

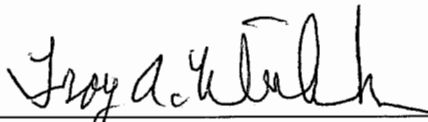
KyPSC Case No. 2025-00281
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VERIFICATION

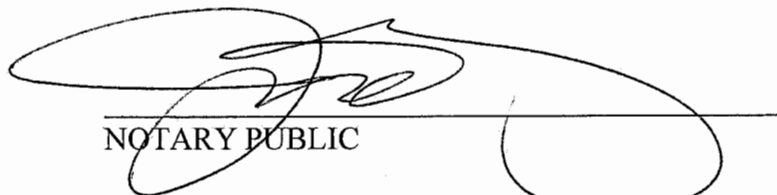
STATE OF OHIO)
)
COUNTY OF HAMILTON) SS:

The undersigned, Troy A. Wilhelm, Senior Project Manager, 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.



Troy A. Wilhelm, Affiant

Subscribed and sworn to before me by Troy A. Wilhelm on this 30th day of September, 2025.



NOTARY PUBLIC

My Commission Expires: 4/18/2026



VERIFICATION

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

The undersigned, Danielle L. Weatherston, Manager Accounting II, 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.

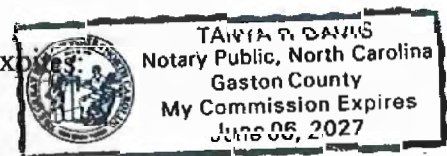
Danielle Weatherston
Danielle L. Weatherston, Affiant

Subscribed and sworn to before me by Danielle L. Weatherston on this 29TH day
of September, 2025.

Tanya R. Davis

NOTARY PUBLIC

My Commission Expires: 01/01/2011



VERIFICATION

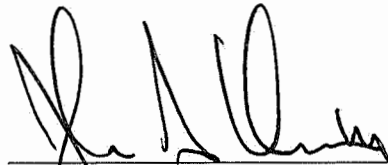
STATE OF NORTH CAROLINA)

)

SS:


COUNTY OF MECKLENBURG)

The undersigned, John A. Verderame, Senior Vice President, Fuels & Systems, 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.



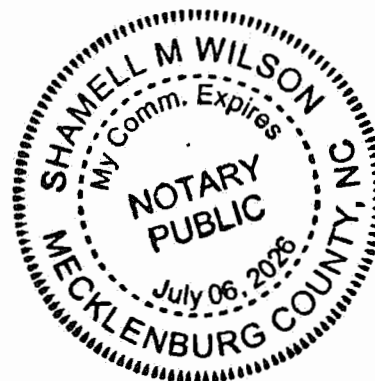
John A. Verderame, Affiant

Subscribed and sworn to before me John A. Verderame on this 24th day of September, 2025.



NOTARY PUBLIC

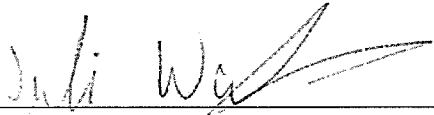
My Commission Expires:



VERIFICATION

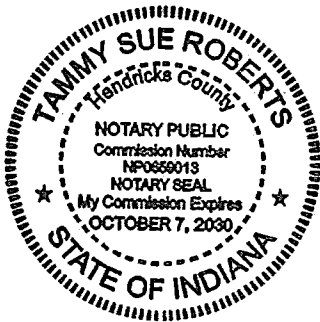
STATE OF INDIANA)
) SS:
COUNTY OF HENDRICKS)

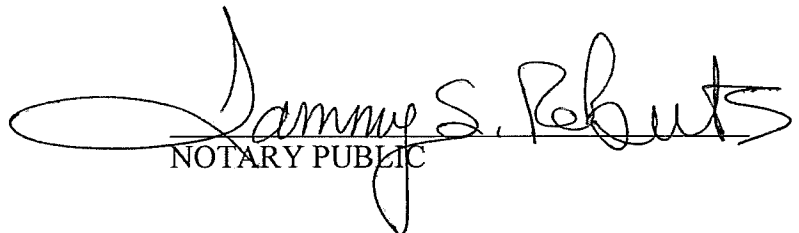
The undersigned, Julie Walters, Lead EHS Consultant, being duly sworn, deposes and says that she has personal knowledge of the matters set forth in the foregoing data requests, and that the answers contained therein are true and correct to the best of her knowledge, information, and belief.



Julie Walters, Affiant

Subscribed and sworn to before me by Julie Walters on this 23rd day of September, 2025.





NOTARY PUBLIC

My Commission Expires: 10/7/2030

VERIFICATION

STATE OF OHIO)
) SS:
COUNTY OF HAMILTON)

The undersigned, Chad M. Donner, Manager Generation, 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.



Chad M. Donner, Affiant

Subscribed and sworn to before me by Chad M. Donner on this 3rd day of October, 2025.



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. 2025-00281
STAFF's First Request for Information
Date Received: September 22, 2025

STAFF-DR-01-001

REQUEST:

Refer to the Application, page 9, paragraph 20 and Exhibit A. Provide an individual breakdown of costs, including but not limited to costs for analysis, surveying, engineering, project support, materials (for engineering), contract labor, and overhead, incurred for the Certificate of Public Convenience and Necessity (CPCN) Application and the Revised CPCN Application, by application.

RESPONSE:

Charge Type	Expenditure Type	Description	Limestone	MATS	Remaining 2025 MATS Forecast		Total
					August-December		
AFUDC Debt (99970)	Additions		\$ 33,844	\$ 33,844	\$	98,000	
AFUDC Equity (99971)	Additions		\$ 96,168	\$ 96,168			
Company Labor - Exempt (1100)	Additions	Internal Engineering and Project Support Services	\$ 104,000	\$ 104,000	\$	-	
Company Material (21000)	Additions	Miscellaneous material needed for engineering	\$ 2,074	\$ 2,074			
Contingency (94008)	Additions			\$ -			
Contract Labor (63400)	Additions	External Engineering and Project Support Services	\$ 1,778,000	\$ 1,778,000	\$	-	
Labor Loadings - Exempt (19001)	Additions		\$ 223,585	\$ 223,585	\$	-	
Labor Loadings (19000)	Additions		\$ 38	\$ 38			
Other	Additions		\$ 24,767	\$ 24,767			
Other-Accruals (35000)	Additions			\$ -			
Overhead (79000)	Additions		\$ 632,000	\$ 632,000	\$	-	
Staff Augmentation (69000)	Additions	Contractor Support for Site Surveying and laser scans	\$ 8,631	\$ 8,631			
Stores Loading Allocation (2900)	Additions		\$ 160	\$ 160			
Contract Labor (63400)	Cost of Removal	Demolition Engineering and Project Support Services	\$ 42,927	\$ 42,927			
Overhead (79000)	Cost of Removal		\$ 90	\$ 90			
		Totals	\$ 2,936,284	\$ 2,936,284	\$ 98,000	\$	5,970,568

PERSON RESPONSIBLE: Troy Wilhelm

Duke Energy Kentucky
Case No. 2025-00281
STAFF's First Request for Information
Date Received: September 22, 2025

STAFF-DR-01-002

REQUEST:

Refer to the Application, paragraphs 26 and 27.

- a. State when Duke Kentucky will provide the actual costs incurred for the expenditures.
- b. Explain how Duke Kentucky will record the accounting entries to create the deferrals necessary if the 2024 Mercury Air Toxics Standard (MATS) is still pending as of December 31, 2025.

RESPONSE:

- a. To date, Duke Energy Kentucky has recorded \$2,936,284 of O&M costs in a 512 FERC account and reclassified \$2,936,283 into a different CWIP project pending the resolution of the 2024 Mercury Air Toxics Standard (MATS) update. Actual costs incurred to date will be available after the books are closed for the third quarter.
- b. Costs associated with MATS update that are currently in CWIP will remain so at year end, assuming that the final decision is still pending, or if the update is upheld. In the case that the 2024 MATS standard is repealed by the US EPA, these costs would be moved to the requested regulatory asset at the time of the repeal.

PERSON RESPONSIBLE: Danielle Weatherston

Duke Energy Kentucky
Case No. 2025-00281
STAFF's First Request for Information
Date Received: September 22, 2025

STAFF-DR-01-003

REQUEST:

Refer to Application, page 3, paragraph 6. Identify and explain any options for magnesium enhanced hydrated lime (MEL) suppliers Duke Kentucky has identified.

RESPONSE:

The Company's current contract was executed through a public request for proposal (RFP) issued in 2023 for the MEL product. The solicitation was sent to eleven potential lime suppliers which included the major known producers of the product needed for East Bend Station. The Company received two bids for the requested and complying product. However, one bid was subsequently recalled by the bidder leaving Carmeuse as the only remaining identified supplier.

PERSON RESPONSIBLE: John A. Verderame

**Duke Energy Kentucky
Case No. 2025-00281
STAFF's First Request for Information
Date Received: September 22, 2025**

**CONFIDENTIAL STAFF-DR-01-004
(As to Attachments only)**

REQUEST:

Refer to Application, page 5–6, paragraph 10.

- a. Provide the analysis that “showed that accepting a revised new MEL long-term supply contract was the least cost, most reasonable solution for customers for the foreseeable contract term.”
- b. Provide the revised new MEL long-term supply contract.

RESPONSE:

CONFIDENTIAL PROPRIETARY TRADE SECRET (As to Attachments only)

- a. Accepting a revised new MEL-longer-term supply contract beginning July 1, 2025, provides a cost reduction relative to the most recent MEL pricing and with additional supply protection compared to what has been experienced and available over the last several years. Through these carefully negotiated and highly favorable contract terms, the Company has been able to address the supply concerns and reasons for pursuing the Limestone Conversion investment, for the foreseeable future. Additionally, the Company has secured contractual assurances that if the MEL product from the supplier's primary source becomes unavailable during the contract period, they will provide an equivalent chemically acceptable lime product from their secondary source in a timely manner. The new long-term MEL with its highly favorable contract pricing, commercial protections, and longer duration would not have been possible without the commercial leverage created

by the Company's initial and continued pursuit of the Limestone Conversion CPCN Application and Revised CPCN Application of which the requested deferral costs in the Company's Application for a Regulatory Asset were reasonable and necessary expenses.

With the lower MEL product cost and longer contract duration, the projected fuel and purchase power cost savings of the proposed Limestone Conversion declined considerably. While on average the Limestone Conversion continued to maintain a marginal economic advantage when evaluated solely from an economic dispatch perspective, the more immediate reduction in MEL and quicklime reagent expense in the new contracts positively impacts East Bend's ability to competitively dispatch into the PJM energy market. When factoring in maintaining the status quo of a MEL-based reagent system and avoiding the estimated \$125 million in expected capital costs of the full Limestone Conversion project, the new MEL long-term supply contract was the least cost, most reasonable solution for customer. Please see STAFF-DR-01-004(a) Confidential Attachment.

b. Please see STAFF-DR-01-004(b) Confidential Attachment for the revised new MEL long-term supply contract.

PERSON RESPONSIBLE: John A. Verderame

CONFIDENTIAL PROPRIETARY TRADE SECRET

**STAFF-DR-01-004(a) CONFIDENTIAL
ATTACHMENT**

FILED UNDER SEAL

CONFIDENTIAL PROPRIETARY TRADE SECRET

**STAFF-DR-01-004(b) CONFIDENTIAL
ATTACHMENT**

FILED UNDER SEAL

Duke Energy Kentucky
Case No. 2025-00281
STAFF's First Request for Information
Date Received: September 22, 2025

STAFF-DR-01-005

REQUEST:

Refer to Application, page 6, paragraph 12. Provide, as they become available, any updates on the EPA's proposal to repeal certain amendments to some environmental regulations that affect coal-fired generation, including the MATS provisions, reverting those standards to pre-2024 requirement. Consider this an ongoing request.

RESPONSE:

Currently, Duke Energy Kentucky has not received new information concerning the 2024 Mercury and Air Toxics Standards (MATS) proposed rules. The EPA's Spring 2025 Agency Rule List indicates that the final rule is scheduled for December 2025. The company is actively monitoring developments in the rulemaking process.

PERSON RESPONSIBLE: Julie L Walters

STAFF-DR-01-006

REQUEST:

Refer to the Application, page 10, paragraph 21.

a. Provide whether all costs incurred by Duke Kentucky that it is requesting to defer were necessary in the development and support of its CPCN Application and Revised CPCN Application. If certain costs were not necessary in the development of the Applications, specify those costs.

b. Provide whether Duke Kentucky, prior to the CPCN Application and Revised CPCN Application being withdrawn, anticipated deferring the costs associated with developing these applications, if the Commission were to deny Duke Kentucky's requests for CPCNs.

RESPONSE:

a. Yes, all costs were necessary and directly related to the development and support of the CPCN application.

b. The Company did not anticipate a need for deferring costs associated with the development of the applications. As the application states, the company had every intention of pursuing the Limestone Conversion CPCN with recovery through the ESM as analysis showed, based upon then existing lime costs, that conversion was the least cost solution for customers for the unit to continue to comply with environmental regulations and address the risks of reagent supply uncertainty, scarcity, and price escalations.

PERSON RESPONSIBLE: Chad Donner