

VERIFICATION

STATE OF OHIO)
) SS:
COUNTY OF HAMILTON)

The undersigned, Adam S. Deller, Senior Engineer, being duly sworn, deposes and says that he has personal knowledge of the matters set forth in the foregoing data requests, and that the answers contained therein are true and correct to the best of his knowledge, information and belief.



Adam S. Deller, Affiant

Subscribed and sworn to before me by Adam S. Deller, on this 22nd day of October, 2021.



NOTARY PUBLIC



My Commission Expires: 08-04-2022

VERIFICATION

STATE OF NORTH CAROLINA)
) SS:
COUNTY OF MECKLENBURG)

The undersigned, David Raiford, Manager Accounting I, being duly sworn, deposes and says that he has personal knowledge of the matters set forth in the foregoing data requests and that the answers contained therein are true and correct to the best of his knowledge, information and belief.

David Raiford

David Raiford Affiant

Subscribed and sworn to before me by David Raiford on this 21st day of October, 2021.



Margaret R. Hayhurst

NOTARY PUBLIC

My Commission Expires:
July 24, 2026

VERIFICATION

STATE OF OHIO)
) SS:
COUNTY OF HAMILTON)

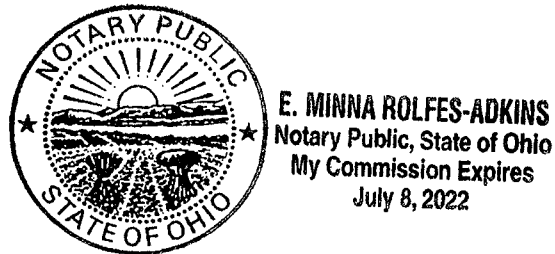
The undersigned, Theodore H. Czupik, Jr., Rates & Regulatory Strategy Manager, being duly sworn, deposes and says that he has personal knowledge of the matters set forth in the data requests, and that the answers contained therein are true and correct to the best of his knowledge, information and belief.

Theodore H. Czupik Jr.
Theodore H. Czupik, Jr., Affiant

Subscribed and sworn to before me by Theodore H. Czupik, Jr., on this 20th day of October, 2021.

E. Minna Rolfes-Adkins
NOTARY PUBLIC

My Commission Expires: July 8, 2022



KyPSC Case No. 2021-00290
TABLE OF CONTENTS

<u>DATA REQUEST</u>	<u>WITNESS</u>	<u>TAB NO.</u>
STAFF-DR-01-001	Adam Deller	1
STAFF-DR-01-002	Adam Deller	2
STAFF-DR-01-003	Adam Deller	3
STAFF-DR-01-004	Theodore H. Czupik, Jr. David Raiford	4

**Duke Energy Kentucky
Case No. 2021-00290
STAFF First Set Data Requests
Date Received: October 12, 2021**

STAFF-DR-01-001

REQUEST:

Refer to the Direct Testimony of Adam S. Deller (Deller Direct Testimony), Attachments ASD-1. Explain whether Duke Kentucky will track the East Landfill closure costs in enough detail to provide quarterly reports that compare the estimates with actuals in the categories provided in this exhibit.

RESPONSE:

Duke Energy Kentucky intends to track the percent complete for each line item in a document like Attachment ASD-1, as part of the methodology of determining applicable invoicing with the project contractor. If requested, Duke Energy Kentucky can provide a quarterly report, that compares the provided estimate with the actuals as a percent complete; to a location to be provided to Duke Energy Kentucky.

PERSON RESPONSIBLE: Adam S. Deller

**Duke Energy Kentucky
Case No. 2021-00290
STAFF First Set Data Requests
Date Received: October 12, 2021**

STAFF-DR-01-002

REQUEST:

Refer to the Deller Direct Testimony, attachment ASD-2 and ASD-3. Provide an explanation or justification for the post-closure care costs provided in ASD-2 and ASD-3.

RESPONSE:

The Company is required to perform post-closure maintenance related to ongoing environmental compliance at the East and West Landfills, as part of complying with the Kentucky Department for Environmental Protection (KDEP), Division of Waste Management (DWM) Solid Waste Permit, the United States Environmental Protection Agency's (U.S. EPA) Coal Combustion Residual rule (CCR Final Rule) and other Kentucky State rules. Post-closure activities include, but are not limited to, maintaining the cover system to remedy erosion rills and rodent burrows, mowing the cover system and landfill surface water ditches, dust control in and around the landfill, road and ditch maintenance, over-seed and mulch, groundwater monitoring, groundwater well maintenance, and inspection and reporting.

PERSON RESPONSIBLE: Adam S. Deller

**Duke Energy Kentucky
Case No. 2021-00290
STAFF First Set Data Requests
Date Received: October 12, 2021**

STAFF-DR-01-003

REQUEST:

Refer to the Deller Direct Testimony, Attachment ASD-3. Provide an itemized estimate of Routine Maintenance.

RESPONSE:

Please see STAFF-DR-01-003 Attachment for an itemized estimate of Routine Maintenance.

PERSON RESPONSIBLE: Adam S. Deller

**Post Closure Cost Estimate
 West Landfill, East Bend Station
 Adjusted to 2021 \$'s**

	Unit Cost	Unit		
			Quantity	Cost
Groundwater Monitoring	\$75,000	Lump		\$75,000
Well Monitoring	\$206,000	Lump		\$206,000
Mowing	\$200	Acre	300	\$60,000
Road and Ditch Maintenance	\$150,000	Lump		\$150,000
Surface Water controls and features	\$150,000	Lump		\$150,000
Soil Cover install	\$250,000	Lump		\$250,000
Erosion remediations	\$100.00	cy	750	\$75,000
Overseeding and Mulch	\$6,000	Acre	6.5	\$39,000
Inspections and reporting	\$5,000	Each	4	\$20,000
			Estimated Annual Totals	<u>\$1,025,000</u>

Duke Energy Kentucky
Case No. 2021-00290
STAFF First Set Data Requests
Date Received: October 12, 2021

STAFF-DR-01-004

REQUEST:

Refer to the Application, paragraph 15 and the Direct Testimony of Theodore H. Czupik, Jr., page 5, lines 12-16.

- a. State whether the ongoing maintenance costs or associated Asset Retirement Obligation (ARO) for the West Landfill are currently incurred by Duke Kentucky. If so, explain how these costs are currently accounted for by Duke Kentucky.
- b. Confirm that Duke Kentucky does not currently recover any ongoing maintenance costs or associated ARO for the West Landfill in base rates. If this cannot be confirmed, provide the amount of those costs recovered in base rates.

RESPONSE:

- a. Yes, Duke Kentucky is currently incurring ongoing maintenance costs for the West Landfill. As noted in the Direct Testimony of David G. Raiford, the Company has previously received approval for the creation of its coal-ash related AROs in Case No. 2015-00187, which included deferral treatment of Coal Combustion Residual (CCR) Compliance Costs to a regulatory asset. Duke Kentucky has been recovering ongoing maintenance costs, as well as certain other costs related to the West Landfill, in its Rider ESM in the second month after they have been incurred, consistent with language in the Order in Case No. 2017-00321, in which Rider ESM was established.
- b. Ongoing maintenance and other ARO costs for the West Landfill are not recovered in base rates.

PERSON RESPONSIBLE:

David G. Raiford
Theodore H. Czupik Jr.