

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

**KENTUCKY SOLAR INDUSTRIES ASSOCIATION, INC.  
POST-HEARING REQUESTS FOR INFORMATION TO  
DUKE ENERGY KENTUCKY, INC.**

Come now the Kentucky Solar Industries Association, Inc. (KYSEIA), by and through counsel, and in accordance with the Public Service Commission’s instructions during the May 21, 2024 evidentiary hearing, submits its Post-Hearing Requests for Information to Duke Energy Kentucky, Inc. (“Duke” also “Company”).

- 1) In each case in which a request seeks information provided in response to a request of Commission Staff, reference to the Company’s response to the appropriate Staff request will be deemed a satisfactory response.
- 2) Please identify the Company’s witness who will be prepared to answer questions concerning the request during an evidentiary hearing.
- 3) These requests shall be deemed continuing and require further and supplemental responses if the Company receives or generates additional information within the scope of these request between the time of the response and the time of any evidentiary hearing held by the Commission.

- 4) If any request appears confusing, please request clarification directly from Counsel for KYSEIA.
- 5) To the extent that the specific document, workpaper, or information as requested does not exist, but a similar document, workpaper, or information does exist, provide the similar document, workpaper, or information.
- 6) To the extent that any request may be answered by way of a computer printout, please identify each variable contained in the printout which would not be self-evident to a person not familiar with the printout.
- 7) If the Company has any objections to any request on the grounds that the requested information is proprietary in nature, or for any other reason, please notify Counsel for KYSEIA as soon as possible.
- 8) For any document withheld through a claim of privilege, state the following: Date; author; addressee; indicated or blind copies; all person to whom distributed, shown, or explained; and the nature and legal basis for the privilege asserted.
- 9) In the event that any document called for has been destroyed or transferred beyond the control of the Company, state: The identity of the person by whom it was destroyed or transferred and the person authorizing the destruction or transfer; the time, place, and method of destruction or transfer; and, the reason(s) for its destruction or transfer. If destroyed or disposed of by operation of a retention policy, state the policy.
- 10) As the Company discovers errors in its filing and/or responses, please provide an update as soon as reasonable that identifies such errors and provide the document to support any changes.

WHEREFORE, KYSEIA respectfully submits its Post-Hearing Requests for Information to Duke.

Respectfully submitted,

/s/ David E. Spenard  
Randal A. Strobo  
David E. Spenard  
STROBO BARKLEY PLLC  
730 West Main Street, Suite 202  
Louisville, Kentucky 40202  
Phone: 502-290-9751  
Facsimile: 502-378-5395  
Email: rstrobo@strobobarkley.com  
Email: dspenard@strobobarkley.com  
*Counsel for KYSEIA*

### **Notice And Certification For Filing**

Undersigned counsel provides notice that the electronic version of the paper has been submitted to the Commission by uploading it using the Commission's E-Filing System on this 24<sup>th</sup> day of May 2024 in conformity with the Commission's January 5, 2024 Order of procedure in the instant case. Pursuant to the Commission's Orders in Case No. 2020-00085, *Electronic Emergency Docket Related to Novel Coronavirus Covid-19*, the paper, in paper medium, is not required to be filed.

/s/ David E. Spenard

### **Notice And Certification Concerning Service**

No party has been excused from the electronic filing procedures in the instant proceeding.

/s/ David E. Spenard  
David E. Spenard

**KENTUCKY SOLAR INDUSTRIES ASSOCIATION, INC.  
POST-HEARING REQUESTS FOR INFORMATION TO  
DUKE ENERGY KENTUCKY, INC.**

1. Reference: Duke Response to KYSEIA 2<sup>nd</sup> Request for Information, Item 9, Attachment 1 and Attachment 2 and KYSEIA Cross-Examination Exhibit 6. Attachment 1 shows by month of year, day of month, and hour of day, the modeled AC System Output (kW) produced through the PV Watts calculator in Eastern Standard Time. The hour column contains values 0 through 23. Attachment 2 shows by date (of the cost of service study period) and hour of day the usage amounts for the Duke Energy Kentucky RS rate class. The hour column contains values 1 through 24. Please provide the following:
  - a. A schedule, by month of year, day of month, and hour of day, that reconciles Attachment 2 to Attachment 1 for each entry on Attachment 1. For example, demonstrate which month of year, day of month, and hour of day on Attachment 1 corresponds to Hour 1 for 04/01/2021 by reference to the Eastern Standard Time value per Attachment 1.
  - b. Separate from the schedule requested in part a (above), for Attachment 1, by hour of day (0 through 23), state the time of day corresponding with each hour value. For example, state whether hour 0 corresponds to the time from 12:00 a.m. through 12:59 a.m., and similarly state the time for each of the 24 hours.
  - c. Separate from the schedule requested in part a (above), for Attachment 2, by hour of day (1 through 24), state the time of day corresponding with each hour value. For example, state whether hour 1 corresponds to the time from 12:00 a.m. through 12:29 a.m., and similarly state the corresponding time for each of the 24 hours.
  - c. For Attachment 2, by date and by hour, state whether the hour value is stated in Eastern Standard Time or Eastern Prevailing Time.
2. Reference: Duke Response to KYSEAI 2<sup>nd</sup> Request for Information, Item 9, Attachment 1 and Attachment 2. State, separately for each attachment, whether the total number of hours observed in each schedule corresponds to 8,760 data points for the hours of the period. If the total number of hours observed in an attachment does not correspond to 8,760 data points, state the number of data points for the schedule in the attachment.