Attorney General's First Set Data Requests

Date Received: June 30, 2021

AG-DR-01-027

REQUEST:

Refer to Schedule G-1. The schedule depicts that total jurisdictionally adjusted O&M

payroll costs included in the base year is \$10.222 million and the total jurisdictionally

adjusted O&M payroll costs included in the test year is \$10.942 million. Explain all reasons

why the test year payroll costs are expected to increase over the base year by just over 7%.

If the increase relates to new program costs being included in base rates, please describe

and explain.

RESPONSE:

A correction is needed in the G-1 for the base period payroll tax reported – from \$503,654

to \$668,440 (see table 1 below). With the corrected G-1 data, labor is shown at 5% increase,

instead of 7%, however there are certain nuances to the base period data for these costs.

The base period does not reflect the entire 2020 fiscal year, and in the actuals period of

November/December, there are rate changes and true ups booked to reflect the appropriate

2020 fiscal year actual cost for Incentives, Benefits, and Payroll Taxes. Due to the base

period including 2020 actuals of September to December, which include the true-up

amounts, but not the offsetting lower costs in the earlier months, the comparison for

incentives is skewed.

A better comparison of labor is 2020 fiscal year actuals to the forecasted period

(see table 2 below). This table shows a total increase of 2%, which is comprised of a 3%

inflation increase in labor and corresponding payroll taxes. The change in incentives is due

to a lower than target 2020 payout, while the forecasted period is assumed to payout at target levels. This is all partially offset by a decrease in employee benefit costs.

Table 1	Revised Base	Forecasted Period	% Change
	Period		
Labor	\$7,528,802	\$7,873,364	5%
Incentives	466,530	384,939	-17%
Employee Benefits	1.723,373	2,063,396	20%
Payroll Taxes	668,440	620,302	-7%
Total Payroll Costs	\$10,387,145	\$10,942,001	5%

Table 2	2020 Actual	Forecasted Period	% Change
Labor	\$7,641,244	\$7,873,364	3%
Incentives	295,692	384,939	30%
Employee Benefits	2,162,238	2,063,396	-5%
Payroll Taxes	602,482	620,302	3%
Total Payroll Costs	\$10,701,656	\$10,942,001	2%

PERSON RESPONSIBLE: Abby L. Motsinger

Attorney General's First Set Data Requests

Date Received: June 30, 2021

AG-DR-01-028

REQUEST:

Refer to Schedule G-1. The schedule depicts that total jurisdictionally adjusted O&M

payroll taxes in the base year is \$0.504 million and the total jurisdictionally adjusted O&M

payroll taxes included in the test year is \$0.620 million. Explain all reasons why the test

year payroll taxes are expected to increase over the base year by over 23%. If the increase

relates to new program costs being included in base rates, please describe and explain.

RESPONSE:

Please see response to AG-DR-01-027.

PERSON RESPONSIBLE:

Abby L. Motsinger

Attorney General's First Set Data Requests

Date Received: June 30, 2021

AG-DR-01-029

REQUEST:

Provide a schedule of payroll costs included in 2019, 2020, the base year, and the test year,

broken down between expense, capitalized and other deferred.

RESPONSE:

Below is a schedule of payroll costs for 2019, 2020, the base year and the test year broken

down between expense, capitalized, and other deferred. Payroll has been defined as labor,

incentives, employee benefits, and payroll tax, which is consistent with the G-1. Note that

this schedule represents total gas unadjusted costs, and the Base Year costs reflect a

correction within the O&M line as noted in response to AG-DR-01-027.

	2019	2020	Base Year	Test Year
O&M	\$11,535,877	\$11,145,195	\$11,048,378	\$11,525,358
Capital	9,317,730	9,434,094	9,735,784	10,482,120
Other deferred	1,435,738	1,428,228	1,190,048	1,154,659
Total	\$22,289,345	\$22,007,517	\$21,974,210	\$23,162,137

PERSON RESPONSIBLE:

Abby L. Motsinger

Attorney General's First Set Data Requests

Date Received: June 30, 2021

AG-DR-01-030

REQUEST:

Refer to the bar chart showing levels of O&M costs excluding gas costs from 2010 through

the test year in the Direct Testimony of Ms. Lawler at page 5. Provide a copy of the

workpapers used to populate this bar chart in electronic format with all formulas intact.

RESPONSE:

Please see workpapers contained in AG-DR-01-030 Attachment.

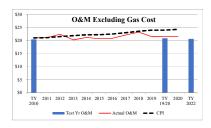
PERSON RESPONSIBLE:

Sarah E. Lawler

															Requested 2018-00261	Order 2018-00261	
		2010 TY	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	TY 19/20 2020	TY 2022	TY 4/19 - 3/20	TY 4/19 - 3/20	TY 2022
	Manufactured Gas Production		\$247,622	\$302,892 302.892	\$208,033 208.033	\$344,868 344.868	\$719,564 719.564	\$963,293	\$1,064,480 1.064.480	\$793,792 793.792	\$1,630,180	\$546,524	\$38,1 38.1				
	Total Production Expense Other Gas Supply Expense		247,622	302,892	208,033	344,868	719,564	963,293	1,064,480	/93,/92	1,630,180	546,524	38,1	37			
801000	Purchased Gas Expense				\$38.854.469				\$34.678.066				*****				
801000	Natural Gas Field Line Purchases Purchased Gas Costs - Unbilled	\$78,939,367 846,223	\$67,656,917 353.063	\$53,561,882 998.371	(1,306,847)	\$48,754,644 (2.839.136)	\$61,360,267 (1,533,801)	\$40,598,667 1.011.153	(2.066.943)	\$37,161,991 86.609	\$43,836,135 (829,789)	\$34,951,370 3.011.176	\$29,344,8 (2,714,3		\$36,334,092 80.549	\$36,334,092	\$41,187,448
807000	Gas Purchased Expense	589,496	511,819	426,221	418,241	482,030	579,080	428,782	378,922	430,480	672,466	538,594	515,3		444,020		565,774
813000	Other Gas Supply Expense	-	,	,		1,309,849	1,043,049	964,793	875,719	523,005	96,587	,	,-		,		,
	Total Other Gas Supply Expense	\$80,375,086	\$68,769,421	\$55,289,366	\$38,173,896	\$48,052,255	\$62,168,159	\$43,966,688	\$34,930,244	\$38,995,877	\$45,405,579	\$39,047,664	\$27,183,9	19	\$36,858,661	\$36,334,092	\$41,036,376
844.1	Liquefied Natural Gas Terminaling & Processing Operation Suppervision and Engineering											\$50,999					
850000	Transmission Expense Other Operation and Supervision									481	1.944	2.878	3.0	67			
859000	Other Expense		\$13,010	\$68,606	\$0	\$0	\$190	\$6,490	\$6,885	\$2,235	\$5,335	\$13,269	\$12,5			\$0	\$16,066
863000	Maintenance of Mains Distribution Expenses											\$412,271	\$188,0	34		\$0	\$519,786
870000	Operation Supervision and Engineering	\$100.536	\$9.334	\$9.376	\$2,276	\$11.975	\$78.111	\$112.057	(\$1,491)								
871000	Load Dispatching	94,425	59,334 145,842	176,867	182,919	195,057	209,998	192,263	191,978	155,692	144,122	271,473	224,4	66	185,332	185,332	258,339
874000	Mains and Services	1,643,396	1,715,933	1,828,624	2,943,249	2,275,639	2,526,753	2,965,174	2,608,224	2,596,130	2,226,936	1,902,184	1,680,4	94	2,548,186	2,712,907	1,278,003
875000	Measuring and Reg. Stations - General	30,483	32,028	5,355	1,184	2,537	6,289	1,586	69,269	1,523	10,954	166,389	135,7				175,613
876000	Measuring and Reg. Stations - Industrial	236,847	31,911	38,197	43,871	35,509	39,835	15,648	40,548	20,754	26,394	59,203	16,8				(10,975
878000 879000	Meters and House Regulators Customer Installations	183,835 945,910	186,972 1,154,549	474,720 1,239,450	801,200 1,280,145	1,037,024 1,402,870	2,539,145 1,931,827	1,085,154 947,329	1,116,219 1,340,845	2,448,922 1,264,352	1,710,760 1,147,331	1,499,223 994.614	1,345,0 1,471,9		2,305,785 1,353,005	1,965,785 1,353,005	620,320 1,294,237
880000	Other Expenses	495,039	589,369	630,468	547,749	734,135	773,891	1,476,730	2,619,290	2,597,986	1,925,239	2,537,191	1,471,3		2,398,505	2,663,658	2,895,460
881000	Rents Interco	400,250	387,624	161,510	347,743	754,133	773,031	1,470,730	2,019,230	2,337,300	1,323,233	2,337,131	1,730,1	03	2,336,303	2,003,030	2,033,400
	Total Operation Maintenance	\$4,130,721	\$4,253,562	\$4,564,567	\$5,802,593	\$5,694,746	\$8,105,849	\$6,795,941	\$7,984,882	\$9,085,359	\$7,191,736	\$7,430,277	\$6,610,7	01	\$8,790,813	\$8,880,687	\$6,510,997
885000	Supervision and Engineering	\$28,864	\$24,493	\$38,525	\$48,352	\$97,008	\$56,010	\$86,031	(\$2,635)								
887000 889000	Mains Measuring and Regulating Stations - General	985,106 56,787	477,915 46,549	403,553 26,019	590,849 44,238	701,922 82,784	790,001 45,914	702,408 39,908	761,041 45,377	922,883 47,473	1,456,656 33,567	1,266,672 60,387	892,9 51,6		2,158,350 66,190	2,158,350 66,190	1,128,603 34,344
890000	Measuring and Regulating Stations - Industrial	30,767	8,490	1.925	4,873	4.139	6.117	3,977	1.097	47,473	33,307	00,387		59	00,130	00,130	34,344
892000	Services	708,338	758,115	848,507	652,379	592,670	733,022	625,693	400,857	759,836	723,645	732,439	676,7		596,174	596,174	647,372
893000	Meters	8,806	294,785	249,858	244,363	192,215	354,154	301,184	543,580	284,008	462,658	215,258	207,3		277,999	277,999	17,493
894000	Other	24,240	19,116	49,415	33,601	22,158	23,265	25,279	45,930	5,825	(54,236)	75,241	208,6		52,951	52,951	(24,928
	Total Maintenance Total Distribution Expenses	1,812,141 \$5,942,862	1,629,463 \$5,883,025	1,617,802 \$6,182,369	1,618,655 \$7,421,248	1,692,896 \$7,387,642	2,008,483 \$10,114,332	1,784,480 \$8,580,421	1,795,247 \$9,780,129	2,020,025 \$11,105,384	2,622,290 \$9,814,026	2,349,997 \$9,780,274	2,038,3 \$8,649,0		3,151,664 \$11,942,477	3,151,664 \$12,032,351	1,802,884 \$8,313,881
	Customer Accounts Expense	\$5,942,862	\$5,883,025	\$6,182,369	\$7,421,248	\$7,387,642	\$10,114,332	\$8,580,421	\$9,780,129	\$11,105,384	\$9,814,026	\$9,780,274	\$8,649,0	19	\$11,942,477	\$12,032,351	\$8,313,881
901000	Supervision & Engineering	\$0	\$569	\$282	\$0	\$130	\$32,802	\$43,817	\$404,392	\$587,612	\$412,906	\$223,943	\$199,8	55	\$185,894	\$185,894	\$187,499
902000	Meter Reading Expense	777,488	661,780	659,485	693,459	682,775	514,255	710,370	618,439	467,970	295,335	37,775	19,1		15,923	15,923	950
903000	Customer Records & Collections	1,936,912	2,970,386	3,257,712	2,803,957	2,535,317	2,676,423	2,589,591	2,798,436	2,568,495	2,842,101	2,883,797	2,706,1		2,595,599	1,987,035	3,961,111
904000	Uncollectible Accounts	1,403,255	925,196	925,068	547,638 21	374,134 111	297,865 378	242,191 757	185,695 318	3,920 314	8,111 265	4,920 482	6,8	56 88	378,591 105.421	378,591	205,232
905000	Cust Reltns Billg & Coll-Gas Total Customer Accounts Expense	\$4,117,655	\$4,557,931	\$4,842,547	\$4,045,075	\$3,592,467	\$3,521,723	\$3,586,726	\$4,007,280	\$3,628,311	\$3,558,718	\$3,150,917	\$2,932,2		\$3,281,428	105,421 \$2,672,864	\$4,354,792
	Customer Services & Information Expense	Ç4,117,033	Ç4,557,551	\$4,04 <u>2,</u> 347	\$4,043,073	\$3,332,407	J J,J21,723	\$3,300,720	\$4,007,200	\$3,020,311	<i>43,330,710</i>	43,130,31	<i>\$2,332,</i> 2		93,202,420	\$2,072,004	\$4,554,75E
908000	Customer Assistance	\$159,070	\$138,390	\$132,457	\$133,191	\$130,093	\$157,313	\$157,153	\$166,854	\$139,343	\$162,535	\$168,784	\$106,4	50	\$105,903	\$85,308	\$157,038
909000	Information and Instructional Advertising	-	13,140	3,923	9,468	8,963	5,456	3,594	200	1,310	3,847	4,636	1,7				
910000	Misc Cust Serv and Info - Gas Total Customer Services & Info Expense	373,459 \$532,529	982,628 \$1,134,158	1,330,567 \$1,466,947	1,210,948 \$1,353,607	933,451 \$1,072,507	625,453 \$788,222	471,707 \$632,454	338,705 \$505,759	310,786 \$451.439	248,950 \$415,332	252,632 \$426,052	178,1 \$286.3		320,933 \$426,836	320,933 \$406.241	231,972 \$389,010
	Sales Expense	\$532,529	\$1,134,158	\$1,466,947	\$1,353,607	\$1,072,507	\$788,222	\$632,454	\$505,759	\$451,439	\$415,332	\$426,052	\$286,3	ьь	\$426,836	\$406,241	\$389,010
911000	Supervision	\$0	\$0	\$2,301	(\$1,404)					\$19	\$468	\$9			\$20,643	\$20,643	
912000	Demonstration & Selling Expense	-	75	27	3,410	1	201,746	114,357	90,223	99,009	164,756	205,077	243,8	95	173,485	173,485	399,560
913000	Advertising Expense		12,557	34,826	25,343	16,392	7,119	490	3,768	7,303	6,084	3,965	2,6	01	6,339		
916000	Misc. Sales Expense														****		
	Total Sales Expense Administrative & General Expense Operation	\$0	\$12,632	\$37,154	\$27,349	\$16,393	\$208,865	\$114,847	\$93,991	\$106,331	\$171,308	\$209,051	\$246,4	96	\$200,467	\$194,128	\$399,560
920000	Administrative & General Salaries	\$2,607,552	\$3,010,311	\$2,023,847	\$2,554,894	\$1,620,342	\$1,632,452	\$2,182,998	\$1,910,444	\$1,750,117	\$2,980,149	\$2,668,810	\$2,255,2		\$2,190,228	\$1,601,024	\$1,594,986
921	Office Supplies & Expenses	1,353,416	1,368,441	1,479,614	1,431,640	1,237,400	923,272	1,054,946	908,525	1,014,537	1,223,848	1,275,555	1,414,5	66	999,204	930,296	1,626,098
922 923000	(Less) Admin Exepenses Transferred - Credit	1.904.139	10 1.265.096	(110) 1.332.913	(50) 1,289,206	(8) 1.107.981	-	883.801	(475) 536.163	(331) 1.092.343	(150)	(126) 818.508	2.580.0	**	461.280	456,274	504.030
923000	Outside Services Employed Property Insurance	1,904,139	1,265,096	210,573	1,289,206	1,107,981	1,042,364 168,422	158,576	129,250	1,092,343	2,155,791 56,754	818,508 53,534	2,580,0		461,280	456,274 61,536	504,920 67,200
925000	Injuries & Damages	103.662	105.968	136.517	175.019	152,048	54.082	463,576	513.100	423,476	166.823	133.820	108.9		90.396	90.396	140,600
926	Employee Pension & Benefits	1,243,304	2,288,199	2,372,491	2,589,141	2,807,898	2,135,551	2,468,507	1,642,940	1,815,518	2,044,715	1,797,684	2,162,3	01	2,381,447	1,574,167	2,036,660
928000	State Reg. Commission Expense	590,384	624,440	284,622	261,390	181,122	180,171	216,289	218,031	194,195	186,988	232,005	252,9		203,247	318,347	308,328
929010	(Less) Duplicate Charges-Credit	(6,043)	186,583	247,938	204,857	78,937	222,852	193,419	270,461	266,488	296,254	269,830	159,4		11,725	11,725	151,080
930100 930200	General Advertising Expenses Misc Advertising Expenses	116,979	7,126 190.691	5,727 201.211	4,937 510.343	1,909 459.926	25,759 186,059	10,716 119,097	7,162 323,575	8,689 215.142	27,271 334.441	21,129 300.826	17,1 589.6		38,844 512,097	506 309	140.728
931000	Rents	1,205,621	483,223	679,221	747,115	530,832	455,680	413,324	574,016	439,855	357,830	392,728	355,5		37,222	33,103	380,151
	Total Operation Maintenance	\$9,262,518	\$9,296,464	\$8,478,908	\$9,511,388	\$8,171,402	\$6,580,960	\$7,778,411	\$6,493,220	\$6,815,967	\$9,238,506	\$7,424,895	\$9,633,5		\$6,963,776	\$5,559,727	\$6,648,591
932000	Maintenence of General Plant Total Administrative & General	\$610,973 \$9,873,491	\$134,034 \$9,430,498	\$56,000 \$8,534,908	\$49,705 \$9,561,093	\$17,184 \$8,188,586	\$2,852 \$6,583,812	\$7,684 \$7,786,095	\$5,666 \$6,498,886	\$2,527 \$6,818,494	\$14,933 \$9,253,439	\$78,906 \$7,503,801	(\$328,3 \$9,305,1		\$97 \$6,963,873	\$97 \$5,559,824	\$1,260 \$6,649,851
407	Amortization Expense (Not in FERC Form 2 for O&M to	otal, but present in Sch	n C-2)													322,346	407,760
	Total Operating Expense	\$100,841,623	\$89,800,675	\$76,421,897	\$60,582,268	\$68,309,850	\$83,385,303	\$64,673,721	\$55,823,174	\$61,108,552	\$68,625,681	\$60,597,176	\$48,806,9	09	\$59,673,742	\$57,199,500	\$61,679,322
					, , ,	, , ,	700,000,000	\$04,075,7EI	V33,023,174	301,100,33L	\$00,023,001	\$00,557,270	+		400/010/110		

Source: FERC Form 2, pages 317-325.

Transmission Expense	\$0	\$13,010	\$68,606	\$0	\$0	\$190	\$6,490	\$6,885	\$2,716	\$7,279	\$428,418	\$0	\$203,686		\$0	\$0	\$535,852
Distribution Expense	\$5,942,862	\$5,883,025	\$6,182,369	\$7,421,248	\$7,387,642	\$10,114,332	\$8,580,421	\$9,780,129	\$11,105,384	\$9,814,026	\$9,780,274		\$8,649,019		\$11,942,477	\$12,032,351	\$8,313,881
Customer Accounts Expense	4,117,655	4,557,931	4,842,547	4,045,075	3,592,467	3,521,723	3,586,726	4,007,280	3,628,311	3,558,718	3,150,917		2,932,224		3,281,428	2,672,864	4,354,792
Customer Service & Information Expense	532,529	1,134,158	1,466,947	1,353,607	1,072,507	788,222	632,454	505,759	451,439	415,332	426,052		286,366		426,836	406,241	389,010
Sales Expense	-	12,632	37,154	27,349	16,393	208,865	114,847	93,991	106,331	171,308	209,051		246,496		200,467	194,128	399,560
Administrative & General Expense	9,873,491	9,430,498	8,534,908	9,561,093	8,188,586	6,583,812	7,786,095	6,498,886	6,818,494	9,253,439	7,503,801		9,305,199		6,963,873	5,559,824	6,649,851
Total O&M Expense	\$20,466,537	\$21,031,254	\$21,132,531	\$22,408,372	\$20,257,595	\$21,217,144	\$20,707,033	\$20,892,930	\$22,112,675	\$23,220,102	\$21,498,513	\$0	\$21,622,990		\$22,815,081	\$20,865,408	\$20,642,946
Actual O&M	20.466537	21.031254	21.132531	22.408372	20.257595	21.217144	20.707033	20.89293	22.112675	23.220102	21.498513	21.5607515	21.62299		22.815081	20.865408	20.642946
Test Year O&M		20.466537										20.865408		20.642946			
	7	*Note 1									*N	lote 2					
CPI Rate		1.0000000	1.031565286	1.052913013	1.068335657	1.085666067	1.086954727	1.100666801	1.124114906	1.151571156	1.172437356	1.172437356	1.18690153				
CPI		21.031254	21.11256909	21.54948314	21.86513125	22.21982474	22.24619914	22.52683781	23.00673932	23.56867367	23.99573252	23.99573252	24.29176408				



Note 1: For charting presentation purposes, TY 2010 0&M total moved to calendar year 2010 column, (E102 moved to F103)

Note 2: To prevent chart from showing \$0 for Actual 0&M and CPI adjusted amount for the TY period between calendar years 2019 and 2020, averaged prior and next years.

Top Picks (Most Requested Statistics): U.S. Bureau of Labor Statistics (bls.gov)

CPI for All Urban Consumers (CPI-U) Original Data Value

Series Id: CUUR0000SA0

Not Seasonally Adjusted

Series Title: All items in U.S. city average, all urban consumers,

 Area:
 U.S. city average

 Item:
 All items

 Base Period:
 1982-84=100

 Years:
 2010 to 2021

Yea	ar Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Annual	HALF1	HALF2	Change in Annual	Rate	Rate (1+R)
2010	216.687	216.741	217.631	218.009	218.178	217.965	218.011	218.312	218.439	218.711	218.803	219.179	218.056	217.535	218.576	0.000	0	1.000000
2011	220.223	221.309	223.467	224.906	225.964	225.722	225.922	226.545	226.889	226.421	226.230	225.672	224.939	223.598	226.280	6.883	0.031565286	1.031565
2012	226.665	227.663	229.392	230.085	229.815	229.478	229.104	230.379	231.407	231.317	230.221	229.601	229.594	228.850	230.338	11.538	0.052913013	1.052913
2013	230.280	232.166	232.773	232.531	232.945	233.504	233.596	233.877	234.149	233.546	233.069	233.049	232.957	232.366	233.548	14.901	0.068335657	1.068336
2014	233.916	234.781	236.293	237.072	237.900	238.343	238.250	237.852	238.031	237.433	236.151	234.812	236.736	236.384	237.088	18.680	0.085666067	1.085666
2015	233.707	234.722	236.119	236.599	237.805	238.638	238.654	238.316	237.945	237.838	237.336	236.525	237.017	236.265	237.769	18.961	0.086954727	1.086955
2016	236.916	237.111	238.132	239.261	240.229	241.018	240.628	240.849	241.428	241.729	241.353	241.432	240.007	238.778	241.237	21.951	0.100666801	1.100667
2017	242.839	243.603	243.801	244.524	244.733	244.955	244.786	245.519	246.819	246.663	246.669	246.524	245.120	244.076	246.163	27.064	0.124114906	1.124115
2018	247.867	248.991	249.554	250.546	251.588	251.989	252.006	252.146	252.439	252.885	252.038	251.233	251.107	250.089	252.125	33.051	0.151571156	1.151571
2019	251.712	252.776	254.202	255.548	256.092	256.143	256.571	256.558	256.759	257.346	257.208	256.974	255.657	254.412	256.903	37.601	0.172437356	1.172437
2020	257.971	258.678	258.115	256.389	256.394	257.797	259.101	259.918	260.280	260.388	260.229	260.474	258.811	257.557	260.065	40.755	0.18690153	1.186902
2021	261.582	263.014	264.877															

Attorney General's First Set Data Requests

Date Received: June 30, 2021

AG-DR-01-031

REQUEST:

Provide a schedule of the amortization expense and remaining balance associated with each

regulatory asset and each regulatory liability for each month for the years 2018 through

2020, for each actual month during 2021, and for each month projected for the remainder

of 2021 and continuing through the end of the test year. In addition, provide the

amortization period and the Case No. in which the Commission approved the recovery and

the amortization period, if any. If there was no regulatory asset and/or no regulatory

liability amortization in the years prior to the test year and the amortization expense in the

test year relates only to new deferrals for which recovery is requested in this case, so state.

RESPONSE:

Please see AG-DR-01-031 Attachment.

PERSON RESPONSIBLE:

Jay P. Brown

DUKE ENERGY KENTUCKY, INC. Regulatory Asset Amortizations

KyPSC Case No. 2021-00190 AG-DR-01-031 Attachment Page 1 of 3

DEK Regulatory Assets being amortized

Account #	Account <u>Description</u>	<u>Case No.</u>	Amortization <u>Period</u>	Monthly Amortization <u>Expense</u>
0186028	DEK 2018 Gas Rate Case Exp	KPSC Case No. 2018- 00261	05/19 - 03/24	\$ 4,253
0182715	Integrity Management	KPSC 2018-00261; KPSC 2016-00152	04/19 - 03/29	\$ 29,727

400AM802 DEK Deferred Rate Case Expense Amortization Per DEK Case No. 2018-00261 (4/1/2019)

Authorized Amount to Recover (includes carrying cost of 4.36%) 04/19 - 03/24

\$ 2,887,115 (Acct 0182715) beginning April 1, 2018

Amorti	zation Schedule		Monthly Amortization	Carrying Costs Acct 0182715	Total		Net Balance
Amorti	Beg Bal		Amortization	ACCI 0102713	I Otal		2,887,115
1	Apr-19	\$	29,727	(10,490)	\$ 19,23		2,867,878
2	May-19	\$	29,727	(10,420)			2,848,571
3	Jun-19	\$	29,727	(10,350)			2,829,193
4	Jul-19	\$	29,727	(10,330)			2,809,745
5	Aug-19	\$	29,727	(10,209)			2,790,227
6	Sep-19	\$	29,727	(10,209)	\$ 19,5		2,770,638
7	Oct-19	\$ \$	29,727	(10,136)	\$ 19,56		2,770,036
8	Nov-19	Ψ ¢	29,727	, ,	\$ 19,73		2,730,977
9	Dec-19	\$ \$	29,727	(9,923)			2,731,243
10	Jan-20	\$	29,727	, ,	\$ 19,8		2,691,565
11	Feb-20	\$	29,727	, ,	\$ 19,0		2,671,617
12	Mar-20	\$	29,727	(9,707)	\$ 20,02		2,651,597
13	Apr-20	\$	29,727	(9,634)			2,631,597
14	May-20	Φ	29,727	(9,561)			2,611,338
15	Jun-20	\$ \$	29,727 29,727				
16	Jul-20 Jul-20	Φ	29,727 29,727	(9,488) (9,414)			2,591,099 2,570,786
17	Aug-20	\$ \$	29,727	(9,341)	\$ 20,3		2,550,400
18	Sep-20	\$ \$, ,			
19	Oct-20	Φ	29,727 29,727	(9,266) (9,192)	\$ 20,46 \$ 20,53		2,529,939 2,509,404
20	Nov-20	φ Φ	29,727		\$ 20,50		2,488,795
21	Dec-20	Φ	29,727	(9,043)			2,468,111
22	Jan-21	\$ \$ \$	29,727	(8,967)	\$ 20,76		2,447,352
23	Feb-21	\$	29,727	(8,892)	\$ 20,76		2,447,552
24	Mar-21	\$	29,727	(8,816)	\$ 20,0		2,420,510
25	Apr-21		29,727	(8,740)			2,403,600
26		\$ \$ \$	29,727	(8,664)			, ,
27	May-21 Jun-21	Φ	29,727	(8,588)			2,363,556 2,342,417
28	Jul-21 Jul-21	\$	29,727	(8,511)			2,342,417
		Φ					
29 30	Aug-21	\$	29,727	(8,434)			2,299,907
	Sep-21	\$	29,727	(8,356)			2,278,536
31 32	Oct-21 Nov-21	\$ \$	29,727 29,727	(8,279) (8,201)	\$ 21,44 \$ 21,52		2,257,088 2,235,561
33	Dec-21	\$, ,			
33 34	Jan-22	Φ	29,727 29,727	(8,123) (8,044)			2,213,957 2,192,274
34 35	Feb-22	\$ \$, ,			
36		Φ	29,727	(7,965)	1		2,170,512
30 37	Mar-22	\$ \$	29,727	(, ,	1		2,148,671
	Apr-22	φ	29,727	(7,807)	\$ 21,92		2,126,751
38 39	May-22	\$ \$	29,727	(7,727)	\$ 22,00		2,104,751
39 40	Jun-22	ф Ф	29,727	, ,			2,082,671
	Jul-22	\$	29,727	(7,567)	\$ 22,10		2,060,511
41	Aug-22	\$	29,727	(7,487)	\$ 22,24		2,038,271
42	Sep-22	\$	29,727	, ,	\$ 22,32		2,015,950
43	Oct-22	\$	29,727	(7,325)	\$ 22,40		1,993,548
44 45	Nov-22	\$ \$	29,727	(7,243)	\$ 22,48		1,971,064
40	Dec-22	Φ	29,727	(7,162)	\$ 22,56)O \$	1,948,499

45

Dec-22

68,042.07

4,252.60

63,789.47

186,940.18

Z400A802 DEK Deferred Rate Case Expense Amortization Per DEK Case No. 2018-00261 (4/1/2019)

Authorized Amount to Recover: \$\,_250,729.65 \quad \text{(Acct 0182028) beginning April 1, 2019}

04/19 - 03/24

Amortization Schedule Beginning **Current Month** Reclass **Late New Activity** Accrued **Ending Period Balance Amortization** (subtract from balance) (add to balance) **Amortization Balance** 250,234.49 1 Apr-19 2 May-19 250,234.49 4,241.26 221.60 4,241.26 245,771.63 3 Jun-19 4,211.88 240,077.40 245,771.63 1,482.35 8,453.14 4 Jul-19 240,077.40 4,211.88 12,665.02 235,865.52 5 Aug-19 235,865.52 4,211.88 16,876.90 231,653.64 21,088.78 6 Sep-19 231,653.64 4,211.88 2.199.11 229,640.87 7 Oct-19 229,640.87 4,252.60 25,341.38 225,388.27 8 Nov-19 221,135.67 225,388.27 4,252.60 29.593.98 9 Dec-19 221,135.67 4,252.60 33,846.58 216,883.07 10 Jan-20 216,883.07 4,252.60 38,099.18 212,630.47 11 Feb-20 212.630.47 4.252.60 42.351.78 208,377.87 12 Mar-20 208,377.87 4,252.60 46.604.38 204,125.27 50,856.98 199,872.67 Apr-20 4,252.60 13 204,125.27 14 May-20 199,872.67 4,252.60 55,109.58 195,620.07 15 Jun-20 195,620.07 4,252.60 59,362.18 191,367.47 187,114.87 16 Jul-20 191,367.47 4,252.60 63,614.78 17 Aug-20 187,114.87 4,252.60 67,867.38 182,862.27 18 Sep-20 182,862.27 4,252.60 72,119.98 178,609.67 19 Oct-20 178,609.67 4,252.60 76,372.58 174,357.07 170,104.47 174,357.07 4,252.60 80,625.18 20 Nov-20 170,104.47 21 Dec-20 4,252.60 84,877.78 165,851.87 89,130.38 22 Jan-21 165,851.87 4,252.60 161,599.27 23 Feb-21 161.599.27 4,252.60 93,382.98 157,346.67 24 Mar-21 157,346.67 4,252.60 97,635.58 153,094.07 25 Apr-21 153,094.07 4,252.60 101,888.18 148,841.47 26 May-21 148,841.47 4,252.60 106,140.78 144,588.87 27 Jun-21 144,588.87 4,252.60 110,393.38 140,336.27 28 Jul-21 140,336.27 4.252.60 114,645.98 136,083.67 29 Aug-21 136,083.67 4,252.60 118,898.58 131,831.07 30 Sep-21 131,831.07 4,252.60 123,151.18 127,578.47 127,403.78 31 Oct-21 127,578.47 4,252.60 123,325.87 131,656.38 32 Nov-21 123,325.87 4,252.60 119,073.27 33 Dec-21 119.073.27 4.252.60 135.908.98 114.820.67 34 Jan-22 114,820.67 4,252.60 140,161.58 110,568.07 35 4,252.60 144,414.18 Feb-22 110,568.07 106,315.47 36 Mar-22 106,315.47 4,252.60 148,666.78 102,062.87 37 Apr-22 102,062.87 4,252.60 152,919.38 97,810.27 38 May-22 97,810.27 4,252.60 157,171.98 93,557.67 39 Jun-22 93,557.67 4,252.60 161,424.58 89,305.07 40 Jul-22 89,305.07 4,252.60 165,677.18 85,052.47 41 Aug-22 85,052.47 4,252.60 169,929.78 80,799.87 42 Sep-22 80,799.87 4,252.60 174,182.38 76,547.27 43 Oct-22 76,547.27 4,252.60 178,434.98 72,294.67 44 Nov-22 72,294.67 4,252.60 182,687.58 68,042.07

Attorney General's First Set Data Requests

Date Received: June 30, 2021

AG-DR-01-032

REQUEST:

Refer to the Direct Testimony of Mr. Panizza at page 6 in regards to EDIT. Provide a

schedule showing the original computed EDIT amounts by FERC account and temporary

difference as of December 31, 2017, protected and unprotected, both by temporary

difference, the monthly activity since then through the end of test year showing monthly

non-amortization additions and subtractions to each, and reductions due to monthly

amortizations of each. Provide in electronic format with all formulas intact.

RESPONSE:

Please see AG-DR-01-032 Attachment, page 1 for the federal protected and unprotected

balances as of December 31, 2017 and the monthly activity through the end of the test year.

Please see AG-DR-01-032 Attachment, page 2 for the state unprotected balances as of

December 31, 2017 and the monthly activity through the end of the test year.

Please see AG-DR-01-032 Attachment, page 3 for the schedule showing the original

federal EDIT amounts by FERC account and temporary difference as of December 31,

2017.

PERSON RESPONSIBLE:

John R. Panizza

EDIT:	Protected	Unprotected PP&E	Unprotected Non PP&E
Estimate As Of 12/31/2017	(31,411,585)	(592,741)	288,377
2018 Return True Up	(936,114)	-	32,776
2018 PP&E True Up	(113,151)	164,326	-
Protected to unprotected mvmt	307,747	(307,747)	-
Total EDIT To Be Amortized	(32,460,850)	(428,415)	321,153

	Protected EDIT	Amortization Of	Amortization Of Unprotected Non PP&E	
	Amortization	Unprotected EDIT	EDIT	
Jan-18	30,775	(30,775)		
Feb-18 Mar-18	30,775 30,775	(30,775) (30,775)		
Apr-18	30,775	(30,775)		
May-18	30,775	(30,775)		
Jun-18	30,775	(30,775)		
Jul-18 Aug-18	30,775 30,775	(30,775) (30,775)		
Sep-18	30,775	(30,775)		
Oct-18	30,775	(30,775)		
Nov-18	30,775	7,504	(2,676)	
Dec-18 Balance	30,775 (32,091,553)	2,375 (726,283)	(2,130) 316,347	
Jan-19 Feb-19	61,549	9,879	(4,806)	_
Mar-19	30,775	4,940	(2,403)	
Apr-19	30,775	4,940	(2,403)	
May-19	30,775	4,940	(2,403)	
Jun-19	30,775	4,940	(2,403)	
Jul-19 Aug-19	30,775 30,775	4,940 4,940	(2,403) (2,403)	
Aug-19 Sep-19	30,775	4,940 4,940	(2,403)	
Oct-19	30,775	4,940	(2,403)	
2018 True ups (Booked in Nov. 19 - RTP Dataset)	(161,268)	-	134,390.34	
Nov-19	(117,055)	4,940	(2,403)	
Dec-19 Balance	17,336 (32,044,793)	4,940 (667,009)	(2,403) 421,899	
Jan-20	17,336	4,939	(2,403)	_
Feb-20	17,336	4,939	(2,403)	
Mar-20	17,336	4,939	(2,403)	
Apr-20 May-20	17,336 17,336	4,939 4,939	(2,403) (2,403)	
Jun-20	17,336	4,939	(2,403)	
Jul-20	17,336	4,939	(2,403)	
Aug-20	17,336	4,939	(2,403)	
Sep-20	17,336	4,939	(2,403)	
Oct-20 Nov-20	17,336 17,336	4,939 4,939	(2,403) (2,403)	
2019 ARAM True ups booked in RTP dataset	189,353	-	(2,403)	
2020 EDIT Estimate Adj. included - 12/1/2020	409,307	4,939	(2,403)	
Balance	(31,255,441)	(607,739)	393,062	<u></u>
Jan-21	50,000	4,939	(2,403)	
Feb-21 Mar-21	50,000 50,000	4,939 4,939	(2,403) (2,403)	
Apr-21	50,000	4,939	(2,403)	
May-21	50,000	4,939	(2,403)	
Jun-21	50,000	4,939	(2,403)	
Jul-21	50,000	4,939	(2,403)	
Aug-21 Sep-21	50,000 50,000	4,939 4,939	(2,403) (2,403)	
Oct-21	50,000	4,939	(2,403)	
Nov-21	50,000	4,939	(2,403)	
Dec-21	50,000	4,939	(2,403)	Projected EDIT Amortization for 202
Balance Jan-22	(30,655,441)	(548,469)	364,224 (2,403)	(184,245) (181,709)
Feb-22	50,000	4,939	(2,403)	(179,173)
Mar-22	50,000	4,939	(2,403)	(176,637)
Apr-22	50,000	4,939	(2,403)	(174,101)
May-22	50,000	4,939	(2,403)	(171,565)
Jun-22 Jul-22	50,000 50,000	4,939 4,939	(2,403) (2,403)	(169,029) (166,493)
Aug-22	50,000	4,939	(2,403)	(163,957)
Sep-22	50,000	4,939	(2,403)	(161,421)
		4.020	(2.402)	(150,005)
Oct-22	50,000	4,939	(2,403)	(158,885)
Oct-22 Nov-22 Dec-22	50,000 50,000 50,000	4,939 4,939 4,939	(2,403) (2,403) (2,403)	(158,885) (156,349) (153,813)

Duke Energy Kentucky State EDIT

		Ta	x Rates
		BS	4.97%
		FBOS	-1.04%
		Fed	21.00%
		Net Fed	19.96%
		Combined Rate	24.93%
		Grossup Factor	1.3320034
	Gas - SEDIT	1	
Base EDIT	(606,758)		
Dec-19	45,507		
Balance	(561,251)		
Jan-20	5,056		
Feb-20	5,056		
Mar-20	5,056		
Apr-20	5,056		
May-20	5,056		
Jun-20	5,056		
Jul-20	5,056		
Aug-20	5,056		
Sep-20	5,056		
Oct-20	5,056		
Nov-20	5,056		
Dec-20	5,056		
Balance	(500,575)		
Jan-21	5,056		
Feb-21	5,056		
Mar-21	5,056		
Apr-21	5,056		
May-21	5,056		
Jun-21	5,056		
Jul-21	5,056		
Aug-21	5,056		
Sep-21	5,056		
Oct-21	5,056		
Nov-21	5,056		
Dec-21	5,056	GAS SEDIT 13 Moth Avg	Ţ .
Balance	(439,900)	(439,900)	
Jan-22	5,056	(434,843)	
Feb-22	5,056	(429,787)	
Mar-22	5,056	(424,731)	
Apr-22	5,056	(419,674)	
May-22	5,056	(414,618)	
Jun-22	5,056	(409,562)	
Jul-22	5,056	(404,505)	
Aug-22	5,056	(399,449)	
Sep-22	5,056	(394,393)	
Oct-22	5,056	(389,336)	
Nov-22	5,056	(384,280)	
Dec-22	5,056	(379,224)	
Balance	(379,224)	(409,562)	

2/1/2018 1:20:37 PM

DEC

Balances Report - 2017.12SEC, DE Kentucky Gas

Code	Name	Rate Change
190001/2	ADIT: Prepaid: Taxes	
T11A02	Bad Debts - Tax over Book	(2,447) Unprotected
T11B16	OFFSITE GAS STORAGE COSTS	(237,223) Unprotected
T13B08	ASSET RETIREMENT OBLIGATION	(979,010) Unprotected
T13B19	Leased Meters - Elec & Gas	(53,459) Unprotected
T15A95	Unamortized Debt Premium	975 Unprotected
T17A02	Accrued Vacation	(89,406) Unprotected
T17A54	MGP Sites	(88,815) Unprotected
T19A89	GAS SUPPLIER REFUNDS	56,202 Unprotected
T19A94	UNBILLED REVENUE - FUEL	(29,122) Unprotected
T20C02	Demand Side Management (DSM) Defer	(280,285) Unprotected
T22A28	Retirement Plan Expense - Underfunded	(307,370) Unprotected
T22A29	Non-qualified Pension - Accrual	(4,833) Unprotected
T22A30	Retirement Plan Funding - Underfunded	2,866 Unprotected
T22E02	OPEB Expense Accrual	(166,784) Unprotected
T22E06	FAS 112 Medical Expenses Accrual	(26,278) Unprotected
Total 190001/2		(2,204,990)
282100/1	ADIT: PP&E	
Protected PP&E	PP&E Method Life	31,411,585 Protected
T13A04	AFUDC Debt	53,739 Unprotected
T13A05	ARO	189,475 Unprotected
T13A08	CIAC	(17,193) Unprotected
T13A09	Depr Cap Trans Equip	8,279 Unprotected
T13A12	Depreciation Lag	(3) Unprotected
T13A14	Hardware Capitalized	(1,906) Unprotected
T13A16	Highway Bill	3,142 Unprotected
T13A18	Leased Meter Adjust	978,750 Unprotected
T13A19	Meters & Trans	(33,198) Unprotected
T13A26	Method/Life	(403,634) Unprotected

Code	Name	Rate Change
T13A28	Misc Diffs	(20,706) Unprotected
T13A30	Non-cash Overheads	(223,020) Unprotected
T13A99	Percentage Repair Allowance	113,700 Unprotected
T13B09	PR Tax	1,759 Unprotected
T13B11	Purch Res	4,546 Unprotected
T13B18	Sect. 174 Adjust	13,040 Unprotected
T13B23	Software Capitalized	(2,909) Unprotected
T13B31	Tax Dept Adjust	27,808 Unprotected
T13B44	TIC	(98,929) Unprotected
Total 282100/1		32,004,326
283100/1	ADIT: Other	
T15A24	Loss on Reacquired Debt-Amort	31,544 Unprotected
T15B04	Reg Asset - Accr Pension FAS158 - FAS87Qual	0 Unprotected
T15B17	Reg Liab RSLI & Other Misc Dfd Costs	382,591 Unprotected
T15B29	Reg Asset-Pension Post Retirement PAA-FAS87Qual and Oth	826,535 Unprotected
T15B37	Reg Asset-Pension Post Retirement PAA-FAS87NQ and Oth	(264) Unprotected
T15B38	Reg Asset-Pension Post Retirement PAA-FAS 106 and Oth	81,782 Unprotected
T15B40	Reg Asset - Accr Pension FAS158 - FAS87NQ	(184,570) Unprotected
T15B41	Reg Asset - Accr Pension FAS158 - FAS 106/112	1,515 Unprotected
T17A01	Vacation Carryover - Reg Asset	48,791 Unprotected
T19A91	Rate Case - Deferred Costs	(13,338) Unprotected
T19A92	DEFERRED FUEL COST P.G.A.	13,338 Unprotected
T20A40	Non-Current Portion of Reg Asset	0 Unprotected
T22A23	Retirement Plan Expense - Overfunded	68,953 Unprotected
T22H12	ARO Regulatory Asset	659,736 Unprotected
Total 283100/1		1,916,613
Total	Protected EDIT	31,411,585
	Unprotected EDIT	304,365
	Total EDIT	31,715,950

Attorney General's First Set Data Requests

Date Received: June 30, 2021

AG-DR-01-033

REQUEST:

Describe all EDIT considered by the Company to be protected EDIT by temporary

difference.

RESPONSE:

Temporary timing differences for PP&E deferred taxes are created in two ways. First are

differences in depreciation method / life. Book accounting is generally straight line with

longer depreciation timeframes. Tax accounting is generally a shorter depreciation life with

accelerated depreciation methods whereby depreciation is higher in the earlier years. The

second type of PP&E timing differences are created when the book accounting and the tax

accounting have difference basis amounts. For example, Tax accounting does not recognize

certain things in the depreciable tax basis such as AFUDC and book does not recognized

certain taxable contributions in aid of construction. Differences that are related to method

/ life temporary differences are considered protected deferred taxes. Differences resulting

from basis differences are considered not protected.

PERSON RESPONSIBLE:

John R. Panizza

Attorney General's First Set Data Requests

Date Received: June 30, 2021

AG-DR-01-034

REQUEST:

Provide a schedule showing the monthly reductions of income tax expense during the test

year associated with the projected amortization of the January 1, 2022 EDIT amounts by

temporary difference.

RESPONSE:

Please see AG-DR-01-034 Attachment for the monthly reductions of the income tax

expense during the test year associated with the amortization of the EDITs.

Duke Energy Kentucky tracks EDIT separately for the protected regulatory liability

and unprotected regulatory liability. The protected liability is amortized in accordance with

ARAM and the unprotected liability is amortized straight-line over 10 years per the Order

in Case No. 2018-00261. The Company does not track temporary differences within the

regulatory liability.

PERSON RESPONSIBLE:

John R. Panizza

DE Kentucky - Gas Federal EDIT Workpaper

EDIT: Estimate As Of 12/31/2017 2018 Return True Up 2018 PP&E True Up Protected to unprotected mvmt Total EDIT To Be Amortized

	Federal		State
Protected	Unprotected PP&E	Unprotected Non PP&E	Unprotected
(31,411,585)	(592,741)	288,377	(606,758)
(936,114)	· -	32,776	, ,
(113,151)	164,326	-	
307,747	(307,747)	_	
(32,460,850)	(428,415)	321,153	(606,758)

	(a)	(b)	(c) Amortization Of	(d)=(a)+(b)+(c)	(e) SEDIT total projected	(f)=(d)+(e)
	Protected EDIT Amortization	Amortization Of Unprotected EDIT	Unprotected Non PP&E EDIT	Total Projected Federal EDIT Amortization	EDIT Amortization for 2022	Total Projected EDIT Amortization for 2022
Jan-22	(50,000)	(4,940)	2,403	(52,536)	(5,056)	(57,593)
Feb-22	(50,000)	(4,940)	2,403	(52,536)	(5,056)	(57,593)
Mar-22	(50,000)	(4,940)	2,403	(52,536)	(5,056)	(57,593)
Apr-22	(50,000)	(4,940)	2,403	(52,536)	(5,056)	(57,593)
May-22	(50,000)	(4,940)	2,403	(52,536)	(5,056)	(57,593)
Jun-22	(50,000)	(4,940)	2,403	(52,536)	(5,056)	(57,593)
Jul-22	(50,000)	(4,940)	2,403	(52,536)	(5,056)	(57,593)
Aug-22	(50,000)	(4,940)	2,403	(52,536)	(5,056)	(57,593)
Sep-22	(50,000)	(4,940)	2,403	(52,536)	(5,056)	(57,593)
Oct-22	(50,000)	(4,940)	2,403	(52,536)	(5,056)	(57,593)
Nov-22	(50,000)	(4,940)	2,403	(52,536)	(5,056)	(57,593)
Dec-22	(50,000)	(4,940)	2,403	(52,536)	(5,056)	(57,593)
Total	(600,000)	(59,274)	28,838	(630,436)	(60,676)	(691,112)
As per E-1				(630,436)	(74,589)	(705,025)
Variance				(0)	13,913	13,913
Variance Explanation: FBOS on SEDIT as per E-1 page 3 of 3 Misc. State deferred item Total	Row 25				15,664 (1,751) 13,913	

То

Attorney General's First Set Data Requests

Date Received: June 30, 2021

AG-DR-01-035

REQUEST:

Provide the amortization periods being utilized for the amortization of unprotected EDIT

balances. In addition, provide the remaining amortization period for the unprotected EDIT

as of the December 31, 2022.

RESPONSE:

The Company is amortizing unprotected EDIT over 10 years per the Commission order in

Case No. 2018-00261. As of December 31, 2022, the remaining amortization period for

the unprotected EDIT would be 5 years and 10 months.

PERSON RESPONSIBLE:

John R. Panizza

Attorney General's First Set Data Requests

Date Received: June 30, 2021

AG-DR-01-036

REQUEST:

Refer to the Direct Testimony of Mr. Panizza at pages 9-10. Provide the calculations of

estimated test year property tax expense, including copies of the sources of the property

tax rates, in electronic format with all formulas intact.

RESPONSE:

Please see AG-DR-01-036 Attachment 1 for calculation of estimated test year property tax

expense and AG-DR-01-036 Attachment 2 for sources of property tax billed amounts used

to calculate estimated property tax rates.

PERSON RESPONSIBLE:

John R. Panizza

Duke Energy Kentucky Gas Property Tax Calculation

Calculation of blended rate for forecasting purposes:								
Based on 2017 property taxes, to be pai	id in 2018 (\$000s)							
				Gas Allocation	Gas			
Duke Energy Kentucky	Allocation %	Δ.	Allocation \$	%	Allocation \$			
Electric	72%	\$	6,182	0%	0			
Gas	26%	\$	2,232	100%	2,232			
						Ne	et Tangible	
Common	2%	\$	172	30%	52	Р	lant (Gas)	Calculated Rate
Total Tax per Bills	100%	\$	8,586	•	2,284	\$	307,300	0.7432%

Calculation of forecasted property tax expense, with and without escalation:				
			Forecasted	
	12/31/2021	Calculated Rate	Expense - Test	
	Projected Plant	for Forecast	Period	
Plant In Service	579,590	0.7432%	\$ 4,308	

Fiscal Year CMD	Monetary Amount JD	Vandor Nama ID
2018		BOONE COUNTY SHERIFFS DEPARTMENT
2018	_	COUNTY OF GRANT SHERIFF KY
2018		COMMONWEALTH OF KENTUCKY
2018	•	COMMONWEALTH OF KENTUCKY
2018	, ,	CITY OF GLENCOE
2018	532	CITY OF SILVER GROVE
2018	1,613	CITY OF WARSAW
2018	3,459	CITY OF RYLAND HEIGHTS
2018	3,718	CITY OF BUTLER
2018	7,518	CITY OF WALTON
2018	7,859	CITY OF WILLIAMSTOWN
2018	8,707	CITY OF FORT MITCHELL KY
2018	10,220	CITY OF CRESCENT SPRINGS
2018	10,717	CITY OF ALEXANDRIA
2018	12,142	CITY OF DRY RIDGE
2018	12,449	CITY OF WILDER
2018	13,167	CITY OF COLD SPRING
2018	,	CITY OF PARK HILLS
2018	19,691	CITY OF FALMOUTH
2018	•	GALLATIN COUNTY
2018	•	CITY OF LAKESIDE PARK
2018	,	CITY OF EDGEWOOD
2018	•	CITY OF FORT WRIGHT
2018	,	CITY OF BELLEVUE
2018	•	CITY OF DAYTON
2018	,	CITY OF TAYLOR MILL
2018	•	PENDLETON COUNTY SHERIFFS OFFICE
2018	,	CITY OF INDEPENDENCE
2018	•	CITY OF SOUTHGATE
2018	·	CITY OF FORT THOMAS
2018 2018	•	CITY OF FORT THOMAS CITY OF FLORENCE
2018	,	COUNTY OF GRANT SHERIFF KY
2018	•	CITY OF FORT THOMAS
2018	•	CITY OF COVINGTON
2018	•	CITY OF NEWPORT
2018	•	CAMPBELL COUNTY CLERK
2018	•	BOONE COUNTY SHERIFFS DEPARTMENT
2018		KENTON COUNTY SHERIFFS OFFICE
2018		CITY OF CRITTENDEN
2018	-,	BRACKEN COUNTY SHERIFF OFFICE
2018	•	CITY OF HIGHLAND HEIGHTS
2018	•	CITY OF ERLANGER
2018	•	CITY OF BROMLEY
2018		ERLANGER-ELSMERE BOARD OF EDUCATION
Tota		-
	<u> </u>	=

Attorney General's First Set Data Requests

Date Received: June 30, 2021

AG-DR-01-037

REQUEST:

Refer to the Direct Testimony of Mr. Panizza at pages 9-10. Provide the most current and

the after increase property tax rates related to the anticipated tax rate increases and explain

how each were determined.

RESPONSE:

Please see AG-DR-01-036 Attachment 1 for the calculation of the estimated property tax

rate for forecasting purposes. The property tax rate used to estimate property tax expense

in the test period was based on actual property tax bills to be paid in 2018. No property tax

rate increases were assumed for purposes of estimating property tax expense in the test

period.

PERSON RESPONSIBLE:

Abby L. Motsinger

Attorney General's First Set Data Requests

Date Received: June 30, 2021

AG-DR-01-038

REQUEST:

Refer to the Direct Testimony of Mr. Panizza at pages 9-10. Quantify the projected increase

amounts for property tax expense associated with the "anticipated property tax rate

increases" as opposed to all other causes of projected property tax expense increases.

RESPONSE:

The property tax rate used to estimate property tax expense in the test period was based on

actual property tax bills to be paid in 2018. No property tax rate increases were assumed

for purposes of estimating property tax expense in the test period.

PERSON RESPONSIBLE:

Abby L. Motsinger

Duke Energy Kentucky
Case No. 2021-00190
Attorney General's First Set Data Requests
Date Received: June 30, 2021

CONFIDENTIAL AG-DR-01-039 (As to Attachments only)

REQUEST:

Provide the two most recent pension and OPEB actuarial reports for Duke Energy, DEO, and DEK.

RESPONSE:

CONFIDENTIAL PROPRIETARY TRADE SECRET (As to Attachments only)

Please see AG-DR-01-039 Confidential Attachments 1 and 2.

PERSON RESPONSIBLE: Jake J. Stewart

CONFIDENTIAL PROPRIETARY TRADE SECRET

AG-DR-01-039 CONFIDENTIAL ATTACHMENT 1

FILED UNDER SEAL

CONFIDENTIAL PROPRIETARY TRADE SECRET

AG-DR-01-039 CONFIDENTIAL ATTACHMENT 2

FILED UNDER SEAL

Attorney General's First Set Data Requests

Date Received: June 30, 2021

CONFIDENTIAL AG-DR-01-040 (As to Attachment only)

REQUEST:

Provide the pension and OPEB actuarial reports for Duke Energy, DEO, and DEK and/or other support for the test year pension expense and OPEB expense included in the test year.

RESPONSE:

CONFIDENTIAL PROPRIETARY TRADE SECRET (As to Attachment only)

Please see AG-DR-01-040 Confidential Attachment.

PERSON RESPONSIBLE: Jake J. Stewart

CONFIDENTIAL PROPRIETARY TRADE SECRET

AG-DR-01-040 CONFIDENTIAL ATTACHMENT

FILED UNDER SEAL

Attorney General's First Set Data Requests

Date Received: June 30, 2021

AG-DR-01-041

REQUEST:

For employees who participate in a defined benefit plan, provide the total and jurisdictional

amounts of matching contributions made on behalf of employees who also participate in

any 40l(k) retirement savings account.

RESPONSE:

The Duke Energy Kentucky Gas forecast test period amount (calendar year 2022) of

employer 401(k) match for employees who also participate in the defined benefit plan is

\$220,196.

PERSON RESPONSIBLE:

Jake J. Stewart

Attorney General's First Set Data Requests

Date Received: June 30, 2021

AG-DR-01-042

REQUEST:

Provide a copy of the Company's guidelines and/or all written criteria that describe when,

what (type), how, and how much short-term debt will be issued and outstanding at any

time. If the Company has no written guidelines and/or written criteria, so state.

RESPONSE:

The Company has no such written criteria. In practice, the Company utilizes the Duke

Energy Money Pool for its short-term funding needs until a sufficient amount is

accumulated to warrant the issuance of long-term debt to replace some, or all, of these

Money Pool borrowings.

PERSON RESPONSIBLE:

Chris R. Bauer

Attorney General's First Set Data Requests

Date Received: June 30, 2021

PUBLIC AG-DR-01-043

REQUEST:

Provide a schedule in electronic spreadsheet format showing the Company's average daily

and end of month borrowings from the Duke Energy Money Pool for each month in 2019,

2020, and 2021 to date and projected for each month thereafter through the end of the test

year. In addition, provide the interest rates applicable to those borrowings on a daily basis

and on average for each month. Provide a copy of all source documents relied on for the

projected cost of short-term debt during the test year.

RESPONSE:

CONFIDENTIAL PROPRIETARY TRADE SECRET
(As to Redacted Text and Attachment 3)

information. Note that the forecast is developed on a monthly basis. Therefore, the forecast

Please see AG-DR-01-043 Attachment 1 for requested Duke Energy Money Pool

information is monthly only.

Short-term debt rates used for the test period include rates for:

• Current Maturities: 4.01% due 10/15/23:

o Please see AG DR 01-043 Attachment 2, ninth row down for this item.

• Amounts Sold for Cash/Classified as Receivable, 1.3405%:

O See the table below as supporting calculation for the 1.3405 percent. The

-basis-point credit spread used for the Sale of Accounts Receivables

includes an estimate of: (a) the credit spread on the Sale of Accounts

Receivables financing, and (b) incremental interest over 1 month LIBOR

that the participating banks charge (this was approximately basis points above 1 month LIBOR, which was rounded down to basis points for this calculation).

The credit spread on the current Sale of Accounts Receivables agreement is basis points. The aforementioned basis points is in addition to this credit spread. Please see AG-DR-01-043 Confidential Attachment 3 for the approximation of the basis point charge above 1 month LIBOR. Please see AG-DR-01-043 Attachments 4 and 5 for screen shots from Bloomberg of the LIBOR forward curve.

Date	Forward 1M LIBOR	Forecasted Spread to 1M LIBOR	Forecasted interest rate
	A	В	C=A+B
12/31/2021	0.25%		
1/31/2022	0.25%		
2/28/2022	0.23%		
3/31/2022	0.21%		
4/30/2022	0.21%		
5/31/2022	0.24%		
6/30/2022	0.26%		
7/31/2022	0.26%		
8/31/2022	0.30%		
9/30/2022	0.39%		
10/31/2022	0.39%		
11/30/2022	0.39%		
12/31/2022	0.39%		
		13-month average:	1.3405%

- Notes Payable Short-term Money Pool Balance, 0.2905%
 - This rate is based on the forward 1 month LIBOR curve. The average over the 13 month period is 0.2905%. See calculation below. Please see AG-DR-01-043 Attachments 4 and 5 for screen shots from Bloomberg of the LIBOR forward curve.

Date	Forward 1M LIBOR
12/31/2021	0.2513%
1/31/2022	0.2513%
2/28/2022	0.2336%
3/31/2022	0.2146%
4/30/2022	0.2146%
5/31/2022	0.2367%
6/30/2022	0.2587%
7/31/2022	0.2587%
8/31/2022	0.2980%
9/30/2022	0.3899%
10/31/2022	0.3899%
11/30/2022	0.3899%
12/31/2022	0.3899%
Average	0.2905%

PERSON RESPONSIBLE: Chris R. Bauer

Money Pool Borrowings - Including \$25 million long-term balance

Historical Information:

istorical information.						
	Daily Aver	age	End of Mo	nth		
	Borrowings	Rate	Borrowings	Rate		
Jan-19	\$55,218,452	2.7293%	\$75,233,000	2.7608%		
Feb-19	64,345,893	2.7210%	72,972,000	2.7696%		
Mar-19	65,006,677	2.6921%	74,603,000	2.6984%		
Apr-19	74,713,900	2.6847%	82,874,000	2.6820%		
May-19	79,345,226	2.6784%	93,586,000	2.6743%		
Jun-19	86,648,267	2.6355%	112,621,000	2.3200%		
Jul-19	102,508,516	2.5634%	88,558,000	2.5261%		
Aug-19	78,744,516	2.3449%	96,225,000	2.3026%		
Sep-19	85,334,833	2.2332%	75,000,000	2.1949%		
Oct-19	42,708,806	2.0948%	64,554,000	2.0271%		
Nov-19	62,909,767	1.8333%	169,506,000	1.8419%		
Dec-19	95,159,613	1.8301%	109,862,000	1.9141%		
Jan-20	104,274,935	1.7656%	110,524,000	1.7816%		
Feb-20	100,528,893	1.7159%	102,386,000	1.7657%		
Mar-20	101,341,903	1.7417%	116,581,000	2.2457%		
Apr-20	109,197,300	1.3167%	118,498,000	1.4714%		
May-20	105,227,613	0.7288%	120,979,000	0.5216%		
Jun-20	106,890,367	0.2916%	102,394,000	0.2717%		
Jul-20	106,720,258	0.2391%	127,207,000	0.2594%		
Aug-20	120,197,387	0.2118%	392,439,000	0.2430%		
Sep-20	92,832,233	0.1797%	64,831,000	0.2284%		
Oct-20	61,363,452	0.2134%	75,016,000	0.2242%		
Nov-20	75,670,600	0.2188%	270,924,000	0.2343%		
Dec-20	92,094,032	0.2481%	101,783,000	0.2648%		
Jan-21	88,858,677	0.2418%	104,174,000	0.2238%		
Feb-21	99,610,607	0.2024%	105,157,000	0.1986%		
Mar-21	100,863,742	0.1954%	106,804,000	0.0400%		
Apr-21	94,409,367	0.1566%	106,432,000	0.0300%		
May-21	88,752,871	0.1628%	108,363,000	0.0100%		
Jun-21	70,261,967	0.1652%	53,848,000	0.1720%		

Forecasted information:

Daily Average and End of Month

	Borrowings	Rate
Jul-21	115,587,004	0.1668%
Aug-21	114,577,642	0.1792%
Sep-21	25,000,000	0.1915%
Oct-21	25,000,000	0.1915%
Nov-21	25,000,000	0.2224%
Dec-21	25,000,000	0.2513%
Jan-22	25,000,000	0.2513%
Feb-22	25,000,000	0.2336%
Mar-22	25,000,000	0.2146%
Apr-22	25,000,000	0.2146%
May-22	25,000,000	0.2367%
Jun-22	25,898,283	0.2587%
Jul-22	33,334,072	0.2587%
Aug-22	36,234,630	0.2980%
Sep-22	25,000,000	0.3899%
Oct-22	25,000,000	0.3899%
Nov-22	25,000,000	0.3899%
Dec-22	25,000,000	0.3899%

Duke Energy Debt Detail March 31, 2021 Includes Current Maturities

Entity	Reporting Node Description	USD Balance	Rate	Type	Estimated Settlement Date urity Date	Cusip
Duke Energy Kentucky						
Duke Energy Kentucky	Other Pollution Control Bond - LC - swap	26,720,000	0.110%	Floating	02/01/12 08/01/27	098792AP9
Duke Energy Kentucky	Other Pollution Control Bond - LC (Put Date 11/1/21)	50,000,000	1.089%	Floating	11/04/16 08/01/27	098792AN4
Duke Energy Kentucky	Unsecured	65,000,000	6.200%	Fixed	03/07/06 03/10/36	906888AS1
Duke Energy Kentucky	Unsecured	45,000,000	3.420%	Fixed	01/05/16 01/15/26	Private Placement
Duke Energy Kentucky	Unsecured	50,000,000	4.450%	Fixed	01/05/16 01/15/46	Private Placement
Duke Energy Kentucky	Unsecured	30,000,000	3.350%	Fixed	09/07/17 09/15/29	Private Placement
Duke Energy Kentucky	Unsecured	30,000,000	4.110%	Fixed	09/07/17 09/15/47	Private Placement
Duke Energy Kentucky	Unsecured	30,000,000	4.260%	Fixed	09/07/17 09/15/57	Private Placement
Duke Energy Kentucky	Unsecured	25,000,000	4.010%	Fixed	10/03/18 10/15/23	Private Placement
Duke Energy Kentucky	Unsecured	40,000,000	4.180%	Fixed	10/03/18 10/15/28	Private Placement
Duke Energy Kentucky	Unsecured	35,000,000	4.620%	Fixed	12/12/18 12/15/48	Private Placement
Duke Energy Kentucky	Unsecured	40,000,000	4.320%	Fixed	07/17/19 07/15/49	Private Placement
Duke Energy Kentucky	Unsecured	95,000,000	3.230%	Fixed	09/26/19 10/01/25	Private Placement
Duke Energy Kentucky	Unsecured	75,000,000	3.560%	Fixed	09/26/19 10/01/29	Private Placement
Duke Energy Kentucky	Unsecured	35,000,000	2.650%	Fixed	09/15/20 09/15/30	Private Placement
Duke Energy Kentucky	Unsecured	35,000,000	3.660%	Fixed	09/15/20 09/15/50	Private Placement
Duke Energy Kentucky	Commercial Paper LTD	25,000,000	0.260%	Floating	03/16/25	
Duke Energy Kentucky	Unamortized Debt Discount/Premium	(183,236)				
Duke Energy Kentucky	Unamortized Debt Issuance Costs	(2,623,025)				
Total Duke Energy Kentucky		728,913,739			·	

CONFIDENTIAL PROPRIETARY TRADE SECRET

AG-DR-01-043 CONFIDENTIAL ATTACHMENT 3

FILED UNDER SEAL





Attorney General's First Set Data Requests

Date Received: June 30, 2021

AG-DR-01-044

REQUEST:

Refer to the Direct Testimony of Mr. Bauer at pages 13-14 in regards to short-term debt

and to Schedule J-2 for the types and amounts of short-term debt depicted for the base and

test years. Explain all reasons why the amounts depicted for the Notes Payable Money

Pool decreased so substantially from \$89.578 million in the base year to only \$1.574

million projected in the test year.

RESPONSE:

The 13-month average money pool payable balance ending 12/31/2022 is lower than the

8/31/2021 balance due to Duke Energy Kentucky switching from a payable to receivable

position in the utility money pool for most of the 13 months Dec-2021 to Dec-2022

following the forecasted financing inflows of cash beginning September 2021. These

inflows include both anticipated long-term debt issuances and equity contributions from

the parent company.

PERSON RESPONSIBLE:

Chris R. Bauer

Attorney General's First Set Data Requests

Date Received: June 30, 2021

AG-DR-01-045

REQUEST:

Refer to the Direct Testimony of Mr. Bauer at page 14. Provide a calculation of the

weighted average short-term interest rates using the most current Bloomberg's implied

forward curve for one-month LIBOR instead of those from February 2021.

RESPONSE:

The table below represents the weighted average cost of short-term debt for the Base and

Forecast periods using Bloomberg's most current implied forward curve for one-month

LIBOR. The screenshots of the forward curve can be found in AG-DR-01-045 Attachment.

	Base Period (at August 2021)	Forecast Period (Avg of Dec 2021 thru Dec 2022)	
Short-Term Debt	0.585 percent	1.642 percent	

PERSON RESPONSIBLE: Chris R. Bauer



Attorney General's First Set Data Requests

Date Received: June 30, 2021

,

AG-DR-01-046

REQUEST:

Refer to the Direct Testimony of Mr. Bauer at pages 14-15 and to lines 22-27 regarding

prior issues and the forecast Future Debentures issues on Schedule J-3 for the forecast test

year.

a. Provide the interest rates obtained and projected for each of the referenced

issues with and without the applicable credit spreads.

b. Provide copies of the source information used to reflect each of the February

2021 Bloomberg forward curves.

c. Provide a calculation of the weighted average interest rates using current

Bloomberg forward curves for each tranche originally projected. Provide in

electronic format with all formulas intact.

d. Provide the workpaper calculation for each of the projected issuances depicted

as Future Debentures. Provide in electronic format with all formulas intact.

e. Provide an update of the progress for the projected September 2021 issuance,

including a description of any terms if now agreed upon.

f. Provide copies of the source information used to determine potential credit

spreads for each of the tranches of the Future Debentures projected.

g. If the potential credit spreads for each of the tranches of the Future Debentures

projected is higher than the actual issuances depicted on lines 22-25 of Schedule

J-3, explain why.

RESPONSE:

a. The interest rates obtained for the prior issuances of long term debt in lines 22-25 of the J Schedule are below:

J Schedule Line	Rate Type	Treasury	Credit Spread	All in Coupon
22	Obtained	1.88%	1.35%	3.23%
23	Obtained	2.06%	1.50%	3.56%
24	Obtained	0.70%	1.95%	2.65%
25	Obtained	1.46%	2.20%	3.66%

The interest rates on the planned September 2021 and 2022 debt issuances were estimated using a blended average of Bloomberg's forward curves for the 5-year, 10-year, and 30-year US Treasury yield plus an estimated credit spread for a future debt issuance. Please see AG-DR-01-046(a) Attachments 1 and 2 for the forward US Treasury rates for 9/15/2021 and 9/15/2022 for the 5-year, 10-year, and 30-year Treasury rates used in the calculations below. Since there is no forward curve for credit spreads, we used the then-current credit spreads for Duke Energy Kentucky.

		9/15/2021	Current	
Tenor	Weight	UST	Spread	Cpn
5-yr	10%	1.08%	1.40%	2.48%
10-yr	35%	1.77%	1.50%	3.27%
30-yr	55%	2.42%	1.75%	4.17%
20.5-yr		2.06%	1.63%	3.686%

Weighted Average

		9/15/2022	Current	
Tenor	Weight	UST	Spread	Cpn
5-yr	10%	1.53%	1.40%	2.93%
10-yr	35%	2.07%	1.50%	3.57%
30-yr	55%	2.53%	1.75%	4.28%
20.5-yr		2.27%	1.63%	3.896%

Weighted Average b. Please see AG-DR-01-046(b) Attachments 1 and 2 for the one-month LIBOR

forward curves from Bloomberg.

c. Please see AG-DR-01-046(c) Attachments 1 and 2 for the forward US Treasury

rates for 9/15/2021 and 9/15/2022 for the 5-year, 10-year, and 30-year Treasury

rates used in the updated calculations. Please see AG-DR-01-046(c)

Attachment 3 for electronic format with all formulas intact.

d. Please see AG-DR-01-046(a) Attachment 1, AG-DR-01-046(a) Attachment 2,

AG-DR-01-046(d) Attachments 1 and 2 for the calculation of the projected

issuances in 2021 and 2022.

e. As of July 8, Duke Energy has mandated KeyBanc as the sole placement agent

for the projected September 2021 long term debt issuance. There are no other

updates at this time.

f. Please see AG-DR-01-046(d) Attachment 1 for potential Kentucky credit

spreads.

g. The only instance where this is true is for the 3.230% September 2019 issuance,

which had a spread of 135 bps (6-year tenor) compared to the 5 year projected

tenor of 140 bps. Credit spreads move daily as do the benchmark UST rates. It

is not reasonable to compare credit spreads from two years ago to today's

anticipated credit spreads as markets are dynamic and change daily.

PERSON RESPONSIBLE:

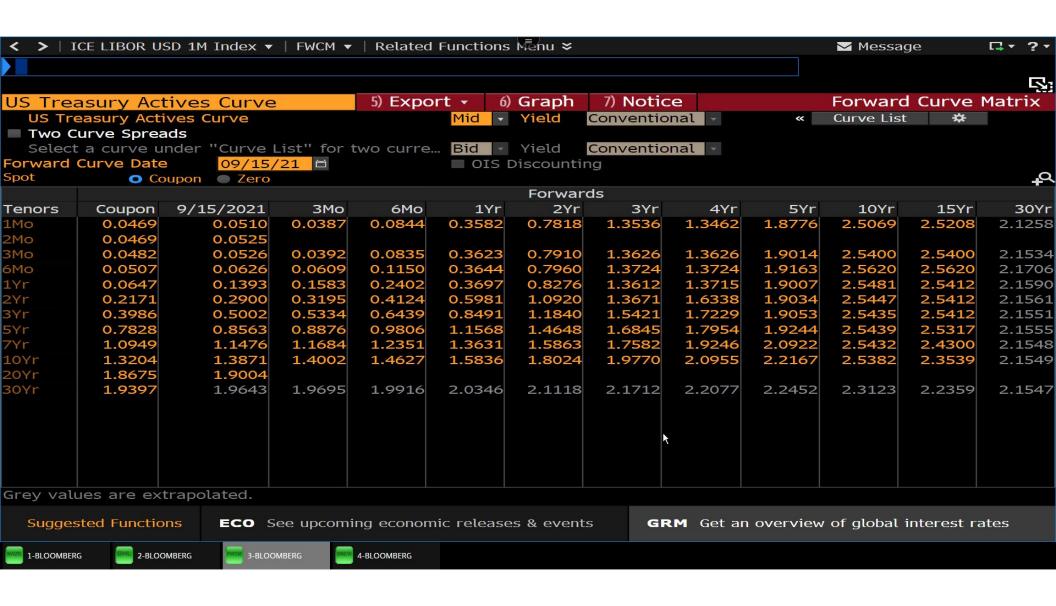
Chris R. Bauer

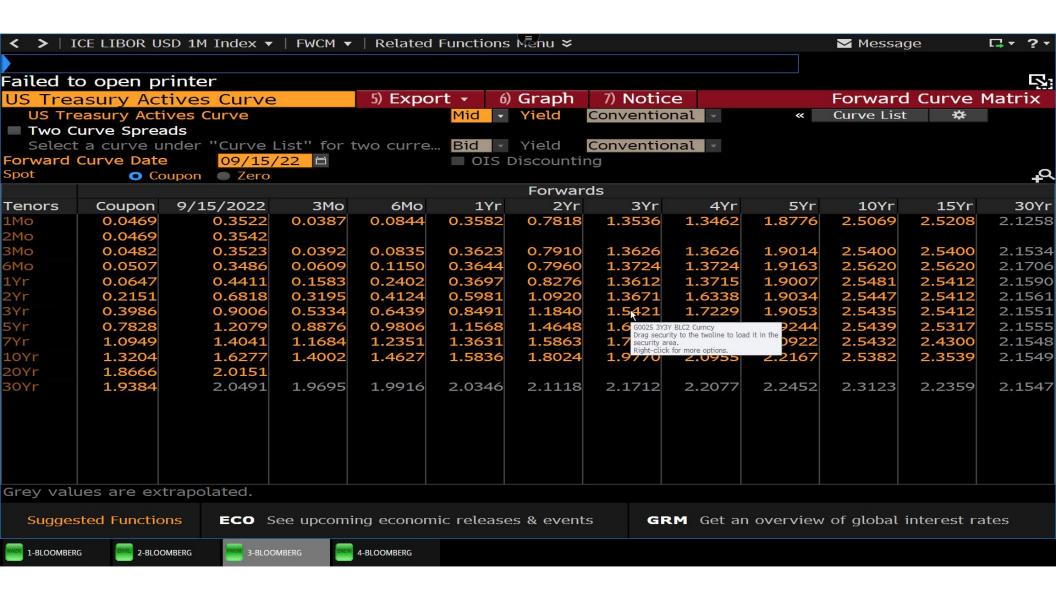












			9/15/2021	Current	
	Tenor	Weight	UST	Spread	Cpn
	5-yr	10%	0.86%	1.40%	2.26%
	10-yr	35%	1.39%	1.50%	2.89%
	30-yr	55%	1.97%	1.75%	3.72%
Weighted Average	20.5-yr		1.65%	1.63%	3.28%

			9/15/2022	Current	
	Tenor	Weight	UST	Spread	Cpn
	5-yr	10%	1.21%	1.40%	2.61%
	10-yr	35%	1.63%	1.50%	3.13%
	30-yr	55%	2.05%	1.75%	3.80%
Weighted Average	20.5-yr		1.82%	1.63%	3.44%

Duke Energy KentuckyPrivate Placement Pricing Update

KeyBanc Capital Markets

Utilities, Power & Renewable Investment Banking
Debt Capital Markets

March 2021





KeyBanc Capital Markets

DISCLOSURE OF PARTIES, DUAL EMPLOYEE STATUS AND RELATED MATTERS

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Indicative DEK Private Placement Pricing

Indicative New Issue Pricing		Duke Energy Kentucky, Inc	•			
Security:	Senior Unsecured Debentures	3				
Unsecured Ratings:	Baa1 / BBB+ (NAIC-2 Equivalent)					
Market:	Reg-D Private Placement					
Maturity	5-year	10-year	30-year			
Benchmark UST	5-year UST	10-year UST	30-year UST			
US Treasury Yield	0.83%	1.62%	2.38%			
Estimated Credit Spread	+140 bps area	+150 bps area	+175 bps area			
Indicative Yield to Maturity	2.23%	3.12%	4.13%			



as of March 16, 2021

Assmptions from Plan		Bloomberg	KeyBanc	
		9/15/2021	Current	
Tenor	Weight	UST	Spread	Cpn
5-yr	10%	1.08%	1.40%	2.48%
10-yr	35%	1.77%	1.50%	3.27%
30-yr	55%	2.42%	1.75%	4.17%
20.5-yr		2.06%	1.63%	3.69%

wtd avg

as of March 16, 2021

Assmptions from Plan		Bloomberg	KeyBanc	
		9/15/2022	Current	
Tenor	Weight	UST	Spread	Cpn
5-yr	10%	1.53%	1.40%	2.93%
10-yr	35%	2.07%	1.50%	3.57%
30-yr	55%	2.53%	1.75%	4.28%
20.5-vr	_	2.27%	1.63%	3.90%

Source: Bloomberg

Tenors	Cpn	9/15/2021	3MO	6MO	1YR	2YR	3YR	4YR	5YR	10YR	15YR	30YR
1Mo	0.0076	0.09688529	0.0821	0.0964	0.2236	0.6801	1.5771	1.5685	2.4211	3.0913	3.1083	2.6133
2Mo	0.0139	0.097716615										
3Мо	0.0165	0.09728395	0.0852	0.0964	0.2236	0.6804	1.5792	1.5706	2.4261	3.0993	3.1163	2.6189
6Mo	0.0482	0.109712217	0.0906	0.1094	0.2261	0.6884	1.591	1.591	2.4602	3.1456	3.1456	2.6559
1Yr	0.071	0.168666003	0.1325	0.1677	0.2443	0.692	1.578	1.6179	2.4402	3.1285	3.12	2.642
2Yr	0.151	0.321890748	0.246	0.3222	0.4682	1.1302	1.599	2.0245	2.4442	3.1243	3.12	2.6384
3Yr	0.3366	0.595010246	0.4676	0.591	0.8327	1.2892	1.8737	2.1624	2.4531	3.1229	3.12	2.6372
5Yr	0.8298	1.077192821	0.9529	1.0696	1.2977	1.7375	2.1005	2.2818	2.4704	3.1234	3.114	2.6377
7Yr	1.2781	1.453700935	1.3615	1.4472	1.6133	1.936	2.2074	2.4265	2.6446	3.1225	2.9871	2.6369
10Yr	1.6197	1.770566377	1.6897	1.765	1.9143	2.2054	2.4575	2.6149	2.7739	3.119	2.892	2.637
20Yr	2.2896	2.348212928										
30Yr	2.3804	2.420275053	2.3866	2.4143	2.47	2.5792	2.6723	2.7251	2.7782	2.8437	2.7451	2.6367

KyPSC Case No. 2021-00190 AG-DR-01-046(d) Attachment 2 Page 3 of 3

Tenors	Cpn	9/15/2022	3МО	6MO	1YR	2YR	3YR	4YR	5YR	10YR	15YR	30YR
1Mo	0.0076	0.226343067	0.0821	0.0964	0.2236	0.6801	1.5771	1.5685	2.4211	3.0913	3.1083	2.6133
2Mo	0.0139	0.227600322										
3Мо	0.0165	0.226384362	0.0852	0.0964	0.2236	0.6804	1.5792	1.5706	2.4261	3.0993	3.1163	2.6189
6Mo	0.0482	0.261654649	0.0905	0.1094	0.2261	0.6884	1.591	1.591	2.4602	3.1456	3.1456	2.6559
1Yr	0.071	0.475667799	0.1325	0.1677	0.2443	0.692	1.578	1.6179	2.4402	3.1285	3.12	2.642
2Yr	0.151	0.809633914	0.246	0.3222	0.4682	1.1302	1.599	2.0245	2.4442	3.1243	3.12	2.6384
3Yr	0.3366	1.06771013	0.4676	0.591	0.8327	1.2892	1.8737	2.1624	2.4531	3.1229	3.12	2.6372
5Yr	0.8298	1.52871016	0.9529	1.0696	1.2977	1.7375	2.1005	2.2818	2.4704	3.1234	3.114	2.6377
7Yr	1.2781	1.783915429	1.3615	1.4472	1.6133	1.936	2.2074	2.4265	2.6446	3.1225	2.9871	2.6369
10Yr	1.6197	2.067128925	1.6897	1.765	1.9143	2.2054	2.4575	2.6149	2.7739	3.119	2.892	2.637
20Yr	2.2896	2.494705901										
30Yr	2.3804	2.530906665	2.3866	2.4143	2.47	2.5792	2.6723	2.7251	2.7782	2.8437	2.7451	2.6367

Attorney General's First Set Data Requests

Date Received: June 30, 2021

AG-DR-01-047

REQUEST:

Refer to Schedule J-1 for the base and forecast test years. Provide a schedule in electronic

spreadsheet format showing each of the Company's actual components of capital for each

month in 2019, 2020, and 2021 to date and projected for each month thereafter through the

end of the test year.

RESPONSE:

Please see AG-DR-01-047 Attachment for the components of capital from 2019 through

the test year.

PERSON RESPONSIBLE:

Chris R. Bauer

DUKE ENERGY KENTUCKY
Case No. 2021-00190
Attorney General
First Set Data Requests
AG-DR-01-047

	Jan - 2019	Feb - 2019	Mar - 2019	Apr - 2019	May - 2019	Jun - 2019	Jul - 2019	Aug - 2019	Sep - 2019	Oct - 2019
Common Equity	\$ 604,704,676	\$ 609,681,030	\$ 617,073,633	\$ 615,620,413	\$ 619,475,358	\$ 622,815,183	\$ 628,482,984	\$ 630,810,516	\$ 634,148,328	\$ 634,665,143
Long Term Debt	\$ 449,688,863	\$ 449,705,079	\$ 449,542,393	\$ 449,564,109	\$ 449,585,824	\$ 449,606,322	\$ 489,596,630	\$ 489,618,345	\$ 658,783,985	\$ 658,771,598
Short Term Debt	\$ 187,916,698	\$ 188,639,016	\$ 186,742,217	\$ 192,578,670	\$ 201,462,727	\$ 216,703,760	\$ 193,589,075	\$ 201,636,592	\$ 129,081,813	\$ 70,380,360

Nov - 2019	Dec - 2019	Jan - 2020	Feb - 2020	Mar - 2020	Apr - 2020	May - 2020	Jun - 2020	Jul - 2020	Aug - 2020	Sep - 2020
\$ 640,506,603	\$ 645,093,594	\$ 654,042,353	\$ 660,740,900	\$ 663,425,862	\$ 666,196,880	\$ 669,538,474	\$ 698,334,042	\$ 704,484,739	\$ 709,493,741	\$ 710,729,085
\$ 658,782,594	\$ 658,806,823	\$ 658,828,154	\$ 658,852,382	\$ 658,876,611	\$ 658,900,840	\$ 658,925,068	\$ 658,949,297	\$ 658,973,526	\$ 658,966,688	\$ 728,776,359
\$ 93,713,103	\$ 118,166,043	\$ 90,921,463	\$ 113,651,198	\$ 127,128,033	\$ 130,905,943	\$ 131,582,047	\$ 116,391,066	\$ 136,075,084	\$ 140,933,993	\$ 74,422,010

Oct - 2020	Nov - 2020	Dec - 2020	Jan - 2021	Feb - 2021	Mar - 2021	Apr - 2021	May - 2021	Jun - 2021	Jul - 2021	Aug - 2021
\$ 711,530,058	\$ 715,137,495	\$ 718,236,890	\$ 728,524,520	\$ 735,210,398	\$ 740,303,668	\$ 743,091,819	\$ 746,406,332	\$ 802,563,109	\$ 747,662,979	\$ 752,091,746
\$ 728,788,878	\$ 728,784,494	\$ 678,796,137	\$ 678,975,045	\$ 678,998,723	\$ 679,022,401	\$ 679,046,079	\$ 679,069,757	\$ 679,093,435	\$ 678,413,477	\$ 678,454,851
\$ 83.762.585	\$ 103.715.984	\$ 164.134.565	\$ 170.308.208	\$ 170.360.719	\$ 169,273,372	\$ 170.041.870	\$ 168,412,434	\$ 118.338.591	\$ 177,133,030	\$ 176.139.191

Sep - 2021	Oct - 2021	Nov - 2021	Dec - 2021	Jan - 2022	Feb - 2022	Mar - 2022	Apr - 2022	May - 2022	Jun - 2022	Jul - 2022
\$ 804,017,025	\$ 806,194,916	\$ 811,107,618	\$ 818,389,521	\$ 826,184,816	\$ 834,644,974	\$ 859,628,371	\$ 861,250,883	\$ 863,541,056	\$ 866,221,491	\$ 870,169,985
\$ 728,496,226	\$ 728,387,906	\$ 778,292,912	\$ 778,336,564	\$ 778,380,217	\$ 778,423,869	\$ 778,467,522	\$ 778,511,174	\$ 778,554,827	\$ 778,598,479	\$ 778,642,132
\$ 86.577.072	\$ 86.592.595	\$ 36.588.235	\$ 36.592.595	\$ 36.592.595	\$ 36.592.595	\$ 36.592.595	\$ 36.592.595	\$ 36.592.595	\$ 37,490,878	\$ 44.926.667

KyPSC Case No. 2021-00190 AG-DR-01-047 Attachment Page 5 of 5

Aug - 2022	Sep - 2022	Oct - 2022	Nov - 2022	Dec - 2022
\$ 874,786,504	\$ 877,055,447	\$ 879,492,531	\$ 884,661,060	\$ 888,170,828
\$ 778,676,702	\$ 848,720,355	\$ 823,575,606	\$ 823,618,266	\$ 823,660,926
\$ 47,827,225	\$ 36,592,595	\$ 61,592,595	\$ 61,592,595	\$ 61,592,595

Attorney General's First Set Data Requests

Date Received: June 30, 2021

AG-DR-01-048

REQUEST:

Refer to Schedule J-1 for the base and forecast test years. Explain all reasons why the

Company common equity percentage of total capital is projected to increase from 46.809%

in the base year to 50.695% in the test year.

RESPONSE:

The equity component of the capital structure increases from base year to the test year with

the accumulation of net income and/or any equity infusions from the parent company,

while maintaining a consistent level of total debt over the same time period.

PERSON RESPONSIBLE:

Chris R. Bauer

Attorney General's First Set Data Requests

Date Received: June 30, 2021

AG-DR-01-049

REQUEST:

Refer to the Direct Testimony of Mr. Bauer at page 11 wherein he states, "Approval of the

proposed capital structure will help Duke Energy Kentucky maintain its credit quality to

meet its ongoing business objectives. This level is also consistent with the Company's

target credit ratings." Explain this statement if the percentage of common equity is

increasing over prior period levels and describe the Company's target credit ratings.

RESPONSE:

The company strives to maintain the capital structure in accordance with the approved

capital structure over the long run. Issuances of long-term debt will reduce the equity

component of the capital structure immediately following the transaction, and then the

equity component "catches up" with the accumulation of net income and/or any equity

infusions from the parent company.

PERSON RESPONSIBLE:

Chris R. Bauer