

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF DUKE ENERGY)	
KENTUCKY, INC. FOR (1) AN ADJUSTMENT OF)	
ELECTRIC RATES; (2) APPROVAL OF NEW)	CASE NO.
TARIFFS; (3) APPROVAL OF ACCOUNTING)	2022-00372
PRACTICES TO ESTABLISH REGULATORY)	
ASSETS AND LIABILITIES; AND (4) ALL OTHER)	
REQUIRED APPROVALS AND RELIEF)	

COMMISSION STAFF'S POST-HEARING REQUEST FOR INFORMATION
TO DUKE ENERGY KENTUCKY, INC.

Duke Energy Kentucky, Inc. (Duke Kentucky), pursuant to 807 KAR 5:001E, shall file with the Commission an electronic version of the following information. The information requested is due no later than May 26, 2023. The Commission directs Duke Kentucky to the Commission's July 22, 2021 Order in Case No. 2020-00085¹ 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

¹ 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).

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 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 5:001E, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to Case No. 2022-00364, *Electronic Application of Duke Energy Kentucky, Inc. for a Certificate of Public Convenience and Necessity to Construct a 138-kV Transmission Line and Associated Facilities in Boone County, Kentucky* (filed Apr. 6, 2023).

a. Explain whether the test-year rate base in this proceeding included any amount for the 138 kV transmission line and associated facilities proposed in Case No. 2022-00364.

b. Provide a breakdown of the specific expenses for the project that are included in the test-year and the in-service date for this project.

c. In Excel spreadsheet format, with all formulas, columns, and rows unprotected and fully accessible, provide the revenue requirement adjustment necessary to fully remove this project from the forecasted test-year.

2. Refer to Duke Kentucky's response to the Attorney General's Second Request for Information, Item 40, Attachment 1, Form 2.5.

a. Provide the length of time Duke Kentucky added magnesium hydroxide to the scrubber chemical mix.

b. Provide the monthly, and total cost, for the magnesium hydroxide that was purchased.

3. Refer to the Application, Volume 10, Schedule D-2.23 and Schedules F-1 through F-7. In Excel spreadsheet format, with all formulas, columns, and rows unprotected and fully accessible, provide a reconciliation between the expenses shown on Schedules F-1 through F-7 and the adjustment shown on Schedule D-2.23.

4. Provide a copy of the PJM Interconnection LLC (PJM) Business Practice Manual 14D, Generator Operational Requirements.

5. Provide a copy of the purchase and sale agreement between Duke Kentucky and Cinergy Receivables Company (CRC).

6. Refer to Duke Kentucky's 2022 Annual Report of Late Payment Fee Waivers in Case No. 2021-00190.² Provide the reason 1,143 Duke Kentucky electric customers received a late payment fee waiver in August 2022.

7. Refer to the Application, Volume 13, Direct Testimony of Jacob S. Colley page 194, lines 2-9 (Colley Direct Testimony). From March 2021 through March 2021, provide the number of customers that triggered incremental credit and collection costs who are customers on payment plans resulting from the COVID-19 Pandemic.

8. Refer to the Application, Volume 1, page 70, line 1, DCAPINC - Taylor Mill Sub - DKY2135 -Tier 1.

a. Provide all expenditures for DCAPINC - Taylor Mill Sub - DKY2135 - Tier 1 in the test year rate base.

b. If expenditures for DCAPINC - Taylor Mill Sub - DKY2135 -Tier 1 were included in the test year, provide the estimated in-service date for this project.

c. If expenditures for DCAPINC - Taylor Mill Sub - DKY2135 -Tier 1 were included in the test year, provide the adjustment necessary to fully remove this project from the test year in Excel spreadsheet format with all formulas, columns, and rows unprotected and fully accessible.

9. Refer to the Application, Volume 1, page 70, line 3, for WD301205 WGS CT3 Overhaul No 3.

a. Provide all expenditures for WD301205 WGS CT3 Overhaul No 3 in the test year.

² Case No. 2021-00190, *Electronic Application of Duke Energy Kentucky, Inc. for: 1) an Adjustment of the Natural Gas Rates; 2) Approval of New Tariffs, and 3) All Other Required Approvals, Waivers, and Relief* (filed Apr. 21, 2023).

b. If expenditures for WD301205 WGS CT3 Overhaul No 3 were included in the test year, provide the in-service date for this project.

c. If expenditures for WD301205 WGS CT3 Overhaul No 3 were included in the test year, provide the adjustment necessary to fully remove this project from the test year in Excel spreadsheet format with all formulas, columns, and rows unprotected and fully accessible.

10. Refer to the Application, Volume 14, Direct Testimony of Bruce L. Sailers, page 26 (Sailers Direct Testimony). Provide the approved tariffs for Duke Energy Indiana (Duke Indiana) and Duke Energy Ohio (Duke Ohio) that the updated Rider DIR, Development Incentive Rider was modeled after.

11. Refer to Duke Kentucky's Fourth Supplemental response to Commission Staff's First Request for Information, Item 14. For the columns "Hours Worked" and "Rate Per Hour" explain why N/A appears, but there is an associated dollar amount in the Consultant column. Provide any invoice, contract, or supporting document for the charge.

12. Explain how property plant accounts are created for installed utility poles, from installation to unitization of the utility pole. Include in the explanation which data points are recorded at each step and how those data points are created.

13. Regarding Duke Kentucky's advanced metering infrastructure meters for which the communicating component is turned off, explain whether interval data is available and whether interval data is collected by meter readers.

14. Provide the estimated implementation date for Duke Kentucky's rate calculator for the proposed time-of-use with critical peak pricing tariff and explain how customers will access the rate calculator.

15. Provide access to Duke Kentucky's rate calculator for the proposed time-of-use with critical peak pricing tariff. If customer data is required to utilize the rate calculator, provide simulated customer data that will allow use of the rate calculator.



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Public Service Commission
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DATED MAY 16 2023

cc: Parties of Record

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