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Rocco.D'Ascenzo@duke-energy.com  
Rocco O. D'Ascenzo  
Deputy General Counsel

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MAR 30 2020

AH  
PUBLIC SERVICE  
COMMISSION

**VIA OVERNIGHT DELIVERY**

March 30, 2020

Kent Chandler  
Executive Director  
Kentucky Public Service Commission  
211 Sower Blvd  
Frankfort, KY 40601

**RE: Administrative Case No. 387 – Annual Load/Demand Forecast Report**

Dear Mr. Chandler:

Enclosed please find the 2019 redacted responses to the Commission data requests filed annually, as ordered in Administrative Case No. 387, paragraph 2, dated October 7, 2005. These updated responses are being filed separately from the Annual Reporting of Duke Energy Kentucky upon request.

We have included the unredacted and highlighted responses in a separate envelope to be filed under seal. Also enclosed is a Petition for Confidential Treatment for your consideration in the above referenced matter.

Please date-stamp the two copies of this letter and return to me in the enclosed return-addressed envelope. Should you have any questions or concerns, please do not hesitate to contact me.

Sincerely,

*Rocco D'Ascenzo*

Rocco D'Ascenzo  
Deputy General Counsel

Enclosures

**COMMONWEALTH OF KENTUCKY**  
**BEFORE THE PUBLIC SERVICE COMMISSION**

A Review of The Adequacy of	)	
Kentucky's Generation Capacity and	)	Administrative
Transmission System	)	Case No. 387

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**DUKE ENERGY KENTUCKY, INC.'S**  
**PETITION FOR THE CONFIDENTIAL TREATMENT OF INFORMATION FILED**  
**FOR CALENDAR YEAR 2019**

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Duke Energy Kentucky, Inc. (Duke Energy Kentucky or Company), pursuant to 807 KAR 5:001, Section 13, respectfully requests the Commission to classify and protect certain information provided by Duke Energy Kentucky in its response to Data Request No. 11, as requested by Commission Staff (Staff). The information that Staff seeks, and for which Duke Energy Kentucky now seeks confidential treatment (Confidential Information), includes planned outage and retirement schedules by plant. In support of this Motion, Duke Energy Kentucky further states:

1. The Kentucky Open Records Act exempts from disclosure certain commercial information. KRS 61.878(1)(c). To qualify for this exemption and, therefore, maintain the confidentiality of the information, a party must establish that disclosure of the commercial information would permit an unfair advantage to competitors of that party. Public disclosure of the information identified herein would, in fact, prompt such a result for the reasons set forth below.

2. The list of projected outages, as contained in response to Data Request No. 11, will grant vendors a distinct advantage in that they would be able to anticipate Duke Energy

Kentucky's maintenance schedules. Duke Energy Kentucky submits that the following information, if openly disclosed, could give its competitors access to competitively sensitive, confidential information, which in turn could cause energy prices to consumers to be above competitive rates, and would permit competitors of Duke Energy Kentucky to gain an unfair competitive advantage in the marketplace:

a. Scheduled outages or retirements of generating capacity during the current year and the following four years.

3. The information for which Duke Energy Kentucky is seeking confidential treatment is not known outside of Duke Energy Corporation.

4. Duke Energy Kentucky does not object to limited disclosure of the confidential information described herein, pursuant to an acceptable protective agreement, to the Attorney General or other intervenors with a legitimate interest in reviewing the same for the purpose of participating in this case.

5. This information was, and remains, integral to Duke Energy Kentucky's effective execution of business decisions and such information is generally regarded as confidential or proprietary. Indeed, as the Kentucky Supreme Court has found, "information concerning the inner workings of a corporation is 'generally accepted as confidential or proprietary.'" *Hoy v. Kentucky Industrial Revitalization Authority*, 904 S.W.2d 766, 768 (Ky. 1995).

6. In accordance with the provisions of 807 KAR 5:001, Section 13(3), the Company is filing one copy of the Confidential Information separately under seal, and one copy without the confidential information included.

7. Duke Energy Kentucky respectfully requests that the Confidential Information be withheld from public disclosure for a period of ten years. This will assure that the Confidential

Information – if disclosed after that time – will no longer be commercially sensitive so as to likely impair the interests of the Company or its customers if publicly disclosed.

8. To the extent the Confidential information becomes generally available to the public, whether through filings required by other agencies or otherwise, Duke Energy Kentucky will notify the Commission and have its confidential status removed, pursuant to 807 KAR 5:001 Section 13(10)(a).

WHEREFORE, Duke Energy Kentucky, Inc., respectfully requests that the Commission classify and protect as confidential the specific information described herein.

Respectfully submitted,

DUKE ENERGY KENTUCKY, INC.

Rocco D'Ascenzo/lcms

Rocco D'Ascenzo (92796)

Deputy General Counsel

139 East Fourth Street, 1303-Main

Cincinnati, Ohio 45202

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E-mail: [rocco.d'ascenzo@duke-energy.com](mailto:rocco.d'ascenzo@duke-energy.com)

*Counsel for Duke Energy Kentucky, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing filing was served on the following via overnight mail, this 30<sup>th</sup> day of March 2020.

Rocco D'Ascenzo lems  
Rocco D'Ascenzo

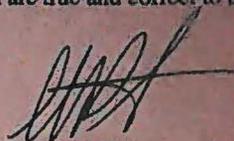
John G. Horne, II  
The Office of the Attorney General  
Utility Intervention and Rate Division  
700 Capital Avenue, Suite 118  
Frankfort, Kentucky 40601



VERIFICATION

STATE OF NORTH CAROLINA )  
 ) SS:  
COUNTY OF MECKLENBURG )

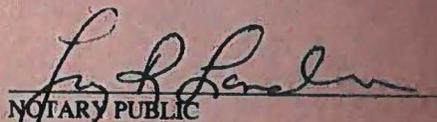
The undersigned, Scott Park, Director IRP & Analytics-Midwest, being duly sworn, deposes and says that he has personal knowledge of the matters set forth in the foregoing data requests, and that the answers contained therein are true and correct to the best of his knowledge, information and belief.



\_\_\_\_\_  
Scott Park, Affiant

Subscribed and sworn to before me by Scott Park on this \_\_\_\_ day of March 2020.

Tracy R Landrum  
NOTARY PUBLIC  
MECKLENBURG COUNTY, N.C.  
My Commission Expires 05-07-2023

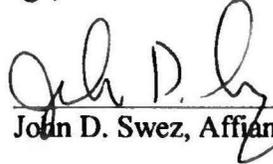
  
\_\_\_\_\_  
NOTARY PUBLIC

My Commission Expires: 05.07.2023

VERIFICATION

STATE OF NORTH CAROLINA )  
 ) SS:  
COUNTY OF MECKLENBURG )

The undersigned, John D. Swez, Director of General Dispatch & Operations, Power Trading and Dispatch, being duly sworn, deposes and says that he has personal knowledge of the matters set forth in the foregoing data requests, and that the answers contained therein are true and correct to the best of his knowledge, information and belief.

  
John D. Swez, Affiant

Subscribed and sworn to before me by John D. Swez on this 18 day of March, 2019.

Notary Public  
Matthew Jones  
Mecklenburg North Carolina  
Comm# 201707300105  
My Comm. Expires 04/09 12022

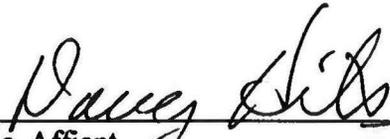
  
NOTARY PUBLIC

My Commission Expires: Apr. 19 2022

**VERIFICATION**

STATE OF OHIO                    )  
  )     SS:  
COUNTY OF HAMILTON         )

The undersigned, Doug Hils, Developmental Assignment Leader, being duly sworn, deposes and says that he has personal knowledge of the matters set forth in the foregoing data requests, and that the answers contained therein are true and correct to the best of his knowledge, information and belief.

  
\_\_\_\_\_  
Doug Hils, Affiant

Subscribed and sworn to before me by Doug Hils, on this 13<sup>TH</sup> day of March, 2020.



**ADELE M. FRISCH**  
Notary Public, State of Ohio  
My Commission Expires 01-05-2024

  
\_\_\_\_\_  
NOTARY PUBLIC

My Commission Expires: 1/5/2024

**VERIFICATION**

**STATE OF INDIANA** )  
 ) **SS:**  
**COUNTY OF HENDRICKS** )

The undersigned, Timothy J. Hohenstatt, Director Transmission Planning, being duly sworn, deposes and says that he has personal knowledge of the matters set forth in the foregoing data requests, and that the answers contained therein are true and correct to the best of his knowledge, information and belief.

  
\_\_\_\_\_  
Timothy J. Hohenstatt, Affiant

Subscribed and sworn to before me by Timothy J. Hohenstatt on this 12<sup>th</sup> day of March 2020.



  
\_\_\_\_\_  
NOTARY PUBLIC Paula M. Roseman

My Commission Expires: 3-17-25

**KY Administrative Case No. 387**  
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**REQUEST:**

Actual and weather-normalized monthly coincident peak demands for the just completed calendar year. Demands should be disaggregated into (a) native load demand (firm and non-firm) and (b) off-system demand (firm and non-firm).

**RESPONSE:**

<b>Duke Energy Kentucky Electric Energy Demands - MW</b>				
	<b>Native Peak</b>	<b>Internal* Peak</b>	<b>Weather Normal Internal Peak</b>	<b>Total</b>
Jan-19	821	821	778	778
Feb-19	680	680	691	691
Mar-19	707	707	646	646
Apr-19	576	576	616	616
May-19	730	730	667	667
Jun-19	792	792	764	764
Jul-19	817	817	865	865
Aug-19	837	837	841	841
Sep-19	824	824	769	769
Oct-19	808	808	630	630
Nov-19	662	662	645	645
Dec-19	742	742	702	702

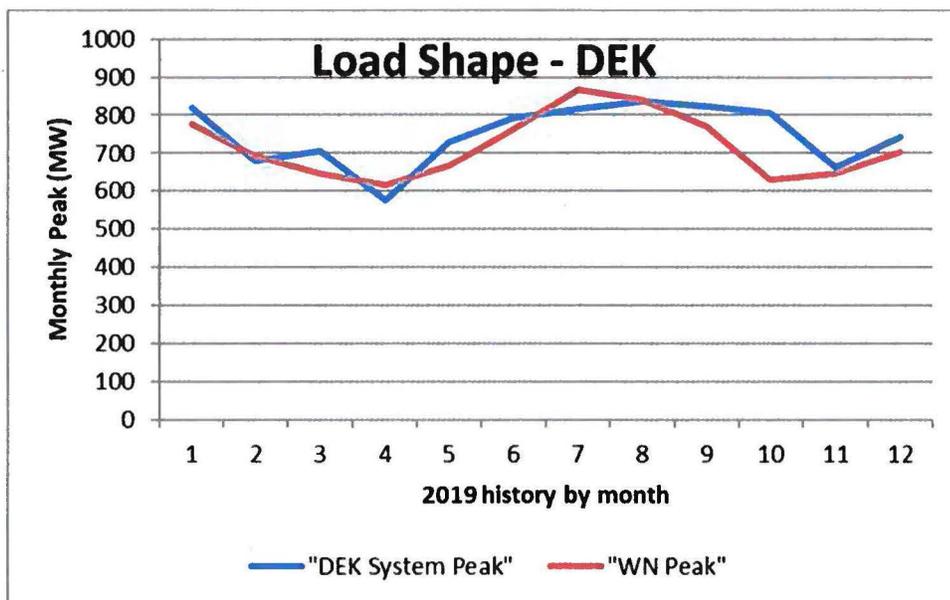
\*Please note that reported figures do not include any demand response measures; data for these is not available as of this writing.

**PERSON RESPONSIBLE:** Benjamin Passty

**REQUEST:**

Load shape curves that show actual peak demands and weather-normalized peak demands (native load demand and total demand) on a monthly basis for the just completed calendar year.

**RESPONSE:**



**PERSON RESPONSIBLE:** Benjamin Passty

**REQUEST:**

Based on the most recent demand forecast, the base case demand and energy forecasts and high case demand and energy forecasts and high case demand and energy forecasts for the current year and the following four years. The information should be disaggregated into (a) native load (firm and non-firm demand) and (b) off-system load (both firm and non-firm demand).

**RESPONSE:**

<b>Duke Energy Kentucky – Native Load Forecast</b>				
	<b>Demand – MW</b>		<b>Energy - GWH</b>	
	<b>Base</b>	<b>High</b>	<b>Base</b>	<b>High</b>
<b>2020</b>	<b>841</b>	<b>925</b>	<b>4,032</b>	<b>4,411</b>
<b>2021</b>	<b>866</b>	<b>953</b>	<b>4,192</b>	<b>4,592</b>
<b>2022</b>	<b>870</b>	<b>958</b>	<b>4,196</b>	<b>4,596</b>
<b>2023</b>	<b>874</b>	<b>962</b>	<b>4,205</b>	<b>4,606</b>
<b>2024</b>	<b>876</b>	<b>964</b>	<b>4,391</b>	<b>4,809</b>

<b>Duke Energy Kentucky – Non-Firm Electric Forecast</b>				
	<b>Demand – MW</b>		<b>Energy - MWH</b>	
	<b>Base</b>	<b>High</b>	<b>Base</b>	<b>High</b>
<b>2018</b>	<b>n/a</b>	<b>n/a</b>	<b>n/a</b>	<b>n/a</b>
<b>2019</b>	<b>n/a</b>	<b>n/a</b>	<b>n/a</b>	<b>n/a</b>
<b>2020</b>	<b>n/a</b>	<b>n/a</b>	<b>n/a</b>	<b>n/a</b>
<b>2021</b>	<b>n/a</b>	<b>n/a</b>	<b>n/a</b>	<b>n/a</b>
<b>2022</b>	<b>n/a</b>	<b>n/a</b>	<b>n/a</b>	<b>n/a</b>

**PERSON RESPONSIBLE:** Benjamin Passty

**REQUEST:**

The target reserve margin currently used for planning purposes, stated as a percentage of demand. If changed from what was in use in 2001, include a detailed explanation for the change.

**RESPONSE:**

As was used in the 2018 IRP, Duke Energy Kentucky will use a planning reserve margin of 13.7%. Duke Energy Kentucky plans for a prudent long-term target reserve margin (typically in the 13%-17% range). But as a participant in PJM, Duke Energy Kentucky must also satisfy a separate PJM prescribed reserve margin requirement as part of its near-term RTO wide capacity planning. These two requirements while similar in name and concept are not precisely the same metric nor are they calculated the same way. Duke Energy Kentucky is evaluating the need to increase its target reserve margin to account for long term resource adequacy as well as the near-term PJM capacity requirements.

**PERSON RESPONSIBLE:** Scott Park

**REQUEST:**

Projected reserve margins stated in megawatts and as a percentage of demand for the current year and the following 4 years. Identify projected deficits and current plans for addressing these. For each year identify the level of firm capacity purchases projected to meet native load demand.

**RESPONSE:**

Projected reserve margins are calculated as follows:

$$\text{Reserve Margin (MW)} = \text{Generating Capacity} - \text{Peak Demand} - \text{Demand Response}$$

$$\text{Reserve Margin (\%)} = (\text{Generating Capacity} / (\text{Peak Demand} - \text{Demand Response})) - 1$$

Year	Projected Reserves (MW)	Projected Reserve Margin (%)
2020	230	27%
2021	191	21%
2022	158	17%
2023	147	16%
2024	134	14%

This data reflects the Fall 2019 Load Forecast and addition of 7 MW of solar to the Duke Energy Kentucky generating fleet. The current fleet consists of the 600 MW East Bend 2 and 476 MW Woodsdale generating stations plus 7 MW solar.

**PERSON RESPONSIBLE:** Scott Park





**Duke Energy Kentucky  
Administrative Case No. 387  
March 31, 2020**

**STAFF-DR-01-012**

**REQUEST:**

Identify all planned base load or peaking capacity additions to meet native load requirements over the next 10 years. Show the expected in-service date, size and site for all planned additions. Include additions planned by the utility, as well as those by affiliates, if constructed in Kentucky or intended to meet load in Kentucky.

**RESPONSE:**

There are currently no planned base load capacity additions forecasted for the next 10 years. Duke Energy Kentucky continually evaluates its needs for additional base or peaking capacity based upon annual load projections. No decision has been made at this time.

**PERSON RESPONSIBLE:** Scott Park

**REQUEST:**

The following transmission energy data for the just completed calendar year and the forecast for the current year and the following four years:

- a. Total energy received from all interconnections and generation sources connected to the transmission system.
- b. Total energy delivered to all interconnections on the transmission system.
- c. Peak load capacity of the transmission system.
- d. Peak demand for summer and winter seasons on the transmission system.

**RESPONSE:**

a.

Year	Month	Total Energy Received
2019	January	407,519
	February	342,264
	March	362,072
	April	303,880
	May	349,511
	June	370,991
	July	450,898
	August	427,350
	September	402,524
	October	328,461
	November	339,791
	December	405,078
2019 Total		4,490,340

- b. There were 244,001 MWh delivered to the transmission system from Duke Energy Kentucky.
- c. Neither Duke Energy Kentucky nor the electric utility industry has defined a term “peak load capacity of the transmission system.” There is no single number that defines the capacity of a transmission system due to the interconnected nature of the electric grid. Duke Energy Kentucky does perform assessments of its transmission system to ensure all firm loads can be served in a reliable manner. This ensures that the transmission system has the capacity required to reliably serve the load.
- d. **SUMMER PEAK**

<b>Date</b>	<b>Hour</b>	<b>MW's</b>
August 19, 2019	17	837

**WINTER PEAK**

<b>Date</b>	<b>Hour</b>	<b>MW's</b>
January 31, 2019	8	821

**PERSON RESPONSIBLE:** Doug Hils – a., b., d.  
 Tim Hohenstatt – c.

**REQUEST:**

Identify all planned transmission capacity additions for the next 10 years. Include the expected in-service date, size and site for all planned additions and identify the transmission need each addition is intended to address.

**RESPONSE:**

The following transmission capacity additions are planned with planned in-service dates indicated:

- Aero Substation – install 138 kV switching facilities to terminate two 138 kV lines and serve four 138-12.47 kV distribution supply transformers. Planned in-service Date: 12/31/2020
- Oakbrook Substation – Expand the existing Oakbrook Substation, install a 138-69 kV, 150 MVA transformer. Planned in-service Date: 12/31/2020
- Woodspoint to Aero 138 kV line – erect a single circuit 138 kV line from Woodspoint Substation to Aero Substation, approximately 1.5 miles in length. Planned in-service Date: 12/31/2020
- Aero to Oakbrook 138 kV line – erect a single circuit 138 kV line from Woodspoint Substation to Aero Substation, approximately 1.1 miles in length. Planned in-service Date: 06/01/2021.
- Hebron to Oakbrook 69 kV line – erect a single circuit 69 kV line from Hebron Substation to the vicinity of St. Route 237 and Northside Drive,

approximately 1.1 miles in length. Rebuild/upgrade the capacity of a section of an existing 69 kV line from Limaburg Substation south to St. Route 18, approximately 1.4 miles in length. (Note that at the time of submission of this response, these projects are conceptual in nature.) Planned in-service Date: 06/01/2023.

The purpose of the above planned projects is to provide service to the Duke Energy Kentucky transmission and distribution systems to serve load growth in Boone County, in the vicinity of the Cincinnati/Northern Kentucky International Airport.

**PERSON RESPONSIBLE:** Tim Hohenstatt