

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

In the Matter of:

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

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**DUKE ENERGY KENTUCKY, INC.’S**  
**MOTION FOR AN EXTENSION OF TIME**

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Comes now Duke Energy Kentucky, Inc. (Duke Energy Kentucky or Company), by counsel, pursuant to 807 KAR 5:001, Section 9, and other applicable law, and moves the Kentucky Public Service Commission (Commission) for an extension of fourteen business days, to February 7, 2025, to file its responses to Commission Staff’s Post Hearing Data Request, Item 9, as issued in its December 16, 2024, Post-Hearing Requests for Information.

Item 9 requests as follows:

Refer to Case No. 2024-00285,<sup>1</sup> Application, page 11. Duke Kentucky indicates that the transfer to full Reliability Pricing Model (RPM) participation in PJM best protects customers from the risk of a large energy intensive customer locating in its service territory and requiring service prior to Duke Kentucky being able to build or acquire generation.

- a. Provide an updated load forecast based upon a hypothetical energy intensive customer locating in Duke Kentucky’s service territory and requiring service prior to it being able to build or acquire generation. The response should include two different forecasts, one with the customer being a large industrial or manufacturing entity that will require more than one hundred of long-term employees located in the territory after construction and the other being a large load customer, such as a data center, requiring less

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<sup>1</sup> *Electronic Application of Duke Energy Kentucky, Inc. to Become a Full Participant in the PJM Interconnection LLC, Base Residual, and Incremental Auction Construct for the 2027/2028 Delivery Year and for Necessary Accounting and Tariff Changes*, Case No. 2024-00285, at 11 (Sep. 6, 2024).

than 50 long-term employees located in the territory after construction.

- b. Utilizing each of the two updated hypothetical load forecasts and all else being equal, rerun the EnCompass model's resource optimization and production cost routines for Duke Kentucky's six optimized portfolios represented in IRP table 6.1-6.6, pages 43-45.
- c. Also provide the associated present value revenue requirement (PVRR) for the new analyses run similar to that provided in Duke Kentucky's response to Staff's First Request, Item 18.

This request directs the Company to perform new load forecasts and to re-run its modeling optimization and production cost models under two scenarios, for each of the Company's six portfolios contained in its IRP. Additionally, the request then directs the Company to develop a new PVRR for the newly requested analysis.

Under the current procedural schedule issued by the Commission on December 16, 2024, (Scheduling Order) the Company's responses to the post hearing data requests are due January 20, 2025. While the Commission Staff submitted its data requests on December 16, 2024, four days in advance of the Scheduling Order's date for filing of requests, graciously providing the Company a little more than a month to complete its responses, nonetheless, the Company respectfully submits that additional time, approximately fourteen (14) business days, is required to complete the requested analysis and modeling in response to Item 9.

The Company submits that good cause exists to grant the additional time to provide its response to Item 9 due to Item 9 requiring the Company to generate two additional hourly load forecasts that cover the entire 15-year planning period for the IRP, the complex nature of the modeling requested, the time to needed to perform and examine the modeling results of the twelve requested cases, as well as resource constraints due to planned time off of modeling personnel over the holidays, personnel

changes within the Company's modeling team, and the fact that the shared corporate modeling resources had been allocated to other projects, necessitating the shifting of work in progress to address the Commission's requests.

The team of personnel who perform the IRP modeling and load forecasts are shared resources among all Duke Energy Corp utilities. While Duke Energy Kentucky has its own individual responsible for the Company's modeling, the team of analytical personnel are shared resources. Additionally, due to the Christmas and New Year holidays, modeling personnel had planned time off, which delayed the ability to start the modeling due to other work that was in progress. Additionally, as these analytical personnel were shared resources, work for other jurisdictions had been planned to be performed prior to the Commission issuing its data requests. Accordingly, this planned work must be redistributed and reprioritized where practical to do so in order to perform the Commission's requested analysis. Completing the analysis in Item 9 is further complicated due to changes in personnel who left the modeling organization at the end of the year creating a resource constraint until the vacancy can be filled. The modeling and analysis requested in Item 9 will require time to program, perform, review, validate, and to put into the requested format for Commission review.

As a result of the aforementioned and contributing factors, the Company is unable to complete this analysis by January 20, the due date for responses. The Company anticipates that it will submit its responses to all other data requests from the Commission and intervening parties by January 20, 2025, as currently provided in the Commission's Scheduling Order. However, additional time, approximately fourteen business days will provide the Company with sufficient time to complete the Item 9 response modeling. The

Company will endeavor to complete its analysis as soon as possible in advance of February 7, 2025, the requested fourteen business day extension.

Although the Company shares the interests of stakeholders in concluding this proceeding as expeditiously as possible, because this proceeding does not involve an application by the utility and the Commission does not “approve” the Company’s IRP, the KRS 278.019 deadline for final orders by the Commission is inapplicable. In this proceeding, the Commission does not have a statutory deadline for completing its investigation. Moreover, any perceived prejudice by any interested stakeholder by granting the Company’s request for additional time to file its response to this single Item, could be mitigated by adjusting the remaining Schedule Order dates, as necessary. The Scheduling Order currently provides the opportunity for Parties to submit post-hearing comments on or before February 3, 2025, the Commission Staff to issue its Report and Recommendations by March 10, 2025, and comments to the Staff Report by March 24, 2025. A fourteen business-day extension for these deadlines could provide parties with sufficient opportunity to review the Company’s response to Item 9 to the extent it may inform their post-hearing comments or the Staff Report.

WHEREFORE, Duke Energy Kentucky, Inc. respectfully requests the Commission enter an Order granting the Company a fourteen-business day extension, through February 7, 2025, to file its response to Commission Staff’s Item 9 as contained in its December 16, 2024, Post-Hearing Requests for Information.

Respectfully submitted,

DUKE ENERGY KENTUCKY, INC.

/s/Rocco D'Ascenzo

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**CERTIFICATE OF SERVICE**

This is to certify that the foregoing electronic filing is a true and accurate copy of the document being filed in paper medium; that the electronic filing was transmitted to the Commission on January 9, 2025; 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>2</sup>

*/s/Rocco D'Ascenzo*  
\_\_\_\_\_ *Counsel for Duke Energy Kentucky, Inc.*

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<sup>2</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).*