

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 CLOSE ITS EAST	)	CASE NO.
LANDFILL AT THE EAST BEND GENERATING	)	2021-00290
STATION AND FOR APPROVAL TO AMEND	)	
ITS ENVIRONMENTAL COMPLIANCE PLAN	)	
FOR RECOVERY BY ENVIRONMENTAL	)	
SURCHARGE MECHANISM	)	

COMMISSION STAFF'S FIRST 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 an electronic version of the following information. The information requested is due on October 25, 2021. 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 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

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<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).

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 Duke Kentucky obtains information that indicates 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 Direct Testimony of Adam S. Deller (Deller Direct Testimony), Attachment ASD-1. Explain whether Duke Kentucky will track the East Landfill closure costs in enough detail to provide quarterly reports that compare the estimates with actuals in the categories provided in this exhibit.

2. Refer to the Deller Direct Testimony, attachment ASD-2 and ASD-3. Provide an explanation or justification for the post-closure care costs provided in ASD-2 and ASD-3.

3. Refer to the Deller Direct Testimony, Attachment ASD-3. Provide an itemized estimate of Routine Maintenance.

4. Refer to the Application, paragraph 15 and the Direct Testimony of Theodore H. Czupik Jr., page 5, lines 12–16.

a. State whether the ongoing maintenance costs or associated Asset Retirement Obligations (ARO) for the West Landfill are currently incurred by Duke Kentucky. If so, explain how these costs are currently accounted for by Duke Kentucky.

b. Confirm that Duke Kentucky does not currently recover any ongoing maintenance costs or associated ARO for the West Landfill in base rates. If this cannot be confirmed, provide the amount of these costs recovered in base rates.



Linda C. Bridwell, PE  
Executive Director  
Public Service Commission  
P.O. Box 615  
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DATED OCT 12 2021

cc: Parties of Record

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