KyPSC Case No. 2025-00077 TABLE OF CONTENTS

DATA REQUEST	WITNESS	<u>TAB NO.</u>
STAFF-DR-02-001	Kimberly Hughes	1
STAFF-DR-02-002	Jim McClay	2
STAFF-DR-02-003	Kimberly Hughes Jim McClay	3
STAFF-DR-02-004	John D. Swez	4

VERIFICATION

STATE OF NORTH CAROLINA)	
)	SS:
COUNTY OF MECKLENBURG	1	

The undersigned, Kimberly A. Hughes, Director, Coal Origination, being duly sworn, deposes and says that she has personal knowledge of the matters set forth in the foregoing data request, and that the answers contained therein are true and correct to the best of her knowledge, information, and belief.

Kimberly A. Hughes, Affiant

Subscribed and sworn to before me by Kimberly A. Hughes on this 18 day of 2025.

NOTARY PUBLIC

My Commission Expires:

NOTARY & NOTARY & COMMINISTRATION OF STREET OF SOUR STREET OF SOUR

VERIFICATION

STATE OF NORTH CAROLINA)		
)		SS
COUNTY OF MECKLENBURG)	

The undersigned, James J. McClay, Managing Director Natural Gas, 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.

J. O west

Subscribed and sworn to before me by James J. McClay on this // day of July

2025.

My Commission Expires:

VERIFICATION

STATE OF NORTH CAROLINA)	
)	SS:
COUNTY OF MECKLENBURG)	

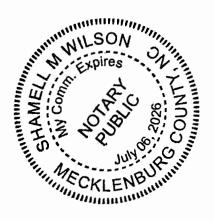
The undersigned, John D. Swez, Managing Director Trading & Dispatch, being duly sworn, deposes and says that he has personal knowledge of the matters set forth in the foregoing data requests and that the answers contained therein are true and correct to the best of his knowledge, information and belief.

John D. Swez, Affiant

Subscribed and sworn to before me by John D. Swez on this 15th day of July, 2025.

MOTARY PUBLIC

My Commission Expires:



STAFF's Second Request for Information

Date Received: July 3, 2025

STAFF-DR-02-001

REQUEST:

Refer to Duke Kentucky's Response to Commission Staff's First Request for Information

(Staff's First Request), Item 4, Attachment. For the 2027 and 2028 entries, provide the

reasons why coal was not purchased and explain whether "No Coal Purchased" means that

the coal was not suitable, the price was not suitable, the coal was not needed, or signifies

other reasons why no coal was purchased.

RESPONSE:

Duke Energy issued a request for coal proposals in April 2024 for the period covering

Calendar Years 2025 through 2028. Duke Energy Kentucky typically secures coal through

long-term contracts lasting one to three years to help manage projected coal consumption

variability. Following the April 2024 solicitation, Duke Energy Kentucky procured coal

for calendar years 2025 and 2026 in accordance with its procurement guidelines and chose

not to contract for coal beyond 2026 from this solicitation. This decision was based on the

company's focus on addressing the immediate needs for the next two years, rather than on

any particular shortcomings of the submitted coal offers. Duke Energy Kentucky plans to

continue using its competitive bidding process to procure coal for future needs within its

established procurement framework.

PERSON RESPONSIBLE:

Kimberly Hughes

STAFF's Second Request for Information

Date Received: July 3, 2025

STAFF-DR-02-002

REQUEST:

Refer to Duke Kentucky's Response to Staff's First Request, Item 6, Attachment. Explain

whether the Qty UOM column heading means quantity unit of measure such that on

November 1, 2023, Duke Kentucky purchased 20,000 MMBtus of natural gas. If not,

explain the meaning of columns Qty and Qty UOM.

RESPONSE:

Yes, the Qty UOM column heading means Quantity Unit of Measure.

PERSON RESPONSIBLE:

Jim McClay

STAFF's Second Request for Information

Date Received: July 3, 2025

STAFF-DR-02-003

REQUEST:

Refer to Duke Kentucky's Response to Staff's First Request, Item 9.

a. Explain the circumstances or conditions that would prompt Duke Kentucky

to audit its coal and coal transportation contracts.

b. Provide the date of the most recent audit of coal and coal transportation

contracts and explain, in detail, the reasons that prompted the audit.

c. Explain the circumstances or conditions that would prompt Duke Kentucky

to audit its fuel and transportation contracts.

d. Provide the date of the most recent audit of fuel and transportation contracts

and explain, in detail, the reasons that prompted the audit.

RESPONSE:

a. Duke Energy Kentucky has not conducted an audit on either coal or

transportation agreements. Such an audit would be precipitated by a coal supplier or

transportation carrier not adhering to the terms and conditions of the respective agreements.

Duke Energy Kentucky suppliers and carriers have been performing under the terms and

conditions of their agreements deeming an audit unnecessary. Duke Energy's Internal

Corporate Audit Services' annual audit planning process takes a risk-based approach in

determining the annual internal audit plan. In general, audits of this nature would be

considered for execution on a rotational basis of every 5 to 7 years. However, if there are

risks identified as part of the annual review process related to contracts Corporate Audit

Services would consider execution of an audit outside of this timeframe.

b. Corporate Audit Services performed an audit of Fuels Procurement and

Contract Administration (audit # 120018). The report was issued on June 17, 2020. The

audit was performed on a rotational basis as described in part (a) above.

c. Duke Energy Kentucky has not conducted an audit on either fuel or

transportation agreements. Such an audit would be precipitated by a fuel supplier or

transportation providers not adhering to the terms and conditions of the respective

agreements. Duke Energy Kentucky fuel suppliers and transportation providers have been

performing under the terms and conditions of their agreements, deeming an audit

unnecessary.

Duke Energy's Internal Corporate Audit Services' annual audit planning process

takes a risk-based approach in determining the annual internal audit plan. In general, audits

of this nature would be considered for execution on a rotational basis of every 5 to 7 years.

However, if there are risks identified as part of the annual review process related to

contracts Corporate Audit Services would consider execution of an audit outside of this

timeframe.

d. Corporate Audit Services performed an audit of Natural Gas Procurement

and Contract Administration (audit #121040). The report was issued on April 27, 2021.

The audit was performed on a rotational basis as described in part (c) above.

PERSON RESPONSIBLE:

Kimberly Hughes

Jim McClay

STAFF's Second Request for Information

Date Received: July 3, 2025

STAFF-DR-02-004

REQUEST:

Refer to Duke Kentucky's Response to Staff's First Request, Item 17. Provide explanations

for Woodsdale units with negative or very low net capacity factors in certain months, such

as Unit 1 in March 2024.

RESPONSE:

For the purpose of this response, Duke Energy Kentucky defined "very low" net capacity

factors to be less than 1%.

• Woodsdale Unit 1 for January 2024 had a Net Capacity Factor of 0.50%, primarily

due to the unit being placed in reserve shutdown status for 716 of the 744 available

period hours.

• Woodsdale Unit 1 for March 2024 had a Net Capacity Factor of -0.16%, primarily

due to the unit being in a planned outage for the duration of the month and utilizing

small amounts of auxiliary load while off-line, resulting in net negative generation.

• Woodsdale Unit 1 for April 2024 had a Net Capacity Factor of -0.16%, primarily

due to the unit being in a planned outage for the duration of the month and utilizing

auxiliary load while off-line, resulting in net negative generation.

PERSON RESPONSIBLE:

John D. Swez