CAC
IURC Cause No. 38707-FAC123 S1
Data Request Set No. 12
Received: September 4, 2020

CAC 12.1

Request:

Refer to Mr. Swez's Rebuttal testimony at p. 35 line 27 through p. 36 line 8.

a. Identify the number of hours that the Wheatland plant operated during the FAC 123 and FAC 124 reconciliation periods.
b. Identify the number of hours that the Vermillion plant operated during the FAC 123 and FAC 124 reconciliation periods.
c. Identify in dth/day the natural gas needs for the Wheatland plant.
d. Identify in dth/day the natural gas needs for the Vermillion plant.
e. Identify and produce any analysis or study of the impact on the cost of natural gas for any of the Edwardsport, Wheatland, and/or Vermillion plants if Edwardsport were to switch to 100% natural gas operation.

Objection:

Duke Energy Indiana objects to this request as neither relevant nor admissible to the extent it seeks information outside of the FAC 123 time period.

Response:

Subject to and without waiving or limiting its objections, Duke Energy Indiana responds as follows:

a. and b. Please see the table below for responses to a and b, number of operating hours that the Wheatland and Vermillion plants were operational for each period; FAC 123 period is Sep-Nov 2019, FAC 124 is Dec 2019, Jan-Feb 2020.

Month	Wheatland	Vermillion
Sep-19	77	57
Oct-19	55	45
Nov-19	20	27
Dec-19	19	14
Jan-20	99	24
Feb-20	21	3

c. The number of hours of operation during the day was not stated. In addition, the operating level (MW) was not stated. Thus, for this response, the assumption was made that the unit operated 24 hours per day at full load.

   Using the units winter capability of 122 MW, a full load average heat rate of 11,379 Btu/KWh, and 4 units, the maximum daily dth/day natural gas need for Wheatland plant is:
   = 4 x 122 MW x 11,379 Btu/kWh x 1000 kw/MW x 1 dth / 1,000,000 Btu x 24 hr/day
   = 133,271 dth/day

d. The number of hours of operation during the day was not stated. In addition, the operating level (MW) was not stated. Thus, for this response, the assumption was made that the unit operated 24 hours per day at full load.

   Using the units winter capability of 89 MW, a full load average heat rate of 11,752 Btu/KWh, and 8 units, the maximum daily dth/day natural gas need for Wheatland plant is:
   = 8 x 89 MW x 11,752 Btu/kWh x 1000 kw/MW x 1 dth / 1,000,000 Btu x 24 hr/day
   = 200,818 dth/day

e. The Company is not aware of nor has no such analysis or study aside from what is discussed in the direct and rebuttal testimony of John Swez in this proceeding and previous FAC proceedings.

Witness: John Swez