

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF DUKE ENERGY)	
KENTUCKY, INC. FOR (1) AN ADJUSTMENT OF)	
ELECTRIC RATES; (2) APPROVAL OF NEW)	CASE NO.
TARIFFS; (3) APPROVAL OF ACCOUNTING)	2022-00372
PRACTICES TO ESTABLISH REGULATORY)	
ASSETS AND LIABILITIES; AND (4) ALL OTHER)	
REQUIRED APPROVALS AND RELIEF)	

ORDER

On October 12, 2023, the Commission issued a final Order addressing the application of Duke Energy Kentucky, Inc. (Duke Kentucky) for approval of an adjustment of electric rates, tariff revisions as well as other appropriate or required approvals.¹ On November 1, 2023, Duke Kentucky filed for rehearing on the final Order issued in this matter. In response to Duke Kentucky’s rehearing petition, several parties to the case filed responses. On November 8, 2023, the Attorney General of the Commonwealth of Kentucky, by and through the Office of Rate Intervention (Attorney General) filed a response requesting that the Commission grant, in part and deny, in part, Duke Kentucky’s motion.² The Sierra Club also filed a response asking the Commission to

¹ The Application was deemed filed on Dec. 14, 2022.

² Attorney General’s Response to Duke Energy Kentucky, Inc.’s Petition for Rehearing (filed Nov. 8, 2023) at 1.

grant rehearing.³ Duke Kentucky filed a response in support of its petition for rehearing on November 13, 2023.⁴

The Commission issued an Order on November 21, 2023, granting, in part, and denying, in part, rehearing on several issues. On November 22, 2023, the Commission issued a procedural schedule for the rehearing portion of the proceeding.⁵

Duke Kentucky responded to two additional requests for information from Commission Staff⁶ as well as two requests for information from the Attorney General.⁷ On February 9, 2024, Duke Kentucky filed a request to submit the rehearing matter on the record. On that same day, the Attorney General requested an opportunity to brief the issues. The remaining parties in the matter, Walmart, Kroger and KBCA, filed requests for the matter to be submitted on the record.⁸ On February 15, 2024, the Commission granted the Attorney General's motion and issued a briefing schedule allowing for simultaneous initial and response briefs. On March 18, 2024, Duke Kentucky and the

³ Sierra Club's Response to Duke Energy Kentucky, Inc.'s Petition for Rehearing (Nov. 8, 2023) at 9.

⁴ Walmart, Kroger, and Kentucky Broadband Cable Association (KBCA) were also granted intervention in this matter. They did not file a response to the petition for rehearing.

⁵ Order (Ky. PSC Nov. 22, 2023).

⁶ Duke Kentucky's Response to Commission Staff's First Request for Information (Staff's First Request) (filed Dec. 22, 2023); Duke Kentucky's Response to Commission Staff's Second Request for Information (Staff's Second Request) (filed Jan. 26, 2024).

⁷ Duke Kentucky's Response to the Attorney General's First Request for Information (Attorney General's First Request) (filed Dec. 21, 2023); Duke Kentucky's Response to the Attorney General's Second Request for Information (Attorney General's Second Request) (filed Jan. 26, 2024).

⁸ KBCA's Letter requesting the matter be submitted on the record (filed Feb. 9, 2024); Walmart's Letter requesting the matter be submitted on the record (filed Feb. 9, 2024); Kroger's Letter requesting the matter be submitted on the record (filed Feb. 9, 2024); Sierra Club did not make a filing.

Attorney General each filed its respective initial brief. On April 1, 2024, Duke Kentucky filed a reply brief. The matter now stands for a decision on the record.

DISCUSSION AND RECOMMENDATION

On site Payment Locations

Duke Kentucky acknowledged that the utility had only one fee free payment location.⁹ In the final Order,¹⁰ the Commission ordered Duke Kentucky to maintain an office that is open five days a week for a total of 40 hours each week in which customers can make payments without having to pay a service fee and noted that the Erlanger facility could be adapted for this purpose.¹¹

In its petition for rehearing, Duke Kentucky argued that adaption of the Erlanger office would be “cost inefficient and burdensome.”¹² Duke Kentucky argued that it would prefer to offer different options as an alternative to the Commission’s Order. Duke Kentucky stated it is able and willing to arrange for multiple Kroger grocery stores to accept customer payments free of charge.¹³ The Kroger grocery stores will be located throughout the company’s service territory and typically operate ten hours a day, seven days a week.¹⁴ Duke Kentucky stated that these Kroger payment centers will be able to accept payments, communicate account balances, and provide customers with payment

⁹ Order (Ky. PSC Oct. 12, 2023) at 43; Hearing Video Transcript (HVT) of the May 11, 2023 Hearing at 15:00:05–15:00:56.

¹⁰ Order (Ky. PSC Oct. 12, 2023).

¹¹ Order (Ky. PSC Oct 12, 2023) at 44.

¹² Duke Kentucky’s Petition for Rehearing at 4.

¹³ Duke Kentucky’s Petition for Rehearing at 4.

¹⁴ Duke Kentucky’s Petition for Rehearing at 4.

amounts needed to avoid disconnection.¹⁵ As an alternative to the Kroger option, Duke Kentucky requested that the Commission convert the requirement in its Order to a requirement to allow Duke Kentucky to study the potential impacts to customers of such a proposal, such as it did in 2009.¹⁶

In response to additional requests for information, Duke Kentucky stated that it would have sixteen Kroger payment locations.¹⁷ Duke Kentucky provided the contract with its payment service provider and stated that, with 60 days written notice, the company can switch from a customer paid convenience fee to a client paid convenience fee.¹⁸ Duke Kentucky stated that upon issuance of approval from the Commission the utility would provide this notice to its service provider.¹⁹

The Attorney General's initial response to the petition for rehearing and the brief on rehearing did not address this issue.

Having reviewed the record and being otherwise sufficiently advised, the Commission finds that Duke Kentucky's request to allow for fee free Kroger payment locations instead of requiring Duke Kentucky to staff at least one fee free location in Kentucky is reasonable and should be granted. The Kroger stores are located across the Duke Kentucky service area and will provide more opportunities for customers to make fee free payments. Duke Kentucky should be required, as requested, to provide notice

¹⁵ Duke Kentucky's Petition for Rehearing at 4.

¹⁶ Duke Kentucky's Petition for Rehearing at 7-8.

¹⁷ Duke Kentucky's Response to Staff's First Post-Hearing Request, Item 7(b).

¹⁸ Duke Kentucky's Response to Staff's First Post-Hearing Request, Item 7(c).

¹⁹ Duke Kentucky's Response to Staff's First Post-Hearing Request, Item 7(c).

to the service provider to shift to a client paid convenience fee and provide notice to the Commission once this notice has been tendered and implementation complete.

Waiver of 807 KAR 5:006, Section 7(1)(a)(3) (Section 7) for Time of Use with Critical Peak Pricing (Rate RS-TOU-CPP)

In its application, Duke Kentucky requested a waiver of 807 KAR 5:006 Section 7(1)(a)(3) for the Time of Use with Critical Peak Pricing rate schedule (Rate RS-TOU-CPP).²⁰ In the final Order, the Commission denied the waiver.²¹ In the petition for rehearing, Duke Kentucky said the finding was unsupported and without the waiver, it could not implement Rate RS-TOU-CPP as currently approved without a significant billing reprogramming/software upgrade, which Duke Kentucky indicated would be cost prohibitive.²²

On rehearing, Duke Kentucky confirmed that meter reads, beginning and ending, for customers on Rate RS-TOU-CPP are not available on Duke Kentucky's website or on Duke Kentucky's printed bills.²³ For customers not billed through interval data, the meter reads are available on the customer's printed bill and bill images online.²⁴ Notwithstanding the lack of meter reads, Duke Kentucky argued that it still provides customers with enough information for the customer to understand and review their bills.²⁵ According to Duke Kentucky, since billing is calculated based on usage during designated

²⁰ Application (filed Dec. 14, 2022) at Direct Testimony of Bruce Sailors (Sailors Direct Testimony) at 17–18.

²¹ Order (Ky. PSC Oct. 12, 2023) at 89.

²² Duke Kentucky's Petition for Rehearing at 8-11.

²³ Duke Kentucky's Response to Staff's First Post-Hearing Request, Items 1-2.

²⁴ Duke Kentucky's Initial Brief (filed Mar. 18, 2024) at 7.

²⁵ Duke Kentucky's Initial Brief at 8.

time periods and not on the difference between the start and ending meter read, the beginning and end reads are not necessary.²⁶ In support of its position, Duke Kentucky provided the information related to the additional expense and man hours related to a software change.²⁷

The Attorney General did not address this issue in the rehearing brief or in the initial response to the rehearing petition.

Having reviewed the relevant record, the rehearing pleadings, and being otherwise sufficiently advised, the Commission finds that Duke Kentucky's request for waiver of 807 KAR 5:006, Section 7(1)(a)(3) is denied. The Commission acknowledges its ability to grant a deviation, and that Duke Kentucky desires to maintain its current software without revisions upgrades. However, the Commission may only grant a deviation for good cause shown. An officially promulgated administrative regulation is generally recognized as having the force of law and as typically elaborating the requirements of a law or policy.²⁸ The utility has the burden of demonstrating good cause for a waiver each time a waiver is requested. To support its request, Duke Kentucky points to having followed a Commission Order issued in a prior matter by requesting the waiver.²⁹ That Order, however, was issued in April 2020, thus four years plus have passed giving Duke Kentucky ample time to bring its electronic billing system into compliance with the

²⁶ Duke Kentucky's Response to Staff's First Post-Hearing Request, Item (1)(a).

²⁷ Duke Kentucky's Response to Staff's First Post-Hearing Request, Item (1)(b).

²⁸ Black's Law Dictionary (11th ed. 2019) (See Administrative rule); *Kearney v. University of Kentucky* 638 S.W.3d 385, 401 (Ky. 2022).

²⁹ Case No. 2019-00271 *Electronic Application of Duke Energy Kentucky, Inc. for 1) An Adjustment of the Electric Rates; 2) Approval of New Tariffs; 3) Approval of Accounting Practices to Establish Regulatory Assets and Liabilities; and 4) All Other Required Approvals and Relief* (Ky. PSC Apr. 27, 2020), Order at 60–61.

regulation. Moreover, the Order did not indicate that a waiver in that matter would mean a waiver in the future. In fact, the Order specifically indicated that a waiver in the matter was not intended to be granted in perpetuity so that the matter could be revisited as conditions change by Ordering Duke Kentucky to request a waiver in the future.³⁰

When asked initially about the billing information and in the testimony related to the request for waiver, Duke Kentucky witness Bruce L. Sailors initially stated that the beginning and ending meter reads would not be available; he then stated that “the beginning and ending meter readings are no longer relevant” and that the “customers will have even greater access to actual usage information”; however he then averred that “even though the Company is proposing not to include this information on the bill going forward, customers who desire that information will have the mean to access it themselves upon demand”.³¹ This was clearly an attempt to be dismissive and evasive in testimony. Although in the rehearing requests, Mr. Jacob Colley attempted to clarify the testimony;³² Mr. Sailors did not accurately portray the information available to someone participating in this rate of service. Based on the totality of the information provided, the Commission is unpersuaded that a customer could accurately understand or attempt to verify the rates and calculations on their bill based on the information provided to them. Duke Kentucky did not appear to understand, in asking for the waiver, what information the customer would have. The Commission will continue to consider

³⁰ Case No. 2019-00271, Apr. 27, 2020 Order at 60-61.

³¹ Duke Kentucky’s Petition for Rehearing at 9; Application, Sailors Direct Testimony at 18.

³² Duke Kentucky’s Response to Staff’s First Post-hearing Request, Items 1 and 2.

requests for waivers of this regulation in the future but will expect Duke Kentucky to present evidence that good cause exists to grant the waiver.

Effect of the Denial of the Waiver

As a result of the Commission's denial of the waiver of 807 KAR 5:006, Section 7(1)(a)(3), several issues raised by Duke Kentucky in its rehearing petition are moot. Duke Kentucky raised the issue of Rate RS-TOU-CPP Deferral and Rate RS-TOU-CPP as it relates to the final Order's Appendix B.³³ The Commission will not address these issues as they are now moot and the calculations in Appendix B reflect fair, just and reasonable rates excluding consideration of these issues.

Terminal Net Salvage Adjustment

In Duke Kentucky's petition for rehearing, Duke Kentucky argued that the Commission's use of KRS 278.264 to remove decommissioning costs from all generating asset depreciation rates conflicts with KRS 278.264 on its face, as KRS 278.264 applies to "fossil fuel fired combustion or steam generating sources" only.³⁴ According to Duke Kentucky, the Commission had previously allowed decommissioning costs in depreciation rates and as such, Duke Kentucky included the decommissioning costs in the depreciation rates in this application.³⁵ Duke Kentucky noted that, even with solar generation, there would be costs attributable to the decommissioning of that asset.³⁶

³³ Duke Kentucky's Petition for Rehearing at 22; Duke Kentucky's Petition for Rehearing at 24-25.

³⁴ Duke Kentucky's Initial Post-Hearing Brief at 10.

³⁵ Duke Kentucky's Initial Post-Hearing Brief at 10-11; *citing* Case No. 2017-00321, *Electronic Application of Duke Energy Kentucky, Inc. for: 1) An Adjustment of the Electric Rates; 2) Approval of an Environmental Compliance Plan and Surcharge Mechanism; 3) Approval of New Tariffs; 4) Approval of Accounting Practices to Establish Regulatory Assets and Liabilities; and 5) All Other Required Approvals and Relief* (Ky. PSC Apr. 13, 2018), Order at 27.

³⁶ Duke Kentucky's Initial Post-Hearing Brief at 11.

Duke Kentucky requested that the Commission, at a minimum, exclude only solar generation assets, resulting in a \$0.141 million revenue requirement increase.³⁷

Recognizing that the Commission has plenary authority to set rates, the Attorney General argued that Duke Kentucky did not provide any information that could not have been produced prior to the original hearing.³⁸ The Attorney General also argued that Duke Kentucky should not be allowed to recover decommissioning costs related to solar generation as part of depreciation rates.³⁹ The Attorney General alternately asked that escalation be removed from the decommissioning costs and the expense be recovered separately through rates as a standalone expense and not part of depreciation rates.⁴⁰

In response, Duke Kentucky argued that decommissioning costs are regularly included in depreciation rates and because the Commission relied on KRS 278.264 to remove the decommissioning costs, the removal should be limited to fossil fuel generation.⁴¹

Having reviewed the relevant record, the rehearing pleadings, and being otherwise sufficiently advised, the Commission finds that Duke Kentucky should be allowed to recover decommissioning costs for solar generation, resulting in a \$0.140 million revenue requirement increase. As Duke Kentucky pointed out, the Commission noted, in its

³⁷ Duke Kentucky's Initial Post-Hearing Brief at 12; *citing* Duke Kentucky's Response to the Attorney General's First Post-Hearing Request for Information, Item 3, including Attachments provided to Staff's Post-Hearing, Item 3.

³⁸ Attorney General's Initial Post-Hearing Brief at 5-6.

³⁹ Attorney General's Initial Post-Hearing Brief at 6.

⁴⁰ Attorney General's Initial Post-Hearing Brief at 7.

⁴¹ Duke Kentucky's Post- Hearing Reply Brief (filed Apr. 1, 2024) at 5-10.

rehearing Order that “KRS 278.264 does not apply to solar generation assets.”⁴² The Commission notes that the final adjustment amount of \$0.140 million is lower than Duke Kentucky’s proposed adjustment amount. The Commission used Duke Kentucky’s proposed rate of return (ROE) to calculate its adjustment, in keeping with the calculation for all other rate base adjustments.

Rate Case Disallowance:

In its petition for rehearing, Duke Kentucky objected to estimated rate case expenses in the amount of \$160,000 being removed from its rate case expense.⁴³ Duke Kentucky argued that, due to the timing of its expense updates and briefing schedule, estimated expenses were the only way to include the costs incurred after the hearing.⁴⁴ Duke Kentucky stated that the costs were for outside counsel hired to assist with the production of post-hearing data requests, preparation and filing of post-hearing briefs, and review of intervenor briefs.⁴⁵ Duke Kentucky alleged it did its best to attempt to provide the Commission accurate timely expense reports.⁴⁶ Duke Kentucky noted that if granted, the inclusion of this amount would result in a \$32,000 increase to the revenue requirement and requested further direction on how to handle estimated rate case

⁴² Duke Kentucky’s Initial Post-Hearing Brief at 10; *citing* Rehearing Order at 12.

⁴³ Duke Kentucky’s Petition for Rehearing at 21-22.

⁴⁴ Duke Kentucky’s Petition for Rehearing at 21-22.

⁴⁵ Duke Kentucky’s Petition for Rehearing at 21-22.

⁴⁶ Duke Kentucky’s Petition for Rehearing at 21-22.

expense in the future.⁴⁷ Duke Kentucky subsequently provided actual rate case expense information for outside counsel.⁴⁸

The Attorney General did make one request as to rate case expense;⁴⁹ however, the Attorney General did not brief the issue.

Having reviewed the relevant record, the rehearing pleadings, and being otherwise sufficiently advised, the Commission finds that Duke Kentucky should be able to recover the actual amount of outside counsel fees incurred after the hearing of \$159,826, the 5-year amortization of which is \$ 31,965.

In future cases, the Commission appreciates that rate case work is on-going throughout the pendency of the matter. Consequently, utilities may consider filing periodic updates of case expenses, including legal fees, until such time as an Order is issued, even if not requested in a Commission Staff request for information.

Other Issues:

In its petition for rehearing, Duke Kentucky stated that it appeared the Commission, when calculating rates included in Appendix B of the final Order included the Rider Environmental Surcharge Mechanism (ESM) as originally proposed by Duke Kentucky for roll-in to base rates. In the final Order, the Commission denied the roll-in proposal, which, therefore, reduced Duke Kentucky's forecasted test year revenue requirement increase.

⁴⁷ Duke Kentucky's Petition for Rehearing at 21-22.

⁴⁸ Duke Kentucky's Response to Staff's First Post-Hearing Request, Item 4.

⁴⁹ Attorney General's First Request, Item 4.

Having reviewed the relevant record, the rehearing pleadings, and being otherwise sufficiently advised, the Commission finds that the Rider ESM was not removed from the original calculated rates included in Appendix B of the final Order. Based on the findings mentioned herein and review of the record, the Commission finds that the rates set out in Appendix C reflect the appropriate calculations and are fair, just and reasonable rates. Additionally, pursuant to KRS 278.190, the Commission finds that within 45 days of the date of service of this Order, Duke Kentucky shall issue a refund to each customer all amounts collected from that customer in excess of the rates approved in this Order. The Commission also finds that within 60 days of the date of this Order, Duke Kentucky shall submit a written report to the Commission in which it describes its efforts to refund all monies collected in excess of the rates that are set forth in Appendix C to this Order.

IT IS THEREFORE ORDERED that:

1. The rates and charges, as set forth in Appendix C to this Order, are approved as fair, just and reasonable rates for Duke Kentucky and these rates and charges are approved for service rendered on and after the date of entry of this Order.
2. The typographical corrections set out in Appendix A are approved.
3. The Commission's October 12, 2023 final Order, as modified by the November 21, 2023 Order, is amended to reflect the modifications discussed in this Order.
4. All other provisions of the October 12, 2023 final Order, as modified by the November 21, 2023 Order, shall remain in full force and effect.
5. Within 20 days of the date of service of this Order, Duke Kentucky shall file with this Commission, using the Commission's electronic Tariff Filing System, revised

tariff sheets setting out the rates approved herein and reflecting that they were approved pursuant to this Order.

6. Within 45 days of the date of service of this Order, Duke Kentucky shall issue a refund to each customer all amounts collected from that customer in excess of the rates approved in this Order.

7. Within 60 days of the date of this Order, Duke Kentucky shall submit a written report to the Commission in which it describes its efforts to refund all monies collected in excess of the rates that are set forth in Appendix C to this Order.

8. Any documents filed with the Commission pursuant to ordering paragraph 7 shall be filed in the post-case documents in this case.

9. The Kroger fee free payment locations are approved as outlined in this Order.

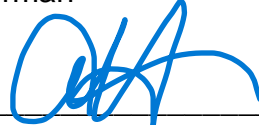
10. Within 14 days after notifying its payment servicer of the shift to client paid convenience fee, Duke Kentucky shall file notice of the notification of payment change to its servicers in post-case correspondence.

11. Within 14 days after the Kroger payment locations are available for fee free payments, Duke Kentucky shall file a notice of such in the post-case correspondence.

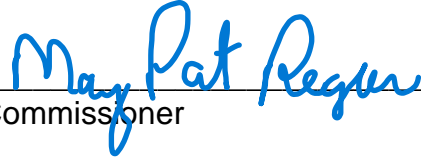
12. This case is closed and removed from the Commission's docket.

PUBLIC SERVICE COMMISSION

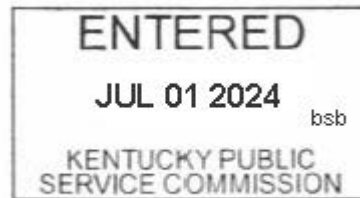
Chairman



Vice Chairman



Commissioner



ATTEST:



Executive Director

APPENDIX A

APPENDIX TO AN ORDER OF THE KENTUCKY PUBLIC SERVICE COMMISSION IN CASE NO. 2022-00372 DATED JUL 01 2024

The Commission finds the following typographical errors shall be corrected. The remainder of the errors cited by Duke Kentucky are errors related to items addressed in Orders subsequent to the final Order.

- 1) The following phrase on page 20, footnote 89 of the final Order should be stricken:

“Lastly, Duke Kentucky’s witnesses and consultants were generally unable to explain Duke Kentucky’s accounts receivable treatment and expenses were incurred to provide testimony on this topic.” See Hearing Video Transcript (HVT) of the March 10, 2023 Hearing at 16:25:33-17:03:55.”

The phrase should be replaced with the following:

“Lastly, Duke Kentucky’s witnesses and consultants were generally unable to explain Duke Kentucky’s accounts receivable treatment and expenses were incurred to provide testimony on this topic.” See Hearing Video Transcript (HVT) of the May 10, 2023 Hearing at 16:25:33–17:03:55.

- 2) The following phrase on Appendix A of the final Order should be stricken:

“Reduce Return on Equity from 10.35% to 9.55%”

The phrase should be replaced with the following:

“Reduce Return on Equity from 10.35% to 9.75%”

APPENDIX B

APPENDIX TO AN ORDER OF THE KENTUCKY PUBLIC SERVICE
COMMISSION IN CASE NO. 2022-00372 DATED JUL 01 2024

	<u>Amount (millions)</u>	
	<u>Final Order</u>	<u>Rehearing</u>
Base Rate Increase Requested by Duke Kentucky	75.177	75.177
Reverse Roll-In of ESM Projects to Base Rates	(3.290)	(3.290)
Base Rate Increase Requested by Duke Kentucky Without Roll-In of ESM	<u>71.887</u>	<u>71.887</u>
Effects on Base Rate Increase of Rate Base Adjustments		
Reduce Fuel and Lime Inventories For Amounts Financed By Vendors	(0.604)	(0.604)
Correct Error in the Accumulated Depreciation Reserve Balance	(0.011)	(0.011)
Reduce Cash Working Capital to Correct Revenue Lag Error in Lead/Lag Study	(0.460)	(0.460)
Reflect Changes Due to Lower Depr. Expense - 2041 East Bend Retirement	0.245	0.245
Reflect Changes Due to Lower Depr. Expense - No Terminal Net Salvage	0.135	0.132
Effects on Base Rate Increase of Operating Income Adjustments		
Correct Error to Reflect Amortization of DEBS EDIT	(0.016)	(0.016)
Amortize Remaining Rate Case Expenses from Case No. 2019-00271 Over 5 Years	(0.043)	(0.043)
Reduce Property Tax Expense	(2.062)	(2.062)
Reduce Depreciation Expense to Reflect Revised Retirement Date for East Bend	(10.452)	(10.452)
Reduce Depreciation Expense to Remove Terminal Net Salvage	(5.775)	(5.631)
Reduce Rate Case Expense	(0.102)	(0.070)
Reduce Revenues from Non-recurring Charges	0.022	0.022
Reduce Revenues from Pole-Attachment Charges	0.038	0.038
Effects on Base Rate Increase of Rate of Return Adjustments		
Modify Capital Structure	(0.392)	(0.392)
Reduce Return on Equity from 10.35% to 9.75%	(4.912)	(4.912)
Total Adjustments to Request	<u>(27.679)</u>	<u>(27.506)</u>
Base Rate Increase After Adjustments	<u>47.498</u>	<u>47.671</u>
Difference		0.172

APPENDIX C

APPENDIX TO AN ORDER OF THE KENTUCKY PUBLIC SERVICE
COMMISSION IN CASE NO. 2022-00372 DATED JUL 01 2024

The following rates and charges are prescribed for the customers in the area served by Duke Energy Kentucky, Inc. All other rates and charges not specifically mentioned herein shall remain the same as those in effect under the authority of the Commission prior to the effective date of this Order.

RATE RS
RESIDENTIAL SERVICE

Customer Charge per month	\$ 13.00
Energy Charge per kWh: All kWh per month	\$ 0.097376

RATE DS
SERVICE AT SECONDARY DISTRIBUTION VOLTAGE

Customer Charge per month: Single Phase Service	\$ 15.00
Three Phase Service	\$ 30.00
Demand Charge per kW: First 15 kW	\$ 0.00
Additional kW	\$ 10.05
Energy Charge per kWh: First 6,000 kWh	\$ 0.099629
Next 300 kWh/kW	\$ 0.061833
Additional kWh	\$ 0.050953
Non-Church Cap Rate per kWh	\$ 0.289147
Church Cap Rate per kWh	\$ 0.177510

RATE DT
TIME-OF-DAY RATE FOR SERVICE AT DISTRIBUTION VOLTAGE

Customer Charge per month: Single Phase	\$ 63.50
Three Phase	\$ 127.00
Primary Voltage Service	\$ 138.00
Demand Charge per kW:	

Summer on-peak	\$	13.99
Winter on-peak	\$	13.24
Off-peak	\$	1.26
Distribution	\$	5.77
Energy Charge per kWh:		
Summer on-peak	\$	0.045590
Winter on-peak	\$	0.043586
Off-peak	\$	0.037602
Primary Service Discount:		
Metering of on-peak billing demand per kW:		
First 1,000 kW	\$	(0.71)
Additional kW	\$	(0.55)

RATE EH
OPTIONAL RATE FOR ELECTRIC SPACE HEATING

Winter Period

Customer Charge per month:		
Single Phase Service	\$	15.00
Three Phase Service	\$	30.00
Primary Voltage Service	\$	117.00
Energy Charge per kWh:		
All kWh per month	\$	0.077270

RATE SP
SEASONAL SPORTS SERVICE

Customer Charge per month:	\$	15.00
Energy Charge per kWh:		
All kWh per month	\$	0.121784

RATE GS-FL
OPTIONAL UNMETERED GENERAL SERVICE RATE FOR SMALL FIXED LOADS

Base Rate per kWh:		
Load range of 540 to 720 hours per month	\$	0.101540
Loads less than 540 hours per month	\$	0.116728
Minimum per Fixed Load Location per month:	\$	3.60

RATE DP
SERVICE AT PRIMARY DISTRIBUTION VOLTAGE

Customer Charge per month:

Primary Voltage Service (12.5 or 34.5 kV)	\$ 117.00
Demand Charge per kW:	
All kW	\$ 9.28
Energy Charge per kWh:	
First 300 kWh/kW	\$ 0.061540
Additional kWh	\$ 0.052264
Cap Rate kWh	\$ 0.282546

RATE TT
TIME-OF-DAY RATE FOR SERVICE AT TRANSMISSION VOLTAGE

Customer Charge per month:	\$ 500.00
Demand Charge per kW:	
Summer on-peak	\$ 9.02
Winter on-peak	\$ 7.40
Off-peak	\$ 1.37
Energy Charge per kWh:	
Summer on-peak	\$ 0.056475
Winter on-peak	\$ 0.053988
Off-peak	\$ 0.046548

RIDER GSS
GENERATION SUPPORT SERVICE

Administrative Charge:	\$ 50.00
Monthly Transmission and Distribution Reservation Charge (per kW):	
Rate DS – Secondary Distribution Service	\$ 6.209222
Rate DT – Distribution Service	\$ 7.855088
Rate DP – Primary Distribution Service	\$ 8.173019
Rate TT – Transmission Service	\$ 3.267552

RATE SL
STREET LIGHTING SERVICE

Base Rate per Unit per Month:

OVERHEAD DISTRIBUTION AREA

Standard Fixture (Cobra Head)

Mercury Vapor:

7,000 Lumen	\$ 10.22
7,000 Lumen (Open Refractor)	\$ 8.57
10,000 Lumen	\$ 11.84
21,000 Lumen	\$ 15.90

Metal Halide:

14,000 Lumen	\$ 10.22
--------------	----------

20,500 Lumen	\$	11.84
36,000 Lumen	\$	15.90
Sodium Vapor:		
9,500 Lumen	\$	11.24
9,500 Lumen (Open Refractor)	\$	8.46
16,000 Lumen	\$	12.30
22,000 Lumen	\$	15.95
27,500 Lumen	\$	15.95
50,000 Lumen	\$	21.56
Decorative Fixtures		
Sodium Vapor:		
9,500 Lumen (Rectilinear)	\$	13.96
22,000 Lumen (Rectilinear)	\$	17.33
50,000 Lumen (Rectilinear)	\$	23.04
50,000 Lumen (Setback)	\$	34.10
<u>UNDERGROUND DISTRIBUTION AREA</u>		
Standard Fixture (Cobra Head)		
Mercury Vapor:		
7,000 Lumen	\$	10.41
7,000 Lumen (Open Refractor)	\$	8.57
10,000 Lumen	\$	12.06
21,000 Lumen	\$	16.30
Metal Halide:		
14,000 Lumen	\$	10.41
20,500 Lumen	\$	12.06
36,000 Lumen	\$	16.30
Sodium Vapor:		
9,500 Lumen	\$	11.24
9,500 Lumen (Open Refractor)	\$	8.58
16,000 Lumen	\$	12.26
22,000 Lumen	\$	15.95
27,500 Lumen	\$	16.01
50,000 Lumen	\$	21.56
Decorative Fixture:		
Mercury Vapor:		
7,000 Lumen (Town & Country)	\$	10.76
7,000 Lumen (Holophane)	\$	13.48
7,000 Lumen (Gas Replica)	\$	47.62
7,000 Lumen (Granville)	\$	10.88
7,000 Lumen (Aspen)	\$	19.46

Metal Halide:		
14,000 Lumen (Traditionaire)	\$	10.75
14,000 Lumen (Granville Acorn)	\$	19.46
14,000 Lumen (Gas Replica)	\$	30.75
14,500 Lumen (Gas Replica)	\$	30.75

Sodium Vapor:		
9,500 Lumen (Town & Country)	\$	15.59
9,500 Lumen (Holophane)	\$	16.89
9,500 Lumen (Rectilinear)	\$	12.76
9,500 Lumen (Gas Replica)	\$	32.69
9,500 Lumen (Aspen)	\$	19.66
9,500 Lumen (Traditionaire)	\$	15.59
9,500 Lumen (Granville Acorn)	\$	19.66
22,000 Lumen (Rectilinear)	\$	17.42
50,000 Lumen (Rectilinear)	\$	23.12
50,000 Lumen (Setback)	\$	34.10

POLE CHARGES

Pole Description:

Wood:

17 Foot (Wood Laminated)	\$	6.25
30 Foot	\$	6.17
35 Foot	\$	6.25
40 Foot	\$	7.48

Aluminum:

12 Foot (Decorative)	\$	16.98
28 Foot	\$	9.84
28 Foot (Heavy Duty)	\$	9.95
30 Foot (Anchor Base)	\$	19.66

Fiberglass:

17 Foot	\$	6.25
12 Foot (Decorative)	\$	18.26
30 Foot (Bronze)	\$	11.88
35 Foot (Bronze)	\$	12.21

Steel:

27 Foot (11 gauge)	\$	16.05
27 Foot (3 gauge)	\$	23.69

RATE TL
TRAFFIC LIGHTING SERVICE

Base Rate per kWh:
Energy only \$ 0.056047

RATE UOLS
UNMETERED OUTDOOR LIGHTING ELECTRIC SERVICE

Base Rate per kWh:
All kWh per month \$ 0.055216

RATE LED
LED OUTDOOR LIGHTING ELECTRIC SERVICE

Base Rate per kWh:
All kWh per month \$ 0.056957

Monthly Maintenance and Fixture Charge Per Unit Per Month
Fixtures:

	<u>Fixture</u>	<u>Maintenance</u>
50W Neighborhood	\$ 4.15	\$ 2.90
50W Neighborhood with Lens	\$ 4.20	\$ 2.90
50W Standard LED	\$ 3.84	\$ 2.90
70W Standard LED	\$ 4.22	\$ 2.90
110W Standard LED	\$ 4.77	\$ 2.90
150W Standard LED	\$ 4.83	\$ 2.90
220W Standard LED	\$ 6.31	\$ 3.54
280W Standard LED	\$ 6.36	\$ 3.54
50W Acorn LED	\$ 11.71	\$ 2.90
50W Deluxe Acorn LED	\$ 13.05	\$ 2.90
70W LED Open Deluxe Acorn	\$ 13.44	\$ 2.90
50W Traditional LED	\$ 6.31	\$ 2.90
50W Open Traditional LED	\$ 6.56	\$ 2.90
50W Mini Bell LED	\$ 12.01	\$ 2.90
50W Enterprise LED	\$ 11.53	\$ 2.90
70W Sanibel LED	\$ 14.66	\$ 2.90
150W Sanibel LED	\$ 15.28	\$ 2.90
150W LED Teardrop	\$ 18.36	\$ 2.90
50W LED Teardrop Pedestrian	\$ 15.01	\$ 2.90
220W LED Shoebox	\$ 11.39	\$ 3.54
420W LED Shoebox	\$ 16.92	\$ 3.54
530W LED Shoebox	\$ 19.49	\$ 3.54
150W Clermont LED	\$ 20.04	\$ 2.90
130W Flood LED	\$ 7.20	\$ 2.90
260W Flood LED	\$ 11.24	\$ 3.54

50W Monticello LED	\$ 13.49	\$ 2.90
50W Mitchell Finial	\$ 12.85	\$ 2.90
50W Mitchell Ribs, Bands, and Medallions LED	\$ 14.04	\$ 2.90
50W Mitchell Top Hat LED	\$ 12.85	\$ 2.90
50W Mitchell Top Hat with Ribs, Bands, and Medallions LED	\$ 14.04	\$ 2.90
50W Open Monticello LED	\$ 13.44	\$ 2.90
150W LED Shoebox	\$ 10.48	\$ 2.90
50W Sanibel LED	\$ 13.90	\$ 2.90
40W Acorn No Finial LED	\$ 11.20	\$ 2.90
50W Ocala Acorn LED	\$ 6.71	\$ 2.90
50W Deluxe Traditional LED	\$ 12.82	\$ 2.90
30W Town & Country LED	\$ 5.35	\$ 2.90
30W Open Town & Country LED	\$ 5.09	\$ 2.90
150W Enterprise LED	\$ 11.45	\$ 2.90
220W Enterprise LED	\$ 11.78	\$ 3.54
50W Clermont LED	\$ 18.68	\$ 2.90
30W Gaslight Replica LED	\$ 21.30	\$ 2.90
50W Cobra LED	\$ 4.17	\$ 2.90
70W Cobra LED	\$ 4.33	\$ 2.90

Monthly Pole Charges Per Unit Per Month:

Style A 12 Ft Long Anchor Base Top Tenon Aluminum	\$ 9.34
Style A 15 Ft Long Direct Buried Top Tenon Aluminum	\$ 8.69
Style A 15 Ft Long Anchor Base Top Tenon Aluminum	\$ 10.83
Style A 18 Ft Long Direct Buried Top Tenon Aluminum	\$ 8.90
Style A 17 Ft Long Anchor Base Top Tenon Aluminum	\$ 11.55
Style A 25 Ft Long Direct Buried Top Tenon Aluminum	\$ 11.75
Style A 22 Ft Long Anchor Base Top Tenon Aluminum	\$ 14.57
Style A 30 Ft Long Direct Buried Top Tenon Aluminum	\$ 13.35
Style A 27 Ft Long Anchor Base Top Tenon Aluminum	\$ 19.48
Style A 35 Ft Long Direct Buried Top Tenon Aluminum	\$ 15.49
Style A 32 Ft Long Anchor Base Top Tenon Aluminum	\$ 19.99
Style A 41 Ft Long Direct Buried Top Tenon Aluminum	\$ 18.98
Style B 12 Ft Long Anchor Base Post Top Aluminum	\$ 10.61
Style C 12 Ft Long Anchor Base Post Top Aluminum	\$ 12.91
Style C 12 Ft Long Anchor Base Davit Steel	\$ 15.64
Style C 14 Ft Long Anchor Base Top Tenon Steel	\$ 14.75
Style C 21 Ft Long Anchor Base Davit Steel	\$ 32.96
Style C 23 Ft Long Anchor Base Boston Harbor Steel	\$ 38.27
Style D 12 Ft Long Anchor Base Breakaway Aluminum	\$ 12.32
Style E 12 Ft Long Anchor Base Post Top Aluminum	\$ 12.91
Style F 12 Ft Long Anchor Base Post Top Aluminum	\$ 15.74
Legacy Style 39 Ft Direct Buried Single or Twin Side Mount Aluminum Satin Finish	\$ 20.92

Legacy Style 27 Ft Long Anchor Base Side Mount Aluminum Pole Satin Finish Breakaway	\$ 20.45
Legacy Style 33 Ft Long Anchor Base Side Mount Aluminum Pole Satin Finish Breakaway	\$ 21.38
Legacy Style 37 Ft Long Anchor Base Side Mount Aluminum Pole Satin Finish	\$ 23.61
30' Class 7 Wood Pole	\$ 6.48
35' Class 5 Wood Pole	\$ 7.24
40' Class 4 Wood Pole	\$ 8.21
45' Class 4 Wood Pole	\$ 8.55
15' Style A - Fluted - for Shroud - Aluminum Direct Buried Pole	\$ 10.05
20' Style A - Fluted - for Shroud - Aluminum Direct Buried Pole	\$ 10.54
15' Style A - Smooth - for Shroud - Aluminum Direct Buried Pole	\$ 8.69
20' Style A - Smooth - for Shroud - Aluminum Direct Buried Pole	\$ 10.26
21' Style A - Fluted - Direct Buried	\$ 14.37
30' Style A - Transformer Base - Anchor Base	\$ 21.78
35' Style A - Transformer Base - Anchor Base	\$ 24.53
19' Style A - Breakaway - Direct Buried	\$ 19.55
24' Style A - Breakaway - Direct Buried	\$ 20.69
27' Style A - Breakaway - Direct Buried	\$ 19.79
32' Style A - Breakaway - Direct Buried	\$ 20.26
37' Style A - Breakaway - Direct Buried	\$ 21.56
42' Style A - Breakaway - Direct Buried	\$ 22.29
17' Style B - Anchor Base	\$ 15.04
17' Style C - Post Top - Anchor Base	\$ 16.22
17' Style C - Davit - Anchor Base	\$ 25.65
17' Style C - Boston Harbor - Anchor Base	\$ 25.02
25' Style D - Boston Harbor - Anchor Base	\$ 29.17
50' Wood - Direct Buried	\$ 10.64
55' Wood - Direct Buried	\$ 11.21
18' Style C - Breakaway - Direct Buried	\$ 22.18
17' Wood Laminated	\$ 6.25
12' Aluminum (decorative)	\$ 16.98
28' Aluminum	\$ 9.84
28' Aluminum (heavy duty)	\$ 9.95
30' Aluminum (anchor base)	\$ 19.66
17' Fiberglass	\$ 6.25
12' Fiberglass (decorative)	\$ 18.26
30' Fiberglass (bronze)	\$ 11.88
35' Fiberglass (bronze)	\$ 12.21
27' Steel (11 gauge)	\$ 16.05
27' Steel (3 gauge)	\$ 23.69

Shroud – Standard Style for anchor base poles	\$	2.71
Shroud – Style B Pole for smooth and fluted poles	\$	6.44
Shroud – Style C Pole for smooth and fluted poles	\$	8.05
Shroud – Style D Pole for smooth and fluted poles	\$	9.93
Shroud - Style B - Assembly	\$	8.42
Shroud - Style C - Assembly	\$	9.89
Shroud - Style D – Assembly	\$	12.06
Shroud - Style Standard - Assembly 6"/15"	\$	4.71
Shroud - Style Standard - Assembly 6"/18"	\$	5.12

Pole Foundation Per Month Per Unit:

Flush – Pre-fabricated – Style A Pole	\$	13.30
Flush – Pre-fabricated – Style B Pole	\$	12.28
Flush – Pre-fabricated – Style C Pole	\$	13.17
Flush – Pre-fabricated – Style E Pole	\$	12.28
Flush – Pre-fabricated – Style F Pole	\$	12.28
Flush – Pre-fabricated – Style D Pole	\$	12.28
Reveal – Pre-fabricated – Style A Pole	\$	18.73
Reveal – Pre-fabricated – Style B Pole	\$	14.90
Reveal – Pre-fabricated – Style C Pole	\$	15.46
Reveal – Pre-fabricated – Style D Pole	\$	15.46
Reveal – Pre-fabricated – Style E Pole	\$	15.46
Reveal – Pre-fabricated – Style F Pole	\$	15.46
Screw-in Foundation	\$	7.96

Brackets Per Month Per Unit:

14 inch bracket – wood pole – side mount	\$	1.93
4 foot bracket – wood pole – side mount	\$	2.16
6 foot bracket – wood pole – side mount	\$	2.13
8 foot bracket – wood pole – side mount	\$	2.89
10 foot bracket – wood pole – side mount	\$	4.77
12 foot bracket – wood pole – side mount	\$	4.34
15 foot bracket – wood pole – side mount	\$	5.07
4 foot bracket – metal pole – side mount	\$	5.14
6 foot bracket – metal pole – side mount	\$	5.21
8 foot bracket – metal pole – side mount	\$	6.47
10 foot bracket – metal pole – side mount	\$	6.82
12 foot bracket – metal pole – side mount	\$	6.23
15 foot bracket – metal pole – side mount	\$	7.44
18 inch bracket – metal pole – double flood mount –top mount	\$	2.07
14 inch bracket – metal pole – single mount – top tenon	\$	2.19
14 inch bracket – metal pole – double mount – top tenon	\$	2.37
14 inch bracket – metal pole – triple mount –		

top tenon	\$	2.52
14 inch bracket – metal pole – quad mount – top tenon	\$	2.63
6 foot – metal pole – single – top tenon	\$	4.87
6 foot – metal pole – double – top tenon	\$	6.17
4 foot – Boston Harbor – top tenon	\$	7.06
6 foot – Boston Harbor – top tenon	\$	7.43
12 foot – Boston Harbor Style C pole double mount – top tenon	\$	12.71
4 foot – Davit arm – top tenon	\$	6.44
18 inch – Cobra head fixture for wood pole	\$	1.82
18 inch – Flood light for wood pole	\$	2.01
18" Metal - Flood - Bullhorn - Top Tenon	\$	2.48
4' Transmission - Top Tenon	\$	9.12
10' Transmission - Top Tenon	\$	10.51
15' Transmission - Top Tenon	\$	11.56
18" Transmission - Flood - Top Tenon	\$	4.86
3' Shepherds Crook - Single - Top Tenon	\$	4.61
3' Shepherds Crook w/ Scroll - Single - Top Tenon	\$	5.11
3' Shepherds Crook - Double - Top Tenon	\$	6.52
3' Shepherds Crook w/ Scroll - Double - Top Tenon	\$	7.33
3' Shepherds Crook w/ Scroll & Festoon - Single Top Tenon	\$	5.35
3' Shepherds Crook w/ Scroll - Wood - Top Tenon	\$	6.38
17" Masterpiece - Top Tenon - Double Post Mount - Top Tenon	\$	5.09
Wiring Equipment Per Month Per Unit:		
Secondary Pedestal (cost per unit)	\$	2.47
Handhole (cost per unit)	\$	3.54
Pullbox	\$	8.98
6AL DUPLEX and Trench (cost per foot)	\$	1.12
6AL DUPLEX and Trench and conduit (cost per foot)	\$	1.30
6AL DUPLEX with existing conduit (cost per foot)	\$	0.82
6AL DUPLEX and Bore with conduit (cost per foot)	\$	2.79
6AL DUPLEX OH wire (cost per foot)	\$	2.62

RATE NSU
STREET LIGHTING SERVICE - NONSTANDARD UNITS

Rate per Unit per Month:

Company Owned

Boulevard Units Served Underground:

2,500 Lumen Incandescent - Series	\$	13.19
2,500 Lumen Incandescent - Multiple	\$	10.30

Holophane Decorative Served Underground:
 10,000 Lumen Mercury Vapor on Fiberglass Pole \$ 24.04

Street Lighting Served Overhead:
 2,500 Lumen Incandescent \$ 10.21
 2,500 Lumen Mercury Vapor \$ 9.61
 21,000 Lumen Mercury Vapor \$ 15.44

Customer Owned

Steel Boulevard Units Served Underground:
 2,500 Lumen Incandescent - Series \$ 7.82
 2,500 Lumens Incandescent - Multiple \$ 9.95

RATE SC
STREET LIGHTING SERVICE – CUSTOMER OWNED

Base Rate per Unit per Month:

Standard Fixture (Cobra Head):

Mercury Vapor:

7,000 Lumen \$ 6.08
 10,000 Lumen \$ 7.77
 21,000 Lumen \$ 10.80

Metal Halide:

14,000 Lumen \$ 6.08
 20,500 Lumen \$ 7.77
 36,000 Lumen \$ 10.80

Sodium Vapor:

9,500 Lumen \$ 7.23
 16,000 Lumen \$ 8.09
 22,000 Lumen \$ 8.92
 27,500 Lumen \$ 8.92
 50,000 Lumen \$ 12.19

Decorative Fixture:

Mercury Vapor:

7,000 Lumen (Holophane) \$ 7.70
 7,000 Lumen (Town & Country) \$ 7.63
 7,000 Lumen (Gas Replica) \$ 7.70
 7,000 Lumen (Aspen) \$ 7.70

Metal Halide:

14,000 Lumen (Traditionaire) \$ 7.63

14,000 Lumen (Granville Acorn)	\$	7.77
14,000 Lumen (Gas Replica)	\$	7.77

Sodium Vapor:

9,500 Lumen (Town & Country)	\$	7.12
9,500 Lumen (Traditionaire)	\$	7.12
9,500 Lumen (Granville Acorn)	\$	7.43
9,500 Lumen (Rectilinear)	\$	7.12
9,500 Lumen (Aspen)	\$	7.43
9,500 Lumen (Holophane)	\$	7.43
9,500 Lumen (Gas Replica)	\$	7.43
22,000 Lumen (Rectilinear)	\$	9.44
50,000 Lumen (Rectilinear)	\$	12.61

Pole Description:

Wood:

30 Foot	\$	6.17
35 Foot	\$	6.25
40 Foot	\$	7.48

Customer Owned and Maintained Units per kWh	\$	0.055216
---	----	----------

RATE SE
STREET LIGHTING SERVICE – OVERHEAD EQUIVALENT

Base Rate per Unit per Month:

Decorative Fixtures:

Mercury Vapor:

7,000 Lumen (Town & Country)	\$	10.49
7,000 Lumen (Holophane)	\$	10.53
7,000 Lumen (Gas Replica)	\$	10.53
7,000 Lumen (Aspen)	\$	10.53

Metal Halide:

14,000 Lumen (Traditionaire)	\$	10.49
14,000 Lumen (Granville Acorn)	\$	10.53
14,000 Lumen (Gas Replica)	\$	10.53

Sodium Vapor:

9,500 Lumen (Town & Country)	\$	11.35
9,500 Lumen (Holophane)	\$	11.52
9,500 Lumen (Rectilinear)	\$	11.35
9,500 Lumen (Gas Replica)	\$	11.51
9,500 Lumen (Aspen)	\$	11.51
9,500 Lumen (Traditionaire)	\$	11.35

9,500 Lumen (Granville Acorn)	\$	11.51
22,000 Lumen (Rectilinear)	\$	16.37
50,000 Lumen (Rectilinear)	\$	21.78
50,000 Lumen (Setback)	\$	21.78

SCHEDULE RTP
REAL-TIME PRICING PROGRAM

Energy Delivery Charge (Credit) per kW per hour from CBL		
Secondary Service	\$	0.020034
Primary Service	\$	0.016479
Transmission Service	\$	0.006915
Program Charge per billing period	\$	183.00

*Angela M Goad
Assistant Attorney General
Office of the Attorney General Office of Rate
700 Capitol Avenue
Suite 20
Frankfort, KENTUCKY 40601-8204

*Joe F. Childers
Childers & Baxter PLLC
300 Lexington Building, 201 West Sho
Lexington, KENTUCKY 40507

*Larisa Vaysman
Duke Energy Kentucky, Inc.
139 East Fourth Street
Cincinnati, OH 45201

*Carrie H Grundmann
Spilman Thomas & Battle, PLLC
110 Oakwood Drive, Suite 500
Winston-Salem, NORTH CAROLINA 27103

*John G Horne, II
Office of the Attorney General Office of Rate
700 Capitol Avenue
Suite 20
Frankfort, KENTUCKY 40601-8204

*Larry Cook
Assistant Attorney General
Office of the Attorney General Office of Rate
700 Capitol Avenue
Suite 20
Frankfort, KENTUCKY 40601-8204

*Debbie Gates
Duke Energy Kentucky, Inc.
139 East Fourth Street
Cincinnati, OH 45201

*Joshua Smith
Sierra Club
2101
Webster St. , Suite 1300
Oakland, CALIFORNIA 94612

*Maria-Laura Coltre
Sheppard Mullin Richter & Hampton LLP
2099 Pennsylvania Avenue NW, Suite 1
Washington, DISTRICT OF COLUMBIA 20006

*Elizabeth Brama
Taft Stettinius & Hollister LLP
1717 Dixie Highway, Suite 340
Covington, KENTUCKY 41011-4707

*Kate Huddleston
Sierra Club Environmental Law Program
2101 Webster Street
Suite 1300
Oakland, CALIFORNIA 94612

*J. Michael West
Office of the Attorney General Office of Rate
700 Capitol Avenue
Suite 20
Frankfort, KENTUCKY 40601-8204

*Hannah Wigger
Sheppard Mullin Richter & Hampton LLP
2099 Pennsylvania Avenue NW, Suite 1
Washington, DISTRICT OF COLUMBIA 20006

*Honorable Kurt J Boehm
Attorney at Law
Boehm, Kurtz & Lowry
36 East Seventh Street
Suite 1510
Cincinnati, OHIO 45202

*Minna Sunderman
Duke Energy Kentucky, Inc.
139 East Fourth Street
Cincinnati, OH 45201

*James W Gardner
Sturgill, Turner, Barker & Moloney, PLLC
333 West Vine Street
Suite 1400
Lexington, KENTUCKY 40507

*Kristin Henry
Staff Attorney
Sierra Club Environmental Law Program
2101 Webster Street
Suite 1300
Oakland, CALIFORNIA 94612

*Paul Werner
Sheppard Mullin Richter & Hampton LLP
2099 Pennsylvania Avenue NW, Suite 1
Washington, DISTRICT OF COLUMBIA 20006

*Jody Kyler Cohn
Boehm, Kurtz & Lowry
36 East Seventh Street
Suite 1510
Cincinnati, OHIO 45202

*Duke Energy Kentucky, Inc.
139 East Fourth Street
Cincinnati, OH 45202

*Rocco O D'Ascenzo
Duke Energy Kentucky, Inc.
139 East Fourth Street
Cincinnati, OH 45201

*Rebecca C. Price
Sturgill, Turner, Barker & Moloney
155 East Main Street
Lexington, KENTUCKY 40507

*Sarah Lawler
Duke Energy Kentucky, Inc.
139 East Fourth Street
Cincinnati, OH 45201

*Steven W Lee
Spilman Thomas & Battle, PLLC
1100 Brent Creek Blvd., Suite 101
Mechanicsburg, PENNSYLVANIA 17050

*M. Todd Osterloh
Sturgill, Turner, Barker & Moloney, PLLC
333 West Vine Street
Suite 1400
Lexington, KENTUCKY 40507

*Valerie T. Herring
Attorney
Taft Stettinius & Hollister LLP
2200 IDS Center
80 South 8th Street
Minneapolis, MINNESOTA 55402-215