

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF DUKE ENERGY )	
KENTUCKY, INC. TO BECOME A FULL )	
PARTICIPANT IN THE PJM INTERCONNECTION )	CASE NO.
LLC, BASE RESIDUAL AND INCREMENTAL )	2024-00285
AUCTION CONSTRUCT FOR THE 2027/2028 )	
DELIVERY YEAR AND FOR NECESSARY )	
ACCOUNTING AND TARIFF CHANGES )	

COMMISSION STAFF'S SECOND 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 November 15, 2024. The Commission directs Duke Kentucky to the Commission's July 22, 2021 Order in Case No. 2020-00085<sup>1</sup> 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

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<sup>1</sup> 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).

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 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 John Swez Direct Testimony at 36. State whether Duke Kentucky is currently in negotiations or communication with any potential large industrial customers, including but not limited to a data center or large factory, planning to locate within its service territory.

2. Refer to Duke Kentucky's response to Commission Staff's First Request for Information (Staff's First Request), Item 1. Provide what the PJM reserve requirement for RPM participants for each of the past five years.

3. Refer to Duke Kentucky's response to Staff's First Request, Item 8.

a. State how much excess capacity, if any, has Duke Kentucky sold into the RPM market each of the past five years. Include as part of the answer a detailed list of each sale and the amount of capacity sold.

b. State how much excess capacity, if any, has Duke Kentucky sold to parties external to PJM or another FRR entity for each of the past five years. Include as part of the answer a detailed list of each sale and the amount of capacity sold.

4. Refer to Duke Kentucky's response to the Attorney General's First Request for Information (Attorney General's First Request), Item 1, Attachment at 14 of 16. State whether any party with which Duke Kentucky has, or had, a firm unit specific bilateral contract has experienced capacity performance issues resulting in Duke Kentucky to have a capacity shortfall. Provide a detailed explanation of each incident.

5. Refer to Duke Kentucky's response to the Attorney General's First Request, Item 1e. Provide the previous analysis performed by Duke Kentucky, or any summaries or analyses, in which Duke Kentucky determined to remain in the FRR.



Linda C. Bridwell, PE  
Executive Director  
Public Service Commission  
P.O. Box 615  
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DATED NOV 01 2024

cc: Parties of Record

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