

**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 NEW)	
TARIFFS; 3) APPROVAL OF ACCOUNTING TO)	CASE NO. 2019-00271
ESTABLISH REGULATORY ASSETS AND)	
LIABILITIES; AND 4) ALL OTHER REQUIRED)	
APPROVALS AND RELIEF)	

**NORTHERN KENTUCKY UNIVERSITY’S INITIAL REQUESTS FOR
INFORMATION TO DEK**

Comes now the intervenor, Northern Kentucky University (“Northern Kentucky University” or “NKU”), by and through counsel, and submits these Initial Requests for Information to Duke Energy of Kentucky, Inc. (“DEK” or “the Company”) to be answered by the date specified in the Commission’s Order of Procedure, and in accord with the following:

- (1) In each case where a request seeks data provided in response to a staff request, reference to the appropriate request item will be deemed a satisfactory response.
- (2) Please identify the witness who will be prepared to answer questions concerning each request.
- (3) Please repeat the question to which each response is intended to refer. NKU can provide counsel for DEK with an electronic version of these questions, upon request.
- (4) These requests shall be deemed continuing so as to require further and supplemental responses if the company receives or generates additional information

within the scope of these requests between the time of the response and the time of any hearing conducted hereon.

(5) Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association, be accompanied by a signed certification of the preparer or person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

(6) If you believe any request appears confusing, please request clarification directly from counsel for NKU.

(7) To the extent that the specific document, workpaper or information as requested does not exist, but a similar document, workpaper or information does exist, provide the similar document, workpaper, or information.

(8) To the extent that any request may be answered by way of a computer printout, please identify each variable contained in the printout which would not be self evident to a person not familiar with the printout.

(9) If the company has objections to any request on the grounds that the requested information is proprietary in nature, or for any other reason, please notify counsel for NKU as soon as possible.

(10) As used herein, the words "document" or "documents" are to be construed broadly and shall mean the original of the same (and all non-identical copies or drafts thereof) and if the original is not available, the best copy available. These terms shall include all information recorded in any written, graphic or other tangible form and shall

include, without limiting the generality of the foregoing, all reports; memoranda; books or notebooks; written or recorded statements, interviews, affidavits and depositions; all letters or correspondence; telegrams, cables and telex messages; contracts, leases, insurance policies or other agreements; warnings and caution/hazard notices or labels; mechanical and electronic recordings and all information so stored, or transcripts of such recordings; calendars, appointment books, schedules, agendas and diary entries; notes or memoranda of conversations (telephonic or otherwise), meetings or conferences; legal pleadings and transcripts of legal proceedings; maps, models, charts, diagrams, graphs and other demonstrative materials; financial statements, annual reports, balance sheets and other accounting records; quotations or offers; bulletins, newsletters, pamphlets, brochures and all other similar publications; summaries or compilations of data; deeds, titles, or other instruments of ownership; blueprints and specifications; manuals, guidelines, regulations, procedures, policies and instructional materials of any type; photographs or pictures, film, microfilm and microfiche; videotapes; articles; announcements and notices of any type; surveys, studies, evaluations, tests and all research and development (R&D) materials; newspaper clippings and press releases; time cards, employee schedules or rosters, and other payroll records; cancelled checks, invoices, bills and receipts; and writings of any kind and all other tangible things upon which any handwriting, typing, printing, drawings, representations, graphic matter, magnetic or electrical impulses, or other forms of communication are recorded or produced, including audio and video recordings, computer stored information (whether or not in printout form), computer-readable media or other electronically maintained or

transmitted information, and all other rough drafts, revised drafts (including all handwritten notes or other marks on the same) and copies of documents as hereinbefore defined by whatever means made.

(11) For any document withheld on the basis of privilege, state the following: date; author; addressee; indicated or blind copies; all persons to whom distributed, shown, or explained; and, the nature and legal basis for the privilege asserted.

(12) In the event any document called for has been destroyed or transferred beyond the control of the company, please state: the identity of the person by whom it was destroyed or transferred, and the person authorizing the destruction or transfer; the time, place, and method of destruction or transfer; and, the reason(s) for its destruction or transfer. If destroyed or disposed of by operation of a retention policy, state the retention policy.

(13) Please provide written responses, together with any and all exhibits pertaining thereto, in one or more bound volumes, separately indexed and tabbed by each response, in compliance with Kentucky Public Service Commission Regulations.

(14) NKU reserves the right to pose additional preliminary data requests on or before the due date specified in the Commission's procedural schedule.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "D. Howard II". The signature is stylized and cursive.

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**COUNSEL FOR NORTHERN KENTUCKY
UNIVERSITY**

NKU'S INITIAL REQUESTS FOR INFORMATION TO DEK
CASE NO. 2019-00271

General

1. To the extent not already provided, please provide all Section M schedules in Excel format with all formulas intact.
2. To the extent not already provided, please provide all Section N schedules in Excel format with all formulas intact.
3. 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.
4. 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.

Questions with Respect to the Direct Testimony of Mr. Jeff L. Kern

5. 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.
6. To the extent not already provided, please provide in Excel format with all formulas intact all attachments to Mr. Kern's direct testimony.
7. 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.
8. 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.

Questions with Respect to the Direct Testimony of Mr. James E. Ziolkowski

9. 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.
10. To the extent not already provided, please provide in Excel format with all formulas intact all attachments to Mr. Ziolkowski's direct testimony.
11. 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.
12. 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.

Questions with Respect to the Direct Testimony of Mr. Zachary Kuznar, PhD

13. 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?

CERTIFICATE OF SERVICE

I certify that the foregoing is a true and accurate copy of the same document being filed in paper medium with the Commission; that the electronic filing was transmitted to the Commission on October 14, 2019; that there are no parties that the Commission has excused from participation by electronic means in this proceeding; and that one original and one copy of the filing in paper medium are being delivered to the Commission within two (2) business days.



Dennis G. Howard, II