

**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.



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

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



\_\_\_\_\_  
NOTARY PUBLIC

My Commission Expires: July 8, 2022

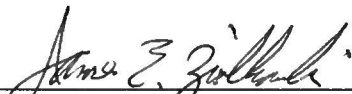


**E. MINNA ROLFES-ADKINS**  
Notary Public, State of Ohio  
My Commission Expires  
July 8, 2022

**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 post-hearing data requests, and that the answers contained are 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 27<sup>TH</sup> day of FEBRUARY, 2020.



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

The undersigned, Melissa Abernathy, Manager Accounting II, being duly sworn, deposes and says that she has personal knowledge of the matters set forth in the foregoing poste-hearing data requests, and that the answers contained therein are true and correct to the best of her knowledge, information and belief.

*Melissa B Abernathy*  
Melissa Abernathy, Affiant

Subscribed and sworn to before me by Melissa Abernathy on this 4 day of March, 2020.



*Virginia M. Adams*  
NOTARY PUBLIC

My Commission Expires: 10/2/21

**VERIFICATION**

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

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 poste-hearing data requests, and that the answers contained therein are 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 28 day of February 2020.



  
\_\_\_\_\_  
NOTARY PUBLIC

My Commission Expires: 06/08/2020



**VERIFICATION**

STATE OF OHIO )  
 ) SS:  
COUNTY OF HAMILTON )


The undersigned, Jeff L. Kern, Lead Rates & Reg Strat Analyst, being duly sworn, deposes and says that he 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 his knowledge, information and belief.

  
Jeff L. Kern, Affiant

Subscribed and sworn to before me by Jeff L. Kern, on this 3<sup>RD</sup> day of MARCH, 2020.



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

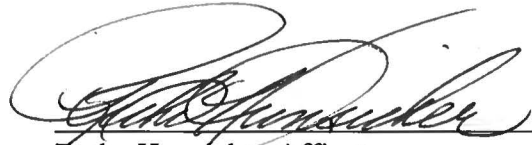
  
NOTARY PUBLIC

My Commission Expires: 1/5/2024

**VERIFICATION**

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

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 post-hearing data request and that it is true and correct to the best of her knowledge, information and belief.

  
\_\_\_\_\_  
Retha Hunsicker Affiant

Subscribed and sworn to before me by Retha Hunsicker on this 26 day of February, 2020.

  
\_\_\_\_\_  
NOTARY PUBLIC

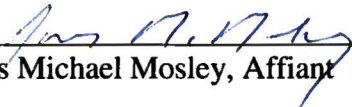


My Commission Expires: 9/17/2024

**VERIFICATION**

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

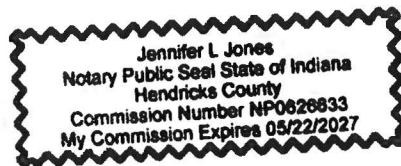
The undersigned, James Michael Mosley, Vice President Midwest Generation, being duly sworn, deposes and says that he has personal knowledge of the matters set forth in the foregoing post-hearing data requests, and that the answers contained therein are true and correct to the best of his knowledge, information and belief.

  
James Michael Mosley, Affiant

Subscribed and sworn to before me by James Michael Mosley on this 25 day of February, 2020.

  
NOTARY PUBLIC

My Commission Expires:



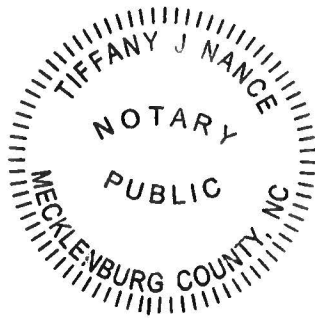
**VERIFICATION**

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

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 post-hearing 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 2 day of March, 2020.



  
\_\_\_\_\_  
NOTARY PUBLIC

My Commission Expires: February 1, 2023

**VERIFICATION**

STATE OF OHIO                    )  
  )     SS:  
COUNTY OF HAMILTON        )

The undersigned, Ash M. Norton, Director, Asset Management, 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.

Ash M. Norton  
Ash M. Norton, Affiant

Subscribed and sworn to before me by Ash M. Norton, on this 5th day of March, 2020.

E. Minna Rolfes-Adkins  
NOTARY PUBLIC

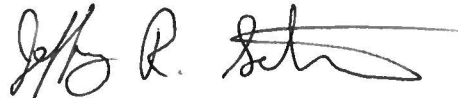
My Commission Expires: July 8, 2022



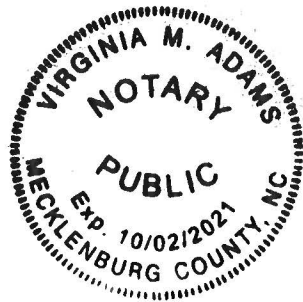
VERIFICATION

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 post-hearing data requests, and that the answers contained therein are 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 27 day of Feb., 2020.



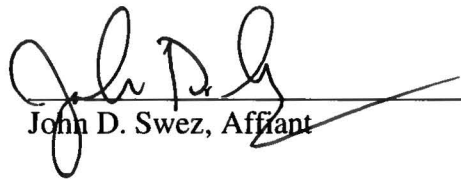
  
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NOTARY PUBLIC

My Commission Expires: 10/2/21

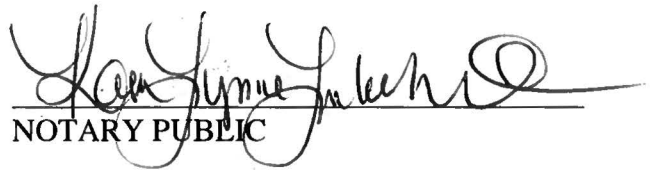
**VERIFICATION**

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

The undersigned, John D. Swez, Manager Director Trading and Dispatch, being duly sworn, deposes and says that he 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 his knowledge, information and belief.

  
\_\_\_\_\_  
John D. Swez, Affiant

Subscribed and sworn to before me by John D. Swez on this 27<sup>th</sup> day of February  
2020.

  
\_\_\_\_\_  
NOTARY PUBLIC

My Commission Expires: 3/26/22

**KARA LYNNE LUKEHART**  
**NOTARY PUBLIC**  
**LINCOLN COUNTY, NC**  
**My Commission Expires 3/26/22**

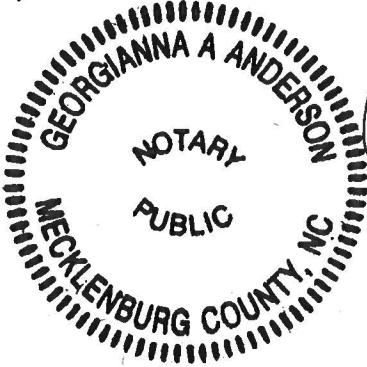
VERIFICATION

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 post-hearing data request and that it is true and correct to the best of her knowledge, information and belief.

*Danielle L. Weatherston*  
Danielle L. Weatherston, Affiant

Subscribed and sworn to before me by Danielle L. Weatherston on this \_\_\_\_ day of February 28<sup>th</sup>, 2020.



*Georgianna A Anderson*  
NOTARY PUBLIC

My Commission Expires: August 18, 2021



VERIFICATION

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

*John R. Panizza*  
\_\_\_\_\_  
John R. Panizza Affiant

Subscribed and sworn to before me by John R. Panizza on this 25 day of Feb., 2020.

*Virginia M. Adams*  
\_\_\_\_\_  
NOTARY PUBLIC

My Commission Expires:

*10/2/21*



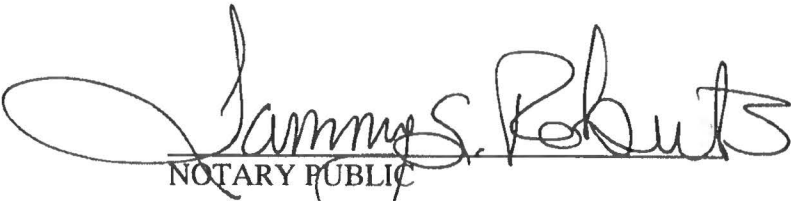
**VERIFICATION**

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

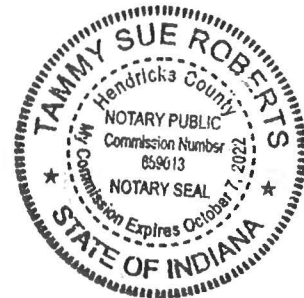
The undersigned, Thomas Christie, Director Distribution Vegetation Management, being duly sworn, deposes and says that he has personal knowledge of the matters set forth in the foregoing data request and that it is true and correct to the best of his knowledge, information and belief.

  
\_\_\_\_\_  
Thomas Christie, Affiant

Subscribed and sworn to before me by Thomas Christie on this 6<sup>th</sup> day of March, 2020.

  
\_\_\_\_\_  
NOTARY PUBLIC

My Commission Expires: 10/7/2022



**KyPSC Case No. 2019-00271**  
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**Duke Energy Kentucky**  
**Case No. 2019-00271**  
**Staff's First Set Post-Hearing Data Requests**  
**Date Received: February 24, 2020**

**STAFF-POST-HEARING-DR-01-001**

**REQUEST:**

Refer to Duke Kentucky's response to Commission Staff's Third Request for Information (Staff's Third Request), Item 27, and the Attorney General's First Request for Information (Attorney General's First Request), Item 81.

- a. Explain the change in the treatment of credits related to Loss on Sale of Accounts Receivable and explain how that change affects the cost-of-service study (COSS) results.
- b. Provide a revised COSS that incorporates credits related to Loss on Sale of Accounts Receivable in Customer Accounting Expenses in account 903250, to reflect the same treatment that these credits were given in Case No. 2017-00321.<sup>1</sup>

**RESPONSE:**

- a. In Case No. 2017-00321, credits related to the loss on the sale of accounts receivable were included in Customer Accounting Expense in Account 903250. In the forecast prepared for the current case the credits were included in Accounts 426509, Loss on the Sale of Accounts Receivable and 426591, Intercompany Loss on the Sale of Accounts Receivable. The total credit included in these accounts, (\$1,241,796), was inadvertently excluded from the revenue requirement. As

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<sup>1</sup> Case No. 2017-00321, *Electronic Application of Duke Energy Kentucky, Inc. for 1) An Adjustment of the Electric Rates; 2) Approval of an Environmental Compliance Plan and Surcharge Mechanism; 3) Approval of New Tariffs; 4) Approval of Accounting Practices to Establish Regulatory Assets and Liabilities; and 5) All Other Required Approvals and Relief* (Ky. PSC Apr. 13. 2018).

explained in the rebuttal testimony of Sarah E. Lawler, the Company also inadvertently excluded costs of \$914,966 included in Account 931008 that represent a return on DEBS assets. As Ms. Lawler explained, the Company is not proposing to make an adjustment to increase its proposed test year revenue requirement for this omission. However, if the Commission decides to make an adjustment to the test year revenue requirements to include the credits for the loss on sale of accounts receivable, the Company believes that in the interest of fairness, that it would be proper to offset the credits by the amount of the return on DEBS assets that was also inadvertently excluded.

- b. See STAFF-POST-HEARING-DR-01-001 Attachment. The Customer Accounting Expense has been reduced by \$1,241,796 in this revised COSS model.

**PERSON RESPONSIBLE:** Sarah E. Lawler – a.  
James E. Ziolkowski – b.

**STAFF-POST-HEARING-DR-01-001 ATTACHMENT  
BEING PROVIDED ON CD**

**Duke Energy Kentucky**  
**Case No. 2019-00271**  
**Staff's First Set Post-Hearing Data Requests**  
**Date Received: February 24, 2020**

**STAFF-POST-HEARING-DR-01-002**

**REQUEST:**

Duke Kentucky's response to the Attorney General's First Request, Item 33, calculated the increase in the forecasted test-year depreciation expense exclusively from the proposed depreciation rates, i.e., the plant values remained constant. That increase was \$7.4 million. Duke Kentucky's base period depreciation expense was \$46.5 million and its forecasted test-year expense was \$58 million, a difference of \$11.5 million. Please explain how the change in rates accounts for 65 percent of the proposed increase if most of the increase is due to large capital additions at Duke Kentucky's generating facilities.

**RESPONSE:**

The \$7,431,243 provided in response to AG-DR-01-033 is calculated as follows:

1. *Current* depreciation rates (approved in Case No. 2017-00321) multiplied by the 13-month average test period plant in-service balances is \$50,766,552.
2. *Proposed* depreciation rates multiplied by the 13-month average test period plant in-service balances is \$58,197,795.
3.  $\$58,197,795 - \$50,766,552 = \$7,431,243$ .

As illustrated above, the \$7,431,243 is a comparison of old and new depreciation rates on the same 13-month average test period plant in-service balances.

The total difference in depreciation expense between the base period and forecasted period of \$11.5 million is due to both increases in plant in-service balances from the



beginning of the base period (December 2018) and the end of the forecasted test period (March 2021) and applying proposed rates to the 13-month average test period plant in-service balances.

When Mr. Spanos stated during the hearing that the majority of the increase in depreciation expense was related to large capital additions at Duke Energy Kentucky's generation facilities, he was referring to drivers causing depreciation rates to change between the two depreciation studies he performed: the depreciation study he performed in this case on plant in-service balances as of 12/31/18 vs. the depreciation study he performed in the Company's last electric base rate case (Case No. 2017-00321) on plant in-service balances as of 12/31/16. Those depreciation studies included all plant in-service balances on the Company's books and records, regardless of where those assets are recovered (i.e. base rates or Rider ESM). A large portion of the capital additions he was referring to were environmental capital additions at the Company's East Bend generating station placed in service between 12/31/16 and 12/31/18 and are included in the Company's Rider ESM and are not reflected in the depreciation expense for base rates in this case. The change in depreciation expense related to the change in depreciation rates on the Company's total plant in-service balances as of December 31, 2018 coincidentally was estimated at \$7.5 million. But this is a different calculation than the \$7,431,243 provided by the Company in response to AG-DR-01-033.

The proposed change in depreciation rates accounts for 65 percent of the proposed increase because there were capital additions made to generation assets that are of the nature that are necessary to be made to reach the existing retirement date. When capital additions are made without creating an extension of the life span of the asset, the

depreciation rate must increase so that the asset is fully depreciated at the end of its useful life.

**PERSON RESPONSIBLE:** Melissa B. Abernathy  
Christopher M. Jacobi

**Duke Energy Kentucky**  
**Case No. 2019-00271**  
**Staff's First Set Post-Hearing Data Requests**  
**Date Received: February 24, 2020**

**PUBLIC STAFF-POST-HEARING-DR-01-003**  
**(As to Attachment only)**

**REQUEST:**

Provide the final design of the Revert to Owner program and the language Duke Kentucky will include in its tariff once the proposed program is implemented.

**RESPONSE:**

**CONFIDENTIAL PROPRIETARY TRADE SECRET (As to Attachment only)**

Please see STAFF-POST-HEARING-DR-01-003 Confidential Attachment for the design of the Revert to Owner Program. If the Commission directs the Company to include a description of the program in the tariff, then the Company would propose including the following language in its tariff as Section 11 of Sheet No. 25 once the program is implemented:

**Landlord Programs**

Company will provide a Revert to Owner program available to Landlords to provide continuity in service when a tenant notifies the Company to discontinue service by automatically switching the account to the Landlord until a new tenant sets up service or the Landlord requests to discontinue service. The program is not applicable in situations where a tenant has been disconnected for nonpayment or the Company has been notified of a safety issue that warrants the termination of service. The provisions of the Revert to Owner program are outlined below.

A self-service Landlord experience will be available via the Company's website. Landlords will have the opportunity to enroll and manage properties in the Revert to Owner program.

**Eligibility and Enrollment**

1. Eligibility to enroll in the Revert to Owner program requires any delinquent balance associated to the Landlord to be paid.
2. An email address is required to participate in the program.
3. The Landlord is responsible for requesting the enrollment of additional properties or removing properties from the program as necessary and will be responsible for all charges associated to the properties enrolled while service is/was in their name.
4. Terms and conditions of the program will be accepted at time of enrollment and an email will be provided with these as well
5. Landlords with enrolled in the program will not be required to pay a security deposit for those properties; however, if a property is removed from the program, the account will be subject to standard deposit policies.
6. The Company shall maintain the discretion to remove a Landlord from the program for failure to pay.
7. Where a landlord prefers not to self-service enrollment and maintain a digital experience, the Landlord may request enrollment via Duke Energy Customer Care.
8. Non-self-serving landlords will still maintain the same eligibility requirements to participate in the Program.

### **Property Management**

1. Landlord's with properties enrolled in the program will be required to recertify those properties every two years for the purpose of verifying continued ownership. Should recertification not be completed for one or more of the properties enrolled in the program, the properties will be removed from the program and the Landlord will be required to re-enroll.
2. Notification will be sent via email to the Landlord to advise to log in at the Company's website and recertify via the self-service Landlord experience or contact Duke Energy's Customer Care to request completion of recertification
3. Non-self-servicing landlords will still be subject to the same recertification policies.

**PERSON RESPONSIBLE:** Jeff L. Kern

**CONFIDENTIAL PROPRIETARY TRADE  
SECRET**

**STAFF-POST-HEARING DR-01-003  
CONFIDENTIAL ATTACHMENT**

**FILED UNDER SEAL**

**Duke Energy Kentucky**  
**Case No. 2019-00271**  
**Staff's First Set Post-Hearing Data Requests**  
**Date Received: February 24, 2020**

**STAFF-POST-HEARING-DR-01-004**

**REQUEST:**

Provide the proposed tariff language for the Automatic Landlord program.

**RESPONSE:**

If the Commission directs the Company to include the details of the Automatic Landlord program in its tariff, the Company will propose the following language as Section 11 of Sheet No. 25:

**Landlord Programs**

The Company will provide an Automatic Landlord Transfer Agreement program available to Landlords, property managers, or other property owners to provide continuity in service when a tenant notifies the Company to discontinue service by automatically switching the account to the Landlord until a new tenant sets up service or the Landlord requests to discontinue service. The program is not applicable in situations where a tenant has been disconnected for nonpayment or the Company has been notified of a safety issue that warrants the termination of service. The provisions of the Automatic Landlord Transfer Agreement are outlined below.

**Eligibility and Enrollment**

1. Eligibility to enroll in the Automatic Landlord Transfer Agreement requires any delinquent balance associated to the Landlord to be paid.

2. Landlord must provide in writing a list of properties they wish to enroll in the program on a contract provided by the Company.
3. The Landlord is responsible for requesting the enrollment of additional properties or removing properties from the program as necessary and will be responsible for all charges associated to the properties enrolled while service is/was in their name.
4. Requests to remove properties from the contract or to terminate the contract in its entirety requires written notification to the Company two weeks in advance of the necessary changes.
5. The Landlord is responsible for notifying the Company of any changes in mailing address.
6. The Company shall maintain the discretion to remove a Landlord from the program for failure to pay.

**PERSON RESPONSIBLE:** Jeff L. Kern



**Duke Energy Kentucky**  
**Case No. 2019-00271**  
**Staff's First Set Post-Hearing Data Requests**  
**Date Received: February 24, 2020**

**STAFF-POST-HEARING-DR-01-005**

**REQUEST:**

Provide a sample of the detailed bill format reflecting the language indicating how a customer would opt in to the condensed bill format.

**RESPONSE:**

The Company's new bill format provides customers an opportunity to request condensed billing by contacting Customer Service; this information is provided on page 2 (back of the first page of the bill) in the "We're Here for You" section of the Company's new bill format – both condensed and detail (shown on pages 3 and 5 of Attachment RH-1 included with the direct testimony of Company witness Retha Hunsicker). Once Customer Connect is fully deployed in the fall 2022, the Company intends to add an electronic option for customers to opt-in to condensed billing via its website and will also make this information available on the back of its bill as shown on the exhibit.

Currently, customers have the option to opt-in to condensed billing via an indicator on the bill stub, and in the last 12 months, no customers have requested this option. Additionally, there are currently less than 10 Duke Energy Kentucky accounts that have requested condensed billing.

**PERSON RESPONSIBLE:** Retha Hunsicker

**Duke Energy Kentucky  
Case No. 2019-00271  
Staff's First Set Post-Hearing Data Requests  
Date Received: February 24, 2020**

**STAFF-POST-HEARING-DR-01-006**

**REQUEST:**

Provide a sample of how the detailed and condensed bill formats would look if the Commission approves Duke Kentucky's request for a waiver from 807 KAR 5:006, Section 7(1)(a)3.

**RESPONSE:**

Please see STAFF-POST-HEARING-DR-01-006 Attachments 1 and 2 for samples of how usage will be displayed on the condensed and detailed bill if the Commission approves the Company's request for a waiver from 807 KAR 5:006, Section 7(1)(a)(3).

**PERSON RESPONSIBLE:** Retha Hunsicker



## Your Energy Bill

page 1 of 2

**Service address**  
 750 Any Street  
 Florence KY 41042

**Bill date** Feb 26, 2020  
**For service** Jan 27 – Feb 25  
 29 days

Account number **999 999 999**

### Billing summary

|                                |                  |
|--------------------------------|------------------|
| Previous amount due            | \$ 881.09        |
| Payment received Feb 20        | - 881.09         |
| Current electric charges       | 779.56           |
| Taxes                          | 71.57            |
| <b>Total amount due Mar 19</b> | <b>\$ 851.13</b> |

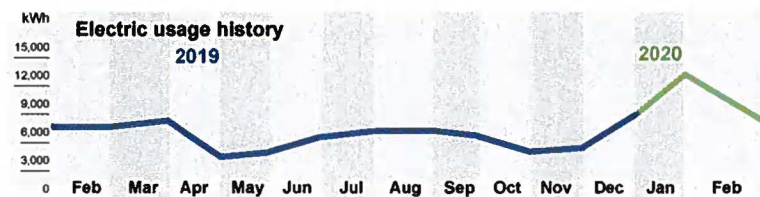


Thank you for your payment.

Your current rate is Distribution Service (DS01).

For a complete listing of all Kentucky business rates and riders, visit [duke-energy.com/business/billing/rates](http://duke-energy.com/business/billing/rates).

### Your usage snapshot



|          | Current Month | Feb 2019 | 12-Month Usage | Average Monthly Usage |
|----------|---------------|----------|----------------|-----------------------|
| Electric | 8,240         | 10,480   | 84,000         | 7,000                 |

12-Month usage based on most recent history

**Current electric usage for meter number 999999999**

|              |                  |
|--------------|------------------|
| Usage period | Jan 27 to Feb 25 |
| Multiplier   | 80               |
| kWh usage    | 8,240            |
| Demand read  | 00.28            |
| Actual kW    | 22.40            |

A kilowatt-hour (kWh) is a measure of the energy used by a 1,000-watt appliance in one hour. A 10-watt LED lightbulb would take 100 hours to use 1 kWh.

A multiplier is the factor that the meter reading is multiplied by to determine the correct energy usage.

**Mail your payment at least 7 days before the due date or pay instantly at [duke-energy.com/billing](http://duke-energy.com/billing). Late payments are subject to a 5% late charge.**

Please return this portion with your payment. Thank you for your business.



P.O. Box 1326  
 Charlotte NC 28201-1326

Account number **999 999 999**

### Amount due

**\$ 851.13**  
 by Mar 19

After Mar 19, the amount due will increase to \$890.11.

\$ \_\_\_\_\_  
 Add here, to help others with a contribution to WinterCare

\$ \_\_\_\_\_  
**Amount enclosed**

000549 0000024295



**Company ABC**  
 750 Any Street  
 Florence KY 41042

P.O. Box 1326  
 Charlotte NC 28201-1326



09880389 0 9752709 1 000011588 6 000011588 6 000011588 6



## We're here for you

### Report an emergency

|                     |                         |
|---------------------|-------------------------|
| Electric/Gas outage | duke-energy.com/outages |
| Electric            | 800.543.5599            |
| Gas                 | 800.634.4300            |

### Convenient ways to pay your bill

|                                      |   |
|--------------------------------------|---|
| Online                               | duke-energy.com/billing                   |
| Automatically from your bank account | duke-energy.com/autodraft                 |
| Speedpay (fee applies)               | duke-energy.com/pay-now<br>800.544.6900   |
| By mail payable to Duke Energy       | P.O. Box 1326<br>Charlotte, NC 28201-1326 |
| In person                            | duke-energy.com/location                  |

### Help managing your account

|                                     |                            |
|-------------------------------------|----------------------------|
| Register for free paperless billing | duke-energy.com/paperless  |
| Update your account information     | duke-energy.com/my-account |
| Mobile website                      | duke-energy.com/my-account |

### Correspond with Duke Energy

P.O. Box 1326  
Charlotte, NC 28201

### Contact Duke Energy

|                              |                     |
|------------------------------|---------------------|
| Online                       | duke-energy.com     |
| Call (7 a.m. to 7 p.m.)      | 800.544.6900        |
| For hearing impaired TDD/TTY | 800.648.6056 or 711 |

### Request the condensed or detailed bill format

Call (7 a.m. to 7 p.m.) 800.544.6900

### Important to know

#### Your next meter reading: Mar 25

Please be sure we can safely access your meter for actual readings. Don't worry if your digital meter flashes eights from time to time. That's a normal part of the energy measuring process.

#### Your electric service may be disconnected if your payment is past due

If payment for your electric service is past due, we may begin disconnection procedures. If your service is disconnected because of missed payment, you must pay your past-due balance in full, plus reconnection fee, before your service will be reconnected. The reconnection fee is \$45 for electric service that may be reconnected remotely, \$75 for electric service that is not eligible to be reconnected remotely, and \$25 for gas service. In such situations when both electric and gas service are disconnected for non-payment, the reconnection fee will not exceed \$80 for both. A security deposit may also be required.

#### Electric service does not depend on payment for other products or services

Non-payment for non-regulated products or services (such as surge protection or equipment service contracts) may result in removal from the program but will not result in disconnection of electric service.

#### When you pay by check

We may process the payment as a regular check or convert it into a one-time electronic check payment.

#### Para nuestros clientes que hablan Español

Representantes bilingües están disponibles para asistirle de lunes a viernes de 7 a.m. - 7 p.m. Para obtener más información o reportar problemas con su servicio eléctrico, favor de llamar al 800.544.6900.





## Your Energy Bill

page 1 of 3

**Service address**  
 750 Any Street  
 Florence KY 41042

**Bill date** Feb 26, 2020  
**For service** Jan 27 – Feb 25  
 29 days

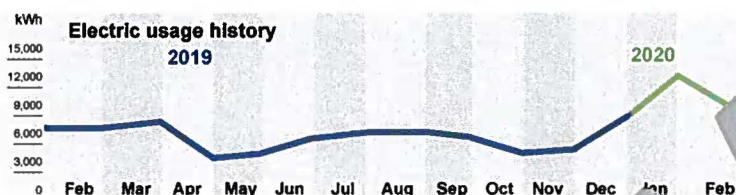
**Account number** 999 999 999

### Billing summary

|                                |                  |
|--------------------------------|------------------|
| Previous amount due            | \$ 881.09        |
| Payment received Feb 20        | - 881.09         |
| Current electric charges       | 779.56           |
| Taxes                          | 71.57            |
| <b>Total amount due Mar 19</b> | <b>\$ 851.13</b> |

**\$**  
 Thank you for your payment.

### Your usage snapshot



|          | Current Month | Feb 2019 | 12-Month Usage | Average Monthly Usage |
|----------|---------------|----------|----------------|-----------------------|
| Electric | 8,240         | 10,480   | 84,000         | 7,000                 |

12-Month usage based on most recent history

| Current electric usage for meter number 99999999 |                  |
|--|------------------|
| Usage period                                     | Jan 27 to Feb 25 |
| Multiplier                                       | 80               |
| kWh usage  | 8,240            |
| Demand read                                      | 00.28            |
| Actual kW  | 22.40            |

**💡**  
 A kilowatt-hour (kWh) is a measure of the energy used by a 1,000-watt appliance in one hour. A 10-watt LED lightbulb would take 100 hours to use 1 kWh.  
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P.O. Box 1326  
 Charlotte NC 28201-1326

Account number 999 999 999

### Amount due

**\$ 851.13**  
 by Mar 19

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\$ \_\_\_\_\_  
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\$ \_\_\_\_\_  
**Amount enclosed**

000549 0000024295



**Company ABC**  
 750 Any Street  
 Florence KY 41042



P.O. Box 1326  
 Charlotte NC 28201-1326



09880389 0 9752709 1 000011588 6 000011588 6 000011588 6



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|                     |  |
|---------------------|--|
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|--------------------------------------|--|
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| Automatically from your bank account | <a href="http://duke-energy.com/autodraft">duke-energy.com/autodraft</a>             |
| Speedpay (fee applies)               | <a href="http://duke-energy.com/pay-now">duke-energy.com/pay-now</a><br>800.544.6900 |
| By mail payable to Duke Energy       | P.O. Box 1326<br>Charlotte, NC 28201-1326  |
| In person                            | <a href="http://duke-energy.com/location">duke-energy.com/location</a>               |

### Help managing your account

|                                     |  |
|-------------------------------------|--|
| Register for free paperless billing | <a href="http://duke-energy.com/paperless">duke-energy.com/paperless</a>           |
| Update your account information     | <a href="http://duke-energy.com/my-account">duke-energy.com/my-account</a>         |
| Mobile website                      | <a href="http://duke-energy.com/mobile-account">duke-energy.com/mobile-account</a> |

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P.O. Box 1326  
Charlotte, NC 28201

### Contact Duke Energy

|                              |  |
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| Online                       | <a href="http://duke-energy.com">duke-energy.com</a> |
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| For hearing impaired TDD/TTY | 800.648.6056 or 711                                  |

### Request the condensed or detailed bill format

Call (7 a.m. to 7 p.m.) 800.544.6900

### Important to know

#### Your next meter reading: Mar 25

Please be sure we can safely access your meter for actual readings. Don't worry if your digital meter flashes eights from time to time. That's a normal part of the energy measuring process.

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#### Electric service does not depend on payment for other products or services

Non-payment for non-regulated products or services (such as surge protection or equipment service contracts) may result in removal from the program but will not result in disconnection of electric service.

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### Billing details – Electric

| Duke Energy delivery                    |                |
|---|----------------|
| Customer charge                         | \$34.28        |
| Demand charge                           |                |
| 15.00 kW @ \$0.00000000                 | 0.00           |
| 7.40 kW @ \$8.25000000                  | 61.05          |
| Energy charge                           |                |
| 6,000 kWh @ \$0.08020000                | 481.20         |
| 2,240 kWh @ \$0.04923200                | 110.28         |
| Demand side management rider            |                |
| 8,240 kWh @ \$0.00502400                | 41.40          |
| Profit sharing mechanism                |                |
| 8,240 kWh @ \$0.00010300                | 0.85           |
| Electric fuel adjustment                |                |
| 8,240 kWh @ -\$0.00018600               | - 13.68        |
| Environmental Surcharge Mechanism Rider | 64.18          |
| <b>Current electric charges</b>         | <b>\$71.56</b> |

Your current rate is Distribution Service (DS01).

Riders are costs to cover investments in improving the energy infrastructure and other additional expenses.

For a complete listing of all Kentucky business rates and riders, visit [duke-energy.com/business/billing/rates](http://duke-energy.com/business/billing/rates).

### Billing details – Taxes

| Explanation of taxes         |                |
|------------------------------|----------------|
| Rate increase for school tax | \$23.39        |
| Kentucky state tax           | 48.18          |
| <b>Total taxes</b>           | <b>\$71.57</b> |

**Duke Energy Kentucky**  
**Case No. 2019-00271**  
**Staff's First Set Post-Hearing Data Requests**  
**Date Received: February 24, 2020**

**PUBLIC STAFF-POST-HEARING-DR-01-007**  
**(As to Attachments only)**

**REQUEST:**

With respect to Duke Kentucky's East Bend generation facility's coal combustion residual landfills, provide the following information and documents:

- a. A breakdown of all costs incurred by Duke Kentucky to acquire fly ash for East Bend from other entities in the last five years, including the cost, if any, of the fly ash itself and any cost for transporting the fly ash to East Bend;
- b. A breakdown of any revenue that Duke Kentucky has received for taking fly ash to its East Bend landfills in the last five years;
- c. A list of the entities that supply or have supplied Duke Kentucky with fly ash for East Bend in the last five years.
- d. The amount of fly ash that has been taken from each such entity in each of the last five years;
- e. An explanation of the amount of fly ash that Duke Kentucky is contractually obligated to take from any entity for placement in East Bend's landfills; and
- f. A copy of the contracts with each such entity related to fly ash taken or to be taken to East Bend.



**RESPONSE:**

**CONFIDENTIAL PROPRIETARY TRADE SECRET (As to Attachments only)**

a.

|                  | <u>2015</u> | <u>2016</u> | <u>2017</u> | <u>2018</u> | <u>2019</u> |
|------------------|-------------|-------------|-------------|-------------|-------------|
| Trucking expense | \$559,392   | \$615,490   | \$551,229   | \$366,569   | \$317,814   |
| Fly ash cost     | -           | 71,939      | 39,126      | 28,234      | 10,744      |
| Total expense    | \$559,392   | \$687,429   | \$590,355   | \$394,803   | \$328,557   |

b.

|             | <u>2015</u> | <u>2016</u> | <u>2017</u> | <u>2018</u> | <u>2019</u> |
|-------------|-------------|-------------|-------------|-------------|-------------|
| Dynergy fee | \$49,292    | \$57,015    | \$94,507    | \$24,560    | \$0         |

c.

| <i>(In tons)</i>                | <u>2015</u>   | <u>2016</u>   | <u>2017</u>   | <u>2018</u>   | <u>2019</u>   |
|---------------------------------|---------------|---------------|---------------|---------------|---------------|
| Zimmer/Miami Fort (Duke Energy) | 19,943        | -             | -             | -             | -             |
| Zimmer/Miami Fort (Dynergy)     | 40,545        | 50,221        | 43,225        | 25,525        | 25,534        |
| Ghent (Kentucky Utilities)      | 819           | 12,744        | 7,384         | 5,387         | 2,051         |
| St. Bernard (DTE Energy)        | 14,146        | 467           | -             | -             | -             |
| Clifty Creek (IKEC)             | -             | -             | 465           | -             | -             |
|                                 | <u>75,453</u> | <u>63,432</u> | <u>51,074</u> | <u>30,912</u> | <u>27,585</u> |

d. See response to item (c).

e. In the "Agreement for the Supply of Fly Ash" between Dynergy Miami Fort/Dynergy Zimmer and Duke Energy Kentucky for the years 2017 to 2019, it states that a minimum amount of 40,000 tons per year shall be supplied and accepted. The amount taken in 2018 and 2019 was below the minimum, but the condition in the agreement was waived for those two years and removed from the contract moving forward.

f. Zimmer/Miami Fort (Dynergy) – STAFF-POST-HEARING-DR-01-007  
Confidential Attachments 1 & 2

Ghent – STAFF-POST-HEARING-DR-01-007 Confidential Attachment 3

St. Bernard – STAFF-POST-HEARING-DR-01-007 Confidential Attachments 4,  
5, & 6

Clifty Creek – No contract. Trial run.

For the Zimmer and Miami Fort units, no fly ash agreements are available for the year 2015 since this is the year these plants were sold by Duke Energy. Beginning in 2016, an agreement with Dynegy was in place and is attached to this response. With regard to the Ghent generating station, Duke Energy Kentucky and Kentucky Utilities continue to operate pursuant to the terms of the attached 2016 agreement.

**PERSON RESPONSIBLE:** James Michael Mosley

**CONFIDENTIAL PROPRIETARY TRADE**

**SECRET**

**STAFF-POST-HEARING-DR-01-007**

**CONFIDENTIAL ATTACHMENT 1**

**FILED UNDER SEAL**

**CONFIDENTIAL PROPRIETARY TRADE**

**SECRET**

**STAFF-POST-HEARING-DR-01-007**

**CONFIDENTIAL ATTACHMENT 2**

**FILED UNDER SEAL**

**CONFIDENTIAL PROPRIETARY TRADE**

**SECRET**

**STAFF-POST-HEARING-DR-01-007**

**CONFIDENTIAL ATTACHMENT 3**

**FILED UNDER SEAL**

**CONFIDENTIAL PROPRIETARY TRADE**

**SECRET**

**STAFF-POST-HEARING-DR-01-007**

**CONFIDENTIAL ATTACHMENT 4**

**FILED UNDER SEAL**

**CONFIDENTIAL PROPRIETARY TRADE**

**SECRET**

**STAFF-POST-HEARING-DR-01-007**

**CONFIDENTIAL ATTACHMENT 5**

**FILED UNDER SEAL**

**CONFIDENTIAL PROPRIETARY TRADE**

**SECRET**

**STAFF-POST-HEARING-DR-01-007**

**CONFIDENTIAL ATTACHMENT 6**

**FILED UNDER SEAL**



**Duke Energy Kentucky**  
**Case No. 2019-00271**  
**Staff's First Set Post-Hearing Data Requests**  
**Date Received: February 24, 2020**

**STAFF-POST-HEARING-DR-01-008**

**REQUEST:**

Explain whether the costs incurred to acquire sufficient fly ash for East Bend to produce Poz-o-tec, including all costs identified in response to Item 6 (*sic*) herein, were included in the total estimated cost of the proposed project approved in Case No. 2016-00398.<sup>1</sup>

**RESPONSE:**

No costs from Item 7 were included in Case No. 2016-00398.

**PERSON RESPONSIBLE:** James Michael Mosley

---

<sup>1</sup> Case No. 2016-00398, *Electronic Application of Duke Energy Kentucky, Inc. for a Certificate of Public Convenience and Necessity Authorizing the Company to Close the East Bend Generating Station Coal Ash Impoundment and for All Other Required Approvals and Relief* (Ky. PSC June 6, 2017).

**Duke Energy Kentucky**  
**Case No. 2019-00271**  
**Staff's First Set Post-Hearing Data Requests**  
**Date Received: February 24, 2020**

**STAFF-POST-HEARING-DR-01-009**

**REQUEST:**

Provide an updated Schedule J that reflects the most current forward curve long-term and short-term interest rates.

**RESPONSE:**

Please see STAFF-POST-HEARING-DR-01-009 Attachment, calculated on February 26, 2020. The reduction in interest rates reflects the market's reaction to fears of the coronavirus slowing global growth with rates at or near historic all-time lows.

As a point of comparison, the Company calculated a forecasted long-term debt rate on January 9, 2020, and again on February 26, 2020. Overall the rate dropped 0.55%.

**as of Feb 26, 2020**

| Tenor   | Weight | 9/15/2020 | Current | Cpn   |
|---------|--------|-----------|---------|-------|
|         |        | UST       | Spread  |       |
| 5-yr    | 10%    | 1.20%     | 1.30%   | 2.50% |
| 10-yr   | 35%    | 1.41%     | 1.50%   | 2.91% |
| 30-yr   | 55%    | 1.87%     | 1.75%   | 3.62% |
| 20.5-yr |        | 1.64%     | 1.62%   | 3.26% |

**as of Jan 9, 2020**

| Tenor   | Weight | 9/15/2020 | Current | Cpn   |
|---------|--------|-----------|---------|-------|
|         |        | UST       | Spread  |       |
| 5-yr    | 10%    | 1.76%     | 1.30%   | 3.06% |
| 10-yr   | 35%    | 1.98%     | 1.50%   | 3.48% |
| 30-yr   | 55%    | 2.40%     | 1.75%   | 4.15% |
| 20.5-yr |        | 2.19%     | 1.62%   | 3.81% |

Similarly, short-term rates have also declined due to coronavirus fears. The Company short-term rates are based on one-month LIBOR. The Company calculated the 13-month average of one-month LIBOR as of on January 9, 2020, (1.53%) and again on February 26, 2020 (1.24%). Overall the rate dropped 0.29%.

The Company believes it would be inappropriate to adjust any component of its proposed return on rate base for the ephemeral impact of the coronavirus on the capital markets.

**PERSON RESPONSIBLE:** Christopher M. Jacobi

DUKE ENERGY KENTUCKY, INC.  
 CASE NO 2019-00271  
 COST OF CAPITAL SUMMARY  
 THIRTEEN MONTH AVERAGE BALANCE ENDING MARCH 31, 2021

DATA: BASE PERIOD "X" FORECASTED PERIOD  
 DATE OF CAPITAL STRUCTURE: END OF FORECASTED PERIOD  
 TYPE OF FILING: ORIGINAL "X" UPDATED REVISIONS  
 WORK PAPER REFERENCE NO(S): See Below

SCHEDULE J-1  
 PAGE 2 OF 2  
 WITNESS RESPONSIBLE:  
 C. M. JACOBI

| LINE NO. | CLASS OF CAPITAL                                       | REFERENCE | 13 MONTH AVG. BALANCE (\$) | % OF TOTAL | % COST | WEIGHTED COST % |
|----------|--|-----------|----------------------------|------------|--------|-----------------|
| 1        | Common Equity  |           | 699,348,680                | 48.234%    | 9.800% | 4.727%          |
| 2        | Long-Term Debt   | J-3       | 665,948,506                | 45.931%    | 4.028% | 1.850%          |
| 3        | Short-Term Debt  | J-2       | 84,600,060                 | 5.835%     | 1.710% | 0.100%          |
| 4        |  |           |                            |            |        |                 |
| 5        | Total Capital  |           | 1,449,897,246              | 100.000%   |        | 6.677%          |
| 6        |  |           |                            |            |        |                 |
| 7        |  |           |                            |            |        |                 |
| 8        | Accumulated Deferred Investment Tax Credit             |           |                            |            |        |                 |
| 9        | Account 255  | WPB-6     | 3,400,709                  |            |        |                 |
| 10       |  |           |                            |            |        |                 |
| 11       |  |           |                            |            |        |                 |
| 12       | <u>Investment Tax Credit Included in Total Capital</u> |           |                            |            |        |                 |
| 13       |  |           |                            |            |        |                 |
| 14       | Common Equity  |           | 700,988,978                | 48.234%    | 9.800% | 4.727%          |
| 15       | Long-Term Debt   |           | 667,510,486                | 45.931%    | 4.028% | 1.850%          |
| 16       | Short-Term Debt  |           | 84,798,491                 | 5.835%     | 1.710% | 0.100%          |
| 17       |  |           |                            |            |        |                 |
| 18       | Total Capital Including Investment Tax Credit          |           | 1,453,297,955              | 100.000%   |        | 6.677%          |

DUKE ENERGY KENTUCKY, INC.  
 CASE NO 2019-00271  
 EMBEDDED COST OF SHORT-TERM DEBT  
 THIRTEEN MONTH AVERAGE BALANCE ENDING MARCH 31, 2021  
 (CORPORATE)

DATA: BASE PERIOD "X" FORECASTED PERIOD  
 DATE OF CAPITAL STRUCTURE: END OF FORECASTED PERIOD  
 TYPE OF FILING: ORIGINAL "X" UPDATED REVISIED  
 WORK PAPER REFERENCE NO(S):

SCHEDULE J-2  
 PAGE 2 OF 2  
 WITNESS RESPONSIBLE:  
 C. M. JACOBI

| LINE NO. | ISSUE (A)  | AMOUNT OUTSTANDING (B) | INTEREST RATE (C) | CURRENT UNAMORT. (DISCOUNT) OR PREMIUM (D) | CURRENT UNAMORT. DEBT EXPENSE (E) | UNAMORT. LOSS ON REACQUIRED DEBT (G) | CARRYING VALUE (H=D+E-F-G) | INTEREST REQUIREMENT (I) |
|----------|--|------------------------|-------------------|--|-----------------------------------|--------------------------------------|----------------------------|--------------------------|
|          |  | (\$)                   | (%)               |  |                                   | (\$)                                 | (\$)                       | (\$)                     |
| 1        | <u>Sale of Accounts Receivable</u>                 |                        |                   |  |                                   |                                      |                            |                          |
| 2        | Amount Sold for Cash/Classified as Receivable      | 32,987,202             | 2.140%            | -  | -                                 | -                                    | 32,987,202                 | 705,964                  |
| 3        |  |                        |                   |  |                                   |                                      |                            |                          |
| 4        | <u>Notes Payable to Associated Companies</u>       |                        |                   |  |                                   |                                      |                            |                          |
| 5        | Notes Payable - Money Pool                         | 32,449,695             | 1.310%            | -  | -                                 | -                                    | 32,449,695                 | 425,024                  |
| 6        |  |                        |                   |  |                                   |                                      |                            |                          |
| 7        | <u>Current Unamortized Loss on Reacquired Debt</u> |                        |                   |  |                                   |                                      |                            |                          |
| 8        | 10.25 due June 2020                                |                        |                   |  |                                   | 755                                  | (755)                      | 755                      |
| 9        | 10.25 due November 2020                            |                        |                   |  |                                   | 7,624                                | (7,624)                    | 7,624                    |
| 10       |  |                        |                   |  |                                   |                                      |                            |                          |
| 11       | <u>Current Maturities</u>                          |                        |                   |  |                                   |                                      |                            |                          |
| 12       | Variable rate PCB due August 2027*                 | 19,230,769             | Variable          | -  | 59,227                            | -                                    | 19,171,542                 | 306,888                  |
| 13       |  |                        |                   |  |                                   |                                      |                            |                          |
| 14       | Totals   | 84,667,666             |                   | 0  | 59,227                            | 8,379                                | 84,600,060                 | 1,446,255                |
| 15       |  |                        |                   |  |                                   |                                      |                            |                          |
| 16       | Cost of Short-Term Debt                            |                        |                   |  |                                   |                                      |                            | 1.710%                   |

\*Note: The Variable rate PCB due August 2027 has a mandatory put to Duke Energy Kentucky in November 2021.  
 The balance will move to a current maturity on the balance sheet in November 2020 and remain a current maturity for 5 of the 13 months forecasted.

DUKE ENERGY KENTUCKY, INC.  
 CASE NO 2019-00271  
 EMBEDDED COST OF LONG-TERM DEBT  
 THIRTEEN MONTH AVERAGE BALANCE ENDING MARCH 31, 2021  
 (CORPORATE)

DATA: BASE PERIOD "X" FORECASTED PERIOD  
 DATE OF CAPITAL STRUCTURE: END OF FORECASTED PERIOD  
 TYPE OF FILING: ORIGINAL "X" UPDATED REVISED  
 WORK PAPER REFERENCE NO(S):

SCHEDULE J-3  
 PAGE 2 OF 2  
 WITNESS RESPONSIBLE:  
 C. M. JACOBI

| LINE NO. | DEBT ISSUE TYPE, COUPON RATE                                  | DATE ISSUED (DAY/MO/YR) (A) | MATURITY DATE (DAY/MO/YR) (B) | PRINCIPAL AMOUNT (C) | FACE AMOUNT OUTSTANDING (D) | UNAMORT. (DISCOUNT) OR PREMIUM (E) | UNAMORT. DEBT EXPENSE (F) | UNAMORT. LOSS ON REACQUIRED DEBT (G) | CARRYING VALUE (H=D+E-F-G) | ANNUAL INTEREST COST <sup>(1)</sup> (I)        |            |
|----------|---|-----------------------------|-------------------------------|----------------------|-----------------------------|------------------------------------|---------------------------|--------------------------------------|----------------------------|--|------------|
| 1        | <u>Unamortized Loss on Reacquired Debt</u>                    |                             |                               |                      |                             |                                    |                           |                                      |                            |  |            |
| 2        | 7.65% due 7/15/2025   |                             |                               |                      |                             |                                    |                           | 306,200                              | (306,200)                  | 63,938   |            |
| 3        | 5.5% due 1/1/2024   |                             |                               |                      |                             |                                    |                           | 125,625                              | (125,625)                  | 38,654   |            |
| 4        | 6.5% due 1/15/2022  |                             |                               |                      |                             |                                    |                           | 10,707                               | (10,707)                   | 4,563  |            |
| 5        | Variable rate PCB, due 8/1/2027                               |                             |                               |                      |                             |                                    |                           | 109,879                              | (109,879)                  | 15,569   |            |
| 6        |   |                             |                               |                      |                             |                                    |                           |                                      |                            |  |            |
| 7        | <u>Other Long Term Debt</u>                                   |                             |                               |                      |                             |                                    |                           |                                      |                            |  |            |
| 8        | LT Commercial Paper   | 1.490%                      | Series                        | 16-Mar-24            | 25,000,000                  | 25,000,000                         | -                         | -                                    | 25,000,000                 | 372,529  |            |
| 9        | Debentures  | 3.860%                      | Series                        | 26-Jul-06            | 26,720,000                  | 26,720,000                         | -                         | 136,114                              | 26,583,886                 | 1,051,311                                      |            |
| 10       | Debentures  | Variable                    | Series                        | 03-Dec-08            | 50,000,000                  | 50,000,000                         | -                         | 161,657                              | 49,838,343                 | 850,789  |            |
| 11       | Debentures  | 6.200%                      | Series                        | 10-Mar-06            | 65,000,000                  | 65,000,000                         | (189,366)                 | 336,402                              | 64,474,232                 | 4,064,049                                      |            |
| 12       | Debentures  | 3.420%                      | Series                        | 05-Jan-16            | 45,000,000                  | 45,000,000                         | -                         | 125,934                              | 44,874,066                 | 1,562,811                                      |            |
| 13       | Debentures  | 4.450%                      | Series                        | 05-Jan-16            | 50,000,000                  | 50,000,000                         | -                         | 224,209                              | 49,775,791                 | 2,233,866                                      |            |
| 14       | Debentures  | 3.350%                      | Series                        | 07-Sep-17            | 30,000,000                  | 30,000,000                         | -                         | 92,724                               | 29,907,276                 | 1,015,354                                      |            |
| 15       | Debentures  | 4.110%                      | Series                        | 07-Sep-17            | 30,000,000                  | 30,000,000                         | -                         | 111,760                              | 29,888,240                 | 1,237,146                                      |            |
| 16       | Debentures  | 4.260%                      | Series                        | 07-Sep-17            | 30,000,000                  | 30,000,000                         | -                         | 114,937                              | 29,885,063                 | 1,281,110                                      |            |
| 17       | Debentures  | 4.010%                      | Series                        | 03-Oct-18            | 25,000,000                  | 25,000,000                         | -                         | 67,332                               | 24,932,668                 | 1,024,657                                      |            |
| 18       | Debentures  | 4.180%                      | Series                        | 03-Oct-18            | 40,000,000                  | 40,000,000                         | -                         | 125,409                              | 39,874,591                 | 1,687,600                                      |            |
| 19       | Debentures  | 4.620%                      | Series                        | 12-Dec-18            | 35,000,000                  | 35,000,000                         | -                         | 133,020                              | 34,866,980                 | 1,621,716                                      |            |
| 20       | Debentures  | 4.320%                      | Series                        | 17-Jul-19            | 40,000,000                  | 40,000,000                         | -                         | 316,667                              | 39,683,333                 | 3,131,833                                      |            |
| 21       | Debentures  | 3.230%                      | Series                        | 26-Sep-19            | 95,000,000                  | 95,000,000                         | -                         | 270,000                              | 94,730,000                 | 2,700,000                                      |            |
| 22       | Debentures  | 3.560%                      | Series                        | 26-Sep-19            | 75,000,000                  | 75,000,000                         | -                         | 153,556                              | 74,846,444                 | 1,733,333                                      |            |
| 23       | Forecasted Debentures <sup>(2)</sup>                          | 3.256%                      | Series                        | 15-Sep-20            | 50,000,000                  | 26,923,077                         | -                         | 79,620                               | 26,843,457                 | 880,581  |            |
| 24       |   |                             |                               |                      |                             |                                    |                           |                                      |                            |  |            |
| 25       | MCF Fees  |                             |                               | 16-Mar-24            | -                           | -                                  | -                         | 304,877                              | (304,877)                  | 88,157   |            |
| 26       | LOC Fees  |                             |                               | 14-Feb-23            | -                           | -                                  | -                         | 27,034                               | (27,034)                   | 11,409   |            |
| 27       | Other fees (\$26.720M - remarketing, insurance, Bilateral LC) |                             |                               |                      |                             |                                    |                           |                                      |                            |  |            |
| 28       |   |                             |                               |                      |                             |                                    |                           |                                      |                            | 462,713  |            |
| 29       | <u>Current Maturities</u>                                     |                             |                               |                      |                             |                                    |                           |                                      |                            |  |            |
| 30       | Variable rate PCB due August 2027 <sup>(3)</sup>              | Variable                    | Series                        | 03-Dec-08            | 50,000,000                  | (19,230,769)                       | -                         | (59,227)                             | (19,171,542.00)            | (306,888)                                      |            |
| 31       |   |                             |                               |                      |                             |                                    |                           |                                      |                            |  |            |
| 32       |   |                             | Totals                        |                      | 761,720,000                 | 669,412,308                        | (189,366)                 | 2,722,025                            | 552,411                    | 665,948,506                                    | 26,826,800 |
| 33       |   |                             |                               |                      |                             |                                    |                           |                                      |                            |  |            |
| 34       |   |                             |                               |                      |                             |                                    |                           |                                      |                            |  |            |
| 35       |   |                             |                               |                      |                             |                                    |                           |                                      |                            | Embedded Cost of Long-Term Debt (I / H) 4.028% |            |

(1) Annualized interest cost plus (or minus) amortization of discount or premium plus amortization of issue costs minus (or plus) amortization of gain (or loss) on reacquired debt.  
 (2) The forecasted debenture is expected to be issued in September 2020 and would be outstanding for 7 of the 13 months forecasted.  
 (3) The Variable rate PCB due August 2027 has a mandatory put to Duke Energy Kentucky in November 2021. The balance will move to a current maturity on the balance sheet in

**Duke Energy Kentucky  
Case No. 2019-00271  
Staff's First Set Post-Hearing Data Requests  
Date Received: February 24, 2020**

**STAFF-POST-HEARING-DR-01-010**

**REQUEST:**

Provide copies of any correspondence in which Duke Kentucky or its affiliates have requested usage data from Electric Vehicle Charging Station providers and the response from those providers.

**RESPONSE:**

Email correspondence with Electric Vehicle Service Providers regarding EV charging station utilization was received in a period beyond the company's email record retention period and no longer exists.

**PERSON RESPONSIBLE:** Lang W. Reynolds

**Duke Energy Kentucky**  
**Case No. 2019-00271**  
**Staff's First Set Post-Hearing Data Requests**  
**Date Received: February 24, 2020**

**PUBLIC STAFF-POST-HEARING-DR-01-011**  
**(As to Attachment only)**

**REQUEST:**

Refer to the Direct Testimony of Ash Norton, page 5, in which she indicated that localized load growth on specific circuits has driven capital spending on transmission and distribution projects.

- a. Provide a list of all customers that are contributing to the localized load growth referred to by Ms. Norton, the dates on which each of those customers began receiving service or on which they are expected to begin receiving service, and the load or anticipated load of those customers.<sup>1</sup>
- b. For each such customer, identify and describe the circuits from which they receive or will receive service from Duke Kentucky; explain how each such circuit was or will be upgraded to serve that customer, explain why the upgrade was or is necessary; and identify the cost of each such upgrade (if a Certificate of Public Convenience and Necessity has been obtained or requested simply refer to and identify the case associated with the customer's load).
- c. For each such customer, state whether revenue associated with their increased load was included in the forecasted test period; identify the months of the test period for

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<sup>1</sup> For the purpose of responding to this request, Duke Kentucky may describe a single development, such as the Marydale Business Park, collectively.



which revenue from their load was included; and describe in detail how Duke Kentucky estimated the revenue from their load in the test period.

**RESPONSE:**

**CONFIDENTIAL PROPRIETARY TRADE SECRET (As to Attachment only)**

- a. In addition to the general growth associated with the nearly 10% increase in population of Boone County between 2010 and 2017 and the 38% increase in retail in Florence between 2012 and 2017, there has been localized growth related to commercial and industrial as well. This customer listing can be found in STAFF-POST-HEARING-DR-01-011 Confidential Attachment.
- b. This information can be found alongside the customer listing in STAFF-POST-HEARING-DR-01-011 Confidential Attachment.
- c. Duke Energy Kentucky only makes explicit adjustments for customers who are very large relative to the system because the economic data used to build the forecast are taken to be predictive of general demand. The Amazon facility, unique among the customers mentioned above, was judged to have a size so large as to justify such an adjustment. An annual energy estimate from the Company's Large Account Management group was divided into twelve equal monthly figures and added to the energy forecast for 2021, as well as each year the facility was expected to be in startup or service phase.

Forecasted load is categorized by revenue class (Residential, Commercial, Industrial, OPA and Street Lighting). Actual data from the twelve months ended May 31, 2019, was used to develop allocation factors for each revenue class to reclassify billing determinants by rate sheet. Therefore, any additional forecasted

load included in the Industrial revenue class was allocated mostly to Rates TT, DT, DS and DP, with smaller amounts being allocated to Rates EH, GSFL and UOLS, and priced out based on current or proposed rates.

The Company's forecasted test year only includes projections for revenue and expense expected during the test year. It would be inappropriate to recognize the benefit of expected load growth beyond the test year without also recognizing expenses, such as labor costs, that are also expected to increase beyond the test year.

**PERSON RESPONSIBLE:** Ash Norton – a., b.  
Jeff L. Kern – c.

**CONFIDENTIAL PROPRIETARY TRADE**

**SECRET**

**STAFF-POST-HEARING-DR-01-011**

**CONFIDENTIAL ATTACHMENT**

**FILED UNDER SEAL**

**Duke Energy Kentucky**  
**Case No. 2019-00271**  
**Staff's First Set Post-Hearing Data Requests**  
**Date Received: February 24, 2020**

**STAFF-POST-HEARING-DR-01-012**

**REQUEST:**

Refer to the application, Volume 1, Tab 22. Provide a breakdown of the projected capital spending shown for new load as compared to replacement of existing facilities in the ordinary course of business.

**RESPONSE:**

| <u>Capital Spend Category</u> | <u>2019</u>           | <u>2020</u>           | <u>2021</u>           |
|-------------------------------|-----------------------|-----------------------|-----------------------|
| Expansion/New Load            | 53,343,536            | 31,756,950            | 13,895,836            |
| New Generation & Storage      |                       | 25,378,888            | 94,452,775            |
| All Other                     | 98,234,432            | 76,749,503            | 56,362,490            |
|                               | <u>\$ 151,577,968</u> | <u>\$ 133,885,341</u> | <u>\$ 164,711,100</u> |

Please note that these dollars represent capital spending rather than capital placed in-service included in the forecasted test period. The forecasted amounts include certain projects no longer being contemplated by the Company in the years shown, specifically the “Woodsdale – New Generation” project on line 3 of Volume 1, Tab 22 and the “Solar Generation Facility” on line 6. These projects are included in “New Generation & Storage” in the table above. These two projects, no longer being contemplated by the Company in the years shown, were not forecast to be placed in-service during the test period in this case. Also note that these amounts exclude spend considered for inclusion in the company’s ESM rider.

**PERSON RESPONSIBLE:** Christopher M. Jacobi

**Duke Energy Kentucky**  
**Case No. 2019-00271**  
**Staff's First Set Post-Hearing Data Requests**  
**Date Received: February 24, 2020**

**STAFF-POST-HEARING-DR-01-013**

**REQUEST:**

- a. Provide the cost differential for placing new distribution facilities underground as compared to placing them overhead.
- b. Provide the cost differential for replacing existing overhead distribution facilities with underground facilities as compared to replacing them with overhead facilities.
- c. Identify the amounts spent in each of the last five calendar years to replace existing overhead facilities with underground facilities.
- d. Identify the number of miles of overhead facilities that were replaced with underground facilities in each of the last five calendar years.

**RESPONSE:**

As discussed by Company witness Ms. Norton in her direct testimony and as further explained during the evidentiary hearing, Duke Energy Kentucky's non-customer-requested undergrounding protocol is reactive-based whereby the Company evaluates its normal and ordinary overhead facility replacements/repairs with either overhead or underground facilities based upon a cost differential determined at the time and considering potential reliability improvements that could be gained. In situations where circuits already identified as needing repairs/replacements/upgrades and have known reliability issues, for example, due to fast growing vegetation, could benefit from undergrounding or the incremental cost of relocating the facilities underground are less or nominally more versus

simply replacing overhead, the Company may elect to move the facilities underground as part of the routine replacement/repairs. For new construction, the Company follows its underground tariffs on file with the Commission. Currently those rates are \$2.15 per foot for single family homes for all primary extensions. For Multi-Family Units, there is no charge except where there are extremely rocky conditions, in which case the charge is \$2.00 per linear trench foot.

- a. To review the estimated cost differential for placing new distribution facilities underground as compared to placing them overhead, three new residential customer projects that were originally designed for underground facilities were redesigned as overhead to obtain estimated overhead installation costs. The average estimated cost differential for these three projects were \$2.37 per front foot. A detailed study of cost differential for placing new distribution facilities underground as compared to placing them overhead will be done in support of future annual filings for 807 KAR 5:041, Section 21(5)(c). Please see STAFF-POST-HEARING-DR-01-013 Attachment 1.
- b. Because Duke Energy Kentucky's replacement of existing overhead facilities with underground facilities to date has been reactive or customer driven, a general cost differential has not been calculated. Rather, the Company performs such calculation at hoc based upon the unique circumstances of the specific area under consideration for relocation, whether by customer request or when the Company is evaluating to reconductor a circuit in need of maintenance with overhead or underground facilities. For the purposes of preparing this response, the Company has assumed a hypothetical project whereby existing overhead facilities that were not otherwise

in need of replacement were to be relocated underground. This hypothetical project estimated direct cost differential was calculated to be \$20.96 per foot. Please see STAFF-POST-HEARING-DR-01-013 Attachment 2.

- c. As indicated in STAFF-DR-02-021, Duke Energy Kentucky does not track the replacement of overhead facilities with underground facilities.
- d. As indicated in STAFF-DR-02-021, Duke Energy Kentucky does not track the replacement of overhead facilities with underground facilities.

**PERSON RESPONSIBLE:** Ash Norton

| Maximo Work Order | Job Name                   | # of Xfmrs | # Lots/Meters | Elec W.O. Cost (UG Estimate) | Phases | Front Footage | UG Cost per foot | OH Estimate  | OH Cost per foot | Cost per foot Difference |
|-------------------|----------------------------|------------|---------------|------------------------------|--------|---------------|------------------|--------------|------------------|--------------------------|
| 32449322          | North Walton Pointe Ph 4   | 2          | 11            | \$ 15,746.62                 | 1      | 796           | \$ 19.78         | \$ 17,940.85 | \$ 22.54         | \$ 2.76                  |
| 32873686          | Traemore Ph B              | 6          | 38            | \$ 80,397.00                 | 2      | 3070          | \$ 26.19         | \$ 58,658.71 | \$ 19.11         | \$ (7.08)                |
| 35325090          | Steeplechase Sec. 18 Ph. 1 | 3          | 16            | \$ 25,993.24                 | 2      | 1110          | \$ 23.42         | \$ 22,912.61 | \$ 20.64         | \$ (2.78)                |

**Average Cost Per food Difference \$ (2.37)**



|                          |                                   |           |              |
|--------------------------|-----------------------------------|-----------|--------------|
| UG Direct Cost           | \$ / linear conductor foot        | \$        | 49.98        |
| OH Direct Cost           | \$ / linear conductor foot        | \$        | 29.02        |
| <b>Cost Differential</b> | <b>\$ / linear conductor foot</b> | <b>\$</b> | <b>20.96</b> |

Site Name: EXAMPLE - 7101 Bridgetown Rd  
 Work Order #: 20000479  
 WO Description:  
 Construction Duration (mos): 0.47  
 UG Cost/mi \$ 360,006

Est Comp'd by: JCM  
 Date Est Comp'd: 3/5/2020

Manual Entry

\$ 49.98 Direct Cost per UG ft of linear conductor

|                             | Cost per unit                    | Units                       | Total               | Mhrs             | Duration (d) | Cost Description | Comments                                       |                                 |                              |
|-----------------------------|----------------------------------|-----------------------------|---------------------|------------------|--------------|------------------|--|---------------------------------|------------------------------|
| Phase 1.1                   | Enter OH primary miles           | 0.29                        |                     |                  |              |                  |  |                                 |                              |
|                             | Enter OH service count           | 1                           |                     |                  |              |                  |  |                                 |                              |
|                             | Limited access poles             | 4                           |                     |                  |              |                  | Rear lot poles w/ transformers                 |                                 |                              |
|                             | Field Assessment                 | 0.29                        |                     | 139              | 12           |                  | Sum of OH primary miles - all targets in phase |                                 |                              |
| INSTALL                     | Easements                        | \$ 1,425                    | \$ 1,425            | 30               | 2            | Other            |  |                                 |                              |
|                             | Contract Engineering             | \$ 20,000                   | \$ 5,800            | 261              | 15           | External Labor   | Cost per OH mile                               |                                 |                              |
|                             | Construction T&E (veg, locates)  | \$ 26,681                   | \$ 2,668            |                  |              |                  |  |                                 |                              |
|                             | Boring 2-4" diameter             | \$ 18.00                    | 955                 | \$ 17,190        | 191          | 5                | External Labor                                 | Bore for 2" conduit             |                              |
|                             | Boring 4-6" diameter             | \$ 21.00                    | 0                   | \$ -             | 0            | 0                | External Labor                                 | Bore for 4" conduit             |                              |
|                             | Boring 6-8" diameter             | \$ 34.00                    | 0                   | \$ -             | 0            | 0                | External Labor                                 | Bore for up to 3-2" conduits    |                              |
|                             | Rock Adders                      | \$ 24.65                    | 48                  | \$ 1,177         |              |                  | External Labor                                 | 5% of bore length               |                              |
|                             | Pull Conduit up to 2"            | \$ 1.73                     | 955                 | \$ 1,652         |              |                  | External Labor                                 | Pulling one 2" conduit          |                              |
|                             | Pull Conduit up to 2" (multiple) | \$ 1.73                     | 0                   | \$ -             |              |                  | External Labor                                 | Pulling >1 conduit 2"           |                              |
|                             | Pull Cable 1-2"                  | \$ 1.00                     | 955                 | \$ 955           | 127          | 3                | External Labor                                 |                                 |                              |
|                             | Install pedestals                | \$ 130                      | 0                   | \$ -             |              |                  | External Labor                                 |                                 |                              |
|                             | Install box pads                 | \$ 103                      | 1                   | \$ 103           |              |                  | External Labor                                 |                                 |                              |
|                             | Install transformers             | \$ 223                      | 1                   | \$ 223           |              |                  | External Labor                                 |                                 |                              |
|                             | Convert meterbases               | \$ 750                      | 1                   | \$ 750           |              |                  | External Labor                                 |                                 |                              |
|                             | Miscellaneous Units              | 10.0%                       | \$ 21,301           | \$ 2,130         |              |                  | External Labor                                 | 10% of UG install labor cost    |                              |
|                             | Overhead Const.                  | \$ 5,000                    | 0.5                 | \$ 2,500         |              |                  | External Labor                                 | Per pole                        |                              |
|                             | Traffic Flagging                 | \$ 1,250                    | 0                   | \$ -             |              |                  | External Labor                                 | Unit cost is 2 man crew per day |                              |
|                             | Restoration                      | \$ 260                      | 19                  | \$ 4,966         | 19           | 2                | External Labor                                 | Units = 2% of bore length       |                              |
|                             | MATERIALS                        | Other materials             | \$ 3,237            | 15%              | \$ 486       |                  |  | Materials                       |                              |
|                             |                                  | 75 kVA padmount transformer | \$ 1,695            | 0                | \$ -         |                  |  | Materials                       |                              |
| 50 kVA padmount transformer |                                  | \$ 1,262                    | 0                   | \$ -             |              |                  | Materials                                      |                                 |                              |
| 25 kVA padmount transformer |                                  | \$ 1,050                    | 1                   | \$ 1,050         |              |                  | Materials                                      |                                 |                              |
| 1/0 AL cable                |                                  | \$ 1.67                     | 855                 | \$ 1,428         |              |                  | Materials                                      |                                 |                              |
| 4/0 AL triplex cable        |                                  | \$ 1.33                     | 100                 | \$ 133           |              |                  | Materials                                      |                                 |                              |
| 500 MCM                     |                                  | \$ 3.34                     | 0                   | \$ -             |              |                  | Materials                                      |                                 |                              |
| 2" HPDE coilable conduit    |                                  | \$ 0.54                     | 955                 | \$ 516           |              |                  | Materials                                      |                                 |                              |
| 4" HPDE coilable conduit    |                                  | \$ 2.19                     | 0                   | \$ -             |              |                  | Materials                                      |                                 |                              |
| 45ft class 4 pole           |                                  | \$ 236                      | 0                   | \$ -             |              |                  | Materials                                      |                                 |                              |
| Method 1 meter conv         |                                  | \$ 21.84                    | 0                   | \$ -             |              |                  | Materials                                      |                                 |                              |
| Method 3 meter conv         |                                  | \$ 110.70                   | 1                   | \$ 111           |              |                  | Materials                                      |                                 |                              |
| REMOVAL                     |                                  | Remove OH Primary/Sec       | \$ 2.25             | 0                | \$ -         | 0                | 0  | External Labor                  | Includes primary and neutral |
|                             |                                  | Remove OH Services          | \$ 200              | 0                | \$ -         |                  |  | External Labor                  | Per service                  |
|                             | Limited Access Adder             | \$ 537                      | 4                   | \$ 2,147         |              |                  | External Labor                                 |                                 |                              |
|                             | Remove OH Xtrs                   | \$ 281                      | 0                   | \$ -             |              |                  | External Labor                                 |                                 |                              |
|                             | Miscellaneous Units              | 15%                         | \$ 2,147            | \$ 322           |              |                  | External Labor                                 | 15% of OH removal labor cost    |                              |
|                             |                                  |                             | <b>Direct Cost</b>  | <b>\$ 47,731</b> |              |                  |  |                                 |                              |
|                             |                                  |                             | <b>Fully Loaded</b> | <b>\$ 65,115</b> |              |                  |  |                                 |                              |
|                             |                                  |                             | <b>CapEx</b>        | <b>\$ 60,874</b> |              |                  |  |                                 |                              |

| Assumptions |                            |
|-------------|----------------------------|
| 8           | Hours/Day                  |
| 40          | Boring Crew Mhrs/Day       |
| 200         | Boring Ft/Day              |
| 40          | Termination Crew Mhrs/Day  |
| 300         | Terminations Ft/Day        |
| 0.02        | Design (Miles/Day OH Prim) |
| 0.75        | Design Productivity Factor |
| 0.57        | Installation Mileage       |
| 0.60        | RoW Easement/Day           |
| 0.75        | RoW Productivity Factor    |
| 4           | OH Removal Crew Size       |
| 800         | OH Removal Mhrs/Mile       |
| 0.5         | FA Productivity Factor     |
| 0.025       | FA OH miles/day            |

| GS estimating Adjustments |             | All in       | Less Removals    |
|---------------------------|-------------|--------------|------------------|
| Material adder delta      | 16.5%       | 16.5%        | \$ 614           |
| Pool delta                | 24.66%      | 24.7%        | \$ 11,771        |
| AFUDC                     | 0.67% month | 0.5%         | \$ 226           |
| Additional findings       |             | 10.0%        | \$ 4,773         |
| <b>% of spend</b>         |             | <b>26.7%</b> | <b>\$ 17,383</b> |



Site Name: EXAMPLE - 7101 Bridgetown Rd  
 Work Order #: 20000479  
 WO Description:  
 Construction Duration (mos): 0.05  
 UG Cost/mi

Est Comp'd by: JCM  
 Date Est Comp'd: 3/5/2020

Manual Entry

**\$ 29.02 Direct Cost per OH ft of linear conductor**

|                          |                                 | Cost per unit | Units    | Total               | Mhrs | Duration (d) | Cost Description | Comments                                       |
|--------------------------|---------------------------------|---------------|----------|---------------------|------|--------------|------------------|--|
| Phase 2.1                | Enter OH primary miles          |               | 0.29     |                     |      |              |                  |  |
|                          | Enter OH service count          |               | 1        |                     |      |              |                  |  |
|                          | Limited access poles            |               | 4        |                     |      |              |                  | Rear lot poles w/ transformers                 |
|                          | Field Assessment                |               | 0.29     |                     | 139  | 12           |                  | Sum of OH primary miles - all targets in phase |
| INSTALL                  | Easements                       | \$ 1,425      | 1        | \$ 1,425            | 30   | 2            | Other            |  |
|                          | Contract Engineering            | \$ 20,000     | 0.29     | \$ 5,800            | 261  | 15           | External Labor   | Cost per OH mile                               |
|                          | Construction T&E (veg, locates) | \$ 11,027     | 20%      | \$ 2,205            |      |              |                  |  |
|                          | Boring 2-4" diameter            | \$ 18.00      |          | \$ -                | 0    | 0            | External Labor   |  |
|                          | Boring 4-6" diameter            | \$ 21.00      |          | \$ -                | 0    | 0            | External Labor   |  |
|                          | Boring 6-8" diameter            | \$ 34.00      |          | \$ -                | 0    | 0            | External Labor   |  |
|                          | Rock Adders                     | \$ 24.65      | 0        | \$ -                |      |              | External Labor   |  |
|                          | Install OH primary/neutral      | \$ 1.96       | 1710     | \$ 3,352            |      |              | External Labor   | Install primary conductor and neutral          |
|                          | Install OH service              | \$ 1.96       | 100      | \$ 196              |      |              | External Labor   |  |
|                          | Pull Cable 1-2"                 | \$ 1.00       | 100      | \$ 100              | 13   | 0            | External Labor   |  |
|                          | Install pole 40-45ft            | \$ 522        | 5        | \$ 2,610            |      |              | External Labor   | New pole sets                                  |
|                          | Install box pads                | \$ 103        | 0        | \$ -                |      |              | External Labor   |  |
|                          | Install transformers            | \$ 223        | 1        | \$ 223              |      |              | External Labor   |  |
|                          | Convert meterbases              | \$ 750        | 1        | \$ 750              |      |              | External Labor   |  |
|                          | Miscellaneous Units             | 20.0%         | \$ 6,481 | \$ 1,296            |      |              | External Labor   |  |
|                          | Overhead Const.                 | \$ 2,500      | 1        | \$ 2,500            |      |              | External Labor   | Per pole cost for installing risers            |
|                          | Traffic Flagging                | \$ 1,250      | 0        | \$ -                |      |              | External Labor   |  |
|                          | Restoration                     | \$ 260        | 6        | \$ 1,560            | 6    | 1            | External Labor   | Restoration crew of 6 hours                    |
|                          | Other materials                 | \$ 4,560      | 25%      | \$ 1,140            |      |              | Materials        |  |
|                          | 75 kVA padmount transformer     | \$ 1,695      |          | \$ -                |      |              | Materials        |  |
|                          | 50 kVA padmount transformer     | \$ 1,262      |          | \$ -                |      |              | Materials        |  |
|                          | 25 kVA padmount transformer     | \$ 1,050      | 1        | \$ 1,050            |      |              | Materials        |  |
|                          | 1/0 AL cable                    | \$ 1.67       | 855      | \$ 1,428            |      |              | Materials        |  |
| 4/0 AL triplex cable     | \$ 1.33                         | 100           | \$ 133   |                     |      | Materials    |                  |  |
| Neutral                  | \$ 0.90                         | 855           | \$ 770   |                     |      | Materials    |                  |  |
| 2" HPDE coilable conduit | \$ 0.54                         |               | \$ -     |                     |      | Materials    |                  |  |
| 4" HPDE coilable conduit | \$ 2.19                         |               | \$ -     |                     |      | Materials    |                  |  |
| 45ft class 4 pole        | \$ 236                          | 5             | \$ 1,180 |                     |      | Materials    |                  |  |
| Method 1 meter conv      | \$ 21.84                        |               | \$ -     |                     |      | Materials    |                  |  |
| Method 3 meter conv      | \$ 110.70                       |               | \$ -     |                     |      | Materials    |                  |  |
| REMOVAL                  | Remove OH Primary/Sec           | \$ 2.25       |          | \$ -                | 0    | 0            | External Labor   | Includes primary and neutral                   |
|                          | Remove OH Services              | \$ 200        |          | \$ -                |      |              | External Labor   | Per service                                    |
|                          | Limited Access Adder            | \$ 537        |          | \$ -                |      |              | External Labor   |  |
|                          | Remove OH Xtrs                  | \$ 281        |          | \$ -                |      |              | External Labor   |  |
|                          | Miscellaneous Units             | 15%           | \$ -     | \$ -                |      |              | External Labor   | 15% of OH removal labor cost                   |
|                          |                                 |               |          | <b>Direct Cost</b>  |      |              | <b>\$ 27,718</b> |  |
|                          |                                 |               |          | <b>Fully Loaded</b> |      |              | <b>\$ 38,279</b> |  |
|                          |                                 |               |          | <b>CapEx</b>        |      |              | <b>\$ 37,725</b> |  |

| Assumptions |                            |
|-------------|----------------------------|
| 8           | Hours/Day                  |
| 40          | Boring Crew Mhrs/Day       |
| 200         | Boring Ft/Day              |
| 40          | Termination Crew Mhrs/Day  |
| 300         | Terminations Ft/Day        |
| 0.02        | Design (Miles/Day OH Prim) |
| 0.75        | Design Productivity Factor |
| 0.57        | Installation Mileage       |
| 0.60        | RoW Easement/Day           |
| 0.75        | RoW Productivity Factor    |
| 4           | OH Removal Crew Size       |
| 800         | OH Removal Mhrs/Mile       |
| 0.5         | FA Productivity Factor     |
| 0.025       | FA OH miles/day            |

| GS estimating Adjustments |                   |              | All in           | Less Removals    |
|---------------------------|-------------------|--------------|------------------|------------------|
| Material adder delta      | 16.5%             | 16.5%        | \$ 941           | \$ 941           |
| Pool delta                | 24.66%            | 24.7%        | \$ 6,835         | \$ 6,835         |
| AFUDC                     | 0.67% month       | 0.0%         | \$ 14            | \$ 14            |
| Additional findings       |                   | 10.0%        | \$ 2,772         | \$ 2,772         |
|                           | <b>% of spend</b> | <b>27.6%</b> | <b>\$ 10,561</b> | <b>\$ 10,561</b> |

**Duke Energy Kentucky**  
**Case No. 2019-00271**  
**Staff's First Set Post-Hearing Data Requests**  
**Date Received: February 24, 2020**

**STAFF-POST-HEARING-DR-01-014**

**REQUEST:**

State whether Cinergy Receivables, LLC imposes a finance charge for collection of account receivables for Duke Kentucky. If so, identify the finance charge rate that is imposed.

**RESPONSE:**

Yes, Cinergy Receivables, LLC imposes a finance charge for collection of accounts receivables for Duke Energy Kentucky. Because the sale of receivables has historically been treated as short-term debt in setting rates for Duke Energy Kentucky, the average balance of the receivables sold to Cinergy Receivables is reflected in the Company's capital structure on Schedule J-1. As shown on Schedule J-2, page 2 of 2, the thirteen-month average financing cost for the receivables included in the Company's capital structure is 2.384 percent. The Cinergy Receivables program is an important part of the Company's capital structure, as it offers a diversified and low-cost financing option. Absent the Cinergy Receivables program, the Company would have had to access the capital markets and issue long-term debt to account for this portion of the capital structure.

**PERSON RESPONSIBLE:** Christopher M. Jacobi

**Duke Energy Kentucky**  
**Case No. 2019-00271**  
**Staff's First Set Post-Hearing Data Requests**  
**Date Received: February 24, 2020**

**STAFF-POST-HEARING-DR-01-015**

**REQUEST:**

Refer to the Setser Rebuttal Testimony, page 4, lines 10-12, addressing the Attorney General's witness, Mr. Lane Kollen's recommendation for a downward adjustment related to the cost of capital of Duke Energy Business Service (DEBS) and stating that no adjustment is necessary because, among other things, "no return component related to DEBS was actually included in the test year revenue requirement." State whether the \$914,966 inadvertently excluded from Account 931008 in the test period is the return on DEBS assets. If not, state what was included in that amount.

**RESPONSE:**

The \$914,966 inadvertently excluded from Account 931008 in the test period is the return on DEBS assets. See also page 26, Line 1 of Ms. Lawler's rebuttal testimony. There is no need to make Mr. Kollen's recommended adjustment to remove the \$914,966 because those costs were not included in the Company's revenue requirement to begin with. Mr. Kollen's recommendation to remove costs that are not even reflected in the Company's revenue requirement is unsupported, punitive, and unreasonable.

**PERSON RESPONSIBLE:** Sarah E. Lawler

**Duke Energy Kentucky**  
**Case No. 2019-00271**  
**Staff's First Set Post-Hearing Data Requests**  
**Date Received: February 24, 2020**

**STAFF-POST-HEARING-DR-01-016**

**REQUEST:**

Refer to Duke Kentucky's to AG-1-50(c), Attachment. The cost of capital used to calculate Duke Kentucky's return portion of Property Plant and Equipment, Prepaid Pension Assets, and Inventory was 8.46 percent, which differs from the cost of capital that Duke Kentucky proposed in this proceeding. Explain how the cost of capital component is set for the return on the DEBS plant that is allocated to Duke Kentucky and explain why the 8.46 percent cost of capital differs from that proposed in the rate case.

**RESPONSE:**

The 8.46 percent cost of capital is the pre-tax cost of capital approved in the Company's most recent electric base rate case, Case No 2017-00321. See AG-DR-01-050(c) Attachment for a calculation of the 8.46 percent. DEBS assets, like assets of the utility, are capital investments made by shareholders that are necessary to provide service to customers. Duke Energy Kentucky is only allocated a fair portion of the costs of the DEBS assets that it would otherwise have to make on its own absent the DEBS service company structure.

**PERSON RESPONSIBLE:** Sarah E. Lawler

**Duke Energy Kentucky**  
**Case No. 2019-00271**  
**Staff's First Set Post-Hearing Data Requests**  
**Date Received: February 24, 2020**

**STAFF-POST-HEARING-DR-01-017**

**REQUEST:**

Refer to the Setser Rebuttal Testimony, pages 5 and 6, which discusses how DEBS income tax expense is recovered from Duke Kentucky. Explain whether the Property Plant and Equipment that Duke Energy allocates to Duke Kentucky for cost of capital recovery includes the accumulated deferred income tax assets or liabilities related to temporary differences for that property. If not, confirm that DEBS collects tax expense through the equity component of the cost of capital at the statutory tax rate, without regard for the deferred taxes balance.

**RESPONSE:**

The Property Plant Equipment is reduced by the accumulated deferred taxes and the equity return is grossed up for taxes to arrive at a pre-tax amount. The calculation results in a monthly journal entry that creates current taxable income on DEBS and a current deductible expense on Kentucky.

Notwithstanding this description of the Company's actual accounting, please refer to the Company's response to STAFF-POST-HEARING-DR-01-015 indicating that none of the return component (including equity return or the amount grossed up for income) was actually included in the test year revenue requirement.

**PERSON RESPONSIBLE:** Jeff Setser



**Duke Energy Kentucky**  
**Case No. 2019-00271**  
**Staff's First Set Post-Hearing Data Requests**  
**Date Received: February 24, 2020**

**STAFF-POST-HEARING-DR-01-018**

**REQUEST:**

Provide where in the filed COSS the rates found in Rate RTP are supported.

**RESPONSE:**

The proposed delivery charges for Rate RTP were calculated using the allocated amounts for Transmission and Distribution Demand from the COSS. The Transmission data can be found on FR-16(7)(v)-7, Page 1 of 18, Row 20 and the Distribution data can be found on FR-16(7)(v)-11, Page 1 of 18, Row 20. These amounts were divided by the respective kwh as found in Schedule M-2.2. Please see tables below:

**Secondary Voltage**

|   | <u>Source</u>                  | <u>Rate DS</u> | <u>Rate DT<br/>Secondary</u> | <u>Total</u>      |
|---|--------------------------------|----------------|------------------------------|-------------------|
| Transmission  | FR-16(7)(v)-7, Page 1, Row 20  | 8,982,546      | 4,478,682                    | 13,461,228        |
| Distribution  | FR-16(7)(v)-11, Page 1, Row 20 | 12,984,034     | 6,512,637                    | 19,496,671        |
| <b>Total Secondary Voltage</b>                                  |                                |                |                              | <b>32,957,899</b> |
| kWh Sales for Rates DS, DS-RTP, DT-Secondary & DT-RTP-Secondary |                                |                |                              | 1,792,028,495     |
| <b>Proposed Delivery Charge for Secondary Voltage:</b>          |                                |                |                              | <b>\$0.018391</b> |

**Primary Voltage**

|  | <u>Source</u>                  | <u>Rate DP</u> | <u>Rate DT<br/>Primary</u> | <u>Total</u>      |
|--|--------------------------------|----------------|----------------------------|-------------------|
| Transmission   | FR-16(7)(v)-7, Page 1, Row 20  | 143,048        | 2,960,880                  | 3,103,928         |
| Distribution   | FR-16(7)(v)-11, Page 1, Row 20 | 220,284        | 4,260,205                  | 4,480,489         |
| <b>Total Primary Voltage</b>                         |                                |                |                            | <b>7,584,417</b>  |
| kWh Sales for Rates DP & DT-Primary                  |                                |                |                            | 499,498,630       |
| <b>Proposed Delivery Charge for Primary Voltage:</b> |                                |                |                            | <b>\$0.015184</b> |



**Transmission Voltage**

|   | <u>Source</u>                  | <u>Rate TT</u>    |
|---|--------------------------------|-------------------|
| Transmission  | FR-16(7)(v)-7, Page 1, Row 20  | 1,402,934         |
| Distribution  | FR-16(7)(v)-11, Page 1, Row 20 | <u>205,951</u>    |
| <b>Total Transmission Voltage</b>                         |                                | <b>1,608,885</b>  |
| kWh Sales for Rates TT & TT-RTP                           |                                | 243,698,641       |
| <b>Proposed Delivery Charge for Transmission Voltage:</b> |                                | <b>\$0.006602</b> |

**PERSON RESPONSIBLE:** Jeff L. Kern

**Duke Energy Kentucky**  
**Case No. 2019-00271**  
**Staff's First Set Post-Hearing Data Requests**  
**Date Received: February 24, 2020**

**STAFF-POST-HEARING-DR-01-019**

**REQUEST:**

Provide the additional language that Duke Kentucky would include in its tariff for the Usage Alert, Outage Alert, and Pick Your Own Due Date programs if directed to do so by the Commission.

**RESPONSE:**

If the Commission directs the Company to include details of the programs, the Company would revise Section 4 of Sheet No. 24 to read as follows:

**Optional Monitoring Programs for Customers.**

Company will offer, as available, optional alert programs for customer participation. These programs are described below.

1. Usage Alerts provide enrolled customers with a mid-cycle report of their usage to date, along with projections of the end-of-cycle bill, based on historical usage and weather data. Customers will also have the opportunity to elect to receive threshold-based reports.

Eligibility: All active residential and non-residential customers with an AMI-MDM certified meter, a registered email address and not signed-up for budget billing are automatically enrolled in Usage Alerts;

Program Details:

- a. Customers will receive an alert halfway through their billing cycle each month with their estimated electricity usage to date and projected amount for the rest of the month.
  - b. The mid-cycle alert will include estimated usage breakdown by appliance.
  - c. Customers can also set up Budget Alerts that will notify the customer if projected costs are expected to hit a certain threshold amount set by the customer
  - d. Customers can change preferences by selecting the “Manage My Usage Alerts” button within each email or text, allowing the customer to include an additional email address or cell phone number.
  - e. Customers will be automatically removed from Usage Alerts if they no longer have an active smart meter at their current location and/or they participate in another program that conflicts with Usage Alerts.
  - f. Customers should contact the Company for further details.
2. Outage Alerts provide enrolled customers with enhanced restoration information regarding their service when the customer has an outage. Company will be able to communicate with enrolled customers to make them more aware of the outage, the cause, the estimated time of restoration as well as changes to the estimated time of restoration during the outage, and notification of restoration.

Eligibility: All active residential and non-residential customers with either an email or mobile phone number are automatically enrolled in Outage Alerts. Customers with an assigned account manager can self-enroll for Outage alerts.

Program Details;

- a. Customers will be notified by text, email or voice message when they have an outage
  - b. Momentary outages of a few seconds will not trigger an outage notification
  - c. Notifications will include estimated time of restoration, cause of the outage and status of the crews working to restore power.
  - d. An alert will be sent to notify the customer once power is restored
  - e. Customers should contact the Company for further details
3. High Bill Alerts provide enrolled customers with a mid-cycle report when their bill is projected to be 30 percent and \$30 higher than the previous month.

Eligibility: All active residential customers with a non-AMI meter, a minimum of 12 months history, a registered email address, and not signed-up for budget billing are automatically enrolled in High Bill Alerts. Customers will be transitioned from High Bill Alerts to the Usage Alerts program once they receive an AMI meter and it becomes certified. Customers will only be enrolled in either Usage Alerts or High Bill Alerts, not both.

Program Details:

- a. Alerts will be sent when a customer's bill is projected to be 30% and \$30 higher than the previous month based on weather and 12 months of historical usage.
- b. Alerts are sent halfway through the customer's normal billing cycle.
- c. A Continued High-Usage Message will be sent after the customer received a High Bill Alert the month before and, due to weather, their kWh usage of the current month trending higher by 5%.

- d. Customers should contact the Company for further details

In addition, the Company would revise Section 9 of Sheet No. 25 regarding the Pick Your Due Date Program as follows. Please note that the actual name of the program is “Pick Your Due Date” rather than “Pick Your Own Due Date” so the Company proposes to change the name regardless of whether the Commission directs the Company to include the details of the program.

**Pick Your Due Date**

Pick Your Due Date lets a customer choose what day their bill is due each month. This change in the due date may result in one billing period with a longer or shorter cycle, which could affect the amount of the first bill the customer receives.

Eligibility: All active, eligible residential and non-residential accounts with an AMI-MDM certified meter will be able to request enrollment and select their preferred due date. Account status must be Active or Pending with no active installment plan or regulated charges more than 23 days past due. Consolidated billing accounts are not eligible for this program.

**Program Details:**

- a) Customers who enroll in the program can pick their monthly due date
- b) Due dates can be changed once per year
- c) If the due date falls on a holiday or weekend, the payment will be due the next business day.
- d) Customers should contact the Company for additional details or to enroll

**PERSON RESPONSIBLE:** Jeff L. Kern

**Duke Energy Kentucky**  
**Case No. 2019-00271**  
**Staff's First Set Post-Hearing Data Requests**  
**Date Received: February 24, 2020**

**STAFF-POST-HEARING-DR-01-020**

**REQUEST:**

Refer to the Application, Volume 12, Schedule L-1, page 126 of 172, paragraph C. Duke Kentucky is proposing to add language under its Charge for Reconnection of Service tariff sheet. The last sentence of paragraph C states: "At the Company's discretion particularly dangerous or repeated instances of tampering may result in the customer being required to take service under Rider AMO and being subject to the charges associated with that rider."

- a. State how residential customers will be notified that they will be placed under Rider AMO under this proposal.
- b. State whether, and if so how, residential customers that are placed under Rider AMO under this proposal will have a way to transition off of Rider AMO.

**RESPONSE:**

- a. When a customer calls Duke Energy Kentucky to discuss their disconnection and/or tamper charges, they will then be notified if they are being required to take service under Rider AMO and being subject to the charges associated with that rider.
- b. Customers who have been placed on Rider AMO due to dangerous or repeated instances of tampering will remain on the program for 12 months. If there have been no additional instances of tampering, the customer can be removed from the Rider upon their request.

**PERSON RESPONSIBLE:** Jeff L. Kern

**Duke Energy Kentucky**  
**Case No. 2019-00271**  
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**Date Received: February 24, 2020**

**STAFF-POST-HEARING-DR-01-021**

**REQUEST:**

Explain whether Duke Kentucky monitors its system's frequency regulation independently of PJM Interconnection, LLC.

**RESPONSE:**

Yes. The frequency of the Eastern Interconnection is displayed on a screen at the Midwest Generation Dispatcher desk as well as displayed on the front "data wall" of the Duke Energy Trading Floor.

**PERSON RESPONSIBLE:** John Swez

**Duke Energy Kentucky**  
**Case No. 2019-00271**  
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**Date Received: February 24, 2020**

**STAFF-POST-HEARING-DR-01-022**

**REQUEST:**

Provide the date that Duke Kentucky first contracted to sell its receivables to Cinergy Receivables, LLC.

**RESPONSE:**

Duke Energy Kentucky first contracted to sell its receivables to Cinergy Receivables, LLC, in March 2002. Prior to that, The Cincinnati Gas & Electric Company, Inc. (n/k/a Duke Energy Ohio, Inc.), PSI Energy, Inc. (n/k/a Duke Energy Indiana, LLC), and The Union Light, Heat and Power Company (n/k/a Duke Energy Kentucky, Inc.) sold their receivables, on a revolving basis, to an unrelated third party per an agreement entered into beginning in January 1996.

**PERSON RESPONSIBLE:** Danielle L. Weatherston



**Duke Energy Kentucky**  
**Case No. 2019-00271**  
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**Date Received: February 24, 2020**

**STAFF-POST-HEARING-DR-01-023**

**REQUEST:**

Refer to Duke Kentucky's response to Commission Staff's Third Request for Information, Item 5(b), regarding Rate LED customers who elect to pay the cost of any additional facility investment on a monthly basis rather than an up-front payment.

- a. Identify the additional facility investment components and provide the useful life for each component.
- b. Explain how Duke Kentucky will ensure that Rate LED customers who elect to pay the cost of any additional facility investment on a monthly basis will not be overcharged beyond the actual cost of such an investment.

**RESPONSE:**

- a. These facilities are additional distribution facilities required to provide electric service to the lighting system such as single-phase pad-mount transformers, non-standard concrete foundations required due to terrain constraints, vaults or junction boxes in urban areas or other equipment not typically used in lighting systems but required to serve in a specific situation. Customers must be adjacent to an electric power line that is adequate and suitable for supplying the necessary electric service. When they are not, additional facilities may be required. The monthly rate was calculated using the same Levelized Fixed Charge Rate formula that was used to

set the rates for the proposed new equipment that are listed in the tariff, using a 15-year useful life.

- b. These additional facilities will be owned, maintained, repaired and/or replaced by Duke Energy Kentucky in the same manner as any other similar distribution facilities. The monthly payment option is not intended as a way for the customer to purchase the additional facilities on an installment plan. Duke Energy Kentucky will continue to own and maintain the additional facilities and pay property taxes on it throughout its useful life.

**PERSON RESPONSIBLE:** Jeff L. Kern

**Duke Energy Kentucky**  
**Case No. 2019-00271**  
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**Date Received: February 24, 2020**

**STAFF-POST-HEARING-DR-01-024**

**REQUEST:**

Indicate whether Duke Kentucky has been annually filing with the Commission supporting data used to determine the estimated average cost differential between providing underground facilities and providing overhead facilities as required by 807 KAR 5:041, Section 21(5)(c). If so, indicate when the last five filings have been made. If not, explain why not.

**RESPONSE:**

The Company's underground policy, including the cost per foot is set forth in the Company's underground tariffs as filed with the Commission. The Company has not proposed changes to that rate:

- Rate UDP-R, Residential Underground Distribution Policy, K.Y.P.S.C. Electric No. 2, Sheet 96
- Rate UDP-G, General Underground Distribution Policy, K.Y.P.S.C. Electric No. 2, Sheet 97

A description of the review of the estimated cost differential for placing new distribution facilities underground as compared to placing them overhead is described in STAFF-POST-HEARING-DR-01-013(a). The Company has examined its records and cannot locate when the last time the supporting data was last provided.

Further, there have been no changes to Duke Energy Kentucky's calculation of its tariffed rate, so the Company did not file annual updates as required by the regulation. The Company will henceforth file annual updates even if the calculation does not change.

**PERSON RESPONSIBLE:** Ash Norton

**Duke Energy Kentucky**  
**Case No. 2019-00271**  
**Staff's First Set Post-Hearing Data Requests**  
**Date Received: February 24, 2020**

**STAFF-POST-HEARING-DR-01-025**

**REQUEST:**

Given that Duke Kentucky estimated the rate at which excess protected accumulated deferred income taxes (ADIT) may be amortized to reduce rates in the forecasted test period by using the historical 2018 average rate assumption method (ARAM) rate and has been unable or unwilling to calculate the actual ARAM rate for the forecasted test period, explain whether Duke Kentucky contends that it would be unreasonable or would violate federal normalization rules for the Commission to calculate Duke's revenue requirement in the forecasted test period using the amortization rates for protected and unprotected excess ADIT proposed Duke Kentucky while requiring Duke Kentucky to account for the total amount amortized (i.e., the sum of the protected and unprotected excess ADIT amortized during the forecasted test period) by first attributing it to the amortization of excess protected ADIT to the extent permitted by ARAM in each year, calculated when Duke Kentucky has the information to do so for each year, and attributing the remainder to excess unprotected ADIT until new base rates are established in a subsequent base rate case.

**RESPONSE:**

It would violate federal normalization rules for the Commission to true-up estimated ARAM amortization with actual ARAM amortization and not make a corresponding true-

up for book depreciation, tax expense, and accumulated deferred income taxes. This can be described as the 'consistency principle' from IRC Sec. 168(i)(9)(B).

**PERSON RESPONSIBLE:** John Panizza

**Duke Energy Kentucky**  
**Case No. 2019-00271**  
**Staff's First Set Post-Hearing Data Requests**  
**Date Received: February 24, 2020**

**STAFF-POST-HEARING-DR-01-026**

**REQUEST:**

Provide a monthly breakdown of 2019 payroll expenses segregated by union and non-union.

**RESPONSE:**

See STAFF-POST-HEARING-DR-01-026 Attachment.

**PERSON RESPONSIBLE:** Danielle L. Weatherston

| <b>2019 DEK Actual Labor</b> | <b>Jan 19</b>       | <b>Feb 19</b>       | <b>Mar 19</b>       | <b>Apr 19</b>       | <b>May 19</b>       | <b>Jun 19</b>       | <b>Jul 19</b>       | <b>Aug 19</b>       | <b>Sep 19</b>       | <b>Oct 19</b>       | <b>Nov 19</b>       | <b>Dec 19</b>       | <b>Total</b>         |
|------------------------------|---------------------|---------------------|---------------------|---------------------|---------------------|---------------------|---------------------|---------------------|---------------------|---------------------|---------------------|---------------------|----------------------|
| Union                        | \$ 764,539          | \$ 693,632          | \$ 1,068,815        | \$ 817,404          | \$ 742,002          | \$ 774,823          | \$ 753,414          | \$ 1,125,099        | \$ 728,434          | \$ 675,180          | \$ 681,197          | \$ 748,609          | \$ 9,573,148         |
| Non-Union                    | 1,198,679           | 1,211,964           | 1,265,650           | 1,244,302           | 1,235,964           | 1,207,947           | 1,258,133           | 1,238,371           | 1,206,294           | 1,272,479           | 1,309,989           | 1,160,090           | 14,809,863           |
| Undetermined                 | -                   | -                   | -                   | -                   | (11,043)            | -                   | -                   | -                   | -                   | -                   | -                   | -                   | (11,043)             |
| <b>Total DEK Labor</b>       | <b>\$ 1,963,218</b> | <b>\$ 1,905,595</b> | <b>\$ 2,334,464</b> | <b>\$ 2,061,706</b> | <b>\$ 1,966,924</b> | <b>\$ 1,982,770</b> | <b>\$ 2,011,547</b> | <b>\$ 2,363,470</b> | <b>\$ 1,934,729</b> | <b>\$ 1,947,659</b> | <b>\$ 1,991,186</b> | <b>\$ 1,908,699</b> | <b>\$ 24,371,969</b> |



**Duke Energy Kentucky**  
**Case No. 2019-00271**  
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**PUBLIC STAFF-POST-HEARING-DR-01-027**  
**(As to Attachment only)**

**REQUEST:**

Refer to Duke Kentucky's response to Staff's Second Request, Item 30, Attachment 11.

Explain why the portions of this contract that do not relate to Duke Kentucky are redacted.

Provide a completely unredacted copy of this contract.

**RESPONSE:**

**CONFIDENTIAL PROPRIETARY TRADE SECRET (As to Attachment only)**

It is Duke Energy procedure when producing contracts to redact the jurisdictional information that is not at issue in the present matter. Therefore, Duke Energy Kentucky typically redacts information for sister companies that are not related to Kentucky cases.

Please see STAFF-POST-HEARING-DR-01-027 Confidential Attachment for a completely unredacted copy of the contract.

**PERSON RESPONSIBLE:** T.K. Christie

**CONFIDENTIAL PROPRIETARY TRADE**

**SECRET**

**STAFF-POST-HEARING-DR-01-027**

**CONFIDENTIAL ATTACHMENT**

**FILED UNDER SEAL**