

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 A 138-KV TRANSMISSION LINE)	2024-00158
AND ASSOCIATED FACILITIES IN BOONE)	
COUNTY)	

COMMISSION STAFF'S FIRST 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 on August 23, 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 Direct Testimony of Yanthi W. Boutwell (Boutwell Direct Testimony), page 3, lines 12-21 and page 4, lines 1-16 and Exhibit 8, Figure A-4. Provide a cross reference between Mr. Boutwell's testimony and the line segments depicted on Figure A-4.

2. Refer to the Boutwell Direct Testimony, page 20, lines 15-21 and Exhibit 8, Figure A-4. Explain whether this portion of the testimony corresponds in part to the line

segments 25, 26, and 27 in Figure A-4. If not, provide further explanation of which figure in the application corresponds to the referenced testimony.

3. Refer to the Application, Exhibit 8, Figures A-2 and A-4 and Exhibit 16. It appears that line segments 25, 26, and 27 represent the current path of the existing 69 kV line paralleling North Bend Road. If the preferred route is approved, confirm that this portion of the line will remain energized and tie into the proposed Litton Substation.

4. Refer to the Direct Testimony of Betsy Ewoldt (Ewoldt Direct Testimony), page 20, lines 14-23 and page 21, lines 1-4 and Exhibit 8, Figure A-4. The proposed East Kentucky Power Cooperative (EKPC) transmission line route is crossed by line segments 25 and 26 and by line segments 15 and 19. Explain why the additional potential cost that would be required by the line segments 25 and 26 would not also be required by line segments 15 and 19.

5. Refer to the Ewoldt Direct Testimony, Attachment BE-1, page 1. The cost study states that the new conductor will be 954ACSR45x7.

a. Explain whether this conductor is of the type that Duke Kentucky, or its regulated affiliates, is installing currently on new reconductoring projects.

b. Explain how 954ACSR45x7 conductor compares and contrasts with advanced conductors (conductors having composite cores).

c. Explain whether advanced conductors are widely available and whether Duke Kentucky or its regulated affiliates have installed any within any part of Duke Kentucky's transmission system. If so, identify the advanced conductor by both make and model as well as location of the installation.

6. Refer to the Ewoldt Direct Testimony, page 19, regarding “Class 5” cost estimates.

a. Define Class 5 cost estimates and explain what makes the project alternative cost estimates Class 5 estimates.

b. Explain the methodology used to create a Class 5 cost estimate.

c. Explain how the accuracy range of a Class 5 cost estimate is determined.

7. Refer to the Ewoldt Direct Testimony, page 17, regarding quantitative route scores and page 20, regarding issues with using line segments 25 and 26.

a. State the purpose of the quantitative scores since they are not proxies for cost and do not account for the issues that make line segments 25 and 26 undesirable.

b. Describe Duke Kentucky’s policy and method regarding how it balances quantitative scores and estimated cost to select a preferred route, i.e., what quantitative score differential would override what estimated cost differential or vice versa.

c. Explain how risk factors that could add to cost, such as the ones applicable to line segments 25 and 26, influence the selection policy and method used to choose a preferred route.

8. Refer to the Ewoldt Direct Testimony, pages 20-21 regarding comparisons between Route L and Route R.

a. Confirm that the only difference between Route L and Route R is that Route L uses segments 7 and 13, while Route R instead uses segments 6 and 9.

b. State whether the comparison between Route L and Route R in Ewoldt Direct Testimony, page 21, lines 9-21, describe the differences between segments 7 and 13 contrasted with segments 6 and 9.

c. Identify any other differences between segments 7 and 13 contrasted with segments 6 and 9.



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DATED AUG 08 2024

cc: Parties of Record

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