

VERIFICATION

STATE OF OHIO)
)
COUNTY OF HAMILTON) **SS:**

The undersigned, Bruce Sailers, Director Jurisdictional Rate Administration, 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.



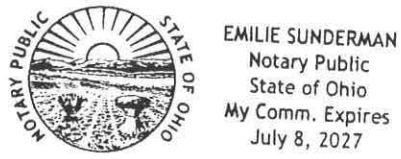
Bruce Sailers Affiant

Subscribed and sworn to before me by Bruce Sailers on this 1st day of March, 2023.



NOTARY PUBLIC

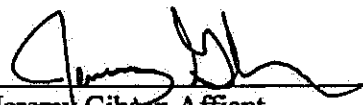
My Commission Expires: July 8, 2027



VERIFICATION

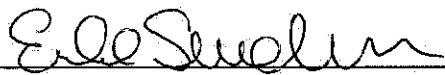
STATE OF OHIO)
) SS:
COUNTY OF HAMILTON)

The undersigned, Jeremy Gibson, Supervisor Joint Use, 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.



Jeremy Gibson Affiant

Subscribed and sworn to before me by Jeremy Gibson on this 15th day of March, 2023.



NOTARY PUBLIC

My Commission Expires: July 8, 2027



EMILIE SUNDERMAN
Notary Public
State of Ohio
My Comm. Expires
July 8, 2027

VERIFICATION

STATE OF OHIO)
) **SS:**
COUNTY OF HAMILTON)

The undersigned, Lisa Steinkuhl, Director Rates & Regulatory Planning, 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.



Lisa Steinkuhl Affiant

Subscribed and sworn to before me by Lisa Steinkuhl on this 28th day of February, 2023.



NOTARY PUBLIC

My Commission Expires: July 8, 2027

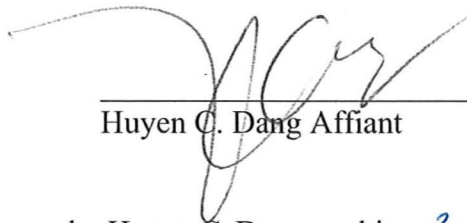


EMILIE SUNDERMAN
Notary Public
State of Ohio
My Comm. Expires
July 8, 2027

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 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 2 day of March,
2023.




NOTARY PUBLIC
My Commission Expires: 10/2/26

KyPSC Case No. 2022-00372

TABLE OF CONTENTS

<u>DATA REQUEST</u>	<u>WITNESS</u>	<u>TAB NO.</u>
KBCA-DR-02-001	Bruce L. Sailors	1
KBCA-DR-02-002	Jeremy B. Gibson	2
KBCA-DR-02-003	Lisa D. Steinkuhl	3
KBCA-DR-02-004	Huyen C. Dang.....	4
KBCA-DR-02-005	Huyen C. Dang.....	5

Duke Energy Kentucky
Case No. 2022-00372
KBCA's Second Set Data Requests
Date Received: February 17, 2023

KBCA-DR-02-001

REQUEST:

Please refer to BLS_2, to the tab labeled "LFCR per Order." The header appearing on Line 5, column F above the rate of return calculation is labeled "Approved Capital Structure Rate of Return." Please confirm that the 7.526% rate of return identified and derived in this attachment represents the proposed rate of return in Case No. 2022-00372, and not the approved rate of return. Please also confirm Duke Kentucky's agreement that the rate of return input used to calculate the pole attachment rate charged to attachers will be calculated using the final approved rate of return in this case.

RESPONSE:

The Company confirms that the value referenced is the proposed weighted average cost of capital (WACC). The Company also confirms that the WACC approved in the final order in this case by the Commission will be used to calculate the LFCR value for use in pole attachment rates charged to attachers.

PERSON RESPONSIBLE: Bruce L. Sailors

Duke Energy Kentucky
Case No. 2022-00372
KBCA's Second Set Data Requests
Date Received: February 17, 2023

KBCA-DR-02-002

REQUEST:

Please refer to KBCA-DR-01-004_Attachment.xlsx. For the various pole categories identified in this attachment, please identify the categories on which third party pole attachments are currently attached, and provide a breakdown of the number of third party attachments on each for the year ending 2021.

RESPONSE:

See the table below for the third-party pole attachments currently attached to poles for the year ending 2021.

2021	Description	Quantity
	Pole: steel, all sizes	0
	Pole: Wood, 30' or less	2,192
	Pole: Wood, 35'	8,606
	Pole: Wood, 40'	28,669
	Pole: Wood, 45'	23,245
	Pole: Wood, 50'	7,164
	Pole: Wood, 55'	2,574
	Pole: Wood, 60'	993
	Pole: Wood, 65'	282
	Pole: Wood, 70'	142
	Pole: Wood, 75'	35
	Pole: Wood, 80'	16
	Pole: Wood, 85'	3
	Pole: Wood, 90'	0
	Pole: Wood, 95'	0
	Unknown	<u>886</u>
		<u>74,807</u>

PERSON RESPONSIBLE: Jeremy B. Gibson

**Duke Energy Kentucky
Case No. 2022-00372
KBCA's Second Set Data Requests
Date Received: February 17, 2023**

KBCA-DR-02-003

REQUEST:

Please refer to KBCA DR-1-008, (k). In reference to Maintenance Expenses related to overhead distribution plant (FERC Account 593, or equivalent), please indicate whether any of the amounts booked to Account 593 for the year ending 2021 included any storm related expenses for which Duke Kentucky is seeking regulatory asset treatment, and if so, please identify any amounts subject to expense deferral.

RESPONSE:

The Company is not seeking regulatory asset treatment for any storm related expenses booked to account 593 for the year ending 2021.

PERSON RESPONSIBLE: Lisa D. Steinkuhl

**Duke Energy Kentucky
Case No. 2022-00372
KBCA's Second Set Data Requests
Date Received: February 17, 2023**

KBCA-DR-02-004

REQUEST:

Please refer to KBCA-DR-01-009_Attachment.xlsx. In reference to Tab "M and O," and "N" of the attachment, please provide a detailed explanation of the dollar amounts appearing in the next to last three columns H - J of these Tabs labeled as "rwip_allocation," "end_reserve," and "cor_end_reserve." As part of this explanation, please show how the identified end of year balances have been derived from the beginning year balances based on the application of the applicable life depreciation rate, cost of removal rate, and any retirement or unitization related adjustments.

RESPONSE:

Please see KBCA-DR-02-004 Attachment.

PERSON RESPONSIBLE: Huyen C. Dang

Duke Energy Kentucky
 KBCA-DR-02-004

1. Explanation of the Accumulated Depreciation components reported within KBCA-DR-01-009 Attachment (c,m,n,o,p)

RWIP Allocation: represents cost of removal (net of salvage) incurred but not yet utilized (classified within the FERC Utility Accounts)

End_Reserve: represents accumulated depreciation for the life component (accrued based on the life (net of salvage) rates)

COR_end_reserve: represents accumulated depreciation for the cost of removal component (accrued based on the COR rates, net of unitized COR)

2. Accumulated Depreciation (all components) rollforwarded from December 2020 through December 2021

depr_group	Components	Accumulated Depreciation				Cost Of Removal		Accumulated Depreciation	
		Balance at Dec 2020	Life Depreciation	COR Depreciation	Retirements	Activity	Salvage Credits	Balance at Dec 2021	
3692 - ULH OH Services	RWIP Allocation	(995,106)			-	232,692	-	(762,414)	
3692 - ULH OH Services	End Reserve	7,795,636	204,596		(8,289)	-	(222)	7,991,720	
3692 - ULH OH Services	COR End Reserve	3,349,154	-	40,514	-	(710,087)	-	2,679,581	
3691 - ULH UG Services	RWIP Allocation	(63,485)			-	10,573	-	(52,912)	
3691 - ULH UG Services	End Reserve	497,339	57,293		-	-	-	554,632	
3691 - ULH UG Services	COR End Reserve	185,721		14,132	-	-	-	199,854	
	Total:	10,769,258	261,889	54,646	(8,289)	(466,823)	(222)	10,610,460	
		<i>Agrees to KBCA-DR-01-009 Attachment (Tab M and O)</i>						<i>Agrees to KBCA-DR-01-009 Attachment (Tab M and O)</i>	
3640 - ULH Poles, Towers & Fixtures	RWIP Allocation	(3,304,907)				787,996		(2,516,910)	
3640 - ULH Poles, Towers & Fixtures	End Reserve	25,890,551	1,049,303		(557,177)	-	(123)	26,382,555	
3640 - ULH Poles, Towers & Fixtures	COR End Reserve	6,022,629		495,094	-	(2,463,131)	-	4,054,592	
	Total:	28,608,273	1,049,303	495,094	(557,177)	(1,675,134)	(123)	27,920,237	
		<i>Agrees to KBCA-DR-01-009 Attachment (Tab N)</i>						<i>Agrees to KBCA-DR-01-009 Attachment (Tab N)</i>	

**Duke Energy Kentucky
Case No. 2022-00372
KBCA's Second Set Data Requests
Date Received: February 17, 2023**

KBCA-DR-02-005

REQUEST:

Please refer to KBCA-DR-01-011_Attachment.xlsx. Confirm that the quantity for “Non-Unitized/estimated retirements” identified in this attachment as of Dec-20, Dec-21, and Dec-22, and noted in the spreadsheet as not finalized, have been included in the pole counts for 35, 40, and 45 feet poles used to calculate the pole attachment rate and reconciled to the numbers of such poles identified in KBCA-DR-01-004_Attachment.xlsx as of year-end 2021. If you cannot so confirm, please identify the number of the “Non-unitized/estimated retirement” units associated with 35, 40, and 45 feet poles.

RESPONSE:

Please see KBCA-DR-02-005 Attachment.

PERSON RESPONSIBLE: Huyen C. Dang

Duke Energy Kentucky
KBCA-DR-02-005

Quantity of poles noted as "Non-Unitized/Estimated Retirements" included in KBCA-DR-01-011 as of Dec 2020 was 3,375. Of the 3,375 quantity, we've finalized a total of 911 (quantity) in 2021. This total (911 quantity) has been included within the pole counts for 35, 40 and 45 feet poles (see below) reported in KBCA-DR-01-004 for 2021.

	<u>2020*</u>	<u>Quantity</u>	<u>2021*</u>
Pole: Wood, 35'	6,509	75	6,584
Pole: Wood, 40'	16,456	251	16,707
Pole: Wood, 45'	10,351	585	10,936
		<u>911</u>	

* per response to KBCA-DR-01-004 Attachment