

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

JOINT APPLICATION OF DUKE ENERGY)	
CORPORATION, CINERGY CORP., DUKE)	
ENERGY OHIO, INC., DUKE ENERGY)	
KENTUCKY, INC., DIAMOND ACQUISITION)	CASE NO.
CORPORATION, AND PROGRESS ENERGY,)	2011-00124
INC. FOR APPROVAL OF THE INDIRECT)	
TRANSFER OF CONTROL OF DUKE ENERGY)	
KENTUCKY, INC.)	

COMMISSION STAFF'S SECOND INFORMATION REQUEST
TO JOINT APPLICANTS

Duke Energy Corporation ("Duke Energy"), Cinergy Corp. ("Cinergy"), Duke Energy Ohio, Inc. ("Duke Ohio"), Duke Energy Kentucky, Inc. ("Duke Kentucky"), Diamond Acquisition Corporation ("Diamond"), and Progress Energy, Inc. ("Progress"), (Collectively "Joint Applicants") pursuant to 807 KAR 5:001, are to file with the Commission the original and 10 copies of the following information, with a copy to all parties of record. The information requested herein is due no later than July 5, 2011. Responses to requests for information shall be appropriately bound, tabbed and indexed. Each response shall include the name of the witness responsible for responding to the questions related to the information provided.

Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the person supervising the preparation of the response on behalf of the entity that the response is true and

accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Joint Applicants shall make timely amendment to any prior response if they obtain information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which Joint Applicants fail or refuse to furnish all or part of the requested information, Joint Applicants shall provide a written explanation of the specific grounds for their failure to completely and precisely respond.

Careful attention shall be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request.

Each copy of the information requested should be placed in a bound volume with each item tabbed. When a number of sheets are required for an item, each sheet should be appropriately indexed, for example, Item 1(a), Sheet 2 of 6. Include with each response the name of the witness who will be responsible for responding to questions relating to the information provided. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request.

1. Explain in detail any legal impediments to jointly dispatching the generating units owned by the following entities:
 - a. Duke Kentucky and Duke Ohio;
 - b. Duke Kentucky and Duke Energy Indiana, Inc. ("Duke Indiana");

- c. Duke Kentucky, Duke Ohio and Duke Indiana.

The explanation should identify any legal impediments by citing to the applicable statutes, regulations, rules, and judicial and administrative decisions.

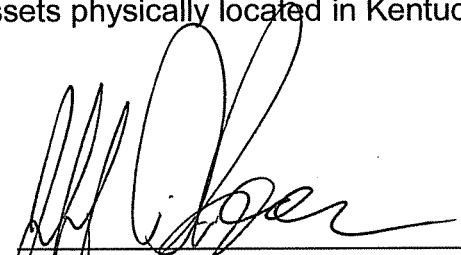
2. Explain in detail any impediments, other than those of a legal nature identified in response to Item 1. above, to jointly dispatching the generating units owned by the following entities:

- a. Duke Kentucky and Duke Ohio;
- b. Duke Kentucky and Duke Indiana;
- c. Duke Kentucky, Duke Ohio and Duke Indiana.

3. Explain in detail whether Duke Kentucky's and Duke Indiana's membership in different Regional Transmission Organizations creates an impediment to jointly dispatching their respective generating units.

4. Explain in detail whether Duke Ohio's ownership of the transmission assets physically located in Kentucky and needed by Duke Kentucky to serve its retail customers is an impediment to jointly dispatching the generating units owned by Duke Kentucky and Duke Indiana.

5. Explain in detail any discussions that have taken place over the past five years related to Duke Ohio selling its transmission assets physically located in Kentucky to Duke Kentucky.



Jeff Derouen
Executive Director
Public Service Commission
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DATED JUN 28 2011

cc: Parties of Record

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