

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF DUKE ENERGY)	
KENTUCKY, INC., FOR: A CERTIFICATE OF)	
PUBLIC CONVENIENCE AND NECESSITY TO)	CASE NO.
CONSTRUCT PHASE TWO OF ITS WEST)	2018-00156
LANDFILL AND APPROVAL TO AMEND ITS)	
ENVIRONMENTAL COMPLIANCE PLAN FOR)	
RECOVERY BY ENVIRONMENTAL SURCHARGE)	
MECHANISM)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO
DUKE ENERGY KENTUCKY, INC.

Duke Energy Kentucky, Inc. (Duke Kentucky), pursuant to 807 KAR 5:001, is to file with the Commission the original in paper medium and an electronic version of its responses to the following information. The information requested herein is due on or before August 24, 2018. Responses to requests for information in paper medium shall be appropriately bound, tabbed, and indexed. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked. Each response shall include the name of the witness responsible for responding to the questions related to the information provided.

Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable

inquiry. Duke Kentucky shall make timely amendment to any prior response if it obtains information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which Duke Kentucky fails or refuses to furnish all or part of the requested information, it shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When filing a paper containing personal information, Duke Kentucky shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to the Direct Testimony of David Renner (Renner Testimony) at 4.
 - a. Define “open footprint for waste placement.”
 - b. Explain why Duke Kentucky proposes to construct the West Landfill Cell 2 with a footprint of 37 acres given that the West Landfill Cell 1’s 38-acre footprint “creates unnecessary operational constraints, particularly during the winter months.”
 - c. Explain whether the combination of the West Landfill Cell 1 and Cell 2 will provide the 55 open acres needed to properly form Poz-o-tec.
2. Refer to the Renner Testimony, Exhibit DR-1, at 1 of 2. Regarding Project EB020290 Lined Retention Basin West, provide the most current total spending to date on this project and whether the project is expected to be completed at or below its estimated cost.

3. Refer to the Direct Testimony of Adam S. Deller (Deller Testimony) at 2–3. Explain why the West Landfill requires a “lined leachate collection system” in addition to the Poz-o-tec process.

4. Refer to the Deller Testimony at 4. Provide a breakdown of the annual \$3.5 million on-site disposal expenses related to the proposed construction of the East Bend Landfill Cell 2.

5. Refer to the Deller Testimony at 7.

a. For each of the past five years, state how often Duke Kentucky has needed additional fly ash from the generating sources other than East Bend to produce Poz-o-Tec.

b. For each of the past five years, provide the transportation cost paid by Duke Kentucky to receive fly ash from generation sources other than East Bend.

c. At lines 7–8, a reference is made to the fact that the costs of transporting ash from the other generating sources was borne by Duke Kentucky on certain occasions. For the past five years, confirm that there were occasions on which Duke Kentucky did not have to pay any transportation costs associated with receipt of fly ash from generation sources other than East Bend, and state the reasons why no transportation cost was incurred by Duke Kentucky.

6. Refer to the Deller Testimony at 7–8.

a. Provide the identity of the third-party offsite landfill referenced on these pages.

b. Define what is meant by “reasonable proximity” and identify the third-party offsite landfills within this distance.

c. Provide the most recent date on which Duke Kentucky conducted a market inquiry for transportation of generator waste offsite.

d. Provide any written documentation received by Duke Kentucky as a result of its most recent market inquiry.

e. Provide the supporting documentation in connection with Duke Kentucky's \$76 per-ton estimate for transporting and disposing of generator waste offsite in a commercial landfill.

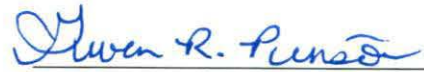
7. Refer to the Deller Testimony, Attachment ASD-1. Define "TPC (Class 5)," "ADV 1 Request," and "ETC."

8. Refer to the Direct Testimony of Sarah E. Lawler (Lawler Testimony), Attachment SEL-1, page 2 of 2.

a. Refer also to the Deller Testimony, Attachment ASD-1. Provide the components of the 2018 Cumulative Gross Plant of \$748,838 in the same format as Attachment ASD-1.

b. Refer also to the Application at 4. Provide the projected life of the West Landfill.

c. Refer also to Exhibit 4, page 44 of 510. Confirm that Duke Kentucky plans to place Cell 2 in service in the fourth quarter of 2019 when construction is completed. If this cannot be confirmed, explain.



Gwen R. Pinson
Executive Director
Public Service Commission
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DATED **AUG 08 2018**

cc: Parties of Record

Case No. 2018-00156

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