# **KyPSC Case No. 2025-00237 TABLE OF CONTENTS**

DATA REQUEST	<u>WITNESS</u>	TAB NO.
STAFF-DR-02-001	Libbie S. Miller	1
STAFF-DR-02-002	Libbie S. Miller	2
STAFF-DR-02-003	Libbie S. Miller	3
STAFF-DR-02-004	Libbie S. Miller	4

### **VERIFICATION**

STATE OF OHIO	)	
	)	SS:
COUNTY OF HAMILTON	)	

The undersigned, Libbie S. Miller, Rates & Regulatory Strategy Manager, 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.

ibbie S. Miller, Affiant

Subscribed and sworn to before me by Libbie S. Miller on this 2000 day of November, 2025.

NOTARY PUBLIC

My Commission Expires: July 8, 2027



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

STAFF Second Request for Information

Date Received: November 13, 2025

**STAFF-DR-02-001** 

#### **REQUEST:**

Refer to Duke Kentucky's monthly Environmental Surcharge (ES) filing for the Expense Month of December 2024, ES Form 2.00, Line No. 26 and ES Form 3.00. The Jurisdictional E(m) Revenue Recovered in Current Expense Month is reported here as (\$247,981), but this amount is inconsistent with the amounts that should be carried forward from ES Form 3.00, equal to \$3,507,957, arising from the sum of the Residential revenue of \$2,390,101 plus the Non-Residential revenue of \$1,117,856 reported in December. Reconcile the differences and correct any forms, including all affected values and future months. Update the over/under calculation, if affected.

		Dec-24
Res.	ES	2,390,101
Non-Res.	ES	1,117,856
	Total Revenues	3,507,957

#### **RESPONSE:**

The purpose of Form 3.00 is to calculate the residential and non-residential portions of Duke Energy Kentucky's total revenue for the most recent twelve months for use in allocating the Total Adjusted Net Jurisdictional E(m) on Form 1.10, Line 13, between residential and non-residential customers. The total revenue on Form 3.00, Column 2, includes base revenues and all electric rider revenues. Form 3.00, Column 5 includes the revenues related to Environmental Surcharge Mechanism rolled into base rates in Case No.

1

2023-00374 and the revenues collected through the Environmental Surcharge Mechanism Rider. All revenues, base and rider, related to the Environmental Surcharge Mechanism should be removed for the allocation of jurisdictional revenues to residential and non-residential customers.

The calculation on Form 2.00, Lines 24-27, calculates the (over)/under recovery for the Environmental Surcharge Mechanism Rider only; therefore, the Jurisdictional E(m) Revenue Recovered in Current Expense Month on Form 2.00, Line 26, is the revenue charged or credited to the customers through Environmental Surcharge Mechanism Rider only.

Please see the table below for the breakout of the ESM revenues on Form 3.00, Column 5, between base revenues and rider revenues for December 2024.

	<u>Base</u>	<u>Rider</u>	<u>Total</u>	
December 2024	Revenues	Revenues	Revenues	
Residential	\$2,559,060	(\$168,959)	\$2,390,101	(b)
Non-Residential	\$1,196,878	(\$79,022)	\$1,117,856	(b)
	\$3,755,938	(\$247,981)	\$3,507,957	(b)

<sup>(</sup>a) Per Form 2.00, Line 26

Based on the explanation above, the (over)/under recovery calculation was not affected and does not need to be updated.

The Company will update Form 3.00 going forward to break out the Environmental Surcharge Revenues into the amounts included in base revenues and the rider revenues for transparency the same way fuel revenues are presented in the non-residential section of Form 3.00, Columns 3 and 4.

<sup>(</sup>b) Per Form 3.00, Column 5

STAFF Second Request for Information

Date Received: November 13, 2025

**STAFF-DR-02-002** 

**REQUEST:** 

Refer to Duke Kentucky's monthly ES filing for the Expense Month of January 2025, ES

Form 2.00, Line No. 26 and ES Form 3.00. The Jurisdictional E(m) Revenue Recovered in

Current Expense Month is reported here as \$1,313,793, but this amount is inconsistent with

the amounts that should be carried forward from ES Form 3.00, equal to \$3,191,762, arising

from the sum of Residential revenue of \$1,705,867 plus the Non-Residential revenue of

\$1,485,895 reported in January. Reconcile the differences and correct the forms and all

other affected values. Update the over/under calculation, if affected.

**Res.** ES 1,705,867

Non-Res. ES 1,485,895

Total Revenues 3,191,762

**RESPONSE:** 

The purpose of Form 3.00 is to calculate the residential and non-residential portions of

Duke Energy Kentucky's total revenue for the most recent twelve months for use in

allocating the Total Adjusted Net Jurisdictional E(m) on Form 1.10, Line 13, between

residential and non-residential customers. The total revenue on Form 3.00, Column 2,

includes base revenues and all electric rider revenues. Form 3.00, Column 5 includes the

revenues related to Environmental Surcharge Mechanism rolled into base rates in Case No.

2023-00374 and the revenues collected through the Environmental Surcharge Mechanism

Rider. All revenues, base and rider, related to the Environmental Surcharge Mechanism

1

should be removed for the allocation of jurisdictional revenues to residential and non-residential customers.

The calculation on Form 2.00, Lines 24-27, calculates the (over)/under recovery for the Environmental Surcharge Mechanism Rider only; therefore, the Jurisdictional E(m) Revenue Recovered in Current Expense Month on Form 2.00, Line 26, is the revenue charged or credited to the customers through Environmental Surcharge Mechanism Rider only.

Please see the table below for the breakout of the ESM revenues on Form 3.00, Column 5, between base revenues and rider revenues for January 2025.

	<u>Base</u>	<u>Rider</u>	<u>Total</u>
January 2025	<u>Revenues</u>	<u>Revenues</u>	<u>Revenues</u>
Residential	\$1,003,698	\$702,169	\$1,705,867 <sup>(b)</sup>
Non-Residential	\$874,271	\$611,624	\$1,485,895 (b)
	\$1,877,969	\$1,313,793 (a)	\$3,191,762 (b)

<sup>(</sup>a) Per Form 2.00, Line 26

Based on the explanation above, the (over)/under recovery calculation was not affected and does not need to be updated.

The Company will update Form 3.00 going forward to break out the Environmental Surcharge Revenues into the amounts included in base revenues and the rider revenues for transparency the same way fuel revenues are presented in the non-residential section of Form 3.00, Columns 3 and 4.

<sup>(</sup>b) Per Form 3.00, Column 5

STAFF Second Request for Information

Date Received: November 13, 2025

**STAFF-DR-02-003** 

**REQUEST:** 

Refer to ES Form 2.00, for the Expense Month of February 2025, Line No. 26 and ES

Form3.00. The Jurisdictional E(m) Revenue Recovered in Current Expense Month is

reported here as \$2,068,861, but this amount is inconsistent with the amounts that should

be carried forward from ES Form 3.00, equal to \$3,946,831, arising from the sum of

Residential revenue of \$1,941,534 plus the Non-residential revenue of \$2,005,297 reported

in February. Reconcile the differences and correct the forms and all other affected values.

Update the over/under calculation, if affected.

Feb-25

**Res.** ES 1.941.534

Non-Res. ES 2,005,297

**RESPONSE:** 

The purpose of Form 3.00 is to calculate the residential and non-residential portions of

Duke Energy Kentucky's total revenue for the most recent twelve months for use in

allocating the Total Adjusted Net Jurisdictional E(m) on Form 1.10, Line 13, between

residential and non-residential customers. The total revenue on Form 3.00, Column 2,

includes base revenues and all electric rider revenues. Form 3.00, Column 5 includes the

revenues related to Environmental Surcharge Mechanism rolled into base rates in Case No.

2023-00374 and the revenues collected through the Environmental Surcharge Mechanism

Rider. All revenues, base and rider, related to the Environmental Surcharge Mechanism

1

should be removed for the allocation of jurisdictional revenues to residential and non-residential customers.

The calculation on Form 2.00, Lines 24-27, calculates the (over)/under recovery for the Environmental Surcharge Mechanism Rider only; therefore, the Jurisdictional E(m) Revenue Recovered in Current Expense Month on Form 2.00, Line 26, is the revenue charged or credited to the customers through Environmental Surcharge Mechanism Rider only.

Please see the table below for the breakout of the ESM revenues on Form 3.00, Column 5, between base revenues and rider revenues for February 2025.

	<u>Base</u>	<u>Rider</u>	<u>Total</u>
February 2025	<u>Revenues</u>	<u>Revenues</u>	<u>Revenues</u>
Residential	\$923,815	\$1,017,719	\$1,941,534 (b)
Non-Residential	\$954,155	\$1,051,142	\$2,005,297 (b)
	\$1,877,970	\$2,068,861 (a)	\$3,946,831 (b)

<sup>(</sup>a) Per Form 2.00, Line 26

Based on the explanation above, the (over)/under recovery calculation was not affected and does not need to be updated.

The Company will update Form 3.00 going forward to break out the Environmental Surcharge Revenues into the amounts included in base revenues and the rider revenues for transparency the same way fuel revenues are presented in the non-residential section of Form 3.00, Columns 3 and 4.

<sup>(</sup>b) Per Form 3.00, Column 5

STAFF Second Request for Information

Date Received: November 13, 2025

**STAFF-DR-02-004** 

## **REQUEST:**

Refer to ES Form 2.00, for the Expense Month of March 2025, Line No. 26 and ES Form 3.00. The Jurisdictional E(m) Revenue Recovered in Current Expense Month is reported here as \$2,233,490, but this amount is inconsistent with the amounts that should be carried forward from ES Form 3.00, equal to \$4,111,460, arising from the sum of Residential revenue of \$1,851,021 plus the Non-residential revenue of \$2,260,439 reported in March. Reconcile the differences and correct the forms and all other affected values. Update the over/under calculation, if affected.

		Mar-25	
Res.	ES	1,851,021	
Non-Res.	ES	2,260,439	
	Total Revenues	4,111,460	

#### **RESPONSE:**

The purpose of Form 3.00 is to calculate the residential and non-residential portions of Duke Energy Kentucky's total revenue for the most recent twelve months for use in allocating the Total Adjusted Net Jurisdictional E(m) on Form 1.10, Line 13, between residential and non-residential customers. The total revenue on Form 3.00, Column 2, includes base revenues and all electric rider revenues. Form 3.00, Column 5 includes the revenues related to Environmental Surcharge Mechanism rolled into base rates in Case No. 2023-00374 and the revenues collected through the Environmental Surcharge Mechanism

Rider. All revenues, base and rider, related to the Environmental Surcharge Mechanism should be removed for the allocation of jurisdictional revenues to residential and non-residential customers.

The calculation on Form 2.00, Lines 24-27, calculates the (over)/under recovery for the Environmental Surcharge Mechanism Rider only; therefore, the Jurisdictional E(m) Revenue Recovered in Current Expense Month on Form 2.00, Line 26, is the revenue charged or credited to the customers through Environmental Surcharge Mechanism Rider only.

Please see the table below for the breakout of the ESM revenues on Form 3.00, Column 5, between base revenues and rider revenues for March 2025.

	<u>Base</u>	Rider	<u>Total</u>	
March 2025	<u>Revenues</u>	<u>Revenues</u>	<u>Revenues</u>	
Residential	\$845,481	\$1,005,540	\$1,851,021	(b)
Non-Residential	\$1,032,489	\$1,227,950	\$2,260,439	(b)
	\$1,877,970	\$2,233,490	a) \$4,111,460	(b)

<sup>(</sup>a) Per Form 2.00, Line 26

Based on the explanation above, the (over)/under recovery calculation was not affected and does not need to be updated.

The Company will update Form 3.00 going forward to break out the Environmental Surcharge Revenues into the amounts included in base revenues and the rider revenues for transparency the same way fuel revenues are presented in the non-residential section of Form 3.00, Columns 3 and 4.

<sup>(</sup>b) Per Form 3.00, Column 5