COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF DUKE ENERGY	)	
KENTUCKY, INC. FOR: 1) AN ADJUSTMENT	)	
OF THE ELECTRIC RATES; 2) APPROVAL OF	)	
AN ENVIRONMENTAL COMPLIANCE PLAN	)	
AND SURCHARGE MECHANISM; 3) APPROVAL	)	CASE NO.
OF NEW TARIFFS; 4) APPROVAL OF ACCOUNTING	)	2017-00321
PRACTICES TO ESTABLISH REGULATORY ASSETS	)	
AND LIABILITIES; AND 5) ALL OTHER REQUIRED	)	
APPROVALS AND RELIEF	)	

ATTORNEY GENERAL'S RESPONSES TO DATA REQUESTS OF THE KENTUCKY PUBLIC SERVICE COMMISSION STAFF

Comes now the intervenor, the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention, and submits the following responses to data requests of the Kentucky Public Service Commission Staff in the above-styled matter.

Respectfully submitted,

ANDY BESHEAR
ATTORNEY GENERAL

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WITNESS/RESPONDENT RESPONSIBLE:
Lane Kollen

QUESTION No. 1
Page 1 of 1

Refer to the Direct Testimony of Lane Kollen ("Kollen Testimony"), pages 5 and 10, regarding off system sales ("OSS") margins. In the table on page 5, the adjustment for OSS margins is $3.826 million. On page 10 the OSS margins adjustment is $3.836 million. State the correct amount for OSS margins.

RESPONSE:

The reference on p. 10 of $3.836 million should be $3.826 million. This was a typo. The $3.826 million amount provided in the table on p. 5 is correct, and corresponds to the amount provided in Mr. Kollen's workpapers.

WITNESS/RESPONDENT RESPONSIBLE:
Lane Kollen

QUESTION No. 2
Page 1 of 1

Refer to the Kollen Testimony, page 6, line 9, through page 7, line 16. Refer also to Duke Energy Kentucky, Inc.'s ("Duke Kentucky") application, the Direct Testimony of John D. Swez ("Swez Testimony"), page 16, line 6, through page 19, line 18. State whether the RSG Rev- MISO Make Whole revenues discussed in the Kollen Testimony are the same revenues that are credited through the fuel adjustment clause as discussed in the Swez Testimony. If the revenue discussed in the Kollen testimony differs from the type of revenue discussed in the Swez Testimony, explain Mr. Kollen's understanding of the difference.

RESPONSE:

Yes, for the retail allocation of the make whole revenues. Mr. Kollen no longer supports this adjustment. Refer to the responses to Duke questions 33 and 34.

WITNESS/RESPONDENT RESPONSIBLE:
Counsel as to objection/Lane Kollen

QUESTION No. 3
Page 1 of 1

Refer to the Kollen Testimony, page 28 and Duke Kentucky's responses to Commission Staff's Second Request for Information, Items 27 and 33, regarding the amortization of the East Bend Operations & Maintenance Regulatory Asset (O&M Regulatory Asset").

a. Does the AG consider the proposed ten-year amortization period for the O&M Regulatory Asset to be reasonable?
b. Explain the reason(s) why the O&M Regulatory Asset should or should not be amortized over the 23.5-year remaining life of East Bend.
c. Provide the impact on the amortization expense and revenue requirement if the O&M Regulatory Asset is amortized over a 23.5-year period.

RESPONSE:

a. Mr. Kollen believes 10-years is reasonable. However, a longer period also would be reasonable. Objection, insofar as the question asks the AG's opinion. The Attorney General did not provide testimony in this matter, and as an attorney, is not prepared to individually respond to data requests in this matter.

b. One reason is that the O&M expense deferral is akin to an additional cost in excess of the purchase price. Another reason is to have a consistent amortization period for the East Bend deferred O&M expense and depreciation expense. Yet another reason is that it reduces the cost to customers over the next ten years, although it does increase the cost to customers thereafter, all in nominal dollar terms. The net present value is the same, assuming that the same debt only rate of return is used for the discount rate.

c. The effect of adjusting the amortization period to 23.5 years is a reduction in the levelized amortization expense of $2,398,214 and the revenue requirement of $2,404,818 compared to the Company's filing. See the attached file, "Staff 1-3c-Attachment.xlsx" for the quantification.

WITNESS/RESPONDENT RESPONSIBLE:
Lane Kollen

QUESTION No. 4
Page 1 of 1

Refer to the Kollen Testimony, page 33, lines 4-17. Provide any studies which support the use of the ALG methodology over the ELG methodology.

RESPONSE:

Mr. Kollen is unaware of any studies that support the use of the ALG methodology over the ELG methodology or vice versa.

WITNESS/RESPONDENT RESPONSIBLE:
Lane Kollen

QUESTION No. 5
Page 1 of 2

Refer to the Kollen Testimony, pages 55-56 and 59-60, and Staff's Second Request, Item 33, regarding the East Bend Coal Ash Regulatory Asset ("ARO").

a. Confirm that the ARO should be removed from capitalization because Duke Kentucky proposes to recover the costs and earn a return on the unamortized balance through the Environmental Surcharge Mechanism.
b. Confirm that the ARO should be amortized over ten years and recovered through the Environmental Surcharge Mechanism.
c. Confirm that costs currently deferred to the ARO should instead be recovered through the Environmental Surcharge Mechanism in the second month after they are incurred.
d. Refer specifically to page 60, lines 14-17. Explain whether the unamortized balance of the ARO should be included in the Environmental Surcharge Mechanism rate base.
e. Explain the reason(s) why the ARO should or should not be amortized over the 23.5-year remaining life of East Bend.
f. Provide the impact on the amortization expense and revenue requirement if the ARO is amortized over 23.5 years.

RESPONSE:

a. Confirmed.
b. Confirmed, although the rate base amount should be limited to the costs actually spent, excluding all forecasts costs, less any amortization, and less ADIT. The Commission could consider a longer amortization period, perhaps the 23.5 years remaining life for East Bend, although Mr. Kollen did not address this aspect of the environmental surcharge revenue requirement.
c. Confirmed, although to be clear, it is the amortization of and return on that should be recovered starting the second month after the cost is incurred, not the entirety of the cost in a single month.
d. Refer to the response to part (b) of this question.
e. Refer to the response to part (b) of this question. Refer to the response to question 3(b) for reasons why it would be appropriate to extend the amortization period from 10 years to 23.5 years.
f. The calculated effect for the first year based on last available actual costs provided from October 2017 and a reduction for ADIT is a levelized revenue

requirement of $1.010 million. See the attached file for the quantification. The calculation assumes no reduction for prior amortization costs since it represents the first-year determination. The methodology is different than that used by the Company for its proposed 10-year amortization. First, the Company included future costs that have not yet been spent. Second, the Company failed to reduce the rate base investment for ADIT, which overstates the return on component of the levelized revenue requirement.

Attachment:
Staff1-5F-Attachment.xlxs

WITNESS/RESPONDENT RESPONSIBLE:
Glenn A. Watkins

QUESTION No. 6 [1]
Page 1 of 1

Refer to the Direct Testimony of Glenn A. Watkins ('Watkin's Testimony"), page 13, lines 5-7. Provide studies that support Mr. Watkins' assertion that the Probability of Dispatch method is the most theoretically correct and most equitable method.

RESPONSE:

No studies are required to support Mr. Watkins' opinion that the Probability of Dispatch method is the most theoretically correct and most equitable method. Mr. Watkins' provides a detailed explanation forming the basis of his opinion on page 13, lines 7 through 31.

[1] The Commission's Data Requests to the Attorney General were mistakenly mis-numbered, having included two (2) questions numbered as question no. 5. The questions are being set forth in their proper sequence and numbering in the instant responses.

WITNESS/RESPONDENT RESPONSIBLE:
Glenn A. Watkins

QUESTION No. 7 [2]
Page 1 of 1

Provide a copy of the two cost-of-service studies prepared by Mr. Watkins in Excel format, with the formulas intact and unprotected.

RESPONSE:

See attached files:

- CCOSS-BIP.xls
- CCOSS-P&A.xls
- BIP Analysis-GAW-3.xls
- P&A-GAW-4.xls

[2] The Commission's Data Requests to the Attorney General were mistakenly mis-numbered, having included two (2) questions numbered as question no. 5. The questions are being set forth in their proper sequence and numbering in the instant responses.

WITNESS/RESPONDENT RESPONSIBLE:
Glenn A. Watkins

QUESTION No. 8 [3]
Page 1 of 1

Refer to the Watkins Testimony, page 25, line 15, through page 27, line 2 wherein Mr. Watkins takes issue with the allocation of the requested revenue increase by Duke Kentucky to four rate classes. Provide the total revenue increase allocation that Mr. Watkins believes would be appropriate to each rate class.

RESPONSE:

Mr. Watkins did not conduct an alternative class revenue distribution for all classes in this case. Furthermore, Mr. Watkins did not "take issue" with the allocation of the requested revenue increase for other classes. As indicated in his testimony, Mr. Watkins finds that the Company's proposed increase to the residential class is reasonable (given the Company's requested overall increase). In addition, and as indicated in his testimony, Mr. Watkins has observed what appears to be several anomalous results for some of the non-residential classes but Mr. Watkins has not made any recommendations as to how these non-residential class revenues should be apportioned.

[3] The Commission's Data Requests to the Attorney General were mistakenly mis-numbered, having included two (2) questions numbered as question no. 5. The questions are being set forth in their proper sequence and numbering in the instant responses.

WITNESS/RESPONDENT RESPONSIBLE:
Glenn A. Watkins

QUESTION No. 9 [4]
Page 1 of 2

Refer to the Watkins Testimony, pages 28 through page 31, line 7. Mr. Watkins describes pricing in a competitive market, short-run and long-run costs, and efficient pricing.

a. Under the competitive market economic theory, in the long run economic profits are zero. State whether Mr. Watkins believes that prices should be set such that Duke Kentucky receives zero economic profits.
b. State whether a natural monopoly such as Duke Kentucky can remain economically viable while pricing its goods or services at a rate at which price equals marginal cost.
c. Explain when or how Duke Kentucky will reach the long run equilibrium and maximize efficiency.

RESPONSE:

a. The Staff's assertion is that in the long-run, economic profits are zero. This is a fundamental error in that in competitive markets, economic profits (in the long-run) are equal to a firm's cost of capital. Furthermore, in competitive markets, there are no monopolistic profits, but only economic profits. As such, Mr. Watkins is of the opinion that Duke Energy is entitled to have the opportunity to recover its cost of providing service and have an opportunity to earn a fair rate of return on its capital employed; i.e., earn economic profits associated with shareholder investments.
b. Under pure competition, a firm will operate where marginal cost equals marginal revenue and will price its good or service at marginal cost. This price will then enable the firm to recover its economic profit (with no monopoly profit). A full explanation of this accepted economic theory and mathematical proof would require a large portion of a micro-economics textbook. With regard to regulated utilities, such as Duke, it is well known that in those states that utilize marginal cost pricing, marginal costs are adjusted (upwards or downwards) so that revenues equal the utility's embedded cost of service. Mr. Watkins has not conducted a

[4] The Commission's Data Requests to the Attorney General were mistakenly mis-numbered, having included two (2) questions numbered as question no. 5. The questions are being set forth in their proper sequence and numbering in the instant responses.

QUESTION No. 9 [5]
Page 2 of 2

marginal cost of service study relating to Duke. Therefore, it is uncertain as to whether Duke's total marginal costs are greater than or less than its overall revenue requirement.

c. Unknown.

[5] The Commission's Data Requests to the Attorney General were mistakenly mis-numbered, having included two (2) questions numbered as question no. 5. The questions are being set forth in their proper sequence and numbering in the instant responses.

WITNESS/RESPONDENT RESPONSIBLE:
Glenn A. Watkins

QUESTION No. 10 [6]
Page 1 of 1

Refer to the Watkins Testimony, page 30, lines 11 - 12. Mr. Watkins states that "[v]olumetric pricing promotes the fairest pricing mechanism to customers and to the utility."

a. State whether Mr. Watkins believe that volumetric sales should be the goal of a utility such as Duke Kentucky.
b. State whether Mr. Watkins believes a rate schedule should incorporate the effects of energy efficiency and conservation, gradualism, and utility principles of safe and reliable energy service.

RESPONSE:

a. Mr. Watkins is of the opinion that residential electric rates should include a modest fixed monthly customer charge that only recovers the cost of connecting and maintaining a customer's account while all other costs are recovered from volumetric energy charges.
b. In general, yes. In this regard, Mr. Watkins is of the belief that rate schedules should incorporate policies that promote the items in the question.

[6] The Commission's Data Requests to the Attorney General were mistakenly mis-numbered, having included two (2) questions numbered as question no. 5. The questions are being set forth in their proper sequence and numbering in the instant responses.

WITNESS/RESPONDENT RESPONSIBLE:
Glenn A. Watkins

QUESTION No. 11 [7]
Page 1 of 1

Refer to the Watkins Testimony, page 31, line 9, through page 33, line 14. State whether Mr. Watkins believes Duke Kentucky's proposed residential customer charge of $11.22 would be considered a "high fixed customer charge rate structure" as discussed on these pages.

RESPONSE:

Mr. Watkins is of the opinion that the Company's proposed residential customer charge of $11.22 is excessive and therefore, can be considered unreasonably "high." In this regard, Duke's residential customer costs are most likely the lowest in the State and are calculated to be less than $4.00 per month. Thus, the Company's proposed customer charge is excessive.

[7] The Commission's Data Requests to the Attorney General were mistakenly mis-numbered, having included two (2) questions numbered as question no. 5. The questions are being set forth in their proper sequence and numbering in the instant responses.

WITNESS/RESPONDENT RESPONSIBLE:
Glenn A. Watkins

QUESTION No. 12 [8]
Page 1 of 1

Refer to the Watkins Testimony, page 36, lines 33-35, which state, "[u]nlike the current budget billing plan, the flat monthly billing charge would be guaranteed for a 12-month period with no true-up" and to page 38, lines 2-3, which state, "[a]s proposed, the Fixed Bill program would provide for a constant "flat" bill to customers regardless of how much energy they consume or when they use this electricity." Refer also to Duke Kentucky's response to Commission Staff's Third Request for Information, Item 10, Attachment, page 3 of 3, which includes the following proposed language for the Fixed Bill option: Customer's usage will be reviewed regularly and significant changes in Customer's consumption behavior may require the Fixed Bill amount to be recalculated before the 12-month period ends. State whether Mr. Watkins still believes that payment under the Fixed Bill option would be guaranteed for 12 months given the proposed language provided in response to Item 10. If not, state whether Mr. Watkins still recommends that the Fixed Bill option be rejected.

RESPONSE:

Mr. Watkins still recommends that the Fixed Bill option be rejected.

[8] The Commission's Data Requests to the Attorney General were mistakenly mis-numbered, having included two (2) questions numbered as question no. 5. The questions are being set forth in their proper sequence and numbering in the instant responses.

WITNESS/RESPONDENT RESPONSIBLE:
Glenn A. Watkins

QUESTION No. 13 [9]
Page 1 of 1

Refer to the Watkins Testimony, page 37, lines 5-23, and page 39, lines 11-36 wherein Mr. Watkins discusses the lack of a specific proposal by Duke Kentucky for the Fixed Bill premium calculation and an inability to determine whether the Fixed Bill would be reasonably estimated. State whether Mr. Watkins would recommend rejection of the Fixed Bill option if the formula for computing the Fixed Bill charge was included in the compliance tariff.

RESPONSE:

That would depend on the specifics of the formula.

[9] The Commission's Data Requests to the Attorney General were mistakenly mis-numbered, having included two (2) questions numbered as question no. 5. The questions are being set forth in their proper sequence and numbering in the instant responses.

WITNESS/RESPONDENT RESPONSIBLE:
Richard A. Baudino

QUESTION No. 14 [10]
Page 1 of 1

Refer to the Direct Testimony of Richard A. Baudino ("Baudino Testimony"), page 5.

a. Provide the most current public utility bond yield.
b. Provide the most current 20-year Treasury bond yield.

RESPONSE:

a. According to Moody's Credit Trends, as of January 24, 2018 the average public utility bond yield was 3.96%.
b. According to data on the federalreserve.gov web site, the yield on the 20-year constant maturity Treasury bond as of January 23, 2018 was 2.77%.

[10] The Commission's Data Requests to the Attorney General were mistakenly mis-numbered, having included two (2) questions numbered as question no. 5. The questions are being set forth in their proper sequence and numbering in the instant responses.

WITNESS/RESPONDENT RESPONSIBLE:
Richard A. Baudino

QUESTION No. 15 [11]
Page 1 of 1

Refer to the Baudino Testimony, page 9. Explain why the current low interest-rate environment favors lower risk regulated utilities.

RESPONSE:

The stock prices of regulated utilities are interest rate sensitive and move inversely with changes in interest rates. As interest rates fall, utility stock prices tend to rise as investors seek out the higher dividend yields of lower risk utility stocks.

[11] The Commission's Data Requests to the Attorney General were mistakenly mis-numbered, having included two (2) questions numbered as question no. 5. The questions are being set forth in their proper sequence and numbering in the instant responses.

WITNESS/RESPONDENT RESPONSIBLE:
Richard A. Baudino

QUESTION No. 16 [12]
Page 1 of 1

Refer to the Baudino Testimony, page 13 and Exhibit RAB-3. Explain whether the expected return on equity ("ROE") of 9-9.5 percent is for Duke Kentucky's electric operations only or electric and gas operations combined.

RESPONSE:

In this case Mr. Baudino estimated the ROE for Duke Kentucky's electric operations.

[12] The Commission's Data Requests to the Attorney General were mistakenly mis-numbered, having included two (2) questions numbered as question no. 5. The questions are being set forth in their proper sequence and numbering in the instant responses.

WITNESS/RESPONDENT RESPONSIBLE:
Richard A. Baudino

QUESTION No. 17 [13]
Page 1 of 1

Refer to the Baudino Testimony, page 15. Mr. Baudino states that utilities face three major risks: business risk, financial risk, and liquidity risk. Provide the level of business, financial, and liquidity risk that Mr. Baudino believes Duke Kentucky faces.

RESPONSE:

Mr. Baudino assumed that the proxy group of utilities he used is reasonably reflective of the total risk of Duke Kentucky's electric operations, given Duke Kentucky's A-/Baa1 bond ratings. Mr. Baudino did not specifically quantify the levels of business, financial, and liquidity risk for Duke Kentucky as such a quantification was not necessary for his ROE analysis in this proceeding.

[13] The Commission's Data Requests to the Attorney General were mistakenly mis-numbered, having included two (2) questions numbered as question no. 5. The questions are being set forth in their proper sequence and numbering in the instant responses.

WITNESS/RESPONDENT RESPONSIBLE:
Richard A. Baudino

QUESTION No. 18 [14]
Page 1 of 1

Refer to the Baudino Testimony, page 53.

a. A yearly cap of a 2.5 percent increase over current authorized tariff rates for Rider DCF is proposed. Explain why 2.5 percent was proposed.
b. A cumulative cap of 5 percent for all rate increases to Rider DCF is proposed. Explain why 5 percent was proposed.

RESPONSE:

a. Mr. Baudino proposed a 2.5% cap based on his judgement as to what a maximum reasonable level of increase should be for a flow-through mechanism such as the proposed DCI. Mr. Baudino would be amenable to a lower cap in order to further protect ratepayers if the Commission so desired.

b. Mr. Baudino proposed a 5% cap based on his judgement as to the maximum total rate increase should be for a flow-through mechanism such as the proposed DCI. Mr. Baudino would be amenable to a lower cap in order to further protect ratepayers if the Commission so desired.

[14] The Commission's Data Requests to the Attorney General were mistakenly mis-numbered, having included two (2) questions numbered as question no. 5. The questions are being set forth in their proper sequence and numbering in the instant responses.

WITNESS/RESPONDENT RESPONSIBLE:
Counsel as to objection/Richard A. Baudino

QUESTION No. 19 [15]
Page 1 of 1

Refer to the Baudino Testimony, page 54. It is proposed that the Rider DCI be limited to a three-year pilot program. State whether the Attorney General would support the Rider DCI as a pilot program until Duke files its next base rate case.

RESPONSE:

Mr. Baudino would not recommend the Commission approve the DCI as a pilot program as it is currently proposed by the Company. Objection, insofar as the question asks the AG's opinion. The Attorney General did not provide testimony in this matter, and as an attorney, is not prepared to individually respond to data requests in this matter.

[15] The Commission's Data Requests to the Attorney General were mistakenly mis-numbered, having included two (2) questions numbered as question no. 5. The questions are being set forth in their proper sequence and numbering in the instant responses.

WITNESS/RESPONDENT RESPONSIBLE:
Richard A. Baudino

QUESTION No. 20 [16]
Page 1 of 1

Refer to the Baudino Testimony, Exhibit RAB-5, page 1. Eversouce is included in the proxy group, yet is in the process of acquiring Aquarion Water. State whether Mr. Baudino supports Duke Kentucky's response regarding the inclusion of Eversouce in the proxy group in their response to the Public Service Commission Secord Request for Information, Item 4d.

RESPONSE:

Mr. Baudino agrees with the Company's response with respect to including Eversource in the proxy group.

[16] The Commission's Data Requests to the Attorney General were mistakenly mis-numbered, having included two (2) questions numbered as question no. 5. The questions are being set forth in their proper sequence and numbering in the instant responses.

WITNESS/RESPONDENT RESPONSIBLE:
Richard A. Baudino

QUESTION No. 21 [17]
Page 1 of 1

Refer to the Baudino Testimony, Exhibit RAB-6, page 2. Provide the average growth rate for earnings and book value.

RESPONSE:

The average growth rates for earnings and book value are 13.05% and 8.57%, respectively.

[17] The Commission's Data Requests to the Attorney General were mistakenly mis-numbered, having included two (2) questions numbered as question no. 5. The questions are being set forth in their proper sequence and numbering in the instant responses.

WITNESS/RESPONDENT RESPONSIBLE:
Richard A. Baudino

QUESTION No. 22 [18]
Page 1 of 1

Refer to the Baudino Testimony. Provide all exhibits in Excel spreadsheet format with all formulas intact and unprotected and all rows and columns accessible.

RESPONSE:

Please refer to the attached Excel spreadsheet "Duke Energy Ky Roe Analysis Dec 21."

[18] The Commission's Data Requests to the Attorney General were mistakenly mis-numbered, having included two (2) questions numbered as question no. 5. The questions are being set forth in their proper sequence and numbering in the instant responses.

WITNESS/RESPONDENT RESPONSIBLE:
Richard A. Baudino

QUESTION No. 23 [19]
Page 1 of 1

In Case No. 2016-00371, the Commission approved an ROE of 9.7 percent for Louisville Gas and Electric Co.[20] Explain whether economic conditions in Duke Kentucky's service territory support an ROE of 8.8 percent as opposed to the 9.7 percent award.

RESPONSE:

Mr. Baudino's recommendation in this case is based on his evaluation of current market conditions and his recommendation of 8.8% for Duke Kentucky reflects those conditions. Mr. Baudino's ROE recommendation for LG&E in 2016-00371 was 9.0%, which is quite close to his recommendation in this case. In Case No. 2016-00371, the Commission Order reflected the modification of a stipulated ROE number, which was 9.75%.

[19] The Commission's Data Requests to the Attorney General were mistakenly mis-numbered, having included two (2) questions numbered as question no. 5. The questions are being set forth in their proper sequence and numbering in the instant responses.

[20] Case No. 2016-00371, Electronic Application of Louisville Gas and Electric Company for an Adjustment of its Electric and Gas Rates and for Certificates of Public Convenience and Necessity (Ky. PSC June 22, 2017).

WITNESS/RESPONDENT RESPONSIBLE:
Counsel as to objection/Richard A. Baudino

QUESTION No. 24 [21]
Page 1 of 1

Explain whether the AG believes that the level of risk in Duke Kentucky's service area is so much less that an ROE 90 basis points lower is justified.

RESPONSE:

Please refer to the response to Question No. 23. Objection, insofar as the question asks the AG's opinion. The Attorney General did not provide testimony in this matter, and as an attorney, is not prepared to individually respond to data requests in this matter.

[21] The Commission's Data Requests to the Attorney General were mistakenly mis-numbered, having included two (2) questions numbered as question no. 5. The questions are being set forth in their proper sequence and numbering in the instant responses.