



Heather M. Horne  
Associate General Counsel

Duke Energy Corporation  
1301 Pennsylvania Ave. NW, Ste. 200  
Washington, DC 20004

☎: 202-824-8009  
heather.horne@duke-energy.com

**CONTAINS REQUEST FOR CONFIDENTIAL TREATMENT**

May 15, 2020

Kimberly D. Bose, Secretary  
Federal Energy Regulatory Commission  
888 First Street, N.E.  
Washington, D.C. 20426

Re: Duke Energy Ohio, Inc., and Duke Energy Kentucky, Inc.  
Formula Rate Annual Update  
Docket No. ER12-91-000

Dear Secretary Bose:

In accordance with Section 1(b)(ii) of Duke Energy Ohio, Inc.'s ("DEO") and Duke Energy Kentucky, Inc.'s ("DEK") Formula Rate Implementation Protocols ("Protocols"), which appear as Attachment H-22A of PJM Interconnection, L.L.C.'s ("PJM") Open Access Transmission Tariff ("OATT"), DEO and DEK (together, "DEOK" or "the Companies") submit the enclosed Formula Rate Annual Update. In accordance with the Companies' Formula Rate Implementation Protocols, the Annual Update is submitted for informational purposes only, and is not a filing under Section 205 of the Federal Power Act. **The Companies request that the Commission not act on or issue public notice of this informational filing because the Formula Rate Implementation Protocols provide specific procedures for notice, review, and challenges to the Annual Updates.**

Attached to this filing letter are the following:

- DEOK's OATT formula rate template populated with the latest DEOK FERC Form No. 1 data for rates effective June 1, 2020 (in Excel and PDF form);<sup>1</sup>
- PBOP support reports and worksheets: (1) the actuarial valuation reports supporting the derivation of Postretirement Benefits Other than Pensions ("PBOP") expense;<sup>2</sup> (2) FAS112 Summary; and (3) Purchase Accounting Support workpaper; and
- Form of protective agreement.

<sup>1</sup> Protocols, Section 1.b.(i).

<sup>2</sup> "CUI.PRIV Duke Energy 2019 Postemployment Welfare (ASC 712) Report DEOK" and "CUI.PRIV Duke Energy – Year End 2019 Disclosure and Fiscal 2020 Cost – Ohio and Kentucky." The actuarial valuation reports and worksheets have been included pursuant to the DEOK OATT, page 5, Note E.

DEOK is contemporaneously submitting an Order No. 864 Compliance Filing proposing populated worksheets applicable to Tax Cuts and Jobs Act-related excess and deficient ADIT balances, with a requested effective date of January 27, 2020. DEOK stated its intent in that filing to include the proposed revisions in this Annual Update, and it has done so here. Should the Commission order any changes to the proposed revisions that require a change to this Annual Update, DEOK will resubmit the Annual Update.

The attached files “CUI.PRIV Duke Energy 2019 Postemployment Welfare (ASC 712) Report DEOK” and “CUI.PRIV Duke Energy – Year End 2019 Disclosure and Fiscal 2020 Cost – Ohio and Kentucky” have been labeled “CUI//PRIV—Protected Materials” because they contain competitively sensitive information that “may be provided only to those persons bound by the terms of a suitable confidentiality agreement or protective order.”<sup>3</sup> In accordance with the Commission’s regulations, DEOK submits unredacted versions of the attachments, which have been marked “**CUI//PRIV – PROTECTED MATERIALS – DO NOT RELEASE,**” redacted versions with the confidential information removed, and a proposed form of protective agreement.<sup>4</sup> Interested parties desiring the unredacted versions of these documents should contact the undersigned and provide an executed protective agreement for the 2020 Annual Update (see form of protective agreement attached hereto).

Please contact the undersigned if you have any questions.

Respectfully submitted,  
*/s/ Heather M. Horne*

Heather M. Horne  
Associate General Counsel  
Duke Energy Corporation  
1301 Pennsylvania Ave., NW  
Suite 200  
Washington, DC 20004  
Phone: 202.824.8009  
Heather.Horne@duke-energy.com

---

<sup>3</sup> Protocols, Section 1.g.(iii).

<sup>4</sup> *Notice of Document Labelling Guidance for Documents Submitted to or Filed with the Commission or Commission Staff*, 82 Fed. Reg. 18632 (Apr. 20, 2017); 18 C.F.R. § 388.112(b)(2)(i).

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated at Washington, DC, this 15<sup>th</sup> day of May, 2020.

*/s/ Heather M. Horne* \_\_\_\_\_

Heather M. Horne  
Associate General Counsel  
Duke Energy Corporation