


**KyPSC Case No. 2025-00002**  
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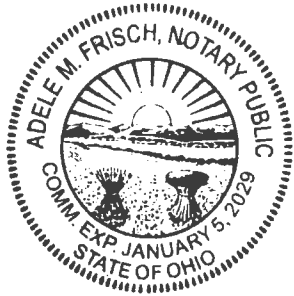
VERIFICATION

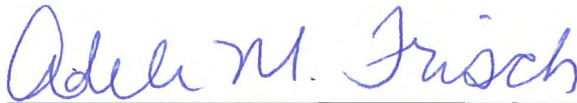
STATE OF OHIO                    )  
  )     SS:  
COUNTY OF HAMILTON        )

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 17<sup>TH</sup> day of MARCH,  
2025.



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

My Commission Expires: 1/5/2029

**Duke Energy Kentucky**  
**Case No. 2025-00002**  
**AG's First Set Data Requests**  
**Date Received: March 12, 2025**

**AG-DR-01-001**

**REQUEST:**

Reference the Company's response to Staff DR-1-1. Confirm the following:

- a. The cost estimate for the limestone conversion program remains unchanged from the estimate provided in the prior docket, 2024-00152.
- b. When completed, the limestone conversion project and attendant upgrades will give the Company the additional benefit of providing a compliance path for the new MATS standards for fine particulate matter.

**RESPONSE:**

- a. Confirmed – The cost estimate for the limestone conversion remains unchanged at a cost of \$125.8M.
- b. Confirmed – Many of the same upgrades required for the East Bend WFGD to enable conversion to limestone will also provide a MATs compliance co-benefit.

**PERSON RESPONSIBLE:**      Chad M. Donner

**Duke Energy Kentucky  
Case No. 2025-00002  
AG's First Set Data Requests  
Date Received: March 12, 2025**

**AG-DR-01-002**

**REQUEST:**

Explain whether the Company can confirm that, given that the proposed limestone conversion project obviates the need for additional capital and O&M expenditure to achieve compliance with the new MATS requirements, the cost-effectiveness of the proposed limestone conversion project is now greater than the Company's original estimate provided in the 2024-00152 docket.

**RESPONSE:**

While the proposed limestone conversion project alleviates the need for additional capital and O&M expenditure to achieve compliance with the new MATS requirements, there is no change to the cost-effectiveness of the proposed limestone conversion project from the original estimate provided in the 2024-00152 docket as the costs and benefits of achieving MATS compliance were sunk in the limestone conversion analysis.

**PERSON RESPONSIBLE:** Chad M. Donner