

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 21ST day of OCTOBER, 2019.



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



NOTARY PUBLIC

My Commission Expires: 1/5/2024

VERIFICATION

STATE OF OHIO)
) SS:
COUNTY OF HAMILTON)

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 23RD day of OCTOBER, 2019.



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



NOTARY PUBLIC

My Commission Expires: 1/5/2024

VERIFICATION

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 25 day of October, 2019.



NOTARY PUBLIC

My Commission Expires: July 8, 2022



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

KyPSC Case No. 2019-00271
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**Duke Energy Kentucky
Case No. 2019-00271
Northern Kentucky University's First Set Data Requests
Date Received: October 14, 2019**

NKU-DR-01-001

REQUEST:

To the extent not already provided, please provide all Section M schedules in Excel format with all formulas intact.

RESPONSE:

Please see STAFF-DR-01-054 Attachment – SCH-M and N – Base Period and STAFF-DR-01-054 Attachment – SCH-M and N – Test Period.

PERSON RESPONSIBLE: Jeff L. Kern

**Duke Energy Kentucky
Case No. 2019-00271
Northern Kentucky University's First Set Data Requests
Date Received: October 14, 2019**

NKU-DR-01-002

REQUEST:

To the extent not already provided, please provide all Section N schedules in Excel format with all formulas intact.

RESPONSE:

Please see STAFF-DR-01-054 Attachment – SCH-M and N – Base Period and STAFF-DR-01-054 Attachment – SCH-M and N – Test Period.

PERSON RESPONSIBLE: Jeff L. Kern

**Duke Energy Kentucky
Case No. 2019-00271
Northern Kentucky University's First Set Data Requests
Date Received: October 14, 2019**

NKU-DR-01-003

REQUEST:

To the extent not already provided, please provide Schedules FR 16(7)(v)-1 through FR 16(7)(v)-25 in Excel format with all formulas intact.

RESPONSE:

The Company provided the Cost of Service Studies and work papers to Staff in its response to STAFF-DR-01-055.

PERSON RESPONSIBLE: James E. Ziolkowski

**Duke Energy Kentucky
Case No. 2019-00271
Northern Kentucky University's First Set Data Requests
Date Received: October 14, 2019**

NKU-DR-01-004

REQUEST:

To the extent not already provided, please provide Work Paper FR 16(7)(v) that supports the cost of service study in Excel format with all formulas intact.

RESPONSE:

The Company provided the Cost of Service Studies and work papers to Staff in its response to STAFF-DR-01-055.

PERSON RESPONSIBLE: James E. Ziolkowski

**Duke Energy Kentucky
Case No. 2019-00271
Northern Kentucky University's First Set Data Requests
Date Received: October 14, 2019**

NKU-DR-01-005

REQUEST:

To the extent not already provided, please provide in Excel format with all formulas intact all workpapers supporting the direct testimony and attachments of Mr. Kern.

RESPONSE:

See NKU-DR-01-005 Attachment for the Excel spreadsheet used to calculate the increase in the reconnection charge and the pole attachment charge for the Test Period and Base Period.

PERSON RESPONSIBLE: Jeff L. Kern

**Duke Energy Kentucky
 Reconnection Charges
 December 2018 - May 2019**

	Number	Current		Current	
		Charge	Total	Charge	Total
Remote Reconnections	2,577	\$3.45	\$8,890.65	\$5.88	\$15,152.76
Non-Remote Reconnections	51	\$75.00	\$3,825.00	\$60.00	\$3,060.00
Reconnections at the Pole	27	\$125.00	\$3,375.00	\$125.00	\$3,375.00
Additional After Hours Charge	32	\$25.00	\$800.00	\$40.00	\$1,280.00
			<u>\$16,890.65</u>		<u>\$22,867.76</u>
Increase					\$5,977.11
% Increase					35.39%
		Base	Test		
		Period	Period		
Current		\$38,885	\$45,600		
Increase		\$13,761	\$16,138		
Proposed		<u>\$52,646</u>	<u>\$61,738</u>		

DUKE ENERGY KENTUCKY, INC.
 ELECTRIC DEPARTMENT
 CASE NO. 2019-00271
 ADJUST REVENUE
 FOR THE TWELVE MONTHS ENDED MARCH 31, 2021

Line No.	Description	Pole Attachment Rate		
		Current	Proposed	% Increase
1	2-User Pole	\$ 5.92	\$ 8.76	47.97%
2	3-User Pole	\$ 4.95	\$ 7.40	49.49%
3				
4	Average			48.73%
5				
6				
7	Current Pole Attachment Revenue			\$ 215,037
8				
9	Proposed Pole Attachment Revenue			319,833
10				
11	Adjustment			\$ 104,796

DUKE ENERGY KENTUCKY, INC.
 ELECTRIC DEPARTMENT
 CASE NO. 2019-00271
 ADJUST REVENUE
 FOR THE TWELVE MONTHS ENDED NOVEMBER 30, 2020

Line No.	Description	Pole Attachment Rate		
		Current	Proposed	% Increase
1	2-User Pole	\$ 5.92	\$ 8.76	47.97%
2	3-User Pole	\$ 4.95	\$ 7.40	49.49%
3				
4	Average			48.73%
5				
6				
7	Current Pole Attachment Revenue			\$ 472,682
8				
9	Proposed Pole Attachment Revenue			703,039
10				
11	Adjustment			\$ 230,357

**Duke Energy Kentucky
Case No. 2019-00271
Northern Kentucky University's First Set Data Requests
Date Received: October 14, 2019**

NKU-DR-01-006

REQUEST:

To the extent not already provided, please provide in Excel format with all formulas intact all attachments to Mr. Kern's direct testimony.

RESPONSE:

Please see STAFF-DR-01-054 Attachment – JLK2, STAFF-DR-01-054 Attachment – JLK3, STAFF-DR-01-054 Attachment – JLK4 and STAFF-DR-01-054 Attachment – JLK5.

PERSON RESPONSIBLE: Jeff L. Kern

**Duke Energy Kentucky
Case No. 2019-00271
Northern Kentucky University's First Set Data Requests
Date Received: October 14, 2019**

NKU-DR-01-007

REQUEST:

Reference Kern testimony at page 9, lines 11 - 13. (Application, Volume 14, page 338 of 413.) The witness states: "Due to the anticipated future replacement of the Company's billing system, we have chosen to not seek implementation of any significant rate design in this case." Provide the witness' definition of significant.

RESPONSE:

Please see the response to STAFF-DR-02-063(a).

PERSON RESPONSIBLE: Jeff L. Kern

Duke Energy Kentucky
Case No. 2019-00271
Northern Kentucky University's First Set Data Requests
Date Received: October 14, 2019

NKU-DR-01-008

REQUEST:

Reference Kern testimony at page 14, lines 4 – 8. (Application, Volume 14, page 343 of 413.) The witness states: “Duke Energy Kentucky is proposing Electric Vehicle/Transportation Pilot Programs, as explained in detail by Company witness Lang Reynolds. In order to include the net revenues from these pilot programs in Rider PSM as described by Company witness Sarah E. Lawler the formula in Rider PSM will be revised to include Net Revenues from EV Charging Stations.” Confirm the Net Revenues could be a charge and not necessarily a credit.

RESPONSE:

The Net Revenues associated with the Electric Vehicle/Transportation Pilot Programs included in Rider PSM will always be a credit to customers. As Company witness Mr. Lang Reynolds notes in response to STAFF-DR-02-125, the Company does not expect costs to exceed revenues, based on existing utilization rates. However, if this were to happen the Company would seek recovery of these costs in a subsequent rate case.

PERSON RESPONSIBLE: Jeff L. Kern

**Duke Energy Kentucky
Case No. 2019-00271
Northern Kentucky University's First Set Data Requests
Date Received: October 14, 2019**

NKU-DR-01-009

REQUEST:

To the extent not already provided, please provide in Excel format with all formulas intact all workpapers supporting the direct testimony and attachments of Mr. Ziolkowski.

RESPONSE:

Please see STAFF-DR-01-055 and NKU-DR-01-010.

PERSON RESPONSIBLE: James E. Ziolkowski

**Duke Energy Kentucky
Case No. 2019-00271
Northern Kentucky University's First Set Data Requests
Date Received: October 14, 2019**

NKU-DR-01-010

REQUEST:

To the extent not already provided, please provide in Excel format with all formulas intact all attachments to Mr. Ziolkowski's direct testimony.

RESPONSE:

Please see NKU-DR-01-010 Attachment.

PERSON RESPONSIBLE: James E. Ziolkowski

DUKE ENERGY KENTUCKY, INC.
 ELECTRIC COST OF SERVICE STUDY
 CASE NO: 2019-00271
 ALLOCATION FACTORS FOR COST OF SERVICE STUDY

Attachment JEZ-1
 Witness Responibl
 James E. Ziolkowsk
 Page 1 of 1

LINE NO.	RATE GROUP	12 CP DEMAND RATIO %	AVG & EXCESS RATIO %	DIFFERENCE %	PROD STACKING RATIO %	DIFFERENCE %
		A	B	C = B - A	D	E = D - A
1						
2	Retail:					
3	Residential	45.078%	51.035%	5.957%	40.216%	-4.862%
4	Dist Secondary - DS	27.064%	23.429%	-3.635%	26.955%	-0.109%
5	Dist Secondary - GS-FL	0.130%	0.105%	-0.025%	0.144%	0.014%
6	Dist Secondary - EH	0.513%	0.596%	0.083%	0.455%	-0.058%
7	Dist Secondary - SP	0.007%	0.007%	0.000%	0.007%	0.000%
8	Dist Secondary - DT	13.494%	11.968%	-1.527%	15.515%	2.021%
9	Dist Primary - DT	8.921%	7.847%	-1.074%	10.641%	1.720%
10	Dist Primary - DP	0.431%	0.438%	0.007%	0.503%	0.072%
11	Transmission	4.227%	4.091%	-0.137%	5.206%	0.979%
12	Lighting	0.124%	0.456%	0.332%	0.336%	0.212%
13	Other	0.011%	0.029%	0.018%	0.022%	0.011%
14	Total Retail	100.000%	100.000%	0.000%	100.000%	0.000%

K201 Generation Allocator Using 12 CP

Line No.	Rate Class	Jurisdictional Electric Rate Base (A)	Present Revenues (B)	Net Operating Income (C)	Present ROR (D)	Present Revenues At Average ROR (E)	Inter Class Subsidization Overcollected (Undercollected) (F)	Inter Class Subsidization times 5.00% (G)	Rate Increase (Allocated to class based on Rate Base) (H)	Proposed Revenues 95.00% Interclass Subsidization (I)	Proposed Percent Increase (J)	ROR At Proposed Rates (K)	Proposed Increase Less (Subsidy) Excess (L)
		FR-16(7)(v)-14, page1	FR-16(7)(v)-14, page1	Work Paper FR-16(7)(v), Page 2	(C) / (A)	(C)/(1-CompositeTaxRate)	(B) - (E)	(F) * 5.00%	(H) Line 5 * ((A) / (A) Line 5)	(B) - (G) + (H)	((H) - (G)) / (B)	((((H) - (G)) * (1-CompositeTaxRate) + (C)) / (A)	(H) - (G)
1	Rate RS	\$ 468,126,678	\$ 123,883,637	\$ 1,538,370	0.3286%	\$ 141,106,988	\$ (17,225,351)	\$ (861,268)	\$ 22,572,034	\$ 147,196,005	18.818%	4.086674%	\$ 23,433,302
2	Rate DS	242,489,761	90,318,223	16,285,957	6.7159%	78,609,822	11,706,401	585,420	11,692,734	101,425,537	12.298%	10.154550%	11,107,314
3	Rate GS-FL	1,195,789	577,046	157,588	13.1786%	416,373	160,673	8,034	57,636	626,648	8.596%	16.292748%	49,602
4	Rate EH	4,690,299	600,937	(430,713)	-9.1831%	1,367,764	(766,827)	(38,341)	226,164	865,442	44.016%	-4.949277%	264,505
5	Rate SP	71,824	29,960	7,474	10.4060%	22,962	6,998	350	3,468	33,078	10.408%	13.665347%	3,118
6	Rate DT - Secondary	117,799,323	46,910,116	6,718,600	5.7034%	42,811,121	4,098,995	204,950	5,679,984	52,385,150	11.671%	9.192731%	5,475,034
7	Rate DT-Primary	77,794,031	29,943,872	3,000,244	3.8567%	29,150,584	793,288	39,664	3,751,061	33,655,269	12.395%	7.438323%	3,711,397
8	Rate DP	3,811,936	1,361,377	90,448	2.3728%	1,397,850	(36,473)	(1,824)	183,616	1,547,017	13.636%	6.028871%	185,640
9	Rate TT	25,639,048	14,062,168	1,780,987	6.9464%	12,745,535	1,316,633	65,832	1,236,237	15,232,573	8.323%	10.373503%	1,170,405
10	Lighting	4,693,957	1,876,470	116,115	2.4737%	1,915,071	(38,601)	(1,930)	226,347	2,104,747	12.165%	6.124760%	228,277
11	Other - Water Pumping	103,180	16,848	(10,126)	-9.8139%	34,584	(17,736)	(867)	4,974	22,709	34.788%	-5.549277%	5,861
12													
13	Total	\$ 946,427,826	\$ 309,580,654	\$ 29,254,944	3.0911%	\$ 309,580,654	\$ -	\$ -	\$ 45,634,456	\$ 355,094,176	14.702%	6.711020%	\$ 45,634,456

K201 Generation Allocator Using Average and Excess Method

1	Rate RS	\$ 499,122,193	\$ 123,883,637	\$ 262,381	0.0526%	\$ 144,084,707	\$ (20,201,070)	\$ (1,010,053)	\$ 24,066,462	\$ 148,839,218	20.144%	3.824425%	\$ 25,076,515
2	Rate DS	223,587,870	90,318,223	17,064,637	7.6322%	78,793,950	13,524,273	676,214	10,780,665	100,422,874	11.188%	11.025058%	10,104,651
3	Rate GS-FL	1,070,320	577,046	162,951	15.2245%	404,063	172,983	8,649	51,608	620,005	7.445%	18.237779%	42,959
4	Rate EH	5,118,985	600,937	(448,520)	-8.7619%	1,409,133	(608,186)	(40,410)	246,825	888,172	47.798%	-4.549312%	287,235
5	Rate SP	71,824	29,960	7,473	10.4046%	22,963	6,997	350	3,463	33,073	10.391%	13.658689%	3,113
6	Rate DT - Secondary	109,858,177	46,910,116	7,045,493	6.4133%	42,048,734	4,861,382	243,069	5,297,095	51,964,142	10.774%	9.887083%	5,054,026
7	Rate DT-Primary	72,205,430	29,943,872	3,230,328	4.4738%	28,614,010	1,329,862	66,493	3,481,571	33,358,950	11.405%	8.024596%	3,415,078
8	Rate DP	3,846,532	1,361,377	88,975	2.3119%	1,401,319	(39,942)	(1,997)	185,567	1,548,941	13.778%	5.970806%	187,564
9	Rate TT	24,928,057	14,062,168	1,810,192	7.2617%	12,677,360	1,384,808	69,240	1,201,970	15,194,898	8.055%	10.673067%	1,132,730
10	Lighting	6,424,384	1,876,470	45,011	0.7006%	2,081,029	(204,559)	(10,228)	309,768	2,196,466	17.053%	4.440090%	319,996
11	Other - Water Pumping	192,054	16,848	(13,987)	-7.2828%	43,386	(26,538)	(1,327)	9,260	27,435	62.841%	-3.144188%	10,587
12													
13	Total	\$ 946,427,826	\$ 309,580,654	\$ 29,254,944	3.0911%	\$ 309,580,654	\$ -	\$ -	\$ 45,634,456	\$ 355,094,176	14.702%	6.711020%	\$ 45,634,456

K201 Generation Allocator Using Production Stacking Method

1	Rate RS	\$ 442,841,437	\$ 123,883,637	\$ 2,579,985	0.5826%	\$ 138,680,391	\$ (14,796,754)	\$ (739,836)	\$ 21,352,741	\$ 145,855,282	17.736%	4.327952%	\$ 22,092,579
2	Rate DS	241,929,922	90,318,223	18,309,315	6.7413%	78,555,246	11,762,877	588,149	11,665,274	101,395,348	12.265%	10.178755%	11,077,125
3	Rate GS-FL	1,266,979	577,046	154,581	12.1815%	423,392	153,654	7,683	61,187	630,550	9.272%	15.346916%	53,504
4	Rate EH	4,367,082	600,937	(418,293)	-9.5347%	1,338,736	(737,799)	(36,890)	211,534	849,381	41.340%	-5.283435%	248,424
5	Rate SP	71,824	29,960	7,473	10.4046%	22,963	6,997	350	3,463	33,073	10.391%	13.658689%	3,113
6	Rate DT - Secondary	128,312,584	46,910,116	6,285,530	4.8966%	43,820,839	3,089,277	154,464	6,186,922	52,942,574	12.860%	8.428161%	6,032,458
7	Rate DT-Primary	86,744,157	29,943,872	2,831,796	3.0340%	30,009,868	(65,994)	(3,300)	4,182,593	34,129,765	13.979%	6.656760%	4,185,893
8	Rate DP	4,183,116	1,361,377	75,006	1.7931%	1,433,702	(72,325)	(3,616)	201,700	1,566,693	15.082%	5.477891%	205,316
9	Rate TT	30,731,000	14,062,168	1,571,378	5.1133%	13,234,388	827,780	41,388	1,481,774	15,502,553	10.243%	8.632149%	1,440,385
10	Lighting	5,797,039	1,876,470	70,683	1.2193%	2,021,004	(144,534)	(7,227)	279,519	2,163,216	15.281%	4.932818%	286,746
11	Other - Water Pumping	160,686	16,848	(12,510)	-7.7854%	40,127	(23,279)	(1,164)	7,748	25,760	52.896%	-3.621802%	8,912
12													
13	Total	\$ 946,427,826	\$ 309,580,654	\$ 29,254,944	3.0911%	\$ 309,580,654	\$ -	\$ -	\$ 45,634,456	\$ 355,094,176	14.702%	6.711020%	\$ 45,634,456

**DUKE ENERGY KENTUCKY
 COST OF SERVICE STUDY
 CALCULATION OF AVERAGE & EXCESS ALLOCATOR
 CASE NO. 2019-00271**

**Attachment JEZ-3
 Witness Responsible:
 James E. Ziolkowski
 Page 1 of 1**

Line No.	Rate Group	Annual Usage (a) (kWh)	System Hour CP (b) (kW)	Class Maximum NCP Demand (c) (kW)	Average Hourly Demand (kW) (Col. 1 / 8,760 hrs)	Excess Demand (Hourly kW) (Col.3 - Col.4)	Excess Demand Ratio (%) (6)	Allocated Excess Demand (kW) (7)	Average & Excess Hourly Demand (kW) (Col.4 + Col. 7) (8)	Average & Excess Hourly Demand (Ratio) K201 (9)
		(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
1										
2										
3	Residential	1,573,474,084		899,439	179,620	719,819	69.2120%	238,358	417,978	51.0351%
4	Dist Secondary - DS	1,117,233,456		321,857	127,538	194,319	18.6842%	64,346	191,884	23.4291%
5	Dist Secondary - GS-FL	6,253,450		1,158	714	444	0.0427%	147	861	0.1051%
6	Dist Secondary - EH	17,753,941		10,653	2,027	8,626	0.8294%	2,856	4,883	0.5962%
7	Dist Secondary - SP	290,270		109	33	76	0.0073%	25	58	0.0071%
9	Dist Secondary - DT	684,960,142		138,051	78,192	59,859	5.7556%	19,822	98,014	11.9675%
10	Dist Primary - DT	475,731,674		84,382	54,307	30,075	2.8918%	9,959	64,266	7.8469%
8	Dist Primary - DP	22,308,907		5,687	2,547	3,140	0.3019%	1,040	3,587	0.4380%
11	Transmission	240,327,025		45,755	27,435	18,320	1.7615%	6,066	33,501	4.0905%
12	Lighting	18,114,621		7,098	2,068	5,030	0.4836%	1,665	3,733	0.4558%
13	Other	1,156,042		444	132	312	0.0300%	103	235	0.0287%
14	Total	4,157,603,612	819,000	1,514,633	474,613	1,040,020	100.0000%	344,387	819,000	100.0000%

**DUKE ENERGY KENTUCKY
 COST OF SERVICE STUDY
 CALCULATION OF PRODUCTION STACKING (TOD) ALLOCATOR
 CASE NO. 2019-00271**

**Attachment JEZ-4
 Witness Responsible:
 James E. Ziolkowski
 Page 1 of 1**

Line No.	Rate Group	Annual Usage (a) (kWh) (1)	Baseload	12CP Demand (kW) (3)	Peak	Total Revenue Requirement (5)	Allocator K201 (6)
			East Bend Net Plant (Allocated on kWh) (2)		Woodsdale Net Plant (Allocated on 12CP) (4)		
1							
2							
3	Residential	1,573,474,084	\$131,774,101	323,558	\$74,584,940	\$206,359,041	40.2163%
4	Dist Secondary - DS	1,117,233,456	\$93,565,211	194,112	\$44,745,708	\$138,310,919	26.9547%
5	Dist Secondary - GS-FL	6,253,450	\$523,709	933	\$215,070	\$738,780	0.1440%
6	Dist Secondary - EH	17,753,941	\$1,486,843	3,682	\$848,756	\$2,335,599	0.4552%
7	Dist Secondary - SP	290,270	\$24,309	51	\$11,756	\$36,066	0.0070%
9	Dist Secondary - DT	684,960,142	\$57,363,517	96,516	\$22,248,376	\$79,611,893	15.5152%
10	Dist Primary - DT	475,731,674	\$39,841,212	64,029	\$14,759,639	\$54,600,850	10.6409%
8	Dist Primary - DP	22,308,907	\$1,868,309	3,090	\$712,291	\$2,580,600	0.5029%
11	Transmission	240,327,025	\$20,126,723	28,569	\$6,585,580	\$26,712,304	5.2058%
12	Lighting	18,114,621	\$1,517,049	891	\$205,389	\$1,722,438	0.3357%
13	Other	1,156,042	\$96,815	79	\$18,211	\$115,026	0.0224%
14	Total	4,157,603,612	\$348,187,800	715,510	\$164,935,716	\$513,123,516	100.0000%

**Duke Energy Kentucky
Case No. 2019-00271
Northern Kentucky University's First Set Data Requests
Date Received: October 14, 2019**

NKU-DR-01-011

REQUEST:

To the extent not already provided, please provide for each class cost of service study referenced by Mr. Ziolkowski (12 CP, Average & Excess, and Production Stacking) in his direct testimony, an electronic version of the class cost of service study in Excel format with all formulas intact.

RESPONSE:

Please see STAFF-DR-01-055.

PERSON RESPONSIBLE: James E. Ziolkowski

Duke Energy Kentucky
Case No. 2019-00271
Northern Kentucky University's First Set Data Requests
Date Received: October 14, 2019

NKU-DR-01-012

REQUEST:

Please identify and provide a detailed description of all changes in cost of service allocation methodology proposed in this proceeding as compared to the cost of service allocation methodology used by Duke Energy Kentucky in its last rate case proceeding, Case No. 2017-00321.

RESPONSE:

The Company used the same cost of service allocation methodology in the current case as compared to the methodology used in the 2017-00321 case.

The Company provided three cost of service studies in both cases. The three studies are identical except for the allocation of production demand. The Company used the production stacking method as its time-differentiated allocator in the 2019 case. In the 2017 case, the Company used a summer/winter method as its time-differentiated allocator for production demand.

PERSON RESPONSIBLE: James E. Ziolkowski

Duke Energy Kentucky
Case No. 2019-00271
Northern Kentucky University's First Set Data Requests
Date Received: October 14, 2019

NKU-DR-01-013

REQUEST:

Reference Kuznar testimony at page 5, lines 10 - 15. (Application, Volume 14, page 378 of 413.) The witness states: "As costs continue to decline for battery storage projects, Duke Energy Kentucky anticipates energy storage could be deployed as a routine solution in the future for Transmission and Distribution upgrades. Now is the time to gain the operational knowledge necessary to own and operate storage assts. The lessons learned from this project will enable the successful implementation of future projects."

- a. Does the witness believe it is fair, just and reasonable for ratepayers to pay for a project with anticipatory solutions for Transmission and Distribution upgrades?
- b. Does the witness believe it is fair, just and reasonable for ratepayers to pay for a project so that DEK can learn lessons for the successful implementation of future projects?

RESPONSE:

- a. The proposed project will provide value to current ratepayers, primarily through its provision of ancillary services in the PJM market. Therefore, it is just and reasonable for current ratepayers to pay for this project. The additional lessons learned from this project will benefit current and future ratepayers and only serves to increase the value of this project for current and future ratepayers.

- b. The proposed project will provide value to current ratepayers, primarily through its provision of ancillary services in the PJM market. Therefore, it is just and reasonable for current ratepayers to pay for this project. The additional lessons learned from this project will benefit current and future ratepayers and only serves to increase the value of this project for current and future ratepayers.

PERSON RESPONSIBLE: Zachary Kuznar