

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC 2024 INTEGRATED )  
RESOURCE PLAN OF DUKE ENERGY ) CASE NO. 2024-00197  
KENTUCKY, INC. )

**POST HEARING REQUESTS FOR INFORMATION OF KENTUCKY  
SOLAR ENERGY SOCIETY, KENTUCKIANS FOR THE  
COMMONWEALTH, AND KENTUCKY RESOURCES COUNCIL  
TO DUKE ENERGY KENTUCKY**

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Dated: December 21, 2024

## DEFINITIONS

1. "Document" means the original and all copies (regardless of origin and whether or not including additional writing thereon or attached thereto) of any memoranda, reports, books, manuals, instructions, directives, records, forms, notes, letters, or notices, in whatever form, stored or contained in or on whatever medium, including digital 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 business address, and 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.), identifying number, 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 and why it was so disposed.
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 data requests 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 other 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", "Duke Energy", or "Duke", means Duke Energy Kentucky, Inc., and/or any of its officers, directors, employees or agents who may have knowledge of the particular matter addressed, and affiliated companies including Duke Energy Corporation.
12. "DEOK" means Duke Energy of Ohio and Kentucky.
13. "Joint Intervenors," or "Joint Movants" means Kentucky Solar Energy Society, Kentuckians for the Commonwealth, and Kentucky Resources Council who have moved for the status of full intervention as joint intervenors in this matter.
14. Unless otherwise specified in each individual request the term "tariff" means the tariff as filed in this matter by Company.
15. "IRP" means integrated resource plan.
16. "2024 IRP" means the Kentucky 2024 Duke Energy Integrated Resource Plan.
17. "ELCC" means effective load carrying capacity.
18. "IRA" means the Inflation Reduction Act of 2022.
19. "ITC" means investment tax credits.
20. "O&M" means operation & maintenance.
21. "PTC" means production tax credits.
22. "PV" means solar photovoltaic.
23. "PVRR" means present value revenue requirement.
24. "TFP" means the Transmission Facilitation Program.
25. "SMR" means small modular reactor.
26. "UCAP" means unforced capacity.

## **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 requests for information 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 Joint Intervenors. 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 data request 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. Wherever the response to a request consists of a statement that the requested information is already available to Joint Intervenors, please provide a detailed citation to the document that contains the information. This citation shall include the title of the document, relevant page number(s), and, to the extent possible, paragraph number(s) and/or chart/table/figure number(s).
8. If you claim a privilege including, but not limited to, the attorney-client privilege or the work product doctrine, as grounds for not fully and completely responding to any discovery request, please describe the basis for your claim of privilege in sufficient detail so as to permit Joint Intervenors or the Commission to evaluate

the validity of the claim. With respect to documents for which a privilege is claimed, please produce a "privilege log" that identifies the author, recipient, date, and subject matter of the documents or interrogatory answers for which you are asserting a claim of privilege and any other information pertinent to the claim that would enable Joint Intervenors or the Commission to evaluate the validity of such claims.

9. Whenever the documents responsive to a discovery request consist of modeling files (including inputs or output) and/or workpapers, the files and workpapers should be provided in machine-readable electronic format (e.g., Microsoft Excel), with all formulas and cell references intact.
10. The interrogatories are to be answered under oath by the witness(es) responsible for the answer.

**POST HEARING DATA REQUESTS PROPOUNDED TO  
DUKE ENERGY KENTUCKY BY JOINT INTERVENORS**

Joint Intervenors hereby tender the following initial requests for information to the Company:

- 3.1. Please refer to Appendix A of the 2024 IRP, and answer the following requests.
  - a. Are the future transmission projects identified in Appendix A the only transmission projects evaluated by the Company in the last year?
    - i. If not, please list additional potential transmission projects evaluated, explain the reason(s) for not moving forward with each such project, and provide supporting analysis, if any.
  - b. Are the future distribution projects identified in Appendix A the only distribution projects evaluated by the Company in the last year?
    - i. If not, please list additional potential distribution projects evaluated, explain the reason(s) for not moving forward with each such project, and provide supporting analysis, if any.
  - c. Please confirm that the transmission projects identified in Appendix A do not require Commission approval of a Certificate of Need and Public Convenience. If anything but confirmed, please explain.
  - d. Please confirm that the distribution projects identified in Appendix A do not require Commission approval of a Certificate of Need and Public Convenience. If anything but confirmed, please explain.
  - e. Please explain whether the listed transmission projects are part of PJM's Regional Transmission Expansion Plan ("RTEP"). If included in PJM's RTEP, please explain whether each transmission project is a Regional RTEP Project, a Subregional RTEP Project, or a Supplemental Project.
  - f. Outside of an Integrated Resource Plan proceeding, please identify each proceeding before the Commission wherein the Company's transmission planning processes are subject to review.
  - g. Outside of an Integrated Resource Plan proceeding, please identify each proceeding before the Commission wherein the Company's distribution planning processes are subject to review.
- 3.2. Please confirm that PJM's locational marginal price includes transmission-related cost elements. If anything but confirmed please explain.
- 3.3. Please state whether the Company is aware of the recommendation from PJM's Independent Market Monitor to require transmission owners to

investigate the applicability and potential cost savings of Grid Enhancing Technology (GET) and that all PJM transmission owners implement cost effective GET, subject to NERC standards and guidelines, subject to review by NERC, PJM and the MMU, and approval by FERC. If anything but confirmed, please explain.


- 3.4. Please provide the Company's most recent evaluation of Grid Enhancing Technologies<sup>1</sup> and potential cost-effectiveness of GET in the Duke Energy Kentucky territory or in the DEO&K PJM Load Zone.
- 3.5. Please refer to following statement from page 6 of Monitoring Analytics' most recent Quarterly State of the Market report: "The total cost of wholesale power increased \$2.04 per MWh, or 3.8 percent, from \$53.02 per MWh in the first nine months of 2023 to \$55.06 per MWh in the first nine months of 2024. Energy (59.2 percent), capacity (6.4 percent) and transmission charges (31.5 percent) are the three largest components of the total cost of wholesale power, comprising 97.1 percent of the total cost per MWh in the first nine months of 2024. Starting in the third quarter of 2019, the cost of transmission per MWh of wholesale power has been higher than the cost of capacity."
  - a. Would it be reasonable to infer from these PJM-wide total cost of wholesale power calculations that the transmission charges component of the wholesale rates paid by the Company over the same period were roughly 30 percent. If not, please explain why not.
  - b. To the extent known, what portion of the wholesale power rates paid by Duke Energy Kentucky are attributable to transmission charges.
- 3.6. Please identify the approximate proportion of the Company's approved revenue requirement attributable to (a) transmission related costs, (b) distribution related costs, and (c) generation related costs.
- 3.7. Please refer to the testimony of Mr. Timothy Duff in the Hearing Video Transcript ("HVT") for this matter at 12/10/2024, 4:40:40, and provide the most recent:

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<sup>1</sup> Grid Enhancing Technologies maximize the transmission of electricity across the existing system through a family of technologies that include sensors, power flow control devices, and analytical tools. To the extent that further clarification would be helpful, Joint Intervenors refer the Company to Department of Energy resources related to GET. DOE, Grid-Enhancing Technologies: A Case Study on Ratepayer Impact, available at <https://www.energy.gov/sites/default/files/2022-04/Grid%20Enhancing%20Technologies%20-%20A%20Case%20Study%20on%20Ratepayer%20Impact%20-%20February%202022%20CLEAN%20as%20of%20032322.pdf>

- a. The projected avoided costs used in the Company's most recent Application to Amend its DSM Programs, by cost component, and
- b. Actual avoided costs used in calculating the Company's most recent Adjustment of the DSM Cost Recovery Mechanisms.

Respectfully Submitted,



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### **CERTIFICATE OF SERVICE**

In accordance with the Commission's July 22, 2021 Order in Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19*, this is to certify that the electronic filing was submitted to the Commission on December 21, 2024; that the documents in this electronic filing are a true representation of the materials prepared for the filing; and that the Commission has not excused any party from electronic filing procedures for this case at this time.

  
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Byron L. Gary