

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF DUKE ENERGY)	CASE NO.
KENTUCKY, INC. FOR AN ADJUSTMENT TO)	2023-00413
RIDER NM RATES AND FOR TARIFF APPROVAL)	

COMMISSION STAFF'S POST-HEARING REQUEST FOR INFORMATION
TO DUKE ENERGY KENTUCKY, INC.

Duke Energy Kentucky, Inc. (Duke Kentucky), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due no later than June 7, 2024. 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 question to which the response is made and 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

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).

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 Duke Kentucky obtains information that indicates the response was incorrect or incomplete when made or, though correct or complete when made, is now incorrect or incomplete 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 and scanned 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 following information: Response to Kentucky Solar Energy Society and Kentuckians for the Commonwealth's Second Request for Information, Item 15; Response to Commission Staff's Third Request for Information, Item 9(b), Attachment from Case No. 2022-00372,² Supporting Documentation filed with Tariff Filings for

² Case No. 2022-00372, *Electronic Application of Duke Energy Kentucky, Inc for (1) An Adjustment of Electric Rates; (2) Approval of New Tariffs; (3) Approval of Accounting Practices to Establish Regulatory Assets and Liabilities; and (4) All Other Required Approvals and Relief* (filed Dec. 14, 2022).

Updated Cogeneration Tariffs approved May 18, 2024,³ and Avoided Capacity Cost Calculation used in Case No. 2022-00251.⁴ For each of the items referenced provide:

- a. Each input for each portion of the calculations;
- b. The creation date or source date for each input;
- c. The database or information used to formulate each input;
- d. If an input is an estimate, provide supporting documentation or workpapers for the estimate;
- e. If any assumptions were used to formulate the calculation, provide each assumption and any supporting documentation for the presumption; and
- f. The information used to support the cost calculation for and the description of the CT in each case.

2. Explain what department or business group at Duke Kentucky makes the determination to switch a customer from Net Metering Service I Rider (NM-1) to Net Metering Service Rider II (NM-2). If it is the decision of one individual within that department, provide that individual's name and title. Additionally, provide where that department or business group is located.

3. Explain what notification(s), if any, are required of a Duke Kentucky NM-1 customer materially increasing the size of their converter. Explain when each notification is required and the required contents of each notification. If no notice is required, explain

³ TFS2024-00182 (Ky. PSC April 18, 2024); the tariff was accepted for filing by the Commission by letter dated May 17, 2024.

⁴ Case No. 2022-00251, *Electronic Application of Duke Energy Kentucky, Inc. to Amend Its Demand Side Management Programs*.

why not and how Duke Kentucky receives notice that a NM-1 customer has increased their inverter capacity.

4. Confirm that a customer can increase their inverter capacity, as long as they don't exceed the amount approved in the initial interconnection study, without moving from NM-1 to NM-2. If not confirmed, explain why not.

5. Refer to PJM's September 1, 2023 Compliance Filing. Assuming that PJM's Tariff is approved by FERC, explain how NM-1 complies with the rules as set for in PJM's Tariff.

6. State whether Duke Kentucky reached out to [REDACTED] regarding the public comment submitted on April 24, 2024. If so, explain what discussions took place.

7. Provide a sample monthly bill under NM-2 and explain the differences between the ways the sample monthly bill under NM-2 is presented in comparison to a sample bill under NM-1.

8. Explain what changes would be necessary to allow a customer taking service under Advanced Meter Opt-Out Tariff to participate in NM-2. Specifically, cite to any changes Duke Kentucky would need to make in its billing system or its meter read system to accommodate the transition to NM-2.

9. Refer to Commission Staff's Fourth Request for Information, Item 5. Provide an updated list for all pending applicants of NM-1. In the response, identify any new applicants.

a. For this list, describe whether the installation is pending action(s) by the customer or within Duke Kentucky's processes for each project as well as the length of time the project has been at that stage.

b. Provide the average amount of time a customer waits on Duke Kentucky for installation purposes. In this, do not include the time that Duke Kentucky waits to hear back from the customer.

c. Explain whether Duke Kentucky updates customers on their application for service under NM-1. If so, describe that process. If not, explain how a customer can track their application.

10. State whether Duke Kentucky is currently using, or has plans to invest in, active network management (ANM) for import (i.e., load) and/or export (ANM is a type of flexible interconnection). If yes, provide detail on what Duke Kentucky is currently or planning to do with active network management. If not, explain whether Duke Kentucky has evaluated the functionality of ANM and provide any such analysis.

11. Provide the modeling inputs and outputs (i.e., results) from all of the capacity expansion and production cost modeling used to inform the NM 2 Rider and avoided cost excess generation credit proposal. Include in your response, but do not limit it to, a narrative explaining the assumptions, scenario used, and how they differ from recent Kentucky PSC filings.

 FVR

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DATED MAY 24 2024

cc: Parties of Record

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