

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	)	CASE NO.
CONSTRUCT PHASE TWO OF ITS WEST	)	2018-00156
LANDFILL AND APPROVAL TO AMEND ITS	)	
ENVIRONMENTAL COMPLIANCE PLAN FOR	)	
RECOVERY BY ENVIRONMENTAL SURCHARGE	)	
MECHANISM	)	

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 an electronic version of its responses to the following information, with a copy to all parties of record. The information requested herein is due on or before September 17, 2018. 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 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, it 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 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 the Attorney General's Initial Data Requests, Item 1.

a. Regarding a state CCR rule program for Kentucky, provide the status and the anticipated time frame in which the "participating state" status will be achieved by Kentucky, if known to Duke Kentucky.

b. Provide the support for the statement that "there is no reason to believe the State would relax any requirements which would reduce construction or O&M costs related to the West Landfill Cell 2."

c. Provide in detail Duke Kentucky's belief that a "no migration" cannot be successfully demonstrated at East Bend and explain what the requirements of a successful "no migration" demonstration would entail.

d. Provide in detail which parts of the CCR Rule are still subject to the April 2019 “cease receipt and begin closure” date requirement.

2. Refer to Duke Kentucky’s response to Commission Staff’s First Request for Information (Staff’s First Request), Item 1. Explain how Duke Kentucky will manage the West Landfill Cell 1 and Cell 2 footprint to limit the open footprint to 55 open acres, as required to properly form Poz-o-tec and comply with the operational permit.

3. Refer to Duke Kentucky’s response to Staff’s First Request, Item 5.

a. Refer to subpart b of Item 5. Explain why the fly ash transportation costs from other generating source decreased from \$742,481 in 2013 to \$453,075 in 2014 and from \$630,413 in 2016 to \$495,847 in 2017.

b. Refer to subpart c of Item 5. Provide an explanation as to why Duke Kentucky no longer receives fly ash from the generating source that did not charge any transportation cost.



Gwen R. Pinson  
Executive Director  
Public Service Commission  
P.O. Box 615  
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DATED     **AUG 3 1 2018**    

cc: Parties of Record

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