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**CONTAINS REQUEST FOR CONFIDENTIAL TREATMENT**

May 15, 2025

Debbie-Anne Reese, Secretary Federal  
Energy Regulatory Commission 888 First  
Street, N.E.  
Washington, D.C. 20426

Re: Duke Energy Ohio, Inc., and Duke Energy Kentucky, Inc.  
2025 Formula Rate Annual Update  
Docket No. ER12-91-000

Dear Secretary Reese:

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, 2025 (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 2024 Duke Energy Duke Energy, Ohio, Inc. & Duke Energy Kentucky, Inc. DEOK Actuarial Valuation Report" and "CUI.PRIV 2024 Duke Energy Ohio, Inc. & Duke Energy Kentucky, Inc. DEOK Post-employment Welfare Benefits." The actuarial valuation reports and worksheets have been included pursuant to the DEOK OATT, page 5, Note E.

In Docket No. RM19-12 FERC updated XBRL taxonomies related to the FERC Form No. 1. Pursuant to the DEOK Protocols, which require that the formula rate be reconcilable to the FERC Form No. 1,<sup>3</sup> page 3 of the populated template includes a notation that the prior FERC Form No. 1 reference to 263.i was changed to 263.l in the new XBRL format. DEOK has reconciled its populated template to the new Form No. 1 XBRL format by specifically noting where the correct XBRL input has been used to populate the formula rate.

The attached files “CUI.PRIV 2024 Duke Energy Ohio, Inc. & Duke Energy Kentucky, Inc. DEOK Actuarial Valuation Report” and “CUI.PRIV 2024 Duke Energy Ohio, Inc. & Duke Energy Kentucky, Inc. DEOK Post-employment Welfare Benefits” 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>4</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>5</sup> Interested parties desiring the unredacted versions of these documents should contact the undersigned to: (1) provide an executed protective agreement for this proceeding;<sup>6</sup> and execute a third-party release form from Willis Towers Watson, which the undersigned will provide.<sup>7</sup>

Please contact the undersigned if you have any questions.

Respectfully submitted,  
/s/ Heather M. Horne

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<sup>3</sup> Protocols, Section 1.g, note 2.

<sup>4</sup> Protocols, Section 1.g.(iii).

<sup>5</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).

<sup>6</sup> See form of protective agreement attached hereto. Parties who have already executed the protective agreement for this docket should so advise the undersigned.

<sup>7</sup> Parties who have already executed a third-party release should so advise the undersigned.

### **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 15th day of May, 2025.

/s/ Marilani Alt

Marilani Alt  
FERC Compliance Analyst  
Duke Energy Corporation