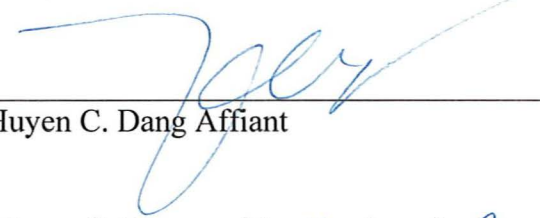


VERIFICATION

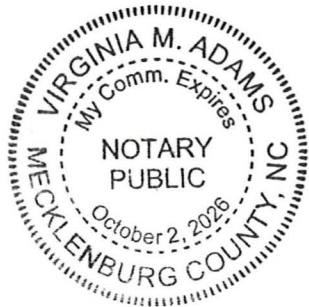
STATE OF NORTH CAROLINA)
) **SS:**
COUNTY OF MECKLENBURG)

The undersigned, Huyen C. Dang, Director of Accounting, being duly sworn, deposes and says that he has personal knowledge of the matters set forth in the foregoing post-hearing data requests, and that the answers contained therein are true and correct to the best of his knowledge, information and belief.



 Huyen C. Dang Affiant

Subscribed and sworn to before me by Huyen C. Dang on this 11 day of Apr 3
 2023.




 NOTARY PUBLIC

My Commission Expires: 10/2/26

VERIFICATION

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

The undersigned, Jean P. Williams, Manager DSM Analytics, being duly sworn, deposes and says that she has personal knowledge of the matters set forth in the foregoing post-hearing data requests, and that the answers contained therein are true and correct to the best of her knowledge, information and belief.

Jean P. Williams

Jean P. Williams, Affiant

Subscribed and sworn to before me by Jean P. Williams on this 14 day of April, 2023.

Carolina Perdomo
NOTARY PUBLIC
WAKE COUNTY, N.C.
My Commission Expires 03/12/2024

Carolina Perdomo

NOTARY PUBLIC

My Commission Expires: 03-12-2024

VERIFICATION

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

The undersigned, Melissa Adams, Director Analytics, 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.

Melissa Adams
Melissa Adams, Affiant

Subscribed and sworn to before me by Melissa Adams on this 14th day of April, 2023.



Ellen R. Davis
NOTARY PUBLIC

My Commission Expires: 2/21/2024

KyPSC Case No. 2022-00251
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Duke Energy Kentucky
Case No. 2022-00251
STAFF First Set Post-Hearing Data Requests
Date Received: April 4, 2023

STAFF-PHDR-01-001

REQUEST:

Refer to Duke Kentucky's AMI CPCN 2020 Annual Compliance Report, filed in the post-case correspondence file in Case No. 2016-00152¹ on July 23, 2020.

- a. Confirm the date installation of Duke Kentucky's Advanced Metering Infrastructure (AMI) began.
- b. Confirm the date installation of Duke Kentucky's AMI was completed.
- c. Provide the remaining depreciable life of the first group of meters installed.
- d. Provide the remaining depreciable life of the last group of meters installed.

RESPONSE:

- a. Installs began taking place the week beginning on August 28, 2017.
- b. Installations were completed the week ending on December 14, 2018.
- c. Based on the currently approved Depreciation Study in Case No. 2017-00321, all Duke Energy Kentucky's AMI meters are in the same group for depreciation purposes. AMI meters installed since the initial installation, which was completed on December 14, 2018, will continue to depreciate as long as new meters are placed into service until the whole group is fully depreciated. The total group of AMI meters are depreciating with a life rate of 6.85% which equates to an approximately 15 year expected

¹ Case No. 2016-00152, *In the Matter of the Application of Duke Energy Kentucky, Inc. for (1) Certificate of Public Convenience and Necessity Authorizing the Construction of an Advanced Metering Infrastructure; (2) Request for Accounting Treatment; and (3) All Other Necessary Waivers, Approvals, and Relief* (Ky. PSC May 25, 2017)

useful life; or 14.3 year life for composite remaining life. The composite remaining life will continue to evolve with each new meter that is added to the group.

- d. See response to (c) above.

PERSON RESPONSIBLE: Huyen C. Dang

**Duke Energy Kentucky
Case No. 2022-00251
STAFF First Set Post-Hearing Data Requests
Date Received: April 4, 2023**

**CONFIDENTIAL STAFF-PHDR-01-002
(As to Attachment only)**

REQUEST:

Refer to the Application, paragraph 13.

- a. Provide the EM&V report of the Summer 2022 research extension.

Consider this an ongoing request during the pendency of this proceeding.

- b. Provide any memo or summary of the results of the Summer 2022 research extension provided to Duke Kentucky by the EM&V vendor prior to presentation of the final EM&V report for the Summer 2022 research extension.

RESPONSE:

CONFIDENTIAL PROPRIETARY TRADE SECRET (As to Attachment only)

- a. The EM&V report of the Summer 2022 research extension is not yet available. The Company will supplement this response with the report as soon as it is available from the EM&V vendor.

- b. Please see STAFF-PHDR-01-002(b) Confidential Attachment for the memo summarizing the results of the Summer 2022 research extension. Please note that these results and analysis are preliminary and subject to further validation, and therefore the final report may contain different results and/or conclusions.

PERSON RESPONSIBLE: Jean Williams

**CONFIDENTIAL PROPRIETARY TRADE
SECRET**

**STAFF-POST HEARING-DR-01-002(b)
CONFIDENTIAL ATTACHMENT**

FILED UNDER SEAL

Duke Energy Kentucky
Case No. 2022-00251
STAFF First Set Post-Hearing Data Requests
Date Received: April 4, 2023

CONFIDENTIAL STAFF-PHDR-01-003
(As to Attachment only)

REQUEST:

Provide the actual and updated avoided energy, capacity, and T&D values based on the characteristics attributable to the generation unit(s) that are planned to replace Eastbend.

RESPONSE:

CONFIDENTIAL PROPRIETARY TRADE SECRET (As to Attachment only)

Please see STAFF-PHDR-01-003 Confidential Attachment for avoided costs as filed in the 2022 Annual DSM Application (Case No. 2022-00398). The Company has not performed a separate calculation specifically of actual and updated avoided energy, capacity, and T&D values based on the characteristics attributable to the generation unit(s) that are planned to replace Eastbend.

PERSON RESPONSIBLE: Melissa Adams

**CONFIDENTIAL PROPRIETARY TRADE
SECRET**

**STAFF-POST HEARING-DR-01-003
CONFIDENTIAL ATTACHMENT**

FILED UNDER SEAL

Duke Energy Kentucky
Case No. 2022-00251
STAFF First Set Post-Hearing Data Requests
Date Received: April 4, 2023

STAFF-PHDR-01-004

REQUEST:

Explain the methodology for the updated avoided energy, capacity, and T&D values as well as the sources used.

RESPONSE:

Avoided Costs are derived from a variety of sources listed below:

1. Avoided Energy - hourly forecast of PJM power prices based on the Spring 2021 Price Forecast as used in the KY 2021 IRP.
2. Avoided Capacity - The avoided cost for capacity follows an industry standard called the peaker method where the avoided cost of capacity is based on the cost of construction of a new peaker unit in 2021 dollars and escalated at 0.96% per year.
3. Avoided T&D – based on information provided by the Company’s Analytics department for cost of T&D upgrades related to load growth in 2020 dollars and escalated based on Moody’s Analytics Electric Power Distribution – East South Central Forecast.

PERSON RESPONSIBLE: Melissa Adams