

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC 2024 INTEGRATED RESOURCE PLAN) Case No.
OF DUKE ENERGY KENTUCKY, INC.) 2024-00197

ATTORNEY GENERAL’S SUPPLEMENTAL DATA REQUESTS

The intervenor, the Attorney General of the Commonwealth of Kentucky, through his Office of Rate Intervention [“OAG”], hereby submits the following Supplemental Data Requests to Duke Energy Kentucky, Inc. [“DEK” or “the Company”], to be answered by the date specified in the Commission’s Orders of Procedure, and in accord with the following:

- (1) In each case where a request seeks data provided in response to a staff request, reference to the appropriate request item will be deemed a satisfactory response.
- (2) Identify the witness who will be prepared to answer questions concerning each request.
- (3) Repeat the question to which each response is intended to refer. The OAG can provide counsel for DEK with an electronic version of these questions in native format, upon request.
- (4) These requests shall be deemed continuing so as to require further and supplemental responses if the Companies receive or generate additional information within the scope of these requests between the time of the response and the time of any hearing conducted hereon.
- (5) Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association, be accompanied by a signed certification of the preparer or person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person’s knowledge, information, and belief formed after a reasonable inquiry.

(6) If you believe any request appears confusing, request clarification directly from Counsel for OAG.

(7) To the extent that the specific document, workpaper or information as requested does not exist, but a similar document, workpaper or information does exist, provide the similar document, workpaper, or information.

(8) To the extent that any request may be answered by way of a computer printout, identify each variable contained in the printout which would not be self-evident to a person not familiar with the printout.

(9) If the Companies have objections to any request on the grounds that the requested information is proprietary in nature, or for any other reason, notify OAG as soon as possible.

(10) As used herein, the words “document” or “documents” are to be construed broadly and shall mean the original of the same (and all non-identical copies or drafts thereof) and if the original is not available, the best copy available. These terms shall include all information recorded in any written, graphic or other tangible form and shall include, without limiting the generality of the foregoing, all reports; memoranda; books or notebooks; written or recorded statements, interviews, affidavits and depositions; all letters or correspondence; telegrams, cables and telex messages; contracts, leases, insurance policies or other agreements; warnings and caution/hazard notices or labels; mechanical and electronic recordings and all information so stored, or transcripts of such recordings; calendars, appointment books, schedules, agendas and diary entries; notes or memoranda of conversations (telephonic or otherwise), meetings or conferences; legal pleadings and transcripts of legal proceedings; maps, models, charts, diagrams, graphs and other demonstrative materials; financial statements, annual reports, balance sheets and other accounting records; quotations or offers;

bulletins, newsletters, pamphlets, brochures and all other similar publications; summaries or compilations of data; deeds, titles, or other instruments of ownership; blueprints and specifications; manuals, guidelines, regulations, procedures, policies and instructional materials of any type; photographs or pictures, film, microfilm and microfiche; videotapes; articles; announcements and notices of any type; surveys, studies, evaluations, tests and all research and development (R&D) materials; newspaper clippings and press releases; time cards, employee schedules or rosters, and other payroll records; cancelled checks, invoices, bills and receipts; and writings of any kind and all other tangible things upon which any handwriting, typing, printing, drawings, representations, graphic matter, magnetic or electrical impulses, or other forms of communication are recorded or produced, including audio and video recordings, computer stored information (whether or not in printout form), computer-readable media or other electronically maintained or transmitted information regardless of the media or format in which they are stored, and all other rough drafts, revised drafts (including all handwritten notes or other marks on the same) and copies of documents as hereinbefore defined by whatever means made.

(11) For any document withheld on the basis of privilege, state the following: date; author; addressee; indicated or blind copies; all persons to whom distributed, shown, or explained; and, the nature and legal basis for the privilege asserted.

(12) In the event any document called for has been destroyed or transferred beyond the control of the Companies, state: the identity of the person by whom it was destroyed or transferred, and the person authorizing the destruction or transfer; the time, place, and method of destruction or transfer; and, the reason(s) for its destruction or transfer. If destroyed or disposed of by operation of a retention policy, state the retention policy.

(13) Provide written responses, together with any and all exhibits pertaining thereto, in one or more bound electronic volumes, separately indexed and tabbed by each response, in compliance with Kentucky Public Service Commission Regulations and Orders.

(14) “And” and “or” should be considered to be both conjunctive and disjunctive, unless specifically stated otherwise.

(15) “Each” and “any” should be considered to be both singular and plural, unless specifically stated otherwise.

Respectfully submitted,

RUSSELL COLEMAN
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Certificate of Service

Pursuant to the Commission's Orders in Case No. 2020-00085, and in accord with all other applicable law, Counsel certifies that an electronic copy of the forgoing was served and filed by e-mail to the parties of record.

This 25th day of September, 2024



Assistant Attorney General

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1. Provide the equivalent availability factor of the East Bend plant for each of the past five (5) calendar years.
2. Explain whether the proposed DFO conversion of East Bend is projected to have an impact on the plant's equivalent availability factor. Provide any relevant data, or if in the IRP, identify its exact location.
3. Explain by what metric(s) DEK tracks the rate at which PJM dispatches the East Bend plant, i.e., whether on an hourly, daily or weekly basis.
 - a. Provide the total number of hours PJM dispatched the East Bend plant for each of the years 2019-2023, and for 2024 to date.
 - b. Explain whether DEK ever self-dispatches East Bend. If so: (i) provide the number of hours of self-dispatch for the same time frame identified in subpart (a.) of this question; and (ii) explain whether DEK receives any payments from PJM of any type in a self-dispatch scenario, and if so in what PJM market (e.g., energy, day-ahead, etc.).
4. Reference the response to AG-DR-1-1 (a). Confirm that under the 100% natural gas conversion case, the Company would have to rely on PJM market power to a greater extent than in the DFO case.
 - a. Can the Company confirm that prices for PJM market power are expected to increase during the planning period? If so confirmed, explain whether the IRP provides a price projection. If it does not contain such a projection, please provide one.
5. Explain whether DEK's PJM reliability requirement has changed from 2020 through the most recent PJM auction results.
 - a. Explain whether the reliability requirements vary for FRR as opposed to RPM members, and if so: (i) what the requirements are; and (ii) how they will or could affect DEK's portfolio.
6. Provide a discussion regarding whether the DEOK zone of PJM has a sufficient level of Capacity Emergency Transfer Limit (CETL) to enable DEOK's transmission system to import capacity under peak load emergency conditions.
7. Provide a discussion regarding whether the DEOK zone, at any time during the planning period, is projected to have a need for energy imports to meet its reliability criteria. If this metric is provided in the Capacity Emergency Transfer Objective

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(CETO) applicable to the DEOK zone, please provide that metric as projected for each year of the planning period.

8. Reference the response to AG-DR-1-14 (a)(ii). Provide a discussion on why the lead time for a new CC plant has increased to eight (8) years. Include in your discussion how this impacts DEK's planning processes.
9. Reference the response to AG-DR-1-15. Regarding the sentence, "That equates to nearly 7% of peak demand being met by distributed resources," confirm that this refers exclusively to company-owned DSM and EE resources.
 - a. Does the Company have, or is it aware of any estimates of the amount of customer-owned solar and/or other generation types (sometimes referred to as "behind the meter resources") interconnected to the Company's distribution grid (both currently and projected future)? If so, please provide same.
10. Reference the response to AG-DR-1-40. Regarding the responses to subparts (c) and (d), explain why no challenges were filed to the EPA's ELG and MATS rules identified therein.
11. Provide a discussion regarding the extent (if any) to which: (i) affordability of rates; and (ii) system reliability, were considered and modelled in the IRP planning process, in particular to resource selection.
 - a. Include in your response whether any of the computer programs DEK utilized in the preparation of this IRP also model the reliability of DEK's system under the various cases and scenarios the Company examined. If reliability modeling results are included in the IRP, please identify where.
12. Does the Company agree that prudent utility practice dictates that it should study and manage its load commitments? If so, and in the further event that any data centers or cryptocurrency businesses should seek to locate within DEK's service territory, explain whether the Company would be willing to adopt tariffs similar to those proposed by AEP Ohio ¹ in which the proposed new businesses would be required to: (i) commit to service contracts of a certain length of time, with an option to pay exit fees after five years; and (ii) pay minimum demand charges based on 90% of their contract capacity. If these particular terms would not be acceptable to the Company, please provide alternative terms it believes may be more acceptable.

¹ See, e.g., <https://www.utilitydive.com/news/aep-ohio-data-center-crypto-rates-puc/716150/>

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13. Explain to what extent, if any, the IRP modeling included the capital and O&M costs of the proposed WFGD conversion in CPCN docket 2024-00152.²
14. Provide a discussion regarding how the potential outcomes in docket no. 2024-00258³ could affect the modelling used in the IRP docket.

² *In Re:* Electronic Application Of Duke Energy Kentucky, Inc. For A Certificate Of Public Convenience And Necessity To Convert Its Wet Flue Gas Desulfurization System From A Quicklime Reagent Process To A Limestone Reagent Handling System At Its East Bend Generating Station And For Approval To Amend Its Environmental Compliance Plan For Recovery By Environmental Surcharge Mechanism.

³ *In Re:* 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.