

KyPSC Case No. 2019-00271
KROGER 2ND SET
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VERIFICATION

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

The undersigned, Benjamin W. B. Passty, Lead Load Forecasting 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.

Benjamin W. B. Passty
Benjamin W. B. Passty Affiant

Subscribed and sworn to before me by Benjamin W. B. Passty on this 15 day of November, 2019.

PATRICIA C. ROSS
NOTARY PUBLIC
Mecklenburg County
North Carolina

Patricia C. Ross
NOTARY PUBLIC

My Commission Expires: 10-23-2024

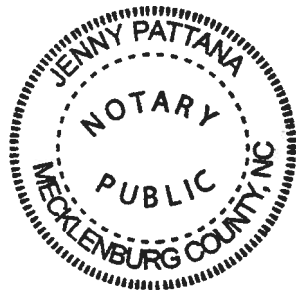
VERIFICATION

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 Jacobi
Christopher M. Jacobi Affiant

Subscribed and sworn to before me by Christopher M. Jacobi on this 14th day of November 2019.



Jenny Pattana
NOTARY PUBLIC

My Commission Expires: 06/08/2020

VERIFICATION

STATE OF OHIO)
)
COUNTY OF HAMILTON) SS:

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 15TH day of NOVEMBER, 2019.



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



NOTARY PUBLIC

My Commission Expires: 11/5/2024

VERIFICATION


STATE OF OHIO)
)
COUNTY OF HAMILTON) SS:

The undersigned, James E. Ziolkowski, Director, Rates & Regulatory Planning, 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 E. Ziolkowski Affiant

Subscribed and sworn to before me by James E. Ziolkowski on this 18th day of November, 2019.



NOTARY PUBLIC

My Commission Expires: July 8, 2022



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

REQUEST:

Load Growth.

- a. Please provide the unadjusted energy and demand loads and revenues for April 2021 through July 2021 by class, preferably in the same format as the loads and revenues provided in Schedule M and N Test Period.
 - i. If the loads and revenues are not available in the same format as the loads and revenues provided in Schedule M and N Test Period, then please provide the information in the format that is available.
- b. Please provide the adjusted energy and demand loads and revenues for April 2021 through July 2021 by class, preferably in the same format as the loads and revenues provided in Schedule M and N for the Test Period.
 - i. If the loads and revenues are not available in the same format as the loads and revenues provided in Schedule M and N Test Period, then please provide the information in the format that is available.
- c. If the actual Duke Energy Kentucky loads turn out to be greater than the adjusted test period loads, please identify the non-fuel variable O&M costs on a per kWh basis that would be incurred to serve the incremental load growth.

- d. If Duke Energy Kentucky were to include an adjustment for expected incremental load growth through the end of July 2021, please explain in detail how that would impact the billing determinants used for rate design.
- e. If Duke Energy Kentucky were to include an adjustment to the test period for expected incremental load growth through the end of July 2021, please explain in detail how that would impact the each of the Company's proposed class cost of service studies.

RESPONSE:

- a. Please see Attachment BWP-8, attached hereto as KROGER-DR-02-001(a) Attachment, for monthly sales numbers (energy), peak loads (demand) and retail revenues in the period indicated, columns E-I. Please note that we do not produce peak forecasts for each individual customer class.
- b. The only adjustments that are commonly made to the forecast are for the impacts of UEE programs, which—for this forecast—are quite small and apply only to residential sales. These forecasts can be viewed in the same attachment, columns M-Q.
- c. Please see KROGER-DR-02-001(c) Attachment.
- d. This question cannot be answered in detail without knowing the details about the adjustment for expected incremental load growth. Generally, if the load for the 12 months ended July 2021 is higher than the load for the Test Period (12 months ended March 2021), then the billing determinants used for rate design would be greater.

e. This question cannot be answered without knowing the details about the adjustment for expected incremental load growth. Most of the allocators that are used in the cost of service model are based on actual costs and billing determinants for the twelve months ended December 31, 2018. Therefore, the adjustment would not change those allocators. Adjustments to plant costs and O&M expenses (inputs to the cost of service model) would flow through the model and change the outputs from what was filed. The relative class percentage increases might change depending on the nature and magnitude of the plant and expense adjustments.

PERSON RESPONSIBLE: Benjamin Passty (energy forecast) – a., b.
Christopher M. Jacobi (revenue forecast) – a. b.
Jeff Kern – d.
James E. Ziolkowski – c. e.

No.	Description	MW Demand - Peak						MWH Sales @ meter, inclusive of UJE						MWH Sales @ meter, before reducing load for UJE projections					
		Residential	Commercial	Industrial	OPA	SL/Other	Residential	Commercial	Industrial	OPA	SL/Other	Residential	Commercial	Industrial	OPA	SL/Other			
1	Apr-21	83,530	108,905	70,355	21,715	1,247	83,622	108,905	70,355	21,715	1,247	83,622	108,905	70,355	21,715	1,247			
2	May-21	98,194	117,989	73,953	27,075	1,242	98,292	117,989	73,953	27,075	1,242	98,292	117,989	73,953	27,075	1,242			
3	Jun-21	138,544	137,447	77,490	24,340	1,264	138,681	137,447	77,490	24,340	1,264	138,681	137,447	77,490	24,340	1,264			
4	Jul-21	165,458	142,598	78,341	24,238	1,283	165,621	142,598	78,341	24,238	1,283	165,621	142,598	78,341	24,238	1,283			
5	Apr-21	9,262,711	9,818,027	4,946,858	1,800,689	152,144	9,262,711	9,818,027	4,946,858	1,800,689	152,144	9,262,711	9,818,027	4,946,858	1,800,689	152,144			
6	May-21	9,692,561	10,552,975	5,578,991	1,928,776	156,831	9,692,561	10,552,975	5,578,991	1,928,776	156,831	9,692,561	10,552,975	5,578,991	1,928,776	156,831			
7	Jun-21	12,029,907	11,788,049	5,745,434	2,113,126	151,379	12,029,907	11,788,049	5,745,434	2,113,126	151,379	12,029,907	11,788,049	5,745,434	2,113,126	151,379			
8	Jul-21	14,720,009	11,897,341	5,572,820	2,030,495	153,004	14,720,009	11,897,341	5,572,820	2,030,495	153,004	14,720,009	11,897,341	5,572,820	2,030,495	153,004			
9	<u>Retail Revenues, inclusive of UJE*</u>																		
10	Apr-21	9,262,711	9,818,027	4,946,858	1,800,689	152,144	9,262,711	9,818,027	4,946,858	1,800,689	152,144	9,262,711	9,818,027	4,946,858	1,800,689	152,144			
11	May-21	9,692,561	10,552,975	5,578,991	1,928,776	156,831	9,692,561	10,552,975	5,578,991	1,928,776	156,831	9,692,561	10,552,975	5,578,991	1,928,776	156,831			
12	Jun-21	12,029,907	11,788,049	5,745,434	2,113,126	151,379	12,029,907	11,788,049	5,745,434	2,113,126	151,379	12,029,907	11,788,049	5,745,434	2,113,126	151,379			
13	Jul-21	14,720,009	11,897,341	5,572,820	2,030,495	153,004	14,720,009	11,897,341	5,572,820	2,030,495	153,004	14,720,009	11,897,341	5,572,820	2,030,495	153,004			

*Please note that the company only calculates forecasted revenues for load inclusive of UJE

DUKE ENERGY KENTUCKY, INC.
 PRODUCTION ENERGY ALLOCATED - ELECTRIC COST OF SERVICE
 CASE NO: 2019-00271

PRODUCTION O&M
 SOURCE: FR-16/7/10-4 PROD ENERGY

LINE NO.	O&M EXPENSES	ALLO	TOTAL PRODUCTION ENERGY	Schedule 6												
				3	4	5	6	7	8	9	10	11	12	13		
				RIS RESIDENTIAL	DS SECONDARY DISTRIBUTION	GSFL SECONDARY DISTRIBUTION	EH SECONDARY DISTRIBUTION	SP SECONDARY DISTRIBUTION	DT SEC SECONDARY DISTRIBUTION	DT PRI PRIMARY DISTRIBUTION	DP PRIMARY DISTRIBUTION	TT TRANSMISSION TIME OF DAY	LT LIGHTING	OTHER WATER PUMPING		
1	PRODUCTION O&M															
2	ENERGY RELATED PRODUCTION O&M															
3	FUEL	K302	0	0	0	0	0	0	0	0	0	0	0	0		
4	FUEL AND PURCHASED POWER ADJUSTMENT	K302	100,379,665	38,048,920	27,126,608	15,1573	430,629	7,027	16,576,701	11,552,698	542,050	5,492,776	438,663	11,042		
5	EMISSION ALLOWANCES	K301	0	0	0	0	0	0	0	0	0	0	0	0		
6	ELIMINATE EMISSION ALLOW & OTHER VAR COST	K301	0	0	0	0	0	0	0	0	0	0	0	0		
7	OTHER PRODUCTION EXPENSE - MAINTENANCE	K301	40,683,654	15,356,451	10,956,922	61,432	174,126	2,848	6,713,210	4,662,754	218,471	2,355,584	177,381	4,475		
8	MISO TRANSMISSION CHARGES - ACCT 555	K301	0	0	0	0	0	0	0	0	0	0	0	0		
9	TOTAL ENERGY RELATED		141,063,339	53,405,371	38,083,528	213,005	604,755	9,875	23,289,911	16,215,452	760,521	7,848,360	617,044	15,517		
10	TOTAL ENERGY RELATED EXCL FUEL AND PP		40,683,654	15,356,451	10,956,922	61,432	174,126	2,848	6,713,210	4,662,754	218,471	2,355,584	177,381	4,475		
11	KWH SALES		4,261,970,981	1,608,724,299	1,147,823,576	6,420,710	18,228,802	298,034	703,280,622	488,455,966	22,905,588	232,255,694	18,599,129	479,245		
12	PRODUCTION NON-FUEL VARIABLE O&M PER KWH	10 / 11	\$ 0.009546	\$ 0.009546	\$ 0.009546	\$ 0.009552	\$ 0.009552	\$ 0.009556	\$ 0.009546	\$ 0.009546	\$ 0.009538	\$ 0.010142	\$ 0.009537	\$ 0.009338		

**Duke Energy Kentucky
Case No. 2019-00271
Kroger's Second Set Data Requests
Date Received: November 12, 2019**

KROGER-DR-02-002

REQUEST:

Depreciation. Refer to Duke Energy Kentucky's response to Kroger's First Set of Data Requests, 1-003 e. Please identify the amount of depreciation expense associated with certain capital projects being executed to support the Amazon Air Hub that has been included in the test period.

RESPONSE:

The amount of depreciation expense included in the test period is \$156,708.

PERSON RESPONSIBLE: Christopher M. Jacobi