

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF DUKE ENERGY)	
KENTUCKY, INC. FOR AN ORDER APPROVING)	
THE ESTABLISHMENT OF A REGULATORY)	CASE NO.
ASSET FOR THE LIABILITIES ASSOCIATED)	2020-00031
WITH THE PJM EXPENSES RELATED TO THE)	
GREENHAT ENERGY, LLC DEFAULT)	

COMMISSION STAFF'S INITIAL 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 the following information. The information requested herein is due on April 3, 2020. The Commission directs Duke Kentucky to the Commission's March 16, 2020 Order in Case No. 2020-00085,¹ regarding the filing of physical documents with the Commission. The Commission expects that original documents will be filed with the Commission within 30 days of the lifting of the current state of emergency.² 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

¹ Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC Mar. 16, 2020) Order at 5–6. The Commission has suspended the filing of original paper documents with the Commission, except for the filing of confidential information, with the expectation that a physical copy be filed when the state of emergency has ceased.

² Any electronic email filed in this matter should be sent to PSCED@ky.gov, and each message should include the case number in the subject line of the message and a read receipt to ensure the Commission received the message and documents.

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, 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 application, page 3, paragraph 6.
 - a. Explain when Duke Kentucky expects the GreenHat Energy, LLC (GreenHat) default amount to be finalized.

b. State the time frame for which Duke Kentucky anticipates being allocated GreenHat default charges.

2. Refer to the application, page 5, paragraph 10.

a. Provide the Federal Energy Regulatory Commission (FERC) Account Nos. to which Duke Kentucky originally recorded the GreenHat default allocations.

b. Annually and by account number, provide the annual costs recorded by Duke Kentucky in FERC Account Nos. 560–576.5 for each of the past five calendar years.

3. Refer to the application, page 7, paragraph 14. For the base and forecasted test periods from Case No. 2019-00271,³ provide the amounts included in FERC Account Nos. 560–576.5, by account.

4. Refer to the application, page 8, paragraph 15.

a. Provide a monthly breakdown of the \$462,204.54 GreenHat default expense estimate.

b. Confirm that the total GreenHat default expense estimate is from PJM Billing Line Item 1999A. If not, list all the PJM Billing Line Items associated with the GreenHat default expense estimate and the associated costs for each line item.

5. Refer to the application, page 8, paragraph 16.

a. Explain why a credit to Account No. 242890 Deferred Rev Pay – Fuel is appropriate.

³ Case No. 2019-00271, *Electronic Application of Duke Energy Kentucky, Inc. for 1) An Adjustment of the Electric Rates; 2) Approval of New Tariffs; 3) Approval of Accounting Practices to Establish Regulatory Assets and Liabilities; and 4) All Other Required Approvals and Relief* (Application filed Sept. 3, 2019).

b. Explain why a credit to Account No. 456111 Other Transmission Revenues is appropriate.

6. Refer to the application, page 8, paragraph 17. Explain why Duke Kentucky is requesting to include carrying charges at its long-term debt rate in the proposed regulatory asset.

7. Explain whether any portion of the GreenHat default charges were reflected in Duke Kentucky's Profit Sharing Mechanism.



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DATED MAR 19 2020

cc: Parties of Record

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