KyPSC Case No. 2025-00324
TABLE OF CONTENTS

DATA REQUEST	WITNESS	TAB NO.
STAFF-DR-01-001	Andrew J. Cassidy	1
STAFF-DR-01-002	Andrew J. Cassidy	2
STAFF-DR-01-003	James E. New	3
STAFF-DR-01-004	James E. New	4
STAFF-DR-01-005	B. Mitchell Martin	5
STAFF-DR-01-006	James E. New	6
STAFF-DR-01-007	Brian M. Enlow Dominic “Nick” J. Melillo	7
STAFF-DR-01-008	Andrew J. Cassidy	8

VERIFICATION

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

The undersigned, Andrew J. Cassidy, General Manager, Emergency Preparedness for the Midwest, 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.

Andrew J. Cassidy, Affiant

Subscribed and sworn to before me by Andrew J. Cassidy on this 9th day of November, 2026.

NOTARY PUBLIC

My Commission Expires: July 8, 2027

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

VERIFICATION

STATE OF Indiana)
) **SS:**
COUNTY OF Hendricks)

The undersigned, Brian M. Enlow, Director PGO Asset Management, 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.

Brian M. Enlow, Affiant

Subscribed and sworn to before me by Brian M. Enlow on this 9th day of November, 2026.

NOTARY PUBLIC

My Commission Expires:

CASSANDREA M SHAFER
Notary Public - Seal
Hendricks County - State of Indiana
Commission Number NP0753076
My Commission Expires Nov 28, 2031

VERIFICATION

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

The undersigned, B. Mitchell Martin, Manager, Rates & Regulatory Strategy, 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.

B. Mitchell Martin, Affiant

Subscribed and sworn to before me by B. Mitchell Martin on this 5th day of November, 2026.

NOTARY PUBLIC

My Commission Expires: July 8, 2027

NOTARY PUBLIC STATE OF OHIO

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

VERIFICATION

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

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 requests, and that the answers contained therein are true and correct to the best of his knowledge, information, and belief.

Dominic "Nick" J. Melillo, Affiant

Subscribed and sworn to before me by Dominic "Nick" J. Melillo on this 4th day of November, 2026.

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)
) SS:
COUNTY OF MECKLENBURG)

The undersigned, James E. New, Manager, Finance II, 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.

James E. New, Affiant

Subscribed and sworn to before me by James E. New on this 4 day of November, 2026.

NOTARY PUBLIC

My Commission Expires: AH July 6, 2030

ANGELA HUNTER
Notary Public - North Carolina
Lincoln County
My Commission Expires Jul 6, 2030

Duke Energy Kentucky
Case No. 2026-00295
STAFF First Request for Information
Date Received: October 22, 2026

STAFF-DR-01-001

REQUEST:

Refer to the Application, paragraph 1 and footnote 1. The hyperlink Duke Kentucky referenced in paragraph 1, footnote 1 is broken. Provide evidence supporting Duke Kentucky's claim it experienced a major weather event with damaging winds in its service territory during August of 2026.

RESPONSE:

It appears that the hyperlink address in the Company's Application inadvertently omitted the last two characters. The full link, https://www.weather.gov/iln/20260811, if pasted into the browser should generate the correct page. Additionally, the following weather observations are indicators of the severity of the August 2026 major weather event:

- The Cincinnati / Northern Kentucky International Airport (KCVG) reported a peak wind gust of 59 mph.
- The Cincinnati Lunken Field (KLUK) reported a peak wind gust of 68 mph.
- There was a Storm Prediction Center (SPC) storm report of "numerous trees down" in Kenton County.
- There was an SPC storm report of "numerous large trees and tree limbs downed… with some snapped" in Campbell County.

The Company's damage assessment summary for Duke Energy Kentucky's Erlanger Operations Center includes the following: poles down - 59, transformers down - 37, conductor spans down - 192, cross arms down - 25, services down – 159.

PERSON RESPONSIBLE: Andrew J. Cassidy

Duke Energy Kentucky
Case No. 2026-00295
STAFF First Request for Information
Date Received: October 22, 2026

STAFF-DR-01-002

REQUEST:

Refer to the Application, paragraph 5. Duke Kentucky stated it experienced a severe weather event involving Major Event Days. State exactly how many Major Event Days Duke Kentucky experienced in its service territory as defined by IEEE Standard 1366.

RESPONSE:

As defined by IEEE Standard 1366, Duke Energy Kentucky experienced three consecutive Major Event Days (MEDs) during the August Derecho in its service territory, comprised of August 11th, 12th and 13th of 2026. The Company's efforts to repair the damage caused during these three MEDs and to restore service to impacted customers continued beyond these three days. The storm event was not internally canceled until approximately 8:09 p.m. August 15th. Even at this time, some storm-related outage incidents were still actively being worked.

PERSON RESPONSIBLE: Andrew J. Cassidy

Duke Energy Kentucky
Case No. 2026-00295
STAFF First Request for Information
Date Received: October 22, 2026

STAFF-DR-01-003

REQUEST:

Refer to the Application, paragraph 9. Provide a fully itemized breakdown, in Excel spreadsheet format with all formulas, columns, and rows unprotected and fully accessible, reflecting the estimated jurisdictional incremental Operations & Maintenance (O&M) costs associated with the August 11, 2026 Derecho (August Derecho). The response should include at minimum:

a. Labor (regular and overtime, separately stated);

b. Contract costs by vendor;

c. Materials and supplies by category; and

d. Any overhead allocations.

RESPONSE:

Please see STAFF-DR-01-003 Attachment which provides an itemized breakdown of the estimated O&M costs associated with the August 11, 2026 storm. Regular labor and overtime are separately stated, and overhead allocations are also separately stated. Please note the following:

- Contractor costs are estimated in total based on estimated contract hours worked and the estimate is not broken down by vendor at this time. Vendors used in storm restoration include Bowlin, ARC (or CA Advance), Intren, Asplundh, and others. An itemized contractor breakout by vendor will be available once storm costs are finalized.

- The materials estimate is driven from historical storm actuals. During storm restoration, many materials are issued and then unused materials must be returned to inventory and reconciled. Additional materials provided by vendors must also be reconciled and invoices submitted. For these reasons, materials are not categorized within the cost estimate. Typical O&M materials used for storm restoration include wire, bolts, splices, insulators, and others.

PERSON RESPONSIBLE: James E. New

Duke Energy Kentucky
Detailed Storm Restoration Cost Estimate (O&M)
August Derecho Storm Restoration Dates: August 11, 2026 - August 15, 2026

		Estimated O&M		
Duke Energy Kentucky Payroll			$	251,536
	Straight time labor	54,168		
	Overtime Labor	94,716		
	Labor Loadings	102,652		
Affiliate Payroll			$	320,226
	Straight time labor	61,699		
	Overtime Labor	177,945		
	Labor Loadings	80,582		
Contractor labor			$	2,166,768
	Linemen and Others	2,023,952		
	Bowlin			
	CA Advance			
	Intren			
	Others			
	Tree Trimming	142,815		
	Asplundh Tree Expert LLC			
	Others			
Overheads			$	133,514
Fleet			$	57,431
Expenses			$	165,015
	Logistics (travel expenses and meals)	117,179		
	Hotel	47,836		
Materials			$	146,474
	Wire	-		
	Bolts	-		
	Splices	-		
	Insulators	-		
	Foam Pole Setting kits	-		
	Other			
Total Storm Estimate			**$**	**3,240,964**
Normal Operations (non-incremental costs)			$	(111,808)
	DEK Straight time labor	(54,168)		
	DEK Labor Loadings	(37,348)		
	DEK Labor-related overheads	(20,292)		
Total Storm Estimate - Incremental Cost			**$**	**3,129,156**
Major Event Storm Costs in Base Rates			$	(1,000,000)
DEK Deferral Request			**$**	**2,129,156**

Duke Energy Kentucky
Case No. 2026-00295
STAFF First Request for Information
Date Received: October 22, 2026

STAFF-DR-01-004

REQUEST:

Refer to the Application, paragraph 9. Explain the process used to develop the preliminary cost estimate, including what costs were known versus estimated at the time of filing, any contingency factors applied, and expected margin of error.

RESPONSE:

The preliminary storm cost estimate was developed using an internal estimating worksheet that calculates the estimated costs for the storm beginning August 11, 2026 (August Derecho) based on resource counts, historical cost information, other estimating assumptions, and actual costs available at the time of the estimate. There is no contingency or expected margin of error within the estimate.

The Company calculates estimated cost for the August Derecho by calculating straight-time labor, overtime labor, and associated labor burdens for Duke Energy Kentucky employees, affiliated company employees, and contractor labor based on resource counts and estimated hourly rates. The Company then estimates overhead, expenses, fleet, and material costs using applicable internal rates, schedules, and historical information. Finally, the Company subtracts the estimates for non-incremental costs which include Duke Energy Kentucky straight time labor costs and the associated burdens and overheads to determine the total incremental cost. Additionally, where actual costs were available and exceeded the corresponding estimated amounts, the Company used the actual

costs in place of the estimates because they provided a more accurate representation of costs incurred as of that date.

At the time the application was prepared, only a limited amount of actual storm costs had been recorded on the Company's books. Storm costs recorded at the time of the filing include Company and affiliate employee labor and limited expenses. Accordingly, the filing schedule incorporates a combination of estimated costs and actual costs recorded through August 2026, which collectively represent the best estimate available at the time of the application.

PERSON RESPONSIBLE: James E. New

Duke Energy Kentucky
Case No. 2026-00295
STAFF First Request for Information
Date Received: October 22, 2026

STAFF-DR-01-005

REQUEST:

Explain how Duke Kentucky determines when to seek a regulatory asset for storm or other weather-related expenses, including any monetary thresholds.

RESPONSE:

There is no set monetary threshold that determines whether or not Duke Energy Kentucky will seek a regulatory asset for storm damage expenses. The Company monitors storm expenses on an ongoing basis and compares the expenses to the $1.0 million in the Company's base rates for major storm restoration. If the amount of actual (or estimated) major event storm expenses in excess of those already recovered in current rates is significant enough to meet the criterion of "an extraordinary, nonrecurring expense which could not have reasonably been anticipated or included in the utility's planning" as outlined by the Commission,[1] a request for deferral authority will be filed with the Commission. The Company evaluates whether to make a deferral request on a case-by-case basis, *i.e.,* whenever a particular storm meets this criterion.

PERSON RESPONSIBLE: B. Mitchell Martin

[1] *In the Matter of Electronic Joint Application of Kentucky Utilities Company and Louisville Gas & Electric Company for an Order Approving the Establishment of Regulatory Assets*, Case No. 2025-00025, Order, p. 3 (Ky. P.S.C. Mar. 19, 2025).

Duke Energy Kentucky
Case No. 2026-00295
STAFF First Request for Information
Date Received: October 22, 2026

STAFF-DR-01-006

REQUEST:

Refer to the Application, paragraph 6. Provide the expected timeline for when the actual storm-related costs will be finalized and filed with the Commission.

RESPONSE:

The Company expects the actual storm-related costs to be finalized and filed with the Commission in April 2027, after the March 2027 accounting close.

PERSON RESPONSIBLE: James E. New

Duke Energy Kentucky
Case No. 2026-00295
STAFF First Request for Information
Date Received: October 22, 2026

STAFF-DR-01-007

REQUEST:

Explain any new efforts Duke Kentucky is taking to harden its distribution and transmission systems against future storms.

RESPONSE:

Duke Energy Kentucky has not undertaken new distribution maintenance efforts specifically in response to the August 2026 Derecho for the purpose of hardening the distribution system against future storms. However, the Company continues to execute its existing distribution inspection and maintenance programs, including Line Patrol (LPR), Surface Mounted Equipment Inspection (SMEI) and Ground Line Treatment (GLT), and remains current with the work identified through those inspection programs. In addition, the Company continues to execute existing distribution reliability improvement initiatives, including self-optimizing grid (SOG) or self-healing technology.

There are no new transmission reliability investments in Duke Energy Kentucky's service territory specifically focused on storm hardening. However, ongoing investments in transmission pole replacements (wood to steel), as well as normal ongoing vegetation management improve the transmission grid's integrity during storm events.

The Company believes these are the appropriate level of investments to ensure the distribution and transmission systems are appropriately hardened against future storms.

PERSON RESPONSIBLE: Nick Melillo for Transmission
Brian M. Enlow for Distribution

Duke Energy Kentucky
Case No. 2026-00295
STAFF First Request for Information
Date Received: October 22, 2026

STAFF-DR-01-008

REQUEST:

Refer to Application, paragraph 8. Explain how Duke Kentucky chooses the "contract employees" who participate in storm damage restoration efforts.

RESPONSE:

For storm damage restoration efforts, Duke Energy Kentucky uses on-system contractors first. On-system contractors are those already working on routine non-storm-related work. Then, if additional resources are needed, the Company may bring in additional resources from other Company jurisdictions, leverage resources from other electric utilities through Mutual Assistance, or obtain off-system contract resources. Off-system contractors are those who are not working on the Company's system at the time of storm-related need and are brought in specifically to assist with storm restoration work. When selecting off-system contract resources, Duke Energy Kentucky factors in contractor rates, prior performance, and availability.

PERSON RESPONSIBLE: Andrew J. Cassidy