## COMMONWEALTH OF KENTUCKY

## BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF DUKE ENERGY	)	
KENTUCKY, INC. FOR APPROVAL OF A	)	CASE NO.
SPECIAL CONTRACT AND FOR WAIVER OF 807	)	2025-00054
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, shall file with the Commission an electronic version of the following information. The information requested is due on September 5, 2025. 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 person supervising the preparation of the response on behalf of the entity that the

<sup>&</sup>lt;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).

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 filling 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 Case No. 2021-00192.<sup>2</sup>
- a. Provide an updated cost estimate for the construction of the substation described by Duke Kentucky as Substation Solution #1, "a smaller substation

<sup>&</sup>lt;sup>2</sup> Case No. 2021-00192, *Electronic Application of Duke Energy Kentucky, Inc. for Approval of a Special Contract and for Waiver of 807 KAR 5:041, Section 6(2)(c)* (filed Aug. 27, 2021), Duke Kentucky's Response to Commission Staff's First Request for Information, Item 2(c), and (filed Jan. 14, 2022), Duke Kentucky's Response to Commission Staff's Second Request for Information, Item 3(a).

with a single transformer that would be solely for [Northern Kentucky Water District]

NKWD load and which would be owned and operated by them."

- b. Provide the estimated annual operations and maintenance cost of a potential substation described by Duke Kentucky as Substation Solution #1.
- c. Provide the expected useful life of a potential substation described by Duke Kentucky as Substation Solution #1.
- d. Explain whether Substation Solution #1 would be expected to resolve the voltage drop problem for customers other than Northern Kentucky Water District (Northern Kentucky District).
- e. Explain whether Substation Solution #1 would be expected to resolve the voltage drop problem for Northern Kentucky District.
- f. Explain what hazards or other effects the voltage drop, if any, might create for Northern Kentucky District.
- g. Explain what hazards or other effects the voltage drop, if any, might create for customers other than Northern Kentucky District.
- 2. Identify any customer complaints related to voltage drop on the affected circuit and provide any documentation of these complaints.
- 3. Refer to the special contract.<sup>3</sup> Identify all instances in which Northern Kentucky District has started a pump outside of permitted hours under the emergency provision of the special contract.

<sup>&</sup>lt;sup>3</sup> Case No. 2021-00192, Application (filed June 6, 2021), Attachment 2 at 2.

4. Refer to Duke Kentucky's deviation from 807 KAR 5:041, Section 6(2)(a) and (c). Explain what Duke Kentucky asserts Duke Kentucky and Northern Kentucky District's individual duties are if the deviation from 807 KAR 5:041, Section 6(2)(a) and (c) terminates.

Linda C. Bridwell, PE Executive Director

Public Service Commission

P.O. Box 615

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DATED \_\_\_\_ AUG 12 2025

cc: Parties of Record

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