

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 FIFTH REQUEST FOR INFORMATION
TO DUKE ENERGY KENTUCKY, INC.

Duke Kentucky Energy 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 January 6, 2026. 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 Duke Kentucky's response to Commission Staff's Second Request for Information (Staff's Second Request), Item 4.

- a. Explain whether Duke Kentucky would consider updating the Avoided Cost Excess Generation Credit (ACEGC) on an every-two year or every-three year cadence on a formulaic basis.

b. Explain whether there are any elements of the ACEGC that could not be formulaically updated on a regular basis once a methodology has been determined in this instant proceeding?

2. Refer to Duke Kentucky's response to Staff's Second Request, Item 6(b).

a. Provide an avoided Transmission capacity value that is calculated from the last three years (2022-2024) of actual Duke Energy Kentucky System Peak Loads as provided in the response, and behind the meter solar expected contribution to the monthly peak hour (ratio of generation in that hour compared to nameplate based on the PV Watts profile used to calculate the avoided energy costs) in months with the four highest peaks per year. Include in the response all workpapers in excel format with all cells visible and unprotected.

b. Explain whether calculating an avoided transmission cost in this manner would be reasonable to Duke Kentucky. If not, explain why not and propose alternative assumptions and calculations for any element that is not reasonable in Duke Kentucky's estimation.

c. Provide an avoided distribution capacity value that is calculated based on the behind-the-meter solar-expected capacity contribution (ratio of generation in that hour compared to nameplate based on the PV Watts profile used to calculate the avoided energy costs) for an average of the four highest load hours for a typical residential and a typical commercial feeder across the months of July to September as provided in the response to Staff's Second Request, Item 6(d). Average those avoided distribution capacity values for a residential and commercial feeder based on a weighting for each

class to determine an average solar avoided distribution capacity cost. Include in the response all workpapers in excel format with all cells visible and unprotected.

d. Explain whether calculating an avoided Distribution cost in this manner would be reasonable? If not, please explain why not and propose alternative assumptions and calculations for any element that is not reasonable in Duke Kentucky's estimation.

3. Refer to Duke Kentucky's response to Commission Staff's Fourth Request (Staff's Fourth Request), Item 1 and Staff's Second Request, Item7(a) Attachment. Using the hourly data contained in Staff's Second Request, Item7(a) Attachment, provide an annual system loss value that is limited to the daylight hours when solar is generating. Include in the response all workpapers in excel format with all cells visible and unprotected.

4. Refer to Duke Kentucky's notice requesting that this matter be taken under submission and decided based upon the written record. State whether Duke Kentucky continues to request that this matter be taken under submission and decided based upon the written record.



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

DATED DEC 19 2025

cc: Parties of Record

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

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

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

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

*Sheena McGee Leach
Duke Energy Kentucky, Inc.
139 East Fourth Street
Cincinnati, OH 45201