# KyPSC Case No. 2019-00271 ATTORNEY GENERAL 1<sup>ST</sup> SET TABLE OF CONTENTS

DATA REQUEST	WITNESS	TAB NO.
AG-DR-01-001	Danielle Weatherston	1
AG-DR-01-002	Danielle Weatherston,	2
AG-DR-01-003	Christopher Jacobi	3
AG-DR-01-004	Christopher Jacobi	4
AG-DR-01-005	Melissa B. Abernathy	5
AG-DR-01-006	John Panizza	6
AG-DR-01-007	Retha Hunsicker Sarah E. Lawler,	7
AG-DR-01-008	Lang Reynolds Sarah E. Lawler,	8
AG-DR-01-009	T. K. Christie	9
AG-DR-01-010	Christopher Jacobi Danielle Weatherston Ash Norton Sarah Lawler	10
AG-DR-01-011	Danielle Weatherston	11
AG-DR-01-012	Danielle Weatherston	12
AG-DR-01-013	Jeff Setser	13
AG-DR-01-014	John Panizza	14

AG-DR-01-015	John Panizza	15
AG-DR-01-016	John Panizza	16
AG-DR-01-017	John Panizza	17
AG-DR-01-018	John Panizza	18
AG-DR-01-019	John Panizza	19
AG-DR-01-020	Legal John Panizza Sarah E. Lawler	20
AG-DR-01-021	Legal	21
AG-DR-01-022	Legal William Don Wathen Jr	. 22
AG-DR-01-023	John J. Spanos	23
AG-DR-01-024	Melissa B. Abernathy	24
AG-DR-01-025	Melissa B. Abernathy	25
AG-DR-01-026	John J. Spanos	26
AG-DR-01-027	Melissa B. Abernathy	27
AG-DR-01-028	John J. Spanos	. 28
AG-DR-01-029	John J. Spanos	. 29
AG-DR-01-030	John J. Spanos	.30
AG-DR-01-031	John J. Spanos	.31
AG-DR-01-032	John J. Spanos	.32

AG-DR-01-033	Melissa B. Abernathy Christopher Jacobi
	John Panizza
AG-DR-01-034	Christopher Jacobi John Panizza32
AG-DR-01-035	Christopher Jacobi John Panizza
AG-DR-01-036	Christopher Jacobi John Panizza
AG-DR-01-037	Renee H. Metzler 37
AG-DR-01-038	Renee H. Metzler 38
AG-DR-01-039	Danielle Weatherston Christopher Jacobi39
AG-DR-01-040	Jeff Setser Danielle Weatherston40
AG-DR-01-041	Christopher Jacobi41
AG-DR-01-042	Renee H. Metzler42
AG-DR-01-043	Renee H. Metzler43
AG-DR-01-044	Renee H. Metzler44
AG-DR-01-045	Sarah E. Lawler45
AG-DR-01-046	Christopher M. Jacobi Danielle L. Weatherston
AG-DR-01-047	Christopher M. Jacobi Danielle L. Weatherston

AG-DR-01-048	Christopher M. Jacobi Danielle L. Weatherston
AG-DR-01-049	Jeff Setser49
AG-DR-01-050	Jeff Setser Christopher M. Jacobi
AG-DR-01-051	Jeff Setser51
AG-DR-01-052	Sarah E. Lawler52
AG-DR-01-053	Christopher M. Jacobi Sarah E. Lawler53
AG-DR-01-054	John Verderame
AG-DR-01-055	Christopher M. Jacobi John Verderame
AG-DR-01-056	Sarah E. Lawler56
AG-DR-01-057	John Panizza 57
AG-DR-01-058	John Panizza 58
AG-DR-01-059	John Panizza 59
AG-DR-01-060	Legal John Panizza 60
AG-DR-01-061	Legal John Panizza
AG-DR-01-062	John Panizza 62
AG-DR-01-063	Danielle L. Weatherston 63
AG-DR-01-064	Dr. Roger Morin, Ph.D 64

AG-DR-01-065	Christopher M. Jacobi	65
AG-DR-01-066	Dr. Roger Morin, Ph.D.	. 66
AG-DR-01-067	Dr. Roger Morin, Ph.D.	67
AG-DR-01-068	Christopher M. Jacobi	68
AG-DR-01-069	William Don Wathen Jr.	. 69
AG-DR-01-070	Dr. Roger Morin, Ph.D.	70
AG-DR-01-071	Dr. Roger Morin, Ph.D.	71
AG-DR-01-072	Christopher M. Jacobi	72
AG-DR-01-073	Dr. Roger Morin, Ph.D.	73
AG-DR-01-074	Danielle L. Weatherston	74
AG-DR-01-075	Danielle L. Weatherston	75
AG-DR-01-076	Christopher M. Jacobi	76
AG-DR-01-077	Christopher M. Jacobi	77
AG-DR-01-078	James E. Ziolkowski	78
AG-DR-01-079	James E. Ziolkowski	79
AG-DR-01-080	Christopher M. Jacobi	80
AG-DR-01-081	Christopher M. Jacobi	81
AG-DR-01-082	James E. Ziolkowski	82
AG-DR-01-083	James E. Ziolkowski	83
AG-DR-01-084	Christopher M. Jacobi	84

AG-DR-01-085	Christopher M. Jacobi 85
AG-DR-01-086	Christopher M. Jacobi 86
AG-DR-01-087	Christopher M. Jacobi
AG-DR-01-088	Christopher M. Jacobi
AG-DR-01-089	Christopher M. Jacobi 89
AG-DR-01-090	Christopher M. Jacobi
AG-DR-01-091	Christopher M. Jacobi
AG-DR-01-092	Sarah E. Lawler92
AG-DR-01-093	Christopher M. Jacobi
AG-DR-01-094	Christopher M. Jacobi
AG-DR-01-095	Christopher M. Jacobi James E. Ziolkowski
AG-DR-01-096	Jeff L. Kern96
AG-DR-01-097	John Verderame97
AG-DR-01-098	Sarah E. Lawler Jeff L. Kern
AG-DR-01-099	Legal Tim Abbot99
AG-DR-01-100	Legal William Don Wathen Jr
AG-DR-01-101	Jeff Setser101
AG-DR-01-102	Retha Hunsicker102

AG-DR-01-103	Retha Hunsicker	103
AG-DR-01-104	Melissa B. Abernathy	104
AG-DR-01-105	Jeff L. Kern	105
AG-DR-01-106	Lesley G. Quick Sarah E. Lawler	106
AG-DR-01-107	Sarah E. Lawler James E. Ziolkowski Lesley G. Quick	107
AG-DR-01-108	Zachary Kuznar John Verderame	108
AG-DR-01-109	Zachary Kuznar Sarah E. Lawler	109
AG-DR-01-110	Zachary Kuznar	110
AG-DR-01-111	Zachary Kuznar	111
AG-DR-01-112	Ash M. Norton	112
AG-DR-01-113	Ash M. Norton	113
AG-DR-01-114	Legal Ash M. Norton	114
AG-DR-01-115	John Verderame Andrew Ritch Ash M. Norton	115
AG-DR-01-116	Andrew Ritch	116
AG-DR-01-117	Ash M. Norton	117
AG-DR-01-118	Ash M. Norton	118

AG-DR-01-119	Ash M. Norton 119
AG-DR-01-120	Ash M. Norton
AG-DR-01-121	Ash M. Norton 121
AG-DR-01-122	Ash M. Norton 122
AG-DR-01-123	Legal Ash M. Norton
AG-DR-01-124	Christopher M. Jacobi 124
AG-DR-01-125	Ash M. Norton Melissa Abernathy Christopher M. Jacobi
AG-DR-01-126	Ash M. Norton 126
AG-DR-01-127	Ash M. Norton 127
AG-DR-01-128	Legal 128
AG-DR-01-129	Lang Reynolds 129
AG-DR-01-130	James E. Ziolkowski
AG-DR-01-131	T.K. Christie
AG-DR-01-132	T.K. Christie
AG-DR-01-133	T.K. Christie
AG-DR-01-134	Melissa B. Abernathy
AG-DR-01-135	Legal Retha Hunsicker
AG-DR-01-136	Sarah E. Lawler 136

AG-DR-01-137	John Verderame 137
AG-DR-01-138	John Verderame
AG-DR-01-139	John Verderame
AG-DR-01-140	John Verderame 140
AG-DR-01-141	Legal John Verderame
AG-DR-01-142	John Verderame
AG-DR-01-143	John Verderame
AG-DR-01-144	Legal J. Michael Mosley 144
AG-DR-01-145	John Verderame
AG-DR-01-146	William Don Wathen Jr
AG-DR-01-147	Legal William Don Wathen Jr
AG-DR-01-148	William Don Wathen Jr
AG-DR-01-149	Legal Jeff L. Kern
AG-DR-01-150	Jeff L. Kern
AG-DR-01-151	Zachary Kuznar 151
AG-DR-01-152	Zachary Kuznar 152
AG-DR-01-153	Sarah E. Lawler Christopher M. Jacobi
AG-DR-01-154	Sarah E. Lawler 154

AG-DR-01-155	Sarah E. Lawler 15
AG-DR-01-156	Sarah E. Lawler 15
AG-DR-01-157	Tim Abbott 15

STATE OF OHIO	)	
	)	SS:
COUNTY OF HAMILTON	)	

The undersigned, William Don Wathen Jr., Director of Rates & Regulatory Strategy, being duly sworn, deposes and says that he has personal knowledge of the matters set forth in the foregoing data request and that it is true and correct to the best of his knowledge, information and belief.

William Don Wathen Jr., Affiant

Subscribed and sworn to before me by William Don Wathen Jr., on this 28th day of October, 2019.

THE PARTY OF THE P

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

NOTARY PUBLIC

My Commission Expires: 1/5/2024

# <u>VERIFICATION</u>

STATE OF OHIO	)	
	)	SS:
COUNTY OF HAMILTON	)	

The undersigned, Andrew Ritch, Wholesale Renewable Manager, being duly sworn, deposes and says that he has personal knowledge of the matters set forth in the foregoing data request and that it is true and correct to the best of his knowledge, information and belief.

Subscribed and sworn to before me by Andrew Ritch, on this 25 H day of



Notary Public, State of Ohio My Commission Expires 01-05-2024

Adulu Arisch

NOTARY PUBLIC

My Commission Expires: 1/5/2024

STATE OF OHIO	)	
	)	SS:
COUNTY OF HAMILTON	)	

The undersigned, Zachary Kuznar, Managing Director CHP Microgrid & Engineer Storage Development, being duly sworn, deposes and says that he has personal knowledge of the matters set forth in the foregoing data request and that it is true and correct to the best of his knowledge, information and belief.

Zachary Kuznar, Affiant

Subscribed and sworn to before me by Zachary Kuznar, on this day

CNBFR , 2019

**NOTARY PUBLIC** 

My Commission Expires: July 8,2027

E. MINNA ROLFES-ADKINS Notary Public, State of Ohlo My Commission Expires July 8, 2022

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

The undersigned, Jeffrey R. Setser, Director of Allocations and Reporting, being duly sworn, deposes and says that he has personal knowledge of the matters set forth in the foregoing data request and that it is true and correct to the best of his knowledge, information and belief.

Jeffrey R. Setser Affiant

Subscribed and sworn to before me by Jeffrey R. Setser on this 24 day of October, 2019.

Notary Public Catawba County

NOTÁRY PUBLIC

My Commission Expires: Oct. 24, 2019

STATE OF OHIO	)	
	)	SS:
COUNTY OF HAMILTON	)	

The undersigned, James E. Ziołkowski, Director, Rates & Regulatory Planning, being duly swom, deposes and says that he has personal knowledge of the matters set forth in the foregoing data request and that it is true and correct to the best of his knowledge, information and belief.

James E. Ziotkowski Affiant

Subscribed and sworn to before me by James E. Ziolkowski on this  $23^{\circ\circ}$  day of OCTOBER, 2019.



Notary Public, State of Ohio

Addle M. Frisch
NOTARY PUBLIC

My Commission Expires: 1/5/2024

STATE OF INDIANA	)	
	)	SS:
COUNTY OF HENDRICKS	)	

The undersigned, Thomas Christie, Director Distribution Vegetation Management, being duly sworn, deposes and says that he has personal knowledge of the matters set forth in the foregoing data request and that it is true and correct to the best of his knowledge, information and belief.

Thomas Christie, Affiant

Subscribed and sworn to before me by Thomas Christie on this 22 day of

<u>1000 ber</u>, 2019.

NOTARY PUBLIC

My Commission Expires: 10/7/200

STATE OF NORTH CAROLINA	)	
	)	SS
COUNTY OF MECKLENBURG	)	

The undersigned, Lang W. Reynolds, Director Electrification Strategy, being duly sworn, deposes and says that he has personal knowledge of the matters set forth in the foregoing data request and that it is true and correct to the best of his knowledge, information and belief.

Lang W. Reynolds Affiant

Subscribed and sworn to before me by Lang W. Reynolds on this 22 day of october, 2019.

My Commission Expires: February 1,2023

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

The undersigned, Retha Hunsicker, VP Customer Connect-Solutions, being duly sworn, deposes and says that she has personal knowledge of the matters set forth in the foregoing data request and that it is true and correct to the best of her knowledge, information and belief.

Subscribed and sworn to before me by Retha Hunsicker on this 21 day of October, 2019.

CAROLINA

Carla Sechnest

NOTARY PUBLIC
Carla Sechrest

My Commission Expires: 9/17/2024

STATE OF NORTH CAROLINA	)	
	)	SS
COUNTY OF MECKLENBURG	)	

The undersigned, Danielle L. Weatherston, Manager Accounting II, being duly sworn, deposes and says that she has personal knowledge of the matters set forth in the foregoing data request and that it is true and correct to the best of her knowledge, information and belief.

Danielle L. Weatherston, Affiant

Subscribed and sworn to before me by Danielle L. Weatherston on this 10 day

My Commission Expires: August 18th, 7021

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

The undersigned, Lesley G. Quick, Vice President Revenue Services, being duly sworn, deposes and says that she has personal knowledge of the matters set forth in the foregoing data request and that it is true and correct to the best of her knowledge, information and belief.

Lesley G. Quick Affiant

Subscribed and sworn to before me by Lesley G. Quick on this <u>al</u> day of <u>ther</u>, 2019.

My Commission Expires:

March 18,2022

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

The undersigned, Melissa Brammer Abernathy, Manager Accounting II, Asset Accounting being duly sworn, deposes and says that she has personal knowledge of the matters set forth in the foregoing data request and that it is true and correct to the best of her knowledge, information and belief.

Melassa Brammer Abernathy, Affiant

Subscribed and sworn to before me by Melissa Brammer Abernathy on this 21 day of October , 2019.

NOTARY PUBLIC

My Commission Expires: October 24, 2019

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

The undersigned, John A. Verderame Managing Director, Trading and Dispatch, being duly sworn, deposes and says that he has personal knowledge of the matters set forth in the foregoing data request and that it is true and correct to the best of his knowledge, information and belief.

John A. Verderame Affiant

Subscribed and sworn to before me by John A. Verderame on this 17 day of DC 10862, 2019.

NOTARTTOBLIC

My Commission Expires:

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

STATE OF OHIO	)	
	)	SS:
COUNTY OF HAMILTON	)	

The undersigned, Ash M. Norton, Director Distribution Design Engineering and its subsidiary, Duke Energy Kentucky, Inc., being duly sworn, deposes and says that she has personal knowledge of the matters set forth in the foregoing data request and that it is true and correct to the best of her knowledge, information and belief.

Ash M. Norton, Affiant

Subscribed and sworn to before me by Ash M. Norton, on this 21st day of Grober, 2019.

My Commission Expires: Jay 8,2022

E. MINNA ROLFES-ADKINS Notary Public, State of Ohlo My Commission Expires July 8, 2022

STATE OF OHIO	)	
	)	SS
COUNTY OF HAMILTON	)	

The undersigned, Jeff L. Kern, Lead Rates & Regulatory Strategy Analyst, being duly sworn, deposes and says that he has personal knowledge of the matters set forth in the foregoing data request and that it is true and correct to the best of his knowledge, information and belief.

Jeff L. Kern, Affiant

Subscribed and sworn to before me by Jeff L. Kern, on this  $\frac{21^{ST}}{\text{day}}$  of OCTOBER, 2019.

ADELE M. FRISCH Notary Public, State of Ohio My Commission Expires 01-05-2024 adeli M. Frisch
NOTARY PUBLIC

My Commission Expires: 1/5/2024

STATE OF NORTH CAROLINA	)	
	)	SS
COUNTY OF MECKLENBURG	)	

The undersigned, Christopher M. Jacobi, Director, Regional Financial Forecasting, being duly sworn, deposes and says that he has personal knowledge of the matters set forth in the foregoing data request and that it is true and correct to the best of his knowledge, information and belief.

Christopher M. Jacobi Affiant

Subscribed and sworn to before me by Christopher M. Jacobi on this 17 day of October, 2019.

AND COMMENTAL OF THE PARTY OF T

NOTARY PUBLIC

My Commission Expires:06/00/2020

STATE OF OHIO	)	
	)	SS:
COUNTY OF HAMILTON	)	

The undersigned, Tim Abbott, Director of System Operations Services, 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 her knowledge, information and belief.

Tim Abbott, Affiant

Subscribed and sworn to before me by Tim Abbott, on this 21st day of Cotober, 2019.

NOTARY PUBLIC

My Commission Expires: Diy 8, 2022

E. MINNA ROLFES-ADKINS Notary Public, State of Otio My Commission Expires July 8, 2022

COMMONWEALTH OF PENNSYLVANIA	)	
	)	SS:
COUNTY OF CUMBERLAND	)	

The undersigned, John J. Spanos, President, being duly sworn, deposes and says that he has personal knowledge of the matters set forth in the foregoing data request and that it is true and correct to the best of his knowledge, information and belief.

John J. Spanos Affrant

Subscribed and sworn to before me by John J. Spanos on this 11th day of October, 2019.

My Commission Expires: Ebrusy 20, 2023

Commonwealth of Pennsylvania - Notary Seai Cheryl Ann Rutter, Notary Public Cumberland County My commission expires February 20, 2023 Commission number 1143028

Member, Pennsylvania Association of Notaries

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

The undersigned, John R. Panizza, Director, Tax Operations, being duly sworn, deposes and says that he has personal knowledge of the matters set forth in the foregoing data request and that it is true and correct to the best of his knowledge, information and belief.

ohn R. Panizza Affiant

Subscribed and sworn to before me by John R. Panizza on this 16 day of 0c2., 2019.

AUBLIC TO 10/02/202

NOTARY PUBLIC

My Commission Expires: 10/8/21

STATE OF FLORIDA	)	
	)	SS:
COUNTY OF NASSAU	)	

The undersigned, Dr. Roger A. Morin, Professor of Finance and a Principal in Utility Research International, 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.

Dr. Roger A. Morin Affiant

Subscribed and sworn to before me by Dr. Roger A. Morin on this \( \frac{1}{2} \) day of \( \frac{\text{OCL}}{2} \), 2019.

NOTARY PUBLIC

My Commission Expires:



STATE OF INDIANA	)	
	)	SS:
COUNTY OF HENDRICKS	)	

The undersigned, James Michael Mosley, Vice President Midwest Generation, being duly sworn, deposes and says that he has personal knowledge of the matters set forth in the foregoing data request and that it is true and correct to the best of his knowledge, information and belief.

James Michael Mosley, Affiant

Subscribed and sworn to before me by James Michael Mosley on this day of October, 2019.

NOTARY PUBLIC

My Commission Expires:

Jennifer L Jones

Notzry Public Seal State of Indiana
Hendricks County
Commission Number NP0826633
My Commission Expires 05/22/2027

## <u>VERIFICATION</u>

STATE OF OHIO	)	
	)	SS:
COUNTY OF HAMILTON	)	

The undersigned, Sarah E. Lawler, Director Rates & Regulatory Planning, being duly sworn, deposes and says that she has personal knowledge of the matters set forth in the foregoing data request and that it is true and correct to the best of her knowledge, information and belief.

Sarah E. Lawler Affiant

Subscribed and sworn to before me by Sarah E. Lawler on this law of day of October, 2019.

My Commission Expires: July 8, 2022

E. MINNA ROLFES-ADKINS

Notary Public, State of Ohio My Commission Expires July 8, 2022