

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF DUKE ENERGY KENTUCKY,)	CASE NO.
INC. FOR AN ADJUSTMENT TO RIDER NM II)	2025-00258
RATES AND FOR TARIFF APPROVAL)	

DUKE ENERGY KENTUCKY, INC.'S
MOTION FOR AN EXTENSION OF TIME

Comes now Duke Energy Kentucky, Inc. (Duke Energy Kentucky or Company), by counsel, pursuant to 807 KAR 5:001, Section 9, and other applicable law, and moves the Kentucky Public Service Commission (Commission) for an extension of ten (10) calendar days, to January 16, 2026, to file its responses to Commission Staff's Fifth Request for Information, Items 2 and 3, as issued in its December 19, 2025 Fifth Request for Information (Fifth Request).

Item 2 requests as follows:

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.

Item 3 requests as follows:

Refer to Duke Kentucky's response to Commission Staff's Fourth Request (Staff's Fourth Request), Item 1 and Staff's Second Request, Item 7(a) Attachment. Using the hourly data contained in Staff's Second Request, Item 7(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.

As the Company understands subparts 2(a) and 2(c) of this request, they will require the Company to perform a number of complex queries and then perform and validate additional calculations, a process which will require the participation of multiple personnel. Additionally, the Company expects to have substantive responses to subparts 2(b) and 2(d) which it believes will aid the Commission's review and contribute to a comprehensive understanding of the factors impacting analyses. Finally, Item 3 will require the Company to calculate an annual system loss value based on hourly system loss percentages. These results will be reviewed closely to ensure accuracy. Respectfully, the Company requests herein to be granted sufficient additional time to complete the above responses.

Pursuant to the Fifth Request, which was issued on the afternoon of Friday, December 19, 2025, the Company's responses are due January 6, 2025. The Company

respectfully submits that additional time, approximately ten (10) calendar days, is required to complete the requested data extraction and calculations in response to Items 2 and 3.

The Company submits that good cause exists to grant the additional time to provide its responses to Items 2 and 3 due to the above-described work required, especially since the Company has not previously performed these precise calculations. In addition to the required work, the Company faces resource constraints due to planned time off of certain necessary personnel over the holidays, as well as relevant personnel changes.

As a result of the aforementioned and contributing factors, the Company is unable to complete the above responses by January 6, the due date for responses. However, additional time, approximately ten (10) calendar days will provide the Company with sufficient time to complete its responses to Items 2 and 3. If the Company is able to complete its responses to Items 2 and 3 prior to January 16, the requested ten-calendar-day extension, the Company will file such responses earlier.

In this proceeding, there are no intervenors and therefore no party will be prejudiced from the granting of an extension. Additionally, although the suspension of the proposed tariffs will expire on February 4, 2026, Duke Energy Kentucky will not exercise its right to put the proposed tariffs into effect until an order is issued in this case. This should allow the Commission sufficient time for its review before rendering a decision.

WHEREFORE, Duke Energy Kentucky, Inc. respectfully requests the Commission enter an Order granting the Company a ten-calendar-day extension, through January 16, 2026, to file its responses to Commission Staff's Items 2 and 3 as contained in its December 19, 2025 Fifth Request for Information.

Respectfully submitted,

DUKE ENERGY KENTUCKY, INC.

/s/Larisa M. Vaysman

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CERTIFICATE OF SERVICE

This is to certify that the foregoing electronic filing is a true and accurate copy of the document in paper medium; that the electronic filing was transmitted to the Commission on December 23, 2025; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and that submitting the original filing to the Commission in paper medium is no longer required as it has been granted a permanent deviation.¹

/s/Larisa M. Vaysman
_____ *Counsel for Duke Energy Kentucky, Inc.*

¹ *In the Matter of Electronic Emergency Docket Related to the Novel Coronavirus COVID-19, Order, Case No. 2020-00085 (Ky. P.S.C. July 22, 2021).*