

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

| | | |
|------------------------------------|---|---------------------|
| ELECTRONIC EXAMINATION OF THE |) | |
| APPLICATION OF THE FUEL ADJUSTMENT |) | |
| CLAUSE OF DUKE ENERGY KENTUCKY, |) | Case No. 2022-00040 |
| INC. FROM MAY 1, 2021 THROUGH |) | |
| OCTOBER 31, 2021 |) | |

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 MARCH 31, 2022

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 responses to Data Request Nos. 4 and 5, as requested by Commission Staff (Staff) in this case on March 31, 2022. 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 Nos. 4 and 5 contain sensitive information, the disclosure of which would injure Duke Energy Kentucky and its competitive position and business interests. 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, is not on file with any public agency in the manner as is provided in response to these Commission-issued data requests. The Confidential Information is not available from any commercial or other source outside of Duke Energy Kentucky. Additionally, the aforementioned Confidential Information is distributed within Duke Energy Kentucky only to those who must have access for business reasons and is generally recognized as confidential and proprietary in the energy industry.

5. The Confidential Information for which Duke Energy Kentucky is seeking confidential treatment is not known outside of Duke Energy Corporation.

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

7. 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*, 904 S.W.2d 766, 768 (Ky. 1995).

8. 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.

9. 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.

10. 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/Larisa M. Vaysman

Larisa M. Vaysman (98944)

Senior Counsel

Duke Energy Business Services LLC

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Cincinnati, Ohio 45202

Phone: (513) 287-4010

Fax: (513) 287-4385

E-mail: larisa.vaysman@duke-energy.com

Counsel for Duke Energy Kentucky, Inc.

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 April 14, 2022; and that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding.

/s/Larisa M. Vaysman

Larisa M. Vaysman

VERIFICATION

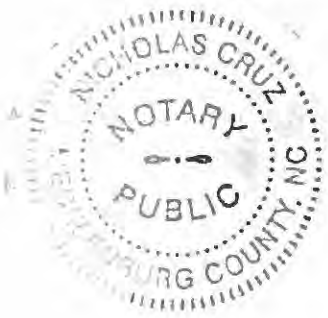
STATE OF NORTH CAROLINA)
) SS:
COUNTY OF MECKLENBURG)

The undersigned, Brad Daniel, Director, Generation Dispatch and Operations, 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.

Brad Daniel

Brad Daniel, Affiant

Subscribed and sworn to before me by ~~Brad Daniel~~ on this 12 day of James Bradley Daniel
Apr, 2022.



Nicholas Cruz


NOTARY PUBLIC

My Commission Expires: Feb 4, 2023

VERIFICATION

STATE OF OHIO)
)
COUNTY OF HAMILTON) SS:

The undersigned, Libbie S. Miller, Rates & Regulatory Strategy Manager, being duly sworn, deposes and says that she 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 her knowledge, information and belief.



Libbie S. Miller Affiant

Subscribed and sworn to before me by Libbie S. Miller on this 6th day of April, 2022.



NOTARY PUBLIC

My Commission Expires: ^{enra} July 8, 2022



E. MINNA ROLFES-ADKINS
Notary Public, State of Ohio
My Commission Expires
July 8, 2022

VERIFICATION

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

The undersigned, Tiffany Weir, Director Rates & Regulatory Filings, being duly sworn, deposes and says that she 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 her knowledge, information and belief.



Tiffany Weir, Affiant

Subscribed and sworn to before me by Tiffany Weir on this 11 day of April,
2022.



NOTARY PUBLIC

My Commission Expires:

SHAMALE M WILSON
Notary Public, North Carolina
Mecklenburg County
My Commission Expires
July 06, 2026

KyPSC Case No. 2022-00040
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**Duke Energy Kentucky
Case No. 2022-00040
STAFF First Set Data Requests
Date Received: March 31, 2022**

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 May 1, 2021 through October 31, 2021, please see STAFF-DR-01-001 Attachment.

PERSON RESPONSIBLE: Kimberly Hughes

Duke Energy Kentucky
Case No. 2022-00040 - Staff First Set Data Requests
Coal purchased May 1, 2021 - October 31, 2021

| <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 | 202,267 | Contract | DEK 33073 | 2/25/2019 | |
| Knighthawk | 158,377 | Contract | DEK 33097 | 2/25/2019 | |
| Central Coal Co | 221,461 | Contract | DEK33982 | 2/7/2020 | |
| Alliance Coal LLC | 74,990 | Spot | DEK 34548 | 3/8/2022 | |
| Total | 657,094 | | | | |
| | 89% | Contract | | | |
| | 11% | Spot | | | |
| | 100% | Total | | | |

Duke Energy Kentucky
Case No. 2022-00040
STAFF First Set Data Requests
Date Received: March 31, 2022

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 review period, and
- g. The current price paid per ton.

RESPONSE:

- a. 33097
- b. Knight Hawk Coal LLC
- c. Knight Hawk's Prairie Eagle Mine, IL
- d. Barge
- e. 158,377
- f. 201,096
- g. \$40.80

- a. 33073
 - b. Alliance Coal, LLC
 - c. Tunnel Ridge, Ohio County, WV
 - d. Barge
 - e. 202,267
 - f. 157,500
 - g. \$40.00
-
- a. 33982
 - b. Central Coal Company as agent for Knight Hawk Coal, LLC
 - c. Knight Hawk's Prairie Eagle Mine, IL
 - d. Barge
 - e. 221,461
 - f. 237,795
 - g. \$34.25

PERSON RESPONSIBLE: Kimberly Hughes

Duke Energy Kentucky
Case No. 2022-00040
STAFF First Set Data Requests
Date Received: March 31, 2022

STAFF-DR-01-003

REQUEST:

As of the last day of the review period:

- a. State the coal inventory level in tons and number of days' supply. Provide this information by generating station and in the aggregate.
- b. Describe the criteria used to determine the number of days' supply.
- c. State the target coal inventory level for each generating station and the total system.
- d. If actual cost 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 October 31, 2021 was 235,433 tons, or 36 days. This total inventory is for East Bend Station, which is the only coal-fired generating station in the Duke Energy Kentucky fleet.
- 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 36 days on October 31, 2021, 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: Tiffany Weir

**Duke Energy Kentucky
Case No. 2022-00040
STAFF First Set Data Requests
Date Received: March 31, 2022**

**PUBLIC STAFF-DR-01-004
(As to Attachments only)**

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

RESPONSE:

CONFIDENTIAL PROPRIETARY TRADE SECRET (As to Attachments only)

- a. Duke Energy issued two written solicitations, one in July 2021 for Q4 of 2021 and Q1 of 2022, and one in September of 2021 requesting proposals for coal to be delivered from 2022 through 2024. The quantity in the solicitation was not limited as the Company requested proposals for the full amounts of spot and term purchases the vendors could offer which enabled the Company to make decisions regarding the amounts to be purchased after evaluations were completed.

- b. The July 2021 coal solicitation was sent to 24 vendors with 19 vendors providing 30 bids and 5 bids selected for spot purchase by Duke Energy Kentucky. The September 2021 coal solicitation was sent to 83 vendors with 24 vendors providing 30 bids and 5 bids selected for term purchase by Duke Energy Kentucky. Please see STAFF-DR-01-004 Confidential Attachment 1 and 2 containing the proposal evaluation rankings.

PERSON RESPONSIBLE: Kim Hughes

**CONFIDENTIAL PROPRIETARY TRADE
SECRET**

**STAFF-DR-01-004 CONFIDENTIAL
ATTACHMENT 1**

FILED UNDER SEAL

**CONFIDENTIAL PROPRIETARY TRADE
SECRET**

**STAFF-DR-01-004 CONFIDENTIAL
ATTACHMENT 2**

FILED UNDER SEAL

**Duke Energy Kentucky
Case No. 2022-00040
STAFF First Set Data Requests
Date Received: March 31, 2022**

**PUBLIC STAFF-DR-01-005
(As to Attachment only)**

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 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 vendors who made offers.) State the reasons for each selection.

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

RESPONSE:

CONFIDENTIAL PROPRIETARY TRADE SECRET (As to Attachment only)

- a. Duke Energy issued one oral coal supply solicitation during June 2021 requesting proposals for coal to be delivered beginning in the summer of 2021. The solicitation was a phone solicitation due to higher than expected coal burns that occurred during the spring of 2021. The quantity and quality in the solicitation was not limited as the Company requested proposals for the full amounts of spot purchases the vendors could offer which enabled the Company to make decisions regarding the amounts to be purchased after evaluations were completed.

- b. The June 2021 oral coal solicitation was a phone solicitation to 16 vendors with 7 vendors providing 8 bids and 1 bid selected for spot purchase by Duke Energy Kentucky. Please see STAFF-DR-01-005 Confidential Attachment containing the proposal evaluation rankings.

PERSON RESPONSIBLE: Kimberly Hughes

**CONFIDENTIAL PROPRIETARY TRADE
SECRET**

**STAFF-DR-01-005 CONFIDENTIAL
ATTACHMENT**

FILED UNDER SEAL

**Duke Energy Kentucky
Case No. 2022-00040
STAFF First Set Data Requests
Date Received: March 31, 2022**

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 May 1, 2021 to October 31, 2021.

PERSON RESPONSIBLE: Jim McClay

Duke Energy Kentucky - Physical Natural Gas Purchases
May 1, 2021 - October 31, 2021

| Spot/Contract | Counterpart | Start Date | End Date | Buy/Sell | Qty | Qty UOM |
|---------------|---------------------------------------|------------|-----------|----------|--------|---------|
| Spot | Eco Energy Nat Gas | 20-May-21 | 20-May-21 | Buy | 5,000 | MMBtu |
| Spot | Eco Energy Nat Gas | 20-May-21 | 20-May-21 | Buy | 3,000 | MMBtu |
| Spot | Twin Eagle Resource Management, LLC | 21-May-21 | 21-May-21 | Buy | 12,000 | MMBtu |
| Spot | Eco Energy Nat Gas | 22-May-21 | 22-May-21 | Buy | 15,000 | MMBtu |
| Spot | Twin Eagle Resource Management, LLC | 22-May-21 | 22-May-21 | Buy | 12,000 | MMBtu |
| Spot | Eco Energy Nat Gas | 22-May-21 | 22-May-21 | Buy | 10,000 | MMBtu |
| Spot | Tenaska | 23-May-21 | 24-May-21 | Buy | 30,000 | MMBtu |
| Spot | Eco Energy Nat Gas | 23-May-21 | 23-May-21 | Buy | 25,000 | MMBtu |
| Spot | Eco Energy Nat Gas | 23-May-21 | 23-May-21 | Buy | 6,000 | MMBtu |
| Spot | Twin Eagle Resource Management, LLC | 24-May-21 | 23-May-21 | Buy | 5,000 | MMBtu |
| Spot | Eco Energy Nat Gas | 24-May-21 | 24-May-21 | Buy | 12,000 | MMBtu |
| Spot | Eco Energy Nat Gas | 25-May-21 | 25-May-21 | Buy | 5,000 | MMBtu |
| Spot | Eco Energy Nat Gas | 25-May-21 | 25-May-21 | Buy | 14,000 | MMBtu |
| Spot | Eco Energy Nat Gas | 27-May-21 | 27-May-21 | Buy | 20,000 | MMBtu |
| Spot | NJR Energy Servic G | 4-Jun-21 | 4-Jun-21 | Buy | 5,000 | MMBtu |
| Spot | Eco Energy Nat Gas | 4-Jun-21 | 4-Jun-21 | Buy | 11,000 | MMBtu |
| Spot | Tenaska | 8-Jun-21 | 8-Jun-21 | Buy | 10,000 | MMBtu |
| Spot | Eco Energy Nat Gas | 9-Jun-21 | 9-Jun-21 | Buy | 11,000 | MMBtu |
| Spot | Eco Energy Nat Gas | 10-Jun-21 | 10-Jun-21 | Buy | 16,000 | MMBtu |
| Spot | Eco Energy Nat Gas | 27-Jun-21 | 27-Jun-21 | Buy | 8,000 | MMBtu |
| Spot | Twin Eagle Resource Management, LLC | 28-Jun-21 | 28-Jun-21 | Buy | 5,000 | MMBtu |
| Spot | Twin Eagle Resource Management, LLC | 28-Jun-21 | 28-Jun-21 | Buy | 5,000 | MMBtu |
| Spot | Eco Energy Nat Gas | 28-Jun-21 | 28-Jun-21 | Buy | 9,000 | MMBtu |
| Spot | Eco Energy Nat Gas | 29-Jun-21 | 29-Jun-21 | Buy | 10,000 | MMBtu |
| Spot | Eco Energy Nat Gas | 29-Jun-21 | 29-Jun-21 | Buy | 5,000 | MMBtu |
| Spot | Eco Energy Nat Gas | 5-Jul-21 | 5-Jul-21 | Buy | 8,000 | MMBtu |
| Spot | Direct Energy Business Marketing, LLC | 5-Jul-21 | 5-Jul-21 | Buy | 7,000 | MMBtu |
| Spot | Direct Energy Business Marketing, LLC | 6-Jul-21 | 6-Jul-21 | Buy | 5,000 | MMBtu |
| Spot | Eco Energy Nat Gas | 6-Jul-21 | 6-Jul-21 | Buy | 10,000 | MMBtu |
| Spot | Eco Energy Nat Gas | 7-Jul-21 | 7-Jul-21 | Buy | 12,146 | MMBtu |
| Spot | NJR Energy Servic G | 14-Jul-21 | 14-Jul-21 | Buy | 8,000 | MMBtu |
| Spot | Direct Energy Business Marketing, LLC | 19-Jul-21 | 19-Jul-21 | Buy | 5,000 | MMBtu |
| Spot | NJR Energy Servic G | 26-Jul-21 | 26-Jul-21 | Buy | 5,000 | MMBtu |

Duke Energy Kentucky - Physical Natural Gas Purchases
May 1, 2021 - October 31, 2021

| Spot/Contract | Counterpart | Start Date | End Date | Buy/Sell | Qty | Qty UOM |
|---------------|---------------------------------------|------------|-----------|----------|--------|---------|
| Spot | Direct Energy Business Marketing, LLC | 26-Jul-21 | 26-Jul-21 | Buy | 6,000 | MMBtu |
| Spot | Eco Energy Nat Gas | 26-Jul-21 | 26-Jul-21 | Buy | 3,000 | MMBtu |
| Spot | Eco Energy Nat Gas | 27-Jul-21 | 28-Jul-21 | Buy | 5,000 | MMBtu |
| Spot | Eco Energy Nat Gas | 29-Jul-21 | 29-Jul-21 | Buy | 5,000 | MMBtu |
| Spot | Eco Energy Nat Gas | 31-Jul-21 | 31-Jul-21 | Buy | 18,000 | MMBtu |
| Spot | NJR Energy Servic G | 5-Aug-21 | 6-Aug-21 | Buy | 5,000 | MMBtu |
| Spot | Eco Energy Nat Gas | 5-Aug-21 | 6-Aug-21 | Buy | 5,000 | MMBtu |
| Spot | Eco Energy Nat Gas | 5-Aug-21 | 5-Aug-21 | Buy | 5,000 | MMBtu |
| Spot | Twin Eagle Resource Management, LLC | 5-Aug-21 | 5-Aug-21 | Buy | 10,000 | MMBtu |
| Spot | Twin Eagle Resource Management, LLC | 6-Aug-21 | 6-Aug-21 | Buy | 10,000 | MMBtu |
| Spot | Eco Energy Nat Gas | 6-Aug-21 | 6-Aug-21 | Buy | 5,000 | MMBtu |
| Spot | Eco Energy Nat Gas | 6-Aug-21 | 6-Aug-21 | Buy | 5,000 | MMBtu |
| Spot | Direct Energy Business Marketing, LLC | 9-Aug-21 | 9-Aug-21 | Buy | 5,000 | MMBtu |
| Spot | Twin Eagle Resource Management, LLC | 18-Aug-21 | 18-Aug-21 | Buy | 10,000 | MMBtu |
| Spot | Eco Energy Nat Gas | 18-Aug-21 | 18-Aug-21 | Buy | 4,000 | MMBtu |
| Spot | Eco Energy Nat Gas | 19-Aug-21 | 19-Aug-21 | Buy | 10,000 | MMBtu |
| Spot | Eco Energy Nat Gas | 19-Aug-21 | 19-Aug-21 | Buy | 6,000 | MMBtu |
| Spot | Twin Eagle Resource Management, LLC | 19-Aug-21 | 19-Aug-21 | Buy | 5,000 | MMBtu |
| Spot | Direct Energy Business Marketing, LLC | 20-Aug-21 | 20-Aug-21 | Buy | 8,000 | MMBtu |
| Spot | Eco Energy Nat Gas | 20-Aug-21 | 20-Aug-21 | Buy | 15,000 | MMBtu |
| Spot | Eco Energy Nat Gas | 20-Aug-21 | 20-Aug-21 | Buy | 8,000 | MMBtu |
| Spot | Twin Eagle Resource Management, LLC | 20-Aug-21 | 20-Aug-21 | Buy | 5,000 | MMBtu |
| Spot | Eco Energy Nat Gas | 21-Aug-21 | 21-Aug-21 | Buy | 15,000 | MMBtu |
| Spot | Eco Energy Nat Gas | 23-Aug-21 | 23-Aug-21 | Buy | 5,000 | MMBtu |
| Spot | Twin Eagle Resource Management, LLC | 23-Aug-21 | 23-Aug-21 | Buy | 6,000 | MMBtu |
| Spot | Direct Energy Business Marketing, LLC | 24-Aug-21 | 25-Aug-21 | Buy | 10,000 | MMBtu |
| Spot | Eco Energy Nat Gas | 24-Aug-21 | 24-Aug-21 | Buy | 16,000 | MMBtu |
| Spot | Eco Energy Nat Gas | 24-Aug-21 | 25-Aug-21 | Buy | 6,000 | MMBtu |
| Spot | Eco Energy Nat Gas | 25-Aug-21 | 26-Aug-21 | Buy | 10,000 | MMBtu |
| Spot | Eco Energy Nat Gas | 14-Sep-21 | 14-Sep-21 | Buy | 10,000 | MMBtu |
| Spot | Eco Energy Nat Gas | 14-Sep-21 | 14-Sep-21 | Buy | 8,000 | MMBtu |
| Spot | Tenaska | 27-Sep-21 | 27-Sep-21 | Buy | 10,000 | MMBtu |

Duke Energy Kentucky - Physical Natural Gas Purchases
May 1, 2021 - October 31, 2021

| Spot/Contract | Counterpart | Start Date | End Date | Buy/Sell | Qty | Qty UOM |
|----------------------|--|-------------------|-----------------|-----------------|------------|----------------|
| Spot | Tenaska | 4-Oct-21 | 4-Oct-21 | Buy | 5,000 | MMBtu |
| Spot | Eco Energy Nat Gas | 4-Oct-21 | 4-Oct-21 | Buy | 10,000 | MMBtu |
| Spot | Eco Energy Nat Gas | 4-Oct-21 | 4-Oct-21 | Buy | 14,000 | MMBtu |
| Spot | Direct Energy Business Marketing, LLC | 9-Oct-21 | 9-Oct-21 | Buy | 8,000 | MMBtu |
| Spot | Twin Eagle Resource Management, LLC | 12-Oct-21 | 12-Oct-21 | Buy | 10,000 | MMBtu |

**Duke Energy Kentucky
Case No. 2022-00040
STAFF First Set Data Requests
Date Received: March 31, 2022**

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:

Because of Woodsdale station's dual fuel capability, for the period under review there were no 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. Although Woodsdale encountered occasional pipeline constraints and unavailability of natural gas, these issues did not prevent it from operating because the units were able to run on oil during those times. There have been occasional issues with pipeline gas pressure or TETCO issued Operational Flow Orders ("OFO") that have resulted in the necessity to utilize Woodsdale station's dual fuel capability, which allows the units to be available to run on oil when there is an interruption or constraint in gas supply.

PERSON RESPONSIBLE:

John Swez
Brad Daniel

**Duke Energy Kentucky
Case No. 2022-00040
STAFF First Set Data Requests
Date Received: March 31, 2022**

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: Tiffany Weir

**Duke Energy Kentucky
Case No. 2022-00040
STAFF First Set Data Requests
Date Received: March 31, 2022**

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 May 1, 2021 through October 31, 2021.

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 May 1, 2021 through October 31, 2021.

PERSON RESPONSIBLE: Tiffany Weir

REQUEST:

- a. State whether Duke Kentucky is currently involved in any litigation with its current or former fuel suppliers or transportation vendors. If so, 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 an 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: Tiffany Weir

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, Natural Gas, and Fuel Oil

- a. The document in response to (b) below remained unchanged during the period under review.
- b. There were no changes to the **Regulated Utilities Risk Management Control Manual**. The Regulated Utilities Risk Management Control Manual was updated and approved on January 7, 2021. The "Regulated Utilities Risk Management Control Manual" document was submitted with the Company's responses to Staff's requests for information in Case No. 2021-00296.

There were no changes to the **Regulated Electric Risk Limits**. The Regulated Electric Risk Limits were updated in January of 2020. This document was submitted with the Company's responses to Commission Staff's First Request for Information in Case No. 2021-00057.

Coal

- a. The procedures in response to (b) below remained unchanged during the period under review.
- b. There were no changes to the **Coal and Reagents Procedure**. The Coal and Reagents Procedures was updated on March 1, 2021. This document was submitted with the Company's responses to Commission Staff's First Request for Information in Case No. 2021-00296.

Natural Gas & Fuel Oil

- a. The procedures in response to (b) below remained unchanged during the period under review.
- b. The 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 Commission Staff's First Requests for Information in Case No. 2017-00005. The "DEI and DEK Gas Trading Procedure for Off-Premise Transactions" was updated in June 2019 and it was submitted with the Company's responses to Commission Staff's First Requests for Information in Case No. 2020-00008.

PERSON RESPONSIBLE: Tiffany Weir

**Duke Energy Kentucky
Case No. 2022-00040
STAFF First Set Data Requests
Date Received: March 31, 2022**

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. 2022-00040
STAFF First Set Data Requests
Date Received: March 31, 2022**

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 May 31,2021 | | | | | | | |
| PJM Interconnection, LLC | Economy Sales | 42,243,360 | | 1,152,394 | 499,746 | 1,652,140 | |
| | Total Sales | <u>42,243,360</u> | <u>0</u> | <u>1,152,394</u> | <u>499,746</u> | <u>1,652,140</u> | |
| Month Ended June 30,2021 | | | | | | | |
| PJM Interconnection, LLC | Economy Sales | 24,019,900 | | 601,676 | 303,616 | 905,292 | |
| | Total Sales | <u>24,019,900</u> | <u>0</u> | <u>601,676</u> | <u>303,616</u> | <u>905,292</u> | |
| Month Ended July 31,2021 | | | | | | | |
| PJM Interconnection, LLC | Economy Sales | 12,048,840 | | 308,671 | 156,878 | 465,549 | |
| | Total Sales | <u>12,048,840</u> | <u>0</u> | <u>308,671</u> | <u>156,878</u> | <u>465,549</u> | |
| Month Ended August 31,2021 | | | | | | | |
| PJM Interconnection, LLC | Economy Sales | 20,342,280 | | 566,442 | 506,381 | 1,072,823 | |
| | Total Sales | <u>20,342,280</u> | <u>0</u> | <u>566,442</u> | <u>506,381</u> | <u>1,072,823</u> | |
| Month Ended September 30,2021 | | | | | | | |
| PJM Interconnection, LLC | Economy Sales | 5,689,430 ^(a) | | 94,083 | 97,486 | 191,569 | |
| | Total Sales | <u>5,689,430</u> | <u>0</u> | <u>94,083</u> | <u>97,486</u> | <u>191,569</u> | |
| Month Ended October 31,2021 | | | | | | | |
| PJM Interconnection, LLC | Economy Sales | 0 ^(a) | | (30,407) ^(b) | 30,407 | 0 | |
| | Total Sales | <u>0</u> | <u>0</u> | <u>(30,407)</u> | <u>30,407</u> | <u>0</u> | |

Notes:

^(a) East Bend was on a planned maintenance outage from mid-September through the latter half of December

^(b) Accounting adjustment due to annual coal pile survey

**Duke Energy Kentucky
Case No. 2022-00040
STAFF First Set Data Requests
Date Received: March 31, 2022**

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. 2022-00040
STAFF First Set Data Requests
Date Received: March 31, 2022**

STAFF-DR-01-015

REQUEST:

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

RESPONSE:

Please see STAFF-DR-01-015 Attachment.

PERSON RESPONSIBLE: Brad Daniel

| Unit Name | Event Type | Month | Scheduled Hours | Forced Hours | Actual Hours | Event Duration Hours | Event Start | Event End | Description |
|---------------|------------|-----------|-----------------|--------------|--------------|----------------------|------------------|------------------|--|
| East Bend 2 | PE | May | 159.07 | | 159.07 | 159.07 | 5/3/2021 6:00 | 5/9/2021 21:04 | 2021 Spring Planned Outage Extension: 2-2 PA Fan Shaft and Bearing Repairs |
| East Bend 2 | U1 | July | | 40.6 | 40.6 | 40.6 | 7/29/2021 3:14 | 7/30/2021 19:50 | SFC Unable to Pull Ash |
| East Bend 2 | U1 | August | | 63.13 | 63.13 | 63.13 | 8/2/2021 19:06 | 8/5/2021 10:14 | 2-1 BFPT Manual Valve Leaking |
| East Bend 2 | U1 | August | | 183.5 | 183.5 | 183.5 | 8/28/2021 19:00 | 9/5/2021 10:30 | Generator Flex Links and A-phase Bushing |
| East Bend 2 | U1 | September | | 1.73 | 1.73 | 1.73 | 9/5/2021 11:14 | 9/5/2021 12:58 | Trip on boiler drum level. |
| East Bend 2 | U1 | September | | 1.6 | 1.6 | 1.6 | 9/5/2021 13:06 | 9/5/2021 14:42 | Trip on boiler drum level. |
| East Bend 2 | PO | September | 1705.97 | | 1705.97 | 1705.97 | 9/10/2021 23:02 | 11/21/2021 0:00 | Planned Fall Outage |
| Woodsdale CT1 | MO | May | 33.53 | | 33.53 | 33.53 | 5/4/2021 6:30 | 5/5/2021 16:02 | <OMC!> Replace Switchyard Breaker 1521 |
| Woodsdale CT1 | U1 | June | | 1561.23 | 1561.23 | 1561.23 | 6/10/2021 10:15 | 8/14/2021 11:29 | Forced Outage-Turbine Blade Damage |
| Woodsdale CT1 | PO | September | 105.5 | | 105.5 | 105.5 | 9/13/2021 6:00 | 9/17/2021 15:30 | Replace Annunciator on Transformer Bank 39. |
| Woodsdale CT2 | MO | May | 33.53 | | 33.53 | 33.53 | 5/4/2021 6:30 | 5/5/2021 16:02 | <OMC!> Replace Switchyard Breaker 1521 |
| Woodsdale CT2 | SF | June | | 0.73 | 0.73 | 0.73 | 6/4/2021 15:56 | 6/4/2021 16:40 | Synchronizer Failure |
| Woodsdale CT2 | MO | July | 0.68 | | 0.68 | 0.68 | 7/1/2021 11:35 | 7/1/2021 12:16 | Made unit unavailable to safely lift GT1 parts over units |
| Woodsdale CT2 | SF | August | | 21.47 | 21.47 | 21.47 | 8/17/2021 13:50 | 8/18/2021 11:18 | Power Oil Breaker won't close |
| Woodsdale CT2 | PO | September | 103 | | 103 | 103 | 9/13/2021 6:00 | 9/17/2021 13:00 | Transformer Bank 39 Annunciator Outage |
| Woodsdale CT3 | MO | May | 33.53 | | 33.53 | 33.53 | 5/4/2021 6:30 | 5/5/2021 16:02 | <OMC!> Replace Switchyard Breaker 1521 |
| Woodsdale CT3 | PO | May | 171.85 | | 171.85 | 171.85 | 5/15/2021 6:00 | 5/22/2021 9:51 | Spring Prep and Boroscope Inspection |
| Woodsdale CT3 | PO | May | 1.55 | | 1.55 | 1.55 | 5/22/2021 9:57 | 5/22/2021 11:30 | Spring Prep and Boroscope Inspection |
| Woodsdale CT3 | MO | July | 0.68 | | 0.68 | 0.68 | 7/1/2021 11:35 | 7/1/2021 12:16 | Made unit unavailable to safely lift GT1 parts over units |
| Woodsdale CT3 | PO | September | 177.05 | | 177.05 | 177.05 | 9/18/2021 6:00 | 9/25/2021 15:03 | TB40 annunciator outage, replace fuel valve |
| Woodsdale CT3 | U1 | September | | 18.03 | 18.03 | 18.03 | 9/27/2021 18:00 | 9/28/2021 12:02 | Leak on NG Stop Valve Relief Valve |
| Woodsdale CT4 | MO | May | 33.53 | | 33.53 | 33.53 | 5/4/2021 6:30 | 5/5/2021 16:02 | <OMC!> Replace Switchyard Breaker 1521 |
| Woodsdale CT4 | PO | May | 171.15 | | 171.15 | 171.15 | 5/15/2021 6:00 | 5/22/2021 9:09 | Spring Prep and Boroscope Inspection |
| Woodsdale CT4 | MO | July | 0.68 | | 0.68 | 0.68 | 7/1/2021 11:35 | 7/1/2021 12:16 | Made unit unavailable to safely lift GT1 parts over units |
| Woodsdale CT4 | PO | September | 176.42 | | 176.42 | 176.42 | 9/18/2021 6:00 | 9/25/2021 14:25 | TB40 annunciator outage, stack repairs |
| Woodsdale CT5 | PO | May | 1.63 | | 1.63 | 1.63 | 5/27/2021 9:15 | 5/27/2021 10:53 | Generator Rewind Outage |
| Woodsdale CT5 | MO | June | 2.58 | | 2.58 | 2.58 | 6/7/2021 6:30 | 6/7/2021 9:05 | Made GT5 unavailable to finish SFC work on GT6 |
| Woodsdale CT5 | SF | June | | 0.95 | 0.95 | 0.95 | 6/27/2021 16:47 | 6/27/2021 17:44 | Gen Breaker SF6 Gas Low |
| Woodsdale CT5 | MO | July | 0.68 | | 0.68 | 0.68 | 7/1/2021 11:35 | 7/1/2021 12:16 | Made unit unavailable to safely lift GT1 parts over units |
| Woodsdale CT5 | U1 | July | | 3.8 | 3.8 | 3.8 | 7/27/2021 17:24 | 7/27/2021 21:12 | Tripped; faulty exhause Thermocouple |
| Woodsdale CT5 | U1 | August | | 163.02 | 163.02 | 163.02 | 8/27/2021 12:41 | 9/3/2021 7:42 | Fire Alarm-Heat Detected Trip-Unit Unavailable. |
| Woodsdale CT6 | MO | July | 0.68 | | 0.68 | 0.68 | 7/1/2021 11:35 | 7/1/2021 12:16 | Made unit unavailable to safely lift GT1 parts over units |
| Woodsdale CT6 | SF | October | | 15.08 | 15.08 | 15.08 | 10/18/2021 19:04 | 10/19/2021 10:09 | Failed start; Synchronizer blocked |

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. 2022-00040
STAFF First Set Data Requests
Date Received: March 31, 2022**

STAFF-DR-01-016

REQUEST:

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

RESPONSE:

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> |
|--------------|----------------|---------------------|------------------|-----------------|----------------------------|
| May-21 | 250,711 | 744 | 600 | 446,400 | 56.16% |
| June-21 | 360,958 | 720 | 600 | 432,000 | 83.56% |
| July-21 | 329,547 | 744 | 600 | 446,400 | 73.82% |
| August-21 | 307,006 | 744 | 600 | 446,400 | 68.77% |
| September-21 | 56,073 | 720 | 600 | 432,000 | 12.98% |
| October-21 | <u>(3,171)</u> | <u>744</u> | <u>600</u> | <u>446,400</u> | <u>-0.71%</u> |
| Total | 1,301,124 | 4,416 | 600 | 2,649,600 | 49.11% |

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 | 6,373 | 4,416 | 80.67 | 356,352 | 1.79% |
| Unit 2 | 8,873 | 4,416 | 82.00 | 362,208 | 2.45% |
| Unit 3 | 8,172 | 4,416 | 82.00 | 362,208 | 2.26% |
| Unit 4 | 8,464 | 4,416 | 80.67 | 356,352 | 2.38% |
| Unit 5 | 5,128 | 4,416 | 82.00 | 362,208 | 1.42% |
| Unit 6 | <u>5,685</u> | <u>4,416</u> | <u>82.00</u> | <u>362,208</u> | <u>1.57%</u> |
| Total | 42,695 | 26,496 | 81.56 | 2,161,536 | 1.98% |

May-21

| 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 | 3,519 | 744 | 86 | 63,984 | 5.50% |
| Unit 2 | 3,532 | 744 | 86 | 63,984 | 5.52% |
| Unit 3 | 2,765 | 744 | 86 | 63,984 | 4.32% |
| Unit 4 | 2,771 | 744 | 86 | 63,984 | 4.33% |
| Unit 5 | 297 | 744 | 86 | 63,984 | 0.46% |
| Unit 6 | <u>(57)</u> | <u>744</u> | 86 | <u>63,984</u> | <u>-0.09%</u> |
| Total | 12,827 | 4,464 | 86 | 383,904 | 3.34% |

Jun-21

| 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 | 508 | 720 | 78 | 56,160 | 0.90% |
| Unit 2 | 1,552 | 720 | 80 | 57,600 | 2.69% |
| Unit 3 | 1,615 | 720 | 80 | 57,600 | 2.80% |
| Unit 4 | 1,626 | 720 | 78 | 56,160 | 2.90% |
| Unit 5 | 870 | 720 | 80 | 57,600 | 1.51% |
| Unit 6 | <u>1,411</u> | <u>720</u> | 80 | <u>57,600</u> | <u>2.45%</u> |
| Total | 7,582 | 4,320 | 79 | 342,720 | 2.21% |

Jul-21

| 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 | (78) | 744 | 78 | 58,032 | -0.13% |
| Unit 2 | 1,176 | 744 | 80 | 59,520 | 1.98% |
| Unit 3 | 1,005 | 744 | 80 | 59,520 | 1.69% |
| Unit 4 | 1,147 | 744 | 78 | 58,032 | 1.98% |
| Unit 5 | 1,059 | 744 | 80 | 59,520 | 1.78% |
| Unit 6 | <u>1,160</u> | <u>744</u> | 80 | <u>59,520</u> | <u>1.95%</u> |
| Total | 5,469 | 4,464 | 79 | 354,144 | 1.54% |

Aug-21

| 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 | 2,315 | 744 | 78 | 58,032 | 3.99% |
| Unit 2 | 2,536 | 744 | 80 | 59,520 | 4.26% |
| Unit 3 | 2,252 | 744 | 80 | 59,520 | 3.78% |
| Unit 4 | 2,407 | 744 | 78 | 58,032 | 4.15% |
| Unit 5 | 2,349 | 744 | 80 | 59,520 | 3.95% |
| Unit 6 | <u>2,806</u> | <u>744</u> | 80 | <u>59,520</u> | <u>4.71%</u> |
| Total | 14,665 | 4,464 | 79 | 354,144 | 4.14% |

Sep-21

| 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 | (29) | 720 | 78 | 56,160 | -0.05% |
| Unit 2 | (30) | 720 | 80 | 57,600 | -0.05% |
| Unit 3 | 385 | 720 | 80 | 57,600 | 0.67% |
| Unit 4 | 403 | 720 | 78 | 56,160 | 0.72% |
| Unit 5 | 392 | 720 | 80 | 57,600 | 0.68% |
| Unit 6 | <u>373</u> | <u>720</u> | 80 | <u>57,600</u> | <u>0.65%</u> |
| Total | 1,494 | 4,320 | 79 | 342,720 | 0.44% |

Oct-21

| 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 | 138 | 744 | 86 | 63,984 | 0.22% |
| Unit 2 | 107 | 744 | 86 | 63,984 | 0.17% |
| Unit 3 | 150 | 744 | 86 | 63,984 | 0.23% |
| Unit 4 | 110 | 744 | 86 | 63,984 | 0.17% |
| Unit 5 | 161 | 744 | 86 | 63,984 | 0.25% |
| Unit 6 | <u>(8)</u> | <u>744</u> | 86 | <u>63,984</u> | <u>-0.01%</u> |
| Total | 658 | 4,464 | 86 | 383,904 | 0.17% |

PERSON RESPONSIBLE:

John Swez
Libbie S. Miller

**Duke Energy Kentucky
Case No. 2022-00040
STAFF First Set Data Requests
Date Received: March 31, 2022**

STAFF-DR-01-017

REQUEST:

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. If so, describe the impact of these changes on Duke Kentucky's fuel usage.

RESPONSE:

During the period under review, there have been no changes to maintenance and operation practices or completions of any specific generation efficiency improvements that affect fuel usage at Duke Kentucky's generation facilities.

PERSON RESPONSIBLE: Brad Daniel

**Duke Energy Kentucky
Case No. 2022-00040
STAFF First Set Data Requests
Date Received: March 31, 2022**

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: Tiffany Weir

**Duke Energy Kentucky
Case No. 2022-00040
STAFF First Set Data Requests
Date Received: March 31, 2022**

STAFF-DR-01-019

REQUEST:

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

RESPONSE:

Pursuant to the March 24, 2022, Order of the Public Service Commission of the Commonwealth of Kentucky (Commission) in Case No. 2021-00296, Duke Energy Kentucky updated its Fuel Adjustment Clause (FAC) tariff to implement the revisions ordered by the Commission on April 1, 2022, with an effective date of April 4, 2022. Duke Energy Kentucky has followed this updated tariff language in its FAC calculation prior to and during the period under review even though the tariff sheet was updated only effective April 4, 2022. Except insofar as Duke Energy Kentucky needed to update the tariff language, Duke Kentucky is not aware of any violation of 807 KAR 5:056 that occurred prior to or during the period under review.

PERSON RESPONSIBLE: Libbie S. Miller

**Duke Energy Kentucky
Case No. 2022-00040
STAFF First Set Data Requests
Date Received: March 31, 2022**

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:

All contracts for fuel oil and fuel oil transportation contracts have been filed with the Commission.

PERSON RESPONSIBLE: Tiffany Weir

Duke Energy Kentucky
Case No. 2022-00040
STAFF First Set Data Requests
Date Received: March 31, 2022

STAFF-DR-01-021

REQUEST:

Refer to KRS 278.277(1) which states that:

In any review by the commission of any fuel adjustment clause, for any contracts entered into on or after July 1, 2021, the commission shall, in determining the reasonableness of fuel costs in procurement contracts and fuel procurement practices, evaluate the reasonableness of the 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 July 1, 2021.
- b. For each bid solicitation or potential spot purchases that resulted in a new purchase contract on or after July 1, 2021, provide the bid evaluation sheets that include:
 - 1) The coal severance tax rate being levied, in any;
 - 2) The coal severance tax rate per ton or MMBTU, as appropriate, is being levied;
 - 3) The cost per ton or MMBTU, as appropriate, including any severance tax;
and
 - 4) The cost per ton or MMBTU, as appropriate, excluding any severance tax.

RESPONSE:

a & b. Please see STAFF-DR-01-004 Confidential Attachments 1 and 2 for a listing of contracts entered into on or after July 1, 2021 and containing the proposal evaluations including: 1) the applicable state coal severance tax rate as published in the most recent

issue of Book of the States by the Council of State Governments; 2) the coal severance tax rate per ton or MMBTU; 3) the cost per ton or MMBTU including any severance tax; and, 4) the cost per ton or MMBTU excluding any severance tax.

PERSON RESPONSIBLE: Tiffany Weir