

KyPSC Case No. 2024-00285
TABLE OF CONTENTS

<u>DATA REQUEST</u>	<u>WITNESS</u>	<u>TAB NO.</u>
STAFF-DR-02-001	John Swez	1
STAFF-DR-02-002	John Swez	2
STAFF-DR-02-003	John Swez	3
STAFF-DR-02-004	John Swez	4
STAFF-DR-02-005	John Swez	5

Duke Energy Kentucky
Case No. 2024-00285
STAFF Second Set of Data Requests
Date Received: November 1, 2024

STAFF-DR-02-001

REQUEST:

Refer to John Swez Direct Testimony at 36. State whether Duke Kentucky is currently in negotiations or communication with any potential large industrial customers, including but not limited to a data center or large factory, planning to locate within its service territory.

RESPONSE:

As stated in testimony, although the Company routinely engages in economic development conversations with potential new customer load, no recent significant additions have been announced for the Company's Kentucky service territory.

However, the Company did submit an "Approach to Large Load Adjustments" presentation during the October 25, 2024 PJM meeting in the link below:

<https://www.pjm.com/-/media/committees-groups/subcommittees/las/2024/20241025/20241025-item-03e---duke-large-load-request.ashx>

Note that referring to page 4, the Warehousing load is within the Company's Kentucky service territory while the Food Processing and Metal / Steel large load additions are within the Duke Energy Ohio service territory.

PERSON RESPONSIBLE: John Swez
Alan Mok

Duke Energy Kentucky
Case No. 2024-00285
STAFF Second Set of Data Requests
Date Received: November 1, 2024

STAFF-DR-02-002

REQUEST:

Refer to Duke Kentucky’s response to Commission Staff’s First Request for Information (Staff’s First Request), Item 1. Provide what the PJM reserve requirement for RPM participants for each of the past five years.

RESPONSE:

The “PJM reserve requirement for RPM participants” is assumed to mean the Installed Reserve Margin (IRM), or the reserves above the forecasted peak demand necessary to meet a 1 day in 10 years Loss of Load Expectation (LOLE). Note that this is not the resulting reserve margin of the RPM after the auction has cleared.

The IRM for the past five years is:

	2021/2022 3rd IA	2022/2023 3rd IA	2023/2024 3rd IA	2024/2025 3rd IA	2025/2026 BRA
Installed Reserve Margin (IRM)	14.70%	14.90%	14.9%	17.70%	17.80%

PERSON RESPONSIBLE:

John Swez
Alan Mok

Duke Energy Kentucky
Case No. 2024-00285
STAFF Second Set of Data Requests
Date Received: November 1, 2024

PUBLIC STAFF-DR-02-003

REQUEST:

Refer to Duke Kentucky's response to Staff's First Request, Item 8.

- a. State how much excess capacity, if any, has Duke Kentucky sold into the RPM market each of the past five years. Include as part of the answer a detailed list of each sale and the amount of capacity sold.
- b. State how much excess capacity, if any, has Duke Kentucky sold to parties external to PJM or another FRR entity for each of the past five years. Include as part of the answer a detailed list of each sale and the amount of capacity sold.

RESPONSE:

CONFIDENTIAL PROPRIETARY TRADE SECRET

- a. Please see STAFF-DR-02-003 Confidential Attachment. The total capacity sales to PJM are [REDACTED]
- b. Please see STAFF-DR-02-003 Confidential Attachment, the Company did not make any sales to external parties outside of PJM or another FRR entities.

PERSON RESPONSIBLE: John Swez
 Alan Mok

**CONFIDENTIAL PROPRIETARY TRADE
SECRET**

**STAFF-DR-02-003
CONFIDENTIAL ATTACHMENT**

FILED UNDER SEAL

Duke Energy Kentucky
Case No. 2024-00285
STAFF Second Set of Data Requests
Date Received: November 1, 2024

STAFF-DR-02-004

REQUEST:

Refer to Duke Kentucky's response to the Attorney General's First Request for Information (Attorney General's First Request), Item 1, Attachment at 14 of 16. State whether any party with which Duke Kentucky has, or had, a firm unit specific bilateral contract has experienced capacity performance issues resulting in Duke Kentucky to have a capacity shortfall. Provide a detailed explanation of each incident.

RESPONSE:

Duke Energy Kentucky has not had any capacity performance issues nor capacity shortfall resulting from a firm unit specific bilateral contract.

PERSON RESPONSIBLE: John Swez
 Alan Mok

Duke Energy Kentucky
Case No. 2024-00285
STAFF Second Set of Data Requests
Date Received: November 1, 2024

STAFF-DR-02-005

REQUEST:

Refer to Duke Kentucky's response to the Attorney General's First Request, Item 1e. Provide the previous analysis performed by Duke Kentucky, or any summaries or analyses, in which Duke Kentucky determined to remain in the FRR.

RESPONSE:

The reference of "the previous analysis" in the response to AG-DR-01-001, part (e), refers to the analysis that was included in the response as AG-DR-01-001(e) Attachment. Thus, the previous analysis was already included in that response. Please see AG-DR-01-001(e) Attachment for the previous analysis performed by Duke Energy Kentucky.

PERSON RESPONSIBLE: John Swez