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Rocco.O.D'Ascenzo@duke-energy.com Rocco O. D'Ascenzo Deputy General Counsel

March 29, 2018

# VIA OVERNIGHT DELIVERY

Ms. Gwen R. Pinson Executive Director Kentucky Public Service Commission 211 Sower Blvd Frankfort, KY 40601 RECEIVED

MAR 3 0 2018

PUBLIC SERVICE COMMISSION

RE: Administrative Case No. 387 - Annual Load/Demand Forecast Report

Dear Ms. Pinson:

Enclosed please find the 2017 updated responses to the Commission data requests filed annually, as ordered in Administrative Case No. 387, paragraph 2, dated October 7, 2005. These updated responses are being filed separately from the Annual Reporting of Duke Energy Kentucky upon request.

We have included the unredacted and highlighted responses in a separate envelope to be filed under seal. Also enclosed is a Petition for Confidential Treatment for your consideration in the above referenced matter.

Please date-stamp the two copies of the letter and data requests and return to me in the enclosed envelope. Should you have any questions or concerns, please do not hesitate to contact me.

Sincerely,

Rocco D'Ascenzo

Deputy General Counsel

Enclosures

# RECEIVED

MAR 3 0 2018

# COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

PUBLIC SERVICE COMMISSION

A Review of The Adequacy of	)	
Kentucky's Generation Capacity and	)	Administrative
Transmission System	)	Case No. 387

# DUKE ENERGY KENTUCKY, INC.'S PETITION FOR THE CONFIDENTIAL TREATMENT OF INFORMATION FILED FOR CALENDAR YEAR 2018

- 1. Duke Energy Kentucky, Inc. (Duke Energy Kentucky or Company), pursuant to 807 KAR 5:001, Section 13, respectfully requests the Commission to classify and protect certain information provided by Duke Energy Kentucky in its response to Data Request No. 11, as requested by Commission Staff (Staff). The information that Staff seeks, and for which Duke Energy Kentucky now seeks confidential treatment (Confidential Information), includes planned outage and retirement schedules by plant. In support of this Motion, Duke Energy Kentucky further states:
- 1. The Kentucky Open Records Act exempts from disclosure certain commercial information. KRS 61.878(1)(c). To qualify for this exemption and, therefore, maintain the confidentiality of the information, a party must establish that disclosure of the commercial information would permit an unfair advantage to competitors of that party. Public disclosure of the information identified herein would, in fact, prompt such a result for the reasons set forth below.
- 2. The list of projected outages, as contained in response to Data Request No. 11, will grant vendors a distinct advantage in that they would be able to anticipate Duke Energy

Kentucky's maintenance schedules. Duke Energy Kentucky submits that the following information, if openly disclosed, could present antitrust issues by giving its competitors access to competitively sensitive, confidential information, which in turn could cause energy prices to consumers to be above competitive rates, and would permit competitors of Duke Energy Kentucky to gain an unfair competitive advantage in the marketplace:

- a. Scheduled outages or retirements of generating capacity during the current year and the following four years.
- 3. The information for which Duke Energy Kentucky is seeking confidential treatment is not known outside of Duke Energy Corporation.
- 4. Duke Energy Kentucky does not object to limited disclosure of the confidential information described herein, pursuant to an acceptable protective agreement, to the Attorney General or other intervenors with a legitimate interest in reviewing the same for the purpose of participating in this case.
- 5. This information was, and remains, integral to Duke Energy Kentucky's effective execution of business decisions and such information is generally regarded as confidential or proprietary. Indeed, as the Kentucky Supreme Court has found, "information concerning the inner workings of a corporation is 'generally accepted as confidential or proprietary." Hoy v. Kentucky Industrial Revitalization Authority, 904 S.W.2d 766, 768 (Ky. 1995).
- 6. In accordance with the provisions of 807 KAR 5:001, Section 13(3), the Company is filing one copy of the Confidential Information separately under seal, and one copy without the confidential information included.
- 7. Duke Energy Kentucky respectfully requests that the Confidential Information be withheld from public disclosure for a period of ten years. This will assure that the Confidential

Information – if disclosed after that time – will no longer be commercially sensitive so as to likely impair the interests of the Company or its customers if publicly disclosed.

8. To the extent the Confidential information becomes generally available to the public, whether through filings required by other agencies or otherwise, Duke Energy Kentucky will notify the Commission and have its confidential status removed, pursuant to 807 KAR 5:001 Section 13(10)(a).

WHEREFORE, Duke Energy Kentucky, Inc., respectfully requests that the Commission classify and protect as confidential the specific information described herein.

Respectfully submitted,

DUKE ENERGY KENTUCKY, INC.

Rocco D'Ascenzo (92796)
Deputy General Counsel

139 East Fourth Street, 1303-Main

Cincinnati, Ohio 45202 Phone: (513) 287-4320 Fax: (513) 287-4385

E-mail: <u>rocco.d'ascenzo@duke-energy.com</u> Counsel for Duke Energy Kentucky, Inc.

# **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing filing was served on the following via overnight mail, this 27th day of March 2018.

Rocco D'Ascenzo

Rebecca W. Goodman The Office of the Attorney General Utility Intervention and Rate Division 700 Capital Avenue, Suite 20 Frankfort, Kentucky 40601

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STATE OF OHIO	)	
	)	SS:
COUNTY OF HAMILTON	)	

The undersigned, Tim Abbott, being duly sworn, deposes and says that he is the Director of System Operations Services, and that he has personal knowledge of the matters set forth in the foregoing data requests, and that the answers contained therein are true and correct to the best of his knowledge, information and belief.

Tim Abbott, Affiant

Subscribed and sworn to before me by Tim Abbott, on this 21 day of March, 2018.

ADELE M. FRISCH Notary Public, State of Ohio My Commission Expires 01-05-2019 NOTARY PUBLIC

My Commission Expires: 1 | 5 | 2019

STATE OF OHIO	)	
	)	SS:
COUNTY OF HAMILTON	)	

The undersigned, Ed Kirschner, Director Transmission Planning, being duly sworn, deposes and says that he has personal knowledge of the matters set forth in the foregoing data requests, and that the answers contained therein are true and correct to the best of his knowledge, information and belief.

Ed Kirschner, Affiant

Subscribed and sworn to before me by Ed Kirschner on this \_\_\_\_ day of March, 2018.

My Commission Expires: John 8,2027

E. MINNA ROLFES-ADKINS
Notary Public, State of Ohio
My Commission Expires
July 8, 2022

STATE OF NORTH CAROLINA	)	
	)	SS:
COUNTY OF MECKLENBURG	)	

The undersigned, Scott Park, being duly sworn, deposes and says that he is the Director of Integrated Resource Planning & Analytics - Midwest, and that he has personal knowledge of the matters set forth in the foregoing data requests, and that the answers contained therein are true and correct to the best of his knowledge, information and belief.

Scott Park, Afffant

Subscribed and sworn to before me by Scott Park, on this and day of Hebruary, 2018.

NOTARY PUBLIC

My Commission Expires: Oct. 20, 2018

STATE OF NORTH CAROLINA	)	
	)	SS:
COUNTY OF MECKLENBURG	)	

The undersigned, John D. Swez, Director of General Dispatch & Operations, Power Trading and Dispatch, being duly sworn, deposes and says that he has personal knowledge of the matters set forth in the foregoing data requests, and that the answers contained therein are true and correct to the best of his knowledge, information and belief.

John D. Swez, Affiant

Subscribed and sworn to before me by John D. Swez on this 27th day of March, 2018.

NOTARY PUBLIC

My Commission Expires:

MARY B VICKNAIR
NOTARY PUBLIC
Davie County
North Carolina
My Commission Expires Sept. 21, 2022

STATE OF NORTH CAROLINA	)	
	)	SS:
COUNTY OF MECKLENBURG	)	

The undersigned, Benjamin Passty, Lead Load Forecasting Analyst, being duly sworn, deposes and says that he has personal knowledge of the matters set forth in the foregoing data requests, and that the answers contained therein are true and correct to the best of his knowledge, information and belief.

Benjamin Passty, Affiant

Subscribed and sworn to before me by Benjamin Passty on this <u>15</u> day of March, 2018.

PATRICIA C. ROSS NOTARY PUBLIC Mecklenburg County North Carolina

NOTARY PUBLIC

My Commission Expires: 10-17-2019

Duke Energy Kentucky Administrative Case No. 387 March 31, 2018

**STAFF-DR-01-003** 

# **REQUEST:**

Actual and weather-normalized monthly coincident peak demands for the just completed calendar year. Demands should be disaggregated into (a) native load demand (firm and non-firm) and (b) off-system demand (firm and non-firm).

# **RESPONSE:**

Duke Energy Kentucky Electric Energy Demands - MW						
	1	2	3 = 1 + 2	4	5	6 = 3 + 5
				Weather		
	Native	Demand	internal	Normal Internal	Off-System	ĺ
	Peak	Response <sup>1</sup>	Peak	Peak	Non-Firm	Total
Jan-17	708		708	713		713
Feb-17	645		645	664		664
Mar-17	663		663	637		637
Apr-17	607		607	569		569
May-17	722		722	735		735
Jun-17	799		799	804		804
 Jul-17	831	10	841	861		861
Aug-17	834		834	849		849
Sep-17	764	10	774	803		803
Oct-17	629		629	599		599
Nov-17	586		586	572		572
Dec-17	706		706	672		672

**PERSON RESPONSIBLE:** Benjamin Passty

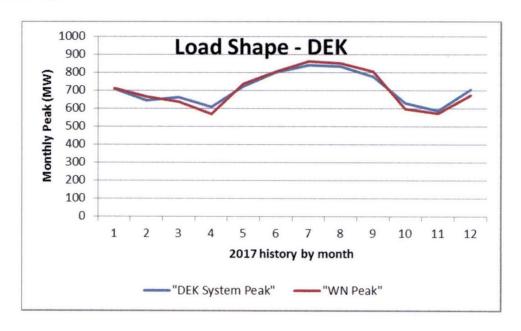
Duke Energy Kentucky Administrative Case No. 387 March 31, 2018

STAFF-DR-01-004

# **REQUEST:**

Load shape curves that show actual peak demands and weather-normalized peak demands (native load demand and total demand) on a monthly basis for the just completed calendar year.

## **RESPONSE:**



PERSON RESPONSIBLE:

Benjamin Passty

**STAFF-DR-01-006** 

# **REQUEST:**

Based on the most recent demand forecast, the base case demand and energy forecasts and high case demand and energy forecasts and high case demand and energy forecasts for the current year and the following four years. The information should be disaggregated into (a) native load (firm and non-firm demand) and (b) off-system load (both firm and non-firm demand).

#### **RESPONSE:**

Duke Energy Kentucky - Native Load Forecast				
	Deman	d – MW	Energy -	- GWH
_	Base	High	Base	High
2018	847	932	4,025	4,378
2019	852	938	4,043	4,414
2020	857	944	4,065	4,446
2021	862	949	4,084	4,473
2022	867	954	4,084	4,473

Duke Energy Kentucky – Non-Firm Electric Forecast				
	Demand	Demand – MW		- MWH
	Base	High	Base	High
2018	n/a	n/a	n/a	n/a
2019	n/a	n/a	n/a	n/a
2020	n/a	n/a	n/a	n/a
2021	n/a	n/a	n/a	n/a
2022	n/a	n/a	n/a	n/a

PERSON RESPONSIBLE:

Benjamin Passty

Duke Energy Kentucky Administrative Case No. 387

March 31, 2018

**STAFF-DR-01-007** 

**REQUEST:** 

The target reserve margin currently used for planning purposes, stated as a percentage of

demand. If changed from what was in use in 2001, include a detailed explanation for the

change.

**RESPONSE:** 

As in 2017, Duke Energy Kentucky will use a planning reserve margin of 14.5%. Duke

Energy Kentucky plans for a prudent long term target reserve margin (typically in the

13%-17% range). But as a participant in PJM, Duke Energy Kentucky must also satisfy a

separate PJM prescribed reserve margin requirement as part of its near-term RTO wide

capacity planning. These two requirements while similar in name and concept are not

precisely the same metric nor are they calculated the same way.

PERSON RESPONSIBLE:

Scott Park

1

Duke Energy Kentucky Administrative Case No. 387 March 31, 2018

**STAFF-DR-01-008** 

## **REQUEST:**

Projected reserve margins stated in megawatts and as a percentage of demand for the current year and the following 4 years. Identify projected deficits and current plans for addressing these. For each year identify the level of firm capacity purchases projected to meet native load demand.

#### **RESPONSE:**

For purposes of being clear, projected reserve margins will be calculated as follows:

Reserve Margin (MW) = Generating Capacity – Peak Demand – Demand Response

Reserve Margin (%) = (Generating Capacity / (Peak Demand – Demand Response)) - 1

Year	Projected	Projected Reserve
	Reserves (MW)	Margin (%)
2010	254	210/
2018	254	31%
2019	250	30%
2020	233	27%
2021	228	27%
2022	223	26%

This data reflects the Spring 2018 Load Forecast and addition of 7 MW of solar to the DEK generating fleet. The current fleet consists of the 600 MW East Bend 2 and 476 MW Woodsdale generating stations plus 7 MW solar.

**PERSON RESPONSIBLE:** Scott Park

1

# **PUBLIC STAFF-DR-01-011**

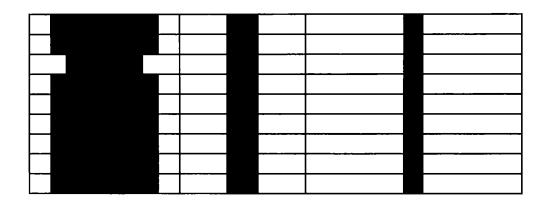
# **REQUEST:**

A list that identifies scheduled outages or retirements of generating capacity during the current year and the following four years.

# **RESPONSE:**

# CONFIDENTIAL PROPRIETARY TRADE SECRET

Unit Name	Year	Duration (Weeks)
OHIOT NAME	T Cur	Duranton (11 bons)
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PERSON RESPONSIBLE:

John Swez

Duke Energy Kentucky Administrative Case No. 387

March 31, 2018

**STAFF-DR-01-012** 

**REQUEST:** 

Identify all planned base load or peaking capacity additions to meet native load

requirements over the next 10 years. Show the expected in-service date, size and site for

all planned additions. Include additions planned by the utility, as well as those by

affiliates, if constructed in Kentucky or intended to meet load in Kentucky.

**RESPONSE:** 

There are currently no planned base load or peaking capacity additions needed to meet

native load requirements over the next 10 years.

PERSON RESPONSIBLE:

Scott Park

1

#### **STAFF-DR-01-013**

## **REQUEST:**

The following transmission energy data for the just completed calendar year and the forecast for the current year and the following four years:

- a. Total energy received from all interconnections and generation sources connected to the transmission system.
- b. Total energy delivered to all interconnections on the transmission system.
- c. Peak load capacity of the transmission system.
- d. Peak demand for summer and winter seasons on the transmission system.

#### **RESPONSE:**

a.

Year	Month	Total Energy Received	
2017	January	383,521	
	February	323,829	
	March	354,556	
	Aprll	316,975	
	May	351,419	
	June	394,301	
	July	439,895	
	August	414,892	
	September	352,525	
	October	329,265	
	November	336,118	
	December	397,674	
2017 Total		4,394,970	

b. There were 214,108 MWh delivered to the transmission system from DEK.

c. Neither Duke Energy Kentucky nor the electric utility industry has defined a term "peak load capacity of the transmission system." There is no single number that defines the capacity of a transmission system due to the interconnected nature of the electric grid. Duke Energy Kentucky does perform assessments of its transmission system to ensure all firm loads can be served in a reliable manner. This ensures that the transmission system has the capacity required to reliably serve the load.

#### d. SUMMER PEAK

Date	Hour	MW's
August 17, 2017	14	834

# WINTER PEAK

Date	Hour	MW's
January 6, 2017	19	708

PERSON RESPONSIBLE:

a, b – Tim Abbott

c - Ed Kirschner

d – Tim Abbott

Duke Energy Kentucky Administrative Case No. 387

March 31, 2018

**STAFF-DR-01-014** 

**REQUEST:** 

Identify all planned transmission capacity additions for the next 10 years. Include the

expected in-service date, size and site for all planned additions and identify the

transmission need each addition is intended to address.

**RESPONSE:** 

There are no transmission capacity additions planned at this time.

PERSON RESPONSIBLE:

Ed Kirschner

1