

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

IN THE MATTER OF The Electronic Application of Duke Energy :  
Kentucky, Inc., for: 1) An Adjustment of the Electric Rates; 2 Approval :  
of an Environmental Compliance Plan and Surcharge : Case No. 2017-00321  
Mechanism; 3) Approval of New Tariffs; 4) Approval of Accounting :  
Practices to Establish Regulatory Assets and Liabilities; and 5) All Other :  
Required Approvals and Relief :

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**SECOND SET OF DATA REQUESTS OF THE KROGER CO.  
TO DUKE ENERGY KENTUCKY, INC.**

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**COUNSEL FOR THE KROGER CO.**

Dated: November 29, 2017

## DEFINITIONS

1. “Document” means the original and all copies (regardless of origin and whether or not including additional writing thereon or attached thereto) of memoranda, reports, books, manuals, instructions, directives, records, forms, notes, letters, notices, confirmations, telegrams, pamphlets, notations of any sort concerning conversations, telephone calls, meetings or other communications, bulletins, transcripts, diaries, analyses, summaries, correspondence investigations, questionnaires, surveys, worksheets, and all drafts, preliminary versions, alterations, modifications, revisions, changes, amendments and written comments concerning the foregoing, in whatever form, stored or contained in or on whatever medium, including computerized memory or magnetic media.
2. “Study” means any written, recorded, transcribed, taped, filmed, or graphic matter, however produced or reproduced, either formally or informally, a particular issue or situation, in whatever detail, whether or not the consideration of the issue or situation is in a preliminary stage, and whether or not the consideration was discontinued prior to completion.
3. “Person” means any natural person, corporation, professional corporation, partnership, association, joint venture, proprietorship, firm, or the other business enterprise or legal entity.
4. A request to identify a natural person means to state his or her full name and residence address, his or her present last known position and business affiliation at the time in question.
5. A request to identify a document means to state the date or dates, author or originator, subject matter, all addressees and recipients, type of document (e.g., letter, memorandum, telegram, chart, etc.), number of code number thereof or other means of identifying it, and its present location and custodian. If any such document was, but is no longer in the Company’s possession or subject to its control, state what disposition was made of it.
6. A request to identify a person other than a natural person means to state its full name, the address of its principal office, and the type of entity.
7. “And” and “or” should be considered to be both conjunctive and disjunctive, unless specifically stated otherwise.
8. “Each” and “any” should be considered to be both singular and plural, unless specifically stated otherwise.
9. Words in the past tense should be considered to include the present, and words in the present tense include the past, unless specifically stated otherwise.
10. “You” or “your” means the person whose filed testimony is the subject of these interrogatories and, to the extent relevant and necessary to provide full and complete answers to any request, “you” or “your” may be deemed to include any person with information relevant to any interrogatory who is or was employed by or otherwise associated with the witness or who assisted, in any way, in the preparation of the witness’ testimony.
11. “Company” means Duke Energy Kentucky, Inc. (“Duke”) and/or any of their officers, directors, employees or agents who may have knowledge of the particular matter addressed, and affiliates.

## INSTRUCTIONS

1. If any matter is evidenced by, referenced to, reflected by, represented by, or recorded in any document, please identify and produce for discovery and inspection each such document.
2. These interrogatories are continuing in nature, and information which the responding party later becomes aware of, or has access to, and which is responsive to any request is to be made available to The Kroger Co. Any studies, documents, or other subject matter not yet completed that will be relied upon during the course of this case should be so identified and provided as soon as they are completed. The Respondent is obliged to change, supplement and correct all answers to interrogatories to conform to available information, including such information as it first becomes available to the Respondent after the answers hereto are served.
3. Unless otherwise expressly provided, each interrogatory should be construed independently and not with reference to any other interrogatory herein for purpose of limitation.
4. The answers provided should first restate the question asked and also identify the person(s) supplying the information.
5. Please answer each designated part of each information request separately. If you do not have complete information with respect to any interrogatory, so state and give as much information as you do have with respect to the matter inquired about, and identify each person whom you believe may have additional information with respect thereto.
6. In the case of multiple witnesses, each interrogatory should be considered to apply to each witness who will testify to the information requested. Where copies of testimony, transcripts or depositions are requested, each witness should respond individually to the information request.
7. The interrogatories are to be answered under oath by the witness(es) responsible for the answer.
8. Responses to requests for revenue, expense and rate base data should provide data on the basis of Total company as well as Intrastate data, unless otherwise requested.

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Mechanism; 3) Approval of New Tariffs; 4) Approval of :  
Accounting Practices to Establish Regulatory Assets and :  
Liabilities; and 5) All Other Required Approvals and Relief :

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Q.2-1. Refer to the Normalization of Planned Outage O&M WPD-2.33a which utilizes four years of actual data from 2013-2016 and two years of projected data for years 2017-2018 to normalize the Planned Outage O&M. Also refer to The Annualization of East Bend Maintenance Expense WPD-2.30a which utilizes the 5-year average of actual data from 2012-2016.

- a. Please explain why a different time period was used to annualize the East Bend Maintenance costs than the time period that was used to normalize the Planned Outage O&M. Please explain why this difference is appropriate.
- b. Please provide the actual Planned Outage O&M costs for the years 2006 to 2012. Please recalculate the Adjusted Planned Outage O&M that would result from utilizing the same 5-year average time period from 2012 to 2016 that was used to annualize the East Bend Maintenance Expense.
- c. Please provide the actual East Bend Maintenance costs for the years 2006 to 2011 and projected costs for 2017 and 2018. Please recalculate the adjusted East Bend Maintenance expense that would result from utilizing the same 6-year average time period from 2013 to 2018 that was used to normalize the Planned Outage O&M.
- d. Do the East Bend Maintenance Costs shown in WPD-2.30a include any of the East Bend Planned Outage O&M costs shown in in WPD-2.33a?
  - i. Does the Adjusted Planned Outage O&M adjustment double count part of the East Bend Maintenance Cost adjustment? If not, please explain why.

Q.2-2. Refer to section D workpapers WPD-2.28b, WPD-2.30b, and WPD-2.33b on Consumer Price Index which are used for the annualization of Fuel Related PJM Charges and Credits, East Bend Maintenance Expense, and Planned Outage O&M.


- a. Please confirm these Consumer Price Index calculations are used to adjust actual expenses for inflation. If not, please explain how these Consumer Price Index numbers are used.

- b. Please recalculate the adjustments that would result for the annualization of Fuel Related PJM Charges and Credits, East Bend Maintenance Expense, and Planned Outage O&M if no adjustments were made based on the Consumer Price Index.

Q.2-3. Please list all other adjustments that were made to actual data based on inflation, cost escalation, or the Consumer Price Index that impact the requested revenue requirement in this filed case.

- a. If any adjustments to actual data were made based on inflation, cost escalation, or the Consumer Price Index, please quantify the amount of those adjustments.

Respectfully submitted,



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