

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

An Electronic Examination of the)	
Application of the Fuel Adjustment)	Case No. 2020-00249
Clause of Duke Energy Kentucky, Inc.)	
From November 1, 2019 Through)	
April 30, 2020)	

PETITION OF DUKE ENERGY KENTUCKY, INC.
FOR CONFIDENTIAL TREATMENT OF INFORMATION
CONTAINED IN ITS RESPONSES TO COMMISSION STAFF'S
FIRST SET OF DATA REQUESTS ISSUED AUGUST 19, 2020

Duke Energy Kentucky, Inc. (Duke Energy Kentucky or Company), pursuant to 807 KAR 5:001, Section 13, respectfully requests the Commission to classify and protect certain information provided by Duke Energy Kentucky in its attachment to response to Data Request No. 21, First Set, as requested by Commission Staff (Staff) in this case on August 19, 2020. The information that Staff seeks through discovery and for which Duke Energy Kentucky now seeks confidential treatment (Confidential Information) includes fuel solicitation proposal evaluation and rankings.

More specifically, the Confidential Information provided in response to Data Request No. 21 contains sensitive information, the disclosure of which would injure Duke Energy Kentucky and its competitive position and business interest. Duke Energy Corporation's Regulated Fuels Group is responsible for the procurement of fuel and obtaining competitive pricing. Releasing this information would give potential competitors and fuel vendors for Duke Energy Kentucky in the energy markets inside information about Duke Energy Kentucky's fuel procurement strategy, risk mitigation actions, and tolerances. Releasing this information would harm the Company and its customers in the future as competitors and counterparties would know how Duke Energy Kentucky

evaluates its fuel supply and procures fuel for its generating station. If publicly available, competitors could use this information to manipulate the market and financially harm Duke Energy Kentucky's customers by adjusting their bidding strategies and potentially manipulating the price the Company pays for coal.

In support of this Petition, Duke Energy Kentucky states:

1. The Kentucky Open Records Act exempts from disclosure certain commercial information. KRS 61.878(1)(c). To qualify for this exemption and, therefore, maintain the confidentiality of the information, a party must establish that disclosure of the commercial information would permit an unfair advantage to competitors of that party. Public disclosure of the information identified herein would, in fact, prompt such a result for the reasons set forth below.

2. The public disclosure of the Confidential Information would provide competitors and potential vendors proprietary information regarding the fuel procurement strategies used by Duke Energy Kentucky, placing it at a commercial disadvantage as it bids into the energy markets or negotiates with various suppliers and vendors. This situation would potentially harm Duke Energy Kentucky's competitive position in the marketplace, to the detriment of Duke Energy Kentucky and its customers undermining its ability to bid on contracts against parties, who do not otherwise have to disclose such information, and who could use that information to their competitive advantage and possibly win contracts that they otherwise couldn't, absent such information

3. Further, disclosure of the aforementioned Confidential Information would damage Duke Energy Kentucky's competitive position and business interests, as well as, create the risk of increased costs to its customers. If the Commission grants public access to the Confidential

Information requested, potential counterparties could manipulate markets, costs, and prices to the detriment of Duke Energy Kentucky and its ratepayers by tailoring bids to correspond to and comport with Duke Energy Kentucky's prior actions and risk tolerances.

4. The Confidential Information was developed internally by Duke Energy Corporation and Duke Energy Kentucky personnel, it is not on file with any public agency in the manner as is provided in response to this Commission-issued data request. The information is not available from any commercial or other source outside Duke Energy Kentucky. The aforementioned information is distributed within Duke Energy Kentucky only to those employees who must have access for business reasons and is generally recognized as confidential and proprietary in the energy industry.

5. Duke Energy Kentucky does not object to limited disclosure of the confidential information described herein, pursuant to an acceptable protective agreement, the Staff or other intervenors with a legitimate interest in reviewing the same for the purpose of participating in this case.

6. This information was, and remains, integral to Duke Energy Kentucky's effective execution of business decisions. And such information is generally regarded as confidential or proprietary. Indeed, as the Kentucky Supreme Court has found, "information concerning the inner workings of a corporation is 'generally accepted as confidential or proprietary.'" *Hoy v. Kentucky Industrial Revitalization Authority*, Ky., 904 S.W.2d 766, 768 (Ky. 1995).

7. In accordance with the provisions of 807 KAR 5:001, Section 13(3), the Company is filing one copy of the Confidential Information separately under seal, and one copy without the Confidential Information included.

8. Duke Energy Kentucky respectfully requests that the Confidential Information be withheld from public disclosure for a period of ten years. This will assure that the Confidential Information – if disclosed after that time – will no longer be commercially sensitive so as to likely impair the interests of the Company or its customers if publicly disclosed.

9. To the extent the Confidential Information becomes generally available to the public, whether through filings required by other agencies or otherwise, Duke Energy Kentucky will notify the Commission and have its confidential status removed, pursuant to 807 KAR 5:001 Section 13(10)(a).

WHEREFORE, Duke Energy Kentucky, Inc., respectfully requests that the Commission classify and protect as confidential the specific information described herein.

Respectfully submitted,

DUKE ENERGY KENTUCKY, INC.

/s/Rocco O. D'Ascenzo
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CERTIFICATE OF SERVICE

This is to certify that the foregoing electronic filing is a true and accurate copy of the document being filed in paper medium; that the electronic filing was transmitted to the Commission on September 2, 2020; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and the original filing in paper medium will be delivered to the Commission pending further instruction from Case No. 2020-00085.¹

John G. Horne, II
The Office of the Attorney General
Utility Intervention and Rate Division
700 Capital Avenue, Ste 118
Frankfort, Kentucky 40601

/s/ Rocco D'Ascenzo _____
Rocco D'Ascenzo

¹ *In the Matter of Electronic Emergency Docket Related to the Novel Coronavirus COVID-19*, Order, Case No. 2020-00085 (Ky. P.S.C. March 16, 2020).

KyPSC Case No. 2020-00249
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**Duke Energy Kentucky
Case No. 2020-00249
Staff First Set Data Requests
Date Received: August 19, 2020**

STAFF-DR-01-001

REQUEST:

For the period under review, provide the amount of coal purchased in tons and the percentage of purchases that were spot versus contract.

RESPONSE:

For the period under review from November 1, 2019 through April 30, 2020, please see STAFF-DR-01-001 Attachment.

PERSON RESPONSIBLE: Brett Phipps

**Duke Energy Kentucky
 Case No. 2020-00008 - Staff First Set Data Requests
 Coal purchased November 1, 2019 - April 30, 2020**

<u>Vendor</u>	<u>Purchase Tonnage</u>	<u>Purchase Type</u>	<u>Contract #</u>	<u>Filed with Commission</u>	<u>If no, Explain why</u>
Alliance Coal LLC	54,771	Spot	DEK33148	2/25/2019	
Knighthawk	136,425	Contract	DEK 33097	2/25/2019	
Alliance Coal LLC	88,131	Contract	DEK32262	1/23/2018	
Alliance Coal LLC	82,166	Contract	DEK33073	2/25/2019	
Forsight Coal Sales	80,391	Contract	DEK32274	4/5/2018	
Peabody Coal Sales LLC*	28,941	Spot	DEK33101	2/25/2019	
Total	<u>470,824</u>				
	82%	Contract			
	18%	Spot			
	100%	Total			

Duke Energy Kentucky
Case No. 2020-00249
Staff First Set Data Requests
Date Received: August 19, 2020

STAFF-DR-01-002

REQUEST:

For the period under review, list each coal purchase made under a long-term contract (one year or greater). For each purchase, list:

- a. Contract or purchase order number;
- b. The supplier's name;
- c. The location(s) of production facilities from which the coal is sourced;
- d. The method of delivery, (i.e., barge, truck, rail, other);
- e. The actual quantity received during the review period;
- f. The tonnage requirement for the new period; and
- g. Current price paid per ton.

RESPONSE:

- a. 33097
- b. Knight Hawk Coal LLC
- c. Knight Hawk's Prairie Eagle Mine, IL
- d. Barge
- e. 136,425
- f. 137,500
- g. \$40.40

- a. 32262
- b. Alliance Coal, LLC
- c. Tunnel Ridge, Ohio County, WV
- d. Barge
- e. 88,131
- f. 156,250
- g. \$37.25

- a. 33073
- b. Alliance Coal, LLC
- c. Tunnel Ridge, Ohio County, WV
- d. Barge
- e. 82,166
- f. 95,750
- g. \$46.27

- a. 32274
- b. Foresight Coal Sales, LLC.
- c. Shay Mine, Carlinville, Illinois
- d. Barge
- e. 80,391
- f. 96,500
- g. \$33.94

PERSON RESPONSIBLE: Brett Phipps

Duke Energy Kentucky
Case No. 2020-00249
Staff First Set Data Requests
Date Received: August 19, 2020

STAFF-DR-01-003

REQUEST:

As of the last day of the review period:

- a. State the coal inventory level in tons and in number of days' supply. Provide this information by generating station and in the aggregate.
- b. Describe the criteria used to determine number of days' supply.
- c. State the target coal inventory level for each generating station and for the total systems.
- d. If actual coal inventory exceeds the target inventory by ten days' supply, state the reasons for the excess inventory.
- e. State whether any significant changes in the current coal inventory target are expected within the next 12 months. If so, state the expected change and the reasons for this change.

RESPONSE:

- a. Duke Energy Kentucky's total aggregate inventory across the system as of April 30, 2020 was 240,403 tons, or 37 days.
- b. The number of days' supply is computed by dividing the ending coal inventory number stated in tons by the Full Load Burn figure of 6,500 tons per day.

- c. The target goal inventory is an annual average of 45 days compared to the actual inventory amount of 37 days on April 30, 2020 for East Bend Station which is the only coal-fired generating station in the Duke Energy Kentucky fleet.
- d. Duke Energy Kentucky's coal inventory did not exceed the inventory target by ten days of supply.
- e. Duke Energy Kentucky does not expect any significant changes in its current coal inventory target within the next 12 months.

PERSON RESPONSIBLE: Brett Phipps

Duke Energy Kentucky
Case No. 2020-00249
Staff First Set Data Requests
Date Received: August 19, 2020

STAFF-DR-01-004

REQUEST:

List each written coal supply solicitation issued during the period under review.

- a. For each solicitation, provide the date of the solicitation, the type of solicitation (contract or spot), the quantities solicited, a general description of the quality of coal solicited, the period over which deliveries were requested and the generating unit(s) for which the coal was intended.
- b. For each solicitation, state the number of vendors to whom the solicitation was sent, the number of vendors who responded, and the selected vendor. Provide the bid tabulation sheet or corresponding document that ranked the proposals. (This document should identify all vendors who made offers.) State the reasons of each selection. For each lowest-cost bid not selected, explain why the bid was not selected.

RESPONSE:

- a. Duke Energy Kentucky did not issue a written coal supply solicitation during November 1, 2019 through April 30, 2020.
- b. N/A

PERSON RESPONSIBLE: Brett Phipps

Duke Energy Kentucky
Case No. 2020-00249
Staff First Set Data Requests
Date Received: August 19, 2020

STAFF-DR-01-005

REQUEST:

List each oral coal supply solicitation issued during the period under review.

- a. For each solicitation; state why the solicitation was not written, the date(s) of the solicitation, the quantities solicited, a general description of the quality of coal solicited, the time period over which deliveries were requested, and the generating unit(s) for which the coal was intended.
- b. For each solicitation, identify all vendors solicited and the vendor selected. Provide the tabulation sheet or other document that ranks the proposals. (This document should identify all vendor who made offers.) State the reasons for each selection.

For each lowest-cost bid not selected, explain why the bid was not selected.

RESPONSE:

- a. Duke Energy Kentucky did not issue an oral coal supply solicitation during November 1, 2019 through April 30, 2020.
- b. N/A

PERSON RESPONSIBLE: Brett Phipps

**Duke Energy Kentucky
Case No. 2020-00249
Staff First Set Data Requests
Date Received: August 19, 2020**

STAFF-DR-01-006

REQUEST:

For the period under review, list each vendor from whom natural gas was purchased for generation and the quantities and the nature of each purchase (i.e., spot or contract).

RESPONSE:

Please see STAFF-DR-01-006 Attachment which lists each vendor from whom natural gas was purchased for the period of November 1, 2019 to April 30, 2020.

PERSON RESPONSIBLE: Brett Phipps

**Duke Energy Kentucky - Physical Natural Gas Purchases
 November 1, 2019 - April 30, 2020**

Spot/Contract	Counterpart	Start Date	End Date	Buy/Sell	Qty	Qty UOM
Spot	Eco Energy Nat Gas	7-Nov-19	7-Nov-19	Buy	5,000	MMBtu
Spot	Eco Energy Nat Gas	11-Nov-19	11-Nov-19	Buy	6,000	MMBtu
Spot	Eco Energy Nat Gas	12-Nov-19	12-Nov-19	Buy	7,000	MMBtu
Spot	TENASKA MARKETING VE	13-Nov-19	13-Nov-19	Buy	5,000	MMBtu
Spot	Eco Energy Nat Gas	15-Nov-19	15-Nov-19	Buy	5,000	MMBtu
Spot	Eco Energy Nat Gas	17-Nov-19	17-Nov-19	Buy	5,000	MMBtu
Spot	Eco Energy Nat Gas	18-Nov-19	18-Nov-19	Buy	3,000	MMBtu
Spot	Eco Energy Nat Gas	19-Nov-19	19-Nov-19	Buy	3,000	MMBtu
Spot	Eco Energy Nat Gas	9-Dec-19	9-Dec-19	Buy	7,000	MMBtu
Spot	Eco Energy Nat Gas	13-Dec-19	13-Dec-19	Buy	5,000	MMBtu
Spot	NJR Energy Servic G	19-Dec-19	19-Dec-19	Buy	10,000	MMBtu
Spot	NJR Energy Servic G	21-Jan-20	21-Jan-20	Buy	2,000	MMBtu
Spot	Eco Energy Nat Gas	12-Feb-20	12-Feb-20	Buy	7,000	MMBtu
Spot	Eco Energy Nat Gas	13-Feb-20	13-Feb-20	Buy	5,000	MMBtu
Spot	Eco Energy Nat Gas	13-Feb-20	13-Feb-20	Buy	2,000	MMBtu
Spot	NJR Energy Servic G	13-Feb-20	13-Feb-20	Buy	1,000	MMBtu

Duke Energy Kentucky
Case No. 2020-00249
Staff First Set Data Requests
Date Received: August 19, 2020

STAFF-DR-01-007

REQUEST:

For the period under review, state whether there were any instances in which a natural gas generating unit could not be operated when it otherwise would have run due to pipeline constraints or natural gas being unavailable.

RESPONSE:

During the period under review, a review of the Company’s North American Electric Reliability Corporation (NERC) Generating Availability Data System (GADS) records and dispatcher logs for Woodsdale Station showed the following events where a natural gas generating unit could not be operated due to pipeline constraints or natural gas being unavailable.

Unit Name	Event Start	Event End	Derate (MW)	Event Duration (Hours)	Equivalent MWH	Event Description
Woodsdale CT3	11/12/19 6:08 AM	11/12/19 12:00 PM	94	5.87	510.40	Gas pressure from Texas Eastern low
Woodsdale CT3	11/13/19 6:55 AM	11/13/19 2:00 PM	94	7.08	616.25	Gas pressure from Texas Eastern low
Woodsdale CT4	11/18/19 12:08 PM	11/18/19 2:29 PM	94	2.35	202.10	Gas pressure from Texas Eastern low
Woodsdale CT5	11/12/19 6:18 AM	11/12/19 12:00 PM	94	5.70	495.90	Gas pressure from Texas Eastern low
Woodsdale CT6	11/12/19 6:18 AM	11/12/19 12:00 PM	94	5.70	495.90	Gas pressure from Texas Eastern low

PERSON RESPONSIBLE: John Swez
Brett Phipps

**Duke Energy Kentucky
Case No. 2020-00249
Staff First Set Data Requests
Date Received: August 19, 2020**

STAFF-DR-01-008

REQUEST:

State whether there have been any changes to hedging activities for coal or natural gas purchases used for generation since the previous FAC review proceeding. If so, describe the changes in detail.

RESPONSE:

Coal:

Duke Energy Kentucky does not engage in financial hedging transactions with respect to coal purchases. Duke Energy Kentucky contracts for physical deliveries of coal through fixed term coal transactions within a balanced portfolio of purchases. The Company also maintains a portfolio with multiple suppliers to mitigate potential supply interruption risk.

Natural Gas:

Duke Energy Kentucky does not engage in any financial hedging activity for natural gas purchases used for generation.

PERSON RESPONSIBLE: Brett Phipps

Duke Energy Kentucky
Case No. 2020-00249
Staff First Set Data Requests
Date Received: August 19, 2020

STAFF-DR-01-009

REQUEST:

State whether Duke Kentucky has audited any of its fuel or transportation contracts during the period under review. If so, for each audited contract:

- a. Identify the contract;
- b. Identify the auditor; and
- c. State the results of the audit and describe the actions that Duke Kentucky took as a result of the audit.

RESPONSE:

Coal

Duke Energy Kentucky has not audited any of its coal or coal transportation contracts during the period of November 1, 2019 through April 30, 2020.

Natural Gas, Natural Gas Transportation, and Fuel Oil

Duke Energy Kentucky has not audited any of its fuel or transportation contracts during the period of November 1, 2019 through April 30, 2020.

PERSON RESPONSIBLE: Brett Phipps

**Duke Energy Kentucky
Case No. 2020-00249
Staff First Set Data Requests
Date Received: August 19, 2020**

STAFF-DR-01-010

REQUEST:

- a. State whether Duke Kentucky is currently involved in any litigation with its current or former fuel supplier or transportation vendors. If yes, for each litigation:
 - 1) Identify the supplier or vendor;
 - 2) Identify the contract involved;
 - 3) State the potential liability or recovery to Duke Kentucky;
 - 4) List the issues presented; and
 - 5) Provide a copy of the complaint or other legal pleading that initiated the litigation and any answers or counterclaims. If a copy has previously been filed with the Commission, provide the date on which it was filed and the case in which it was filed.
- b. State the current status of all litigation with suppliers or vendors.

RESPONSE:

- a. Duke Energy Kentucky is not currently involved in any litigation with its current or former fuel suppliers or transportation vendors.
- b. N/A

PERSON RESPONSIBLE: Brett Phipps

Duke Energy Kentucky
Case No. 2020-00249
Staff First Set Data Requests
Date Received: August 19, 2020

STAFF-DR-01-011

REQUEST:

- a. For the period under review state whether there have been any changes to Duke Kentucky's written policies and procedures regarding its fuel procurement. If yes:
 - 1) Describe the changes;
 - 2) Provide the written policies and procedures as changed;
 - 3) State the date(s) the changes were made; and
 - 4) Explain why the changes were made.
- b. If no, provide the date Duke Kentucky's current fuel procurement policies and procedures were last changed, provide the date when they were last provided to the Commission, and identify the proceeding in which they were provided.

RESPONSE:

Coal

- a. There have not been any changes to Duke Energy Kentucky's written policies and procedures regarding its fuel procurement.
- b. The "Regulated Utilities Risk Management Control Manual" was updated January 2018 and the "Regulated Utilities Risk Limits" document was updated January of 2017. These two documents were submitted in Case No. 2018-00220 as STAFF-DR-01-011 Confidential Attachments 1 and 2. The "Commodity Risk Policy" was

updated January of 2014. This document was submitted with the Company's responses to Staff's requests for information in Case No. 2016-00005.

The "Coal and Emissions Reducing Chemicals Procurement Procedure" was updated December of 2016 and was filed on January 20, 2017.

Natural Gas & Fuel Oil

- a. The following procedures remained unchanged during the period under review:
Fuels and System Optimization (FSO) DEK Emissions Trading Process & Procedure Check List," and the "Fuel Oil Emergency Procedure" were updated in May 2015, and June 2015, respectively. These two documents were submitted with the Company's responses to Staff's requests for information in Case No. 2017-00005.
- b. The "DEI and DEK Gas Trading Procedure for Off-Premise Transactions" was updated June 2019 and the document was submitted with the Company's responses to Staff's requests for information in Case No. 2020-00008.

PERSON RESPONSIBLE: Brett Phipps

**Duke Energy Kentucky
Case No. 2020-00249
Staff First Set Data Requests
Date Received: August 19, 2020**

STAFF-DR-01-012

REQUEST:

For the period under review, list all firm power commitments for: (a) purchases and (b) sales. This list shall identify the electric utility, the amount of commitment in megawatts, and the purpose of the commitment (i.e., peaking, emergency).

RESPONSE:

Duke Energy Kentucky had no firm power commitments during this period.

PERSON RESPONSIBLE: John Swez

**Duke Energy Kentucky
Case No. 2020-00249
Staff First Set Data Requests
Date Received: August 19, 2020**

STAFF-DR-01-013

REQUEST:

Provide a monthly billing summary of sales to all electric utilities for the period under review.

RESPONSE:

Please see STAFF-DR-01-013 Attachment.

PERSON RESPONSIBLE: Libbie S. Miller

DUKE ENERGY KENTUCKY
 POWER TRANSACTION SCHEDULE

Supplier/Buyer	Transaction Type	kWh	Charges (\$)			
			Demand	Fuel	Other	Total
Month Ended November 30, 2019						
PJM Interconnection, LLC	Econ Sales	2,827,810	0	83,589	(30,859)	52,730
	Total Sales	2,827,810	0	83,589	(30,859)	52,730
Month Ended December 31, 2019						
PJM Interconnection, LLC	Econ Sales	9,084,290		212,207	(5,773)	206,434
	Total Sales	9,084,290	0	212,207	(5,773)	206,434
Month Ended January 31, 2020						
PJM Interconnection, LLC	Econ Sales	12,983,130		278,971	13,115	292,086
	Total Sales	12,983,130	0	278,971	13,115	292,086
Month Ended February 29, 2020						
PJM Interconnection, LLC	Econ Sales	1,119,760		26,765	(86)	26,679
	Total Sales	1,119,760	0	26,765	(86)	26,679
Month Ended March 31, 2020						
PJM Interconnection, LLC	Econ Sales	7,091,830		160,807	(17,276)	143,531
	Total Sales	7,091,830	0	160,807	(17,276)	143,531
Month Ended April 30, 2020						
PJM Interconnection, LLC	Econ Sales	0		0	0	0
	Total Sales	0	0	0	0	0

Legend
 Econ Sales - Economy Sales

**Duke Energy Kentucky
Case No. 2020-00249
Staff First Set Data Requests
Date Received: August 19, 2020**

STAFF-DR-01-014

REQUEST:

Describe the effect on the FAC calculation of line losses related to:

- a. Intersystem sales when using a third-party transmission system and
- b. Intersystem sales when not using a third-party transmission system.

RESPONSE:

- a. Duke Energy Kentucky did not have any intersystem sales during the review period.
- b. N/A

PERSON RESPONSIBLE:

John Swez
Libbie S. Miller

**Duke Energy Kentucky
Case No. 2020-00249
Staff First Set Data Requests
Date Received: August 19, 2020**

STAFF-DR-01-015

REQUEST:

Provide a list in chronological order, showing by unit any schedule, actual, and forced outages for the period under review.

RESPONSE:

Please see STAFF-DR-01-015 Attachment.

PERSON RESPONSIBLE: John Swez

KY FAC Request
 November 2019 - April 2020

Unit Name	Event Type	Month	Scheduled Hours	Forced Hours	Actual Hours	Event Duration	Event Start	Event End	Description
East Bend 2	MO	November	240.0		240.0	240.0	11/12/2019 0:00	11/22/2019 0:00	Additional LPT repairs - Added L-0 Blade Replacement
East Bend 2	ME	November	64.7		64.7	64.7	11/22/2019 0:00	11/24/2019 16:42	Replacement of L-0 Blades
East Bend 2	U1	November		9.6	9.6	9.6	11/24/2019 17:12	11/25/2019 2:46	Unit trip due to vibration indication
East Bend 2	U1	November		3.8	3.8	3.8	11/26/2019 9:50	11/26/2019 13:40	#1 Bearing vibration indication
East Bend 2	U1	March		15.7	15.7	15.7	3/2/2020 10:20	3/3/2020 2:02	2-1 BFP Recirc. Flange Leak
Woodsdale CT1	MO	December	62.0		62.0	62.0	12/11/2019 6:00	12/13/2019 20:00	Outage to install balance weights
Woodsdale CT1	U1	December		14.5	14.5	14.5	12/13/2019 20:00	12/14/2019 10:30	Found ignition blowoff valve prox switch loose.
Woodsdale CT1	PO	March	332.0		332.0	332.0	3/7/2020 0:01	3/20/2020 21:00	Spring Prep and Boroscope Inspection
Woodsdale CT1	U1	March		2.3	2.3	2.3	3/26/2020 14:55	3/26/2020 17:10	Emergency Sanitation at Station Covid 19
Woodsdale CT1	PO	April	9.4		9.4	9.4	4/25/2020 6:00	4/25/2020 15:25	Plant Blackstart; disconnected from grid
Woodsdale CT2	PO	November	415.6		415.6	415.6	11/2/2019 6:00	11/19/2019 12:37	SFC and synchronizer outage
Woodsdale CT2	SF	December		1.9	1.9	1.9	12/12/2019 6:40	12/12/2019 8:32	Main NG regulator failed
Woodsdale CT2	PO	March	332.0		332.0	332.0	3/7/2020 0:01	3/20/2020 21:00	Spring Prep and Boroscope Inspection
Woodsdale CT2	U1	March		2.3	2.3	2.3	3/26/2020 14:55	3/26/2020 17:10	Emergency Sanitation at Station Covid 19
Woodsdale CT2	PO	April	9.4		9.4	9.4	4/25/2020 6:00	4/25/2020 15:25	Plant Blackstart; disconnected from grid
Woodsdale CT3	U1	November		5.9	5.9	5.9	11/12/2019 6:08	11/12/2019 12:00	Gas pressure from Texas Eastern low
Woodsdale CT3	U1	November		7.1	7.1	7.1	11/13/2019 14:00	11/13/2019 14:00	Gas pressure from Texas Eastern low
Woodsdale CT3	SF	December		1.9	1.9	1.9	12/12/2019 6:38	12/12/2019 8:32	Shut down 0648, gas reg not working
Woodsdale CT3	PO	March	164.0		164.0	164.0	3/14/2020 0:59	3/20/2020 21:00	Spring Prep and Boroscope Inspection
Woodsdale CT3	U1	March		2.3	2.3	2.3	3/26/2020 14:55	3/26/2020 17:10	Emergency Sanitation at Station Covid 19
Woodsdale CT3	PO	April	9.4		9.4	9.4	4/25/2020 6:00	4/25/2020 15:25	Plant Blackstart; disconnected from grid
Woodsdale CT4	U1	November		2.4	2.4	2.4	11/18/2019 12:08	11/18/2019 14:29	Gas pressure from Texas Eastern low
Woodsdale CT4	U1	December		1.7	1.7	1.7	12/12/2019 6:48	12/12/2019 8:32	Tripped at 0648, gas reg not working
Woodsdale CT4	PO	March	163.8		163.8	163.8	3/14/2020 0:59	3/20/2020 20:47	Spring Prep and Boroscope Inspection
Woodsdale CT4	U1	March		2.3	2.3	2.3	3/26/2020 14:55	3/26/2020 17:10	Emergency Sanitation at Station Covid 19
Woodsdale CT4	PO	April	9.4		9.4	9.4	4/25/2020 6:00	4/25/2020 15:25	Plant Blackstart; disconnected from grid
Woodsdale CT5	U1	November		5.7	5.7	5.7	11/12/2019 6:18	11/12/2019 12:00	Gas pressure from Texas Eastern low
Woodsdale CT5	SF	November		57.0	57.0	57.0	11/13/2019 8:44	11/15/2019 17:42	SF6 Gas in Gen Breaker low
Woodsdale CT5	PO	March	156.3		156.3	156.3	3/21/2020 6:00	3/27/2020 18:20	Spring prep outage
Woodsdale CT5	PO	April	9.4		9.4	9.4	4/25/2020 6:00	4/25/2020 15:25	Plant Blackstart; disconnected from grid
Woodsdale CT6	U1	November		5.7	5.7	5.7	11/12/2019 6:18	11/12/2019 12:00	Gas pressure from Texas Eastern low
Woodsdale CT6	U1	November		1.0	1.0	1.0	11/13/2019 8:06	11/13/2019 9:06	Trip during transfer from NG to FO
Woodsdale CT6	SF	December		2.0	2.0	2.0	12/12/2019 6:33	12/12/2019 8:32	Main gas reg. not working
Woodsdale CT6	SF	December		1.0	1.0	1.0	12/20/2019 7:44	12/20/2019 8:44	High level in fuel/water pump
Woodsdale CT6	PO	March	156.0		156.0	156.0	3/21/2020 6:00	3/27/2020 18:01	Spring prep outage
Woodsdale CT6	U1	April		76.8	76.8	76.8	4/7/2020 6:00	4/10/2020 10:46	Automatic Voltage Regulator Failure
Woodsdale CT6	PO	April	9.4		9.4	9.4	4/25/2020 6:00	4/25/2020 15:25	Plant Blackstart; disconnected from grid

Event Type Legend:

- PO Planned Outage
- PE Planned Outage Extension
- MO Maintenance Outage
- ME Maintenance Outage Extension
- U1 Unplanned (Forced) Outage – Immediate
- U2 Unplanned (Forced) Outage – Delayed
- U3 Unplanned (Forced) Outage – Postponed
- SF Startup Failure

Duke Energy Kentucky
Case No. 2020-00249
Staff First Set Data Requests
Date Received: August 19, 2020

STAFF-DR-01-016

REQUEST:

For the period under review provide the monthly capacity factor at which each generating unit operated.

RESPONSE:

Total Period - East Bend

<u>Month</u>	<u>Net MWH</u>	<u>Period Hours</u>	<u>MW Rating</u>	<u>MW Hours</u>	<u>Net Capacity Factor</u>
November 2019	38,649	720	600	432,000	8.95%
December 2019	358,241	744	600	446,400	80.25%
January 2020	255,012	744	600	446,400	57.13%
February 2020	145,894	696	600	417,600	34.94%
March 2020	220,862	744	600	446,400	49.48%
April 2020	<u>(4,850)</u>	<u>720</u>	<u>600</u>	<u>432,000</u>	<u>-1.12%</u>
Total	1,013,808	4,368	600	2,620,800	38.68%

Total Period - Woodsdale

<u>Woodsdale Station</u>	<u>Net MWH</u>	<u>Period Hours</u>	<u>MW Rating</u>	<u>MW Hours</u>	<u>Net Capacity Factor</u>
Unit 1	(269)	4,368	91.33	399,072	-0.07%
Unit 2	(327)	4,368	91.33	399,072	-0.08%
Unit 3	(262)	4,368	91.33	399,072	-0.07%
Unit 4	(209)	4,368	91.33	399,072	-0.05%
Unit 5	(110)	4,368	91.33	399,072	-0.03%
Unit 6	<u>20</u>	<u>4,368</u>	91.33	<u>399,072</u>	<u>0.01%</u>
Total	(1,157)	26,208	91.33	2,394,432	-0.05%

November 2019

Woodsdale <u>Station</u>	Net <u>MWH</u>	Period <u>Hours</u>	MW <u>Rating</u>	MW <u>Hours</u>	Net Capacity <u>Factor</u>
Unit 1	40	720	86	61,920	0.06%
Unit 2	(1)	720	86	61,920	0.00%
Unit 3	66	720	86	61,920	0.11%
Unit 4	177	720	86	61,920	0.29%
Unit 5	29	720	86	61,920	0.05%
Unit 6	<u>188</u>	<u>720</u>	86	<u>61,920</u>	<u>0.30%</u>
Total	499	4,320	86	371,520	0.13%

December 2019

Woodsdale <u>Station</u>	Net <u>MWH</u>	Period <u>Hours</u>	MW <u>Rating</u>	MW <u>Hours</u>	Net Capacity <u>Factor</u>
Unit 1	(9)	744	94	69,936	-0.01%
Unit 2	(80)	744	94	69,936	-0.11%
Unit 3	(64)	744	94	69,936	-0.09%
Unit 4	(35)	744	94	69,936	-0.05%
Unit 5	197	744	94	69,936	0.28%
Unit 6	<u>13</u>	<u>744</u>	94	<u>69,936</u>	<u>0.02%</u>
Total	22	4,464	94	419,616	0.01%

January 2020

Woodsdale <u>Station</u>	Net <u>MWH</u>	Period <u>Hours</u>	MW <u>Rating</u>	MW <u>Hours</u>	Net Capacity <u>Factor</u>
Unit 1	(177)	744	94	69,936	-0.25%
Unit 2	(162)	744	94	69,936	-0.23%
Unit 3	(148)	744	94	69,936	-0.21%
Unit 4	(184)	744	94	69,936	-0.26%
Unit 5	(185)	744	94	69,936	-0.26%
Unit 6	<u>121</u>	<u>744</u>	94	<u>69,936</u>	<u>0.17%</u>
Total	(735)	4,464	94	419,616	-0.18%

February 2020

Woodsdale <u>Station</u>	Net <u>MWH</u>	Period <u>Hours</u>	MW <u>Rating</u>	MW <u>Hours</u>	Net Capacity <u>Factor</u>
Unit 1	125	696	94	65,424	0.19%
Unit 2	143	696	94	65,424	0.22%
Unit 3	136	696	94	65,424	0.21%
Unit 4	87	696	94	65,424	0.13%
Unit 5	88	696	94	65,424	0.13%
Unit 6	<u>(121)</u>	<u>696</u>	94	<u>65,424</u>	<u>-0.18%</u>
Total	458	4,176	94	392,544	0.12%

March 2020

Woodsdale <u>Station</u>	Net <u>MWH</u>	Period <u>Hours</u>	MW <u>Rating</u>	MW <u>Hours</u>	Net Capacity <u>Factor</u>
Unit 1	(128)	744	94	69,936	-0.18%
Unit 2	(116)	744	94	69,936	-0.17%
Unit 3	(134)	744	94	69,936	-0.19%
Unit 4	(140)	744	94	69,936	-0.20%
Unit 5	(127)	744	94	69,936	-0.18%
Unit 6	<u>(106)</u>	<u>744</u>	94	<u>69,936</u>	<u>-0.15%</u>
Total	(751)	4,464	94	419,616	-0.18%

April 2020

Woodsdale <u>Station</u>	Net <u>MWH</u>	Period <u>Hours</u>	MW <u>Rating</u>	MW <u>Hours</u>	Net Capacity <u>Factor</u>
Unit 1	(120)	720	86	61,920	-0.19%
Unit 2	(111)	720	86	61,920	-0.18%
Unit 3	(118)	720	86	61,920	-0.19%
Unit 4	(114)	720	86	61,920	-0.18%
Unit 5	(112)	720	86	61,920	-0.18%
Unit 6	<u>(75)</u>	<u>720</u>	86	<u>61,920</u>	<u>-0.12%</u>
Total	(650)	4,320	86	371,520	-0.17%

PERSON RESPONSIBLE:John Swez
Libbie Miller

Duke Energy Kentucky
Case No. 2020-00249
Staff First Set Data Requests
Date Received: August 19, 2020

STAFF-DR-01-017

REQUEST:

- a. For the period under review, explain whether Duke Kentucky made any changes to its maintenance and operation practices or completed any specific generation efficiency improvements that affect fuel usage at Duke Kentucky's generation facilities.
- b. Describe the impact of these changes on Duke Kentucky's fuel usage.

RESPONSE:

- a. Duke Energy Kentucky made no changes during the period under review to its maintenance and operation practices or completed any specific generation efficiency improvements that affect fuel usage at Duke Energy Kentucky's generation facilities.
- b. N/A

PERSON RESPONSIBLE: John Swez

**Duke Energy Kentucky
Case No. 2020-00249
Staff First Set Data Requests
Date Received: August 19, 2020**

STAFF-DR-01-018

REQUEST:

State whether Duke Kentucky is aware of any violations of its policies and procedures regarding fuel procurement that occurred prior to or during the period under review.

RESPONSE:

Duke Energy Kentucky is not aware of any violations of its policies and procedures regarding fuel procurement that occurred prior to or during the period under review.

PERSON RESPONSIBLE: Brett Phipps

**Duke Energy Kentucky
Case No. 2020-00249
Staff First Set Data Requests
Date Received: August 19, 2020**

STAFF-DR-01-019

REQUEST:

State whether Duke Kentucky is aware of any violations of 807 KAR 5:056 that occurred prior to or during the period under review.

RESPONSE:

Duke Energy Kentucky is not aware of any instances where it may have violated 807 KAR 5:056 either prior to or during the period under review.

PERSON RESPONSIBLE: Brett Phipps

Duke Energy Kentucky
Case No. 2020-00249
Staff First Set Data Requests
Date Received: August 19, 2020

STAFF-DR-01-020

REQUEST:

State whether all fuel contracts related to commodity and transportation have been filed with the Commission. If any contracts have not been filed, explain why they have not been filed and provide a copy.

RESPONSE:

Coal:

All contracts for long-term and short-term (spot) coal and transportation agreements have been filed with the Commission.

Natural Gas:

All contracts for natural gas and gas transportation contracts have been filed with the commission.

Fuel Oil:

The Hightower 12th, 13th, amendments and new master agreement dated February 15, 2019, May 1, 2019, and April 30, 2020 respectively were not forwarded to DEK Legal to be filed with the Commission due to an oversight. Upon determination of the oversight, the contracts were filed on September 1st.

PERSON RESPONSIBLE: Brett Phipps

**Duke Energy Kentucky
Case No. 2020-00249
Staff First Set Data Requests
Date Received: August 19, 2020**

PUBLIC STAFF-DR-01-021

REQUEST:

Refer to 807 KAR 5:056 3(5), which states, “For any contracts entered into on or after December 1, 2019, the commission shall, in determining the reasonableness of fuel costs in procurement contracts and fuel procurement practices, evaluate the reasonableness of fuel costs in contracts and competing bids based on the cost of the fuel less any coal severance tax imposed by any jurisdiction.”

- a. Provide a listing of any new coal contracts entered into on or since December 1, 2019.
- b. For each bid solicitation or potential spot purchases that resulted in a new purchase contract on or after December 1, 2019, provide the bid evaluation sheets that include the coal severance tax rate per ton or MMBTU, as appropriate, being levied.

RESPONSE:

CONFIDENTIAL PROPRIETARY TRADE SECRET (As to Attachment only)

- a./b. For the period under review from November 1, 2019 through April 30, 2020, please see STAFF-DR-01-021 Confidential Attachment.

PERSON RESPONSIBLE: Brett Phipps