

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

In the Matter of:

**ELECTRONIC APPLICATION OF DUKE ENERGY)
KENTUCKY, INC. FOR: 1) AN ADJUSTMENT OF)
THE ELECTRIC RATES; 2) APPROVAL OF NEW)
TARIFFS; 3) APPROVAL OF ACCOUNTING)
PRACTICES TO ESTABLISH REGULATORY)
ASSETS AND LIABILITIES; AND 4) ALL OTHER)
REQUIRED APPROVALS AND RELIEF)**

**CASE NO.
2019-00271**

ATTORNEY GENERAL’S INITIAL REHEARING DATA REQUESTS

Comes now the intervenor, the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention (“Attorney General”), and submits these Rehearing Data Requests to Duke Energy Kentucky, Inc. (hereinafter “DEK” or the “Company”) to be answered by July 6, 2020, and in accord with the following:

- (1) In each case where a request seeks data provided in response to a staff request, reference to the appropriate requested item will be deemed a satisfactory response.
- (2) Identify the witness who will be prepared to answer questions concerning each request.
- (3) Repeat the question to which each response is intended to refer.
- (4) These requests shall be deemed continuing so as to require further and supplemental responses if the company receives or generates additional information within the scope of these requests between the time of the response and the time of any hearing conducted hereon.
- (5) Each response shall be answered under oath or, for representatives of a public or private

corporation or a partnership or association, be accompanied by a signed certification of the preparer or person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

(6) If you believe any request appears confusing, please request clarification directly from undersigned Counsel for the Office of Attorney General.

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

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

(9) If the company has objections to any request on the grounds that the requested information is proprietary in nature, or for any other reason, notify the Office of the Attorney General as soon as possible, and in accordance with Commission direction.

(10) As used herein, the words "document" or "documents" are to be construed broadly and shall mean the original of the same (and all non-identical copies or drafts thereof) and if the original is not available, the best copy available. These terms shall include all information recorded in any written, graphic or other tangible form and shall include, without limiting the generality of the foregoing, all reports; memoranda; books or notebooks; written or recorded statements, interviews, affidavits and depositions; all letters or correspondence; telegrams, cables and telex messages; contracts, leases, insurance policies or other agreements; warnings and caution/hazard notices or labels; mechanical

and electronic recordings and all information so stored, or transcripts of such recordings; calendars, appointment books, schedules, agendas and diary entries; notes or memoranda of conversations (telephonic or otherwise), meetings or conferences; legal pleadings and transcripts of legal proceedings; maps, models, charts, diagrams, graphs and other demonstrative materials; financial statements, annual reports, balance sheets and other accounting records; quotations or offers; bulletins, newsletters, pamphlets, brochures and all other similar publications; summaries or compilations of data; deeds, titles, or other instruments of ownership; blueprints and specifications; manuals, guidelines, regulations, procedures, policies and instructional materials of any type; photographs or pictures, film, microfilm and microfiche; videotapes; articles; announcements and notices of any type; surveys, studies, evaluations, tests and all research and development (R&D) materials; newspaper clippings and press releases; time cards, employee schedules or rosters, and other payroll records; cancelled checks, invoices, bills and receipts; and writings of any kind and all other tangible things upon which any handwriting, typing, printing, drawings, representations, graphic matter, magnetic or electrical impulses, or other forms of communication are recorded or produced, including audio and video recordings, computer stored information (whether or not in printout form), computer-readable media or other electronically maintained or transmitted information regardless of the media or format in which they are stored, and all other rough drafts, revised drafts (including all handwritten notes or other marks on the same) and copies of documents as hereinbefore defined by whatever means made.

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

and, the nature and legal basis for the privilege asserted.

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

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

(14) “And” and “or” should be considered to be both conjunctive and disjunctive, unless specifically stated otherwise.

(15) “Each” and “any” should be considered to be both singular and plural, unless specifically stated otherwise.

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Respectfully submitted,

DANIEL CAMERON
ATTORNEY GENERAL



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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

1. For all projects being or to be recovered through Rider ESM, provide the actual and projected additions by project for each month starting January 2019 and ending with March 31, 2021. Provide in electronic format with all formulas intact.
2. Indicate whether all plant balances for which costs are recovered through Rider ESM are reflected in FERC account 311 as they appear to be in the adjustments to remove such costs in Schedule B-2-2.
3. Refer to the responses to Staff 2-06 and Staff 2-07 which provide a breakdown of plant by FERC Account for the base year and the test year, respectively. Provide a similar schedule which starts with December 31, 2018 balances by FERC account and depicts steam production plant additions, retirements, and ending balances by plant account for each month starting with January 2019 and ending with March 31, 2021 that were used in the as-filed original projections. Provide a breakdown of the data separately for any FERC plant account that contains amounts for projects being recovered through Rider ESM. For all amounts that were depicted as Completed Construction Not Classified in the as-filed original projections, provide the amounts of such that were considered to be related to projects being recovered through Rider ESM. Provide in electronic format with all formulas intact.
4. Refer to Schedule B-2-2 and further to the adjustment of (\$41,089,898) for the base year and (\$69,086,352) for the test year to “remove assets recovered through the ESM rider.” Provide copies of all workpapers used to derive these amounts in electronic format with all formulas intact.
5. Provide a copy of the capital budgets pertaining to projects being recovered through Rider ESM for 2019, 2020, and 2021.
6. Please identify and describe all typical costs associated with LED Outdoor Lighting, including financing costs.
7. For the Fixture, Maintenance, and Equipment monthly charges associated with LED Outdoor Lighting, please describe how average installed costs are calculated and provide an illustrative example of those calculations.
8. Describe the financing facilities utilized by Duke to pay the upfront costs associated with LED Outdoor Lighting if the customer elects to pay monthly.
9. Describe and specifically identify any increased or additional costs Duke would accrue should it be required to allow customers to “pay off” fixed charges associated with LED Outdoor Lighting by monthly payments should the Commission order it to do so.
10. Explain how the costs of the LED pole foundations, brackets and wiring is determined and calculated.

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11. Explain how the monthly charge is calculated to cover the costs of the LED pole foundations, brackets and wiring.
12. Would Duke agree to limit the duration of the monthly charge for the LED Outdoor Lighting? If not, please explain why.
13. Please respond to the following from page 22, second paragraph, of the Commission's Order of June 4, 2020:

“Having reviewed the relevant record, the rehearing pleadings, and being otherwise sufficiently advised, the Commission finds that rehearing should be granted on this issue in order to obtain more information and to **inquire as to why this provision was not structured similarly to Duke Kentucky's Rate OL-E, Outdoor Lighting Equipment Installation, which has been in Duke Energy's tariff in its current form since at least 2007.**” (emphasis added)