

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC TARIFF FILING OF DUKE)	
ENERGY KENTUCKY, INC. OF A NATURAL)	CASE NO.
GAS SERVICE MINIMUM USAGE)	2020-00041
AGREEMENT AND A PETITION FOR)	
CONFIDENTIAL TREATMENT)	

COMMISSION STAFF'S SECOND 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 an electronic version of the following information. The information requested herein is due on April 13, 2020. The Commission directs Duke Kentucky to the Commission's March 16, 2020 and March 24, 2020 Orders, in Case No. 2020-00085,¹ regarding filings with the Commission. The Commission expects the original documents to be filed with the Commission within 30 days of the lifting of the current state of emergency. 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

¹ Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC Mar. 16, 2020), Order at 5–6. Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC Mar. 24, 2020), Order at 1–3.

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, Duke Kentucky 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 applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. 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 Duke Kentucky's response to Commission Staff's First Request for Information (Staff's First Request), Item 1(b), Confidential Attachment, and Case No.

2019-00388,² Duke Kentucky's response to Commission Staff's First Request for Information, Item 3(c).

a. Confirm that the amount provided in both responses is not the estimated cost of the customer's service line, but the estimated cost of the entire customer's facilities, including allocated costs of the UL60 pipeline and Burlington Pike regulator station.

b. State whether the Incremental Customer Facilities are included in the total project estimate as provided in Case No. 2019-00388.

2. Refer to Duke Kentucky's response to Staff's First Request, Item 1(b), Confidential Attachment, and Case No. 2019-00388, Duke Kentucky's response to Commission Staff's First Request for Information, Item 5. Confirm that the "Overheads" included in the Incremental Customer Facilities include "AFUDC Debt," "Overhead & Allocations," or "Project Contingency." If this cannot be confirmed, explain.

3. Refer to Duke Kentucky's response to Staff's First Request, Item 1(b), and Confidential Attachment. Provide this attachment in Excel spreadsheet format, with the formulas intact and unprotected, and with all rows and columns fully accessible.

4. Refer to Duke Kentucky's response to Staff's First Request, Items 1(b), Confidential Attachment and 1(c). Explain why the description of the Incremental Customer Facilities includes meter stations, but the feasibility study is titled "Cust. Facilities w/Meters Removed."

² Case No. 2019-00388, *Electronic Application of Duke Energy Kentucky, Inc. for a Certificate of Public Convenience and Necessity Authorizing the Construction of a Gas Pipeline from Erlanger, Kentucky to Hebron, Kentucky* (Ky. PSC Mar. 27, 2020).

5. Refer to Duke Kentucky's response to Staff's First Request, Items 1(c) and 1(f). Confirm that references to "Additional Customer Facilities" should be "Additional Company Facilities." If this cannot be confirmed, provide an explanation of the same in full detail.

6. Refer to Duke Kentucky's response to Staff's First Request, Item 1(c). State whether the customer is allocated costs from one or both phases of the UL60 pipeline.

7. Refer to Duke Kentucky's response to Staff's First Request, Item 1(d). In the event that the Customer canceled or terminated gas service, confirm that the pending Natural Gas Service Minimum Usage Agreement (Agreement) would protect Duke Kentucky's other customers from paying abandoned costs of any kind.

8. Refer to Duke Kentucky's response to Staff's First Request, Items 2(a) and 3(c). Confirm that the Distribution portion of the Incremental Customer Facilities includes the service lines. If this cannot be confirmed, explain.

9. Refer to Duke Kentucky's response to Staff's First Request, Item 2(b), in which Duke Kentucky states that if the application for a Certificate of Public Convenience and Necessity for the UL60 project in Case No. 2019-00388, were not approved, then Duke Kentucky would have to develop other solutions to support this customer and other customers in the area, which would result in a much more expensive project. Expound on why the project would be more expensive.

10. Refer to Duke Kentucky's response to Staff's First Request, Item 3(d). Provide the allocation percentage.

11. Refer to Duke Kentucky's response to Staff's First Request, Item 8. Explain why the customer would be able to defer the "lost opportunity," as defined in the Agreement, Section 5.6, to the subsequent year.

12. Refer to Duke Kentucky's response to Staff's First Request, Item 9, in which Duke Kentucky asserts that it performed a credit check and will not require a deposit from the Customer. Explain whether this is the process that Duke Kentucky utilizes for all similarly situated customers, and if not, provide a detailed explanation as to why not.

13. Refer to Duke Kentucky's response to Staff's First Request, Item 12, and Case No. 2019-00388, Duke Kentucky's response to Commission Staff's Second Request for Information, Item 4. Provide the estimated annual usage of the customer if different than the minimum usage requirements.



Kent A. Chandler
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Public Service Commission
P.O. Box 615
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DATED APR 02 2020

cc: Parties of Record

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