

**KyPSC Case No. 2019-00006**  
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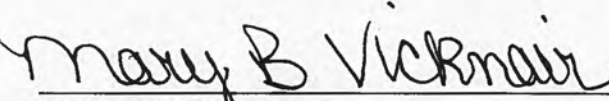
**VERIFICATION**

STATE OF NORTH CAROLINA        )  
  )  
  )        **SS:**  
COUNTY OF MECKLENBURG        )

The undersigned, John D. Swez, Director of General Dispatch & Operations, Power Trading and Dispatch, being duly sworn, deposes and says that he has personal knowledge of the matters set forth in the foregoing data requests, and that the answers contained therein are true and correct to the best of his knowledge, information and belief.

  
\_\_\_\_\_  
John D. Swez, Affiant

Subscribed and sworn to before me by John D. Swez on this 19 day of March, 2019.

  
\_\_\_\_\_  
NOTARY PUBLIC

My Commission Expires:

**MARY B VICKNAIR  
NOTARY PUBLIC  
Davie County  
North Carolina  
My Commission Expires Sept. 21, 2022**

VERIFICATION

STATE OF NORTH CAROLINA )  
 ) SS:  
COUNTY OF MECKLENBURG )

The undersigned, Brett Phipps, Managing Direct – Fuel Procurement, being duly sworn, deposes and says that he has personal knowledge of the matters set forth in the foregoing data requests, and that the answers contained therein are true and correct to the best of his knowledge, information and belief.

*[Handwritten Signature]*  
Brett Phipps, Affiant

Subscribed and sworn to before me by Brett Phipps on this 12 day of March, 2019.

*[Handwritten Signature]*  
NOTARY PUBLIC

My Commission Expires:

MARY B VICKNAIR  
NOTARY PUBLIC  
Davie County  
North Carolina  
My Commission Expires Sept. 21, 2022

**VERIFICATION**

STATE OF OHIO                    )  
  )  
COUNTY OF HAMILTON        )        **SS:**

The undersigned, Theodore H. Czupik, Jr., Rates & Regulatory Strategy Manager, being duly sworn, deposes and says that he has personal knowledge of the matters set forth in the foregoing data requests, and that the answers contained therein are true and correct to the best of his knowledge, information and belief.

Theodore H. Czupik Jr.  
Theodore H. Czupik, Jr., Affiant

Subscribed and sworn to before me by Theodore H. Czupik, Jr., on this 13<sup>TH</sup> day of MARCH, 2019.



**ADELE M. FRISCH**  
Notary Public, State of Ohio  
My Commission Expires 01-05-2024

Adele M. Frisch  
NOTARY PUBLIC

My Commission Expires: 1/5/2024

**REQUEST:**

Refer to the response to Commission Staff's First Request for Information (Staff's First Request), Item 7. Provide an update on the completion of the back-up fuel oil infrastructure project at the Woodsdale units.

**RESPONSE:**

**Hi Level Woodsdale Fuel Oil Project Update as of 3/20/19:**

- Fuel Oil Tanks (Qty: 2)
  - Both tanks are complete and have been commissioned. Started unloading fuel oil into the new fuel oil tanks on 2/12/19 to support unit testing/commissioning activities.
- General Contract Work
  - All mechanical/electrical BOP (Balance of Plant) and units #1 and #2 systems are complete.
  - Piping and electrical to units #3 - #6 is in progress and on schedule to support spring outages for fuel oil tie-in, testing and commissioning and meet the 6/1/19 original completion date.
  - We are still slightly behind schedule due to getting final engineering design later than expected, weather delays and contractor performance during construction. Original 12/21 date of having Units #1 and #2 available to run on fuel oil is now 4/5/19 for unit #1 and 4/19/19 for unit #2.

- Financial
  - Project is currently tracking to the \$55.5M original budget.
- Hi Level Schedule

	<b>Original Baseline</b>	<b>Actual/Current</b>
▪ CPCN Approval	by 4Q 2017	Dec. 2017
▪ Purchase Long Lead Material	12/1/2017	February 2018
▪ Obtain Air permit approval	4/15/2017	October 2017
▪ Construction Begins	2/1/2018	March 2018
▪ Final Engineering Design	3/1/2018	6/30/2018
▪ Unit Outages	4Q 2018 to 1Q 2019	1Q 2019 to 2Q2019
▪ Unit #1 & #2 In Service Date	12/15/2018	4/19/2019
▪ All Construction Complete	4/15/2019	5/10/2019
▪ Unit #3 - #6 In Service Date	4/30/2019	5/31/2019

**PERSON RESPONSIBLE:**            John Swez

**Duke Energy Kentucky  
Case No. 2019-00006  
STAFF Second Set Data Requests  
Date Received: March 11, 2019**

**STAFF-DR-02-002**

**REQUEST:**

Refer to the response to Staff's First Request, Item 9. Provide details on when Duke Kentucky last audited any of its fuel or transportation contracts.

**RESPONSE:**

To date, Duke Energy Kentucky has not audited any of its fuel or transportation contracts.

**PERSON RESPONSIBLE:**        Brett Phipps

**Duke Energy Kentucky  
Case No. 2019-00006  
STAFF Second Set Data Requests  
Date Received: March 11, 2019**

**STAFF-DR-02-003**

**REQUEST:**

Refer to the response to Staff's First Response, Item 22. Provide a table listing the Fuel, Sales, and Fuel Adjustment Clause factor rate for each expense month for the 24 months under review.

**RESPONSE:**

See STAFF-DR-02-003 Attachment.

Please note that the difference between the fuel rate for October 2018 calculated on STAFF-DR-02-003 Attachment is different than the fuel rate calculated on STAFF-DR-01-022 for the following reasons:

- STAFF-DR-02-003 Attachment uses the October 2018 estimated Grand Total Fuel Cost which includes true-ups for prior periods (October 2018 expense month, FAC Schedules 4 – 6).
- The fuel rate in STAFF-DR-01-022 was calculated using the October 2018 final Total Fuel Cost (November 2018 expense month, FAC Schedule 2).

**PERSON RESPONSIBLE:** Ted Czupik



Duke Energy Kentucky  
 Fuel, Sales, Fuel Adjustment Clause Factor  
 November 2016 - October 2018

(1)	(2)	(3)	(4)	(5)=(3)/(4)	(6)	(7)=(5)-(6)
Month	Total Fuel Costs <sup>(a)</sup>	Grand Total Fuel Cost <sup>(b)</sup>	Sales <sup>(c)</sup>	Fuel Rate <sup>(d)</sup>	Base Fuel <sup>(e)</sup>	FAC Factor <sup>(f)</sup>
	(\$)	(\$)	(kWh)	(\$/kWh)	(\$/kWh)	(\$/kWh)
Nov-16	6,991,027.43	6,739,060.36	288,985,005	0.023320	0.029117	(0.005797)
Dec-16	8,812,411.82	8,390,715.12	348,315,447	0.024089	0.029117	(0.005028)
Jan-17	8,187,723.23	7,944,047.33	340,461,039	0.023333	0.029117	(0.005784)
Feb-17	6,994,676.52	6,194,298.10	287,160,082	0.021571	0.029117	(0.007546)
Mar-17	7,262,125.33	6,373,648.86	317,252,437	0.020090	0.029117	(0.009027)
Apr-17	6,394,669.65	5,741,376.21	283,666,941	0.020240	0.029117	(0.008877)
May-17	9,068,545.87	8,199,117.16	312,784,517	0.026213	0.029117	(0.002904)
Jun-17	8,215,033.55	8,808,119.11	353,538,927	0.024914	0.029117	(0.004203)
Jul-17	10,455,734.61	10,836,743.03	391,174,764	0.027703	0.029117	(0.001414)
Aug-17	8,732,814.58	8,918,945.99	373,168,291	0.023901	0.029117	(0.005216)
Sep-17	7,745,348.12	7,722,544.37	317,739,674	0.024305	0.023837	0.000468
Oct-17	6,963,833.19	6,664,385.08	289,878,102	0.022990	0.023837	(0.000847)
Nov-17	7,524,040.56	7,739,579.41	298,880,302	0.025895	0.023837	0.002058
Dec-17	8,430,206.73	8,492,221.14	353,509,454	0.024023	0.023837	0.000186
Jan-18	11,034,276.46	10,530,505.88	381,703,779	0.027588	0.023837	0.003751
Feb-18	7,394,633.36	7,354,447.18	296,114,070	0.024837	0.023837	0.001000
Mar-18	10,704,918.91	11,102,523.13	318,397,259	0.034870	0.023837	0.011033
Apr-18	9,520,528.25	9,662,435.04	283,357,974	0.034100	0.023837	0.010263
May-18	12,681,273.88	12,717,169.00	347,890,413	0.036555	0.023837	0.012718
Jun-18	11,289,704.32	9,828,287.76	370,037,555	0.026560	0.023837	0.002723
Jul-18	9,992,178.66	9,407,247.35	389,400,238	0.024158	0.023837	0.000321
Aug-18	10,430,386.57	11,236,416.37	389,106,706	0.028877	0.023837	0.005040
Sep-18	9,320,122.59	9,451,618.16	338,926,293	0.027887	0.023837	0.004050
Oct-18	7,470,985.58	7,863,031.62	318,493,683	0.024688	0.023837	0.000851

- <sup>(a)</sup> Schedule 2, Line D
- <sup>(b)</sup> Schedule 2, Line K
- <sup>(c)</sup> Schedule 3, Line C
- <sup>(d)</sup> Schedule 1, Line 2
- <sup>(e)</sup> Schedule 1, Line 3
- <sup>(f)</sup> Schedule 1, Line 4

**Duke Energy Kentucky  
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STAFF Second Set Data Requests  
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**STAFF-DR-02-004**

**REQUEST:**

Refer to the Direct Testimony of Brett Phipps, page 6. Explain if Duke Kentucky has ever had to suspend deliveries and terminate coal contracts if quality deficiencies could not be corrected.

**RESPONSE:**

To date, Duke Energy Kentucky has not had to suspend deliveries or terminate coal contracts due to quality deficiencies that could not be corrected.

**PERSON RESPONSIBLE:**        Brett Phipps

**Duke Energy Kentucky  
Case No. 2019-00006  
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**STAFF-DR-02-005**

**REQUEST:**

For the period under review, describe how often the severance tax on Kentucky coal affects Duke Kentucky's decision to purchase coal mined in Kentucky.

**RESPONSE:**

Duke Energy Kentucky's decision to purchase coal is based on the bid price that suppliers provide in their proposals in response to the Company's solicitations. Suppliers do not provide a breakdown of what makes up that bid price. The Company is unaware of the amount of severance tax on Kentucky coal included in the suppliers bid price. As a result, the severance tax on Kentucky coal does not affect the Company's decision to purchase coal mined in Kentucky.

**PERSON RESPONSIBLE:**       Brett Phipps