STATE OF OHIO	)	
	)	SS:
COUNTY OF HAMILTON	)	

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 Z Sailers Bruce Sailers Affiant

Subscribed and sworn to before me by Bruce Sailers on this 302 day of April \_\_\_\_\_, 2024.

ull NOTARY PUBLIC

My Commission Expires: July 8,2027



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

STATE OF NORTH CAROLINA ) COUNTY OF MECKLENBURG )

SS:

The undersigned, Jacob Colley, Director Customer Regulatory Planning, Support, and Compliance, 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.

Jacob Colley Affiant

Subscribed and sworn to before me by Jacob Colley on this \_\_\_\_\_day of \_Ppi 2024.



My Commission Expires: February 4, 2026

STATE OF NORTH CAROLINA SS: ) COUNTY OF MECKLENBURG Lincoln

The undersigned, Matt Kalemba, Vice President Integrated Resource Planning, 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.

Matt Kalemba Affiant

Subscribed and sworn to before me by Matt Kalemba on this <u>4</u> day of <u>April</u>, 2024.



eila Lemoine

My Commission Expires: July 21,2024

STATE OF OHIO	)	
	)	SS:
COUNTY OF HAMILTON	)	

The undersigned, Dominic Melillo, Director Asset Management, 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.

Dominic Melillo

Dominic Melillo Affiant

Subscribed and sworn to before me by Dominic Melillo on this  $\underline{940}$  day of  $\underline{100}$ , 2024.

NOTARY PUBLIC

My Commission Expires: July 8, 2027



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

STATE OF INDIANA	)	
	)	SS:
COUNTY OF HENDRICKS	)	

The undersigned, Timothy J. Hohenstatt, Director Transmission Planning, 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.

Timothy J. Hohenstatt, Affiant

Subscribed and sworn to before me by Timothy J. Hohenstatt on this  $\frac{1}{2}$  day of L2024.

HOTARY PUBLIC

My Commission Expires: 10/26/29



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

The undersigned, John D. Swez, Managing Director, Trading and Dispatch, 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.

John D. Swez, Affiant

Subscribed and sworn to before me by John D. Swez on this  $\underline{\mathcal{S}}^{-}$  day of  $\underline{\mathcal{OV}_{1}}$ , 2024.

ÓTARY ГIС

My Commission Expires:



#### **COMMONWEALTH OF KENTUCKY**

### **BEFORE THE PUBLIC SERVICE COMMISSION**

In the Matter of:

APPLICATION OF DUKE ENERGY KENTUCKY, INC.)FOR AN ADJUSTMENT TO RIDER NM RATES AND)CASE NO.FOR TARIFF APPROVAL)2023-00413

# PETITION FOR CONFIDENTIAL TREATMENT OF DUKE ENERGY KENTUCKY, INC. FOR CERTAIN RESPONSES TO THE STAFF OF THE PUBLIC SERVICE COMMISSION'S MARCH 28, 2024 FOURTH REQUEST FOR INFORMATION

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 response to Staff's Fourth Request for Information, as requested by Commission Staff (Staff) in this case on March 28, 2024. The information that Staff seeks through discovery and for which Duke Energy Kentucky now seeks confidential treatment is contained in the attachment to the Company's response to Data Request No. 8 (STAFF-DR-04-008 Confidential Attachment or Confidential Information). The public disclosure of the information described would reveal a preliminary draft and/or preliminary memorandum, which are protected by KRS 61.878 (1)(i) and (j).

In support of this Petition, Duke Energy Kentucky states:

1. The Kentucky Open Records Act exempts from disclosure certain information. KRS 61.878. In particular, KRS 61.878(1)(i) excludes from the Open Records Act (emphasis added):

**Preliminary drafts**, notes, correspondence with private individuals, other than correspondence which is intended to give notice of final action of a public agency.

2. Additionally, KRS 61.878(1)(j) excludes from the Open Records Act (emphasis added):

# **Preliminary recommendations, and preliminary memoranda** in which opinions are expressed or policies formulated or recommended.

Public disclosure of the Confidential Information would disclose preliminary, draft projections, which will be subject to further validation and change, and may differ from what is ultimately submitted in the Company's next IRP proceeding.

3. The Confidential Information in the response to Data Request No. 8, *i.e.*, STAFF-DR-04-008 Confidential Attachment, contains an updated version of Table H3 from the Company's 2021 IRP, pursuant to Staff's request. Updates include an increase in the Company's Reserve Margin reflecting PJM's latest requirements, and also an update to the peak load forecast to match Spring 2024 assumptions. The Company requests that this Confidential Information be afforded confidential treatment pursuant to KRS 61.878(1)(i) and KRS 61.878(1)(j), and additionally requests that STAFF-DR-04-008 Confidential Attachment be treated as confidential in its entirety pursuant to 807 KAR 5:001, Section 13(2)(a)(3)(b).

4. STAFF-DR-04-008 Confidential Attachment contains a preliminary draft interim forecast, which will be subject to further validation and possible change prior to the filing of the Company's next IRP. It is not, at this time, the final Table H.3 that the Company plans to submit in its next IRP. This information is not on file with any public agency, and is not available from any commercial or other source. The aforementioned information is distributed within Duke Energy Kentucky only to those employees who must have access for business reasons. It could potentially be prejudicial to disclose such preliminary draft figures, especially in light of the Company's forthcoming formal IRP submission in 2024.

5. Additionally, this information is integral to Duke Energy Kentucky's effective execution of business decisions. And such information is generally regarded as confidential. 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).

6. 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 sensitive so as to likely impair the interests of the Company if publicly disclosed.

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

8. 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 Confidential Information described herein.

3

Respectfully submitted,

/s/ Larisa M. Vaysman

Rocco O. D'Ascenzo (92796) Deputy General Counsel Larisa M. Vaysman (98944) Associate General Counsel Duke Energy Business Services LLC 139 East Fourth Street, 1303-Main Cincinnati, Ohio 45202 Phone: (513) 287-4320 Fax: (513) 370-5720 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 in paper medium; that the electronic filing was transmitted to the Commission on April 10, 2024; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and that submitting the original filing to the Commission in paper medium is no longer required as it has been granted a permanent deviation.<sup>1</sup>

/s/ Larisa M. Vaysman Counsel for Duke Energy Kentucky, Inc.

<sup>&</sup>lt;sup>1</sup>In the Matter of Electronic Emergency Docket Related to the Novel Coronavirus COVID-19, Order, Case No. 2020-00085 (Ky. PSC July 22, 2021).

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## **REQUEST:**

Refer to the Direct Testimony of Bruce Sailers, page 14, lines 1–10.

- a. Explain which types, in terms of MW impact, of inverters are currently being installed with customers in Duke Kentucky's territory.
- b. Explain whether Duke Kentucky takes into account energy output from behind the meter solar generation in its day ahead forecast.
- c. If a customer were to install a different inverter with a larger capacity, explain whether they would remain on NM-1 or immediately be enrolled in NM-2.

## **RESPONSE:**

a. The Company interprets "MW impact" to mean the size of inverters currently being installed. The values used in this proceeding referencing the aggregated kW-AC capability of net metering systems represent the capacity rating of the inverters. The aggregated values are provided in Table 1 of Mr. Sailers direct testimony on page 8. The values are provided here for convenience: 776 participants and 5.9 MW-AC. Removing non-residential customers, the residential values are 760 participants and 5.181 MW-AC. An average residential inverter size for residential participants is therefore 5.181 \* 1000 / 760 = 6.8 kW-AC. As a reference point for current inverter sizes being installed, Table 1 referenced above also contains information on queued or pending participants. Removing the non-residential customers, these values are

96 pending participants and 0.645 MW-AC for an average inverter size of 0.645 \*1000 / 96 = 6.7 kW-AC. This information can be further described through categories. Thirty-six (36) pending customer-generators have a kW-AC rating of 5.0 or less. Fifty-one (51) pending customer-generators have a kW-AC rating greater than 5.0 and less than or equal to 10.0. Nine (9) pending customer-generators have a kW-AC rating greater than 10.0. Also see the Company's response to KSES-DR-01-001(f) which may provide additional insight.

b. For the purposes of this response, behind the meter solar generation is defined as that produced by net metering customers and consumed on the premises or produced by Company resources such as Walton 1, Walton 2, Crittenden, and Aero Solar, called Non-Retail Behind the Meter Generation (NRBTMG).

There is no direct offer for behind the meter solar generation (or other behind the meter generation) as a supply resource to PJM such as is done for East Bend and Woodsdale 1-6. However, any amount of behind the customer meter generation is embedded in the historical data used by short-term forecasting models and therefore ultimately impacts the forecasted load amount and PJM demand bid.

c. The expansion of the system through an increased inverter capacity requires the customer to provide notification to the Company which triggers the process to complete a new interconnection study. Upon approval of the new interconnection study, the customer would be enrolled in the NM II program if available.

# PERSON RESPONSIBLE: (a) Bruce Sailers (b) John Swez, (c) Bruce Sailers

# **REQUEST:**

Provide the name and title of each employee involved in drafting and composing the material terms of the proposed NM-2 Tariff.

# **RESPONSE:**

Assuming that "proposed NM-2 Tariff" specifically refers to the proposed tariff sheet titled "Rider NM II," proposed Sheet No. 84, the following individuals contributed to the drafting and composition as further described below:

- Mr. Bruce Sailers, Director, Jurisdictional Rate Administration, is the primary drafter and composer of the tariff sheet.
- Insofar as others contributed materially to Mr. Sailers' calculation of the credit values on page 3 of the proposed sheet, these were:
  - o Mr. Nicholas Melillo, Director, Asset Management (distribution planning)
  - Mr. Timothy Hohenstatt, Director, Transmission Planning (transmission planning)
  - o Mr. Matt Kalemba, VP, Integrated Resource Planning (avoided cost data)
- Ms. Nancy Connelly, Lead Engineer, and Mr. Charlie Ploeger, Manager, Meter Engineering, also participated.

# PERSON RESPONSIBLE: Bruce L. Sailers

# **REQUEST:**

Provide a breakdown of the approval process for an application for service under NM-1 Tariff. Include each phase and the expected time of the application process.

## **RESPONSE:**

Generally speaking, the typical phases of the process are as follows, assuming the customer complies with application requirements and is generally responsive to Company requests: (1) Application Submission: The company receives an application either digitally via email or via traditional mail.

(2) Initial Review: Upon receiving the application, the Company will conduct an initial review of the submitted documents within 10 business days. The customer will be notified of the receipt of the application and the next steps in the process will be communicated.

(3) Engineering/Technical Review and Approval: The timeframe for this phase varies and is based on factors such as applicant participation and complexity of the request. If all required documentation is provided, the application will be sent for engineering/technical review for approval of the physical installation. If additional documentation is needed from the customer, a prompt request will be made.

(4) Final Approval and Notification: Once all documentation is provided and approved, a final approval notice will be sent to the customer via email. The customer will receive instructions on how to proceed with the construction/installation process.

(5) Once customer/installer confirms the installation has been completed the Company will send a final confirmation notice and will set up the Net Metering alert in the Customer Service Billing system and create the order for the meter to be programmed for bidirectional measurement.

The expected time for completion of the entire process can vary greatly and depends in part on the customer's compliance, promptness, and responsiveness.

**PERSON RESPONSIBLE:** Jacob Colley

# **REQUEST:**

For each net metering interconnection application received during calendar year 2023,

provide the number of days between receipt of the application and interconnection.

**RESPONSE:** The requested data is provided below for applications which were received

during calendar year 2023 and resulted in interconnection.

Project ID	Interconnection	Operational	Operational	Days between Receipt
	Request Rec'd	Date	Status	and Connection
Project 30821	1/5/2023	3/8/2023	Connected	62
Project 30822	1/17/2023	2/3/2023	Connected	17
Project 30824	1/20/2023	4/5/2023	Connected	75
Project 30828	1/23/2023	3/3/2023	Connected	39
Project 30827	1/24/2023	3/14/2023	Connected	49
Project 30831	1/25/2023	3/20/2023	Connected	54
Project 30823	1/26/2023	3/3/2023	Connected	36
Project 30834	1/27/2023	3/31/2023	Connected	63
Project 30838	2/3/2023	3/3/2023	Connected	28
Project 30839	2/8/2023	2/27/2023	Connected	19
Project 30846	2/8/2023	3/24/2023	Connected	44
Project 30854	3/3/2023	3/28/2023	Connected	25
Project 30855	3/3/2023	7/21/2023	Connected	140
Project 30857	3/6/2023	4/28/2023	Connected	53
Project 30859	3/9/2023	5/3/2023	Connected	55
Project 30863	3/15/2023	5/9/2023	Connected	55
Project 30871	3/17/2023	3/28/2023	Connected	11
Project 30867	3/17/2023	4/21/2023	Connected	35
Project 30868	3/17/2023	4/21/2023	Connected	35
Project 30869	3/21/2023	5/12/2023	Connected	52
Project 30864	3/22/2023	6/15/2023	Connected	85
Project 30874	3/27/2023	6/6/2023	Connected	71
Project 30873	3/31/2023	5/2/2023	Connected	32
Project 30848	4/5/2023	4/11/2023	Connected	6
Project 30879	4/6/2023	6/26/2023	Connected	81
Project 30881	4/11/2023	4/24/2023	Connected	13

Project 30878	4/13/2023	6/6/2023	Connected	54
Project 30876	4/17/2023	6/27/2023	Connected	71
Project 30887	4/27/2023	6/15/2023	Connected	49
Project 30884	4/27/2023	6/22/2023	Connected	56
Project 30885	4/27/2023	8/8/2023	Connected	103
Project 30883	4/28/2023	9/21/2023	Connected	146
Project 30888	5/4/2023	6/21/2023	Connected	48
Project 30892	5/5/2023	9/22/2023	Connected	140
Project 30893	5/12/2023	8/24/2023	Connected	104
Project 30896	5/25/2023	10/16/2023	Connected	144
Project 30895	5/31/2023	6/9/2023	Connected	9
Project 30899	6/1/2023	8/23/2023	Connected	83
Project 30900	6/15/2023	8/28/2023	Connected	74
Project 30903	6/23/2023	12/14/2023	Connected	174
Project 30912	7/10/2023	8/14/2023	Connected	35
Project 30917	7/25/2023	9/28/2023	Connected	65
Project 30918	7/25/2023	7/31/2023	Connected	6
Project 30915	7/25/2023	9/7/2023	Connected	44
Project 30940	8/18/2023	9/13/2023	Connected	26
Project 30939	8/23/2023	2/20/2024	Connected	181
Project 30941	8/23/2023	9/28/2023	Connected	36
Project 30942	8/23/2023	9/22/2023	Connected	30
Project 30944	8/29/2023	9/8/2023	Connected	10
Project 30950	9/9/2023	9/28/2023	Connected	19
Project 30951	9/12/2023	10/19/2023	Connected	37
Project 30916	9/21/2023	10/10/2023	Connected	19
Project 30955	10/4/2023	2/16/2024	Connected	135
Project 30958	10/9/2023	2/14/2024	Connected	128
Project 30960	10/10/2023	12/11/2023	Connected	62
Project 30961	10/10/2023	10/26/2023	Connected	16
Project 30963	10/10/2023	12/8/2023	Connected	59
Project 30964	10/12/2023	2/29/2024	Connected	140
Project 30965	10/16/2023	11/1/2023	Connected	16
Project 30886	10/17/2023	10/17/2023	Connected	0
Project 30969	10/19/2023	2/6/2024	Connected	110
Project 30967	10/23/2023	1/31/2024	Connected	100
Project 30970	10/27/2023	1/23/2024	Connected	88
Project 30971	10/31/2023	1/4/2024	Connected	65
Project 30872	11/20/2023	11/20/2023	Connected	0
Project 30979	12/11/2023	1/24/2024	Connected	44
DEDSON DESD	ONSIDI E.	Jacob Coller		

PERSON RESPONSIBLE:

Jacob Colley

# **REQUEST:**

For each pending application for service under NM-1, provide the status of each application. Include the initial application acceptance date, the stage in the process, and the length of time application has been pending in that stage.

# **RESPONSE:**

The table below provides the remaining applications that are pending status. An application's length of time within each stage/status is not tracked as each status can be used more than once during project review process.

Project ID	Interconnection Request Rec'd Date	Application Status
Project 26671	9/2/2019	Under Construction / In Progress - pending install confirmation
Project 29001	9/15/2021	Under Construction / In Progress - pending install confirmation
Project 30386	6/13/2022	Under Construction / In Progress - pending install confirmation
Project 30497	7/8/2022	Under Construction / In Progress - pending install confirmation
Project 30890	4/27/2023	Under Construction / In Progress - pending install confirmation
Project 30911	7/7/2023	Pending Customer Updates/Response
Project 30914	7/17/2023	Pending Customer Updates/Response
Project 30934	7/25/2023	Under Construction / In Progress - pending install confirmation
Project 30936	8/4/2023	Under Construction / In Progress - pending install confirmation
Project 30937	8/7/2023	Under Construction / In Progress - pending install confirmation
Project 30956	9/27/2023	Under Construction / In Progress - pending install confirmation
Project 30954	10/2/2023	Under Construction / In Progress - pending install confirmation
Project 30968	10/23/2023	Under Construction / In Progress - pending install confirmation
Project 30978	12/6/2023	Under Construction / In Progress - pending install confirmation
Project 30981	12/15/2023	Pending Customer Updates/Response
Project 30982	12/22/2023	Pending Customer Updates/Response
Project 940107	1/9/2024	Under Construction / In Progress - pending install confirmation
Project 944077	1/16/2024	Under Construction / In Progress - pending install confirmation
Project 941751	1/17/2024	Under Construction / In Progress - pending install confirmation

Project 944497	2/6/2024	Under Construction / In Progress - pending install confirmation
Project 944283	2/6/2024	Pending Customer Response
Project 945663	2/9/2024	Under Construction / In Progress - pending install confirmation
Project 945947	2/14/2024	Under Construction / In Progress - pending install confirmation
Project 945961	2/15/2024	Pending Customer Response

# PERSON RESPONSIBLE:

Jacob Colley

# **REQUEST:**

Provide a detailed description for how Duke Kentucky accounts for customers participating in service under NM-1 Tariff in its utility planning.

## **RESPONSE:**

For purposes of this discovery response, the Company considers "utility planning" to incorporate Distribution Planning, Transmission Planning, Generation Planning, Fixed Resource Requirements (FRR) Planning, and Short-term Energy Planning (i.e., Day-ahead energy purchases).

#### **Distribution Planning:**

The Company does not incorporate a forecast of customer-generator penetration when evaluating distribution capacity constraints in its distribution planning process. To the extent that existing customer-generators on the system modify circuit or substation loads, they would be reflected in historic load in the analysis and solutioning to address capacity needs. These impacts might be or might not be incorporated in historic load subject to their output at the time. The embedded net metering impacts are not identified in the analysis.

The presence of non-dispatchable customer-generators, such as solar, does not reduce the distribution capacity that Duke Energy Kentucky requires. The distribution system is sized to ensure sufficient capacity is available on the peak day/time without the non-dispatchable customer-generators.

1

#### Transmission Planning:

The starting-point loads used in Transmission planning studies are updated yearly with prior year substation peak load data, which are net of customer-generator contribution present, if any, at the time of system peak. Future year aggregate loads in the models are then aligned with the system aggregate load forecast data provided by Load Forecasting. The latter include the impact of forecasted customer-generator solar. Transmission study results are subsequently validated against PJM Transmission Planning models.

#### **Generation Planning:**

Currently existing rooftop solar may reduce actual load in a particular hour subject to the output in that hour. Historic load data is used to develop models for load forecasting. In addition, the Company forecasts incremental adoption of rooftop solar. The forecasted incremental adoption of solar is incorporated into future load forecast numbers by developing hourly solar generation profiles that are reflective of energy generated from rooftop solar. These hourly profiles are embedded into the load forecast and any generation from solar at the system peak would serve to reduce the peak in that hour.

#### Fixed Resource Requirements (FRR) Planning:

PJM provides Duke Energy Kentucky with a capacity requirement, or an amount equal to the PJM forecasted DEK coincident peak load plus required reserve margin. Every year, the Company develops and submits an FRR plan to meet the Company's capacity requirement specified by PJM. Net Metering resources are not included in the FRR Plan submitted by the Company as specific generation resources. Net Metering resources, to the extent that they were generating during historic peak coincident load hours or specifically included in PJM's distributed solar generation forecast, indirectly may reduce the Company's load plus reserve margin requirement under its FRR plan.

# Short-term Energy Planning:

See the Company's response to STAFF-DR-04-001(b).

# **PERSON RESPONSIBLE:**

Nick Melillo (Distribution Planning) Tim Hohenstatt (Transmission Planning) Matt Kalemba (Generation Planning) John Swez (Fixed Resourced Requirements Planning / Short-term Energy Planning)

# **REQUEST:**

If a customer opts-out of automated meter read under Rider AMO, list each category and subcategory of information that can be downloaded manually from that module.

# **RESPONSE:**

All electronics and metering capabilities for DEK electric meters are integrated into the meter itself, not a separate "module" so this answer applies to the meter. The meter that DEK currently uses for Rider AMO is a standard AMI meter that has all communications capabilities disabled. There are two consumption displays on DEK AMI meters as follows: 1) 01 kWh Del, 2) 02 kWh Rec. The first display shows total kilowatt hours delivered from the grid to the customer. The second display shows total kilowatt hours received from the customer to the grid. These two readings are visually collected onsite by DEK field personnel and hand entered into a collection device once per month.

# **PERSON RESPONSIBLE:** Jacob Colley

STAFF-DR-04-008 PUBLIC

# **REQUEST:**

Refer to Duke Kentucky's 2021 Integrated Resource Plan (IRP), Table H.3 Load and Resources, page 169. Provide an updated table in similar format from 2024- 2035. Include in the response any known capacity additions that would increase load, any known loss of load, the Installed Capacity and Unforced Capacity, or changes in Duke Kentucky's forecasting methodology that was used in the IRP.

# **RESPONSE:**

#### **CONFIDENTIAL PROPRIETARY TRADE SECRET** (as to Attachment only)

Please note that the Company's 2024 IRP is still under development and that CONFIDENTIAL STAFF-DR-04-008 Attachment should be considered preliminary memoranda, subject to further validation and possible change prior to the submission of the IRP.

Please find the attached file CONFIDENTIAL STAFF-DR-04-008 Attachment, which updates Table H3 from the 2021 DEK IRP. Updates include:

- Increase in Reserve Margin reflecting PJM's latest requirements.
- Update peak load forecast to Spring 2024 assumptions

Because the 2024 DEK IRP is still under development, DEK assumed the same capacity values from the 2021 IRP filing.

# PERSON RESPONSIBLE: Matt Kalemba

# CONFIDENTIAL PROPRIETARY TRADE SECRET

# STAFF-DR-04-008 CONFIDENTIAL ATTACHMENT

# FILED UNDER SEAL