#### VERIFICATION

STATE OF NORTH CAROLINA ) SS: COUNTY OF MECKLENBURG )

The undersigned, Jacob Stewart, Director Health & Wellness, being duly sworn, deposes and says that he has personal knowledge of the matters set forth in the foregoing supplemental data requests, and that the answers contained therein are true and correct to the best of his knowledge, information and belief.

Jacob Stewart Affiant

Subscribed and sworn to before me by Jacob Stewart on this  $18^{-18}$  day of  $4^{-18}$ 

2023.

nea NOT

My Commission Expires:

FELICIA SUEANN RUTTY NOTARY PUBLIC MECKLENBURG COUNTY, NC My Commission Expires 9-17-2023



#### 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 supplemental 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 <u>19</u> day of <u>Apri2</u>,

2023.

MECK-M. Adars Ā OTARY PUBLIC 10/2/28 My Commission Expires: RG C mannet

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# **DATA REQUEST**

# **WITNESS**

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#### FIRST SUPPLEMENTAL AG-DR-01-029

#### **REQUEST:**

Refer to the Carpenter Testimony at 9 - 10. Mr. Carpenter states that the union labor cost increases were assumed to be between 2% - 3.5%, depending on the agreements, while non-union labor cost increases were assumed to be 3.5% (including both merit increases of 3% and an allowance for salary increases for promotions of 0.5%).

a. Provide an update on the union labor agreements as well as the union labor cost increases. Consider this an ongoing request.

b. Explain whether Duke Kentucky awards the same cost increase to nonunion employees that the union employees receive. If not, explain how Duke Kentucky negotiates with the union versus non-union employees on wage/benefit increases.

c. Explain what employees are eligible to join a union at Duke Kentucky.

#### **RESPONSE:**

a. Negotiations are still in progress with UWUA (collective bargaining agreement expired March 31, 2023) and the Company expects to have a ratified contract by mid-to late May. The formal contract will not be available for months after the new contract terms are ratified; however, we can provide a summary of changes, which will include the general wage increase effective for 2023, once the contract is ratified.

- b. N/A
- c. N/A

#### **PERSON RESPONSIBLE:** Jacob J. Stewart

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## FIRST SUPPLEMENTAL AG-DR-02-001

## **REQUEST:**

Refer to Duke Kentucky's response to the Attorney General's First Request for Information ("Attorney General's First Request"), Item 3(b). Provide the annual general wage increase for union employees when the new collective bargaining agreement for 2023 is finalized. Consider this an ongoing request throughout the pendency of the case.

# **RESPONSE:**

See the response to AG-DR-01-029 First Supplemental.

PERSON RESPONSIBLE: Jacob J. Stewart

## FIRST SUPPLEMENTAL AG-DR-02-016

## **REQUEST:**

Refer to Duke Kentucky's response to the Attorney General's First Request, Item 23(c). Provide the net plant balance not yet depreciated on the East Bend generating unit as of January 2023. If this information is still not available, explain in detail why the information is not available and when it will be available. Consider this an ongoing request throughout the pendency of this case.

# **RESPONSE:**

Net plant balance, not yet depreciated, for East Bend generating plant was \$479,886,352 and \$478,608,768 as of February 2023 and March 2023, respectively. These amounts represented Net Book Value (Life only) of Production assets including land, excluding AROs.

PERSON RESPONSIBLE: Huyen C. Dang