

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF DUKE)	
ENERGY KENTUCKY, INC. FOR APPROVAL)	CASE NO.
OF A SPECIAL CONTRACT AND FOR)	2021-00192
WAIVER OF 807 KAR 5:041, SECTION 6(2)(C))	

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 an electronic version of the following information. The information requested is due on August 27, 2021. The Commission directs Duke Kentucky to the Commission's July 22, 2021 Order in Case No. 2020-00085¹ regarding filings with the Commission. 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.

¹ Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC July 22, 2021), Order (in which the Commission ordered that for case filings made on and after March 16, 2020, filers are NOT required to file the original physical copies of the filings required by 807 KAR 5:001, Section 8).

Duke Kentucky shall make timely amendment to any prior response if Duke Kentucky obtains information that indicates 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 the Application, paragraph 9.
 - a. Provide the amount of time it takes for the pumps to reach normal operating levels.
 - b. Under normal circumstances, explain whether pump start-ups can be staggered to avoid voltage drops in excess of 4 percent on Wilder 46.
 - c. Since taking service with Duke Kentucky, provide the time and date of any instance where the startup of Northern Kentucky Water District's (NKWD) pumps have caused a voltage drop in excess of 4 percent on Wilder 46 in violation of 807 KAR 5:041, Section 6(2)(c).

2. Refer to the Application, paragraphs 10–12.
 - a. Describe all of the alternatives Duke Kentucky evaluated to alleviate the voltage drops on Wilder 46 caused by the initiation of NKWD’s water pumps.
 - b. State whether those alternatives included modifications to Duke Kentucky’s infrastructure, such as placing NKWD on a separate circuit or substation.
 - c. Provide any supporting cost projections or estimates associated with any alternatives that Duke Kentucky considered other than the special contract that is the subject of this matter.
3. Explain and quantify to what extent the special contract is expected to reduce voltage drops in excess of 4 percent on Wilder 46.
4. Refer to the Application in general. If Duke Kentucky and NKWD were to coordinate pump start-up times, explain whether the voltage on Wilder 46 can be temporarily increased to offset the effects of voltage drop from pump start-ups.



Linda C. Bridwell, PE
Executive Director
Public Service Commission
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DATED AUG 13 2021

cc: Parties of Record

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