

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 UNOPPOSED MOTION TO EXCUSE
AND CONSOLIDATE CERTAIN WITNESSES AND REQUEST FOR
EXPEDITED TREATMENT**

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) to excuse certain witnesses from participating in the December 10, 2024 hearing in the above-styled case, respectfully stating as follows:

Duke Energy Kentucky filed its 2024 Integrated Resource Plan (IRP) on June 21, 2024. The Sierra Club, Kentucky Solar Energy Society, Kentuckians for the Commonwealth, and Kentucky Resources Council (Joint Intervenors), and the Attorney General’s Office of Rate Intervention intervened in the case and discovery was completed in October of 2024. The Commission entered an Order on July 16, 2024, that scheduled a hearing for December 10, 2024, at the Commission’s offices in Frankfort, Kentucky.

Due to the unique nature of an IRP proceeding, no written testimony has been filed in this case. However, twenty-seven (27) separate individuals provided responses to data requests in the discovery phase of the case. Six (6) of these witness responded to two (2) or fewer questions. It is anticipated, given the issues those six witnesses addressed, they would likely receive little if any cross examination. Additionally, for other

witnesses, the Company is attempting to consolidate responses among witnesses as reasonably possible to allow for meaningful cross examination. It is anticipated that the witnesses identified below as appearing will be able to adopt the responses of the majority of witnesses the Company seeks to excuse.

Approximately sixty percent (60%) of the witnesses who provided data request responses work either in Charlotte, North Carolina or Plainfield, Indiana. For the witnesses traveling from Charlotte to appear at the hearing necessitates airfare, overnight accommodations for at least one night depending upon the length of the hearing, and vehicle rentals. The interests of having an efficient evidentiary hearing, and the cost-effective use of Company, Commission, and intervening party resources support excusing as many of the witnesses as reasonably possible. And as has been the prior practice of the Commission, in the event a witness in attendance is unable to respond to a specific question, post hearing data requests are a reasonable alternative and the Company would agree to such a process here.

Most of the Company's responses to data requests were answered by the following twelve (12) witnesses who the Company plans to appear in person for the hearing:

- 1) Mr. Matthew Kalemba, VP Integrated Resource Planning;¹
- 2) Mr. John Swez, Managing Director of Trading & Dispatch;²
- 3) Mr. Matt Ruscio, Director Renewables Development;
- 4) Mr. Daniel Sympson, Generation and Regulatory Strategy Director;

¹ Mr. Kalemba will also be adopting the responses of Tyler Cook, Matthew Peterson, Jennifer Poppler, Philip Beard, Paige Swofford, and Karen Hall, which eliminates the need for them to appear as witnesses.

² Mr. Swez will also be adopting the responses of Bryan Garnett and Alan Mok, which eliminates the need for them to appear as witnesses.

- 5) Mr. Ibrar Khera, Lead Load Forecasting Analyst;
- 6) Ms. Kimberly Hughes, Director, Coal Origination;
- 7) Mr. Michael Geers, Manager Environmental Services;
- 8) Mr. Jim McClay, Managing Director Natural Gas Trading;
- 9) Mr. Chad Donner, Principal Engineer;
- 10) Mr. Ryan Trogstad, Sr. Data Science Consultant;
- 11) Mr. Tim Duff, General Manager, Customer Solutions Regulatory Enablement; and
- 12) Ms. Sarah Lawler, VP of Rates and Regulatory Strategy for Kentucky & Ohio.³

Due to the paucity of many of the remaining witnesses' sponsorship of data request responses and the significant time and expense associated with travelling from out of state, administrative efficiency and prudence suggests that the remaining witnesses should be excused from participating in the hearing rather than be required to appear in person and likely not be the subject of significant, or any, cross-examination. This is particularly true in instances where the responses to data requests can be adopted by other witnesses who will be present. Considering the foregoing, Duke Energy Kentucky moves the Commission to excuse the below identified witnesses from appearing in person at the hearing. Where possible and as indicated, other witnesses will adopt their data request responses as follows:

- 1) Mr. Tyler Cook, Engineer III (13 Responses);⁴

³ Ms. Lawler will also be adopting the single response of Bruce Sailors, which eliminates the need for him to appear as a witness.

⁴ Matthew Kalembe will adopt Mr. Cook's responses.

- 2) Mr. Matthew Peterson, Lead Planning Analyst (4 Responses);⁵
- 3) Ms. Jennifer Poppler, Manager, IRP Modeling and Analytics (5 Responses);⁶
- 4) Mr. Bryan Garnett, RTO Policy and Compliance Manager (6 Responses);⁷
- 5) Mr. Phillip Beard, Lead Planning Analyst (1 Response);⁸
- 6) Ms. Paige Swofford, Principal Strategy and Planning Manager (2 Responses);⁹
- 7) Mr. Jacob Colley, Director, Customer Regulatory Planning, Support, and Compliance (1 Response);
- 8) Mr. Alan Mok, Financial Market Manager - MW (2 Responses);¹⁰
- 9) Mr. Jeff Turner, Principal Engineer (1 Response);
- 10) Mr. Bill Hehman, Manager Large Account Management (1 Response);
- 11) Mr. Nick Melillo, Director Asset Management (2 Responses);
- 12) Ms. Karen Hall, Resource Planning Regulatory and Strategy Director (1 Response);¹¹
- 13) Mr. Robert Ries, Manager Field Metering (1 Response);
- 14) Mr. Bruce Sailors, Director, Rate Administration (1 Response);¹²
- 15) Mr. Mitch Carmosino, General Manager, Accounts Receivable (1 Response).

⁵ Matthew Kalembe will adopt Mr. Peterson's responses.

⁶ Matthew Kalembe will adopt Ms. Poppler's responses.

⁷ John Swez will adopt Mr. Garnett's responses.

⁸ Matthew Kalembe will adopt Mr. Beard's response.

⁹ Matthew Kalembe will adopt Ms. Swofford's responses.

¹⁰ John Swez will adopt Mr. Mok's responses.

¹¹ Matthew Kalembe will adopt Ms. Hall's response.

¹² Sarah Lawler will adopt Mr. Sailors' response.

The responses of Mr. Cook, Mr. Peterson, Ms. Poppler, Mr. Garnett, Mr. Beard, Mr. Mok, Ms. Hall, and Mr. Sailors will be adopted by other Company witnesses. Should the Commission or any party have questions for Mr. Colley, Mr. Turner, Mr. Hehman, Mr. Melillo, Mr. Ries, or Mr. Carmosino, the Company proposes to address those questions through post hearing data responses. Granting the motion will save considerable expense for the Company without impairing the ability of the Commission, Staff, the AG, the Joint Intervenors, or the Sierra Club to engage in meaningful cross-examination of the witnesses.

The Company has approached Intervening Parties with this request and proposal and did not receive any objection, providing parties had the opportunity to submit post hearing data requests if a cross-examination question could not be answered and was deferred to a non-present witness. Due to the approaching December 10th hearing date, and the Commission's directive that the Company supply its proposed witness list seven days prior to the hearing, Duke Energy Kentucky respectfully requests expedited treatment of its Motion.

WHEREFORE, Duke Energy Kentucky, Inc. respectfully requests the Commission to excuse certain witnesses from participating in the December 10, 2024, hearing in the above-styled case.

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 November 26, 2024; 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.¹³

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

¹³*In the Matter of Electronic Emergency Docket Related to the Novel Coronavirus COVID-19*, Order, Case No. 2020-00085 (Ky. PSC July 22, 2021).