

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF DUKE ENERGY )	
KENTUCKY, INC. FOR AN ADJUSTMENT TO )	CASE NO.
RIDER NM RATES AND FOR TARIFF )	2023-00413
APPROVAL )	

COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION  
TO DUKE ENERGY KENTUCKY, INC.

Duke Energy Kentucky, Inc. (Duke Kentucky), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due on March 22, 2024. The Commission directs Duke Kentucky to the Commission's July 22, 2021 Order in Case No. 2020-00085<sup>1</sup> 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 person supervising the preparation of the response on behalf of the entity that the

---

<sup>1</sup> 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).

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 or incomplete when made or, though correct or complete when made, is now incorrect or incomplete 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 and scanned 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 Bruce Sailors (Sailors Direct Testimony) at 16-17.

- a. Recognizing the Commission's approved method in Case No. 2020-00174<sup>2</sup>, provide justification for using forecasted LMPs over the next 25 years to develop

---

<sup>2</sup> Case No. 2020-00174 *Electronic Application of Kentucky Power Company for (1) A General Adjustment of its Rates for Electric Service; (2) Approval of Tariffs and Riders; (3) Approval of Accounting Practices to Establish Regulatory Assets and Liabilities (4) Approval of a Certificate of Public Convenience and Necessity; and (5) All Other Required Approvals and Relief* (Ky. PSC May 14, 2021), Order at 26-27.

average annual prices instead of two historic years of LMP data and then levelized the average LMPs over a 25-year period. Include in the explanation specific reasons for the variance.

b. Explain step-by-step how “a weighted average price is calculated based on the actual residential excess generation profile from the 2022 customer-generator sample” and identify the cells and tabs in BLS-3 CONFIDENTIAL that represent each step of the calculation.

c. Confirm if the 2022 customer-generator sample refers to the 225 Residential Customer-generators in Table 2 of Sailers Direct Testimony. If not confirmed, explain what comprises the 2022 customer generator sample.

2. Refer to Sailers Direct Testimony, Attachment BLS-3 CONFIDENTIAL.

a. Describe the data in Column E of tab Energy Inputs. Provide the data source and any underlying workpapers to used derive the data.

b. Describe the data in Column H and L of tab Energy Inputs. Provide the data source and any underlying workpapers to used derive the data.

3. Refer to the Direct Testimony of Matthew Kalemba (Kalemba Direct Testimony) at 4, line 15 through page 5, line 8. Confirm that in using the production cost model in Encompass, all resources were dispatched economically. In other words, confirm that there were no constraints in the model that required certain units to run. If this is not the case, please explain.

4. Provide a copy of Duke Kentucky’s distribution system planning manual or equivalent document.

5. Refer to Duke Kentucky's tariff on file with the Commission, pdf pages 138-148 (<https://psc.ky.gov/tariffs/Electric/Duke%20Energy%20Kentucky/Tariff.pdf>).

a. Explain whether Duke Kentucky has made or plans to make any changes to the Interconnection Approval form and the Level 1 and Level 2 Applications for Interconnection and Net Metering – Kentucky.

b. If changes have been made to the forms, provide a clean and redlined copy of the revised forms and explain why the revised forms were not included in this application.

c. Explain whether Duke Kentucky plans to keep these forms in its tariff.



Linda C. Bridwell, PE  
Executive Director  
Public Service Commission  
P.O. Box 615  
Frankfort, KY 40602

DATED     MAR 12 2024    

cc: Parties of Record

\*Angela M Goad  
Assistant Attorney General  
Office of the Attorney General Office of Rate  
700 Capitol Avenue  
Suite 20  
Frankfort, KENTUCKY 40601-8204

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

\*Randal A. Strobo  
Strobo Barkley PLLC  
239 South 5th Street  
Ste 917  
Louisville, KENTUCKY 40202

\*Ashley Wilmes  
Kentucky Resources Council, Inc.  
Post Office Box 1070  
Frankfort, KENTUCKY 40602

\*Larisa Vaysman  
Duke Energy Kentucky, Inc.  
139 East Fourth Street  
Cincinnati, OH 45201

\*Byron Gary  
Kentucky Resources Council, Inc.  
Post Office Box 1070  
Frankfort, KENTUCKY 40602

\*Lawrence W Cook  
Assistant Attorney General  
Office of the Attorney General Office of Rate  
700 Capitol Avenue  
Suite 20  
Frankfort, KENTUCKY 40601-8204

\*Debbie Gates  
Duke Energy Kentucky, Inc.  
139 East Fourth Street  
Cincinnati, OH 45201

\*Matt Partymiller  
President  
Kentucky Solar Industries Association  
1038 Brentwood Court  
Suite B  
Lexington, KENTUCKY 40511

\*Honorable David Edward Spenard  
Strobo Barkley PLLC  
239 South 5th Street  
Ste 917  
Louisville, KENTUCKY 40202

\*J. Michael West  
Office of the Attorney General Office of Rate  
700 Capitol Avenue  
Suite 20  
Frankfort, KENTUCKY 40601-8204

\*Thomas J FitzGerald  
Counsel & Director  
Kentucky Resources Council, Inc.  
Post Office Box 1070  
Frankfort, KENTUCKY 40602

\*Minna Sunderman  
Duke Energy Kentucky, Inc.  
139 East Fourth Street  
Cincinnati, OH 45201

\*John G Horne, II  
Office of the Attorney General Office of Rate  
700 Capitol Avenue  
Suite 20  
Frankfort, KENTUCKY 40601-8204

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