

KyPSC Case No. 2025-00258
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VERIFICATION

STATE OF OHIO)
COUNTY OF HAMILTON)
SS:

The undersigned, Bruce L. Sailers, Director Jurisdictional Rate Administration, being duly sworn, deposes and says that he has personal knowledge of the matters set forth in the foregoing data requests, and that the information contained therein is true and correct to the best of his knowledge, information, and belief.

Bruce L. Sailers
Bruce L. Sailers, Affiant

Subscribed and sworn to before me by Bruce L. Sailers on this 5th day of January, 2026

Ed Sull
NOTARY PUBLIC

My Commission Expires: July 8, 2027



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

VERIFICATION

STATE OF OHIO)
)
COUNTY OF HAMILTON) SS:

The undersigned, Dominic "Nick" J. Melillo, Director Distribution Asset Management, being duly sworn, deposes and says that he has personal knowledge of the matters set forth in the foregoing data responses, and that the answers contained therein are true and correct to the best of his knowledge, information, and belief.

Dominic "Nick" J. Melillo
Dominic "Nick" J. Melillo, Affiant

Subscribed and sworn to before me by Dominic "Nick" J. Melillo on this 5th day of January, 2026.

EloSeiler
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. 2025-00258
STAFF First Request for Information
Date Received: December 19, 2025

STAFF-DR-05-001

REQUEST:

Refer to Duke Kentucky's response to Commission Staff's Second Request for Information (Staff's Second Request), Item 4.

- a. Explain whether Duke Kentucky would consider updating the Avoided Cost Excess Generation Credit (ACEGC) on an every-two year or every-three year cadence on a formulaic basis.
- b. Explain whether there are any elements of the ACEGC that could not be formulaically updated on a regular basis once a methodology has been determined in this instant proceeding?

RESPONSE:

a. Consistent with the Company's response to STAFF-DR-02-004, yes. The Company suggests an update every two years similar to the Company's cogeneration filing. The Company also suggests starting this cadence in 2028.

b. If the formulaic update is the same calculation as the Company proposes in this proceeding, or using the same inputs, there should not be an update issue. However, it is not certain what sort of methodology the Commission will order so the Company is unable to respond with absolute certainty regarding the ability to update all items.

PERSON RESPONSIBLE: Bruce L. Sailers

Duke Energy Kentucky
Case No. 2025-00258
STAFF First Request for Information
Date Received: December 19, 2025

STAFF-DR-05-002

REQUEST:

Refer to Duke Kentucky's response to Staff's Second Request, Item 6(b).

- a. Provide an avoided Transmission capacity value that is calculated from the last three years (2022-2024) of actual Duke Energy Kentucky System Peak Loads as provided in the response, and behind the meter solar expected contribution to the monthly peak hour (ratio of generation in that hour compared to nameplate based on the PV Watts profile used to calculate the avoided energy costs) in months with the four highest peaks per year. Include in the response all workpapers in excel format with all cells visible and unprotected.
- b. Explain whether calculating an avoided transmission cost in this manner would be reasonable to Duke Kentucky. If not, explain why not and propose alternative assumptions and calculations for any element that is not reasonable in Duke Kentucky's estimation.
- c. Provide an avoided distribution capacity value that is calculated based on the behind-the-meter solar-expected capacity contribution (ratio of generation in that hour compared to nameplate based on the PV Watts profile used to calculate the avoided energy costs) for an average of the four highest load hours for a typical residential and a typical commercial feeder across the months of July to September as provided in the response to Staff's Second Request, Item 6(d). Average those avoided distribution capacity values for a residential and commercial feeder based on a weighting for each class to determine an

average solar avoided distribution capacity cost. Include in the response all workpapers in excel format with all cells visible and unprotected.

d. Explain whether calculating an avoided Distribution cost in this manner would be reasonable? If not, please explain why not and propose alternative assumptions and calculations for any element that is not reasonable in Duke Kentucky's estimation.

RESPONSE:

The Company is in the process of preparing the requested calculations and will supplement this response on or before January 16, 2026 as requested in the Company's pending Motion for an Extension of Time filed on December 23, 2025.

PERSON RESPONSIBLE: Bruce L. Sailers

Duke Energy Kentucky
Case No. 2025-00258
STAFF First Request for Information
Date Received: December 19, 2025

STAFF-DR-05-003

REQUEST:

Refer to Duke Kentucky's response to Commission Staff's Fourth Request(Staff's Fourth Request), Item 1 and Staff's Second Request, Item7(a) Attachment. Using the hourly data contained in Staff's Second Request, Item7(a) Attachment, provide an annual system loss value that is limited to the daylight hours when solar is generating. Include in the response all workpapers in excel format with all cells visible and unprotected.

RESPONSE:

The Company is in the process of preparing the requested calculations and will supplement this response on or before January 16, 2026 as requested in the Company's pending Motion for an Extension of Time filed on December 23, 2025.

PERSON RESPONSIBLE: Dominic "Nick" J. Melillo

**Duke Energy Kentucky
Case No. 2025-00258
STAFF First Request for Information
Date Received: December 19, 2025**

STAFF-DR-05-004

REQUEST:

Refer to Duke Kentucky's notice requesting that this matter be taken under submission and decided based upon the written record. State whether Duke Kentucky continues to request that this matter be taken under submission and decided based upon the written record.

RESPONSE:

Duke Energy Kentucky continues to request that this matter be taken under submission and decided based upon the written record. If, however, the Commission determines a hearing should occur, Duke Energy Kentucky reserves its right to fully participate in such hearing.

PERSON RESPONSIBLE: Legal