

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 II RATES AND FOR TARIFF	)	2025-00258
APPROVAL	)	

COMMISSION STAFF'S FOURTH REQUEST FOR INFORMATION
TO DUKE 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 December 4, 2025. 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 person supervising the preparation of the response on behalf of the entity that 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).

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), page 8, lines 17–18, through page 9, lines 1–8 and Confidential Attachment BLS-1, Tab 2 (Avoided Energy).

a. State whether Duke Energy can recalculate the system losses to be reflective of the relative hours when solar generation is operating in a comparable manner as it calculated the avoided energy costs.

b. If so, calculate the system losses to be reflective of the relative hours when solar generation is operating.

2. Refer to Sailors Direct Testimony, page 11, lines 16–22, through page 12, lines 1–2.

a. Explain whether Duke Kentucky considered calculating the avoided transmission costs based on the PJM market costs for transmission service.

b. If not, explain why not.

c. Explain why Duke Kentucky believes that its proposed approach is more reflective of the avoided transmission costs arising from behind the meter solar.

d. Calculate the avoided transmission costs based on the PJM market costs for transmission service. Include the workpapers in Excel spreadsheet format with all formulas, columns, and rows unprotected and fully accessible.

3. Refer to Duke Kentucky's responses to Commission Staff's Second Request for Information (Staff's Second Request), Item 8, Confidential Attachment, and the Direct Testimony of John D. Swez (Swez Direct Testimony), page 18, line 17 through page 19, line 18.

a. State if the following PJM Billing Line Items would be either impacted by a change in PJM market participant load ratio share as a result of behind the meter solar, or behind the meter solar would otherwise cause a reduction in costs from PJM not already accounted for in another avoided cost category.

(1) 1230 – Inadvertent Interchange

(2) 1242 – Day-Ahead Load Response Charge Allocation

(3) 1243 – Real-Time Load Response Charge Allocation

- (4) 1246 – Load Response Test Reduction
- (5) 1301 – PJM Scheduling, System Control and Dispatch Service – Control Area Administration
- (6) 1302 -- PJM Scheduling, System Control and Dispatch Service – FTR Administration
- (7) 1303 -- PJM Scheduling, System Control and Dispatch Service – Market Support
- (8) 1305 -- PJM Scheduling, System Control and Dispatch Service – Capacity Resource / Obligation Management
- (9) 1313 – PJM Settlement, Inc.
- (10) 1314 – Market Monitoring Unit (MMU) Funding
- (11) 1315 – FERC Annual Charge Recovery
- (12) 1316 – Organization of PJM States, Inc. (OPSI) Funding
- (13) 1317 – North American Electric Reliability Corporation (NERC)
- (14) 1318 – Reliability First Corporation (RFC)
- (15) 1319 – Consumer Advocates of PJM States, Inc. (CAPS)
- (16) 1320– Transmission Owner Scheduling, System Control and Dispatch Service
- (17) 1330 – Reactive Supply and Voltage Control from Generation and Other Sources Service
- (18) 1340 – Regulation and Frequency Response Service
- (19) 1360 – Synchronized Reserve

(20) 1361 – Secondary Reserve

(21) 1362 – Non-Synchronized Reserve

b. If the answer of any of the above items is yes, calculate the avoided cost per kWh of solar energy produced from behind the meter solar.

c. If the answer of any of the above items is no, explain why Duke Kentucky believes that costs for those Billing Line Items would not be avoided from behind the meter solar.

4. Refer to Swez Direct Testimony, page 18, line 17, through page 19, line 18. Provide the monthly MWh billing determinant from PJM for the months of October 2024 through September 2025.



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DATED NOV 24 2025

cc: Parties of Record

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