



139 East Fourth Street P.O. Box 960 Cincinnati, OH 45201-0960 Telephone: (513) 419-1805 Facsimile: (513) 419-1846

Kristen Cocanougher Sr. Paralegal E-mail: Kristen cocanougher@duke-energy.com

# **VIA OVERNIGHT DELIVERY**

September 14, 2010

Mr. Jeff Derouen Executive Director Kentucky Public Service Commission 211 Sower Blvd Frankfort, KY 40601 RECEIVED

SEP 1 5 2010

PUBLIC SERVICE

COMMISSION

Re: <u>Case No. 2010-00203</u>

Dear Mr. Derouen:

Enclosed please find an original and twelve copies of the *Revised Response of Duke Energy Kentucky, Inc. to Midwest ISO's Data Request Number 02-005* in the above captioned case.

Please date-stamp the extra two copies of the filing and return to me in the enclosed envelope.

Sincerely,

Bristin Cournghue Kristen Cocanougher

cc: Parties of record

## **VERIFICATION**

State of Ohio	)
	`
	,
County of Hamilton	
County of Haimmon	

The undersigned, Ron Snead, being duly sworn, deposes and says that I am employed by the Duke Energy Corporation affiliated companies as General Manager, System Planning and Operations; that on behalf of Duke Energy Kentucky, Inc., I have supervised the preparation of the revised response to the foregoing information requests; and that the matters set forth in the foregoing response to information requests are true and accurate to the best of my knowledge, information and belief after reasonable inquiry.

Ron Snead, Affiant

Subscribed and sworn to before me by Ron Snead on this  $14^{\text{TH}}$  day of September, 2010.

ADELE M. DOCKERY Notary Public, State of Ohio My Commission Expires 01-05-2014

NOTARY PUBLIC

My Commission Expires: 1/5/2014

Duke Energy Kentucky Case No. 2010-00203 MISO Second Set Data Request Date Received: August 13, 2010

### REVISED MISO-DR-02-005

### **REQUEST:**

A. Appendix A to the STAFF-DR-01-006 Attachment — an Interconnection Agreement between Duke Energy Business Services, LLC acting as agent for Duke Energy Ohio, Inc. and Duke Energy Kentucky, Inc. and East Kentucky Power Cooperative, Inc. (Midwest ISO FERC Electric Tariff, 4th Rev'd Vol. No.1, Orig. Service Agmt No.2168) — contains facility schedules listing "Duke Energy-Owned Interconnection Facilities" for points of interconnection.

As to each such interconnection facility listed:

- 1. Which Duke Energy entity owns (or in the case of to-be-installed/constructed facilities, will own) the facility?
- 2. Identify where (if at all) that facility is listed on Attachment 1 to the DEK Application in this case.
- B. Are any of the to-be-installed/constructed facilities included in the Midwest ISO's MTEP or PJM's RTEPP? If not, why? If so, identify each such facility and provide details regarding its inclusion in MTEP or RTEPP (or both).
- C. As to each listed interconnection point with EKP:
  - 1. Which Duke Energy entity's transmission or generation facilities are being (or will be) interconnected with EKP?
  - 2. Identify where (if at all) that interconnected facility is listed on Attachment 1 to the DEK Application in this case. Is a Duke Energy entity served (or to be served) through that interconnection point and, if so, which Duke Energy entity? To the extent not already done in response to subparts (a) or (c), identify which of the transmission facilities listed on Attachment 1 to the DEK application are DEK transmission assets.

#### **RESPONSE:**

A

1

• Mt. Zion – Boone – Duke Energy Ohio owns the Duke facilities associated with this interconnection point.

- Hebron Interconnection Point Duke Energy Ohio owns the transmission facilities to which the new EKPC owned transmission substation will be connected.
- Webster Road Interconnection Point Duke Energy Ohio owns the transmission facilities to which this new EKPC transmission substation will be connected.

2

Mount Zion - Boone is listed on page 64 of Attachment 1 (Buffington – Boone). Webster Road and Hebron (EKPC) are not listed. They are not yet constructed.

В

 Objection. This Document Request seeks to elicit information regarding MTEP that is already within the possession of the Midwest ISO and thus must be construed as harassing in nature. Without waiving said objection, none of the facilities are in the PJM RTEPP. The Hebron and Webster Road facilities are listed in the MISO MTEP, as projects 2871, and 2867, respectively. These facilities are being paid for by EKPC.

 $\mathbf{C}$ 

1

- The Mount Zion Boone Interconnection is between Duke's Mt. Zion Station, and EKPC's Boone Station.
- EKPC's Hebron Transmission Station will be connected to Duke Energy Ohio's Miami Fort to Crescent circuit.
- EKPC's Webster Road Station will be connected to Duke Energy Ohio's Silver Grove Kenton Hands- Buffington circuit.

2

- Mt Zion Boone is listed on page 64 of Attachment 1. This interconnection is not for the purpose of serving Duke Energy Kentucky load.
- Miami Fort to Crescent is listed on page 64 of Attachment 1. Hebron is not for the purpose of serving Duke Energy Kentucky load.
- Silver Grove Buffington is listed on page 64 of Attachment 1, and is not for the purpose of serving Duke Energy Kentucky load.

Transmission Interconnections with East Kentucky Power Cooperative are associated with Duke Energy Ohio Transmission, and are for the purpose of strengthening the interconnected transmission systems of EKP, and Duke Energy. Duke Energy Kentucky does have a delivery point at Longbranch, which is a radial feed on the EKP side of the "Mount Zion – Boone" interconnection point.

The transmission interconnection, originally known as Buffington – Boone, and now known as Mt. Zion – Boone, predates the delivery point, at Longbranch, by a number of years, and was not created for the purpose of delivering power to a specific load delivery point.

The following assets listed on Attachment 1 are Duke Energy Kentucky owned facilities:

From page 20 – Augustine, Belleview, Cold Spring, Constance, Crescent, Dayton

From Page 21 – Donaldson, Florence, Hands, Hebron, Kenton, Kentucky University, LaFarge, Longbranch, and Silver Grove

From page 22 - Wilder, York

From Page 34 (nontransferred facilities)— Alexandria South, Atlas, Beaver, Blackwell, Buffington, Claryville, Cold Spring, Constance

From page 35 (nontransferred facilities)— Covington, Crittendon, DeCoursey, Dixie, Dry Ridge, Empire, Grant, Johnson Controls, Kenton, Levi Strauss, Limaburg, Marshall, Newport Steel, Oakbrook, Richwood, Thomas Moore, Verona, Villa, White Tower, Wilder

PERSON RESPONSIBLE: Ron Snead

Objection as to (B) – Legal