

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF DUKE ENERGY)	
KENTUCKY, INC. FOR AN ADJUSTMENT TO)	CASE NO.
RIDER NM II RATES AND FOR TARIFF)	2025-00258
APPROVAL)	

COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
TO DUKE 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 October 15, 2025. 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 Bruce Sailors (Sailors Direct Testimony), page 4, table 1.

- a. Provide how many Net-Metering-2 (NM-2) participants are part of the residential class.

b. Provide how many NM-2 participants are part of the non-residential class. For this response, also provide a breakdown listing identifying the customer class in which each customer participates.

c. Provide how many queued NM-2 customers are part of the residential class.

d. Provide how many queued NM-2 customers are part of the non-residential class. For this response, also provide a breakdown listing identifying the customer class in which each customer participates.

2. Refer to Sailors Direct Testimony, page 7. Explain how Duke Kentucky's billing will be impacted by the move from two customer classes to one.

3. Explain whether any NM-2 customers also utilize battery storage. If so, provide a breakdown of net-metering customers with battery.

4. Refer to Sailors Direct Testimony, page 2, line 18 through page 3, line 17. Explain if Duke Kentucky has plans to update the avoided cost rate on a regular basis in response to changing input assumptions.

a. If so, explain how frequently Duke Kentucky plans to file to update the rate.

b. If Duke Kentucky does not plan to update the avoided cost rate in response to changing input assumptions on a regular basis, why explain why not.

5. Refer to the Direct Testimony of Dominic "Nick" J. Melillo (Melillo Direct Testimony), generally.

a. Explain how Duke Kentucky determined the capital and operating and maintenance (O&M) cost specific to transmission and distribution (T&D) capacity.

b. Provide all calculations, workpapers, and assumptions used in determining the portion of capital cost specific to capacity expansion. Workpapers should be in original format if in Excel, with all formulas, rows, and columns unprotected and fully accessible.

c. Explain if any customer Contribution In Aid of Construction (CIAC) payments were netted out of this cost of capacity expansion.

6. Refer to Sailers Direct Testimony, page 11, line 16 through page 12, line 2.

a. Explain why it is appropriate to use Effective Load Carrying Capability (ELCC), a metric calculated by PJM specific to generation, for transmission and distribution avoided costs.

b. Provide the peak hour (day and time), and peak load in that hour, for the transmission and distribution system in each month for the past three years.

c. Explain if the monthly peak hour on the distribution system varies across feeders where the majority of load is comprised of commercial customers as compared to feeders where the majority of load is comprised of residential customers.

d. Describe the difference in distribution system peak hours between majority commercial and majority residential customers quantitatively, if possible, or qualitatively, if quantitative data is unavailable.

7. Refer to Sailers Direct Testimony, Public Attachment BLS-1, page 6.

a. Confirm that the 0.639 percent in Transmission Losses and the 4.304 percent in Distribution Losses is an annual average. If confirmed, provide the source of those figures. If not confirmed, indicate the period of time the losses are calculated over and provide the calculation, including any inputs and assumptions used.

b. Provide any monthly or hourly energy loss values for Duke Kentucky's transmission and/or distribution system in Duke Kentucky's possession.

8. Refer to the Direct Testimony of John D. Swez (Swez Direct Testimony), page 18, line 17 through page 19, line 18.

a. Explain why Duke Kentucky is unable to calculate the impact on PJM Billing Line Items charges or credits from behind the meter solar.

b. Explain whether Duke Kentucky requested the information regarding its billing determinants and billing rates for the Billing Line Items from PJM.

c. Provide the last 12 months of PJM bills related to Duke Kentucky. Provide a detailed explanation of the billing determinants and rates and how they are determined.

9. Refer to the Sailors Direct Testimony, Confidential Attachment BLS-1, Energy Inputs tab. Provide the PV Watts input assumptions used to generate the solar load profile, including the DC System Size (kW); Module Type; Array Type; System Losses; Tilt angle; Azimuth; and inverter efficiency.

10. Refer to Sailors Direct Testimony, page 4, Table 1: Net Metering Participation. Provide any solar production data from the 1,005 net metering participants shown and provide either annual solar production by customer (indicating which rate class each customer is billed under), or an annual average by rate class, indicating the number of customers included in each average.

Linda Bridwell RP

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DATED **SEP 29 2025**

cc: Parties of Record

Case No. 2025-00258

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