

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

In the Matter of:

ELECTRONIC 2021 INTEGRATED)	CASE NO.
RESOURCE PLAN OF DUKE)	2021-00245
ENERGY KENTUCKY, INC.)	

SIERRA CLUB’S INITIAL REQUESTS FOR INFORMATION TO DUKE

Pursuant to the Commission’s September 9, 2021, Order, Sierra Club hereby propounds the following initial requests for information to Duke Energy Kentucky, Inc. (“Duke” or “the Company”), in the above-captioned proceeding.

The Company shall answer these data requests in the manner and timeframe set forth in the aforementioned Order, including by no later than October 22, 2021. Please produce the requested documents in electronic format whenever possible, and to the following recipient:

Matthew E. Miller
Sierra Club
2528 California Street
Denver, CO 80205
Email: matthew.miller@sierraclub.org

Wherever the response to an interrogatory or request consists of a statement that the requested information is already available to Sierra Club, provide a detailed citation to the document that contains the information. This citation shall include the title of the document, relevant page number(s), and to the extent possible paragraph number(s) and/or chart(s)/table(s)/figure number(s).

In the event that any document referred to in response to any request has been destroyed, specify the date and the manner of such destruction, the reason for such destruction, the person authorizing the destruction and the custodian of the document at the time of its destruction.

Sierra Club reserves the right to serve supplemental and/or revised discovery requests as permitted in this proceeding.

DEFINITIONS

Unless otherwise specified in each individual interrogatory or request, “you,” “your,” the “Company,” or “Duke,” refers to Duke Energy Kentucky, Inc., and its affiliates, officers, directors, employees, and agents.

“And” and “or” shall be construed either conjunctively or disjunctively as required by the context to bring within the scope of these interrogatories and requests for production of documents any information which might be deemed outside their scope by another construction.

“Any” means all or each and every example of the requested information.

“Communication” means any transmission or exchange of information between two or more persons, whether orally or in writing, and includes, without limitation, any conversation or discussion by means of letter, telephone, note, memorandum, telegraph, telex, telecopy, cable, email, or any other electronic or other medium.

“Control” means that you have the right to secure a document or a copy thereof from another person or public or private entity having actual possession thereof. If a document is responsive to a request, but is not in your possession or custody, identify the person with possession or custody. If any document was in your possession or subject to your control, and is no longer, state what disposition was made of it, by whom, the date on which such disposition was made, and why such disposition was made.

“Document” refers to written matter of any kind, regardless of its form, and to information recorded on any storage medium, whether in electrical, optical or electromagnetic form, and capable of reduction to writing by the use of computer hardware and software, and includes all copies, drafts, proofs, both originals and copies either (1) in the possession, custody or control of the Company regardless of where located, or (2) produced or generated by, known to or seen by the Company, but now in their possession, custody or control, regardless of where located whether or still in existence. “Documents,” for purposes of the production of the same, shall include copies of all documents being produced, to the extent the copies are not identical to the original, thus requiring the production of copies that contain any markings, additions or deletions that make them different in any way from the original. Such “documents” shall include, but are not limited to, applications, permits, monitoring reports, computer printouts, contracts, leases, agreements, papers, photographs, tape recordings, transcripts, letters or other forms of correspondence, folders or similar containers, programs, telex, TWX and other teletype

communications, memoranda, reports, studies, summaries, minutes, minute books, circulars, notes (whether typewritten, handwritten or otherwise), agenda, bulletins, notices, announcements, instructions, charts, tables, manuals, brochures, magazines, pamphlets, lists, logs, telegrams, drawings, sketches, plans, specifications, diagrams, drafts, books and records, formal records, notebooks, diaries, registers, analyses, projections, email correspondence or communications and other data compilations from which information can be obtained (including matter used in data processing) or translated, and any other printed, written, recorded, stenographic, computer-generated, computer-stored, or electronically stored matter, however and by whomever produced, prepared, reproduced, disseminated or made.

“Identify” means:

- (a) With respect to a person, to state the person’s name, address and business relationship (e.g., “employee”) vis-à-vis the Company;
- (b) With respect to a document, to state the nature of the document in sufficient detail for identification in a request for production, its date, its author, and to identify its custodian. If the information or document identified is recorded in electrical, optical or electromagnetic form, identification includes a description of the computer hardware or software required to reduce it to readable form.

“Relating to” or “concerning” means and includes pertaining to, referring to, or having as a subject matter, directly or indirectly, expressly or implied, the subject matter of the specific request.

“Workpapers” are defined as original, electronic, machine-readable, unlocked, Excel format (where possible) with formulas intact.

PRIVILEGE

If you claim a privilege including, but not limited to, the attorney-client privilege or the work product doctrine, as grounds for not fully and completely responding to any interrogatory or request for production, describe the basis for your claim of privilege in sufficient detail so as to permit Sierra Club or the Commission to evaluate the validity of the claim. With respect to documents for which a privilege is claimed, produce a “privilege log” that identifies the author, recipient, date and subject matter of the documents or interrogatory answers for which you are

asserting a claim of privilege and any other information pertinent to the claim that would enable Sierra Club or the Commission to evaluate the validity of such claims.

TIME

Unless otherwise provided, the applicable time period for each of these requests for information is January 1, 2016, to the present.

REQUESTS FOR INFORMATION

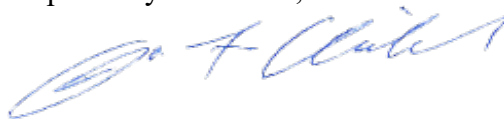
1. Please provide an unredacted copy of the IRP.
2. With respect to the EnCompass model, please provide the following output workbooks for all scenarios:
 - a. Resource Annual
 - b. Plan Costs
 - c. Company Annual
 - d. Company Annual Fuel (and Fixed Fuel, if applicable)
 - e. Company Annual Technology
 - f. Company Capital
 - g. Company Base Financials
3. Refer to IRP pp. 42-43, Section 6.B. With respect to the East Bend power plant in optimized portfolios, please explain whether the dates of retirement selected in various scenarios are endogenously derived. In other words, discuss whether Duke allows the model to select an optimal retirement year in each optimized portfolio, or whether the resulting retirement years are calculated externally to the EnCompass model. If the latter, please describe how retirement years are selected, and provided the workpapers associated with that calculation.
4. With respect to East Bend, please explain whether Duke assesses reduced capital requirements at the plant in years prior to retirement. If so, please provide Duke's assumptions with respect to reduced capital requirements; or if not, please explain why not.
 - a. Please provide annual capital incurred at East Bend in each optimized portfolio.

5. Refer to IRP p.16, stating: “to develop a more accurate forecast for rapidly developing technologies (e.g. solar PV and battery storage), the Company blended the AEO forecast factors with additional third-party capital cost projections.”
 - a. Please state which third-party capital cost projections were employed;
 - b. Provide workpapers used by DEP to blend AEO and third-party capital cost projections;
 - c. If the National Renewable Energy Laboratory's (NREL) Annual Technology Baseline (ATB) was not assessed or employed in assessing future capital costs or performance, please explain why.
 - d. Provide the effective load carrying capacity (ELCC) or UCAP of solar and wind facilities as employed in the study. If another method was used to assess capacity contribution, please describe the method and provide supporting workpapers.

6. Please specify any constraints used on new resource builds or existing resource retirements in any optimized scenario considered (e.g., MW of new resource per year, maximum resource availability).

Dated: October 1, 2021

Respectfully submitted,



Of counsel
(not licensed in Kentucky):

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Counsel for Sierra Club

CERTIFICATE OF SERVICE

This is to certify that the foregoing copy of SIERRA CLUB'S INITIAL REQUESTS FOR INFORMATION TO DUKE in this action is being electronically transmitted to the Commission on October 1, 2021; and that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding.



JOE F. CHILDERS