## COMMONWEALTH OF KENTUCKY

## BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC TARIFF FILING OF DUKE ENERGY KENTUCKY, INC. OF A NATURAL GAS SERVICE MINIMUM USAGE AGREEMENT AND A PETITION FOR CONFIDENTIAL TREATMENT

CASE NO. 2020-00041

## COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION TO DUKE ENERGY KENTUCKY, INC.

Duke Energy Kentucky, Inc. (Duke Kentucky), pursuant to 807 KAR 5:001, is to file with the Commission an electronic version of the following information. The information requested herein is due within 14 days of the date of this request. The Commission directs Duke Kentucky to the Commission's March 16, 2020 and March 24, 2020 Orders in Case No. 2020-00085<sup>1</sup> regarding filings with the Commission. The Commission expects the original documents to be filed with the Commission within 30 days of the lifting of the current state of emergency. Responses to requests for information in paper medium shall be appropriately bound, tabbed, and indexed. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

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

<sup>&</sup>lt;sup>1</sup> Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-*19 (Ky. PSC Mar. 16, 2020), Order at 5–6. Case No. 2020-00085, *Electronic Emergency Docket Related* to the Novel Coronavirus COVID-19 (Ky. PSC Mar. 24, 2020), Order at 1–3.

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.

Duke Kentucky shall make timely amendment to any prior response if it obtains 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 Duke Kentucky fails or refuses to furnish all or part of the requested information, Duke Kentucky shall provide a written explanation of the specific grounds for its 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. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, Duke Kentucky shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to Duke Kentucky's response to Commission Staff's Second Request for Information (Staff's Second Request), Item 2, Confidential Attachment; Case No.

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2019-00388,<sup>2</sup> Duke Kentucky's response to Commission Staff's First Request for Information, Item 5; and Case No. 2018-00261,<sup>3</sup> Duke Kentucky's application, Schedule B-1, page 1 of 1. Explain why Duke Kentucky excluded Allowance for Funds Used During Construction (AFUDC) in the minimum usage calculation given that AFUDC is included in the total project estimate and Duke Kentucky's base rates.

2. Refer to Duke Kentucky's response to Staff's Second Request, Item 6. Explain in full detail why the customer is allocated costs from only phase 1 of the UL60 pipeline, and not also allocated costs from phase 2.

<sup>&</sup>lt;sup>2</sup> Case No. 2019-00388, Electronic Application of Duke Energy Kentucky, Inc. for a Certificate of Public Convenience and Necessity Authorizing the Construction of a Gas Pipeline from Erlanger, Kentucky to Hebron, Kentucky (Ky. PSC Oct. 21, 2019).

<sup>&</sup>lt;sup>3</sup> Case No. 2019-00388, Electronic Application of Duke Energy Kentucky, Inc. for Authority to 1) Adjust Natural Gas Rates 2) Approval of a Decoupling Mechanism 3) Approval of New Tariffs 4) and for All Other Required Approvals, Waivers, and Relief (Ky. PSC Mar. 27, 2019).

Kent A. Chandler Executive Director Public Service Commission P.O. Box 615 Frankfort, KY 40602

DATED \_\_\_\_\_ APR 21 2020

cc: Parties of Record

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