

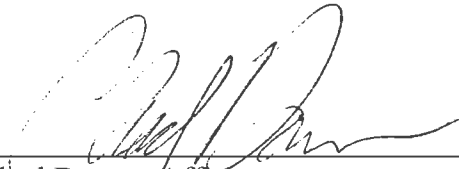
KyPSC Case No. 2025-00002
TABLE OF CONTENTS

<u>DATA REQUEST</u>	<u>WITNESS</u>	<u>TAB NO.</u>
STAFF-DR-01-001	Julie Walters.....	1
STAFF-DR-01-002	Chad Donner	2
STAFF-DR-01-003	Chad Donner Sarah E. Lawler.....	3
STAFF-DR-01-004	Sarah E. Lawler.....	4
STAFF-DR-01-005	Julie Walters.....	5
STAFF-DR-01-006	Julie Walters.....	6

VERIFICATION

STATE OF OHIO)
) SS:
COUNTY OF HAMILTON)

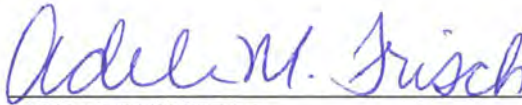
The undersigned, Chad Donner, Principal Engineer, being duly sworn, deposes and says that he has personal knowledge of the matters set forth in the foregoing data requests, and that the answers contained therein are true and correct to the best of his knowledge, information and belief.



Chad Donner Affiant

Subscribed and sworn to before me by Chad Donner on this 21st day of February, 2025.





NOTARY PUBLIC

My Commission Expires: 1/5/2029

VERIFICATION

STATE OF INDIANA

)

SS:

)

COUNTY OF

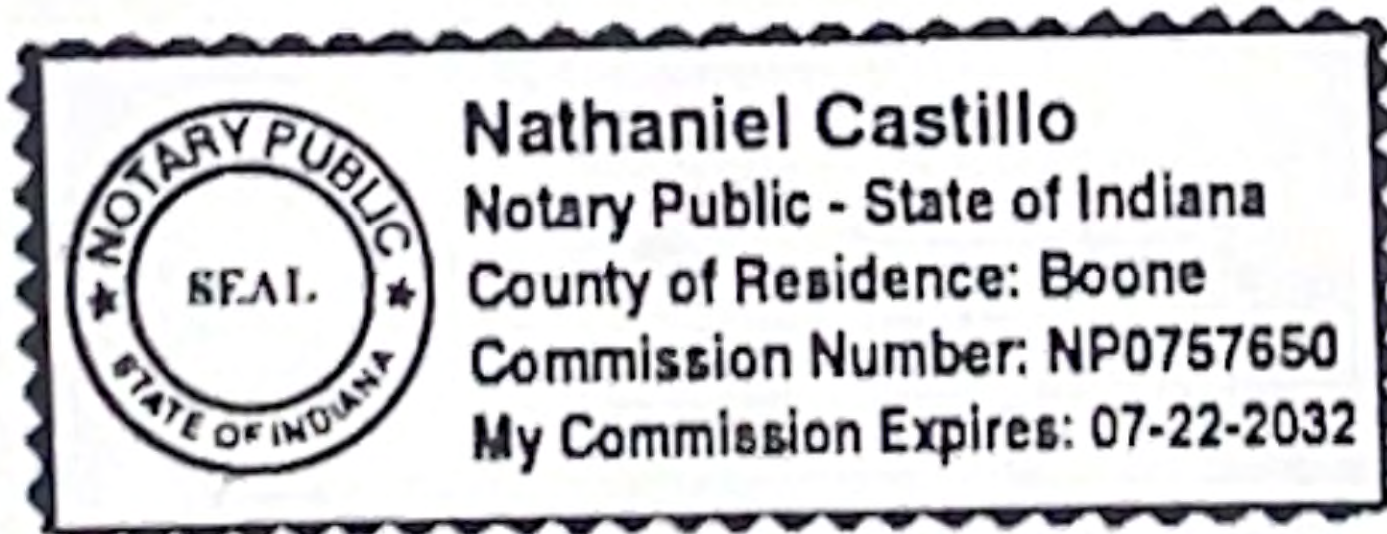
)

The undersigned, Julie Walters, Senior EHS Consultant, being duly sworn, deposes and says that she has personal knowledge of the matters set forth in the foregoing data requests, and that the answers contained therein are true and correct to the best of her knowledge, information and belief.

Julie Walters
Julie Walters, Affiant

Subscribed and sworn to before me by Julie Walters on this 21st day of February, 2025.

Nathaniel Castillo
NOTARY PUBLIC




My Commission Expires:

07-22-2032

VERIFICATION

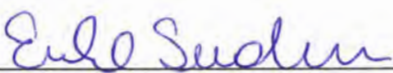
STATE OF OHIO)
)
COUNTY OF HAMILTON) SS:

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 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 21st day of February, 2025.



NOTARY PUBLIC

My Commission Expires: July 8, 2027



EMILIE SUNDERMAN
Notary Public
State of Ohio
My Comm. Expires
July 8, 2027

Duke Energy Kentucky
Case No. 2025-00002
STAFF First Set Data Requests
Date Received: February 13, 2025

STAFF-DR-01-001

REQUEST:

Explain whether any recent executive orders issued on or after January 20, 2025, affect any proposals in the application. If so, identify the orders and explain the impact.

RESPONSE:

Following the Administration change on January 20, 2025, there have been a number of Executive Orders issued. Some of the documents provide a temporary pause on the regulatory process to allow the incoming Administration an opportunity to review pending actions and provide input on the next steps. Many of these actions are temporary in nature and an Executive Order cannot undo any final action that has gone through the regulatory process. There are no Executive Orders that directly impact the proposed project, rather the actions serve to frame the longer-term goals of the Administration, some of which may directly impact environmental regulations, while others aim to shape the future of the electric industry. The issuance of Executive Orders following an Administration change is a routine process, until the regulations are updated, Duke Energy Kentucky continues to comply with the permits issued to our operating plants.

PERSON RESPONSIBLE: Julie L. Walters

Duke Energy Kentucky
Case No. 2025-00002
STAFF First Set Data Requests
Date Received: February 13, 2025

STAFF-DR-01-002

REQUEST:

Provide a generalized list of all changes in pricing, return on equity, and planning that deviate from the previous filing in Case No. 2024-00152.¹

RESPONSE:

The cost estimate for the limestone conversion project remains unchanged from the “SUPPLEMENTAL Attachment CMD-1 EB Limestone Conversion Cost Estimate” that was provided as part of the Supplemental Testimony in Case No. 2024-00152. From a planning perspective, as a result of resubmitting the CPCN filing the project in-service date has moved from December 2026 to Spring 2027 ahead of the July 2027 MATs compliance date.

PERSON RESPONSIBLE: Chad Donner

¹ Case No. 2024-00152, *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* (filed July 25, 2024).

Duke Energy Kentucky
Case No. 2025-00002
STAFF First Set Data Requests
Date Received: February 13, 2025

STAFF-DR-01-003

REQUEST:

Refer to the Application generally. Compare the application and testimony in the current proceeding with the case record in Case No. 2024-00152, and explain and identify any updates or changes that have been made.

RESPONSE:

To summarize updates in the current application to the record in Case No. 2024-00152, the primary differences are listed below-

- Updates to the project scope and design details were provided based on the further progression of engineering performed to date.
- Further explanation of the project co-benefits for MATs compliance due to the timing of the initial application submittal and finalization of the updated MATs rule.
- Delay of the project in-service date from December of 2026 to Spring 2027 ahead of the July MATs compliance deadline.
- Updated the EAB Cost Benefits Modeling analysis to reflect the delay in the project in-service date from the initial limestone operation start date of 1/1/2027 to 6/1/2027.
- Updated the Estimated Revenue Requirement for ESM and Typical Bill Comparisons to reflect the delay in the project in-service date from the initial limestone operation start date of 1/1/2027 to 6/1/2027 and the change in the

environmental reagent expense was also updated to include the actual environmental reagent expense for the 12 months ended October 2024 instead of 12 months ended May 2024.

PERSON RESPONSIBLE: Chad Donner
Sarah E. Lawler

Duke Energy Kentucky
Case No. 2025-00002
STAFF First Set Data Requests
Date Received: February 13, 2025

STAFF-DR-01-004

REQUEST:

Confirm that the requested return on equity is the same in this application as the application for a general rate adjustment.¹ If not confirmed, explain why not.

RESPONSE:

The calculations the Company used in computing the estimated revenue requirements in Attachment SEL-1 to the Direct Testimony of Company witness Sarah E. Lawler were made using the currently authorized ROE of 9.65% for the ESM. To be specific, Line 10, Page 1 of Attachment SEL-1 shows an ROR of 8.82%. The ROE component of that ROR is the currently authorized ROE of 9.65%.

The Company's intention is to always use whatever ROE is authorized by the Commission at the time it makes its ESM filings and would therefore use that which is approved for the ESM rider in the current base rate case proceeding (Case No. 2024-00354) once that case has been ordered upon.

PERSON RESPONSIBLE: Sarah E. Lawler

¹ Case No. 2024-00354, *Electronic Application of Duke Energy Kentucky, Inc. for: 1) An Adjustment of the Electric Rates; 2) Approval of New Tariffs; 3) Approval of Accounting Practices to Establish Regulatory Assets and Liabilities; and 4) All Other Required Approvals and Relief* (filed Dec. 2, 2024).

Duke Energy Kentucky
Case No. 2025-00002
STAFF First Set Data Requests
Date Received: February 13, 2025

STAFF-DR-01-005

REQUEST:

If Duke Kentucky's position is to roll back environmental protections,¹ explain the conflict between this application and these public statements.

RESPONSE:

There is no conflict. The letter that Duke Energy Kentucky signed as part of a coalition of companies focused on rules that have yet to be executed by the agency. The MATS regulation was not discussed in the public statement. Refer to the response to STAFF-DR-01-006. Duke Energy Kentucky must continue to comply with existing environmental regulations. The project proposed in this case will allow the Company to continue to comply with existing regulations and the new MATs regulation that has already gone into effect, with a compliance deadline of summer 2027.

PERSON RESPONSIBLE: Julie L. Walters

¹ Ohio energy companies ask EPA to roll back regulations on coal ash, greenhouse gases <https://www.msn.com/en-us/money/companies/ohio-energy-companies-ask-epa-to-roll-back-regulationson-coal-ash-greenhouse-gases/ar-AA1y9RnS?ocid=BingNewsSerp> (last visited 2/11/25).

**Duke Energy Kentucky
Case No. 2025-00002
STAFF First Set Data Requests
Date Received: February 13, 2025**

STAFF-DR-01-006

REQUEST:

If environmental protections are rolled back as requested in the cited article, provide Duke Kentucky's plan going forward in response to the decreased protections.

RESPONSE:

East Bend will still comply with their Title V air permit, NPDS water permit, and other existing federal and state regulations. Duke Energy Kentucky will continue to follow all applicable regulations and requirements.

PERSON RESPONSIBLE: Julie L. Walters