

**VERIFICATION**

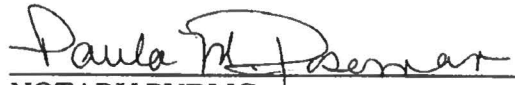
**STATE OF INDIANA** )  
 ) **SS:**  
**COUNTY OF HENDRICKS** )

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 post-hearing 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 2<sup>nd</sup> day of March, 2020.



  
\_\_\_\_\_  
NOTARY PUBLIC  
Resident: Hendricks County  
My Commission Expires: 3-17-25

**VERIFICATION**

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 post-hearing data requests, and that the answers contained therein are true and correct to the best of her knowledge, information and belief.

*S E L*

\_\_\_\_\_  
Sarah E. Lawler Affiant

Subscribed and sworn to before me by Sarah E. Lawler on this 27<sup>th</sup> day of February, 2020.

*E. Minna Rolfes-Adkins*

\_\_\_\_\_  
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**  
**Attorney General's First Set Post-Hearing Data Requests**  
**Date Received: February 25, 2020**

**AG-POST-HEARING-DR-01-001**

**REQUEST:**

Refer to Video Transcript Evidence ("VTE"), February 20, 2020, at 10:19:00 – 10:21:00.

Refer to DEK's Response to AG DR 2-55, which states that the actual cost of vegetation management through October 2019 was \$4.87 Million.

- a. Provide the final total cost for vegetation management in 2019.

**RESPONSE:**

O&M 2019 actuals for Duke Energy Kentucky was \$6.03 Million.

**PERSON RESPONSIBLE:** TK Christie

**Duke Energy Kentucky**  
**Case No. 2019-00271**  
**Attorney General's First Set Post-Hearing Data Requests**  
**Date Received: February 25, 2020**

**AG-POST-HEARING-DR-01-002**

**REQUEST:**

Confirm that the intercompany Administrative & General rent expense totaling \$914,966 in Account 931008 was not included in the test period.

- a. Confirm that Account 931008 included no other expenses.
- b. Confirm that funds in Account 931008 are the only funds upon which DEK bases its return on DEBS assets.
- c. Confirm that DEK included no other funds in the test year upon which to earn a return on DEBS assets.

**RESPONSE:**

Confirmed. See response to STAFF-POST-HEARING-DR-01-015. See also page 26, Line 1 of Ms. Lawler's rebuttal testimony.

- a. See "Forecasted Period" tab of the Company's SFR model noting \$0 included in Account 931008.
- b. Account 931008 is the only place that the return on DEBS assets is recorded in the Company's financial statements.
- c. The Company has not included a return on DEBS assets anywhere in the test period in this case. As previously communicated in response to discovery questions and rebuttal testimony of Ms. Lawler and Mr. Setser, this was unintentional, but nonetheless has not been included.

**PERSON RESPONSIBLE:** Sarah E. Lawler