

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF DUKE ENERGY)
KENTUCKY, INC. FOR: 1) AN ADJUSTMENT OF) CASE NO.
THE NATURAL GAS RATES; 2) APPROVAL OF) 2021-00190
NEW TARIFFS, AND 3) ALL OTHER REQUIRED)
APPROVALS, WAIVERS, AND RELIEF)

**ATTORNEY GENERAL’S MOTION FOR LEAVE TO FILE CORRECTED
TESTIMONY OF LANE KOLLEN**

The intervenor, the Attorney General of the Commonwealth of Kentucky, through his Office of Rate Intervention (“OAG”), hereby moves the Commission for leave to file the attached corrected testimony of his revenue requirements expert, Mr. Lane Kollen, in the above-styled matter.

In support of this motion, counsel states that following the filing of his testimony on September 1, 2021, Mr. Kollen discovered an error in the presentation of Duke Energy Kentucky, Inc.’s capital structure as filed in Case No. 2018-00261 in comparison to its actual capital structure for calendar years 2019 and 2020. This table is found at p. 32 of Mr. Kollen’s Direct Testimony, and is further discussed therein beginning at page 31 through and including page 32. Accordingly, the OAG is submitting, contemporaneous with this motion, a corrected version of Mr. Kollen’s testimony to correctly depict the capital structure as filed in Case No. 2018-00261 and to correct the related references to the capital structure in the narrative testimony on pages 31-32. The changes do not affect the computations set forth in Mr. Kollen’s summary table on p. 4 and do not affect any other adjustments or revenue requirement calculations. There are no changes to Mr. Kollen’s exhibits or workpapers, except for the change in the referenced table.

WHEREFORE, counsel for OAG respectfully requests that the Commission grant his motion.

Respectfully submitted,

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ATTORNEY GENERAL



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Certificate of Service

Pursuant to the Commission's Order dated July 22, 2021 in Case No. 2020-00085, and in accord with all other applicable law, Counsel certifies that an electronic copy of the forgoing was served and filed by e-mail to the parties of record.

This 14th day of September, 2021



Assistant Attorney General