

**COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION**

IN THE MATTER OF: :

ELECTRONIC APPLICATION OF DUKE ENERGY :

KENTUCKY, INC. FOR (1) AN ADJUSTMENT OF :

ELECTRIC RATES; (2) APPROVAL OF NEW TARIFFS; : **Case No. 2022-00372**

(3) APPROVAL OF ACCOUNTING PRACTICES TO :

ESTABLISH REGULATORY ASSETS AND LIABILITIES; :

AND (4) ALL OTHER REQUIRED APPROVALS AND :

RELIEF :

**FIRST SET OF DATA REQUESTS OF THE KROGER CO.
TO DUKE ENERGY KENTUCKY, INC.**

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COUNSEL FOR THE KROGER CO.

Dated: January 11, 2022

DEFINITIONS

1. “Document” means the original and all copies (regardless of origin and whether or not including additional writing thereon or attached thereto) of memoranda, reports, books, manuals, instructions, directives, records, forms, notes, letters, notices, confirmations, telegrams, pamphlets, notations of any sort concerning conversations, telephone calls, meetings or other communications, bulletins, transcripts, diaries, analyses, summaries, correspondence investigations, questionnaires, surveys, worksheets, and all drafts, preliminary versions, alterations, modifications, revisions, changes, amendments and written comments concerning the foregoing, in whatever form, stored or contained in or on whatever medium, including computerized memory or magnetic media.
2. “Study” means any written, recorded, transcribed, taped, filmed, or graphic matter, however produced or reproduced, either formally or informally, a particular issue or situation, in whatever detail, whether or not the consideration of the issue or situation is in a preliminary stage, and whether or not the consideration was discontinued prior to completion.
3. “Person” means any natural person, corporation, professional corporation, partnership, association, joint venture, proprietorship, firm, or the other business enterprise or legal entity.
4. A request to identify a natural person means to state his or her full name and residence address, his or her present last known position and business affiliation at the time in question.
5. A request to identify a document means to state the date or dates, author or originator, subject matter, all addressees and recipients, type of document (e.g., letter, memorandum, telegram, chart, etc.), number of code number thereof or other means of identifying it, and its present location and custodian. If any such document was but is no longer in the Company’s possession or subject to its control, state what disposition was made of it.
6. A request to identify a person other than a natural person means to state its full name, the address of its principal office, and the type of entity.
7. “And” and “or” should be considered to be both conjunctive and disjunctive, unless specifically stated otherwise.
8. “Each” and “any” should be considered to be both singular and plural, unless specifically stated otherwise.
9. Words in the past tense should be considered to include the present, and words in the present tense include the past, unless specifically stated otherwise.
10. “You” or “your” means the person whose filed testimony is the subject of these interrogatories and, to the extent relevant and necessary to provide full and complete answers to any request, “you” or “your” may be deemed to include any person with information relevant to any interrogatory who is or was employed by or otherwise associated with the witness or who assisted, in any way, in the preparation of the witness’ testimony.
11. “Company” or “DEK” means Duke Energy Kentucky, Inc. and/or any of their officers, directors, employees or agents who may have knowledge of the particular matter addressed, and affiliates.

INSTRUCTIONS

1. If any matter is evidenced by, referenced to, reflected by, represented by, or recorded in any document, please identify and produce for discovery and inspection each such document.
2. These interrogatories are continuing in nature, and information which the responding party later becomes aware of, or has access to, and which is responsive to any request is to be made available to The Kroger Co. Any studies, documents, or other subject matter not yet completed that will be relied upon during the course of this case should be so identified and provided as soon as they are completed. The Respondent is obliged to change, supplement and correct all answers to interrogatories to conform to available information, including such information as it first becomes available to the Respondent after the answers hereto are served.
3. Unless otherwise expressly provided, each interrogatory should be construed independently and not with reference to any other interrogatory herein for purpose of limitation.
4. The answers provided should first restate the question asked and also identify the person(s) supplying the information.
5. Please answer each designated part of each information request separately. If you do not have complete information with respect to any interrogatory, so state and give as much information as you do have with respect to the matter inquired about and identify each person whom you believe may have additional information with respect thereto.
6. In the case of multiple witnesses, each interrogatory should be considered to apply to each witness who will testify to the information requested. Where copies of testimony, transcripts or depositions are requested, each witness should respond individually to the information request.
7. The interrogatories are to be answered under oath by the witness(es) responsible for the answer.
8. Responses to requests for revenue, expense and rate base data should provide data on the basis of Total company as well as Intrastate data, unless otherwise requested.

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(3) APPROVAL OF ACCOUNTING PRACTICES TO :
ESTABLISH REGULATORY ASSETS AND :
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APPROVALS AND RELIEF :

**FIRST SET OF DATA REQUESTS OF THE KROGER CO.
TO DUKE ENERGY KENTUCKY, INC.**

- Q.1-1 Please provide an electronic version of the Company’s confidential filing documents, workpapers, and responses to discovery in this case. To the extent the Company files corrections, revisions, amendments, supplemental information and/or errata to these documents, please provide all updated materials.
- Q.1-2 **Refer to the direct testimony of William Luke, p. 4, lines 3-9.** *“Although East Bend is approaching the end of its service life and the Company plans to replace the asset with other resources, it is important to keep the remaining unit in efficient working order to support the energy needs of our customers. Therefore, costs for this asset will continue to be incurred and investments made as appropriate and prudent to ensure that the same reliable cost-effective electricity that customers have counted on for decades remains available while the replacement of those units is developed and implemented.”*
- a. Please provide the most recent 5 years of historical maintenance expense for East Bend. Please provide all supporting workpapers in Microsoft Excel format.
 - b. Please provide a narrative explaining the maintenance that occurred for the 5 years of historical data provided in (a).
 - c. Please provide a forecast of maintenance expense for East Bend through the expected retirement in 2032. If a forecast is not available through 2032, please provide all available forecasted information. Please provide all supporting workpapers in Microsoft Excel format.
 - d. Please provide a narrative explaining the maintenance that is expected to occur for the forecasted data provided in (c).
- Q.1-3 **Refer to the direct testimony of William Luke, p. 5-6.**
- a. Please provide the most recent 5 years of historical capital investments in East Bend. Please provide all supporting workpapers in Microsoft Excel format.

- b. Please provide a narrative explaining the capital investments that occurred for the 5 years of historical data provided in (a).
- c. Please provide a forecast of capital investments for East Bend through the expected retirement in 2032. If a forecast is not available through 2032, please provide all available forecasted information. Please provide all supporting workpapers in Microsoft Excel format.
- d. Please provide a narrative explaining the capital investment that is expected to occur for the forecasted data provided in (c).

Q.1-4 Refer to the direct testimony of William Luke, p. 9, lines 4-10. *“Duke Energy Kentucky follows similar periodic maintenance cycles for the Woodsdale units to those of East Bend that I mentioned above. The dual fuel capabilities installed in 2019 provide another option for safe, reliable power from the Woodsdale facility. Since the time of the Company’s last rate case, the Company has also made necessary investments to ensure the reliability of the plant some of which include generator field rewinds, a turbine section replacement, and a generator rotor rewind.”*

- a. Please provide the most recent 5 years of historical maintenance expense for Woodsdale. Please provide all supporting workpapers in Microsoft Excel format.
- b. Please provide a narrative explaining the maintenance that occurred for the 5 years of historical data provided in (a).
- c. Please provide a forecast of maintenance expense for Woodsdale through the expected retirement in 2032. If a forecast is not available through 2032, please provide all available forecasted information. Please provide all supporting workpapers in Microsoft Excel format.
- d. Please provide a narrative explaining the maintenance that is expected to occur for the forecasted data provided in (c).
- e. Please provide the most recent 5 years of historical capital investments in Woodsdale. Please provide all supporting workpapers in Microsoft Excel format.
- f. Please provide a narrative explaining the capital investments that occurred for the 5 years of historical data provided in (e).
- g. Please provide a forecast of capital investments for Woodsdale through the expected retirement in 2032. If a forecast is not available through 2032, please provide all available forecasted information. Please provide all supporting workpapers in Microsoft Excel format.
- h. Please provide a narrative explaining the capital investment that is expected to occur for the forecasted data provided in (g).

Q.1-5 Refer to the direct testimony of Sarah E. Lawler, pp. 5-6. *“East Bend is now currently projected to retire in 2035, six years earlier than its originally planned retirement date of 2041. In order to align the depreciation rates with this new estimated retirement date, depreciation expense has to increase. This is driving approximately \$11 million of the total \$35 million increase in depreciation expense. Partially mitigating this increase is the fact that the estimated retirement date of Woodsdale is now projected to be 2040, eight years later than its originally planned retirement date. Included in the \$35 million increase in depreciation expense is an approximately \$7 million decrease associated with this extension of useful life.”*

- a. Please provide all workpapers in Excel format documenting the change in depreciation expense that would result from the Company’s filed case.

Respectfully submitted,

/s/ Kurt J. Boehm

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Jody Kyler Cohn, Esq.

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