

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

DUKE ENERGY KENTUCKY, INC.'s POST REPLY HEARING COMMENTS

Duke Energy Kentucky, Inc., (Duke Energy Kentucky or the Company) appreciates this opportunity to submit responsive comments to Intervenor post-hearing comments as provided by the Commission's March 11, 2025, Order. The Commission's initial December 16, 2024, procedural order and the subsequent January 17, 2025, amendment did not provide the Company this opportunity. To that end, in the interest of avoiding unnecessary repetition in the Commission's docket, the Company offers these brief reply comments.

The Company timely submitted its Post-Hearing Comments on February 20, 2025, and stands by those comments and incorporates the same herein. Further, the Company continues to endorse and support its June 21, 2024, Integrated Resource Plan (IRP) analysis, its responses to data requests submitted in this proceeding, as well as in other proceedings that have been incorporated by reference pursuant to Commission Order. Finally, the Company stands by the testimony of its witnesses provided at the December 10, 2024, evidentiary hearing. Nothing in the Intervenors' Post-Hearing Comments causes the Company to change its position or recommendations. The Company continues to believe that its IRP provides a reasonable roadmap to meet future energy and demand requirements for its Kentucky customers without compromising reliability of service, energy affordability or the power demands of a growing region. The IRP factors in policies at both the state and federal level that were known at the time the IRP analysis

was performed, and the document is consistent with Commission regulations and prior IRP submissions.

The Commission should not require the Company to perform unreasonable additional and future analysis beyond what is typically and historically done as part of resource planning under Kentucky regulations as is being advocated by some intervening parties. The Company reiterates its position that detailed transmission and distribution analysis is neither useful nor possible in the of context long-term, generic resource planning. Planning and analysis of the transmission and distribution systems is necessarily location-specific and project-specific with respect to customer demand and both demand-side and supply-side resources. Long-term resource planning is, by design and by necessity, based on representative, generic resource blocks and is location agnostic. Certain grid-enhancing technologies have the potential to offer benefits for real-time efficiency gains and system optimization of the electric grid, but real-time grid operations and long-term resource planning are categorically different undertakings requiring fundamentally different tools and analysis. Although each can inform the other (most notably, in the 2024 IRP, in the form of estimated generic transmission network upgrade costs for new, generic resources), detailed transmission and distribution planning and analysis cannot be meaningfully integrated into the IRP process.

Duke Energy Kentucky reserves the right to submit additional comments to the forthcoming Staff Report in accordance with the Commission's procedural schedule, and to the extent necessary, will address any issues raised by intervenors that are impactful to the Staff Report at that time.

Respectfully submitted,

DUKE ENERGY KENTUCKY, INC.

/s/Rocco D'Ascenzo

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

(513) 287-4320 (telephone)

(513) 370-5720 (fax)

rocco.d'ascenzo@duke-energy.com

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 March 14, 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.¹

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

¹ Case No. 2020-00085, *In the Matter of Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC July 22, 2021), Order.