

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF DUKE ENERGY)	
KENTUCKY, INC. FOR A CERTIFICATE OF)	
PUBLIC CONVENIENCE AND NECESSITY TO)	
CLOSE ITS EAST LANDFILL AT THE EAST)	CASE NO.
BEND GENERATING STATION AND FOR)	2021-00290
APPROVAL TO AMEND ITS ENVIRONMENTAL)	
COMPLIANCE PLAN FOR RECOVERY BY)	
ENVIRONMENTAL SURCHARGE MECHANISM)	

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 is due on February 2, 2022. The Commission directs Duke Kentucky to the Commission's July 22, 2021 Order in Case No. 2020-00085¹ regarding filings with the Commission. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the question to which the response is made, and 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

¹ Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC July 22, 2021), Order (in which the Commission ordered that for case filings made on and after March 16, 2020, filers are NOT required to file the original physical copies of the filings required by 807 KAR 5:001, Section 8).

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 Adam S. Deller (Deller Testimony), page
5. Provide a description of how bids will be solicited under the East Landfill closure plan.
2. Refer to the Deller Testimony, page 7, lines 6–12.
 - a. Describe all alternatives to the East Landfill closure methods proposed by Duke Kentucky.

b. Explain why Duke Kentucky did not evaluate closure of the East Landfill by removal of coal combustion residuals (CCR) and decontamination, as allowed by 40 CFR § 257.102(a).

3. Discuss the risks to Duke Kentucky's ratepayers of closing the East Landfill by leaving the CCR in place and installing a final cover system.

4. Discuss the risks to Duke Kentucky's ratepayers of closing the East Landfill by removal of the CCR and decontamination.

5. Provide estimates of the following:

a. Tons of CCR and contaminated soil in the East Landfill;

b. Distance to nearest facility permitted to accept CCR;

c. Per ton transportation rate; and

d. Per ton disposal rate at a third-party landfill.

6. Provide the closure and post closure activities and estimated costs, unrelated to the disposal of CCR and contaminated soil, if the East Landfill were to be closed by removal and decontamination.

7. Explain the permit updates that would be required to close the East Landfill by removal and decontamination.

8. Explain any barriers to or benefits from the closure of the East Landfill by removal of CCR and decontamination.

9. Provide the deadline for the closure of the East Landfill, including all available extensions.

10. Explain whether Duke Kentucky would be able to close the East Landfill by removal of CCR and decontamination before the deadline for closure.



Linda C. Bridwell, PE
Executive Director
Public Service Commission
P.O. Box 615
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DATED JAN 12 2022

cc: Parties of Record

Case No. 2021-00290

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