VERIFICATION

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 post-hearing data requests and that the answers contained therein are true and correct to the best of his knowledge, information and belief.

Bruce L. Sailers
Bruce Sailers Affiant

Subscribed and sworn to before me by Bruce Sailers on this 25TH day of JUNE, 2024.

Adele M. Frisch
NOTARY PUBLIC

My Commission Expires: 1/5/2029

VERIFICATION

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

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

Jacob Colley

Jacob Colley Affiant

Subscribed and sworn to before me by Jacob Colley on this 25th day of June, 2024.

TIFFANY ROBINSON NOTARY PUBLIC MECKLENBURG COUNTY, NC

Tiffany Robinson

NOTARY PUBLIC

My Commission Expires:
February 4, 2026

KyPSC Case No. 2023-0413
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Duke Energy Kentucky
Case No. 2023-00413
STAFF's Second Set Post Hearing Data Requests
Date Received: June 18, 2024

STAFF-PHDR-02-001

REQUEST:

Refer to Duke Kentucky's response to Commission Staff's Post-Hearing Request for Information (Staff's Post-Hearing Request), Item 4.

a. Explain whether an inverter can safely handle a solar array sized (within limits) to produce a maximum power output capacity that exceeds the maximum power inverter rating.

b. If not, explain why not.

c. If so, confirm that a NM-1 customer-generator can increase the maximum power output capacity of its solar arrays to exceed the maximum power inverter rating without being removed from NM-1 and enrolled in NM-2 if the capacity of the inverter is not increased.

d. If not confirmed, explain why not.

e. If confirmed, explain whether the customer-generator must notify Duke Kentucky that they are increasing the capacity of their solar arrays.

RESPONSE:

a. The Company cannot speak to the integrity of an inverter's ability to exceed rated capacities.

b. The Company's interconnection study is based on the inverter capacity rating rather than the solar array sizing. Our studies are conducted at the continuous grid output for the inverter to evaluate that the system operates efficiently and safely.

c. If a customer adds more panels after the initial installation without upgrading the inverter, it is usually manageable without the need for additional studies or modifications. This change would not typically trigger a transition from NM-1 to

NM-2, so long as the new solar panel capacity does not trigger a need for an upgrade to an inverter with higher grid output (AC) capacity.

d. Customers can install solar array panels that generate power at a dc rating exceeding the inverter's rated AC capacity; however, the power output of the customer's panel-inverter assembly will not surpass the inverter's grid output capacity.

e. Per the Company's Level 1 Interconnection Application, "Customer shall agree that, without the prior written permission from Company, no changes shall be made to the generating facility as initially approved. Increases in generating facility capacity will require a new 'Application for Interconnection and Net Metering' which will be evaluated on the same basis as any other new application. Repair and replacement of existing generating facility components with like components that meet UL 1741 certification requirements for Level 1 facilities and not resulting in increases in generating facility capacity is allowed without approval."[1] However, the notification of an increase in the generation capacity would not remove a customer from NM-1 as long as the inverter's rated grid output capacity was not increased.

PERSON RESPONSIBLE: Jacob Colley

[1] Available at https://www.duke-energy.com/-/media/pdfs/for-your-business/generate-your-own-renewable/kentucky/level1applicationkentucky.pdf?rev=389f1b5b22474c888f0a74b45b23cd66

Duke Energy Kentucky
Case No. 2023-00413
STAFF's Second Set Post Hearing Data Requests
Date Received: June 18, 2024

STAFF-PHDR-02-002

REQUEST:

Refer to Duke Kentucky's response to Staff's Post-Hearing Request, Item 8. Provide an estimate of the time and cost it would take to implement the changes that would allow Advanced Meter Opt-Out customers to participate in NM-2.

RESPONSE:

Based on an initial high-level assessment, the Company projects approximately 12 months for implementation with an estimated cost of approximately $1.6 million for required modifications to both the field collection system (FCS) and the customer billing system. This estimated budget would include items such as required resources, development efforts, testing and any potential contingencies to ensure a smooth and successful implementation process.

PERSON RESPONSIBLE: Jacob Colley

Duke Energy Kentucky
Case No. 2023-00413
STAFF's Second Set Post Hearing Data Requests
Date Received: June 18, 2024

STAFF-PHDR-02-003

REQUEST:

Refer to Duke Kentucky's response to Staff's Post-Hearing Request, Item 3. That answer is not responsive.

a. Confirm that the required notice is a new interconnection application. If not confirmed, explain why not.

b. Confirm that the obligation of notification lies with the customer. If confirmed, explain any consequences that Duke Kentucky will impose on NM-1 customer, if the customer fails to notify or otherwise communicate with the utility.

c. Provide the steps in this process of how a customer is notified that they will be removed as a NM-1 customer and enrolled under the NM-2 Tariff.

d. Provide the information Duke Kentucky provides to inform the customer of a switch from NM-1 to the NM-2 Tariff

RESPONSE:

a. Yes, NM-1 customers increasing the size of their inverter are required to notify the company by submitting a new interconnection application. See response to part b below.

b. As outlined in the interconnection application the responsibility of notifying the company regarding inverter upgrades lies with the customer. A copy of the interconnection application is available at https://www.duke-energy.com/-/media/pdfs/for-your-business/generate-your-own-renewable/kentucky/level1applicationkentucky.pdf?rev=389f1b5b22474c888f0a74b45b23cd66
Please see page 2, Item 10 for the relevant language ("Customer shall agree that, without the prior written permission from Company, no changes shall be made to the generating facility as initially approved. Increases in generating facility capacity will require a new "Application for Interconnection and Net Metering" which will

be evaluated on the same basis as any other new application. Repair and replacement of existing generating facility components with like components that meet UL 1741 certification requirements for Level 1 facilities and not resulting in increases in generating facility capacity is allowed without approval.")

If a customer increases the size of their inverter without informing the company and their generating facility is deemed noncompliant with the company's net metering tariff requirements or interconnection agreement, the company may issue a notice to the customer. This notice will detail the specific noncompliance conditions and provide the customer with a reasonable period to address and rectify the noncompliance before any further action is taken.

In emergency situations where the ongoing interconnection and operation of the generating facility with the company's electric system presents, contributes to, or may potentially lead to a system emergency on either the company's or the customer's electric system, the company retains the right and authority, at its discretion, to isolate the generating facility or instruct the customer to cease the operation of the generating facility.

It is crucial for customers to fulfill their obligation to notify the company of any inverter upgrades to ensure compliance with regulations and uphold the safety and reliability of the electric system. Effective communication and cooperation between customers and the company are essential to promptly address any issues that may arise.

c. If the applying customer is currently classified as a NM-1 customer, the initial communication following the application will contain information informing the customer that any increase in inverter capacity will lead to the termination of NM-1 eligibility and as a result, the customer will be automatically enrolled in NM-2, if approved and available.

   Following the approval of NM-2 tariff in this proceeding, the company will also update its website to inform customers about the upcoming changes related to net metering options. This update will provide easy access for customers to be informed about the transition and any associated implications should they be considering net metering.

d. Upon approval of NM-2 tariff in this proceeding, processes will be updated and implemented to notify customers of the switch from NM-1 to NM-2. The information will be shared via email or mail based on the customer preference during the interconnection application process. The Company may call the customer at any point to discuss the change as well.

PERSON RESPONSIBLE: Jacob Colley

Duke Energy Kentucky
Case No. 2023-00413
STAFF's Second Set Post Hearing Data Requests
Date Received: June 18, 2024

STAFF-PHDR-02-004

REQUEST:

Confirm that, if a neighborhood association within subdivision wanted to aggregate the output from the associated roof top solar arrays and the neighborhood association was compliant with completing an application and an interconnection study in all respects as if it were an individual household, Duke Kentucky would not allow this arrangement under NM-1 or NM-2. If not confirmed, explain why not.

RESPONSE: Confirmed.

PERSON RESPONSIBLE: Bruce Sailers.