

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF DUKE ENERGY KENTUCKY,)	
INC., FOR A DECLARATORY ORDER THAT)	
THE CONSTRUCTION OF A NEW LANDFILL)	
CONSTITUTES AN ORDINARY EXTENSION IN)	CASE NO.
THE USUAL COURSE OF BUSINESS OR, IN)	2015-00089
THE ALTERNATIVE, FOR A CERTIFICATE OF)	
PUBLIC CONVENIENCE AND NECESSITY)	

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 the original and ten copies of the following information, with a copy to all parties of record. The information requested herein is due no later May 8, 2015. 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 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 should 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 document containing personal information, Duke Kentucky shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the document so that personal information cannot be read.

1. Refer to Duke Kentucky's response to Commission Staff's Initial Request for Information ("Staff's First Request"), Item 6.

a. With respect to the response to Item 6.a., explain how Duke Kentucky arrived at the estimated costs for each phase of the proposed West Landfill project.

b. With respect to the response to Item 6.c., explain why the land cost is not included in the budgeted cost of \$159 million for the landfill project, and provide the impact of including the land cost in the analysis of relative benefits and costs of the project.

2. Refer to Duke Kentucky's response to Staff's First Request, Item 12. Provide a detailed description of the competitive bid process and the analysis that Duke Kentucky will employ to screen the proposals received in response to those competitive bids.

3. Refer to the Direct Testimony of Tammy Jett ("Jett Testimony"), page 14, regarding anticipated modifications to the proposed West Landfill to be in compliance with the Coal Combustion Residual ("CCR") rule. Provide an explanation as to the scope of the detailed engineering evaluations that need to be done to fully assess the impact of the CCR rule on the West Landfill and the timeline for those evaluations.

4. Refer to the Jett Testimony, page 15, regarding the potential closure of the East Bend ash pond. Has Duke Kentucky begun formal evaluations of the impact of the CCR rule?

a. If not, provide a detailed timeline for Duke Kentucky's evaluations of the impact of the CCR rule.

b. If so, provide a detailed description of those evaluations, including a determination of the likelihood of closure for the ash pond and when the closure will potentially occur.

5. Refer to the Direct Testimony of William Don Wathen Jr., page 5, regarding the impact on customer rates due to constructing the landfill.

a. Provide an estimate of the impact on an average residential customer's bill assuming the full cost of the project is being recovered.

b. Provide all supporting documentation and schedules supporting the calculation.



Jeff Derouen
Executive Director
Public Service Commission
P.O. Box 615
Frankfort, KY 40602

DATED **MAY 01 2015**

cc: Parties of Record

*M. Evan Buckley
Goss Samford, PLLC
2365 Harrodsburg Road, Suite B325
Lexington, KENTUCKY 40504

*Rocco O D'Ascenzo
Duke Energy Kentucky, Inc.
139 East Fourth Street
P. O. Box 960
Cincinnati, OH 45201

*Duke Energy Kentucky, Inc.
139 East Fourth Street
Cincinnati, OH 45202

*Gregory T Dutton
Assistant Attorney General
Office of the Attorney General Utility & Rate
1024 Capital Center Drive
Suite 200
Frankfort, KENTUCKY 40601-8204

*Mark David Goss
Goss Samford, PLLC
2365 Harrodsburg Road, Suite B325
Lexington, KENTUCKY 40504

*David S Samford
Goss Samford, PLLC
2365 Harrodsburg Road, Suite B325
Lexington, KENTUCKY 40504