

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

AN ELECTRONIC EXAMINATION OF THE	)	
APPLICATION OF THE FUEL ADJUSTMENT	)	
CLAUSE OF DUKE ENERGY KENTUCKY,	)	CASE NO.
INC. FROM NOVEMBER 1, 2018 THROUGH	)	2021-00057
OCTOBER 31, 2020	)	

COMMISSION STAFF'S SECOND 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 on April 17, 2021. 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. All responses 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 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

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<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.

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 Duke Kentucky obtains information that indicates 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 the Direct Testimony of Brad Daniel, pages 10–11. Compare and contrast how Duke Kentucky would operate and participate in PJM's energy, capacity and ancillary service markets if it were to change its designation to a Reliability Pricing Model versus its current participation as a Fixed Resource Requirement company.

2. Refer to the Direct Testimony of Brett Phipps (Phipps Testimony), page 5. Provide a detailed step-by-step explanation of how the Fleet Analytics Stochastic Tool functions.

3. Refer to the Phipps Testimony, page 6. Explain whether Duke Kentucky has terminated the contract with the Company in bankruptcy.

4. Refer to the Phipps Testimony, page 6. Because Duke Kentucky does not maintain firm gas pipeline capacity and buys gas on the spot market, explain how Duke Kentucky would operate Woodsdale units during an extreme cold weather event such as recently experienced in Texas. In other words, explain whether pipeline capacity or gas will be available for purchase, and whether the units would be able to operate and to participate in PJM markets.

5. Refer to the Phipps Testimony, page 8, lines 1–17. Explain whether Duke Kentucky currently has rescheduled coal deliveries with any of its current contracted coal suppliers.

6. Refer to the Direct Testimony of John D. Swez, page 6, lines 4–6. Explain whether Duke Kentucky has any bilateral capacity purchase contracts or plans to enter into such contracts, and if so, provide the identity of the contracted party and the amount and timing of the capacity purchase.

7. Refer to the Direct Testimony of Libbie S. Miller, page 4, lines 1–22, and page 5, lines 1–6. It appears that Duke Kentucky is choosing a base fuel rate such that it will refund money rather than charge additional money for fuel to its customers. Explain how volatility is reduced by choosing a base fuel rate that is higher than projected fuel rates.

8. Refer to the Commission Staff's First Request for Information (Staff's First Request), Item 7. Explain how some but not all Woodsdale units could experience low gas pressure such that they would be removed from service.

9. Refer to the Staff's First Request, Item 11, pages 1–2, Coal b. Explain what "Native purchases may be allowed for forced outages" means, particularly the word "Native."

10. Refer to the Staff's First Request, Item 15, Attachment Staff-DR-01–15\_Attachment.xlsx. Explain whether taking the Woodsdale units off-line due to low gas pressure is considered an outage, and if so, where on the spreadsheet the Woodsdale units are taken off-line due to low gas pressure.



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DATED APR 05 2021

cc: Parties of Record

Case No. 2021-00057

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