KyPSC Case No. 2025-00258
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VERIFICATION

STATE OF OHIO)
) **SS:**
COUNTY OF HAMILTON)

The undersigned, Bruce L. Sailers, Director 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 answers contained therein are 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 3rd day of December, 2025

NOTARY PUBLIC

My Commission Expires: July 8, 2027

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

VERIFICATION

STATE OF NORTH CAROLINA)
)
COUNTY OF MECKLENBURG)

SS:

The undersigned, John D. Swez, Managing Director, Trading and Dispatch, being duly sworn, deposes and says that he has personal knowledge of the matters set forth in the foregoing post hearing 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 4th day of December 2025.

JENNY PATTANA NOTARY PUBLIC CABARRUS COUNTY, NC

NOTARY PUBLIC

My Commission Expires: 06/08/2030

Duke Energy Kentucky
Case No. 2025-00258
STAFF's Fourth Request for Information
Date Received: November 24, 2025

STAFF-DR-04-001

REQUEST:

Refer to the Direct Testimony of Bruce Sailers (Sailers Direct Testimony), page 8, lines 17–18, through page 9, lines 1–8 and Confidential Attachment BLS-1, Tab 2 (Avoided Energy).

a. State whether Duke Energy can recalculate the system losses to be reflective of the relative hours when solar generation is operating in a comparable manner as it calculated the avoided energy costs.

b. If so, calculate the system losses to be reflective of the relative hours when solar generation is operating.

RESPONSE:

a. No, not in the short term. The Company has not calculated hour-by-hour losses in the past and would require a significant effort to produce and review this information. Further, if the Company would embark on a project to create hourly loss information, it is not certain that the results would be viewed as comparable by the Commission. The avoided energy costs are projected and modeled values hourly for 25 years and among other inputs, use typical weather conditions. They are then weighted with PV Watts solar output weights that are also created using typical weather conditions. On the other hand, the loss values are actual, historic values that embed actual weather and load conditions. To obtain a solar production weighted loss value, a solar production profile using the historic information would best fit. In addition, Peak loss values might

be impacted significantly in winter months depending on the hour of the peak and the corresponding solar production weight.

b. N/A

PERSON RESPONSIBLE: Bruce L. Sailers

Duke Energy Kentucky
Case No. 2025-00258
STAFF's Fourth Request for Information
Date Received: November 24, 2025

STAFF-DR-04-002

REQUEST:

Refer to Sailers Direct Testimony, page 11, lines 16–22, through page 12, lines 1–2.

a. Explain whether Duke Kentucky considered calculating the avoided transmission costs based on the PJM market costs for transmission service.

b. If not, explain why not.

c. Explain why Duke Kentucky believes that its proposed approach is more reflective of the avoided transmission costs arising from behind the meter solar.

d. Calculate the avoided transmission costs based on the PJM market costs for transmission service. Include the workpapers in Excel spreadsheet format with all formulas, columns, and rows unprotected and fully accessible.

RESPONSE:

a. No. The Company is unclear on the meaning behind "PJM market costs for transmission service," and the Company is not sure what is being requested. The Company's approach is explained further below in parts b and c.

b. In general, the Commission has promoted forward-looking avoided costs; only those costs that are avoided by the excess generation of Net Metering II installations. The Company anticipated that its methodology proposed here would be acceptable, as the Company is proposing to use its established methodology for determining avoided transmission costs used to evaluate the cost effectiveness of EE/DSM programs, which considers only capacity for growth related projects. In this proceeding specifically, the

Company proposes to apply this existing methodology incorporating publicly available FERC Form 1 inputs, in order to better meet the Commission's expressed desire for publicly available data.

c. See the response to part b above. The proposed avoided transmission cost calculation is focused on avoided transmission capacity, and applies an established methodology incorporating publicly available FERC Form 1 data.

d. As stated in the response to part a above, the Company does not understand what is being referred to by "PJM market costs for transmission service."

PERSON RESPONSIBLE: Bruce L. Sailers

Duke Energy Kentucky
Case No. 2025-00258
STAFF's Fourth Request for Information
Date Received: November 24, 2025

STAFF-DR-04-003

REQUEST:

Refer to Duke Kentucky's responses to Commission Staff's Second Request for Information (Staff's Second Request), Item 8, Confidential Attachment, and the Direct Testimony of John D. Swez (Swez Direct Testimony), page 18, line 17 through page 19, line 18.

a. State if the following PJM Billing Line Items would be either impacted by a change in PJM market participant load ratio share as a result of behind the meter solar, or behind the meter solar would otherwise cause a reduction in costs from PJM not already accounted for in another avoided cost category.

(1) 1230 – Inadvertent Interchange

(2) 1242 – Day-Ahead Load Response Charge Allocation

(3) 1243 – Real-Time Load Response Charge Allocation

(4) 1246 – Load Response Test Reduction

(5) 1301 – PJM Scheduling, System Control and Dispatch Service – Control Area Administration

(6) 1302 – PJM Scheduling, System Control and Dispatch Service – FTR Administration

(7) 1303 – PJM Scheduling, System Control and Dispatch Service – Market Support

(8) 1305 – PJM Scheduling, System Control and Dispatch Service – Capacity Resource / Obligation Management

(9) 1313 – PJM Settlement, Inc.

(10) 1314 – Market Monitoring Unit (MMU) Funding

(11) 1315 – FERC Annual Charge Recovery

(12) 1316 – Organization of PJM States, Inc. (OPSI) Funding

(13) 1317 – North American Electric Reliability Corporation (NERC)

(14) 1318 – Reliability First Corporation (RFC)

(15) 1319 – Consumer Advocates of PJM States, Inc. (CAPS)

(16) 1320 – Transmission Owner Scheduling, System Control and Dispatch Service

(17) 1330 – Reactive Supply and Voltage Control from Generation and Other Sources Service

(18) 1340 – Regulation and Frequency Response Service

(19) 1360 – Synchronized Reserve

(20) 1361 – Secondary Reserve

(21) 1362 – Non-Synchronized Reserve

b. If the answer of any of the above items is yes, calculate the avoided cost per kWh of solar energy produced from behind the meter solar.

c. If the answer of any of the above items is no, explain why Duke Kentucky believes that costs for those Billing Line Items would not be avoided from behind the meter solar.

RESPONSE:

a. Please refer to the response to STAFF-DR-01-006 and STAFF-DR-01-006 Attachment for a complete listing of the 37 PJM BLI charges or credits allocated by PJM fully or partially on a load ratio share basis or where using load as an input to the BLI calculation.

- Since they are listed in STAFF-DR-01-006 Attachment, the Company believes that the following 16 BLIs are impacted by an amount of behind the meter solar generation: BLIs 1230, 1242, 1243, 1246, 1301, 1303, 1313, 1315, 1316, 1317, 1318, 1319, 1340, 1360, 1361, and 1362. These BLIs, of the twenty-one listed in the above request, are believed to be impacted because they are calculated at least partially based on load ratio share.
- Since they are not listed in STAFF-DR-01-006 Attachment, the Company believes that the following 5 BLIs are not impacted by an amount of behind the meter solar generation: BLIs 1302, 1305, 1314, 1320, and 1330. These BLIs, of the twenty-one listed in the above request, are not believed to be impacted because load ratio share or load is not used in the calculation.

b. As stated in the Company's response to STAFF-DR-01-006, the Company is unable to determine what each of the 16 identified individual PJM BLIs in the response to a. above would have been had there been no behind the meter solar generation. The Company does not have access to the PJM software that would be needed to perform the calculations necessary to estimate the new PJM BLI amounts that would have resulted in the absence of behind the meter solar generation. Note that the Company did provide an

estimate for the BLIs associated with impacted ancillary services in response to STAFF-DR-01-006, part (c), specifically for BLI 130, 1360, 1361, and 1362.

In addition, referring to pages 17-18 of the direct testimony of Witness John Swez in this proceeding, although behind the meter solar generation is a low-cost provider of energy, due to its intermittent nature, these resources create additional challenges for grid operators and require that additional quantities of ancillary services be supplied by other resources. Thus, even though behind the meter solar generation resources reduce load and therefore reduce charges or credits for certain PJM BLIs, behind the meter solar resources also increase the amount of ancillary services held by PJM and therefore increase the costs associated with these ancillary service BLIs.

c. Of the 21 PJM BLIs listed in the above request, the five identified PJM BLIs in the response to part a. above do not use customer demand as a determinant in the individual BLI calculation. Thus, a change to the customer demand from an additional amount of behind the meter solar generation will have no impact on these BLI amounts.

PERSON RESPONSIBLE: John D. Swez

Duke Energy Kentucky
Case No. 2025-00258
STAFF's Fourth Request for Information
Date Received: November 24, 2025

STAFF-DR-04-004

REQUEST:

Refer to Swez Direct Testimony, page 18, line 17, through page 19, line 18. Provide the monthly MWh billing determinant from PJM for the months of October 2024 through September 2025.

RESPONSE:

Please see STAFF-DR-04-004 Attachment.

PERSON RESPONSIBLE: John D. Swez

Month	DEK	EKPC_RESID_AGG	Total DEK
10-2024	308,326	7,244	315,570
11-2024	301,611	8,592	310,203
12-2024	354,694	11,085	365,779
01-2025	411,040	13,626	424,666
02-2025	344,094	8,801	352,894
03-2025	327,686	6,898	334,584
04-2025	306,892	6,402	313,295
05-2025	313,793	6,712	320,505
06-2025	402,905	9,173	412,079
07-2025	457,848	10,822	468,670
08-2025	409,425	9,487	418,912
09-2025	350,599	8,241	358,839
Total	**4,288,913**	**107,083**	**4,395,996**

Note that the amounts for October 2024 though August 2025 include an amount for load reconcilation (adjustment). The amounts for September do not include the final PJM reconcilation, since this occurs on a two month billing lag and has not occurred to date.