

**COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION**

IN THE MATTER OF:

The Electronic Application of Duke Energy Kentucky, Inc., for: 1) An
Adjustment of the Electric Rates; 2) Approval of New Tariffs; 3) Approval
of Accounting Practices to Establish Regulatory Assets and Liabilities;
and 4) All Other Required Approvals and Relief

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Case No. 2019-00271

**FIRST SET OF DATA REQUESTS OF THE KROGER CO.
TO DUKE ENERGY KENTUCKY, INC.**

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COUNSEL FOR THE KROGER CO.

Dated: October 14, 2019

DEFINITIONS

1. "Document" means the original and all copies (regardless of origin and whether or not including additional writing thereon or attached thereto) of memoranda, reports, books, manuals, instructions, directives, records, forms, notes, letters, notices, confirmations, telegrams, pamphlets, notations of any sort concerning conversations, telephone calls, meetings or other communications, bulletins, transcripts, diaries, analyses, summaries, correspondence investigations, questionnaires, surveys, worksheets, and all drafts, preliminary versions, alterations, modifications, revisions, changes, amendments and written comments concerning the foregoing, in whatever form, stored or contained in or on whatever medium, including computerized memory or magnetic media.
2. "Study" means any written, recorded, transcribed, taped, filmed, or graphic matter, however produced or reproduced, either formally or informally, a particular issue or situation, in whatever detail, whether or not the consideration of the issue or situation is in a preliminary stage, and whether or not the consideration was discontinued prior to completion.
3. "Person" means any natural person, corporation, professional corporation, partnership, association, joint venture, proprietorship, firm, or the other business enterprise or legal entity.
4. A request to identify a natural person means to state his or her full name and residence address, his or her present last known position and business affiliation at the time in question.
5. A request to identify a document means to state the date or dates, author or originator, subject matter, all addressees and recipients, type of document (e.g., letter, memorandum, telegram, chart, etc.), number of code number thereof or other means of identifying it, and its present location and custodian. If any such document was, but is no longer in the Company's possession or subject to its control, state what disposition was made of it.
6. A request to identify a person other than a natural person means to state its full name, the address of its principal office, and the type of entity.
7. "And" and "or" should be considered to be both conjunctive and disjunctive, unless specifically stated otherwise.
8. "Each" and "any" should be considered to be both singular and plural, unless specifically stated otherwise.
9. Words in the past tense should be considered to include the present, and words in the present tense include the past, unless specifically stated otherwise.
10. "You" or "your" means the person whose filed testimony is the subject of these interrogatories and, to the extent relevant and necessary to provide full and complete answers to any request, "you" or "your" may be deemed to include any person with information relevant to any interrogatory who is or was employed by or otherwise associated with the witness or who assisted, in any way, in the preparation of the witness' testimony.
11. "Company" or "DEK" means Duke Energy Kentucky, Inc. and/or any of their officers, directors, employees or agents who may have knowledge of the particular matter addressed, and affiliates.

INSTRUCTIONS

1. If any matter is evidenced by, referenced to, reflected by, represented by, or recorded in any document, please identify and produce for discovery and inspection each such document.
2. These interrogatories are continuing in nature, and information which the responding party later becomes aware of, or has access to, and which is responsive to any request is to be made available to The Kroger Co. Any studies, documents, or other subject matter not yet completed that will be relied upon during the course of this case should be so identified and provided as soon as they are completed. The Respondent is obliged to change, supplement and correct all answers to interrogatories to conform to available information, including such information as it first becomes available to the Respondent after the answers hereto are served.
3. Unless otherwise expressly provided, each interrogatory should be construed independently and not with reference to any other interrogatory herein for purpose of limitation.
4. The answers provided should first restate the question asked and also identify the person(s) supplying the information.
5. Please answer each designated part of each information request separately. If you do not have complete information with respect to any interrogatory, so state and give as much information as you do have with respect to the matter inquired about, and identify each person whom you believe may have additional information with respect thereto.
6. In the case of multiple witnesses, each interrogatory should be considered to apply to each witness who will testify to the information requested. Where copies of testimony, transcripts or depositions are requested, each witness should respond individually to the information request.
7. The interrogatories are to be answered under oath by the witness(es) responsible for the answer.
8. Responses to requests for revenue, expense and rate base data should provide data on the basis of Total company as well as Intrastate data, unless otherwise requested.

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- Q.1-1 Please provide an electronic version of the Company's confidential filing documents, workpapers, and responses to discovery in this case. To the extent the Company files corrections, revisions, amendments, supplemental information and/or errata to these documents, please provide all updated materials.
- Q.1-2 Regarding non-fuel, non-labor O&M expense inflation/escalation:
- a. Please indicate whether any inflation, price escalation, or unit cost escalation has been included in the calculation of non-labor, non-fuel O&M expenses for the estimated portion of the base period or the Forecasted Test Period.
 - b. If inflation or cost escalation has been included in the calculation of non-labor, non-fuel O&M expenses, please provide DEK's best estimate of the dollar amount of inflation included in the Forecasted Test Period applicable to non-labor, non-fuel O&M expenses.
 - c. If inflation or cost escalation has been included in the calculation of non-labor, non-fuel O&M expenses, please explain how the inflation or cost escalation factors were derived, and provide the inflation or cost escalation factors applicable to each affected FERC account for both the estimated portion of the Base Period and the Forecasted Test Period, if applicable.
 - d. If inflation or cost escalation has been included in the calculation of non-labor, non-fuel O&M expenses, please provide detailed workpapers in Excel format with intact formulas which apply the inflation or cost escalation factors to the actual historical data. For each affected FERC account, please provide the actual historical non-labor, non-fuel O&M expense amount to which the inflation/escalation is applied, the amount of the inflation/escalation, and the projected O&M expense amount after inflation/escalation.

- e. If not otherwise provided in the Company's response to part (d), please provide workpapers in Excel format which link the inflation/escalation amounts to the Filing Requirements schedules and/or revenue requirement model, or otherwise demonstrate how these inflation/escalation amounts are integrated into the Base Period and Forecasted Test Period revenue requirements.

Q.1-3 Please refer to the following link at [cvgairport.com](https://www.cvgairport.com) (<https://www.cvgairport.com/about/next/amazon-and-cvg/amazonatcvg>) which discusses the Amazon Air Hub facility currently under construction at Cincinnati/Northern Kentucky International Airport. Will Duke Energy Kentucky be the electric service provider for the Amazon Air Hub facility? If yes, please provide a response to the following (please break out responses by phase of construction if appropriate):

- a. Provide the rate schedule(s) that the Amazon Air Hub facility is likely to be served under.
- b. Provide the expected level of electric consumption for the Amazon Air Hub facility.
- c. Provide the expected commercial operation start date for the Amazon Air Hub facility.
- d. Does Duke Energy Kentucky plan to offer an incentive electric rate? If yes, please describe the rate.
- e. Are revenues and expenses associated with the Amazon Air Hub facility included in the future test year in this proceeding?

Respectfully submitted,



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