense of \$1.545
10 million and \$0.195 million to remove the nonrecurring developmental Customer
11 Connect expenses and the old CMS, respectively, net of an increase in expense to
12 reflect the recurring non-developmental Customer Connect expenses, and the deferral
13 of the nonrecurring expenses to a regulatory asset, an amortization of the regulatory
14 asset based on a 15 year service life, and an increase of \$0.057 million for the return
15 on the regulatory asset, net of accumulated amortization and ADIT.

16
17 **C. Exclude Payroll Tax Expense On Incentive Compensation Payroll Expense**
18

19 **Q. Describe generally the Company's adjustments to remove incentive**
20 **compensation payroll expense tied to the achievement of financial targets.**

21 A. The Company removed incentive compensation payroll expense tied to the
22 achievement of financial targets for the short-term incentive plan, long-term incentive
23 plan, and the restricted stock units.

1

2 **Q. Do the Company's proposed adjustments remove all incentive compensation**
3 **expenses tied to the achievement of financial targets?**

4 A. No. The Company failed to remove the payroll tax expense on the incentive
5 compensation payroll expense. These payroll tax expenses would not have been
6 incurred but for the payroll expense tied to the achievement of financial targets.

7

8 **Q. Does the Company agree that the payroll tax expense on the incentive**
9 **compensation expense also should be removed?**

10 A. Yes. The Company agreed that the payroll expense on the incentive compensation
11 expense also should be removed in Case No. 2019-00271.¹³

12

13 **Q. Did the Commission also agree that the payroll tax expense on the incentive**
14 **compensation expense should be removed in Case No. 2019-00271?**

15 A. Yes. In its Order in the case, it stated: "The Commission agrees with the adjustment
16 to payroll taxes associated with incentive compensation."¹⁴

17

18 **Q. What is your recommendation?**

19 A. I recommend that the Commission remove the payroll tax expense related to the
20 adjustments to remove incentive compensation expense tied to financial performance
21 from the base revenue requirement and requested base rate increase.

¹³ Rebuttal Testimony of Sarah Lawler at 23 in Case No 2019-00271.

¹⁴ Order in Case No. 2019-00271 at 19.

1

2 **Q. What is the effect of your recommendation?**

3 A. The effect is a \$0.045 million reduction in other taxes expense and in the base revenue
4 requirement and requested base rate increase.

5

6 **D. Exclude Short Term Incentive Plan Expense Tied To Earnings Per Share**
7 **“Circuit Breaker” Threshold**

8

9 **Q. Describe the Earnings Per Share (“EPS”) funding threshold for the Company’s**
10 **short term incentive plan.**

11 A. The Company’s funding for the short-term incentive plan (“STI”) is contingent on the
12 achievement of an EPS “circuit breaker” threshold. The Company provided the
13 following description:

14 [T]he EPS measure has a "circuit breaker" level that is set between the minimum and
15 target EPS performance levels and may reduce any incentive during periods when the
16 Companies cannot afford it. If actual EPS is greater than the EPS circuit breaker, all
17 measures will be paid out based on the scorecard. If actual EPS is less than or equal
18 to the EPS circuit breaker, payouts for all measures will be reduced.¹⁵
19

20 **Q. Did the Commission deny recovery of the STI expense contingent on the EPS**
21 **“circuit breaker” in Case No. 2019-00271?**

22 A. Yes. In that case, the Commission denied recovery of STI expense that would be paid out
23 only in the event that a predetermined "circuit breaker" EPS value was met in the fiscal
24 year.¹⁶

¹⁵ Direct Testimony of Jake Stewart at 17-18.

¹⁶ Direct Testimony of Jake Stewart at 27.

1

2 **Q. What is your recommendation?**

3 A. I recommend that the Commission deny recovery of the STI expense subject to the
4 “circuit breaker” EPS threshold. Pursuant to this EPS threshold, all other target
5 metrics are subject to the parent Company’s EPS, which is functionally equivalent to
6 an EPS metric overlay imposed on all other metrics. In addition, the EPS is calculated
7 at the parent company level, not at the Company level, which means that the EPS is
8 affected by the financial performance of all Duke Energy, Inc. utilities and other
9 affiliates, not only by the Company’s financial performance. Further, including the
10 STI expense in the base revenue requirement provides the Company recovery of the
11 expense regardless of whether it actually is incurred and regardless of the amount that
12 it incurs. Finally, including the expense in the base revenue requirement provides the
13 Company an incentive to seek greater and more frequent rate increases or other forms
14 of recovery to ensure that it achieves the “circuit breaker” EPS threshold.

15

16 **Q. What is the effect of your recommendation?**

17 A. The effect is a reduction in STI expense and the related payroll taxes expense of \$0.358
18 million, consisting of a reduction in payroll expense of \$0.333 million and a reduction
19 in payroll taxes expense of \$0.025 million.

20

21 **E. Reduce 401(k) Matching Costs for Employees Who Also Participate in Defined**
22 **Benefit Plan**

1

2 **Q. Did the Company reduce employee benefits expense to remove the 401(k) match**
3 **expense for those employees who also participate in the defined benefit pension**
4 **plan?**

5 A. No. The Commission's recent precedent is to adjust benefits expense to remove the
6 401(k) match expense for those employees who also participate in a defined benefit
7 pension plan. In lieu of an adjustment to remove a portion of the 401(k) match expense
8 in Case No. 2019-00271, the Company made an adjustment to remove the pension
9 expense for the employees who also receive a 401(k) match. The Commission noted
10 and implicitly accepted the adjustment in its Order in the case, but neither affirmed
11 nor denied the adjustment in its narrative discussion.

12 However, in this proceeding, the Company made no adjustment either to the
13 401(k) matching expense or pension expense. The Company stated in discovery that
14 if it made an adjustment to remove the pension expense for the employees who also
15 receive a 401(k) match, the adjustment would be to remove a negative pension expense
16 and increase the base revenue requirement and requested increase.¹⁷ Although that
17 may be correct, the Company's claim addresses a potential adjustment that the
18 Commission has not affirmed, but merely accepted, rather than the adjustment that it
19 historically has adopted.

20

21 **Q. Has the Company quantified the amount of the adjustment necessary to remove**

¹⁷Response to AG 2-17. I have attached a copy of this response as my Exhibit____(LK-5).

1 **the 401(k) match expense for employees who also participate in the defined**
2 **benefit plan, the adjustment historically adopted by the Commission?**

3 A. Yes. The Company quantified the reduction in expense as \$0.220 million.¹⁸

4
5 **Q. What is your recommendation?**

6 A. I recommend that the Company remove the 401(k) match expense for those employees
7 who also participate in the defined benefit plan consistent with the Commission's
8 recent precedent.

9
10 **F. Exclude Supplemental Executive Retirement Plan Expense**
11

12 **Q. Did the Company include Supplemental Executive Retirement Plan ("SERP")**
13 **expense in its requested increase in base rates?**

14 A. Yes.¹⁹ The Company included \$0.034 million in its claimed revenue requirement and
15 requested increase in base rates.²⁰

16
17 **Q. Did the Commission previously deny recovery of SERP expense in Case No. 2019-**
18 **00271?**

19 A. Yes. In its Order in that proceeding, the Commission stated:

20 Kollen recommends that, in addition to the pro forma adjustment already made
21 by Duke Kentucky, the Commission exclude expenses associated with Duke
22 Kentucky's Supplemental Executive Retirement Plan (SERP) of \$0.122
23 million. Kollen recommends this on the grounds that the expenses are incurred

¹⁸ Response to AG 1-41. I have attached a copy of this response as my Exhibit__(LK-6).

¹⁹ Response to AG 2-18. I have attached a copy of the response as my Exhibit__(LK-7).

²⁰ Response to AG 1-60. I have attached a copy of this response as my Exhibit__(LK-8).

1 to provide certain highly compensated executives retirement benefits in
2 addition to the benefits otherwise available through the Duke Energy pension
3 and other postretirement benefits plans. The Attorney General recommends
4 that the Commission accept this adjustment. Duke Kentucky states that it
5 accepts the adjustment to remove the SERP expense.
6

7 The Commission finds that this adjustment should be accepted and Duke
8 Kentucky's revenue requirement reduced by \$0.122 million. (footnotes
9 omitted).
10

11 **Q. What is your recommendation?**

12 A. I recommend that the Commission deny recovery of SERP expense in this proceeding,
13 consistent with its Order in Case No. 2019-00271.
14

15 **G. Remove American Gas Association (“AGA”) and Interstate Natural Gas**
16 **Association of America (“INGAA”) Dues**
17

18 **Q. Describe the Company's request for recovery of AGA and INGAA dues.**

19 A. The Company included \$0.050 million for AGA and \$0.005 million for INGAA dues
20 in the test year.
21

22 **Q. Describe generally the public-facing activities of AGA and INGAA.**

23 A. The Company described these activities in response to AG discovery:

24 **The AGA works with elected political leaders on key issues that could have**
25 **an impact on its member companies, the energy utility sector and gas**
26 **customers. INGAA is a trade organization that advocates regulatory and**
27 **legislative positions of importance to the natural gas pipeline industry in**
28 **North America.**²¹
29

²¹ Response to AG 2-02(d). I have attached a copy of that response as my Exhibit____(LK-9).

1 **Q. Describe the Commission’s precedent regarding recovery of Edison Electric**
2 **Institute (“EEI”) dues.**

3 A. The AGA and INGAA dues are similar to EEI dues. In various cases, the Commission
4 disallowed EEI dues in part or whole because EEI engages in 1) legislative advocacy,
5 2) regulatory advocacy, and 3) public relations. In prior Orders, the Commission
6 disallowed EEI dues in part based on operating expense categories.²² In more recent
7 Orders, the Commission disallowed EEI dues in whole.²³ In the recent Orders, the
8 Commission stated that the utilities had not met their affirmative burden of proof to
9 show that the EEI dues expense were fair, just, and reasonable.

10

11 **Q. Has the Company provided proof that the dues its ratepayers provide toward the**
12 **Company’s membership in both AGA and INGAA provide a direct benefit to**
13 **ratepayers?**

14 A. No.

15

16 **Q. Has the Company provided proof that the dues its ratepayers provide toward the**
17 **Company’s membership in both AGA and INGAA are not used for legislative**
18 **advocacy, regulatory advocacy, and/or public relations?**

19 A. No.

20

²² Order in Case No. 2003-00433 at 51-52 and Order in Case No. 2003-00434 at 44-45.

²³ Order in Case No. 2020-00349 at 25-28 and Order in Case No. 2020-00350 at 27-31 (“Regulatory advocacy and public relations, in addition to legislative advocacy, are categories of costs incurred by EEI and passed onto KU for which the Commission has explicitly denied recovery from customers.” Case No. 2020-00349, Order at 26).

1 **Q. What is your recommendation?**

2 A. I recommend that the costs for AGA and INGAA dues in the test year be removed in
3 accordance with Commission precedent unless the Company can provide the requisite
4 affirmative proof. The Company has thus failed to establish that this expense is fair,
5 just, and reasonable. The Company has provided no evidence of a direct ratepayer
6 benefit from its memberships in these two trade organizations, and no evidence that
7 ratepayer-provided dues are not used for legislative advocacy, regulatory advocacy,
8 and/or public relations.

9

10 **H. Correct DEBS Affiliate Cost Of Capital**

11

12 **Q. Describe the DEBS affiliate “rent” expense included by the Company in its base**
13 **revenue requirement.**

14 A. DEBS is an affiliate service company that provides certain centralized and shared
15 services to all Duke Energy utilities, including the Company. In addition to other
16 DEBS affiliate expenses, the Company included \$0.327 million in “rent” expense for
17 an *imputed return on DEBS’* so-called “rate base” costs. The Company used this
18 imputed return instead of the interest expense incurred by DEBS on the short-term
19 debt that DEBS actually uses to finance these rate base costs.²⁴

20

21 **Q. How did the Company calculate this imputed return?**

²⁴Response to AG 1-68. I have attached a copy of that response as my Exhibit____(LK-10).

1 A. The Company calculated the *imputed return* using its cost of capital, including a gross-
2 up for income taxes. The Company calculated the “rate base” costs using the DEBS
3 plant in service (less accumulated depreciation and ADIT), pension asset, and
4 inventories. It then allocated each of these amounts to the Company and its gas
5 business and applied the Company’s present authorized grossed up rate of return.

6

7 **Q. Does the Company itself finance the DEBS “rate base” costs?**

8 A. No. The Company itself does not finance and does not incur any financing costs for
9 the assets net of liabilities owned by DEBS. Rather, DEBS finances its own “rate
10 base” costs. DEBS uses short-term debt, ADIT, accounts payable vendor financing,
11 and other liabilities to finance these costs.

12

13 **Q. Does the DEBS affiliate “rent” expense reflect an actual financing cost incurred
14 by DEBS that it just allocates and passes through to the Company?**

15 A. No. DEBS has minimal common equity and no long-term debt. Its financing, other
16 than the vendor financing and other liabilities, is limited to short term debt and the cost
17 of this financing is limited to the interest expense. The DEBS short-term debt
18 financing consists of borrowings from the Duke Energy Money Pool, an intercompany
19 financing arrangement that allows DEBS and the Duke Energy utilities to borrow
20 through the issuance of commercial paper and/or from each other. Pursuant to the
21 terms of the Money Pool Agreement, DEBS is able to access excess funds on deposit
22 in the Money Pool from other Duke affiliates and low-cost commercial paper
23 borrowings available through the Money Pool.

1

2 **Q. Does it make a difference if the assets and related costs are incurred and financed**
3 **by DEBS or if they are incurred and financed directly by the Company?**

4 A. Yes. It does matter which entity owns assets and incurs and finances the costs of those
5 assets. The Company's cost of capital is significantly greater than the DEBS cost of
6 capital. The Company's base revenue requirement should not be increased based on
7 charges for imputed costs that DEBS does not *actually* incur under the pretense that
8 the DEBS and Company costs of capital are equivalent when they factually are not.

9

10 **Q. What is your recommendation?**

11 A. I recommend that the Commission reject the Company's request for recovery of an
12 imputed return on the DEBS so-called "rate base" assets that DEBS itself does not
13 incur. Instead, I recommend that the Commission allow recovery of an allocation of
14 the DEBS short-term interest expense, which DEBS does incur.

15

16 **Q. What is the effect of your recommendation?**

17 A. The effect is a \$0.311 million reduction in the DEBS affiliate expense for its cost of
18 capital, consisting of the elimination of \$0.327 million in "rent" expense for the
19 imputed return on a proxy rate base that DEBS does not incur, and the addition of
20 \$0.016 million for an allocation of the DEBS short term interest expense that DEBS
21 does incur.

22

1 **Q. If the Commission accepts the Company’s calculation of an imputed return using**
2 **its requested grossed up cost of capital, then should it correct the Company’s**
3 **calculation to remove the DEBS pension asset included in the DEBS “rate base”**
4 **in this calculation?**

5 A. Yes. The Company did not include a pension asset in its rate base and agrees as a
6 conceptual matter that a pension asset should not be included in rate base.²⁵ Yet, it
7 included an imputed return on the DEBS pension asset in its calculation of the DEBS
8 “rent” expense. The Company’s position should be consistently applied, regardless of
9 whether it is applied to the costs on its accounting books or the costs recorded on
10 DEBS’ accounting books. As the Company explained in response to AG discovery,
11 the Company has “not historically included the pension and OPEB regulatory assets
12 as part of rate base . . . Regulatory assets and liabilities, which simply represent
13 deferred gains/losses, are not considered when making financing decisions. Financing
14 decisions are made when assessing a plan’s Funded Status in accordance with funding
15 rules.”²⁶

16 If it is not correct to include a pension asset in rate base, and it is not, then the
17 DEBS pension asset should not be included in the DEBS rate base in the calculation
18 of this affiliate expense as a matter of consistency.

19

20 **Q. What is the effect of correcting this error?**

²⁵ Response to AG 2-27. I have attached a copy of that response as my Exhibit____(LK-11).

²⁶ *Id.*

1 A. The effect is a \$0.122 million reduction in the DEBS affiliate expense for its cost of
2 capital to eliminate the pension asset from the so-called rate base used by the Company
3 in its calculation of this expense.

4
5 **I. Utilize Consistent Service Life for All Depreciation Expense on Customer**
6 **Connect Plant In Service**
7

8 **Q. Describe the Company's proposed depreciation rates for the Customer Connect**
9 **plant accounts.**

10 A. The Company proposes two depreciation rates applicable to specific "projects," or
11 components of Customer Connect. The Company proposes a 20.0% depreciation rate
12 for the hardware projects and certain of the software projects, which reflects a 5-year
13 service life for these assets, and a 6.67% rate for certain other software projects, which
14 reflects a 15-year service life for these assets.²⁷

15
16 **Q. What is the Company's explanation for two different service lives and two**
17 **different depreciation rates for the various components of Customer Connect?**

18 A. The Company's only support for these service lives and depreciation rates is a memo
19 prepared by "Asset Accounting" dated July 20, 2017, which it provided in response to
20 AG discovery.²⁸ The Company claims that this memo is confidential, despite the fact
21 that it is the only support for the service lives and depreciation rates that it already has

²⁷ Response to AG 1-19. I have attached a copy of this response and the non-confidential attachments to the response as my Exhibit ___(LK-12).

²⁸ Confidential attachment provided in response to AG 1-19(d).

1 established and implemented and despite the fact that the memo recommends more
2 than two different depreciation rates.

3
4 **Q. Does the Company's explanation justify the two different service lives and two**
5 **different depreciation rates for the various components of Customer Connect?**

6 A. No. The Customer Connect should be viewed as an *integrated* system designed to
7 perform multiple related and interdependent functions and depreciated over the same
8 service life. There is no certainty as to the timing of future upgrades or the extent of
9 those upgrades. If there are subsequent upgrades, then they will be expensed or
10 capitalized when the costs actually are incurred. The integrated Customer Connect
11 has a service life of at least 15 years and this should be the minimum starting point for
12 this asset. The systems comprising the old CMS have been in service for more than
13 20 years.

14
15 **Q. What is your recommendation?**

16 A. I recommend that the Commission use a 15-year service life and a 6.67% depreciation
17 rate for all Customer Connect plant in service costs and the regulatory asset for the
18 deferred nonrecurring developmental costs that I previously addressed and
19 recommended. I recommend that the Commission direct the Company to modify the
20 20.0% depreciation rate that it is presently using for the hardware and certain software
21 project costs effective when base rates are reset in this proceeding. I recommend that
22 the Commission direct the Company not to reverse any prior depreciation already
23 recorded at the 20.0% rate prior to the date when base rates are reset in this proceeding.

1 The Company will fully recover its plant in service costs pursuant to my
2 recommendation; however, the use of the 6.67% depreciation rates will match the
3 recovery of the costs to the use of the Customer Connect system over its service life.
4

5 **Q. What is the effect of your recommendation?**

6 A. The effect is a reduction in the revenue requirement of \$0.059 million, consisting of a
7 reduction in depreciation expense of \$0.061 million and an increase in the return on
8 rate base of \$0.002 million due to the resulting reduction in accumulated depreciation
9 and increase in ADIT.
10

11 **IV. RATE OF RETURN ISSUES**
12

13 **A. Increase Short-Term Debt In Capital Structure To Reflect Historic Use of Short-**
14 **Term Debt Financing**
15

16 **Q. Describe the Company's forecast capital structure in the test year.**

17 A. The Company forecasts a capital structure with 50.70% common equity, 46.72% long-
18 term debt, and 2.58% short-term debt in the test year. The proposed short-term debt
19 consists of 2.15% for accounts receivables sold pursuant to a receivables agreement,
20 0.34% for current maturities of long-term debt, and 0.09% for money pool borrowings.
21

22 **Q. How does the Company's proposed capital structure compare to the base period**
23 **and prior calendar years?**

1 A. The Company proposes a significant increase in the common equity ratio and a
2 significant reduction in the short-term debt ratio, and in particular, the money pool
3 borrowings compared to the base period and prior calendar years. The following table
4 compares the proposed capital structure for the test year, base period, and calendar
5 years 2018 through 2020.
6

Duke Energy Kentucky, Inc. Capital Structure Comparison					
	Test Year	Base Year	Actual 2020	Actual 2019	Actual 2018
Short Term Debt	2.58%	10.97%	4.96%	5.95%	3.28%
Long Term Debt	46.72%	42.23%	47.87%	47.52%	46.42%
Common Equity	50.70%	46.81%	47.18%	46.53%	50.31%
Total Capital	100.00%	100.00%	100.00%	100.00%	100.00%

7

8

9 **Q. How does the Company's actual capital structure in 2019 and 2020 compare to**
10 **its proposed capital structure in Case No. 2018-00261?**

11 A. The Company's actual capital structure in 2019 and 2020 reflected significantly less
12 common equity and more short-term debt than the forecast for the test year ending
13 March 2020 in Case No. 2018-00261, its last base rate (gas) case. The following table
14 compares the forecast capital structure for the test year in that case as filed and as
15 approved by the Commission to the actual capital structures in 2019 and 2020.²⁹

²⁹The Company's forecast capital structure for the test year is shown on Schedule J-3 Forecast in Case No. 2018-00261. The Commission approved the Company's capital structure "as filed in the Company's Application" in the Order from that case at 6.

1

Duke Energy Kentucky, Inc. Capital Structure Comparison Case No. 2018-00261 Forecast and 2019 and 2020 Actuals			
	2018-00261		
	Test Year	Actual 2020	Actual 2019
Short Term Debt	2.58%	4.96%	5.95%
Long Term Debt	46.72%	47.87%	47.52%
Common Equity	50.70%	47.18%	46.53%
Total Capital	100.00%	100.00%	100.00%

2

3

4 **Q. Why is the comparison shown in the preceding table relevant?**

5 A. In the real world, not the hypothetical forecast world, the Company actually ran a
6 lower common equity ratio and a greater short-term debt ratio than the Commission
7 approved for the test year in its last base rate case proceeding. This strategy allowed
8 the Company to reduce its actual costs and increase its earnings compared to the
9 forecast costs included in the base revenue requirement and the resulting base revenue
10 increase approved by the Commission in the last proceeding.

11 In the real world, the Company actually and intentionally reduced its costs after
12 the Commission issued its Order in that proceeding. This experience highlights the
13 need for the Commission to assess the utility's forecast costs with a healthy degree of
14 skepticism, as I noted in the Summary section of my testimony, and to adjust the
15 forecast amounts if they are not consistent with known facts, historic practices, or
16 actual data.

1

2 **Q. How do the Company's proposed money pool borrowings in the test year**
3 **compare to the base period and prior calendar years?**

4 A. The forecast money pool borrowings in the test year are significantly less than the
5 Company's actual borrowings in the prior periods. Through its forecast assumptions,
6 the Company reduced the money pool borrowings for the test year compared to its
7 recent practice and increased the common equity invested by its parent company in
8 order to repay those borrowings. The money pool borrowings are the lowest cost
9 source of capital available to the Company other than vendor financing through
10 accounts payable, which are not typically included in the capital structure used to
11 develop the cost of capital for the rate of return. The following table compares the
12 proposed money pool borrowings in the test year to the base period and prior calendar
13 years.³⁰

14

³⁰Historic and projected monthly money pool balances were provided in response to AG 2-26. I have attached a copy of that response as my Exhibit__(LK-13).

Duke Energy Kentucky, Inc. Average Money Pool Balances \$ Millions	
	Average Amount
2018 Actual	48.657
2019 Actual	49.387
2020 Actual	73.028
Base Year	89.578
Test Year	1.574

1

2

3 **Q. What is a normalized and reasonable level of money pool borrowings based on**
4 **the Company's recent historic levels?**

5 A. A normalized and reasonable level of money pool borrowings would be \$50.000
6 million based on the Company's recent historic levels, which are *significantly* greater
7 than the Company's forecast of a mere \$1.574 million for the test year.

8

9 **Q. How did the Company achieve the increase in common equity and the reduction**
10 **in the money pool borrowings in the test year?**

11 A. The Company achieved this transformation to a richer common equity ratio and leaner
12 money pool borrowings ratio through its forecast assumptions. It assumed that its
13 parent company would invest approximately \$50 million in common equity in
14 September 2021, the month after the end of the base period. It assumed that these
15 funds would be used to reduce the money pool borrowings.³¹

³¹ Response to AG 1-47. The common equity increased to \$804.0 million in September 2021 from

1

2 **Q. What is your recommendation?**

3 A. I recommend that the Commission reflect \$50.000 million in money pool borrowings
4 in the proposed capital structure. I recommend that the Commission reduce common
5 equity by an equivalent amount. This is consistent with the Company's recent
6 experience and its likely financing in the future, especially given its experience in 2019
7 and 2020 when it intentionally ran a leaner common equity ratio and greater money
8 pool borrowings than its forecasts for the test year in Case No. 2018-00261.

9

10 **Q. What are the capital structure ratios and the weighted cost of capital based on**
11 **your recommendation?**

12 A. The following table compares the capital structure and weighted cost of capital (both
13 before and after gross-up for income taxes, bad debt expense, and Commission fees)
14 requested by the Company to my recommendation.

Duke Energy Kentucky, Inc. Capital Structure Comparison Company Request vs AG Recommendation					
As Filed by DEK					
	Capital Amount	%	Component Costs	Weighted Avg Costs	Grossed-Up COC
Short Term Debt					
Sale of Accounts Receivable	36,592,595	2.15%	1.34%	0.03%	0.03%
N/P - Money Pool	1,574,383	0.09%	0.28%	0.00%	0.00%
Current Maturities of LTD	5,769,231	0.34%	4.01%	0.01%	0.01%
Total Short Term Debt	43,936,209	2.58%	1.67%	0.04%	0.04%
Long Term Debt	794,320,510	46.72%	3.84%	1.79%	1.80%
Common Equity	861,861,344	50.69%	10.30%	5.22%	6.97%
Total Capital	1,700,118,063	100.00%		7.06%	8.81%
As Recommended by AG					
	Capital Amount	%	Component Costs	Weighted Avg Costs	Grossed-Up COC
Short Term Debt					
Sale of Accounts Receivable	36,592,595	2.15%	1.34%	0.03%	0.03%
N/P - Money Pool	50,000,000	2.94%	0.28%	0.01%	0.01%
Current Maturities of LTD	5,769,231	0.34%	4.01%	0.01%	0.01%
Total Short Term Debt	92,361,826	5.43%	0.94%	0.05%	0.05%
Long Term Debt	794,320,510	46.72%	3.80%	1.78%	1.78%
Common Equity	813,435,727	47.85%	9.10%	4.35%	5.81%
Total Capital	1,700,118,063	100.00%		6.18%	7.64%

1

2

3 **Q. What is the effect of your recommendation?**

4 A. The effect is a reduction of \$1.783 million in the base revenue requirement and the
5 requested base rate increase.

6

7 **B. Reduce Cost of Long-Term Debt To Reflect Company's Updated Forecast of**
8 **Lower Interest Rates For Issuances After Base Period And In Test Year**

1

2 **Q. Have you quantified the effect of Mr. Baudino's recommendation to use the**
3 **Company's most recent forecast of the interest rates for the September 2021 and**
4 **September 2022 long term debt issuances reflected in the test year average cost**
5 **of debt?**

6 A. Yes. The effect is a \$0.079 million reduction in the base revenue requirement and the
7 requested base rate increase. The lower interest rates on these two issuances reduce
8 the average cost of long term debt in the test year to 3.81% compared to the 3.84%
9 reflected in the Company's request.

10

11 **C. Reduce Cost of Long-Term Debt For Issuance In Test Year**

12

13 **Q. Have you quantified the effect of Mr. Baudino's recommendation to use the**
14 **Company's most recent forecast interest rate for the September 2021 long term**
15 **debt issuance as the interest rate for the September 2022 long term debt issuance?**

16 A. Yes. The effect is a \$0.009 million reduction in the base revenue requirement and the
17 requested base rate increase. The lower interest rate on the September 2022 issuance
18 further reduces the average cost of long-term debt in the test year to 3.80%.

19

20 **D. Reduce Return on Equity to 9.1%**

21

22 **Q. Have you quantified the effect of Mr. Baudino's recommendation for a 9.1%**
23 **return on equity?**

1 A. Yes. The effect is a reduction in the base revenue requirement and requested base rate
2 increase of \$3.555 million. Each 10 basis points in the return on equity is equivalent
3 to \$0.296 million in the base revenue requirement and requested base rate increase.
4

5 **V. GOVERNMENTAL MANDATE ADJUSTMENT RIDER**
6

7 **Q. Describe the Company’s request for a Governmental Mandate Adjustment**
8 **Rider.**

9 A. The Company seeks to establish and implement a “new Governmental Mandate
10 Adjustment mechanism (“Rider GMA”) to enable the Company to implement and
11 respond to governmental directives/mandates impacting the utility, including changes
12 in federal or state tax rates and regulations promulgated by the U.S. Department of
13 Transportation, Pipeline and Hazardous Materials Safety Administration
14 (PHMSA).”³²

15 If the Commission approves the mechanism and related tariff in this
16 proceeding, the Company will file a separate application to implement any adjustments
17 to Rider GMA in response to a governmental mandate. The application would be
18 subject to Commission determination of prudence and reasonableness. Significant
19 pipeline replacement projects required by a government mandate but that do not
20 constitute an ordinary extension of the existing system in the ordinary course of
21 business would be accompanied by a certificate of public convenience and necessity
22 (“CPCN”). The Company will make annual applications with the Commission to

³² Application at 5.

1 update Rider GMA, reflecting any new proposed capital projects and the depreciation
2 of previously approved capital projects as well as any changes to federal and state
3 income tax rates or changes to the amortization of unprotected excess or deficient
4 deferred income taxes.³³

5
6 **Q. Does the Company’s request reflect any limitations on what constitutes a**
7 **“governmental mandate”?**

8 A. No. The Company does not define “governmental mandate” or how it will determine
9 the scope or incremental costs of any such “governmental mandate” for purposes of
10 the proposed Rider GMA, although it states that it would include changes in federal or
11 state income tax rates and “infrastructure” costs incurred to comply with regulations
12 issued by PHMSA.

13
14 **Q. Is this problematic?**

15 A. Yes. This is problematic for several reasons. First, the opportunity for recovery of
16 costs between base rate cases through Rider GMA will provide the Company a strong
17 financial incentive to characterize costs as new or expanded “governmental
18 mandates.” Second, there will be a strong financial incentive to characterize costs as
19 new and “incremental” due to the new or expanded “governmental mandates.” Third,
20 as a practical matter, it is almost impossible to clearly distinguish between “new” and
21 “incremental” costs due to “new” or expanded “governmental mandates” from costs

³³Direct Testimony of Sarah Lawler at 9-10.

1 that would otherwise have been incurred in the normal course of business due to
2 existing “governmental mandates,” including the existing mandates resulting from the
3 PHMSA “Mega Rule.” Fourth, since the PHMSA Rules and Regulations are subject
4 to the utility’s interpretation, the utility has discretion as to its response to the Rules
5 and Regulations, and the Rules and Regulations continue to evolve and expand. Thus,
6 the utility’s responses to these Rules and Regulations are subject to its judgment as to
7 the scope and manner of compliance and likely will continue to evolve as well. If the
8 Commission approves the Rider GMA, then the ability to obtain contemporaneous
9 recovery of the costs that it incurs will likely factor into the Company’s judgment as a
10 simple matter of behavior and incentives.

11
12 **Q. Is the proposed Rider GMA necessary to address changes in federal and state**
13 **income tax rates?**

14 A. No. The Commission’s responses to prior changes in the federal income tax rate,
15 including the reductions pursuant to the Tax Cuts and Jobs Act (“TCJA”), did not
16 require a Rider GMA, nor is such a rider necessary for future changes. In response to
17 the prior changes, the Commission initiated generic and company-specific
18 proceedings for the gas and electric utilities subject to its ratemaking jurisdiction. This
19 approach has allowed the Commission to address the issues on a consistent statewide
20 basis while allowing for differences among the utilities based on their unique facts and
21 circumstances. In addition, there often are changes in the federal and state income tax
22 code that do not affect income tax rates, but do affect income tax expense, including
23 deductions and tax credits. If and when there are changes in the federal and state

1 income tax code, whether income tax rates or other changes, then the Commission's
2 historic approach is sufficient, and indeed, superior, to the Company's proposed Rider
3 GMA.

4
5 **Q. Is there be an expiration date on the proposed Rider GMA?**

6 A. No. There is no sunset provision. Essentially the proposed Rider GMA will result in
7 a parallel, and in many respects, an alternative ratemaking paradigm that will
8 permanently supplement, if not supersede in many respects, the existing base
9 ratemaking paradigm.

10
11 **Q. Does the existing base ratemaking paradigm adequately address "governmental**
12 **mandates"?**

13 A. Yes. The existing base ratemaking paradigm not only adequately addresses all
14 "governmental mandates," however they are defined or interpreted by the utility, but
15 is superior to the Rider GMA from a customer perspective. First, in the base
16 ratemaking paradigm, the Company utilizes a forecast test year, which means that it is
17 able to include its forecast capital costs in base rates on a timely basis. It does not
18 require the proposed Rider GMA to achieve that objective. Second, in the base
19 ratemaking paradigm, the Company has an inherent financial incentive to minimize its
20 capital (and operating) costs after base rates are reset in every base rate case
21 proceeding. This aligns the Company's interests with its customers' interests, unlike
22 the proposed Rider GMA, which eliminates this inherent financial incentive in the base

1 ratemaking process in exchange for the new financial incentive to incur capital costs
2 due to the accelerated ratemaking recovery.

3
4 **Q. What is your recommendation?**

5 A. I recommend that the Commission reject the Company’s request for a “governmental
6 mandates” rider in the form of the proposed Rider GMA. It is not necessary. It
7 provides a perverse incentive for the Company to characterize costs as due to
8 “governmental mandates,” increase the scope of the mandates, and increase the new
9 and incremental costs of such mandates. The Commission already has the capability
10 to address changes in the federal and state tax codes, including changes in income tax
11 rates. The existing base ratemaking paradigm already provides the Company recovery
12 of its reasonable costs to comply with “governmental mandates,” and provides
13 financial incentives for the Company to minimize the costs to comply with any such
14 “mandates” in a safe and efficient manner. Finally, the existing base ratemaking
15 paradigm avoids the administrative burden of proceedings to determine new or
16 expanded “governmental mandates” and the new or incremental costs of such
17 “governmental mandates” as well as the proposed annual Rider GMA proceedings.

18
19 **Q. If the Commission adopts a Rider GMA, do you have any recommendations to**
20 **protect customers from excessive costs and charges?**

21 A. Yes. First, I recommend that the Commission require the Company to establish a
22 baseline “inventory” of existing “governmental mandates,” the specific scope of work
23 that the Company plans to comply with each of those mandates for each of the next

1 ten years, and the cost to perform the specific scope of work for each of those mandates
2 in each of the next ten years. Only in this manner, is there any hope for the
3 Commission to determine what is a new governmental mandate and the incremental
4 cost to comply with the new mandate. Even still, the Commission will be hard pressed
5 to assess what is a new mandate and the incremental costs resulting from the mandate.

6 Second, to the extent that the new governmental mandate requires retirements
7 of existing plant in service, then the reduction in depreciation expense and any savings
8 due to reductions in maintenance expense on the existing plant in service, should be
9 credited to the Rider GMA and used to reduce the revenue requirement, as well as the
10 reduction in the rate base on the existing plant due to the ADIT effect of the
11 abandonment loss deduction for the remaining tax basis.

12 Third, to the extent that the Company determines that it is required or, in its
13 judgment, should replace any specific type of pipe or any other assets on a generic
14 basis, such as Aldyl-A pipe, on a system wide basis, then the Commission should limit
15 scope and recovery of the costs of such a program in the same manner that it has done
16 in the past for the Company and other utilities through a Pipeline Replacement Rider
17 form of recovery, to ensure that the project is properly and well managed, subject to:
18 (a) annual cost and recovery limitations; (b) a sunset provision; (c) reductions through
19 credits to the revenue requirement for savings in depreciation expense, savings in any
20 other expenses, and savings from the ADIT effect of the abandonment loss deduction
21 for the remaining tax basis of existing plant retirements.

1 Fourth, the Commission should adopt a lower return on equity for this rider,
2 consistent with Mr. Baudino's recommendation in this proceeding.

3

4 **Q. Does this complete your testimony?**

5 **A. Yes.**

AFFIDAVIT

STATE OF GEORGIA)

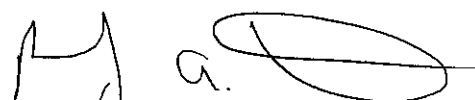
COUNTY OF FULTON)

LANE KOLLEN, being duly sworn, deposes and states: that the attached is his sworn testimony and that the statements contained are true and correct to the best of his knowledge, information and belief.



Lane Kollen

Sworn to and subscribed before me on this
1st day of September 2021.



Notary Public

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) CASE NO. 2021-00190
RATES; 2) APPROVAL OF NEW TARIFFS;)
3) ALL OTHER REQUIRED APPROVALS)
AND RELIEF)**

**EXHIBITS
OF
LANE KOLLEN**

**ON BEHALF OF THE
KENTUCKY OFFICE OF THE ATTORNEY GENERAL**

**J. KENNEDY AND ASSOCIATES, INC.
ROSWELL, GEORGIA**

SEPTEMBER 2021

EXHIBIT __ (LK-1)

RESUME OF LANE KOLLEN, VICE PRESIDENT

EDUCATION

University of Toledo, BBA
Accounting

University of Toledo, MBA

Luther Rice University, MA

PROFESSIONAL CERTIFICATIONS

Certified Public Accountant (CPA)

Certified Management Accountant (CMA)

Chartered Global Management Accountant (CGMA)

PROFESSIONAL AFFILIATIONS

American Institute of Certified Public Accountants

Georgia Society of Certified Public Accountants

Institute of Management Accountants

Society of Depreciation Professionals

Mr. Kollen has more than forty years of utility industry experience in the financial, rate, tax, and planning areas. He specializes in revenue requirements analyses, taxes, evaluation of rate and financial impacts of traditional and nontraditional ratemaking, utility mergers/acquisition and diversification. Mr. Kollen has expertise in proprietary and nonproprietary software systems used by utilities for budgeting, rate case support and strategic and financial planning.

RESUME OF LANE KOLLEN, VICE PRESIDENT

EXPERIENCE

1986 to

Present:

J. Kennedy and Associates, Inc.: Vice President and Principal. Responsible for utility stranded cost analysis, revenue requirements analysis, cash flow projections and solvency, financial and cash effects of traditional and nontraditional ratemaking, and research, speaking and writing on the effects of tax law changes. Testimony before Connecticut, Florida, Georgia, Indiana, Louisiana, Kentucky, Maine, Maryland, Minnesota, New York, North Carolina, Ohio, Pennsylvania, Tennessee, Texas, West Virginia and Wisconsin state regulatory commissions and the Federal Energy Regulatory Commission.

1983 to

1986:

Energy Management Associates: Lead Consultant.

Consulting in the areas of strategic and financial planning, traditional and nontraditional ratemaking, rate case support and testimony, diversification and generation expansion planning. Directed consulting and software development projects utilizing PROSCREEN II and ACUMEN proprietary software products. Utilized ACUMEN detailed corporate simulation system, PROSCREEN II strategic planning system and other custom developed software to support utility rate case filings including test year revenue requirements, rate base, operating income and pro-forma adjustments. Also utilized these software products for revenue simulation, budget preparation and cost-of-service analyses.

1976 to

1983:

The Toledo Edison Company: Planning Supervisor.

Responsible for financial planning activities including generation expansion planning, capital and expense budgeting, evaluation of tax law changes, rate case strategy and support and computerized financial modeling using proprietary and nonproprietary software products. Directed the modeling and evaluation of planning alternatives including:

Rate phase-ins.

Construction project cancellations and write-offs.

Construction project delays.

Capacity swaps.

Financing alternatives.

Competitive pricing for off-system sales.

Sale/leasebacks.

RESUME OF LANE KOLLEN, VICE PRESIDENT

CLIENTS SERVED

Industrial Companies and Groups

Air Products and Chemicals, Inc.	Lehigh Valley Power Committee
Airco Industrial Gases	Maryland Industrial Group
Alcan Aluminum	Multiple Intervenors (New York)
Armco Advanced Materials Co.	National Southwire
Armco Steel	North Carolina Industrial
Bethlehem Steel	Energy Consumers
CF&I Steel, L.P.	Occidental Chemical Corporation
Climax Molybdenum Company	Ohio Energy Group
Connecticut Industrial Energy Consumers	Ohio Industrial Energy Consumers
ELCON	Ohio Manufacturers Association
Enron Gas Pipeline Company	Philadelphia Area Industrial Energy
Florida Industrial Power Users Group	Users Group
Gallatin Steel	PSI Industrial Group
General Electric Company	Smith Cogeneration
GPU Industrial Intervenors	Taconite Intervenors (Minnesota)
Indiana Industrial Group	West Penn Power Industrial Intervenors
Industrial Consumers for	West Virginia Energy Users Group
Fair Utility Rates - Indiana	Westvaco Corporation
Industrial Energy Consumers - Ohio	
Kentucky Industrial Utility Customers, Inc.	
Kimberly-Clark Company	

Regulatory Commissions and Government Agencies

Cities in Texas-New Mexico Power Company's Service Territory
Cities in AEP Texas Central Company's Service Territory
Cities in AEP Texas North Company's Service Territory
City of Austin
Georgia Public Service Commission Staff
Florida Office of Public Counsel
Indiana Office of Utility Consumer Counsel
Kentucky Office of Attorney General
Louisiana Public Service Commission
Louisiana Public Service Commission Staff
Maine Office of Public Advocate
New York City
New York State Energy Office
South Carolina Office of Regulatory Staff
Texas Office of Public Utility Counsel
Utah Office of Consumer Services

RESUME OF LANE KOLLEN, VICE PRESIDENT

Utilities

Allegheny Power System	Otter Tail Power Company
Atlantic City Electric Company	Pacific Gas & Electric Company
Carolina Power & Light Company	Public Service Electric & Gas
Cleveland Electric Illuminating Company	Public Service of Oklahoma
Delmarva Power & Light Company	Rochester Gas and Electric
Duquesne Light Company	Savannah Electric & Power Company
General Public Utilities	Seminole Electric Cooperative
Georgia Power Company	Southern California Edison
Middle South Services	Talquin Electric Cooperative
Nevada Power Company	Tampa Electric
Niagara Mohawk Power Corporation	Texas Utilities
	Toledo Edison Company

**Expert Testimony Appearances
of
Lane Kollen
As of August 2021**

Date	Case	Jurisdic.	Party	Utility	Subject
10/86	U-17282 Interim	LA	Louisiana Public Service Commission Staff	Gulf States Utilities	Cash revenue requirements financial solvency.
11/86	U-17282 Interim Rebuttal	LA	Louisiana Public Service Commission Staff	Gulf States Utilities	Cash revenue requirements financial solvency.
12/86	9613	KY	Attorney General Div. of Consumer Protection	Big Rivers Electric Corp.	Revenue requirements accounting adjustments financial workout plan.
1/87	U-17282 Interim	LA 19th Judicial District Ct.	Louisiana Public Service Commission Staff	Gulf States Utilities	Cash revenue requirements, financial solvency.
3/87	General Order 236	WV	West Virginia Energy Users' Group	Monongahela Power Co.	Tax Reform Act of 1986.
4/87	U-17282 Prudence	LA	Louisiana Public Service Commission Staff	Gulf States Utilities	Prudence of River Bend 1, economic analyses, cancellation studies.
4/87	M-100 Sub 113	NC	North Carolina Industrial Energy Consumers	Duke Power Co.	Tax Reform Act of 1986.
5/87	86-524-E-SC	WV	West Virginia Energy Users' Group	Monongahela Power Co.	Revenue requirements, Tax Reform Act of 1986.
5/87	U-17282 Case In Chief	LA	Louisiana Public Service Commission Staff	Gulf States Utilities	Revenue requirements, River Bend 1 phase-in plan, financial solvency.
7/87	U-17282 Case In Chief Surrebuttal	LA	Louisiana Public Service Commission Staff	Gulf States Utilities	Revenue requirements, River Bend 1 phase-in plan, financial solvency.
7/87	U-17282 Prudence Surrebuttal	LA	Louisiana Public Service Commission Staff	Gulf States Utilities	Prudence of River Bend 1, economic analyses, cancellation studies.
7/87	86-524 E-SC Rebuttal	WV	West Virginia Energy Users' Group	Monongahela Power Co.	Revenue requirements, Tax Reform Act of 1986.
8/87	9885	KY	Attorney General Div. of Consumer Protection	Big Rivers Electric Corp.	Financial workout plan.
8/87	E-015/GR-87-223	MN	Taconite Intervenors	Minnesota Power & Light Co.	Revenue requirements, O&M expense, Tax Reform Act of 1986.
10/87	870220-EI	FL	Occidental Chemical Corp.	Florida Power Corp.	Revenue requirements, O&M expense, Tax Reform Act of 1986.
11/87	87-07-01	CT	Connecticut Industrial Energy Consumers	Connecticut Light & Power Co.	Tax Reform Act of 1986.
1/88	U-17282	LA 19th Judicial District Ct.	Louisiana Public Service Commission	Gulf States Utilities	Revenue requirements, River Bend 1 phase-in plan, rate of return.
2/88	9934	KY	Kentucky Industrial Utility Customers	Louisville Gas & Electric Co.	Economics of Trimble County, completion.
2/88	10064	KY	Kentucky Industrial Utility	Louisville Gas &	Revenue requirements, O&M expense, capital

**Expert Testimony Appearances
of
Lane Kollen
As of August 2021**

Date	Case	Jurisdct.	Party	Utility	Subject
			Customers	Electric Co.	structure, excess deferred income taxes.
5/88	10217	KY	Alcan Aluminum National Southwire	Big Rivers Electric Corp.	Financial workout plan.
5/88	M-87017-1C001	PA	GPU Industrial Intervenors	Metropolitan Edison Co.	Nonutility generator deferred cost recovery.
5/88	M-87017-2C005	PA	GPU Industrial Intervenors	Pennsylvania Electric Co.	Nonutility generator deferred cost recovery.
6/88	U-17282	LA 19th Judicial District Ct.	Louisiana Public Service Commission	Gulf States Utilities	Prudence of River Bend 1 economic analyses, cancellation studies, financial modeling.
7/88	M-87017-1C001 Rebuttal	PA	GPU Industrial Intervenors	Metropolitan Edison Co.	Nonutility generator deferred cost recovery, SFAS No. 92.
7/88	M-87017-2C005 Rebuttal	PA	GPU Industrial Intervenors	Pennsylvania Electric Co.	Nonutility generator deferred cost recovery, SFAS No. 92.
9/88	88-05-25	CT	Connecticut Industrial Energy Consumers	Connecticut Light & Power Co.	Excess deferred taxes, O&M expenses.
9/88	10064 Rehearing	KY	Kentucky Industrial Utility Customers	Louisville Gas & Electric Co.	Premature retirements, interest expense.
10/88	88-170-EL-AIR	OH	Ohio Industrial Energy Consumers	Cleveland Electric Illuminating Co.	Revenue requirements, phase-in, excess deferred taxes, O&M expenses, financial considerations, working capital.
10/88	88-171-EL-AIR	OH	Ohio Industrial Energy Consumers	Toledo Edison Co.	Revenue requirements, phase-in, excess deferred taxes, O&M expenses, financial considerations, working capital.
10/88	8800-355-EI	FL	Florida Industrial Power Users' Group	Florida Power & Light Co.	Tax Reform Act of 1986, tax expenses, O&M expenses, pension expense (SFAS No. 87).
10/88	3780-U	GA	Georgia Public Service Commission Staff	Atlanta Gas Light Co.	Pension expense (SFAS No. 87).
11/88	U-17282 Remand	LA	Louisiana Public Service Commission Staff	Gulf States Utilities	Rate base exclusion plan (SFAS No. 71).
12/88	U-17970	LA	Louisiana Public Service Commission Staff	AT&T Communications of South Central States	Pension expense (SFAS No. 87).
12/88	U-17949 Rebuttal	LA	Louisiana Public Service Commission Staff	South Central Bell	Compensated absences (SFAS No. 43), pension expense (SFAS No. 87), Part 32, income tax normalization.
2/89	U-17282 Phase II	LA	Louisiana Public Service Commission Staff	Gulf States Utilities	Revenue requirements, phase-in of River Bend 1, recovery of canceled plant.
6/89	881602-EU 890326-EU	FL	Talquin Electric Cooperative	Talquin/City of Tallahassee	Economic analyses, incremental cost-of-service, average customer rates.

**Expert Testimony Appearances
of
Lane Kollen
As of August 2021**

Date	Case	Jurisdct.	Party	Utility	Subject
7/89	U-17970	LA	Louisiana Public Service Commission Staff	AT&T Communications of South Central States	Pension expense (SFAS No. 87), compensated absences (SFAS No. 43), Part 32.
8/89	8555	TX	Occidental Chemical Corp.	Houston Lighting & Power Co.	Cancellation cost recovery, tax expense, revenue requirements.
8/89	3840-U	GA	Georgia Public Service Commission Staff	Georgia Power Co.	Promotional practices, advertising, economic development.
9/89	U-17282 Phase II Detailed	LA	Louisiana Public Service Commission Staff	Gulf States Utilities	Revenue requirements, detailed investigation.
10/89	8880	TX	Enron Gas Pipeline	Texas-New Mexico Power Co.	Deferred accounting treatment, sale/leaseback.
10/89	8928	TX	Enron Gas Pipeline	Texas-New Mexico Power Co.	Revenue requirements, imputed capital structure, cash working capital.
10/89	R-891364	PA	Philadelphia Area Industrial Energy Users Group	Philadelphia Electric Co.	Revenue requirements.
11/89 12/89	R-891364 Surrebuttal (2 Filings)	PA	Philadelphia Area Industrial Energy Users Group	Philadelphia Electric Co.	Revenue requirements, sale/leaseback.
1/90	U-17282 Phase II Detailed Rebuttal	LA	Louisiana Public Service Commission Staff	Gulf States Utilities	Revenue requirements, detailed investigation.
1/90	U-17282 Phase III	LA	Louisiana Public Service Commission Staff	Gulf States Utilities	Phase-in of River Bend 1, deregulated asset plan.
3/90	890319-EI	FL	Florida Industrial Power Users Group	Florida Power & Light Co.	O&M expenses, Tax Reform Act of 1986.
4/90	890319-EI Rebuttal	FL	Florida Industrial Power Users Group	Florida Power & Light Co.	O&M expenses, Tax Reform Act of 1986.
4/90	U-17282	LA 19 th Judicial District Ct.	Louisiana Public Service Commission	Gulf States Utilities	Fuel clause, gain on sale of utility assets.
9/90	90-158	KY	Kentucky Industrial Utility Customers	Louisville Gas & Electric Co.	Revenue requirements, post-test year additions, forecasted test year.
12/90	U-17282 Phase IV	LA	Louisiana Public Service Commission Staff	Gulf States Utilities	Revenue requirements.
3/91	29327, et. al.	NY	Multiple Intervenors	Niagara Mohawk Power Corp.	Incentive regulation.
5/91	9945	TX	Office of Public Utility Counsel of Texas	El Paso Electric Co.	Financial modeling, economic analyses, prudence of Palo Verde 3.

**Expert Testimony Appearances
of
Lane Kollen
As of August 2021**

Date	Case	Jurisdic.	Party	Utility	Subject
9/91	P-910511 P-910512	PA	Allegheny Ludlum Corp., Armco Advanced Materials Co., The West Penn Power Industrial Users' Group	West Penn Power Co.	Recovery of CAAA costs, least cost financing.
9/91	91-231-E-NC	WV	West Virginia Energy Users Group	Monongahela Power Co.	Recovery of CAAA costs, least cost financing.
11/91	U-17282	LA	Louisiana Public Service Commission Staff	Gulf States Utilities	Asset impairment, deregulated asset plan, revenue requirements.
12/91	91-410-EL-AIR	OH	Air Products and Chemicals, Inc., Armco Steel Co., General Electric Co., Industrial Energy Consumers	Cincinnati Gas & Electric Co.	Revenue requirements, phase-in plan.
12/91	PUC Docket 10200	TX	Office of Public Utility Counsel of Texas	Texas-New Mexico Power Co.	Financial integrity, strategic planning, declined business affiliations.
5/92	910890-EI	FL	Occidental Chemical Corp.	Florida Power Corp.	Revenue requirements, O&M expense, pension expense, OPEB expense, fossil dismantling, nuclear decommissioning.
8/92	R-00922314	PA	GPU Industrial Intervenors	Metropolitan Edison Co.	Incentive regulation, performance rewards, purchased power risk, OPEB expense.
9/92	92-043	KY	Kentucky Industrial Utility Consumers	Generic Proceeding	OPEB expense.
9/92	920324-EI	FL	Florida Industrial Power Users' Group	Tampa Electric Co.	OPEB expense.
9/92	39348	IN	Indiana Industrial Group	Generic Proceeding	OPEB expense.
9/92	910840-PU	FL	Florida Industrial Power Users' Group	Generic Proceeding	OPEB expense.
9/92	39314	IN	Industrial Consumers for Fair Utility Rates	Indiana Michigan Power Co.	OPEB expense.
11/92	U-19904	LA	Louisiana Public Service Commission Staff	Gulf States Utilities /Entergy Corp.	Merger.
11/92	8469	MD	Westvaco Corp., Eastalco Aluminum Co.	Potomac Edison Co.	OPEB expense.
11/92	92-1715-AU-COI	OH	Ohio Manufacturers Association	Generic Proceeding	OPEB expense.
12/92	R-00922378	PA	Armco Advanced Materials Co., The WPP Industrial Intervenors	West Penn Power Co.	Incentive regulation, performance rewards, purchased power risk, OPEB expense.
12/92	U-19949	LA	Louisiana Public Service Commission Staff	South Central Bell	Affiliate transactions, cost allocations, merger.

**Expert Testimony Appearances
of
Lane Kollen
As of August 2021**

Date	Case	Jurisdic.	Party	Utility	Subject
12/92	R-00922479	PA	Philadelphia Area Industrial Energy Users' Group	Philadelphia Electric Co.	OPEB expense.
1/93	8487	MD	Maryland Industrial Group	Baltimore Gas & Electric Co., Bethlehem Steel Corp.	OPEB expense, deferred fuel, CWIP in rate base.
1/93	39498	IN	PSI Industrial Group	PSI Energy, Inc.	Refunds due to over-collection of taxes on Marble Hill cancellation.
3/93	92-11-11	CT	Connecticut Industrial Energy Consumers	Connecticut Light & Power Co	OPEB expense.
3/93	U-19904 (Surrebuttal)	LA	Louisiana Public Service Commission Staff	Gulf States Utilities /Entergy Corp.	Merger.
3/93	93-01-EL-EFC	OH	Ohio Industrial Energy Consumers	Ohio Power Co.	Affiliate transactions, fuel.
3/93	EC92-21000 ER92-806-000	FERC	Louisiana Public Service Commission Staff	Gulf States Utilities /Entergy Corp.	Merger.
4/93	92-1464-EL-AIR	OH	Air Products Armco Steel Industrial Energy Consumers	Cincinnati Gas & Electric Co.	Revenue requirements, phase-in plan.
4/93	EC92-21000 ER92-806-000 (Rebuttal)	FERC	Louisiana Public Service Commission	Gulf States Utilities /Entergy Corp.	Merger.
9/93	93-113	KY	Kentucky Industrial Utility Customers	Kentucky Utilities	Fuel clause and coal contract refund.
9/93	92-490, 92-490A, 90-360-C	KY	Kentucky Industrial Utility Customers and Kentucky Attorney General	Big Rivers Electric Corp.	Disallowances and restitution for excessive fuel costs, illegal and improper payments, recovery of mine closure costs.
10/93	U-17735	LA	Louisiana Public Service Commission Staff	Cajun Electric Power Cooperative	Revenue requirements, debt restructuring agreement, River Bend cost recovery.
1/94	U-20647	LA	Louisiana Public Service Commission Staff	Gulf States Utilities Co.	Audit and investigation into fuel clause costs.
4/94	U-20647 (Surrebuttal)	LA	Louisiana Public Service Commission Staff	Gulf States Utilities Co.	Nuclear and fossil unit performance, fuel costs, fuel clause principles and guidelines.
4/94	U-20647 (Supplemental Surrebuttal)	LA	Louisiana Public Service Commission Staff	Gulf States Utilities Co.	Audit and investigation into fuel clause costs.
5/94	U-20178	LA	Louisiana Public Service Commission Staff	Louisiana Power & Light Co.	Planning and quantification issues of least cost integrated resource plan.
9/94	U-19904 Initial Post-Merger Earnings Review	LA	Louisiana Public Service Commission Staff	Gulf States Utilities Co.	River Bend phase-in plan, deregulated asset plan, capital structure, other revenue requirement issues.

**Expert Testimony Appearances
of
Lane Kollen
As of August 2021**

Date	Case	Jurisdic.	Party	Utility	Subject
9/94	U-17735	LA	Louisiana Public Service Commission Staff	Cajun Electric Power Cooperative	G&T cooperative ratemaking policies, exclusion of River Bend, other revenue requirement issues.
10/94	3905-U	GA	Georgia Public Service Commission Staff	Southern Bell Telephone Co.	Incentive rate plan, earnings review.
10/94	5258-U	GA	Georgia Public Service Commission Staff	Southern Bell Telephone Co.	Alternative regulation, cost allocation.
11/94	U-19904 Initial Post-Merger Earnings Review (Surrebuttal)	LA	Louisiana Public Service Commission Staff	Gulf States Utilities Co.	River Bend phase-in plan, deregulated asset plan, capital structure, other revenue requirement issues.
11/94	U-17735 (Rebuttal)	LA	Louisiana Public Service Commission Staff	Cajun Electric Power Cooperative	G&T cooperative ratemaking policy, exclusion of River Bend, other revenue requirement issues.
4/95	R-00943271	PA	PP&L Industrial Customer Alliance	Pennsylvania Power & Light Co.	Revenue requirements. Fossil dismantling, nuclear decommissioning.
6/95	3905-U Rebuttal	GA	Georgia Public Service Commission	Southern Bell Telephone Co.	Incentive regulation, affiliate transactions, revenue requirements, rate refund.
6/95	U-19904 (Direct)	LA	Louisiana Public Service Commission Staff	Gulf States Utilities Co.	Gas, coal, nuclear fuel costs, contract prudence, base/fuel realignment.
10/95	95-02614	TN	Tennessee Office of the Attorney General Consumer Advocate	BellSouth Telecommunications, Inc.	Affiliate transactions.
10/95	U-21485 (Direct)	LA	Louisiana Public Service Commission Staff	Gulf States Utilities Co.	Nuclear O&M, River Bend phase-in plan, base/fuel realignment, NOL and AltMin asset deferred taxes, other revenue requirement issues.
11/95	U-19904 (Surrebuttal)	LA	Louisiana Public Service Commission Staff	Gulf States Utilities Co. Division	Gas, coal, nuclear fuel costs, contract prudence, base/fuel realignment.
11/95	U-21485 (Supplemental Direct)	LA	Louisiana Public Service Commission Staff	Gulf States Utilities Co.	Nuclear O&M, River Bend phase-in plan, base/fuel realignment, NOL and AltMin asset deferred taxes, other revenue requirement issues.
12/95	U-21485 (Surrebuttal)				
1/96	95-299-EL-AIR 95-300-EL-AIR	OH	Industrial Energy Consumers	The Toledo Edison Co., The Cleveland Electric Illuminating Co.	Competition, asset write-offs and revaluation, O&M expense, other revenue requirement issues.
2/96	PUC Docket 14965	TX	Office of Public Utility Counsel	Central Power & Light	Nuclear decommissioning.
5/96	95-485-LCS	NM	City of Las Cruces	El Paso Electric Co.	Stranded cost recovery, municipalization.
7/96	8725	MD	The Maryland Industrial Group and Redland Genstar, Inc.	Baltimore Gas & Electric Co., Potomac Electric Power Co., and Constellation Energy Corp.	Merger savings, tracking mechanism, earnings sharing plan, revenue requirement issues.

**Expert Testimony Appearances
of
Lane Kollen
As of August 2021**

Date	Case	Jurisdic.	Party	Utility	Subject
9/96 11/96	U-22092 U-22092 (Surrebuttal)	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	River Bend phase-in plan, base/fuel realignment, NOL and AltMin asset deferred taxes, other revenue requirement issues, allocation of regulated/nonregulated costs.
10/96	96-327	KY	Kentucky Industrial Utility Customers, Inc.	Big Rivers Electric Corp.	Environmental surcharge recoverable costs.
2/97	R-00973877	PA	Philadelphia Area Industrial Energy Users Group	PECO Energy Co.	Stranded cost recovery, regulatory assets and liabilities, intangible transition charge, revenue requirements.
3/97	96-489	KY	Kentucky Industrial Utility Customers, Inc.	Kentucky Power Co.	Environmental surcharge recoverable costs, system agreements, allowance inventory, jurisdictional allocation.
6/97	TO-97-397	MO	MCI Telecommunications Corp., Inc., MCImetro Access Transmission Services, Inc.	Southwestern Bell Telephone Co.	Price cap regulation, revenue requirements, rate of return.
6/97	R-00973953	PA	Philadelphia Area Industrial Energy Users Group	PECO Energy Co.	Restructuring, deregulation, stranded costs, regulatory assets, liabilities, nuclear and fossil decommissioning.
7/97	R-00973954	PA	PP&L Industrial Customer Alliance	Pennsylvania Power & Light Co.	Restructuring, deregulation, stranded costs, regulatory assets, liabilities, nuclear and fossil decommissioning.
7/97	U-22092	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Depreciation rates and methodologies, River Bend phase-in plan.
8/97	97-300	KY	Kentucky Industrial Utility Customers, Inc.	Louisville Gas & Electric Co., Kentucky Utilities Co.	Merger policy, cost savings, surcredit sharing mechanism, revenue requirements, rate of return.
8/97	R-00973954 (Surrebuttal)	PA	PP&L Industrial Customer Alliance	Pennsylvania Power & Light Co.	Restructuring, deregulation, stranded costs, regulatory assets, liabilities, nuclear and fossil decommissioning.
10/97	97-204	KY	Alcan Aluminum Corp. Southwire Co.	Big Rivers Electric Corp.	Restructuring, revenue requirements, reasonableness.
10/97	R-974008	PA	Metropolitan Edison Industrial Users Group	Metropolitan Edison Co.	Restructuring, deregulation, stranded costs, regulatory assets, liabilities, nuclear and fossil decommissioning, revenue requirements.
10/97	R-974009	PA	Penelec Industrial Customer Alliance	Pennsylvania Electric Co.	Restructuring, deregulation, stranded costs, regulatory assets, liabilities, nuclear and fossil decommissioning, revenue requirements.
11/97	97-204 (Rebuttal)	KY	Alcan Aluminum Corp. Southwire Co.	Big Rivers Electric Corp.	Restructuring, revenue requirements, reasonableness of rates, cost allocation.
11/97	U-22491	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Allocation of regulated and nonregulated costs, other revenue requirement issues.

**Expert Testimony Appearances
of
Lane Kollen
As of August 2021**

Date	Case	Jurisdic.	Party	Utility	Subject
11/97	R-00973953 (Surrebuttal)	PA	Philadelphia Area Industrial Energy Users Group	PECO Energy Co.	Restructuring, deregulation, stranded costs, regulatory assets, liabilities, nuclear and fossil decommissioning.
11/97	R-973981	PA	West Penn Power Industrial Intervenor	West Penn Power Co.	Restructuring, deregulation, stranded costs, regulatory assets, liabilities, fossil decommissioning, revenue requirements, securitization.
11/97	R-974104	PA	Duquesne Industrial Intervenor	Duquesne Light Co.	Restructuring, deregulation, stranded costs, regulatory assets, liabilities, nuclear and fossil decommissioning, revenue requirements, securitization.
12/97	R-973981 (Surrebuttal)	PA	West Penn Power Industrial Intervenor	West Penn Power Co.	Restructuring, deregulation, stranded costs, regulatory assets, liabilities, fossil decommissioning, revenue requirements.
12/97	R-974104 (Surrebuttal)	PA	Duquesne Industrial Intervenor	Duquesne Light Co.	Restructuring, deregulation, stranded costs, regulatory assets, liabilities, nuclear and fossil decommissioning, revenue requirements, securitization.
1/98	U-22491 (Surrebuttal)	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Allocation of regulated and nonregulated costs, other revenue requirement issues.
2/98	8774	MD	Westvaco	Potomac Edison Co.	Merger of Duquesne, AE, customer safeguards, savings sharing.
3/98	U-22092 (Allocated Stranded Cost Issues)	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Restructuring, stranded costs, regulatory assets, securitization, regulatory mitigation.
3/98	8390-U	GA	Georgia Natural Gas Group, Georgia Textile Manufacturers Assoc.	Atlanta Gas Light Co.	Restructuring, unbundling, stranded costs, incentive regulation, revenue requirements.
3/98	U-22092 (Allocated Stranded Cost Issues) (Surrebuttal)	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Restructuring, stranded costs, regulatory assets, securitization, regulatory mitigation.
3/98	U-22491 (Supplemental Surrebuttal)	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Allocation of regulated and nonregulated costs, other revenue requirement issues.
10/98	97-596	ME	Maine Office of the Public Advocate	Bangor Hydro-Electric Co.	Restructuring, unbundling, stranded costs, T&D revenue requirements.
10/98	9355-U	GA	Georgia Public Service Commission Adversary Staff	Georgia Power Co.	Affiliate transactions.
10/98	U-17735 Rebuttal	LA	Louisiana Public Service Commission Staff	Cajun Electric Power Cooperative	G&T cooperative ratemaking policy, other revenue requirement issues.

**Expert Testimony Appearances
of
Lane Kollen
As of August 2021**

Date	Case	Jurisdct.	Party	Utility	Subject
11/98	U-23327	LA	Louisiana Public Service Commission Staff	SWEPCO, CSW and AEP	Merger policy, savings sharing mechanism, affiliate transaction conditions.
12/98	U-23358 (Direct)	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Allocation of regulated and nonregulated costs, tax issues, and other revenue requirement issues.
12/98	98-577	ME	Maine Office of Public Advocate	Maine Public Service Co.	Restructuring, unbundling, stranded cost, T&D revenue requirements.
1/99	98-10-07	CT	Connecticut Industrial Energy Consumers	United Illuminating Co.	Stranded costs, investment tax credits, accumulated deferred income taxes, excess deferred income taxes.
3/99	U-23358 (Surrebuttal)	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Allocation of regulated and nonregulated costs, tax issues, and other revenue requirement issues.
3/99	98-474	KY	Kentucky Industrial Utility Customers, Inc.	Louisville Gas and Electric Co.	Revenue requirements, alternative forms of regulation.
3/99	98-426	KY	Kentucky Industrial Utility Customers, Inc.	Kentucky Utilities Co.	Revenue requirements, alternative forms of regulation.
3/99	99-082	KY	Kentucky Industrial Utility Customers, Inc.	Louisville Gas and Electric Co.	Revenue requirements.
3/99	99-083	KY	Kentucky Industrial Utility Customers, Inc.	Kentucky Utilities Co.	Revenue requirements.
4/99	U-23358 (Supplemental Surrebuttal)	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Allocation of regulated and nonregulated costs, tax issues, and other revenue requirement issues.
4/99	99-03-04	CT	Connecticut Industrial Energy Consumers	United Illuminating Co.	Regulatory assets and liabilities, stranded costs, recovery mechanisms.
4/99	99-02-05	CT	Connecticut Industrial Utility Customers	Connecticut Light and Power Co.	Regulatory assets and liabilities, stranded costs, recovery mechanisms.
5/99	98-426 99-082 (Additional Direct)	KY	Kentucky Industrial Utility Customers, Inc.	Louisville Gas and Electric Co.	Revenue requirements.
5/99	98-474 99-083 (Additional Direct)	KY	Kentucky Industrial Utility Customers, Inc.	Kentucky Utilities Co.	Revenue requirements.
5/99	98-426 98-474 (Response to Amended Applications)	KY	Kentucky Industrial Utility Customers, Inc.	Louisville Gas and Electric Co., Kentucky Utilities Co.	Alternative regulation.
6/99	97-596	ME	Maine Office of Public Advocate	Bangor Hydro-Electric Co.	Request for accounting order regarding electric industry restructuring costs.
7/99	U-23358	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Affiliate transactions, cost allocations.

**Expert Testimony Appearances
of
Lane Kollen
As of August 2021**

Date	Case	Jurisdct.	Party	Utility	Subject
7/99	99-03-35	CT	Connecticut Industrial Energy Consumers	United Illuminating Co.	Stranded costs, regulatory assets, tax effects of asset divestiture.
7/99	U-23327	LA	Louisiana Public Service Commission Staff	Southwestern Electric Power Co., Central and South West Corp, American Electric Power Co.	Merger Settlement and Stipulation.
7/99	97-596 Surrebuttal	ME	Maine Office of Public Advocate	Bangor Hydro-Electric Co.	Restructuring, unbundling, stranded cost, T&D revenue requirements.
7/99	98-0452-E-GI	WV	West Virginia Energy Users Group	Monongahela Power, Potomac Edison, Appalachian Power, Wheeling Power	Regulatory assets and liabilities.
8/99	98-577 Surrebuttal	ME	Maine Office of Public Advocate	Maine Public Service Co.	Restructuring, unbundling, stranded costs, T&D revenue requirements.
8/99	98-426 99-082 Rebuttal	KY	Kentucky Industrial Utility Customers, Inc.	Louisville Gas and Electric Co.	Revenue requirements.
8/99	98-474 98-083 Rebuttal	KY	Kentucky Industrial Utility Customers, Inc.	Kentucky Utilities Co.	Revenue requirements.
8/99	98-0452-E-GI Rebuttal	WV	West Virginia Energy Users Group	Monongahela Power, Potomac Edison, Appalachian Power, Wheeling Power	Regulatory assets and liabilities.
10/99	U-24182 Direct	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Allocation of regulated and nonregulated costs, affiliate transactions, tax issues, and other revenue requirement issues.
11/99	PUC Docket 21527	TX	The Dallas-Fort Worth Hospital Council and Coalition of Independent Colleges and Universities	TXU Electric	Restructuring, stranded costs, taxes, securitization.
11/99	U-23358 Surrebuttal Affiliate Transactions Review	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Service company affiliate transaction costs.
01/00	U-24182 Surrebuttal	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Allocation of regulated and nonregulated costs, affiliate transactions, tax issues, and other revenue requirement issues.
04/00	99-1212-EL-ETP 99-1213-EL-ATA 99-1214-EL-AAM	OH	Greater Cleveland Growth Association	First Energy (Cleveland Electric Illuminating, Toledo Edison)	Historical review, stranded costs, regulatory assets, liabilities.

**Expert Testimony Appearances
of
Lane Kollen
As of August 2021**

Date	Case	Jurisdic.	Party	Utility	Subject
05/00	2000-107	KY	Kentucky Industrial Utility Customers, Inc.	Kentucky Power Co.	ECR surcharge roll-in to base rates.
05/00	U-24182 Supplemental Direct	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Affiliate expense proforma adjustments.
05/00	A-110550F0147	PA	Philadelphia Area Industrial Energy Users Group	PECO Energy	Merger between PECO and Unicom.
05/00	99-1658-EL-ETP	OH	AK Steel Corp.	Cincinnati Gas & Electric Co.	Regulatory transition costs, including regulatory assets and liabilities, SFAS 109, ADIT, EDIT, ITC.
07/00	PUC Docket 22344	TX	The Dallas-Fort Worth Hospital Council and The Coalition of Independent Colleges and Universities	Statewide Generic Proceeding	Escalation of O&M expenses for unbundled T&D revenue requirements in projected test year.
07/00	U-21453	LA	Louisiana Public Service Commission	SWEPCO	Stranded costs, regulatory assets and liabilities.
08/00	U-24064	LA	Louisiana Public Service Commission Staff	CLECO	Affiliate transaction pricing ratemaking principles, subsidization of nonregulated affiliates, ratemaking adjustments.
10/00	SOAH Docket 473-00-1015 PUC Docket 22350	TX	The Dallas-Fort Worth Hospital Council and The Coalition of Independent Colleges and Universities	TXU Electric Co.	Restructuring, T&D revenue requirements, mitigation, regulatory assets and liabilities.
10/00	R-00974104 Affidavit	PA	Duquesne Industrial Intervenor	Duquesne Light Co.	Final accounting for stranded costs, including treatment of auction proceeds, taxes, capital costs, switchback costs, and excess pension funding.
11/00	P-00001837 R-00974008 P-00001838 R-00974009	PA	Metropolitan Edison Industrial Users Group Penelec Industrial Customer Alliance	Metropolitan Edison Co., Pennsylvania Electric Co.	Final accounting for stranded costs, including treatment of auction proceeds, taxes, regulatory assets and liabilities, transaction costs.
12/00	U-21453, U-20925, U-22092 (Subdocket C) Surrebuttal	LA	Louisiana Public Service Commission Staff	SWEPCO	Stranded costs, regulatory assets.
01/01	U-24993 Direct	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Allocation of regulated and nonregulated costs, tax issues, and other revenue requirement issues.
01/01	U-21453, U-20925, U-22092 (Subdocket B) Surrebuttal	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Industry restructuring, business separation plan, organization structure, hold harmless conditions, financing.
01/01	Case No. 2000-386	KY	Kentucky Industrial Utility Customers, Inc.	Louisville Gas & Electric Co.	Recovery of environmental costs, surcharge mechanism.

**Expert Testimony Appearances
of
Lane Kollen
As of August 2021**

Date	Case	Jurisdic.	Party	Utility	Subject
01/01	Case No. 2000-439	KY	Kentucky Industrial Utility Customers, Inc.	Kentucky Utilities Co.	Recovery of environmental costs, surcharge mechanism.
02/01	A-110300F0095 A-110400F0040	PA	Met-Ed Industrial Users Group, Penelec Industrial Customer Alliance	GPU, Inc. FirstEnergy Corp.	Merger, savings, reliability.
03/01	P-00001860 P-00001861	PA	Met-Ed Industrial Users Group, Penelec Industrial Customer Alliance	Metropolitan Edison Co., Pennsylvania Electric Co.	Recovery of costs due to provider of last resort obligation.
04/01	U-21453, U-20925, U-22092 (Subdocket B) Settlement Term Sheet	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Business separation plan: settlement agreement on overall plan structure.
04/01	U-21453, U-20925, U-22092 (Subdocket B) Contested Issues	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Business separation plan: agreements, hold harmless conditions, separations methodology.
05/01	U-21453, U-20925, U-22092 (Subdocket B) Contested Issues Transmission and Distribution Rebuttal	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Business separation plan: agreements, hold harmless conditions, separations methodology.
07/01	U-21453, U-20925, U-22092 (Subdocket B) Transmission and Distribution Term Sheet	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Business separation plan: settlement agreement on T&D issues, agreements necessary to implement T&D separations, hold harmless conditions, separations methodology.
10/01	14000-U	GA	Georgia Public Service Commission Adversary Staff	Georgia Power Company	Revenue requirements, Rate Plan, fuel clause recovery.
11/01	14311-U Direct Panel with Bolin Killings	GA	Georgia Public Service Commission Adversary Staff	Atlanta Gas Light Co	Revenue requirements, revenue forecast, O&M expense, depreciation, plant additions, cash working capital.
11/01	U-25687 Direct	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Revenue requirements, capital structure, allocation of regulated and nonregulated costs, River Bend uprate.
02/02	PUC Docket 25230	TX	The Dallas-Fort Worth Hospital Council and the Coalition of Independent Colleges and Universities	TXU Electric	Stipulation. Regulatory assets, securitization financing.

**Expert Testimony Appearances
of
Lane Kollen
As of August 2021**

Date	Case	Jurisdiction	Party	Utility	Subject
02/02	U-25687 Surrebuttal	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Revenue requirements, corporate franchise tax, conversion to LLC, River Bend uprate.
03/02	14311-U Rebuttal Panel with Bolin Killings	GA	Georgia Public Service Commission Adversary Staff	Atlanta Gas Light Co.	Revenue requirements, earnings sharing plan, service quality standards.
03/02	14311-U Rebuttal Panel with Michelle L. Thebert	GA	Georgia Public Service Commission Adversary Staff	Atlanta Gas Light Co.	Revenue requirements, revenue forecast, O&M expense, depreciation, plant additions, cash working capital.
03/02	001148-EI	FL	South Florida Hospital and Healthcare Assoc.	Florida Power & Light Co.	Revenue requirements. Nuclear life extension, storm damage accruals and reserve, capital structure, O&M expense.
04/02	U-25687 (Suppl. Surrebuttal)	LA	Louisiana Public Service Commission	Entergy Gulf States, Inc.	Revenue requirements, corporate franchise tax, conversion to LLC, River Bend uprate.
04/02	U-21453, U-20925 U-22092 (Subdocket C)	LA	Louisiana Public Service Commission	SWEPCO	Business separation plan, T&D Term Sheet, separations methodologies, hold harmless conditions.
08/02	EL01-88-000	FERC	Louisiana Public Service Commission	Entergy Services, Inc. and the Entergy Operating Companies	System Agreement, production cost equalization, tariffs.
08/02	U-25888	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc. and Entergy Louisiana, Inc.	System Agreement, production cost disparities, prudence.
09/02	2002-00224 2002-00225	KY	Kentucky Industrial Utilities Customers, Inc.	Kentucky Utilities Co., Louisville Gas & Electric Co.	Line losses and fuel clause recovery associated with off-system sales.
11/02	2002-00146 2002-00147	KY	Kentucky Industrial Utilities Customers, Inc.	Kentucky Utilities Co., Louisville Gas & Electric Co.	Environmental compliance costs and surcharge recovery.
01/03	2002-00169	KY	Kentucky Industrial Utilities Customers, Inc.	Kentucky Power Co.	Environmental compliance costs and surcharge recovery.
04/03	2002-00429 2002-00430	KY	Kentucky Industrial Utilities Customers, Inc.	Kentucky Utilities Co., Louisville Gas & Electric Co.	Extension of merger surcredit, flaws in Companies' studies.
04/03	U-26527	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Revenue requirements, corporate franchise tax, conversion to LLC, capital structure, post-test year adjustments.
06/03	EL01-88-000 Rebuttal	FERC	Louisiana Public Service Commission	Entergy Services, Inc. and the Entergy Operating Companies	System Agreement, production cost equalization, tariffs.

**Expert Testimony Appearances
of
Lane Kollen
As of August 2021**

Date	Case	Jurisdic.	Party	Utility	Subject
06/03	2003-00068	KY	Kentucky Industrial Utility Customers	Kentucky Utilities Co.	Environmental cost recovery, correction of base rate error.
11/03	ER03-753-000	FERC	Louisiana Public Service Commission	Entergy Services, Inc. and the Entergy Operating Companies	Unit power purchases and sale cost-based tariff pursuant to System Agreement.
11/03	ER03-583-000, ER03-583-001, ER03-583-002 ER03-681-000, ER03-681-001 ER03-682-000, ER03-682-001, ER03-682-002 ER03-744-000, ER03-744-001 (Consolidated)	FERC	Louisiana Public Service Commission	Entergy Services, Inc., the Entergy Operating Companies, EWO Marketing, L.P, and Entergy Power, Inc.	Unit power purchases and sale agreements, contractual provisions, projected costs, levelized rates, and formula rates.
12/03	U-26527 Surrebuttal	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Revenue requirements, corporate franchise tax, conversion to LLC, capital structure, post-test year adjustments.
12/03	2003-0334 2003-0335	KY	Kentucky Industrial Utility Customers, Inc.	Kentucky Utilities Co., Louisville Gas & Electric Co.	Earnings Sharing Mechanism.
12/03	U-27136	LA	Louisiana Public Service Commission Staff	Entergy Louisiana, Inc.	Purchased power contracts between affiliates, terms and conditions.
03/04	U-26527 Supplemental Surrebuttal	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Revenue requirements, corporate franchise tax, conversion to LLC, capital structure, post-test year adjustments.
03/04	2003-00433	KY	Kentucky Industrial Utility Customers, Inc.	Louisville Gas & Electric Co.	Revenue requirements, depreciation rates, O&M expense, deferrals and amortization, earnings sharing mechanism, merger surcredit, VDT surcredit.
03/04	2003-00434	KY	Kentucky Industrial Utility Customers, Inc.	Kentucky Utilities Co.	Revenue requirements, depreciation rates, O&M expense, deferrals and amortization, earnings sharing mechanism, merger surcredit, VDT surcredit.
03/04	SOAH Docket 473-04-2459 PUC Docket 29206	TX	Cities Served by Texas-New Mexico Power Co.	Texas-New Mexico Power Co.	Stranded costs true-up, including valuation issues, ITC, ADIT, excess earnings.
05/04	04-169-EL-UNC	OH	Ohio Energy Group, Inc.	Columbus Southern Power Co. & Ohio Power Co.	Rate stabilization plan, deferrals, T&D rate increases, earnings.
06/04	SOAH Docket 473-04-4555 PUC Docket 29526	TX	Houston Council for Health and Education	CenterPoint Energy Houston Electric	Stranded costs true-up, including valuation issues, ITC, EDIT, excess mitigation credits, capacity auction true-up revenues, interest.

**Expert Testimony Appearances
of
Lane Kollen
As of August 2021**

Date	Case	Jurisd.ict.	Party	Utility	Subject
08/04	SOAH Docket 473-04-4555 PUC Docket 29526 (Suppl Direct)	TX	Houston Council for Health and Education	CenterPoint Energy Houston Electric	Interest on stranded cost pursuant to Texas Supreme Court remand.
09/04	U-23327 Subdocket B	LA	Louisiana Public Service Commission Staff	SWEPCO	Fuel and purchased power expenses recoverable through fuel adjustment clause, trading activities, compliance with terms of various LPSC Orders.
10/04	U-23327 Subdocket A	LA	Louisiana Public Service Commission Staff	SWEPCO	Revenue requirements.
12/04	Case Nos. 2004-00321, 2004-00372	KY	Gallatin Steel Co.	East Kentucky Power Cooperative, Inc., Big Sandy Recc, et al.	Environmental cost recovery, qualified costs, TIER requirements, cost allocation.
01/05	30485	TX	Houston Council for Health and Education	CenterPoint Energy Houston Electric, LLC	Stranded cost true-up including regulatory Central Co. assets and liabilities, ITC, EDIT, capacity auction, proceeds, excess mitigation credits, retrospective and prospective ADIT.
02/05	18638-U	GA	Georgia Public Service Commission Adversary Staff	Atlanta Gas Light Co.	Revenue requirements.
02/05	18638-U Panel with Tony Wackerly	GA	Georgia Public Service Commission Adversary Staff	Atlanta Gas Light Co.	Comprehensive rate plan, pipeline replacement program surcharge, performance based rate plan.
02/05	18638-U Panel with Michelle Thebert	GA	Georgia Public Service Commission Adversary Staff	Atlanta Gas Light Co.	Energy conservation, economic development, and tariff issues.
03/05	Case Nos. 2004-00426, 2004-00421	KY	Kentucky Industrial Utility Customers, Inc.	Kentucky Utilities Co., Louisville Gas & Electric	Environmental cost recovery, Jobs Creation Act of 2004 and §199 deduction, excess common equity ratio, deferral and amortization of nonrecurring O&M expense.
06/05	2005-00068	KY	Kentucky Industrial Utility Customers, Inc.	Kentucky Power Co.	Environmental cost recovery, Jobs Creation Act of 2004 and §199 deduction, margins on allowances used for AEP system sales.
06/05	050045-EI	FL	South Florida Hospital and Healthcare Assoc.	Florida Power & Light Co.	Storm damage expense and reserve, RTO costs, O&M expense projections, return on equity performance incentive, capital structure, selective second phase post-test year rate increase.
08/05	31056	TX	Alliance for Valley Healthcare	AEP Texas Central Co.	Stranded cost true-up including regulatory assets and liabilities, ITC, EDIT, capacity auction, proceeds, excess mitigation credits, retrospective and prospective ADIT.
09/05	20298-U	GA	Georgia Public Service Commission Adversary Staff	Atmos Energy Corp.	Revenue requirements, roll-in of surcharges, cost recovery through surcharge, reporting requirements.
09/05	20298-U	GA	Georgia Public Service	Atmos Energy Corp.	Affiliate transactions, cost allocations, capitalization,

**Expert Testimony Appearances
of
Lane Kollen
As of August 2021**

Date	Case	Jurisdct.	Party	Utility	Subject
	Panel with Victoria Taylor		Commission Adversary Staff		cost of debt.
10/05	04-42	DE	Delaware Public Service Commission Staff	Artesian Water Co.	Allocation of tax net operating losses between regulated and unregulated.
11/05	2005-00351 2005-00352	KY	Kentucky Industrial Utility Customers, Inc.	Kentucky Utilities Co., Louisville Gas & Electric	Workforce Separation Program cost recovery and shared savings through VDT surcredit.
01/06	2005-00341	KY	Kentucky Industrial Utility Customers, Inc.	Kentucky Power Co.	System Sales Clause Rider, Environmental Cost Recovery Rider, Net Congestion Rider, Storm damage, vegetation management program, depreciation, off-system sales, maintenance normalization, pension and OPEB.
03/06	PUC Docket 31994	TX	Cities	Texas-New Mexico Power Co.	Stranded cost recovery through competition transition or change.
05/06	31994 Supplemental	TX	Cities	Texas-New Mexico Power Co.	Retrospective ADFIT, prospective ADFIT.
03/06	U-21453, U-20925, U-22092 (Subdocket B)	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Jurisdictional separation plan.
03/06	NOPR Reg 104385-OR	IRS	Alliance for Valley Health Care and Houston Council for Health Education	AEP Texas Central Company and CenterPoint Energy Houston Electric	Proposed Regulations affecting flow-through to ratepayers of excess deferred income taxes and investment tax credits on generation plant that is sold or deregulated.
04/06	U-25116	LA	Louisiana Public Service Commission Staff	Entergy Louisiana, Inc.	2002-2004 Audit of Fuel Adjustment Clause Filings. Affiliate transactions.
07/06	R-00061366, Et. al.	PA	Met-Ed Ind. Users Group Pennsylvania Ind. Customer Alliance	Metropolitan Edison Co., Pennsylvania Electric Co.	Recovery of NUG-related stranded costs, government mandated program costs, storm damage costs.
07/06	U-23327	LA	Louisiana Public Service Commission Staff	Southwestern Electric Power Co.	Revenue requirements, formula rate plan, banking proposal.
08/06	U-21453, U-20925, U-22092 (Subdocket J)	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Jurisdictional separation plan.
11/06	05CVH03-3375 Franklin County Court Affidavit	OH	Various Taxing Authorities (Non-Utility Proceeding)	State of Ohio Department of Revenue	Accounting for nuclear fuel assemblies as manufactured equipment and capitalized plant.
12/06	U-23327 Subdocket A Reply Testimony	LA	Louisiana Public Service Commission Staff	Southwestern Electric Power Co.	Revenue requirements, formula rate plan, banking proposal.
03/07	U-29764	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc., Entergy Louisiana, LLC	Jurisdictional allocation of Entergy System Agreement equalization remedy receipts.

**Expert Testimony Appearances
of
Lane Kollen
As of August 2021**

Date	Case	Jurisdic.	Party	Utility	Subject
03/07	PUC Docket 33309	TX	Cities	AEP Texas Central Co.	Revenue requirements, including functionalization of transmission and distribution costs.
03/07	PUC Docket 33310	TX	Cities	AEP Texas North Co.	Revenue requirements, including functionalization of transmission and distribution costs.
03/07	2006-00472	KY	Kentucky Industrial Utility Customers, Inc.	East Kentucky Power Cooperative	Interim rate increase, RUS loan covenants, credit facility requirements, financial condition.
03/07	U-29157	LA	Louisiana Public Service Commission Staff	Cleco Power, LLC	Permanent (Phase II) storm damage cost recovery.
04/07	U-29764 Supplemental and Rebuttal	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc., Entergy Louisiana, LLC	Jurisdictional allocation of Entergy System Agreement equalization remedy receipts.
04/07	ER07-682-000 Affidavit	FERC	Louisiana Public Service Commission	Entergy Services, Inc. and the Entergy Operating Companies	Allocation of intangible and general plant and A&G expenses to production and state income tax effects on equalization remedy receipts.
04/07	ER07-684-000 Affidavit	FERC	Louisiana Public Service Commission	Entergy Services, Inc. and the Entergy Operating Companies	Fuel hedging costs and compliance with FERC USOA.
05/07	ER07-682-000 Supplemental Affidavit	FERC	Louisiana Public Service Commission	Entergy Services, Inc. and the Entergy Operating Companies	Allocation of intangible and general plant and A&G expenses to production and account 924 effects on MSS-3 equalization remedy payments and receipts.
06/07	U-29764	LA	Louisiana Public Service Commission Staff	Entergy Louisiana, LLC, Entergy Gulf States, Inc.	Show cause for violating LPSC Order on fuel hedging costs.
07/07	2006-00472	KY	Kentucky Industrial Utility Customers, Inc.	East Kentucky Power Cooperative	Revenue requirements, post-test year adjustments, TIER, surcharge revenues and costs, financial need.
07/07	ER07-956-000 Affidavit	FERC	Louisiana Public Service Commission	Entergy Services, Inc.	Storm damage costs related to Hurricanes Katrina and Rita and effects of MSS-3 equalization payments and receipts.
10/07	05-UR-103 Direct	WI	Wisconsin Industrial Energy Group	Wisconsin Electric Power Company, Wisconsin Gas, LLC	Revenue requirements, carrying charges on CWIP, amortization and return on regulatory assets, working capital, incentive compensation, use of rate base in lieu of capitalization, quantification and use of Point Beach sale proceeds.
10/07	05-UR-103 Surrebuttal	WI	Wisconsin Industrial Energy Group	Wisconsin Electric Power Company, Wisconsin Gas, LLC	Revenue requirements, carrying charges on CWIP, amortization and return on regulatory assets, working capital, incentive compensation, use of rate base in lieu of capitalization, quantification and use of Point Beach sale proceeds.
10/07	25060-U Direct	GA	Georgia Public Service Commission Public Interest Adversary Staff	Georgia Power Company	Affiliate costs, incentive compensation, consolidated income taxes, §199 deduction.

**Expert Testimony Appearances
of
Lane Kollen
As of August 2021**

Date	Case	Jurisdct.	Party	Utility	Subject
11/07	06-0033-E-CN Direct	WV	West Virginia Energy Users Group	Appalachian Power Company	IGCC surcharge during construction period and post-in-service date.
11/07	ER07-682-000 Direct	FERC	Louisiana Public Service Commission	Entergy Services, Inc. and the Entergy Operating Companies	Functionalization and allocation of intangible and general plant and A&G expenses.
01/08	ER07-682-000 Cross-Answering	FERC	Louisiana Public Service Commission	Entergy Services, Inc. and the Entergy Operating Companies	Functionalization and allocation of intangible and general plant and A&G expenses.
01/08	07-551-EL-AIR Direct	OH	Ohio Energy Group, Inc.	Ohio Edison Company, Cleveland Electric Illuminating Company, Toledo Edison Company	Revenue requirements.
02/08	ER07-956-000 Direct	FERC	Louisiana Public Service Commission	Entergy Services, Inc. and the Entergy Operating Companies	Functionalization of expenses, storm damage expense and reserves, tax NOL carrybacks in accounts, ADIT, nuclear service lives and effects on depreciation and decommissioning.
03/08	ER07-956-000 Cross-Answering	FERC	Louisiana Public Service Commission	Entergy Services, Inc. and the Entergy Operating Companies	Functionalization of expenses, storm damage expense and reserves, tax NOL carrybacks in accounts, ADIT, nuclear service lives and effects on depreciation and decommissioning.
04/08	2007-00562, 2007-00563	KY	Kentucky Industrial Utility Customers, Inc.	Kentucky Utilities Co., Louisville Gas and Electric Co.	Merger surcredit.
04/08	26837 Direct Bond, Johnson, Thebert, Kollen Panel	GA	Georgia Public Service Commission Staff	SCANA Energy Marketing, Inc.	Rule Nisi complaint.
05/08	26837 Rebuttal Bond, Johnson, Thebert, Kollen Panel	GA	Georgia Public Service Commission Staff	SCANA Energy Marketing, Inc.	Rule Nisi complaint.
05/08	26837 Suppl Rebuttal Bond, Johnson, Thebert, Kollen Panel	GA	Georgia Public Service Commission Staff	SCANA Energy Marketing, Inc.	Rule Nisi complaint.
06/08	2008-00115	KY	Kentucky Industrial Utility Customers, Inc.	East Kentucky Power Cooperative, Inc.	Environmental surcharge recoveries, including costs recovered in existing rates, TIER.

**Expert Testimony Appearances
of
Lane Kollen
As of August 2021**

Date	Case	Jurisdct.	Party	Utility	Subject
07/08	27163 Direct	GA	Georgia Public Service Commission Public Interest Advocacy Staff	Atmos Energy Corp.	Revenue requirements, including projected test year rate base and expenses.
07/08	27163 Taylor, Kollen Panel	GA	Georgia Public Service Commission Public Interest Advocacy Staff	Atmos Energy Corp.	Affiliate transactions and division cost allocations, capital structure, cost of debt.
08/08	6680-CE-170 Direct	WI	Wisconsin Industrial Energy Group, Inc.	Wisconsin Power and Light Company	Nelson Dewey 3 or Colombia 3 fixed financial parameters.
08/08	6680-UR-116 Direct	WI	Wisconsin Industrial Energy Group, Inc.	Wisconsin Power and Light Company	CWIP in rate base, labor expenses, pension expense, financing, capital structure, decoupling.
08/08	6680-UR-116 Rebuttal	WI	Wisconsin Industrial Energy Group, Inc.	Wisconsin Power and Light Company	Capital structure.
08/08	6690-UR-119 Direct	WI	Wisconsin Industrial Energy Group, Inc.	Wisconsin Public Service Corp.	Prudence of Weston 3 outage, incentive compensation, Crane Creek Wind Farm incremental revenue requirement, capital structure.
09/08	6690-UR-119 Surrebuttal	WI	Wisconsin Industrial Energy Group, Inc.	Wisconsin Public Service Corp.	Prudence of Weston 3 outage, Section 199 deduction.
09/08	08-935-EL-SSO, 08-918-EL-SSO	OH	Ohio Energy Group, Inc.	First Energy	Standard service offer rates pursuant to electric security plan, significantly excessive earnings test.
10/08	08-917-EL-SSO	OH	Ohio Energy Group, Inc.	AEP	Standard service offer rates pursuant to electric security plan, significantly excessive earnings test.
10/08	2007-00564, 2007-00565, 2008-00251 2008-00252	KY	Kentucky Industrial Utility Customers, Inc.	Louisville Gas and Electric Co., Kentucky Utilities Company	Revenue forecast, affiliate costs, ELG v ASL depreciation procedures, depreciation expenses, federal and state income tax expense, capitalization, cost of debt.
11/08	EL08-51	FERC	Louisiana Public Service Commission	Entergy Services, Inc.	Spindletop gas storage facilities, regulatory asset and bandwidth remedy.
11/08	35717	TX	Cities Served by Oncor Delivery Company	Oncor Delivery Company	Recovery of old meter costs, asset ADFIT, cash working capital, recovery of prior year restructuring costs, levelized recovery of storm damage costs, prospective storm damage accrual, consolidated tax savings adjustment.
12/08	27800	GA	Georgia Public Service Commission	Georgia Power Company	AFUDC versus CWIP in rate base, mirror CWIP, certification cost, use of short term debt and trust preferred financing, CWIP recovery, regulatory incentive.
01/09	ER08-1056	FERC	Louisiana Public Service Commission	Entergy Services, Inc.	Entergy System Agreement bandwidth remedy calculations, including depreciation expense, ADIT, capital structure.
01/09	ER08-1056 Supplemental Direct	FERC	Louisiana Public Service Commission	Entergy Services, Inc.	Blytheville leased turbines; accumulated depreciation.

**Expert Testimony Appearances
of
Lane Kollen
As of August 2021**

Date	Case	Jurisdic.	Party	Utility	Subject
02/09	EL08-51 Rebuttal	FERC	Louisiana Public Service Commission	Entergy Services, Inc.	Spindletop gas storage facilities regulatory asset and bandwidth remedy.
02/09	2008-00409 Direct	KY	Kentucky Industrial Utility Customers, Inc.	East Kentucky Power Cooperative, Inc.	Revenue requirements.
03/09	ER08-1056 Answering	FERC	Louisiana Public Service Commission	Entergy Services, Inc.	Entergy System Agreement bandwidth remedy calculations, including depreciation expense, ADIT, capital structure.
03/09	U-21453, U-20925 U-22092 (Sub J) Direct	LA	Louisiana Public Service Commission Staff	Entergy Gulf States Louisiana, LLC	Violation of EGSI separation order, ETI and EGSL separation accounting, Spindletop regulatory asset.
04/09	Rebuttal				
04/09	2009-00040 Direct-Interim (Oral)	KY	Kentucky Industrial Utility Customers, Inc.	Big Rivers Electric Corp.	Emergency interim rate increase; cash requirements.
04/09	PUC Docket 36530	TX	State Office of Administrative Hearings	Oncor Electric Delivery Company, LLC	Rate case expenses.
05/09	ER08-1056 Rebuttal	FERC	Louisiana Public Service Commission	Entergy Services, Inc.	Entergy System Agreement bandwidth remedy calculations, including depreciation expense, ADIT, capital structure.
06/09	2009-00040 Direct- Permanent	KY	Kentucky Industrial Utility Customers, Inc.	Big Rivers Electric Corp.	Revenue requirements, TIER, cash flow.
07/09	080677-EI	FL	South Florida Hospital and Healthcare Association	Florida Power & Light Company	Multiple test years, GBRA rider, forecast assumptions, revenue requirement, O&M expense, depreciation expense, Economic Stimulus Bill, capital structure.
08/09	U-21453, U- 20925, U-22092 (Subdocket J) Supplemental Rebuttal	LA	Louisiana Public Service Commission	Entergy Gulf States Louisiana, LLC	Violation of EGSI separation order, ETI and EGSL separation accounting, Spindletop regulatory asset.
08/09	8516 and 29950	GA	Georgia Public Service Commission Staff	Atlanta Gas Light Company	Modification of PRP surcharge to include infrastructure costs.
09/09	05-UR-104 Direct and Surrebuttal	WI	Wisconsin Industrial Energy Group	Wisconsin Electric Power Company	Revenue requirements, incentive compensation, depreciation, deferral mitigation, capital structure, cost of debt.
09/09	09AL-299E Answer	CO	CF&I Steel, Rocky Mountain Steel Mills LP, Climax Molybdenum Company	Public Service Company of Colorado	Forecasted test year, historic test year, proforma adjustments for major plant additions, tax depreciation.

**Expert Testimony Appearances
of
Lane Kollen
As of August 2021**

Date	Case	Jurisdic.	Party	Utility	Subject
09/09	6680-UR-117 Direct and Surrebuttal	WI	Wisconsin Industrial Energy Group	Wisconsin Power and Light Company	Revenue requirements, CWIP in rate base, deferral mitigation, payroll, capacity shutdowns, regulatory assets, rate of return.
10/09	09A-415E Answer	CO	Cripple Creek & Victor Gold Mining Company, et al.	Black Hills/CO Electric Utility Company	Cost prudence, cost sharing mechanism.
10/09	EL09-50 Direct	FERC	Louisiana Public Service Commission	Entergy Services, Inc.	Waterford 3 sale/leaseback accumulated deferred income taxes, Entergy System Agreement bandwidth remedy calculations.
10/09	2009-00329	KY	Kentucky Industrial Utility Customers, Inc.	Louisville Gas and Electric Company, Kentucky Utilities Company	Trimble County 2 depreciation rates.
12/09	PUE-2009-00030	VA	Old Dominion Committee for Fair Utility Rates	Appalachian Power Company	Return on equity incentive.
12/09	ER09-1224 Direct	FERC	Louisiana Public Service Commission	Entergy Services, Inc.	Hypothetical versus actual costs, out of period costs, Spindletop deferred capital costs, Waterford 3 sale/leaseback ADIT.
01/10	ER09-1224 Cross-Answering	FERC	Louisiana Public Service Commission	Entergy Services, Inc.	Hypothetical versus actual costs, out of period costs, Spindletop deferred capital costs, Waterford 3 sale/leaseback ADIT.
01/10	EL09-50 Rebuttal Supplemental Rebuttal	FERC	Louisiana Public Service Commission	Entergy Services, Inc.	Waterford 3 sale/leaseback accumulated deferred income taxes, Entergy System Agreement bandwidth remedy calculations.
02/10	ER09-1224 Final	FERC	Louisiana Public Service Commission	Entergy Services, Inc.	Hypothetical versus actual costs, out of period costs, Spindletop deferred capital costs, Waterford 3 sale/leaseback ADIT.
02/10	30442 Wackerly-Kollen Panel	GA	Georgia Public Service Commission Staff	Atmos Energy Corporation	Revenue requirement issues.
02/10	30442 McBride-Kollen Panel	GA	Georgia Public Service Commission Staff	Atmos Energy Corporation	Affiliate/division transactions, cost allocation, capital structure.
02/10	2009-00353	KY	Kentucky Industrial Utility Customers, Inc., Attorney General	Louisville Gas and Electric Company, Kentucky Utilities Company	Ratemaking recovery of wind power purchased power agreements.
03/10	2009-00545	KY	Kentucky Industrial Utility Customers, Inc.	Kentucky Power Company	Ratemaking recovery of wind power purchased power agreement.
03/10	E015/GR-09-1151	MN	Large Power Interveners	Minnesota Power	Revenue requirement issues, cost overruns on environmental retrofit project.

**Expert Testimony Appearances
of
Lane Kollen
As of August 2021**

Date	Case	Jurisdic.	Party	Utility	Subject
04/10	2009-00459	KY	Kentucky Industrial Utility Customers, Inc.	Kentucky Power Company	Revenue requirement issues.
04/10	2009-00548, 2009-00549	KY	Kentucky Industrial Utility Customers, Inc.	Kentucky Utilities Company, Louisville Gas and Electric Company	Revenue requirement issues.
08/10	31647	GA	Georgia Public Service Commission Staff	Atlanta Gas Light Company	Revenue requirement and synergy savings issues.
08/10	31647 Wackerly-Kollen Panel	GA	Georgia Public Service Commission Staff	Atlanta Gas Light Company	Affiliate transaction and Customer First program issues.
08/10	2010-00204	KY	Kentucky Industrial Utility Customers, Inc.	Louisville Gas and Electric Company, Kentucky Utilities Company	PPL acquisition of E.ON U.S. (LG&E and KU) conditions, acquisition savings, sharing deferral mechanism.
09/10	38339 Direct and Cross-Rebuttal	TX	Gulf Coast Coalition of Cities	CenterPoint Energy Houston Electric	Revenue requirement issues, including consolidated tax savings adjustment, incentive compensation FIN 48; AMS surcharge including roll-in to base rates; rate case expenses.
09/10	EL10-55	FERC	Louisiana Public Service Commission	Entergy Services, Inc., Entergy Operating Cos	Depreciation rates and expense input effects on System Agreement tariffs.
09/10	2010-00167	KY	Gallatin Steel	East Kentucky Power Cooperative, Inc.	Revenue requirements.
09/10	U-23327 Subdocket E Direct	LA	Louisiana Public Service Commission	SWEPCO	Fuel audit: S02 allowance expense, variable O&M expense, off-system sales margin sharing.
11/10	U-23327 Rebuttal	LA	Louisiana Public Service Commission	SWEPCO	Fuel audit: S02 allowance expense, variable O&M expense, off-system sales margin sharing.
09/10	U-31351	LA	Louisiana Public Service Commission Staff	SWEPCO and Valley Electric Membership Cooperative	Sale of Valley assets to SWEPCO and dissolution of Valley.
10/10	10-1261-EL-UNC	OH	Ohio OCC, Ohio Manufacturers Association, Ohio Energy Group, Ohio Hospital Association, Appalachian Peace and Justice Network	Columbus Southern Power Company	Significantly excessive earnings test.
10/10	10-0713-E-PC	WV	West Virginia Energy Users Group	Monongahela Power Company, Potomac Edison Power Company	Merger of First Energy and Allegheny Energy.

**Expert Testimony Appearances
of
Lane Kollen
As of August 2021**

Date	Case	Jurisdic.	Party	Utility	Subject
10/10	U-23327 Subdocket F Direct	LA	Louisiana Public Service Commission Staff	SWEPCO	AFUDC adjustments in Formula Rate Plan.
11/10	EL10-55 Rebuttal	FERC	Louisiana Public Service Commission	Entergy Services, Inc., Entergy Operating Cos	Depreciation rates and expense input effects on System Agreement tariffs.
12/10	ER10-1350 Direct	FERC	Louisiana Public Service Commission	Entergy Services, Inc. Entergy Operating Cos	Waterford 3 lease amortization, ADIT, and fuel inventory effects on System Agreement tariffs.
01/11	ER10-1350 Cross-Answering	FERC	Louisiana Public Service Commission	Entergy Services, Inc., Entergy Operating Cos	Waterford 3 lease amortization, ADIT, and fuel inventory effects on System Agreement tariffs.
03/11	ER10-2001 Direct	FERC	Louisiana Public Service Commission	Entergy Services, Inc., Entergy Arkansas, Inc.	EAI depreciation rates.
04/11	Cross-Answering				
04/11	U-23327 Subdocket E	LA	Louisiana Public Service Commission Staff	SWEPCO	Settlement, incl resolution of SO2 allowance expense, var O&M expense, sharing of OSS margins.
04/11	38306 Direct	TX	Cities Served by Texas- New Mexico Power Company	Texas-New Mexico Power Company	AMS deployment plan, AMS Surcharge, rate case expenses.
05/11	Suppl Direct				
05/11	11-0274-E-GI	WV	West Virginia Energy Users Group	Appalachian Power Company, Wheeling Power Company	Deferral recovery phase-in, construction surcharge.
05/11	2011-00036	KY	Kentucky Industrial Utility Customers, Inc.	Big Rivers Electric Corp.	Revenue requirements.
06/11	29849	GA	Georgia Public Service Commission Staff	Georgia Power Company	Accounting issues related to Vogtle risk-sharing mechanism.
07/11	ER11-2161 Direct and Answering	FERC	Louisiana Public Service Commission	Entergy Services, Inc. and Entergy Texas, Inc.	ETI depreciation rates; accounting issues.
07/11	PUE-2011-00027	VA	Virginia Committee for Fair Utility Rates	Virginia Electric and Power Company	Return on equity performance incentive.
07/11	11-346-EL-SSO 11-348-EL-SSO 11-349-EL-AAM 11-350-EL-AAM	OH	Ohio Energy Group	AEP-OH	Equity Stabilization Incentive Plan; actual earned returns; ADIT offsets in riders.
08/11	U-23327 Subdocket F Rebuttal	LA	Louisiana Public Service Commission Staff	SWEPCO	Depreciation rates and service lives; AFUDC adjustments.
08/11	05-UR-105	WI	Wisconsin Industrial Energy Group	WE Energies, Inc.	Suspended amortization expenses; revenue requirements.

**Expert Testimony Appearances
of
Lane Kollen
As of August 2021**

Date	Case	Jurisdic.	Party	Utility	Subject
08/11	ER11-2161 Cross-Answering	FERC	Louisiana Public Service Commission	Entergy Services, Inc. and Entergy Texas, Inc.	ETI depreciation rates; accounting issues.
09/11	PUC Docket 39504	TX	Gulf Coast Coalition of Cities	CenterPoint Energy Houston Electric	Investment tax credit, excess deferred income taxes; normalization.
09/11	2011-00161 2011-00162	KY	Kentucky Industrial Utility Consumers, Inc.	Louisville Gas & Electric Company, Kentucky Utilities Company	Environmental requirements and financing.
10/11	11-4571-EL-UNC 11-4572-EL-UNC	OH	Ohio Energy Group	Columbus Southern Power Company, Ohio Power Company	Significantly excessive earnings.
10/11	4220-UR-117 Direct	WI	Wisconsin Industrial Energy Group	Northern States Power-Wisconsin	Nuclear O&M, depreciation.
11/11	4220-UR-117 Surrebuttal	WI	Wisconsin Industrial Energy Group	Northern States Power-Wisconsin	Nuclear O&M, depreciation.
11/11	PUC Docket 39722	TX	Cities Served by AEP Texas Central Company	AEP Texas Central Company	Investment tax credit, excess deferred income taxes; normalization.
02/12	PUC Docket 40020	TX	Cities Served by Oncor	Lone Star Transmission, LLC	Temporary rates.
03/12	11AL-947E Answer	CO	Climax Molybdenum Company and CF&I Steel, L.P. d/b/a Evraz Rocky Mountain Steel	Public Service Company of Colorado	Revenue requirements, including historic test year, future test year, CACJA CWIP, contra-AFUDC.
03/12	2011-00401	KY	Kentucky Industrial Utility Customers, Inc.	Kentucky Power Company	Big Sandy 2 environmental retrofits and environmental surcharge recovery.
4/12	2011-00036 Direct Rehearing Supplemental Rebuttal Rehearing	KY	Kentucky Industrial Utility Customers, Inc.	Big Rivers Electric Corp.	Rate case expenses, depreciation rates and expense.
04/12	10-2929-EL-UNC	OH	Ohio Energy Group	AEP Ohio Power	State compensation mechanism, CRES capacity charges, Equity Stabilization Mechanism
05/12	11-346-EL-SSO 11-348-EL-SSO	OH	Ohio Energy Group	AEP Ohio Power	State compensation mechanism, Equity Stabilization Mechanism, Retail Stability Rider.
05/12	11-4393-EL-RDR	OH	Ohio Energy Group	Duke Energy Ohio, Inc.	Incentives for over-compliance on EE/PDR mandates.

**Expert Testimony Appearances
of
Lane Kollen
As of August 2021**

Date	Case	Jurisdic.	Party	Utility	Subject
06/12	40020	TX	Cities Served by Oncor	Lone Star Transmission, LLC	Revenue requirements, including ADIT, bonus depreciation and NOL, working capital, self insurance, depreciation rates, federal income tax expense.
07/12	120015-EI	FL	South Florida Hospital and Healthcare Association	Florida Power & Light Company	Revenue requirements, including vegetation management, nuclear outage expense, cash working capital, CWIP in rate base.
07/12	2012-00063	KY	Kentucky Industrial Utility Customers, Inc.	Big Rivers Electric Corp.	Environmental retrofits, including environmental surcharge recovery.
09/12	05-UR-106	WI	Wisconsin Industrial Energy Group, Inc.	Wisconsin Electric Power Company	Section 1603 grants, new solar facility, payroll expenses, cost of debt.
10/12	2012-00221 2012-00222	KY	Kentucky Industrial Utility Customers, Inc.	Louisville Gas and Electric Company, Kentucky Utilities Company	Revenue requirements, including off-system sales, outage maintenance, storm damage, injuries and damages, depreciation rates and expense.
10/12	120015-EI Direct	FL	South Florida Hospital and Healthcare Association	Florida Power & Light Company	Settlement issues.
11/12	120015-EI Rebuttal	FL	South Florida Hospital and Healthcare Association	Florida Power & Light Company	Settlement issues.
10/12	40604	TX	Steering Committee of Cities Served by Oncor	Cross Texas Transmission, LLC	Policy and procedural issues, revenue requirements, including AFUDC, ADIT – bonus depreciation & NOL, incentive compensation, staffing, self-insurance, net salvage, depreciation rates and expense, income tax expense.
11/12	40627 Direct	TX	City of Austin d/b/a Austin Energy	City of Austin d/b/a Austin Energy	Rate case expenses.
12/12	40443	TX	Cities Served by SWEPCO	Southwestern Electric Power Company	Revenue requirements, including depreciation rates and service lives, O&M expenses, consolidated tax savings, CWIP in rate base, Turk plant costs.
12/12	U-29764	LA	Louisiana Public Service Commission Staff	Entergy Gulf States Louisiana, LLC and Entergy Louisiana, LLC	Termination of purchased power contracts between EGSL and ETI, Spindletop regulatory asset.
01/13	ER12-1384 Rebuttal	FERC	Louisiana Public Service Commission	Entergy Gulf States Louisiana, LLC and Entergy Louisiana, LLC	Little Gypsy 3 cancellation costs.
02/13	40627 Rebuttal	TX	City of Austin d/b/a Austin Energy	City of Austin d/b/a Austin Energy	Rate case expenses.
03/13	12-426-EL-SSO	OH	The Ohio Energy Group	The Dayton Power and Light Company	Capacity charges under state compensation mechanism, Service Stability Rider, Switching Tracker.

**Expert Testimony Appearances
of
Lane Kollen
As of August 2021**

Date	Case	Jurisdct.	Party	Utility	Subject
04/13	12-2400-EL-UNC	OH	The Ohio Energy Group	Duke Energy Ohio, Inc.	Capacity charges under state compensation mechanism, deferrals, rider to recover deferrals.
04/13	2012-00578	KY	Kentucky Industrial Utility Customers, Inc.	Kentucky Power Company	Resource plan, including acquisition of interest in Mitchell plant.
05/13	2012-00535	KY	Kentucky Industrial Utility Customers, Inc.	Big Rivers Electric Corporation	Revenue requirements, excess capacity, restructuring.
06/13	12-3254-EL-UNC	OH	The Ohio Energy Group, Inc., Office of the Ohio Consumers' Counsel	Ohio Power Company	Energy auctions under CBP, including reserve prices.
07/13	2013-00144	KY	Kentucky Industrial Utility Customers, Inc.	Kentucky Power Company	Biomass renewable energy purchase agreement.
07/13	2013-00221	KY	Kentucky Industrial Utility Customers, Inc.	Big Rivers Electric Corporation	Agreements to provide Century Hawesville Smelter market access.
10/13	2013-00199	KY	Kentucky Industrial Utility Customers, Inc.	Big Rivers Electric Corporation	Revenue requirements, excess capacity, restructuring.
12/13	2013-00413	KY	Kentucky Industrial Utility Customers, Inc.	Big Rivers Electric Corporation	Agreements to provide Century Sebree Smelter market access.
01/14	ER10-1350 Direct and Answering	FERC	Louisiana Public Service Commission	Entergy Services, Inc.	Waterford 3 lease accounting and treatment in annual bandwidth filings.
02/14	U-32981	LA	Louisiana Public Service Commission	Entergy Louisiana, LLC	Montauk renewable energy PPA.
04/14	ER13-432 Direct	FERC	Louisiana Public Service Commission	Entergy Gulf States Louisiana, LLC and Entergy Louisiana, LLC	UP Settlement benefits and damages.
05/14	PUE-2013-00132	VA	HP Hood LLC	Shenandoah Valley Electric Cooperative	Market based rate; load control tariffs.
07/14	PUE-2014-00033	VA	Virginia Committee for Fair Utility Rates	Virginia Electric and Power Company	Fuel and purchased power hedge accounting, change in FAC Definitional Framework.
08/14	ER13-432 Rebuttal	FERC	Louisiana Public Service Commission	Entergy Gulf States Louisiana, LLC and Entergy Louisiana, LLC	UP Settlement benefits and damages.
08/14	2014-00134	KY	Kentucky Industrial Utility Customers, Inc.	Big Rivers Electric Corporation	Requirements power sales agreements with Nebraska entities.
09/14	E-015/CN-12-1163 Direct	MN	Large Power Intervenors	Minnesota Power	Great Northern Transmission Line; cost cap; AFUDC v. current recovery; rider v. base recovery; class cost allocation.
10/14	2014-00225	KY	Kentucky Industrial Utility Customers, Inc.	Kentucky Power Company	Allocation of fuel costs to off-system sales.

**Expert Testimony Appearances
of
Lane Kollen
As of August 2021**

Date	Case	Jurisdic.	Party	Utility	Subject
10/14	ER13-1508	FERC	Louisiana Public Service Commission	Entergy Services, Inc.	Entergy service agreements and tariffs for affiliate power purchases and sales; return on equity.
10/14	14-0702-E-42T 14-0701-E-D	WV	West Virginia Energy Users Group	First Energy-Monongahela Power, Potomac Edison	Consolidated tax savings; payroll; pension, OPEB, amortization; depreciation; environmental surcharge.
11/14	E-015/CN-12-1163 Surrebuttal	MN	Large Power Intervenors	Minnesota Power	Great Northern Transmission Line; cost cap; AFUDC v. current recovery; rider v. base recovery; class allocation.
11/14	05-376-EL-UNC	OH	Ohio Energy Group	Ohio Power Company	Refund of IGCC CWIP financing cost recoveries.
11/14	14AL-0660E	CO	Climax, CF&I Steel	Public Service Company of Colorado	Historic test year v. future test year; AFUDC v. current return; CACJA rider, transmission rider, equivalent availability rider; ADIT; depreciation; royalty income; amortization.
12/14	EL14-026	SD	Black Hills Industrial Intervenors	Black Hills Power Company	Revenue requirement issues, including depreciation expense and affiliate charges.
12/14	14-1152-E-42T	WV	West Virginia Energy Users Group	AEP-Appalachian Power Company	Income taxes, payroll, pension, OPEB, deferred costs and write offs, depreciation rates, environmental projects surcharge.
01/15	9400-YO-100 Direct	WI	Wisconsin Industrial Energy Group	Wisconsin Energy Corporation	WEC acquisition of Integrys Energy Group, Inc.
01/15	14F-0336EG 14F-0404EG	CO	Development Recovery Company LLC	Public Service Company of Colorado	Line extension policies and refunds.
02/15	9400-YO-100 Rebuttal	WI	Wisconsin Industrial Energy Group	Wisconsin Energy Corporation	WEC acquisition of Integrys Energy Group, Inc.
03/15	2014-00396	KY	Kentucky Industrial Utility Customers, Inc.	AEP-Kentucky Power Company	Base, Big Sandy 2 retirement rider, environmental surcharge, and Big Sandy 1 operation rider revenue requirements, depreciation rates, financing, deferrals.
03/15	2014-00371 2014-00372	KY	Kentucky Industrial Utility Customers, Inc.	Kentucky Utilities Company and Louisville Gas and Electric Company	Revenue requirements, staffing and payroll, depreciation rates.
04/15	2014-00450	KY	Kentucky Industrial Utility Customers, Inc. and the Attorney General of the Commonwealth of Kentucky	AEP-Kentucky Power Company	Allocation of fuel costs between native load and off-system sales.
04/15	2014-00455	KY	Kentucky Industrial Utility Customers, Inc. and the Attorney General of the Commonwealth of Kentucky	Big Rivers Electric Corporation	Allocation of fuel costs between native load and off-system sales.

**Expert Testimony Appearances
of
Lane Kollen
As of August 2021**

Date	Case	Jurisdic.	Party	Utility	Subject
04/15	ER2014-0370	MO	Midwest Energy Consumers' Group	Kansas City Power & Light Company	Affiliate transactions, operation and maintenance expense, management audit.
05/15	PUE-2015-00022	VA	Virginia Committee for Fair Utility Rates	Virginia Electric and Power Company	Fuel and purchased power hedge accounting; change in FAC Definitional Framework.
05/15 09/15	EL10-65 Direct, Rebuttal Complaint	FERC	Louisiana Public Service Commission	Entergy Services, Inc.	Accounting for AFUDC Debt, related ADIT.
07/15	EL10-65 Direct and Answering Consolidated Bandwidth Dockets	FERC	Louisiana Public Service Commission	Entergy Services, Inc.	Waterford 3 sale/leaseback ADIT, Bandwidth Formula.
09/15	14-1693-EL-RDR	OH	Public Utilities Commission of Ohio	Ohio Energy Group	PPA rider for charges or credits for physical hedges against market.
12/15	45188	TX	Cities Served by Oncor Electric Delivery Company	Oncor Electric Delivery Company	Hunt family acquisition of Oncor; transaction structure; income tax savings from real estate investment trust (REIT) structure; conditions.
12/15 01/16	6680-CE-176 Direct, Surrebuttal, Supplemental Rebuttal	WI	Wisconsin Industrial Energy Group, Inc.	Wisconsin Power and Light Company	Need for capacity and economics of proposed Riverside Energy Center Expansion project; ratemaking conditions.
03/16 03/16 04/16 05/16 06/16	EL01-88 Remand Direct Answering Cross-Answering Rebuttal	FERC	Louisiana Public Service Commission	Entergy Services, Inc.	Bandwidth Formula: Capital structure, fuel inventory, Waterford 3 sale/leaseback, Vidalia purchased power, ADIT, Blythesville, Spindletop, River Bend AFUDC, property insurance reserve, nuclear depreciation expense.
03/16	15-1673-E-T	WV	West Virginia Energy Users Group	Appalachian Power Company	Terms and conditions of utility service for commercial and industrial customers, including security deposits.
04/16	39971 Panel Direct	GA	Georgia Public Service Commission Staff	Southern Company, AGL Resources, Georgia Power Company, Atlanta Gas Light Company	Southern Company acquisition of AGL Resources, risks, opportunities, quantification of savings, ratemaking implications, conditions, settlement.
04/16	2015-00343	KY	Office of the Attorney General	Atmos Energy Corporation	Revenue requirements, including NOL ADIT, affiliate transactions.
04/16	2016-00070	KY	Office of the Attorney General	Atmos Energy Corporation	R & D Rider.

**Expert Testimony Appearances
of
Lane Kollen
As of August 2021**

Date	Case	Jurisdic.	Party	Utility	Subject
05/16	2016-00026 2016-00027	KY	Kentucky Industrial Utility Customers, Inc.	Kentucky Utilities Co., Louisville Gas & Electric Co.	Need for environmental projects, calculation of environmental surcharge rider.
05/16	16-G-0058 16-G-0059	NY	New York City	Keyspan Gas East Corp., Brooklyn Union Gas Company	Depreciation, including excess reserves, leak prone pipe.
06/16	160088-EI	FL	South Florida Hospital and Healthcare Association	Florida Power and Light Company	Fuel Adjustment Clause Incentive Mechanism re: economy sales and purchases, asset optimization.
07/16	160021-EI	FL	South Florida Hospital and Healthcare Association	Florida Power and Light Company	Revenue requirements, including capital recovery, depreciation, ADIT.
07/16	16-057-01	UT	Office of Consumer Services	Dominion Resources, Inc. / Questar Corporation	Merger, risks, harms, benefits, accounting.
08/16	15-1022-EL-UNC 16-1105-EL-UNC	OH	Ohio Energy Group	AEP Ohio Power Company	SEET earnings, effects of other pending proceedings.
9/16	2016-00162	KY	Office of the Attorney General	Columbia Gas Kentucky	Revenue requirements, O&M expense, depreciation, affiliate transactions.
09/16	E-22 Sub 519, 532, 533	NC	Nucor Steel	Dominion North Carolina Power Company	Revenue requirements, deferrals and amortizations.
09/16	15-1256-G-390P (Reopened) 16-0922-G-390P	WV	West Virginia Energy Users Group	Mountaineer Gas Company	Infrastructure rider, including NOL ADIT and other income tax normalization and calculation issues.
10/16	10-2929-EL-UNC 11-346-EL-SSO 11-348-EL-SSO 11-349-EL-SSO 11-350-EL-SSO 14-1186-EL-RDR	OH	Ohio Energy Group	AEP Ohio Power Company	State compensation mechanism, capacity cost, Retail Stability Rider deferrals, refunds, SEET.
11/16	16-0395-EL-SSO Direct	OH	Ohio Energy Group	Dayton Power & Light Company	Credit support and other riders; financial stability of Utility, holding company.
12/16	Formal Case 1139	DC	Healthcare Council of the National Capital Area	Potomac Electric Power Company	Post test year adjust, merger costs, NOL ADIT, incentive compensation, rent.
01/17	46238	TX	Steering Committee of Cities Served by Oncor	Oncor Electric Delivery Company	Next Era acquisition of Oncor; goodwill, transaction costs, transition costs, cost deferrals, ratemaking issues.
02/17	16-0395-EL-SSO Direct (Stipulation)	OH	Ohio Energy Group	Dayton Power & Light Company	Non-unanimous stipulation re: credit support and other riders; financial stability of utility, holding company.
02/17	45414	TX	Cities of Midland, McAllen, and Colorado City	Sharyland Utilities, LP, Sharyland Distribution & Transmission Services, LLC	Income taxes, depreciation, deferred costs, affiliate expenses.

**Expert Testimony Appearances
of
Lane Kollen
As of August 2021**

Date	Case	Jurisdic.	Party	Utility	Subject
03/17	2016-00370 2016-00371	KY	Kentucky Industrial Utility Customers, Inc.	Kentucky Utilities Company, Louisville Gas and Electric Company	AMS, capital expenditures, maintenance expense, amortization expense, depreciation rates and expense.
06/17	29849 (Panel with Philip Hayet)	GA	Georgia Public Service Commission Staff	Georgia Power Company	Vogtle 3 and 4 economics.
08/17	17-0296-E-PC	WV	West Virginia Energy Users Group	Monongahela Power Company, The Potomac Edison Power Company	ADIT, OPEB.
10/17	2017-00179	KY	Kentucky Industrial Utility Customers, Inc.	Kentucky Power Company	Weather normalization, Rockport lease, O&M, incentive compensation, depreciation, income taxes.
10/17	2017-00287	KY	Kentucky Industrial Utility Customers, Inc.	Big Rivers Electric Corporation	Fuel cost allocation to native load customers.
12/17	2017-00321	KY	Attorney General	Duke Energy Kentucky (Electric)	Revenues, depreciation, income taxes, O&M, regulatory assets, environmental surcharge rider, FERC transmission cost reconciliation rider.
12/17	29849 (Panel with Philip Hayet, Tom Newsome)	GA	Georgia Public Service Commission Staff	Georgia Power Company	Vogtle 3 and 4 economics, tax abandonment loss.
01/18	2017-00349	KY	Kentucky Attorney General	Atmos Energy Kentucky	O&M expense, depreciation, regulatory assets and amortization, Annual Review Mechanism, Pipeline Replacement Program and Rider, affiliate expenses.
06/18	18-0047	OH	Ohio Energy Group	Ohio Electric Utilities	Tax Cuts and Jobs Act. Reduction in income tax expense; amortization of excess ADIT.
07/18	T-34695	LA	LPSC Staff	Crimson Gulf, LLC	Revenues, depreciation, income taxes, O&M, ADIT.
08/18	48325	TX	Cities Served by Oncor	Oncor Electric Delivery Company	Tax Cuts and Jobs Act; amortization of excess ADIT.
08/18	48401	TX	Cities Served by TNMP	Texas-New Mexico Power Company	Revenues, payroll, income taxes, amortization of excess ADIT, capital structure.
08/18	2018-00146	KY	KIUC	Big Rivers Electric Corporation	Station Two contracts termination, regulatory asset, regulatory liability for savings
09/18	20170235-EI 20170236-EU	FL	Office of Public Counsel	Florida Power & Light Company	FP&L acquisition of City of Vero Beach municipal electric utility systems.
10/18	Direct Supplemental Direct				

**Expert Testimony Appearances
of
Lane Kollen
As of August 2021**

Date	Case	Jurisdic.	Party	Utility	Subject
09/18	2017-370-E Direct	SC	Office of Regulatory Staff	South Carolina Electric & Gas Company and Dominion Energy, Inc.	Recovery of Summer 2 and 3 new nuclear development costs, related regulatory liabilities, securitization, NOL carryforward and ADIT, TCJA savings, merger conditions and savings.
10/18	2017-207, 305, 370-E Surrebuttal Supplemental Surrebuttal				
12/18	2018-00261	KY	Attorney General	Duke Energy Kentucky (Gas)	Revenues, O&M, regulatory assets, payroll, integrity management, incentive compensation, cash working capital.
01/19	2018-00294 2018-00295	KY	Kentucky Industrial Utility Customers, Inc.	Kentucky Utilities Company, Louisville Gas & Electric Company	AFUDC v. CWIP in rate base, transmission and distribution plant additions, capitalization, revenues generation outage expense, depreciation rates and expenses, cost of debt.
01/19	2018-00281	KY	Attorney General	Atmos Energy Corp.	AFUDC v. CWIP in rate base, ALG v. ELG depreciation rates, cash working capital, PRP Rider, forecast plant additions, forecast expenses, cost of debt, corporate cost allocation.
02/19	UD-18-17 Direct	New Orleans	Crescent City Power Users Group	Entergy New Orleans, LLC	Post-test year adjustments, storm reserve fund, NOL ADIT, FIN48 ADIT, cash working capital, depreciation, amortization, capital structure, formula rate plans, purchased power rider.
04/19	Surrebuttal and Cross-Answering				
03/19	2018-0358	KY	Attorney General	Kentucky American Water Company	Capital expenditures, cash working capital, payroll expense, incentive compensation, chemicals expense, electricity expense, water losses, rate case expense, excess deferred income taxes.
03/19	48929	TX	Steering Committee of Cities Served by Oncor	Oncor Electric Delivery Company LLC, Sempra Energy, Sharyland Distribution & Transmission Services, L.L.C., Sharyland Utilities, L.P.	Sale, transfer, merger transactions, hold harmless and other regulatory conditions.
06/19	49421	TX	Gulf Coast Coalition of Cities	CenterPoint Energy Houston Electric	Prepaid pension asset, accrued OPEB liability, regulatory assets and liabilities, merger savings, storm damage expense, excess deferred income taxes.
07/19	49494	TX	Cities Served by AEP Texas	AEP Texas, Inc.	Plant in service, prepaid pension asset, O&M, ROW costs, incentive compensation, self-insurance expense, excess deferred income taxes.
08/19	19-G-0309 19-G-0310	NY	New York City	National Grid	Depreciation rates, net negative salvage.

**Expert Testimony Appearances
of
Lane Kollen
As of August 2021**

Date	Case	Jurisdct.	Party	Utility	Subject
10/19	42315	GA	Atlanta Gas Light Company	Public Interest Advocacy Staff	Capital expenditures, O&M expense, prepaid pension asset, incentive compensation, merger savings, affiliate expenses, excess deferred income taxes.
10/19	45253	IN	Duke Energy Indiana	Office of Utility Consumer Counselor	Prepaid pension asset, inventories, regulatory assets and liabilities, unbilled revenues, incentive compensation, income tax expense, affiliate charges, ADIT, riders.
12/19	2019-00271	KY	Attorney General	Duke Energy Kentucky	ADIT, EDIT, CWC, payroll expense, incentive compensation expense, depreciation rates, pilot programs
05/20	202000067-EI	FL	Office of Public Counsel	Tampa Electric Company	Storm Protection Plan.
06/20	20190038-EI	FL	Office of Public Counsel	Gulf Power Company	Hurricane Michael costs.
07/20	PUR-2020-00015 Direct	VA	Old Dominion Committee for Fair Utility Rates	Appalachian Power Company	Coal Amortization Rider, storm damage, prepaid pension and OPEB assets, return on joint-use assets.
09/20	Surrebuttal				
07/20	2019-226-E Direct	SC	Office of Regulatory Staff	Dominion Energy South Carolina	Integrated Resource Plan.
09/20	Surrebuttal				
10/20	2020-00160	KY	Attorney General	Water Service Corporation of Kentucky	Return on rate base v. operating ratio.
10/20	2020-00174	KY	Attorney General and Kentucky Industrial Utility Customers, Inc.	Kentucky Power Company	Rate base v. capitalization, Rockport UPA, prepaid pension and OPEB, cash working capital, incentive compensation, Rockport 2 depreciation expense, EDIT, AML, grid modernization rider.
11/20	2020-125-E Direct	SC	Office of Regulatory Staff	Dominion Energy South Carolina	Summer 2 and 3 cancelled plant and transmission cost recovery; TCJA; regulatory assets.
12/20	Surrebuttal				
12/20	2020172-EI	FL	Office of Public Counsel	Florida Power & Light Company	Hurricane Dorian costs.
12/20	29849 (Panel with Philip Hayet, Tom Newsome)	GA	Georgia Public Service Commission Staff	Georgia Power Company	VCM23, Vogtle 3 and 4 rate impact analyses.
02/21	2019-224-E 2019-225-E Direct	SC	Office of Regulatory Staff	Duke Energy Carolinas, LLC, Duke Energy Progress, LLC	Integrated Resource Plans.
04/21	Surrebuttal				
03/21	51611	TX	Steering Committee of Cities Served by Oncor	Sharyland Utilities, L.L.C.	ADIT, capital structure, return on equity.

**Expert Testimony Appearances
of
Lane Kollen
As of August 2021**

Date	Case	Jurisdiction	Party	Utility	Subject
03/21	2020-00349 2020-00350	KY	Attorney General and Kentucky Industrial Utility Customers, Inc.	Kentucky Utilities Company and Louisville Gas and Electric Company	Rate base v. capitalization, retired plant costs, depreciation, securitization, staffing + payroll, pension + OPEB, AML, off-system sales margins.
04/21 Direct	18-857-EL-UNC 19-1338-EL-UNC 20-1034-EL-UNC 20-1476-EL-UNC	OH	The Ohio Energy Group	First Energy Ohio Companies	Significantly Excessive Earnings Test; legacy nuclear plant costs.
07/21	Supplemental Direct				
05/21	2021-00004 Direct	KY	Attorney General and Kentucky Industrial Utility Customers, Inc.	Kentucky Power Company	CPCN for CCR/ELG Projects at Mitchell Plant.
06/21	Supplemental Direct				
06/21	29849 (Panel with Philip Hayet, Tom Newsome)	GA	Georgia Public Service Commission Staff	Georgia Power Company	VCM24, Vogtle 3 and 4 rate impact analyses.
06/21	2021-00103	KY	Attorney General and Nucor Steel Gallatin	East Kentucky Power Cooperative, Inc.	Revenues, depreciation, interest, TIER, O&M, regulatory asset.
07/21	U-35441	LA	Louisiana Public Service Commission Staff	Southwestern Electric Power Company	Revenues, O&M depreciation, retirement rider.

EXHIBIT __ (LK-2)

Duke Energy Kentucky
Case No. 2021-00190
Attorney General's Second Set Data Requests
Date Received: August 4, 2021

AG-DR-02-020

REQUEST:

Refer to the Sch_C2.1 - Base Period and Sch_C2.1 - Forecasted Period tabs in STAFF-DR-01-054_Attachment_-_KPSC_GAS_SFRs-2021. Explain why the Company's forecast test year Account 489020 Commercial Gas Transportation in the test year is \$1.379 million compared to \$1.498 million in the base year. Describe all reasons why the Company forecasts a reduction in these revenues in the test year, especially when the Company forecasts significant increases in the test year Account 489030 Industrial Gas Transportation and Account 489040 OPA Gas Transportation compared to the base year. What is unique about Commercial Gas Transportation compared to the other transportation revenue accounts?

RESPONSE:

The main reason a decrease in revenues is anticipated for the commercial class is a projected decrease in volumes. The principal economic driver for sales to commercial customers is employment, and stronger-than expected job growth during 2021 has accompanied the recent surge in sales. As the economy re-approaches its pre-pandemic output level, that hiring will slow, implying a slowdown in sales projected by the model.

An upwards adjustment to Industrial sales was made for a new, large customer that is being added to the system, and that customer's volumes were allocated between Full Service and Transportation at the same proportion as the rest of industrial sales. The OPA class was more dramatically affected during the historical period for model estimation

because of COVID-motivated school closures, so there is some rebound anticipated there as well.

PERSONS RESPONSIBLE: Abby L. Motsinger
Benjamin W. Passty

EXHIBIT __ (LK-3)

AG-DR-02-005

REQUEST:

Refer to the Company's response to Staff 2-33, which provides a history of the O&M expense incurred by the Company for its new CIS each year from 2018 through 2022.

- a. Regarding the new CIS, provide the O&M expense that the Company considers developmental, including the implementation of each of the different modules/capabilities and in total, and the expense that the Company considers recurring post-development and post-implementation for each of different modules/capabilities, and in total, for each year 2018 through 2022 and forecast for 2023, by FERC O&M expense account/subaccount. In addition, describe the manner in which the Company made this determination, including a description of all accounting and tracking used to distinguish the expenses in this manner.
- b. Regarding the old CIS, provide the O&M expense incurred by the Company each year from 2018 through 2022 and forecast for 2023 by FERC O&M expense account/subaccount.

RESPONSE:

- a. Please see AG-DR-02-005(a) Attachment, pages 1-2, for the breakdown of O&M costs provided in response to Staff-DR-02-033 for costs incurred in 2018-2020. All of these costs are considered developmental costs and do not include any post-development costs. Please see AG-DR-02-005(a) Attachment, page 3, for the breakdown of O&M costs provided in response to STAFF-DR-02-033 for 2021 –

2022 as well as an estimate for 2023 between developmental costs and post-development ongoing costs.

- b. Please see AG-DR-02-005(b) Attachment.

PERSON RESPONSIBLE: Retha I. Hunsicker

Duke Energy Kentucky Gas - TOTAL O&M Actuals 2018 - 2020

Release/Account	2018	2019	2020	Total
PROJECT RELEASES				
R5-8 Core Meter-to-Cash: 315986A - Core				852,507.03
0408960	4,059.84	2,703.93	3,970.64	10,734.41
0903000	242,383.01	226,609.94	310,839.80	779,832.75
0903100	(164.76)	(0.00)	6,873.14	6,708.38
0903200	(1,503.56)	0.00	5,936.04	4,432.48
0903300	(124.77)	0.00	4,783.16	4,658.39
0910100	-	-	4.36	4.36
0921100	(0.00)	(0.00)	58.76	58.76
0921200	(0.00)	-	7.39	7.39
0921400	-	-	395.87	395.87
0921540	-	0.00	8,390.73	8,390.73
0923000	-	-	3.13	3.13
0926000	-	32.41	157.92	190.33
0926420	-	0.49	9.49	9.98
0926600	13,127.28	9,171.48	14,781.31	37,080.07
R1 - Analytics & Data Marketing: 315986B - Analytics				39,580.47
0408960	762.35	-	-	762.35
0903000	37,953.19	-	-	37,953.19
0903200	(1,135.27)	-	-	(1,135.27)
0926600	2,000.20	-	-	2,000.20
R2 - Customer Engagement: 315986C - CRM				177,935.18
0408960	1,597.04	630.00	-	2,227.04
0903000	93,390.64	76,066.31	(58.70)	169,398.25
0903200	(822.49)	-	-	(822.49)
0926000	0.00	3.32	-	3.32
0926600	5,143.83	1,985.23	-	7,129.06
R3 - Customer Engagement: 315986D				151,222.79
0408960	672.27	871.96	37.70	1,581.93
0903000	56,847.55	86,146.61	1,293.17	144,287.33
0903200	(81.29)	-	-	(81.29)
0926600	2,376.69	2,934.65	123.48	5,434.82
R4 - Universal Bill: 315986E - Bill Format				132,078.22
0408960	309.99	1,144.95	1,006.26	2,461.20
0902000	-	-	25.00	25.00
0903000	19,721.28	65,455.90	35,825.51	121,002.69
0903100	-	-	8.56	8.56
0903200	(86.04)	-	8.10	(77.94)
0903300	-	-	6.47	6.47

Duke Energy Kentucky Gas - TOTAL O&M Actuals 2018 - 2020

Release/Account	2018	2019	2020	Total
0920100	-	-	7.32	7.32
0921400	-	0.00	94.21	94.21
0926600	1,138.70	3,901.96	3,510.05	8,550.71
CROSS RELEASE				
Hardware: 315986HW1				20,635.39
0903000	19,235.33	-	-	19,235.33
0935200	1,400.06	-	-	1,400.06
Hardware: 315986HW4				3,038.25
0903000	645.38	2,392.87	-	3,038.25
Hardware: 315986HW5				876.65
0903000	-	603.08	273.57	876.65
Hardware: 315986HW6				2,447.75
0903000	-	-	2,447.75	2,447.75
315986L: Customer Connect Leadership				74,148.81
0408960	871.80	923.41	936.08	2,731.29
0903000	19,474.83	21,019.95	21,570.19	62,064.97
0926600	2,887.12	3,027.50	3,437.93	9,352.55
315986OM: Program & Support				206,414.68
0408960	271.91	1,053.85	1,689.74	3,015.50
0417320			1,426.53	1,426.53
0903000	18,886.92	65,969.60	105,579.99	190,436.51
0903100	9.08	-	-	9.08
0903200	2.57	-	-	2.57
0903300	2.06	-	-	2.06
0912000	10.25	-	-	10.25
0920000	17.97	-	-	17.97
0921100	23.25	(0.00)	7.97	31.22
0921200	36.47	-	-	36.47
0921980	(7.07)	-	-	(7.07)
0923000	415.12	0.00	29.89	445.01
0926600	1,054.39	3,700.45	6,148.25	10,903.09
0930250	4.51	-	-	4.51
0935100	-	-	80.98	80.98
Miscellaneous				7,767.78
0408960	30.57	(2.25)	-	28.32
0903000	17.39	3,678.24	3,119.35	6,814.98
0903100	-	0.00	-	0.00
0920000	-	-	(72.09)	(72.09)
0921100	88.33	(0.00)	-	88.33
0926600	(1.96)	(7.07)	-	(9.03)
0935100	725.04	192.23	-	917.27
Grand Total	543,667.00	580,211.00	544,775.00	1,668,653.00

	<u>2021*</u>	<u>2022</u>	<u>2023</u>
DEK-Gas	953,238	1,901,576	335,182
Developmental Costs	953,238	1,901,576	145,492
Ongoing post-development costs	-	85,400	335,182
*Represents a combination of actuals and forecast	953,238	1,986,976	480,674

Note that project costs are not forecasted by FERC account; however most O&M costs are anticipated to be recorded to FERC account 0903.

	Actuals 2018	Actuals 2019	Actuals 2020	Actuals + Forecast* 2021	Forecast 2022	Forecast 2023	Total
KY Gas O&M Total - CMS Applications & Operations	\$ 359,384	\$ 312,846	\$ 304,254	\$ 255,706	\$ 208,905	\$ 42,912	\$ 1,484,007

* The 2021 costs are actuals through June 2021

EXHIBIT __ (LK-4)

**Duke Energy Kentucky
Case No. 2021-00190
Attorney General's Second Set Data Requests
Date Received: August 4, 2021**

AG-DR-02-006

REQUEST:

Provide a timeline showing the development and implementation (go live) dates for each of the different modules/capabilities of the new CIS from the beginning of the design process through the end of the test year, and through the completion of the development and implementation periods for all modules/capabilities.

RESPONSE:

Please see AG-DR-02-006 Attachment.

PERSON RESPONSIBLE: Retha I. Hunsicker

EXHIBIT __ (LK-5)

Duke Energy Kentucky
Case No. 2021-00190
Attorney General's Second Set Data Requests
Date Received: August 4, 2021

AG-DR-02-017

REQUEST:

Refer to the Company's response to AG 1-41. Confirm that the Company did not remove the employer 401(k) match for employees who also participate in the defined benefit plan. If this is not correct, then provide a correct statement and indicate where this expense was removed.

RESPONSE:

The Company did not remove employer 401(k) match for employees who also participate in the defined benefit plan. The 401(k) plan is now our standard retirement plan that applies to all union and non-union new hires. Duke Energy has taken significant steps to both control costs and reduce the risk associated with its retirement plans by eliminating the pension benefit for all new hires, including union new hires, and moving all non-union pension eligible employees and the majority of union pension eligible employees to a cash balance design. In Case No. 2019-00271, to address the Commission's concerns around the expense for employees receiving both a pension benefit and a 401(k)-retirement benefit, the Company made a proforma adjustment to remove the pension cost for employees who also receive 401(k) match. However, in this rate case, pension expense for employees receiving both a pension benefit and a 401(k)-retirement benefit in the test period is a net credit of (\$287,880). In this proceeding it benefits customers to not include a proforma adjustment to remove the pension cost for employees who also receive 401(k) match since doing so would increase the test year revenue requirement.

PERSON RESPONSIBLE: Jay P. Brown

EXHIBIT __ (LK-6)

**Duke Energy Kentucky
Case No. 2021-00190
Attorney General's First Set Data Requests
Date Received: June 30, 2021**

AG-DR-01-041

REQUEST:

For employees who participate in a defined benefit plan, provide the total and jurisdictional amounts of matching contributions made on behalf of employees who also participate in any 401(k) retirement savings account.

RESPONSE:

The Duke Energy Kentucky Gas forecast test period amount (calendar year 2022) of employer 401(k) match for employees who also participate in the defined benefit plan is \$220,196.

PERSON RESPONSIBLE: Jake J. Stewart

EXHIBIT __ (LK-7)

**Duke Energy Kentucky
Case No. 2021-00190
Attorney General's Second Set Data Requests
Date Received: August 4, 2021**

AG-DR-02-018

REQUEST:

Refer to the Company's response to AG 1-60. Confirm that the Company did not remove the SERP expense in conjunction with its adjustments to remove incentive compensation tied to financial metrics. If this is not correct, then provide a correct statement and indicate where this expense was removed.

RESPONSE:

The Company did not remove SERP expense.

PERSON RESPONSIBLE: Jay P. Brown

EXHIBIT __ (LK-8)

**Duke Energy Kentucky
Case No. 2021-00190
Attorney General's First Set Data Requests
Date Received: June 30, 2021**

AG-DR-01-060

REQUEST:

Provide the amount of Supplemental Executive Retirement Plan ("SERP") costs included in the test year O&M expenses. Provide the amounts broken down between DEK directly incurred costs and costs allocated separately from each other affiliate.

RESPONSE:

Please see AG-DR-01-060 Attachment.

PERSON RESPONSIBLE: Jake J. Stewart

Provide the amount of Supplemental Executive Retirement Plan ("SERP") costs included in the test year O&M expenses. Provide the amounts broken down between DEK directly incurred costs and costs allocated separately from each other affiliate.

Test period: Calendar year 2022

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
DEK BUDGET for NQ Plans - Direct - (1/1/22 - 12/31/22)	139	139	139	139	139	139	139	139	139	139	139	139	1,668
DEK BUDGET for NQ Plans - Alloc - (1/1/22 - 12/31/22)	2,688	2,688	2,688	2,688	2,688	2,688	2,688	2,688	2,688	2,688	2,688	2,688	32,256
TOTAL DEK BUDGET for NQ Plans (1/1/22 - 12/31/22)													33,924

Assumptions:

- 1) Service and Non Service costs are included in the above numbers
- 2) Source for numbers = Towers Watson five year financial plan report
- 3) Direct numbers are calculated based on annual budget for DEK Gas
- 4) Allocated numbers are calculated based on annual budget for DEBs (using DGEF Allocation % to DEK Gas)

EXHIBIT __ (LK-9)

REQUEST:

Identify all association dues included in the revenue requirement. For each organization whose dues were included for recovery from ratepayers:¹

- a. Provide the name of the association to which those are paid;
- b. Provide the amount;
- c. Provide a description of the services the association provides to the Company;
- d. Discuss whether the association engages, directly or indirectly, in: (i) lobbying; (ii) political activities; (iii) regulatory advocacy; and/or (iv) public relations;
- e. Provide copies of the studies or other information DEK relied upon in making its decision on whether to include a test-year amount of dues for each such organization;
- f. Provide copies of all actual regulatory advocacy in which each such organization engaged before the Commission; and
- g. Discuss whether any portion of the dues paid to that association have been removed from the revenue requirement.

RESPONSE:

[REMAINDER OF PAGE INTENTIONALLY LEFT BLANK]

¹ Including, but not limited to the American Gas Association.

- a. Dues are included in the test year revenue requirement for the following organizations:

Line No.	Organization	Total Dues
1	American Gas Association (AGA)	\$ 50,000
2	Interstate Natural Gas Association of America (INGAA)	5,000
3	Midwest ENERGY Association (MEA)	20,000
4	Operations Technology Development (OTD)	<u>50,000</u>
5	Total Dues in the Test Year	\$125,000

- b. See response to (a) above.
- c. The Company receives many benefits from its membership in various associations such as (i) programs to help enhance the safe delivery of natural gas to customers, (ii) advocacy for natural gas industry issues, (iii) the exchange of information among members to help achieve operational excellence, (iv) help in responding to energy needs of customers, regulatory trends and emerging technologies, (v) collaboration with industry peers to learn successful practices of other members, and (vi) the combining of resources with other member to develop advanced technologies for the natural gas industry. More information concerning benefits of membership can be found on the websites of the various organizations.
- d. The AGA works with elected political leaders on key issues that could have an impact on its member companies, the energy utility sector and gas customers. INGAA is a trade organization that advocates regulatory and legislative positions of importance to the natural gas pipeline industry in North America.
- e. The Company did not rely on studies or other information when deciding to include dues for each organization in its test-year. The benefits of membership in these organizations provide customers and the public ongoing safety, efficiency and productivity in Duke Energy Kentucky's operations.

- f. The AGA routinely comments on numerous regulatory matters directly affecting AGA members at the Federal Energy Regulatory Commission, Environmental Protection Agency, Department of Energy, Department of Transportation/Pipeline and Hazardous Materials Safety Administration, and other federal agencies. The Company is not aware that the AGA or any of the other agencies listed in response to part (a) may have engaged in regulatory advocacy before the Kentucky Public Service Commission.
- g. None of the \$125,000 listed in the table above have been removed from the test year revenue requirement.

PERSON RESPONSIBLE: Jay P. Brown / Abby L. Motsinger – a., b., g.
Brian R. Weisker – c., d., e., f.

EXHIBIT __ (LK-10)

AG-DR-01-068

REQUEST:

Refer to the Direct Testimony of Jeffrey Setser at 9 wherein he states: “By the terms of the DEBS Service Agreement, compensation for any service rendered by DEBS to its utility affiliates is the fully embedded cost thereof (i.e., the sum of: (i) direct costs; (ii) indirect costs; and (iii) costs of capital).”

- a. Provide a description of the “costs of capital” and a template and illustration that shows how the cost of capital is calculated, first as a percentage, and then the base to which the percentage is applied, e.g., the accounts included as the investment or base for the dollar amount of the cost of capital.
- b. Provide the calculations reflected in the test year for DEBS in total and the amounts assigned/allocated to DEK.

RESPONSE:

The cost of capital uses a revenue requirement based on each jurisdiction’s allowed return for the use of common assets, which are used to provide service to customers. Please see AG-DR-01-068 Attachments 1 and 2 for responses to above questions.

PERSON RESPONSIBLE: Jeffrey R. Setser

**Ky PSC Case No. 2021-00190
 AG-DR-01-68(a)**

**DEBS PP&E Return Calculation
 2022 Budget**

Net PPE	975,000,000
CWIP	(285,000,000)
DEC capital lease NBV	648,686,047
Deferred taxes - P/S (below)	(55,541,919)
Total	(40,465,975) 0.07
	593,992,106

Deferred taxes Federal and State

Sub total	54,267,892
CWIP * 3.52%	(10,012,690)
Sub-Total	44,255,202
Deferred taxes Cap lease	(3,789,227)
Total	40,465,975

Source: Susie Koch EY

D

EXHIBIT __ (LK-11)

Duke Energy Kentucky
Case No. 2021-00190
Attorney General's Second Set Data Requests
Date Received: August 4, 2021

AG-DR-02-027

REQUEST:

Provide separately the Company's regulatory assets and liabilities related to pension and OPEB by month from January 2018 through the end of the test year by FERC account/subaccount in total and allocated to gas and the gas share of common. Provide a detailed description of each regulatory asset and liability and how it is calculated. Indicate whether the Company financed or avoided financing as a result of the regulatory asset or liability and, if so, provide all support for your position. In addition, provide all reasons why the Company did not include the net liability as a subtraction from rate base and removed all related ADIT balances from rate base.

RESPONSE:

Please see AG-DR-02-027 Attachment. The net balance of pension and OPEB is a net asset of \$3,626,331 as of December 31, 2022 (\$3,649,323 13-month average). The Company has not historically included the pension and OPEB regulatory assets as part of rate base, but if it did so, it would be an increase to rate base, not a subtraction from rate base as the question suggest. Regulatory assets and liabilities, which simply represent deferred gains/losses, are not considered when making financing decisions. Financing decisions are made when assessing a plan's Funded Status in accordance with funding rules.

PERSON RESPONSIBLE: Jay P. Brown

DUKE ENERGY KENTUCKY

	FERC 128 Total	FERC 128 Gas	FERC 182.3 Total	FERC 182.3 Gas	FERC 186 Total	FERC 186 Gas	FERC 228.3 Total	FERC 228.3 Gas
Jan 2018	1,256,346	345,998	32,090,706	8,837,781	-	-	-	-
Feb 2018	7,653,020	2,107,642	31,989,601	8,809,936	-	-	(18,259,243)	(5,028,596)
Mar 2018	7,723,986	2,127,186	31,834,834	8,767,313	-	-	(18,259,243)	(5,028,596)
Apr 2018	7,794,952	2,146,730	31,680,067	8,724,691	-	-	(18,259,243)	(5,028,596)
May 2018	7,865,918	2,166,274	31,525,300	8,682,068	-	-	(18,259,243)	(5,028,596)
Jun 2018	8,556,406	2,356,434	31,370,533	8,639,445	-	-	(18,878,765)	(5,199,212)
Jul 2018	8,007,850	2,205,362	31,215,766	8,596,822	-	-	(18,259,243)	(5,028,596)
Aug 2018	8,078,816	2,224,906	31,060,999	8,554,199	-	-	(18,259,243)	(5,028,596)
Sep 2018	9,115,105	2,510,300	30,906,232	8,511,576	-	-	(19,224,566)	(5,294,445)
Oct 2018	8,220,748	2,263,994	30,751,465	8,468,954	-	-	(18,259,243)	(5,028,596)
Nov 2018	8,291,714	2,283,538	30,596,698	8,426,331	-	-	(18,259,243)	(5,028,596)
Dec 2018	7,330,598	2,018,847	29,647,881	8,165,027	-	-	(16,433,111)	(4,525,679)
Jan 2019	6,010,124	1,450,243	29,647,881	7,154,034	-	-	(15,121,987)	(3,648,935)
Feb 2019	6,218,072	1,500,421	29,474,155	7,112,114	-	-	(15,121,987)	(3,648,935)
Mar 2019	7,894,787	1,905,012	29,387,292	7,091,154	-	-	(16,699,403)	(4,029,566)
Apr 2019	6,594,198	1,591,180	29,300,429	7,070,194	-	-	(15,299,515)	(3,691,773)
May 2019	6,782,261	1,636,560	29,213,566	7,049,234	-	-	(15,388,279)	(3,713,192)
Jun 2019	8,458,976	2,041,151	33,732,306	8,139,605	243,841	58,839	(21,609,612)	(5,214,399)
Jul 2019	7,158,387	1,727,319	33,606,342	8,109,210	241,757	58,336	(20,219,701)	(4,879,014)
Aug 2019	7,346,450	1,772,698	33,480,378	8,078,815	239,673	57,833	(20,318,442)	(4,902,840)
Sep 2019	9,023,165	2,177,290	36,422,208	8,788,679	315,677	76,173	(24,492,922)	(5,910,142)
Oct 2019	8,203,465	1,979,496	36,278,079	8,753,900	312,925	75,509	(23,579,887)	(5,689,827)
Nov 2019	8,391,528	2,024,876	36,133,950	8,719,122	310,174	74,845	(23,674,615)	(5,712,685)
Dec 2019	9,774,894	2,358,682	34,157,339	8,242,166	350,062	84,470	(23,593,846)	(5,693,195)
Jan 2020	9,715,563	2,580,454	34,157,339	9,072,189	350,062	92,977	(23,593,846)	(5,266,526)
Feb 2020	10,221,864	2,714,927	33,826,775	8,984,391	343,830	91,321	(23,774,372)	(6,314,473)
Mar 2020	10,445,349	2,774,285	33,661,493	8,940,493	-	-	(23,864,635)	(6,338,447)
Apr 2020	10,668,834	2,833,642	33,496,211	8,896,594	-	-	(23,954,898)	(6,362,421)
May 2020	10,892,319	2,893,000	33,330,929	8,852,695	-	-	(24,045,161)	(6,386,395)
Jun 2020	11,115,804	2,952,358	33,223,925	8,824,274	-	-	(24,135,424)	(6,410,369)
Jul 2020	11,339,289	3,011,715	33,068,356	8,782,955	-	-	(24,225,687)	(6,434,343)
Aug 2020	11,562,774	3,071,073	32,912,787	8,741,636	-	-	(24,315,950)	(6,458,316)
Sep 2020	11,786,259	3,130,430	32,757,218	8,700,317	-	-	(24,406,213)	(6,482,290)
Oct 2020	12,009,744	3,189,788	32,601,649	8,658,998	-	-	(24,496,476)	(6,506,264)
Nov 2020	12,233,229	3,249,146	32,446,080	8,617,679	-	-	(24,586,739)	(6,530,238)
Dec 2020	12,851,866	3,413,456	34,029,604	9,038,263	-	-	(26,811,247)	(7,121,067)
Jan 2021	12,829,565	3,635,899	34,029,604	9,643,990	-	-	(26,811,247)	(7,598,307)

DUKE ENERGY KENTUCKY

	FERC 128 Total	FERC 128 Gas	FERC 182.3 Total	FERC 182.3 Gas	FERC 186 Total	FERC 186 Gas	FERC 228.3 Total	FERC 228.3 Gas
Pension								
Feb 2021	13,347,730	3,782,747	33,692,432	9,548,435	-	-	(26,979,805)	(7,546,077)
Mar 2021	13,595,662	3,853,011	33,523,846	9,500,658	-	-	(27,064,084)	(7,669,961)
Apr 2021	13,843,594	3,923,275	33,355,260	9,452,881	-	-	(27,148,363)	(7,693,846)
May 2021	14,091,526	3,993,538	33,186,674	9,405,103	-	-	(27,232,642)	(7,717,731)
Jun 2021	14,339,458	4,063,802	33,018,088	9,357,326	-	-	(27,316,921)	(7,741,615)
Jul 2021	14,587,390	4,134,066	32,849,502	9,309,549	-	-	(27,401,200)	(7,765,500)
Aug 2021	14,835,322	4,204,330	32,680,916	9,261,772	-	-	(27,485,479)	(7,789,385)
Sep 2021 (estimated)	15,083,254	4,274,594	32,512,330	9,213,994	-	-	(27,569,758)	(7,813,269)
Oct 2021 (estimated)	15,331,186	4,344,858	32,343,744	9,166,217	-	-	(27,654,037)	(7,837,154)
Nov 2021 (estimated)	15,579,118	4,415,122	32,175,158	9,118,440	-	-	(27,738,316)	(7,861,039)
Dec 2021 (estimated)	15,827,050	4,485,386	32,006,572	9,070,663	-	-	(27,822,595)	(7,884,923)
Jan 2022 (estimated)	16,162,628	4,580,489	31,763,325	9,001,726	-	-	(27,897,783)	(7,906,232)
Feb 2022 (estimated)	16,162,628	4,580,489	31,763,325	9,001,726	-	-	(27,897,783)	(7,906,232)
Mar 2022 (estimated)	16,075,479	4,555,791	31,763,325	9,001,726	-	-	(27,897,783)	(7,906,232)
Apr 2022 (estimated)	16,075,479	4,555,791	31,763,325	9,001,726	-	-	(27,897,783)	(7,906,232)
May 2022 (estimated)	16,075,479	4,555,791	32,098,903	9,096,829	-	-	(28,053,881)	(7,950,470)
Jun 2022 (estimated)	16,075,479	4,555,791	32,098,903	9,096,829	-	-	(28,053,881)	(7,950,470)
Jul 2022 (estimated)	16,075,479	4,555,791	32,011,754	9,072,131	-	-	(28,053,881)	(7,950,470)
Aug 2022 (estimated)	16,075,479	4,555,791	32,011,754	9,072,131	-	-	(28,053,881)	(7,950,470)
Sep 2022 (estimated)	16,075,479	4,555,791	32,011,754	9,072,131	-	-	(27,718,303)	(7,855,367)
Oct 2022 (estimated)	16,075,479	4,555,791	32,011,754	9,072,131	-	-	(27,718,303)	(7,855,367)
Nov 2022 (estimated)	16,075,479	4,555,791	32,011,754	9,072,131	-	-	(27,805,452)	(7,880,065)
Dec 2022 (estimated)	16,075,479	4,555,791	32,011,754	9,072,131	-	-	(27,805,452)	(7,880,065)

	FERC 182.3 Total	FERC 182.3 Gas	FERC 228.3 Total	FERC 228.3 Gas	FERC 254 Total	FERC 254 Gas
OPEB						
Jan 2018	-	-	(4,882,653)	(1,330,913)	(4,882,653)	(1,330,913)
Feb 2018	(42,570)	(11,724)	(4,467,984)	(1,230,483)	(4,798,435)	(1,321,489)
Mar 2018	(63,855)	(17,586)	(4,467,008)	(1,230,214)	(4,781,326)	(1,316,777)
Apr 2018	(85,140)	(23,448)	(4,467,840)	(1,230,443)	(4,764,217)	(1,312,065)
May 2018	(106,425)	(29,309)	(4,462,328)	(1,228,925)	(4,747,108)	(1,307,353)
Jun 2018	(127,710)	(35,171)	(4,469,319)	(1,230,851)	(4,729,999)	(1,302,642)
Jul 2018	(148,995)	(41,033)	(4,473,720)	(1,232,062)	(4,712,890)	(1,297,930)
Aug 2018	(170,280)	(46,895)	(4,471,488)	(1,231,448)	(4,695,781)	(1,293,218)
Sep 2018	(191,565)	(52,757)	(4,489,203)	(1,236,327)	(4,678,672)	(1,288,506)
Oct 2018	(212,850)	(58,619)	(4,496,234)	(1,238,263)	(4,661,563)	(1,283,794)

DUKE ENERGY KENTUCKY

	FERC 128 Total	FERC 128 Gas	FERC 182.3 Total	FERC 182.3 Gas	FERC 186 Total	FERC 186 Gas	FERC 228.3 Total	FERC 228.3 Gas
Nov 2018	(234,135)	(64,481)	(4,834,190)	(1,331,336)	(4,644,454)	(1,279,083)		
Dec 2018	(255,420)	(70,343)	(4,042,983)	(1,113,437)	(5,205,637)	(1,433,632)		
Jan 2019	(255,420)	(61,633)	(4,028,937)	(972,182)	(5,205,637)	(1,256,120)		
Feb 2019	(294,044)	(70,953)	(4,023,711)	(970,921)	(5,168,779)	(1,247,226)		
Mar 2019	2,016,838	486,863	(4,035,536)	(973,775)	(5,150,350)	(1,242,779)		
Apr 2019	1,997,526	482,003	(4,019,189)	(969,830)	(5,131,921)	(1,238,332)		
May 2019	1,978,214	477,343	(4,022,031)	(970,516)	(5,113,492)	(1,233,886)		
Jun 2019	1,958,902	472,683	(4,032,776)	(973,109)	(5,095,063)	(1,229,439)		
Jul 2019	1,939,590	468,023	(4,026,198)	(971,522)	(5,076,634)	(1,224,992)		
Aug 2019	1,920,278	463,363	(4,034,264)	(973,468)	(5,058,205)	(1,220,545)		
Sep 2019	1,900,966	458,703	(4,054,017)	(978,234)	(5,039,776)	(1,216,098)		
Oct 2019	1,881,654	454,043	(4,029,965)	(972,430)	(5,021,347)	(1,211,651)		
Nov 2019	1,862,342	449,383	(4,385,294)	(1,058,172)	(5,002,918)	(1,207,204)		
Dec 2019	1,843,030	444,723	(3,870,613)	(933,979)	(5,328,516)	(1,285,771)		
Jan 2020	1,843,030	489,509	(3,852,330)	(1,023,179)	(5,328,516)	(1,415,254)		
Feb 2020	1,808,262	480,274	(3,845,187)	(1,021,282)	(5,292,954)	(1,405,809)		
Mar 2020	1,790,878	475,657	(3,834,243)	(1,018,375)	(5,275,173)	(1,401,086)		
Apr 2020	1,773,494	471,040	(3,803,974)	(1,010,336)	(5,257,392)	(1,396,363)		
May 2020	1,756,110	466,423	(3,782,751)	(1,004,699)	(5,239,611)	(1,391,641)		
Jun 2020	1,738,726	461,806	(3,776,376)	(1,003,005)	(5,221,830)	(1,386,918)		
Jul 2020	1,721,342	457,188	(3,767,964)	(1,000,771)	(5,204,049)	(1,382,195)		
Aug 2020	1,703,958	452,571	(3,736,509)	(992,417)	(5,186,268)	(1,377,473)		
Sep 2020	1,686,574	447,954	(3,710,813)	(985,592)	(5,168,487)	(1,372,750)		
Oct 2020	1,669,190	443,337	(3,662,653)	(972,801)	(5,150,706)	(1,368,027)		
Nov 2020	1,651,806	438,720	(3,804,349)	(1,010,435)	(5,132,925)	(1,363,305)		
Dec 2020	1,634,422	434,102	(2,713,204)	(720,627)	(6,041,411)	(1,604,599)		
Jan 2021	1,634,422	463,195	(2,706,639)	(767,061)	(6,041,411)	(1,712,136)		
Feb 2021	1,603,166	454,337	(2,657,706)	(753,194)	(6,009,239)	(1,703,018)		
Mar 2021	1,587,538	449,908	(2,651,557)	(751,451)	(5,983,153)	(1,698,459)		
Apr 2021	1,571,910	445,479	(2,617,325)	(741,750)	(5,977,067)	(1,693,901)		
May 2021	1,556,282	441,050	(2,586,708)	(733,073)	(5,960,981)	(1,689,342)		
Jun 2021	1,540,654	436,621	(2,582,568)	(731,900)	(5,944,895)	(1,684,783)		
Jul 2021	1,525,026	432,192	(2,577,317)	(730,412)	(5,928,809)	(1,680,224)		
Aug 2021	1,509,398	427,763	(2,581,541)	(731,609)	(5,912,723)	(1,675,666)		
Sep 2021 (estimated)	1,493,770	423,334	(2,585,764)	(732,806)	(5,896,637)	(1,671,107)		
Oct 2021 (estimated)	1,478,142	418,905	(2,589,988)	(734,003)	(5,880,551)	(1,666,548)		
Nov 2021 (estimated)	1,462,514	414,476	(2,594,212)	(735,200)	(5,864,465)	(1,661,989)		

DUKE ENERGY KENTUCKY

Pension	FERC 128		FERC 128		FERC 182.3		FERC 182.3		FERC 186		FERC 228.3	
	Total	Gas	Total	Gas	Total	Gas	Total	Gas	Total	Gas	Total	Gas
Dec 2021 (estimated)	1,445,886	410,047	(2,598,436)	(736,397)	(5,848,379)	(1,657,431)						
Jan 2022 (estimated)	1,432,901	406,084	(2,598,304)	(736,359)	(5,875,030)	(1,664,984)						
Feb 2022 (estimated)	1,418,916	402,121	(2,598,172)	(736,322)	(5,901,681)	(1,672,536)						
Mar 2022 (estimated)	1,404,931	398,157	(2,598,040)	(736,285)	(5,928,332)	(1,680,089)						
Apr 2022 (estimated)	1,390,946	394,194	(2,597,908)	(736,247)	(5,954,983)	(1,687,642)						
May 2022 (estimated)	1,376,961	390,231	(2,597,776)	(736,210)	(5,981,634)	(1,695,195)						
Jun 2022 (estimated)	1,362,976	386,267	(2,597,644)	(736,172)	(6,008,285)	(1,702,748)						
Jul 2022 (estimated)	1,348,991	382,304	(2,597,512)	(736,135)	(6,034,936)	(1,710,301)						
Aug 2022 (estimated)	1,335,006	378,341	(2,597,380)	(736,097)	(6,061,587)	(1,717,854)						
Sep 2022 (estimated)	1,321,021	374,377	(2,597,248)	(736,060)	(6,088,238)	(1,725,407)						
Oct 2022 (estimated)	1,307,036	370,414	(2,597,116)	(736,023)	(6,114,889)	(1,732,960)						
Nov 2022 (estimated)	1,293,051	366,451	(2,596,984)	(735,985)	(6,141,540)	(1,740,512)						
Dec 2022 (estimated)	1,279,066	362,487	(2,596,852)	(735,948)	(6,168,191)	(1,748,065)						

EXHIBIT __ (LK-12)

Duke Energy Kentucky
Case No. 2021-00190
Attorney General's First Set Data Requests
Date Received: June 30, 2021

CONFIDENTIAL AG-DR-01-019
(As to Attachment (d) only)

REQUEST:

Refer to the Direct Testimony of Ms. Spiller at page 23 related to the new CIS system planned to be placed into service by the spring of 2022. Refer also to the Direct Testimony of Ms. Hunsicker for a more detailed description of the project.

- a. Provide the capital investment amount added to rate base in this case related to each component of the new CIS system. Provide plant additions by FERC and Company plant account number and in total and by month. In addition, provide the total amount of capital investment, the affiliate responsible for the capital investment, and the allocation and allocation basis for the DEK portion of the overall investment.
- b. If the capital investment will be made by an affiliate, describe how the costs related to the new CIS system will be allocated to DEK. In other words, will the plant be allocated to DEK's plant assets and subject to DEK depreciation rates, or will the plant assets remain on the affiliate's books and DEK will be charged a return on and depreciation expense billed for them on a monthly basis.
- c. Provide the depreciation rate(s) or amortization rates applied in the test year for the DEK portion of the new CIS system.

- d. Provide the estimated life span of the new CIS system and all support for this life span.
- e. Provide a detailed calculation of the revenue requirement included in the test year for each component of the new CIS system, including providing all components of providing all components of the return on, income tax expense, depreciation expense, property tax expense, and all other expenses of investment costs. Provide in electronic format with all formulas intact.

RESPONSE:

CONFIDENTIAL PROPRIETARY TRADE SECRET (As to Attachment (d) only)

- a. Please see AG-DR-01-019(a) Attachment.
- b. The assets will not be on an affiliate's books and allocated to Duke Energy Kentucky gas.
- c. The software assets from projects 315986A and 315986F will have a 6.67% yearly amortization, the other software assets from projects 315986B, 315986C, 315986D, 315986E will have a 20% yearly amortization and the hardware assets from projects 315986HW5, 315986HW6, 315986HW7, 315986HW1 & 315986HW4 have a 22.95% yearly depreciation rate.
- d. The hardware is expected to have a life span of 5 years. This life span is supported by the most recently approved depreciation study for Duke Energy Kentucky gas. The software assets with the 20% amortization rate are expected to have a 5 year lifespan. The 6.67% yearly amortization software is expected to have a lifespan of 15 years. Please see AG-DR-01-019(d) Confidential Attachment.

- e. The Company does not calculate revenue requirements separately by capital project. However, see AG-DR-01-019(e) Attachment for an estimated revenue requirement.

PERSON RESPONSIBLE: David G. Raiford – a. through d.
Jay P. Brown – e.

**CONFIDENTIAL PROPRIETARY TRADE
SECRET**

**AG-DR-01-019(d) CONFIDENTIAL
ATTACHMENT**

FILED UNDER SEAL

Duke Energy Kentucky
 Estimated Revenue Requirement
 CIS Replacement

Line	Description	Test Period
1	Gross Plant ^(a)	\$ 2,653,553
2	Accumulated Depreciation	(521,750)
3	Net Plant in Service	\$ 2,131,803
4	Accum Def Income Taxes on Plant ^(b)	\$ (30,198)
5	Rate Base	\$ 2,101,605
6	Return on Rate Base (Pre-Tax %) ^(c)	8.81%
7	Return on Rate Base (Pre-Tax)	\$ 185,151
8	Depreciation Expense	207,380
9	Annualized Property Tax Expense ^(d)	16,202
10	Revenue Requirement (Lines 7 - 9)	\$ 408,733

Assumptions:

- ^(a) 13 month average of cumulative gross plant
- ^(b) Assumes software has a 15 year book life; 15 year MACRS and hardware has a
- ^(c) Weighted-Average Cost of Capital from Schedule A in Case No. 21-00190, with

Duke Energy/Kentucky
Estimated Revenue Requirement
CS Replacement

Project	Property, Plant and Equipment (Capital)									
	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026
CS Replacement	\$ -	\$ 166,712	\$ 98,309	\$ 110,570	\$ -	\$ 112,639	\$ -	\$ -	\$ -	\$ -
Cumulative Gross Plant	\$ -	\$ 166,712	\$ 266,021	\$ 376,591	\$ 376,591	\$ 489,430	\$ 489,430	\$ 489,430	\$ 489,430	\$ 489,430
Depreciation Expense	\$ -	\$ 16,671	\$ 43,273	\$ 64,261	\$ 75,318	\$ 86,620	\$ 97,886	\$ 97,886	\$ 97,886	\$ 97,886
Accumulated Depreciation	\$ -	\$ (16,671)	\$ (59,945)	\$ (124,206)	\$ (199,524)	\$ (286,126)	\$ (384,012)	\$ (481,898)	\$ (489,430)	\$ (489,430)
Accumulated Deferred Income Tax	\$ -	\$ (3,301)	\$ (9,788)	\$ (14,332)	\$ (13,983)	\$ (11,029)	\$ (5,550)	\$ 6,580	\$ (4,055)	\$ (1,365)

Book Life	Year Life
5.00	5.00

5-Yr MACRS	The Depreciation on									
	2017 Spend	2018 Spend	2019 Spend	2020 Spend	2021 Spend	2022 Spend	2023 Spend	2024 Spend	2025 Spend	2026 Spend
20.00%	\$ -	\$ 33,342	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
31.00%	\$ 166,712	\$ 53,348	\$ 19,862	\$ 19,862	\$ 19,862	\$ 19,862	\$ 19,862	\$ 19,862	\$ 19,862	\$ 19,862
19.20%	\$ 95,268	\$ 32,009	\$ 31,779	\$ 22,114	\$ 22,114	\$ 22,114	\$ 22,114	\$ 22,114	\$ 22,114	\$ 22,114
11.52%	\$ 103,370	\$ 19,205	\$ 19,067	\$ 9,532	\$ 9,532	\$ 9,532	\$ 9,532	\$ 9,532	\$ 9,532	\$ 9,532
5.76%	\$ 112,839	\$ 19,205	\$ 11,440	\$ 21,229	\$ 21,229	\$ 21,229	\$ 21,229	\$ 21,229	\$ 21,229	\$ 21,229
2027	\$ -	\$ 9,603	\$ 11,440	\$ 12,738	\$ 12,738	\$ 12,738	\$ 12,738	\$ 12,738	\$ 12,738	\$ 12,738
2028	\$ -	\$ -	\$ 5,720	\$ 12,738	\$ 12,738	\$ 12,738	\$ 12,738	\$ 12,738	\$ 12,738	\$ 12,738
2029	\$ -	\$ -	\$ -	\$ 6,369	\$ 6,369	\$ 6,369	\$ 6,369	\$ 6,369	\$ 6,369	\$ 6,369
2030	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
2031	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
2032	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
2033	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
2034	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
2035	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
2036	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
2037	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
100.00%	\$ 489,430	\$ 166,712	\$ 99,809	\$ 110,570	\$ 99,809	\$ 110,570	\$ 112,639	\$ 112,639	\$ 112,639	\$ 112,639

Cap Addition	2017 Spend	2018 Spend	2019 Spend	2020 Spend	2021 Spend	2022 Spend	2023 Spend	2024 Spend	2025 Spend	2026 Spend	Total	Year Deprec	Book Depreciation	Gross Plant	Accumulated Depreciation	Deferred Tax	ADIT	
2017	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
2018	\$ 166,712	\$ 33,342	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 33,342	\$ 33,342	\$ 16,671	\$ 166,712	\$ 16,671	\$ 3,501	\$ 3,501	
2019	\$ 95,268	\$ 53,348	\$ 19,862	\$ 19,862	\$ 19,862	\$ 19,862	\$ 19,862	\$ 19,862	\$ 19,862	\$ 19,862	\$ 79,210	\$ 79,210	\$ 43,273	\$ 266,021	\$ 59,945	\$ 6,287	\$ 9,788	
2020	\$ 103,370	\$ 32,009	\$ 31,779	\$ 22,114	\$ 22,114	\$ 22,114	\$ 22,114	\$ 22,114	\$ 22,114	\$ 22,114	\$ 85,902	\$ 85,902	\$ 64,261	\$ 124,206	\$ 124,206	\$ 4,544	\$ 14,132	
2021	\$ 112,839	\$ 19,205	\$ 19,067	\$ 9,532	\$ 9,532	\$ 9,532	\$ 9,532	\$ 9,532	\$ 9,532	\$ 9,532	\$ 73,655	\$ 73,655	\$ 75,318	\$ 376,591	\$ 196,574	\$ (848)	\$ 13,893	
2022	\$ -	\$ 19,205	\$ 11,440	\$ 21,229	\$ 21,229	\$ 21,229	\$ 21,229	\$ 21,229	\$ 21,229	\$ 21,229	\$ 74,443	\$ 74,443	\$ 86,602	\$ 489,430	\$ 286,126	\$ (2,553)	\$ 11,429	
2023	\$ -	\$ 9,603	\$ 11,440	\$ 12,738	\$ 12,738	\$ 12,738	\$ 12,738	\$ 12,738	\$ 12,738	\$ 12,738	\$ 69,889	\$ 69,889	\$ 97,886	\$ 489,430	\$ 384,012	\$ (5,878)	\$ 5,150	
2024	\$ -	\$ -	\$ 5,720	\$ 12,738	\$ 12,738	\$ 12,738	\$ 12,738	\$ 12,738	\$ 12,738	\$ 12,738	\$ 40,123	\$ 40,123	\$ 97,886	\$ 489,430	\$ 481,898	\$ (12,130)	\$ (6,580)	
2025	\$ -	\$ -	\$ -	\$ 6,369	\$ 6,369	\$ 6,369	\$ 6,369	\$ 6,369	\$ 6,369	\$ 6,369	\$ 19,368	\$ 19,368	\$ 7,532	\$ 489,430	\$ 489,430	\$ 2,486	\$ (4,055)	
2026	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 12,999	\$ 12,999	\$ 7,532	\$ 489,430	\$ 489,430	\$ 2,730	\$ (1,365)	
2027	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 5,500	\$ 5,500	\$ -	\$ 489,430	\$ 489,430	\$ 1,365	\$ -	

EXHIBIT __ (LK-13)

**Duke Energy Kentucky
Case No. 2021-00190
Attorney General's Second Set Data Requests
Date Received: August 4, 2021**

AG-DR-02-026

REQUEST:

Provide the Company's average daily short-term investment balances and the average interest rates on those balances in the Money Pool each month from January 2018 through December 2022 in an Excel spreadsheet in live format and with all formulas intact.

RESPONSE:

Please see AG-DR-02-026 Attachment for the requested Duke Energy Money Pool information. Note that the forecast is developed on a monthly basis. Therefore, the forecasted information is monthly only.

PERSON RESPONSIBLE: Chris R. Bauer

Money Pool Borrowings - Including \$25 million long-term balance

Historical Information:

	Daily Average	
	Borrowings	Rate
Jan-18	\$ 26,088,967.74	1.745%
Feb-18	\$ 28,214,964.29	1.789%
Mar-18	\$ 30,558,806.45	2.020%
Apr-18	\$ 59,500,333.33	2.282%
May-18	\$ 87,583,677.42	2.207%
Jun-18	\$ 107,135,933.33	2.230%
Jul-18	\$ 106,836,870.97	2.228%
Aug-18	\$ 111,937,870.97	2.148%
Sep-18	\$ 100,815,233.33	2.141%
Oct-18	\$ 81,857,677.42	2.355%
Nov-18	\$ 72,058,566.67	2.424%
Dec-18	\$ 71,300,774.19	2.656%
Jan-19	\$ 55,218,451.61	2.729%
Feb-19	\$ 64,345,892.86	2.721%
Mar-19	\$ 65,006,677.42	2.692%
Apr-19	\$ 74,713,900.00	2.685%
May-19	\$ 79,345,225.81	2.678%
Jun-19	\$ 86,648,266.67	2.635%
Jul-19	\$ 102,508,516.13	2.563%
Aug-19	\$ 78,744,516.13	2.345%
Sep-19	\$ 85,334,833.33	2.233%
Oct-19	\$ 42,708,806.45	2.095%
Nov-19	\$ 62,909,766.67	1.833%
Dec-19	\$ 95,159,612.90	1.830%
Jan-20	\$ 104,274,935.48	1.766%
Feb-20	\$ 100,528,892.86	1.716%
Mar-20	\$ 101,341,903.23	1.742%
Apr-20	\$ 109,197,300.00	1.317%
May-20	\$ 105,227,612.90	0.729%
Jun-20	\$ 106,890,366.67	0.292%
Jul-20	\$ 106,720,258.06	0.239%
Aug-20	\$ 120,197,387.10	0.212%
Sep-20	\$ 92,832,233.33	0.180%
Oct-20	\$ 61,363,451.61	0.213%
Nov-20	\$ 75,670,600.00	0.219%
Dec-20	\$ 92,094,032.26	0.248%
Jan-21	\$ 88,858,677.42	0.242%
Feb-21	\$ 99,610,607.14	0.202%
Mar-21	\$ 100,863,741.94	0.195%
Apr-21	\$ 94,409,366.67	0.157%
May-21	\$ 88,752,870.97	0.163%
Jun-21	\$ 70,261,966.67	0.165%

Forecasted information:

	Daily Average and End of Month	
	Borrowings	Rate
Jul-21	115,587,004	0.1668%
Aug-21	114,577,642	0.1792%
Sep-21	25,000,000	0.1915%
Oct-21	25,000,000	0.1915%
Nov-21	25,000,000	0.2224%
Dec-21	25,000,000	0.2513%
Jan-22	25,000,000	0.2513%
Feb-22	25,000,000	0.2336%
Mar-22	25,000,000	0.2146%
Apr-22	25,000,000	0.2146%
May-22	25,000,000	0.2367%
Jun-22	25,898,283	0.2587%
Jul-22	33,334,072	0.2587%
Aug-22	36,234,630	0.2980%
Sep-22	25,000,000	0.3899%
Oct-22	25,000,000	0.3899%
Nov-22	25,000,000	0.3899%
Dec-22	25,000,000	0.3899%

Issuer	Borrower	Settlement	Maturity	Maturity Month	Maturity Year	Combined	Term in Period	Rate	Rate in %	Principal	Interest in Period	Weighted ParValue
						1 2018 Total			1.76%			\$808,758,000.00
						2 2018 Total			1.82%			\$790,019,000.00
						3 2018 Total			2.31%			\$947,323,000.00
						4 2018 Total			2.31%			\$1,785,010,000.00
						5 2018 Total			2.21%			\$2,715,084,000.00
						6 2018 Total			1.91%			\$3,214,078,000.00
						7 2018 Total			1.94%			\$3,311,943,000.00
						8 2018 Total			2.19%			\$3,470,074,000.00
						9 2018 Total			2.12%			\$3,024,457,000.00
						10 2018 Total			2.42%			\$2,537,588,000.00
						11 2018 Total			2.56%			\$2,161,757,000.00
						12 2018 Total			2.79%			\$2,210,324,000.00
						1 2019 Total			2.76%			\$1,711,772,000.00
						2 2019 Total			2.77%			\$1,801,885,000.00
						3 2019 Total			2.70%			\$2,015,207,000.00
						4 2019 Total			2.68%			\$2,241,417,000.00
						5 2019 Total			2.67%			\$2,459,702,000.00
						6 2019 Total			2.32%			\$2,599,448,000.00
						7 2019 Total			2.53%			\$3,177,764,000.00
						8 2019 Total			2.30%			\$2,441,080,000.00
						9 2019 Total			2.19%			\$2,560,045,000.00
						10 2019 Total			2.03%			\$1,323,973,000.00
						11 2019 Total			1.84%			\$1,887,293,000.00
						12 2019 Total			1.91%			\$2,949,948,000.00
						1 2020 Total			1.78%			\$3,232,523,000.00
						2 2020 Total			1.77%			\$2,814,809,000.00
						3 2020 Total			2.25%			\$3,141,599,000.00
						4 2020 Total			1.47%			\$3,275,919,000.00
						5 2020 Total			0.52%			\$3,262,056,000.00
						6 2020 Total			0.27%			\$3,206,711,000.00
						7 2020 Total			0.26%			\$3,308,328,000.00
						8 2020 Total			0.24%			\$3,726,119,000.00
						9 2020 Total			0.23%			\$2,784,967,000.00
						10 2020 Total			0.22%			\$1,902,267,000.00
						11 2020 Total			0.23%			\$2,270,118,000.00
						12 2020 Total			0.22%			\$2,854,915,000.00
						1 2021 Total			0.22%			\$2,754,619,000.00
						2 2021 Total			0.20%			\$2,789,097,000.00
						3 2021 Total			0.04%			\$3,126,776,000.00
						4 2021 Total			0.03%			\$2,832,281,000.00
						5 2021 Total			0.01%			\$2,751,339,000.00
						6 2021 Total			0.17%			\$2,107,859,000.00
						Grand Total						\$79,311,636,000.00

Days in Month	Daily Average	Month End	Weight	Daily Mtd Avg
31	26,088,967.74	\$35,888,000.00	100.00%	1.75%
28	26,214,964.29	\$36,129,000.00	100.00%	1.79%
31	30,558,806.45	\$57,252,000.00	100.00%	2.02%
30	59,500,333.33	\$202,825,000.00	100.00%	2.28%
31	87,583,677.42	\$117,951,000.00	100.00%	2.21%
30	107,136,933.33	\$100,430,000.00	100.00%	2.23%
31	106,836,870.97	\$120,744,000.00	100.00%	2.23%
31	111,937,870.97	\$114,959,000.00	100.00%	2.15%
30	100,615,233.33	\$127,161,000.00	100.00%	2.14%
31	81,857,677.42	\$79,316,000.00	100.00%	2.35%
30	72,058,566.67	\$93,030,000.00	100.00%	2.42%
31	71,300,774.19	\$131,797,000.00	100.00%	2.66%
31	55,218,451.61	\$75,233,000.00	100.00%	2.73%
28	64,345,892.86	\$72,972,000.00	100.00%	2.72%
31	65,006,677.42	\$74,603,000.00	100.00%	2.69%
30	74,713,900.00	\$82,874,000.00	100.00%	2.68%
31	79,345,225.81	\$93,586,000.00	100.00%	2.68%
30	86,646,266.67	\$112,621,000.00	100.00%	2.64%
31	102,508,516.13	\$88,558,000.00	100.00%	2.56%
31	78,744,516.13	\$86,225,000.00	100.00%	2.34%
30	85,334,833.33	\$75,000,000.00	100.00%	2.23%
31	42,708,806.45	\$64,554,000.00	100.00%	2.09%
30	62,909,766.67	\$169,508,000.00	100.00%	1.83%
31	95,159,612.90	\$109,862,000.00	100.00%	1.83%
31	104,274,935.48	\$110,524,000.00	100.00%	1.77%
28	100,528,892.86	\$102,366,000.00	100.00%	1.72%
31	101,341,903.23	\$116,581,000.00	100.00%	1.74%
30	109,197,300.00	\$118,498,000.00	100.00%	1.32%
31	105,227,612.90	\$120,979,000.00	100.00%	0.73%
30	106,890,366.67	\$102,394,000.00	100.00%	0.29%
31	106,730,258.06	\$127,207,000.00	100.00%	0.24%
31	120,197,387.10	\$92,439,000.00	100.00%	0.21%
30	92,832,233.33	\$64,831,000.00	100.00%	0.18%
31	61,363,451.61	\$75,016,000.00	100.00%	0.21%
30	75,670,600.00	\$270,924,000.00	100.00%	0.22%
31	92,094,032.26	\$101,783,000.00	100.00%	0.25%
31	88,858,677.42	\$104,174,000.00	100.00%	0.24%
28	99,610,607.14	\$105,157,000.00	100.00%	0.20%
30	100,863,741.94	\$106,804,000.00	100.00%	0.20%
30	94,409,366.67	\$106,432,000.00	100.00%	0.16%
31	88,752,870.97	\$106,363,000.00	100.00%	0.16%
30	70,261,966.67	\$53,848,000.00	100.00%	0.17%

\$000s

	Jul-21	Aug-21	Sep-21	Oct-21	Nov-21	Dec-21	Jan-22	Feb-22	Mar-22	Apr-22	May-22	Jun-22	Jul-22	Aug-22	Sep-22	Oct-22	Nov-22	Dec-22
Moneypool Payable	90,587	88,578	0	0	0	0	0	0	0	0	0	898	8,344	11,215	0	0	0	0
CP LT Debt	25,000	25,000	25,000	25,000	25,000	25,000	25,000	25,000	25,000	25,000	25,000	25,000	25,000	25,000	25,000	25,000	25,000	25,000
Rate	115,587,004	114,577,642	25,000,000	25,000,000	25,000,000	25,000,000	25,000,000	25,000,000	25,000,000	25,000,000	25,000,000	25,000,000	33,334,077	36,234,656	25,000,000	25,000,000	25,000,000	25,000,000

forward 1 month LIBOR pulled from Bloomberg. See AG-DR-01-003 Attachments 4 and 5 for the Bloomberg screenshots

EXHIBIT __ (LK-14)

**Duke Energy Kentucky
Case No. 2021-00190
Attorney General's First Set Data Requests
Date Received: June 30, 2021**

AG-DR-01-047

REQUEST:

Refer to Schedule J-1 for the base and forecast test years. Provide a schedule in electronic spreadsheet format showing each of the Company's actual components of capital for each month in 2019, 2020, and 2021 to date and projected for each month thereafter through the end of the test year.

RESPONSE:

Please see AG-DR-01-047 Attachment for the components of capital from 2019 through the test year.

PERSON RESPONSIBLE: Chris R. Bauer

DUKE ENERGY KENTUCKY
 Case No. 2021-00190
 Attorney General
 First Set Data Requests
 AG-DR-01-047

	Jan - 2019	Feb - 2019	Mar - 2019	Apr - 2019	May - 2019	Jun - 2019	Jul - 2019	Aug - 2019	Sep - 2019	Oct - 2019
Common Equity	\$ 604,704,676	\$ 609,681,030	\$ 617,073,633	\$ 615,620,413	\$ 619,475,358	\$ 622,815,183	\$ 628,482,984	\$ 630,810,516	\$ 634,148,328	\$ 634,665,143
Long Term Debt	\$ 449,688,863	\$ 449,705,079	\$ 449,542,393	\$ 449,564,109	\$ 449,585,824	\$ 449,606,322	\$ 489,596,630	\$ 489,618,345	\$ 658,783,985	\$ 658,771,598
Short Term Debt	\$ 187,916,698	\$ 188,639,016	\$ 186,742,217	\$ 192,578,670	\$ 201,462,727	\$ 216,703,760	\$ 193,589,075	\$ 201,636,592	\$ 129,081,813	\$ 70,380,360

	Nov - 2019	Dec - 2019	Jan - 2020	Feb - 2020	Mar - 2020	Apr - 2020	May - 2020	Jun - 2020	Jul - 2020	Aug - 2020	Sep - 2020
\$	640,506,603	\$ 645,093,594	\$ 654,042,353	\$ 660,740,900	\$ 663,425,862	\$ 666,196,880	\$ 669,538,474	\$ 698,334,042	\$ 704,484,739	\$ 709,493,741	\$ 710,729,085
\$	658,782,594	\$ 658,806,823	\$ 658,828,154	\$ 658,852,382	\$ 658,876,611	\$ 658,900,840	\$ 658,925,068	\$ 658,949,297	\$ 658,973,526	\$ 658,966,688	\$ 728,776,359
\$	93,713,103	\$ 118,166,043	\$ 90,921,463	\$ 113,651,198	\$ 127,128,033	\$ 130,905,943	\$ 131,582,047	\$ 116,391,066	\$ 136,075,084	\$ 140,933,993	\$ 74,422,010

	Oct - 2020	Nov - 2020	Dec - 2020	Jan - 2021	Feb - 2021	Mar - 2021	Apr - 2021	May - 2021	Jun - 2021	Jul - 2021	Aug - 2021
	\$ 711,530,058	\$ 715,137,495	\$ 718,236,890	\$ 728,524,520	\$ 735,210,398	\$ 740,303,668	\$ 743,091,819	\$ 746,406,332	\$ 802,563,109	\$ 747,662,979	\$ 752,091,746
	\$ 728,788,878	\$ 728,784,494	\$ 678,796,137	\$ 678,975,045	\$ 678,998,723	\$ 679,022,401	\$ 679,046,079	\$ 679,069,757	\$ 679,093,435	\$ 678,413,477	\$ 678,454,851
	\$ 83,762,585	\$ 103,715,984	\$ 164,134,565	\$ 170,308,208	\$ 170,360,719	\$ 169,273,372	\$ 170,041,870	\$ 168,412,434	\$ 118,338,591	\$ 177,133,030	\$ 176,139,191

Sep - 2021	Oct - 2021	Nov - 2021	Dec - 2021	Jan - 2022	Feb - 2022	Mar - 2022	Apr - 2022	May - 2022	Jun - 2022	Jul - 2022
\$ 804,017,025	\$ 806,194,916	\$ 811,107,618	\$ 818,389,521	\$ 826,184,816	\$ 834,644,974	\$ 859,628,371	\$ 861,250,883	\$ 863,541,056	\$ 866,221,491	\$ 870,169,985
\$ 728,496,226	\$ 728,387,906	\$ 778,292,912	\$ 778,336,564	\$ 778,380,217	\$ 778,423,869	\$ 778,467,522	\$ 778,511,174	\$ 778,554,827	\$ 778,598,479	\$ 778,642,132
\$ 86,577,072	\$ 86,592,595	\$ 36,588,235	\$ 36,592,595	\$ 36,592,595	\$ 36,592,595	\$ 36,592,595	\$ 36,592,595	\$ 36,592,595	\$ 37,490,878	\$ 44,926,667

Aug - 2022	Sep - 2022	Oct - 2022	Nov - 2022	Dec - 2022
\$ 874,786,504	\$ 877,055,447	\$ 879,492,531	\$ 884,661,060	\$ 888,170,828
\$ 778,676,702	\$ 848,720,355	\$ 823,575,606	\$ 823,618,266	\$ 823,660,926
\$ 47,827,225	\$ 36,592,595	\$ 61,592,595	\$ 61,592,595	\$ 61,592,595