

**KyPSC Case No. 2024-00197**  
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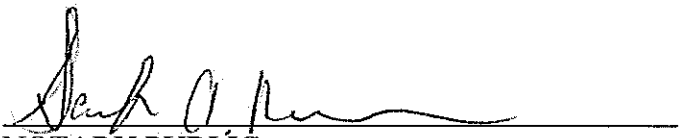
VERIFICATION

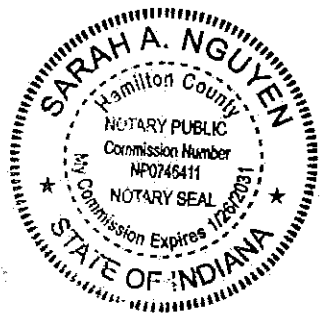
STATE OF INDIANA            )  
  )  
COUNTY OF HENDRICKS    )        SS:

The undersigned, Timothy Hohenstatt, Director Transmission Planning, 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.

  
\_\_\_\_\_  
Timothy Hohenstatt Affiant.

Subscribed and sworn to before me by Timothy Hohenstatt on this 21<sup>st</sup> day of JANUARY, 2025.

  
\_\_\_\_\_  
NOTARY PUBLIC



My Commission Expires: 1/26/2031



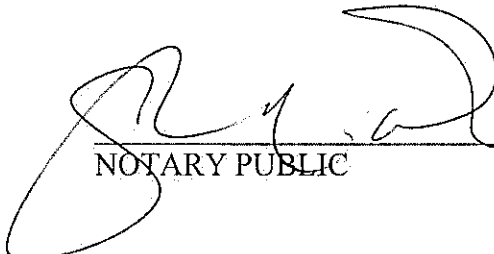
VERIFICATION

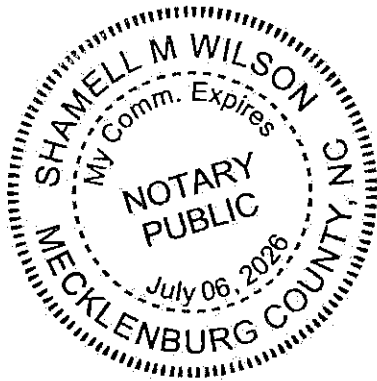
STATE OF NORTH CAROLINA     )  
  )  
COUNTY OF MECKLENBURG    )     SS:

The undersigned, John D. Swez, Managing Director, Trading and Dispatch, 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.

  
John D. Swez, Affiant

Subscribed and sworn to before me by John D. Swez on this 16<sup>th</sup> day of January, 2025.


  
NOTARY PUBLIC  
My Commission Expires:



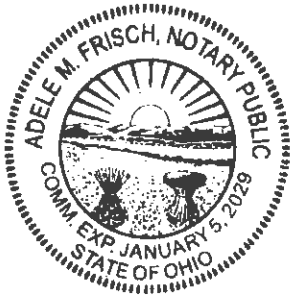
VERIFICATION

STATE OF OHIO                    )  
  )       SS:  
COUNTY OF HAMILTON        )

The undersigned, Sarah Lawler, VP Rates & Regulatory Strategy, being duly sworn, deposes and says that she 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 her knowledge, information and belief.

  
\_\_\_\_\_  
Sarah Lawler Affiant

Subscribed and sworn to before me by Sarah Lawler on this 13<sup>TH</sup> day of JANUARY  
2025



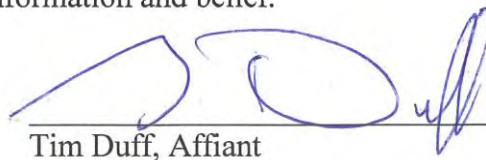
  
\_\_\_\_\_  
NOTARY PUBLIC

My Commission Expires: 1/5/2029

**VERIFICATION**

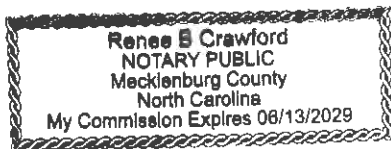
STATE OF NORTH CAROLINA     )  
  )     **SS:**  
COUNTY OF MECKLENBURG     )

The undersigned, Tim Duff, GM Customer Solutions Regulatory Enablement, 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.

  
\_\_\_\_\_  
Tim Duff, Affiant

Subscribed and sworn to before me by Tim Duff on this 6<sup>th</sup> day of January, 2024.5

  
\_\_\_\_\_  
NOTARY PUBLIC



My Commission Expires: 06/13/2029

**Duke Energy Kentucky**  
**Case No. 2024-00197**  
**KSES First Set Post Hearing Data Requests**  
**Date Received: December 21, 2024**

**KSES-PHDR-01-001**

**REQUEST:**

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.

**RESPONSE:**

- a. PJM and Duke Energy Kentucky each perform annual assessments of the Duke Energy Kentucky transmission system against NERC TPL-001 and local reliability criteria, respectively. Those results identify transmission system needs and form the logical basis for future transmission planning projects. There is currently no identifiable need for additional projects beyond what is identified in Appendix A for the time horizon of the 2024 IRP.
  - i. Not Applicable.
- b. The future distribution projects listed were the only distribution projects evaluated by the Company to be completed in the 2024-2026 timeframe.
  - i. There are additional distribution projects being evaluated for years 2027 and beyond. These projects were not included in the 2024-2026 plan based on the timing for the load needed. Covington add 22.4MVA transformer bank in 2027 and Weaver new substation with a 22.4 MVA transformer bank in 2028 were also evaluated.



- c. Objection. Calls for a legal opinion. Without waiving said objection, and to the extent discoverable, the transmission project identified in Appendix A has already received the Commission's approval of a Certificate of Need and Public Convenience.
- d. Objection. Calls for a legal opinion. Without waiving said objection, and to the extent discoverable, see KRS 278.020, ordinary extensions of existing systems in the usual course of business do not require a CPCN.
- e. The transmission project listed in Appendix A was included in PJM's RTEP as a Supplemental project.
- f. Objection, this request is overbroad and unduly burdensome and seeks information that is irrelevant to these proceedings. Moreover, this request is further objectionable insofar as it seeks information that is publicly available and thus is accessible to KSES. Finally, the request is objectionable to the extent it is requesting or seeking a legal opinion. Without waiving said objection and to the extent discoverable, the Company's transmission planning processes are subject to Commission approval if applicable under KRS 278.020 and are subject to review during base rate case proceedings.
- g. Objection, this request is overbroad and unduly burdensome and seeks information that is irrelevant to these proceedings. Moreover, this request is further objectionable insofar as it seeks information that is publicly available and thus is accessible to KSES. Finally, the request is objectionable to the extent it is requesting or seeking a legal opinion. Without waiving said objection and to the extent discoverable, the Company's distribution planning processes are subject to

Commission approval if applicable under KRS 278.020 and are subject to review during base rate case proceedings.

**PERSON RESPONSIBLE:** As to objections, Legal  
As to response, Timothy Hohenstatt – a., c., e., f.  
Nick Melillo – b., d., g.

**Duke Energy Kentucky**  
**Case No. 2024-00197**  
**KSES First Set Post Hearing Data Requests**  
**Date Received: December 21, 2024**

**KSES-PHDR-01-002**

**REQUEST:**

Please confirm that PJM's locational marginal price includes transmission-related cost elements. If anything but confirmed please explain.

**RESPONSE:**

Confirm. The total Locational Marginal Price (LMP) for a given PJM Pnode is the sum of the following components:

- System Marginal Energy Component
- Transmission Congestion Component
- Marginal Loss Component

The transmission congestion component and marginal loss component can both be considered a transmission-related cost element, although both are also impacted by the amount of generation from a specific resource as well.

**PERSON RESPONSIBLE:** John Swez

**Duke Energy Kentucky**  
**Case No. 2024-00197**  
**KSES First Set Post Hearing Data Requests**  
**Date Received: December 21, 2024**

**KSES-PHDR-01-003**

**REQUEST:**

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.

**RESPONSE:**

Confirm. As stated most recently on page 17 in the Quarterly State of the Market Report for PJM completed by Monitoring Analytics, LLC Independent Market Monitor for PJM dated November 11, 2024:

“The MMU recommends that all PJM transmission owners 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.”

**PERSON RESPONSIBLE:** John Swez

**Duke Energy Kentucky**  
**Case No. 2024-00197**  
**KSES First Set Post Hearing Data Requests**  
**Date Received: December 21, 2024**

**KSES-PHDR-01-004**

**REQUEST:**

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.

**RESPONSE:**

Objection. This request is overly broad, unduly burdensome and seeks information that is not likely to lead to the discovery of any relevant or admissible evidence. This request is further objectionable insofar as it seeks information that does not exist. Without waiving said objection, and to the extent discoverable, while the Company does consider new technologies as part of engineering standards improvement efforts, the Company has yet to perform a formal evaluation of GETS. FERC Order 1920 requires Regional Transmission Organization's (RTO's) to consider the use of GETS for generator interconnection and transmission planning solutions in lieu of traditional network upgrades. Per this Order, the Final rule became effective on August 12, 2024, 60 days after publication in the Federal Register on June 11, 2024. Absent delays transmission utilities and ISOs/RTOs must submit general compliance filings to FERC within 10 months of the

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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>

effective date, June 12, 2025. Accordingly, the Company has until June 12, 2025, to develop evaluation methods and criteria to determine the viability of potential GETS solution(s). The Company, in collaboration with other PJM transmission owners, participates in this effort by way of continued engagement in PJM's Transmission Expansion Advisory Committee.

**PERSON RESPONSIBLE:** As to objection, Legal  
As to response, Timothy Hohenstatt

**Duke Energy Kentucky**  
**Case No. 2024-00197**  
**KSES First Set Post Hearing Data Requests**  
**Date Received: December 21, 2024**

**KSES-PHDR-01-005**

**REQUEST:**

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.

**RESPONSE:**

- a. Although there are obvious differences between the Duke Energy Kentucky wholesale rate of electricity and that of PJM, the Company has no reason to believe that its wholesale rate composition is materially different than the entirety of PJM's wholesale rate.

b. Objection. This request seeks information that does not exist in the format requested and analysis that has not been and cannot be performed. Without waiving said objection, to the extent discoverable, the Company does not know. To do so, at a minimum, information contained on the monthly Duke Energy Kentucky PJM settlements statement associated with each similar category (transmission, energy, and capacity), as well as the consumed amount of fuel from the monthly accounting report would be needed to perform this calculation.

**PERSON RESPONSIBLE:** As to objection, Legal  
As to response, John Swez



**Duke Energy Kentucky**  
**Case No. 2024-00197**  
**KSES First Set Post Hearing Data Requests**  
**Date Received: December 21, 2024**

**KSES-PHDR-01-006**

**REQUEST:**

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.

**RESPONSE:**

Objection. This request is overbroad, unduly burdensome, and seeks information that is irrelevant to this proceeding and is not likely to lead to the discovery of any relevant or admissible evidence. The Company has not performed the requested analysis. Moreover, this request is objectionable as far as it seeks information that is publicly available. Without waiving said objection, and to the extent discoverable, the Company's filed cost of service study is publicly available on the Commission's website in Case No. 2022-00372. The cost-of-service study that supported the Company's application in that case is found in attachments JEZ-1 through JEZ-5 filed on December 1, 2022, and closely approximates the percentages for the currently approved revenue requirement.

**PERSON RESPONSIBLE:**

As to objection, Legal  
As to response, Sarah E. Lawler

**Duke Energy Kentucky**  
**Case No. 2024-00197**  
**KSES First Set Post Hearing Data Requests**  
**Date Received: December 21, 2024**

**CONFIDENTIAL KSES-PHDR-01-007**  
**(As to Attachment only)**

**REQUEST:**

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:

- 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

**RESPONSE:**

**CONFIDENTIAL PROPRIETARY TRADE SECRET (As to Attachment only)**

Please see KSES-PHDR-01-007 Confidential Attachment.

**PERSON RESPONSIBLE:** Tim Duff

**CONFIDENTIAL PROPRIETARY TRADE  
SECRET**

**KSES-PHDR-01-007  
CONFIDENTIAL ATTACHMENT**

**FILED UNDER SEAL**