DUKE ENERGY CORPORATION

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VIA HAND DELIVERY

April 27, 2012

Mr. Jeff Derouen
Executive Director
Kentucky Public Service Commission
211 Sower Blvd
Frankfort, KY 40601

Re: Case No. 2012-00085
In the Matter of the Application of Duke Energy Kentucky, Inc., for an Energy Efficiency Cost Recovery Mechanism and for Approval of Additional Programs for Inclusion in its Existing Portfolio

Dear Mr. Derouen:

Enclosed please find an original and twelve copies of the Responses of Duke Energy Kentucky, Inc. to Commission Staff's First Set of Data Requests and Petition for Confidential Treatment in the above captioned case. Also enclosed in the white envelope is one set of the confidential responses being filed under seal.

Please date-stamp the two copies of the letter and the Petition and return to me in the enclosed envelope.

Sincerely,

Kristen Cocanougher

Kristen Cocanougher

cc: Jennifer Hans (w/enclosures)
Richard Raff (w/enclosures)
Florence W. Tandy (w/enclosures)
Carl Melcher (w/enclosures)

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of the Application of Duke Energy Kentucky, Inc., for an Energy Efficiency Cost Recovery Mechanism and for Approval of Additional Programs for Inclusion in its Existing Portfolio	)))))	Case No. 2012-00085

PETITION OF DUKE ENERGY KENTUCKY, INC. FOR CONFIDENTIAL TREATMENT OF INFORMATION CONTAINED IN ITS RESPONSE TO COMMISSION STAFF'S FIRST SET OF DATA REQUESTS

Duke Energy Kentucky, Inc. (Duke Energy Kentucky or Company), pursuant to 807 KAR 5:001, Section 7, respectfully requests the Commission to classify and protect certain information provided by Duke Energy Kentucky in its response to data request Nos. 11, 12 and 25, as requested by Commission Staff (Staff) in this case on April 13, 2012. The information that Staff seeks in data request Nos. 11 and 12 and for which Duke Energy Kentucky now seeks confidential treatment (Confidential Information) shows contracts that include sensitive information regarding vendors currently service Duke Energy Kentucky's regulated utility affiliates in the Carolinas, Ohio and Indiana.[1] The information contained in Staff-DR-01-025b is specific kW and kWh impacts that were developed by third parties, Morgan Marketing Partners, Franklin Energy and TecMarket Works. Duke Energy Kentucky has an agreement with these third parties not to release this information to the general public.

In support of this Petition, Duke Energy Kentucky states:

1. The Kentucky Open Records Act exempts from disclosure certain commercial

[1] Data Request Nos. 11 and 12

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 public disclosure of the information described in Nos. 11 and 12 contains sensitive information, the disclosure of which would injure Duke Energy Kentucky and its competitive position and business interest. Duke Energy Corporation's Marketing is responsible for the procurement of energy efficiency education programs in the Duke Energy Corporate footprint and thus its policies and procedures are all-encompassing. The public disclosure of the information described above would place Duke Energy Kentucky at a commercial disadvantage as it negotiates contracts with various suppliers and vendors and potentially harm Duke Energy Kentucky's competitive position in the marketplace, to the detriment of Duke Energy Kentucky and its customers. Moreover, this information involves the prices for services provided by vendors who compete for these contracts.

The public disclosure of this information would put these vendors at a competitive disadvantage in that it would allow their direct competitors to have access to pricing and terms and conditions that were negotiated with Duke Energy Corp. Because these blanket contracts involve services being provided in several jurisdictions, the release of this information could potentially harm Duke Energy Kentucky's sister utilities and respective customers as well. Competitors could use this information to manipulate their own prices and put Duke Energy Kentucky or its affiliates at a commercial disadvantage in negotiations for similar services going forward.

3. Duke Energy Kentucky requests confidential protections for certain third-party data contained in response to data request number 25. In responding to these requests, Duke Energy Kentucky used certain confidential and proprietary data modeling consisting of confidential information belonging to third parties who take reasonable steps to protect their confidential information, such as only releasing such information subject to confidentiality agreements. Duke Energy Kentucky used specific kW and kWh impacts developed by independent third parties, Morgan Marketing Partners, Franklin Energy and TecMarket Works, subject to confidentiality restrictions. Duke Energy Kentucky is contractually bound to maintain such information confidential.

4. The information for which Duke Energy Kentucky is seeking confidential treatment is not known outside of Duke Energy Corporation.

5. Duke Energy Kentucky does not object to limited disclosure of the confidential information described herein, pursuant to an acceptable protective agreement, with the Attorney General or other intervenors with a legitimate interest in reviewing the same for the purpose of participating in this case.

6. 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, Ky., 904 S.W.2d 766, 768.

7. In accordance with the provisions of 807 KAR 5:001 Section 7, the Company is filing with the Commission one copy of the Confidential Material highlighted and ten (10) copies without the confidential information.

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 O. D'Ascenzo (92796)
Associate General Counsel
Amy B. Spiller (85309)
Deputy General Counsel
Duke Energy Business Services, LLC
139 East Fourth Street, 1303 Main
Cincinnati, Ohio 45201-0960
Phone: (513) 287-4320
Fax: (513) 287-4385
e-mail: rocco.d'ascenzo@duke-energy.com

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing filing was served on the following via overnight mail, postage prepaid, this 27th day of April 2012:

Jennifer B. Hans Assistant Attorney General's Office 1024 Capital Center Drive, Ste 200 Frankfort, Kentucky 40601-8204	Richard Raff Public Service Commission 730 Schenkel Lane Frankfort, Kentucky 40602
Florence W. Tandy Northern Kentucky Community Action Commission P.O. Box 193 Covington, Kentucky 41012	Carl Melcher Northern Kentucky Legal Aid, Inc. 302 Greenup Covington, Kentucky 41011

Rocco O. D'Ascenzo

VERIFICATION

State of Ohio)
)
County of Hamilton)

The undersigned, Ashlie Ossege, being duly sworn, deposes and says that I am employed by the Duke Energy Corporation affiliated companies as Manager, Market Analytics; that on behalf of Duke Energy Kentucky, Inc., I have supervised the preparation of the responses to the foregoing information requests; and that the matters set forth in the foregoing responses to information requests are true and accurate to the best of my knowledge, information and belief after reasonable inquiry.

Ashlie Ossege

Ashlie Ossege, Affiant

Subscribed and sworn to before me by Ashlie Ossege on this 19th day of April 2012.

ADELE M. DOCKERY
Notary Public, State of Ohio
My Commission Expires 01-05-2014

Adele M Dockery

NOTARY PUBLIC

My Commission Expires: 1/5/2014

VERIFICATION

State of Ohio)
)
County of Hamilton)

SS:

The undersigned, Bruce Sailers, being duly sworn, deposes and says that he is the Manager, Product Development Analytics, that he has supervised the preparation of the responses to the foregoing information requests; and that the matters set forth in the foregoing responses to information requests are true and accurate to the best of his knowledge, information and belief, after reasonable inquiry.

Bruce L. Sailers
Bruce Sailers, Affiant

Subscribed and sworn to before me by BRUCE SAILERS on this 19TH day of April 2012.

ADELE M. DOCKERY
Notary Public, State of Ohio
My Commission Expires 01-05-2014

Adele M. Dockery
NOTARY PUBLIC

My Commission Expires: 1/5/2014

VERIFICATION

State of Ohio)
) **SS:**
County of Hamilton)

The undersigned, Kevin Bright, being duly sworn, deposes and says that he is the Managing Director, Large & Small Business Market Strategy & Products, and that the matters set forth in the foregoing testimony are true and accurate to the best of his knowledge, information and belief, after reasonable inquiry.

Kevin Bright, Affiant

Subscribed and sworn to before me by KEVIN BRIGHT on this 19TH day of April 2012.

ADELE M. DOCKERY
Notary Public, State of Ohio
My Commission Expires 01-05-2014

NOTARY PUBLIC

My Commission Expires: 1/5/2014

VERIFICATION

State of North Carolina)
)
County of Mecklenburg)

SS:

The undersigned, Timothy Duff, being duly sworn, deposes and says that he is the General Manager, Retail Customer & Regulated Strategy, that he has supervised the preparation of the responses to the foregoing information requests; and that the matters set forth in the foregoing responses to information requests are true and accurate to the best of his knowledge, information and belief, after reasonable inquiry.

Timothy Duff, Affiant

Subscribed and sworn to before me by TIMOTHY DUFF on this 17 day of April 2012.

CHRISTOPHER Lee HAMRICK

NOTARY PUBLIC

My Commission Expires:

My Commission Expires October 24, 2014

VERIFICATION

State of North Carolina)
) **SS:**
County of Mecklenburg)

The undersigned, Casey Mather, being duly sworn, deposes and says that he is the Managing Director, Mass Market Strategy & Market Plans, and that the matters set forth in the foregoing testimony are true and accurate to the best of his knowledge, information and belief.

Casey Mather
Casey Mather, Affiant

Subscribed and sworn to before me by Casey Mather on this 18th day of April 2012.

Patricia W. Townsend
NOTARY PUBLIC

My Commission Expires: June 24, 2014

VERIFICATION

State of Ohio)
)
County of Hamilton)

SS:

The undersigned, Jim Ziolkowski, being duly sworn, deposes and says that he is the Rates Manager, and that the matters set forth in the foregoing testimony are true and accurate to the best of his knowledge, information and belief.

Jim Ziolkowski, Affiant

Subscribed and sworn to before me by Jim Ziolkowski on this 24TH day of April 2012.

NOTARY PUBLIC

ADELE M. DOCKERY
Notary Public, State of Ohio
My Commission Expires 01-05-2014

My Commission Expires: 1/5/2014

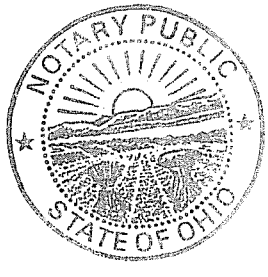
VERIFICATION

STATE OF OHIO)
) SS:
COUNTY OF HAMILTON)

The undersigned, Thomas J. Wiles, being duly sworn, deposes and says that he is employed by the Duke Energy Corporation affiliated companies as General Manager, Market Analytics for Duke Energy Business Services, LLC; that on behalf of Duke Energy Kentucky, Inc., he has supervised the preparation of the responses to the foregoing information requests; and that the matters set forth in the foregoing responses to information requests are true and accurate to the best of his knowledge, information and belief after reasonable inquiry.

Thomas J. Wiles

Subscribed and sworn to before me by Thomas J. Wiles on this 24TH day of April 2012.



E. MINNA ROLFES
Notary Public, State of Ohio
My Commission Expires
June 10, 2012

NOTARY PUBLIC

My Commission Expires: 6/10/12

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Duke Energy Kentucky
Case No. 2012-085
Staff First Set Data Requests
Date Received: April 13, 2012

STAFF-DR-01-001

REQUEST:

Refer to pages 2-3 of Duke Kentucky's March 6, 2012 Demand-Side Management ("DSM") Application ("Application"). There are 12 programs listed as current DSM programs. Also refer to pages 5-6 of the Application, where 10 programs are listed that are to continue as part of Duke Kentucky's DSM portfolio.

a. Provide an explanation of how and which of the 12 current DSM programs are folded into the 10 programs.

b. Explain whether the Program Administration, Development & Evaluation Funds and the Energy Efficiency Website are to continue, and if so, in which of the 10 programs they will be included.

RESPONSE:

a.

- Low Income Services includes Residential Conservation and Energy Education and Payment Plus;
- Residential Energy Assessments included Home Energy House Call. This program would have included Personalized Energy Report (PER)®, however PER® is no longer being offered in the revised portfolio;
- Energy Education Program for Schools Program includes Residential Comprehensive Energy Education Program (NEED) and the new theatrical portion of the program;
- Smart $aver® Energy Efficient Residences Program is currently Residential Smart $aver and Smart $aver® Residential Energy Efficient Products Program is currently Energy Star Products[1];
- Smart $aver® Prescriptive Program, Smart $aver Custom Program, and Smart $aver® Energy Assessments Program are currently referred to as C&I High Efficiency Incentive (for Businesses and Schools);
- Residential Direct Load Control – Power Manager Program is the current Power Manager Program;

[1] The Smart $aver Residential Energy Efficient Products Program and the Energy Efficient Residences Program are individual measures that are part of a single and larger program referred to and marketed as Residential Smart $aver. For ease of administration and communication with customers the two measures have been divided into separate tariffs even though they are a single program.

- Peak Load Management (Rider PLM) aka PowerShare® is the current Peak Load Management (Rider PLM) aka PowerShare®.

b. Program Administration, Development & Evaluation Funds will continue but is not a separate program. In the past, this program was established to cover the evaluation, measurement, and verification for the portfolio. These costs are still calculated in the rider, however, will not be stated as a separate program within the portfolio.

   For the Energy Efficiency Website, customers will still have the capability to participate in the program and print a copy of their report. Duke Energy Kentucky will discontinue distributing the free six CFLs to avoid confusing this offer with the Residential Smart $aver® program.

   The Personalized Energy Report (PER)® will no longer be available to customers. Customers can still receive a report by participating in the Energy Efficiency Website.

PERSON RESPONSIBLE: Casey Mather

Duke Energy Kentucky
Case No. 2012-085
Staff First Set Data Requests
Date Received: April 13, 2012

STAFF-DR-01-002

REQUEST:

Refer to page 7 of the Application, Item 16. It states, "this new portfolio is consistent with the Company's most recent IRP filed in Case No. 2011-00235 and is estimated to increase impacts for the period 2012-2016 beyond those described in the High EE Case in the 2011 IRP by approximately 23 percent or 23,000 MWh, assuming full projected participation in all of the measures offered in the proposed portfolio."

a. Provide, by year, the projected 23,000 MWh impacts for 2012-2016.

b. Provide the projected energy savings, by program and by year, for the period 2012-2016.

c. Provide the projected peak demand load savings, by year, for the period 2012-2016.

RESPONSE:

a. Upon further analysis of the net impacts used for comparison to the IRP, Duke Energy Kentucky has determined that the new portfolio is estimated to increase impacts for the period 2012-2016 beyond those described in the 2011 IRP by approximately 20,000 MWh rather than 23,000 MWh as originally estimated. This change in estimated impacts affects only the net values, the gross values reported in the Application are not impacted. The following table provides, by year, the projected 20,000 MWh impacts for 2012-2016:

	Net Cumulative KWh w/losses				
Program Name	**2012**	**2013**	**2014**	**2015**	**2016**
Energy Efficiency Education Program for Schools	183,403	366,805	550,208	733,611	917,014
Low Income Services	276,994	553,989	826,734	1,099,478	1,372,223
Residential Energy Assessments	207,195	414,390	621,585	828,780	1,035,975
Residential Smart $aver®	26,017,935	31,509,689	36,109,533	39,777,167	43,819,234
Power Manager	-	-	-	-	-
Smart $aver® Prescriptive	6,138,639	14,126,012	22,621,387	31,235,926	40,711,790
Smart $aver® Custom	261,986	3,875,205	7,669,085	11,652,658	15,835,411
Power Share®	-	-	-	-	-
Appliance Recycling Program	-	1,050,737	2,347,820	3,748,802	5,149,785
Low Income Neighborhood	556,406	1,112,812	1,513,425	1,914,037	2,314,650
My Home Energy Report	8,388,964	8,450,971	8,519,786	8,588,968	8,674,895

Total Net Cumulative KWh w/losses	**42,031,523**	**61,460,611**	**80,779,562**	**99,579,429**	**119,830,975**
New Portfolio Net Cumulative MWh w/losses	**42,032**	**61,461**	**80,780**	**99,579**	**119,831**
2011 IRP Net Cumulative MWh w/losses	**13,237**	**29,936**	**48,299**	**68,770**	**99,311**
Difference between 2016 Net Cumulative MWh New Portfolio and IRP					**20,520**

Total Net Incremental KWh w/losses	**42,031,523**	**19,429,088**	**19,318,951**	**18,799,867**	**20,251,547**
New Portfolio Net Incremental MWh w/losses	**42,032**	**19,429**	**19,319**	**18,800**	**20,252**
2011 IRP Net Incremental MWh w/losses	**13,237**	**16,699**	**18,363**	**20,471**	**30,541**

Difference between Net Incremental MWh New Portfolio and IRP	**28,795**	**2,730**	**956**	**(1,671)**	**(10,289)**
Sum of annual difference between Net Incremental MWh New Portfolio and IRP					**20,520**

b. The projected energy saving, by program by year, for the period 2012-2016 were provided in the Application as included in Exhibits AJO-5 and AJO-6 and are presented again in consolidated form below:

	Gross Cumulative KWh w/losses				
Program Name	**2012**	**2013**	**2014**	**2015**	**2016**
Energy Efficiency Education Program for Schools	183,403	366,805	550,208	733,611	917,014
Low Income Services	276,994	553,989	830,983	1,107,978	1,384,972
Residential Energy Assessments	207,195	414,390	621,585	828,780	1,035,975
Residential Smart $aver®	31,415,083	38,677,612	44,911,315	50,068,812	55,691,813
Power Manager	-	-	-	-	-
Smart $aver® Prescriptive	9,854,255	22,079,654	35,009,347	48,386,837	63,101,862
Smart $aver® Custom	261,986	3,875,205	7,669,085	11,652,658	15,835,411
Power Share®	-	-	-	-	-
Appliance Recycling Program	-	1,751,228	3,913,033	6,248,004	8,582,975
Low Income Neighborhood	556,406	1,112,812	1,669,219	2,225,625	2,782,031
My Home Energy Report	8,388,964	8,450,971	8,519,786	8,588,968	8,674,895

c. The projected peak demand load savings, by program and by year, for the period 2012-2016 were provided in the Application as included in Exhibits AJO-5 and AJO-6 and are presented again in consolidated form below:

	Gross Cumulative Summer Coincident KW w/losses				
Program Name	**2012**	**2013**	**2014**	**2015**	**2016**
Energy Efficiency Education Program for Schools	15	29	44	58	73
Low Income Services	47	94	141	188	235
Residential Energy Assessments	139	279	418	557	697
Residential Smart $aver®	4,200	5,790	7,331	8,821	10,441
Power Manager	12,395	12,312	12,634	13,067	13,517
Smart $aver® Prescriptive	1,997	4,618	7,395	10,241	13,371
Smart $aver® Custom	30	442	875	1,330	1,808
Power Share®	26,285	23,099	25,202	27,305	27,305
Appliance Recycling Program	-	456	1,018	1,626	2,233
Low Income Neighborhood	145	290	434	579	724
My Home Energy Report	2,183	2,199	2,217	2,235	2,257

PERSON RESPONSIBLE: Thomas J. Wiles

Duke Energy Kentucky
Case No. 2012-085
Staff First Set Data Requests
Date Received: April 13, 2012

STAFF-DR-01-003

REQUEST:

Refer to page 8 of the Application, Item 18. It states, "[i]n accordance with KRS 278.285(1)(f), this filing, including the proposed programs was developed with the input of the Company's Collaborative. And the Company is proceeding with this Application with the consensus support of this Collaborative."

a. Provide a list of the Residential and Commercial Collaborative members and representatives that were part of the consensus.

b. Provide a list of all the Collaborative members and their appointed representative(s).

RESPONSE:

a.

Meeting Attendance:

- Jennifer Beisle - Northern Kentucky Community Action Agency
- Lee Colten - Kentucky Department for Energy Development and Independence
- Carol Cornell - Northern Kentucky University - Small Business Development
- Jock Pitts - People Working Cooperatively
- Karen Reagor - Kentucky National Energy Education Development (NEED)
- Pat Dressman - Campbell County Fiscal Court
- Heather Kash - Attorney General's Office
- Robert Duff - Kentucky Department for Energy Development and Independence
- Carl Melcher - Northern Kentucky Legal Aid

b. See attachment Staff-01-003b.pdf

PERSON RESPONSIBLE: Tim Duff

First Name	Last Name	Organization/Company
Chris	Baker	Kenton County School
Jennifer	Belisle	N.Ky Community Action Commission
John	Cain	Wiseway Supply
Carol	Cornell	Northern Ky University - Small Business Development
John	Davies	Kentucky Department for Energy Development and Independence
Pat	Dressman	Campbell County Fiscal Court
Talia	Frye	Brighton Center
Russell	Guy	Campbell County Fiscal Court
Heather	Kash	Kentucky Attorney General's Office
Jennifer	Hans	Kentucky Attorney General's Office
Daniele	Longo	Northern Kentucky Chamber of Commerce
Carl	Melcher	Northern Kentucky Legal Aid
Ed	Monohan, Sr.	Monohan Development Company
Jock	Pitts	People Working Cooperatively
Nina	Creech	People Working Cooperatively
Laura	Pleiman	Boone County Fiscal Court
Pam	Proctor	Kentucky Energy Smart Schools
Karen	Reagor	Kentucky NEED Project
Gary	Sinclair	Kenton County Fiscal Court
Florence	Tandy	N.Ky Community Action Commission
Lee	Colten	Kentucky Department for Energy Development and Independence
Greg	Guess	Kentucky Department for Energy Development and Independence
Chris	Jones	Greater Cincinnati Energy Alliance
Andy	Holzhauser	Greater Cincinnati Energy Alliance
Trisha	Haemmerle	Duke Energy
Tim	Duff	Duke Energy

Duke Energy Kentucky
Case No. 2012-085
Staff First Set Data Requests
Date Received: April 13, 2012

STAFF-DR-01-004

REQUEST:

Refer to page 9 of the Application, Item 22. It states: [i]n order to encourage future development of DSM programs and innovation, the Company is also requesting the Commission to approve a limited automatic approval process for pilot programs with the following parameters:

- The total pilot program cost including EM&V is projected to be less than $75,000.
- The pilot program is found to be cost effective under the Total Resource Cost test (TRC) and Utility Cost Test (UCT).
- The pilot program has been vetted and approved by the Collaborative.

a. Explain when Duke Kentucky would notify the Commission of a new pilot program, noting that a pilot program would be part of the annual DSM update filed on November 15 of each year.

b. Explain whether the total cost of a pilot program includes lost revenues and shared savings.

c. Explain whether Duke Kentucky would have a threshold of pilot program expenditures as a percent of total portfolio program expenditures.

d. Provide an explanation of the word "limited" in limited automatic approval process for pilot programs.

e. Explain how cost recovery would occur if the Commission were to approve the $75,000 automatic approval process for pilot DSM programs.

RESPONSE:

a. Duke Energy Kentucky would file a notification with the Commission of the pilot at least ten business days prior to the pilots proposed start date. This notification would give a brief description of the pilot, the rationale for the pilot, including the market conditions and the projected cost and energy savings.

b. The $75,000 threshold for the automatic pilot approval process only pertains to the program costs and associated EM&V for the pilot. While Duke Energy Kentucky would seek to collect both a shared savings incentive and lost revnues from the pilot, it is not intending to include the projected shared savings incentive or lost revenues in the calculation of what would apply to the $75,000 threshhold.

c. Duke Energy Kentucky has not proposed a threshold of pilot program expenditures as a percent of total portfolio program expenditures with regard to its proposal for automatic pilot approvals. The Company does not foresee bringing a high number of pilots to market under the automatic approval process, but if a threshold would give the Commission more comfort with the proposal, the Company would be willing to propose that the pilot program expenditures under the automatic pilot approval process not exceed 5% of the of total annual portfolio program expenditures.

d. Duke Energy Kentucky used the term "limited" to describe the proposed automatic pilot approval process because it attempted to limit the scale of the pilot, as defined by the amount of program expenditures, which would be eligible for automatic approval. This limit was proposed in order to address possible stakeholder apprehension regarding the magnitude of dollars being spent without prior Commission approval.

e. The Company would propose to recover the up to $75,000 associated with a pilot program that was brought to market under the automatic approval process, at the time that it would include pilot costs and impacts in the Company's November 15th annual energy efficiency filing.

PERSON RESPONSIBLE: Tim Duff

Duke Energy Kentucky
Case No. 2012-085
Staff First Set Data Requests
Date Received: April 13, 2012

STAFF-DR-01-005

REQUEST:

Refer to page 9 of the Application, Item 23.

a. Explain whether Duke Kentucky would be ready to begin implementation of its proposed DSM portfolio if the Commission issued an Order approving the Application by July 1, 2012.

b. Explain whether implementing the proposed DSM portfolio will require additional staffing, and if so, how the costs of this staffing will be recovered.

RESPONSE:

a. Duke Energy Kentucky is prepared to begin implementation of its proposed DSM portfolio if the Commission issued an Order approving the Application by July 1, 2012. The new DSM programs that Duke Energy Kentucky is proposing to add to the existing portfolio are already or will soon be offered in the neighboring Duke Energy Ohio service territory. Duke Energy Kentucky believes that minimal start up time is needed to get the new portfolio of DSM offerings to its Duke Energy Kentucky customers and plans to have all the products in the market within six months of approval.

b. While the vendors used to deliver the program may need to increase staffing to meet the customer demand in Kentucky, these costs are already included in projected program costs and will be directly billed to Duke Energy. Duke Energy Kentucky does not believe that the implementation of its proposed DSM portfolio will require any additional staffing.

PERSON RESPONSIBLE: Tim Duff

Duke Energy Kentucky
Case No. 2012-085
Staff First Set Data Requests
Date Received: April 13, 2012

STAFF-DR-01-006

REQUEST:

Refer to page 4, lines 16-20, of the Direct Testimony of Timothy J. Duff ("Duff Testimony"). It states, "Duke Energy Kentucky's service territory is adjacent to the service territory of its parent company, Duke Energy Ohio, Inc. (Duke Energy Ohio). As a result, the two companies share a common media market and Duke Energy Kentucky customers are often exposed to advertisements that are specific to Duke Energy Ohio."

a. Explain whether the advertisements are run under the name of Duke Energy or Duke Energy Ohio ("Duke Ohio").

b. Once Duke Kentucky receives an Order from the Commission, explain how the cost of advertisement will be allocated between Duke Ohio and Duke Kentucky .

c. Identify the account in which the cost of advertisement will be charged on Duke Kentucky's books.

d. Identify and explain what impacts, if any, the proposal would have on other DSM expenses that are allocated between Duke Kentucky and Duke Ohio, or other Duke Energy affiliates.

RESPONSE:

a. The advertisements have been run under the generic Duke Energy brand without any mention to the specific Duke Energy Ohio utility name.

b. Once Duke Kentucky receives an Order from the Commission approving its DSM portfolio, the Company proposes that the cost of advertisements for all DSM programs that are offered in both states will be allocated between Duke Energy Ohio and Duke Energy Kentucky based upon the total number of customers in each state.

c. Duke Energy Kentucky intends to book the costs associated with any advertising of its DSM portfolio in FERC Account 0557000 – Other Expense – Oper.

d. Duke Energy Kentucky believes that the accounting and proposed allocation of any advertisement costs associated with the Company's DSM portfolio will not have any impact on other DSM expenses that are allocated between Duke Kentucky and Duke Ohio, or other Duke Energy affiliates.

PERSON RESPONSIBLE: Tim Duff

Duke Energy Kentucky
Case No. 2012-085
Staff First Set Data Requests
Date Received: April 13, 2012

STAFF-DR-01-007

REQUEST:

Refer to page 6, lines 12-14, of the Duff Testimony. It states, "[t]he indirect savings are the bill savings that customers will realize over time from the avoided system costs associated with the overall reduction in energy consumption and demand." Explain the phase "indirect savings are the bill savings that customers will realize."

RESPONSE:

The indirect savings that are referenced on page 6, lines 12-14 of Duff Testimony are the bill savings that all customers will realize over time from the aggregate impact of all customer participation in the energy efficiency and demand response programs offered by the Company. For example, because energy efficiency programs cause participating customers to use less energy, which leads the Company to generate less energy and thereby consume less fuel (coal or natural gas); all customers will share a portion of the fuel savings reflected in the Company's fuel rider.

PERSON RESPONSIBLE: Tim Duff

Duke Energy Kentucky
Case No. 2012-085
Staff First Set Data Requests
Date Received: April 13, 2012

STAFF-DR-01-008

REQUEST:

Refer to page 7, lines 20-22, of the Direct Testimony of Ashlie J. Ossege ("Ossege Testimony"). It states, "[o]ur research is beginning to show that the very order in which we offer programs to customers affects the uptake and participation rate."

a. Explain the process of determining the order in which programs are offered to customers.

b. Explain how the order affects the uptake and participation rate.

RESPONSE:

a. Currently, Duke Energy Kentucky is not currently managing the order in which programs are offered to customers. If Duke Energy Kentucky begins to manage the order in which programs are offered to customers, the most accurate way to measure marketing effectiveness is to perform a full experimental design. We would examine past program marketing campaigns to assess if marketing of EE programs and particularly the order in which programs were marketed impacted participation. Duke Energy has a robust campaign data warehouse from which data can be obtained for this analysis. We would then review each campaign at each time period individually, and a statistical test of difference of means would be performed.

b. Energy Efficiency marketing and the order of program specific marketing can affect the uptake and participation rates. This approach is based on the theory of the "priming effect." *Priming is the implicit memory effect in which exposure to a stimulus influences* response to a subsequent stimulus. Applied to the concept of utility marketing, exposing a customer to an energy efficient idea, concept or education (i.e. marketing or engagement campaign) influences their response to subsequent stimulus (i.e. Power Manager). This effect is evident in the quantitative data collected by Duke Energy Kentucky, in which the response rate for demand response programs was higher for those customers that previously participated in Home Energy House Call, than for those that have not, and for those customers that were solicited for CFLs but did not necessarily accept the CFL offer. Based on analysis of that data, we have seen that engagement and interaction drives follow on participation. However, customers who participated in these programs in the reverse order, Power Manager followed by Personalized Energy Report (self-directed audit) did not drive a higher response rate. We believe this may be due to

higher level of customer engagement associated with Power Manager. Details about this research can be found in Staff-DR-01-008 Attachment.

PERSON RESPONSIBLE: Ashlie J. Ossege

Marketing Effectiveness – EE "Gateway"

May Wu, Integral Analytics, Inc
Ashlie Ossege, Duke Energy
Patricia Thompson, Sageview, Inc

ABSTRACT

Evaluating marketing effectiveness, to date, has generally focused on customer response rates for a single program. Our recent findings reveal that evaluating marketing effectiveness across two or more programs, or in light of a sequence of promotional activities, is more effective in many cases. Preliminary analysis indicates that the value proposition of improved marketing effectiveness even steeply discounted for "provability" is fewer than 3 cents per kWh, making marketing effectiveness a readily cost effective acquisition strategy for efficiency. As utilities begin to promote behavioral /feedback programs (e.g., energy reports, real time displays), and technologies emerge which naturally gather and provide feedback and tips to customers, it is natural to begin to wonder what the potential leverage effect might be for these behavioral programs, in combination or in sequence. In our findings, energy reports tend to encourage participation in some energy efficiency (EE) programs more so than others. Knowing more precisely which sequences, or combinations, are more effective provides energy managers insight to effectively implement their programs. We can begin to explore new notions of sequential promotion (e.g., identify the number of direct mail follow-up pieces that maximize participation), and which EE programs cross-sell effectively. This paper explores the interrelationship between various EE programs across three states in Duke Energy's service territory, and examines the "gateway" effect of participation within one program that leads to participation in another. More importantly we view this effect across programs and time, providing study results of the best "gateway" programs, optimal lag time between program solicitations, diminishing returns of repetitive solicitations and the effectiveness of sequential promotion.

Introduction

Evaluating marketing effectiveness has generally focused on customer response rates for a single program. Our recent findings reveal that evaluating marketing effectiveness across two or more programs, or in light of a sequence of promotional activities, is more effective in many cases.

The term EE "gateway" is used to describe the phenomenon that if a customer participates in one EE program, it is likely for them to participate in another EE programs that follows. Specifically, we reviewed marketing effectiveness from a cross-sell perspective, by measuring how interest in program A leads to interest in program B. This is not evaluating marketing effectiveness in a traditional marketing setting.

The most accurate way to measure such effectiveness is through experimental design. A treatment group and a control group should be selected before the sequence of campaigns begins and other exogenous variables are introduced. In reality, marketing campaigns are constrained by timing and budget, and most consideration is given to achieve high response rates or kWh achievement for individual programs independently. Even if we don't have control of the order or timing of campaigns and no experimental design is set up in advance, treatment and control groups can still be constructed

with good campaign data. However, it does require careful consideration when developing comparisons over time, and unconditional or overall participation or take rates to conditional take rates.

In this paper we examine two cases based on campaign data from Duke Energy. First, we examine whether CFL initiatives have higher "gateway" effect than other EE programs. We specifically looked at the case in Ohio. Next, we examine whether audit related programs have higher "gateway" effects than other EE programs.

Are CFLs a Free "Gateway" to DR programs? – An Example in Ohio

CFLs have been considered a free "gateway" drug to EE programs promoting awareness and interest in energy conservation. As the low hanging fruit of EE, many utilities began CFL campaigns early before the market transformed. On the other hand, most CFL marketing involved a coupon or give-away and minimum effort from a customer perspective[1] when compared to marketing demand response (DR) programs, or home audit or behavioral type programs. By nature, CFL marketing differs from other EE programs, as it appears to have attracted either "true EE adopters" or those open to EE messaging in early phases and consumers searching for freebies later on. Industry observation and research also reveals that CFL coupon redeemers are somewhat different from DR participants.

Few studies examine the correlation between marketing of CFLs and later adoption of other programs or technologies. Furthermore, quantifying the impact of CFL marketing not only sheds light on marketing effectiveness and market transformation over time but also on future marketing strategies. In this section we specifically look at these questions:

- How much of the impact resulted from CFL offers as a tool to broadcast EE messages compared to the impact resulting from early CFL adopters?
- How effective are CFL marketing campaigns in cross-selling DR programs?
- How many times is a customer exposed to CFL offers before adoption occurs?

How much of the impact resulted from CFL offers as a tool to broadcast EE messages compared to the impact resulting from early CFL adopters?

Most "gateway" effects come from CFL solicitations as an instrument to broadcast EE messages. These marketing campaigns spread the concept of saving energy and money to promote awareness of energy efficiency and conservation. CFL solicitations have different effects from CFL participation, since people who actively redeem CFL coupons can be a mix of true advocates and purely rebate or coupon driven. Based on multiple years of CFL redemption data, this does not always lead to DR participation. For example, only 2-3% of CFL redeemers accept follow-up DR offers, as compared to a 9% overall DR acceptance rate in OH, achieved over time.

How Effective Are CFL Marketing Campaigns in Cross-selling DR Programs?

If we expand the definition of "CFL marketing" to include customers who received CFL offers and not just those who took CFLs, we find about 9.3% participate in a DR compared to the market average of 9.5%. Note that this is an average number over multiple years and while the market may have transformed, multiple forces including averaging over a long time period minimizes our ability to see effects from early ramp-up, diminishing returns, and stronger or less successful campaigns. As this

[1] Notable exceptions do exist however, particularly www.onechange.org which by virtue of the high level of engagement, generate significant levels of follow up offer participation from CFL campaigns.

is desirable, in order to control for unique characteristics of each campaign, and disaggregate the marginal or incremental effect of each CFL campaign from the overall effect, multiple constraints should be considered:

- CFL exposure should occur before DR solicitation.
- The time difference between CFL exposure and DR offer should be relatively fixed. We attribute the effectiveness to the most recent CFL campaign(s), more specifically, campaigns that occurred within the year.

Of course, the most accurate way to measure effectiveness is to perform a full experimental design, however, this method provides an accurate approximation. We reviewed each campaign at each time period individually. The conditional DR participation rate of each campaign at each time data point is calculated as:

$$\frac{\#\ of\ accepted\ DR\ offers\ |_{exposed\ to\ CFL(i)\ within\ 1\ year}}{\#\ of\ customers\ exposed\ to\ CFL(i)\ within\ 1\ year}$$

Marginal "gateway" effects from each additional CFL campaign exhibit diminishing returns over time. Figure 1 shows a graph of conditional participation or take rate at each time period associated with a CFL campaign. Based on this graph, marginal "gateway" effects from CFLs are highest in early phases, and over time exhibit a downward trend. The first five campaigns "gateway" effect produced a 36%-52% DR take rate, which is 4 to 6 times more effective than overall DR offers. This said, early CFL campaigns gave EE adopters options to experiment with new EE technology and increase awareness and interest in EE programs.

The marginal "gateway" effect from the last 2 CFL campaigns drops to near zero as the variable of time has a significant impact. There are several possible reasons:

- Different Audience: Both campaigns offer a free give-away where customers call or mail a coupon to get free bulbs. Comparing earlier CFL campaigns with coupons or other intake methods, requires minimal involvement and attracts a much broader audience than EE adopters
- Saturated Market: The market may have been saturated by CFL promotions, meaning true EE adopters would have already participated.

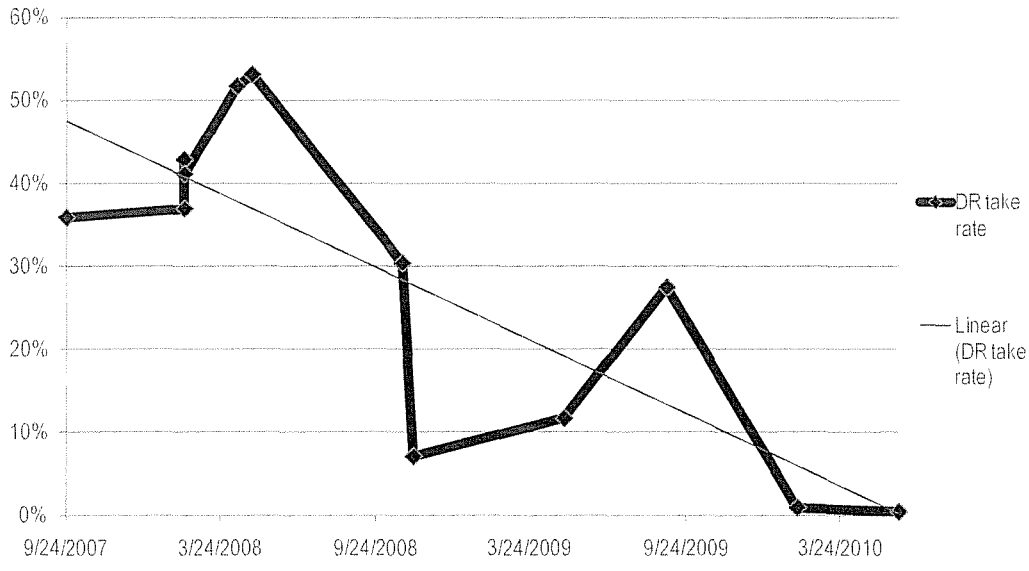

Figure 1. Percentage Take Rate of DR Offers after CFL Exposures

How many times is a customer exposed to CFL offers before adoption?

There are also diminishing returns with repeated CFL solicitations. Figure 2 shows the "gateway" effect along with the number of CFL marketing campaigns. The value of each data point is calculated based on # of accepted DR offers divided by the total # exposed to CFL solicitations. A polynomial equation is fitted to the data, which is a concave curve, meaning the effect increases with diminishing velocity until customers are exposed to six to seven CFL campaigns, then the effect decreases with accelerating velocity beyond the seventh campaign. CFL campaigns are effective at inception to spread the concept of saving energy and money to promote awareness of energy efficiency and conservation, with diminishing response over time. As demonstrated below, this research identifies that the maximum number of CFL campaigns producing the "gateway" effect should not exceed seven.

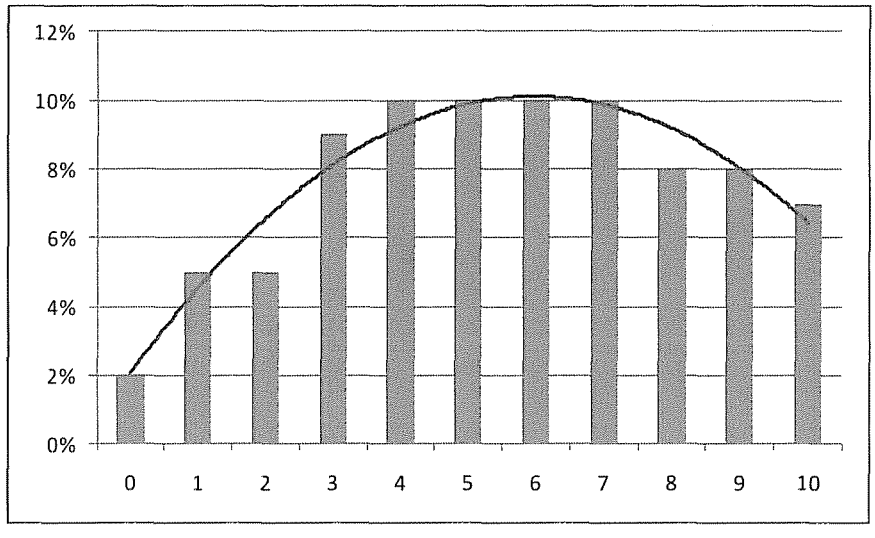

Figure 2. Distribution of DR Participants Compared to Number of CFL Exposures

How Effective Is An Onsite Audit Program in Driving DR and CFL Participation?

Home Energy House Call (HEHC) is a free in-home energy assessment offered by Duke Energy designed to help customers learn how their home uses energy and how they can save on their monthly bills. After customers sign up and schedule an appointment, an auditor will visit their house, collect information related to house structure and customer behavior, and install direct measures that goes with a free EE starter kit. Customers receive a customized recommendation report two days later. The unique face-to-face interaction with customers, providing real time responses and recommendations regarding energy efficiency has made HEHC an effective "gateway" program, while promoting interest in energy efficiency and conservation, and producing sequential participation in other programs.

How Effective Is An Onsite Audit Program in Cross-selling DR Programs? An Example in OH

HEHC significantly increases participation in DR programs based on data in OH. The fact that HEHC impact significantly increased DR acceptance suggests that offering DR *after* customers complete an audit may be a productive strategy. Customers who are interested in an audit are also more likely to be relatively more open to EE and may be more receptive to DR technology. Figure 3 shows the difference between the overall DR offer acceptance rate and the conditional acceptance rate if preceded by an audit program. HEHC as a precursor almost doubled the acceptance rate of DR offer.

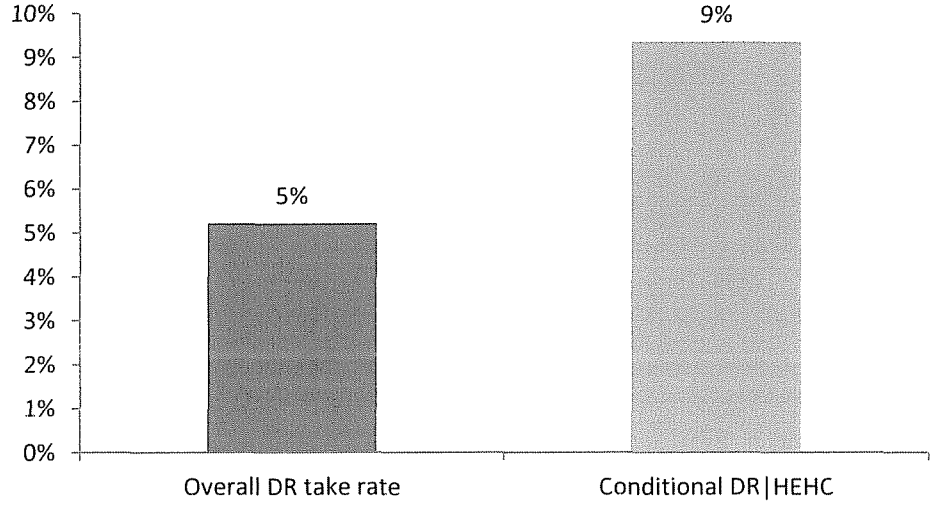

Figure 3. Overall DR Take Rate Compared to Participants Primed by Onsite Audit Program (HEHC) in OH

How Effective Is An Onsite Audit Program in Promoting CFLs?

Onsite audit programs also significantly increase the redemption of CFLs. 49% of HEHC participants accepted CFL offers, compared to a 43% overall CFL redemption rate in OH; 46% compared to 53% in NC and 50% compared to 57% in SC. This "gateway" effect is more significant in the early phase when the CFL market was immature, producing CFL redemption rates that doubled or tripled if primed by HEHC. Figure 4 shows the comparison between overall CFL redemption rates compared to conditional rates of HEHC participants. During the home visit, auditors installed low cost measures including CFLs, low flow shower heads, and faucet aerators. Auditors answered questions or concerns about the CFLs and the face-to-face communication was much more effective in promoting

customer interest and confidence. This effect is less significant after the market is mature. Figure 5 shows the comparison prior to 2009. Note the overall CFL redemption rate increases after the market is transformed and Duke Energy offered free CFLs as opposed to the discount coupon prior to 2009.

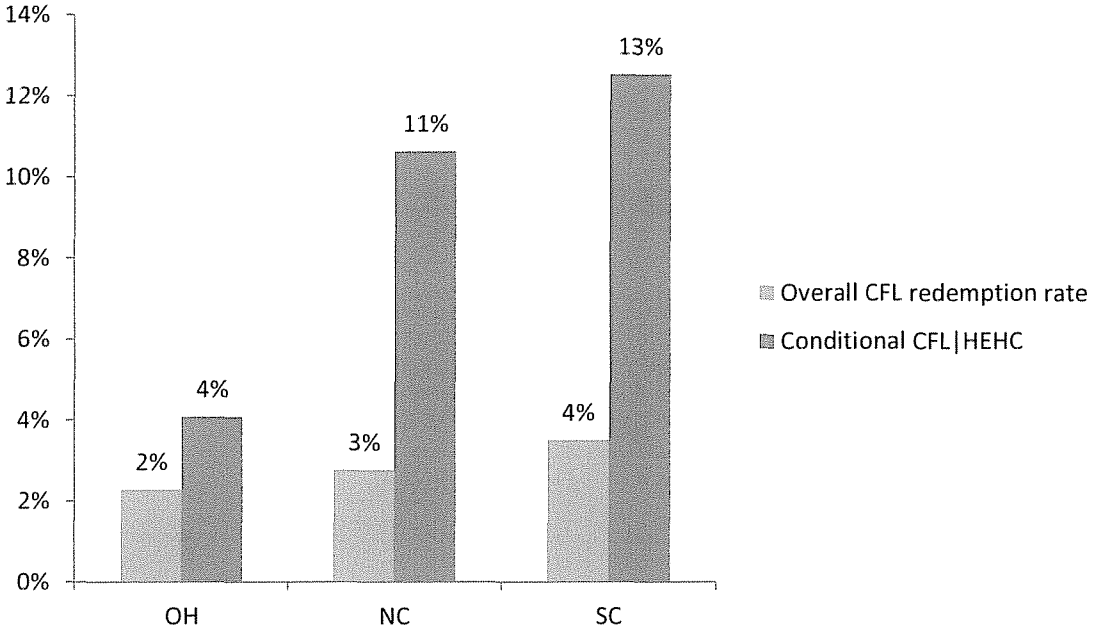

Figure 4. Overall CFL Redemption Rate Compared to Participants Primed by HEHC in OH, NC, SC Prior to 2009

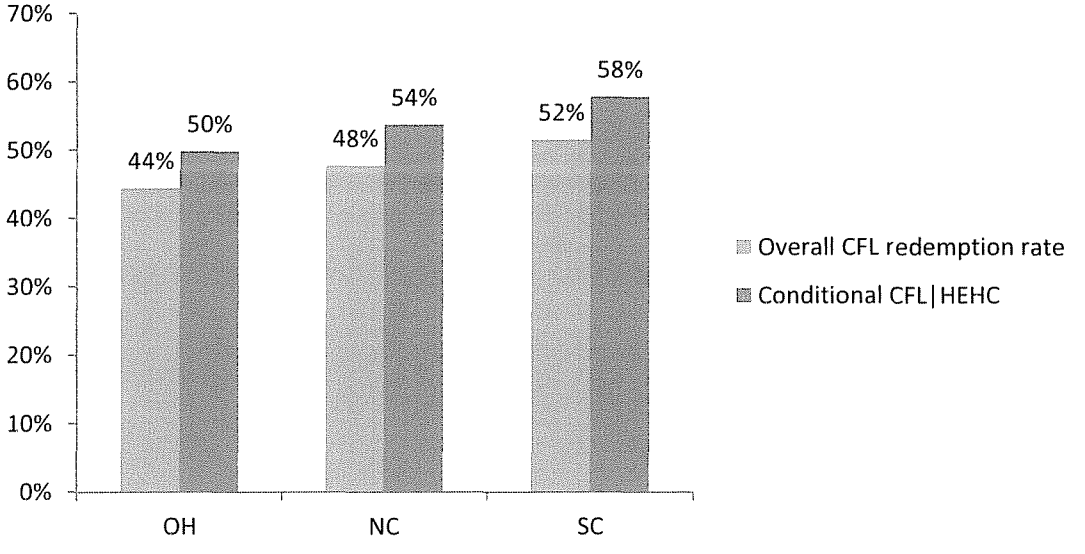

Figure 5. Overall CFL Redemption Compared to Participants Primed by HEHC in OH, NC, SC After 2009

How Effective Are Onsite Audit Programs in Promoting Other EE?

We reviewed the "gateway" effect from onsite audits to other EE participation rates. This analysis is based on HEHC process evaluation study in OH, NC and SC. Customer surveys were conducted and over 200 complete responses were collected. The surveyed customers were asked whether they took follow up action per the auditor's recommendation, and whether they installed or adopted any EE measures beyond the recommendation. Figure 6 shows the percentage of follow up action across 3 states: OH, NC, and SC. Overall, more than half of HEHC participants would be expected to follow the recommendation or go beyond and adopt EE technologies outside the recommendation. Over 60% surveyed in OH performed the recommendations found in their onsite audit, 53% in SC and 39% in SC respectively.[2]

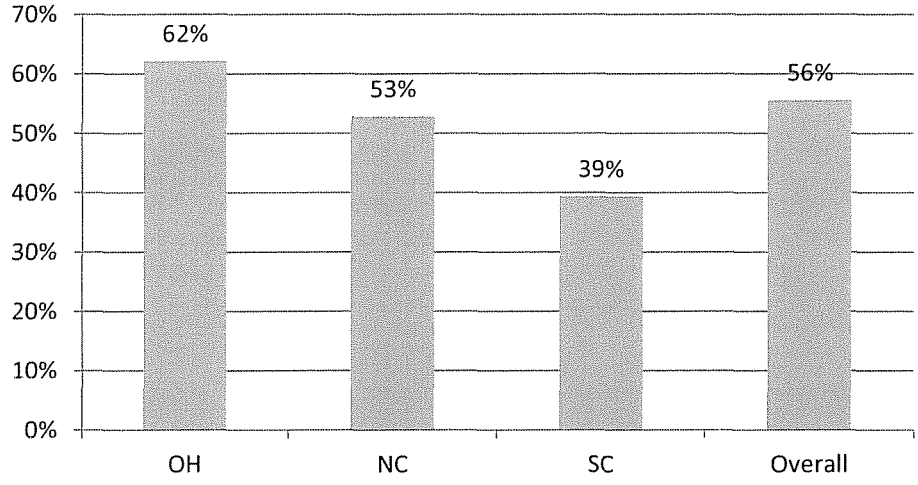

Figure 6. Percentage of Customers who Performed Recommendations

How Effective Are Offsite Audit Programs in Driving DR and CFL Participation?

Another quasi-audit program is the Personalized Energy Report (PER). By filling out and mailing a survey with 30 questions about home infrastructure and behavior, customers receive a customized energy report with analysis of their current usage and possible ways to be more energy efficient. Incentives include an energy starter kit with free CFLs. There is no appointment required and therefore, no onsite audit. PER employs a "pull" strategy as the customer has to be motivated to fill out a survey and trigger information exchange.

How Effective Are Offsite Audit Programs in Cross-selling DR Programs? An Example in OH

PER significantly increases acceptance of DR programs. This analysis is based on data in OH where PER significantly increased DR acceptance suggesting that offering DR after customers complete an energy survey is effective. Customers who took the time to fill out a survey and request more information about their energy use are more likely to be true EE adopters and more receptive to DR technology. Figure 7 shows the difference between overall DR offer acceptance rate and conditional acceptance rate if primed by PER. PER almost doubles the acceptance rate of DR offer. The effect is twice that prior to 2009, and 1.66 times after 2009. These rates are similar even after the market matures suggesting that engagement can continue to pay dividends after the program ends.

[2] See the evaluation work of Duke Energy's evaluation contractor, TecMarket Works.

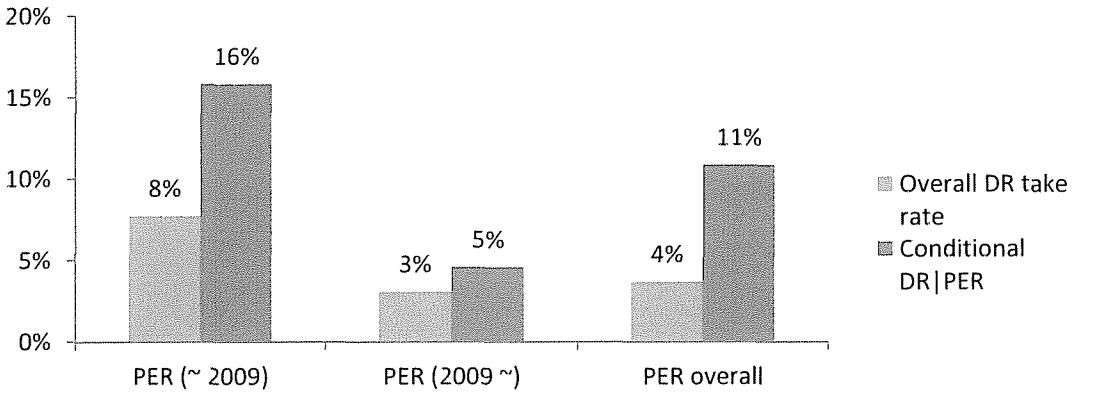

Figure 7. Overall DR Take Rate Compared to Participants Primed by Offsite Audit Program (PER) in OH

How Effective Is Offsite Audit Program in Promoting CFLs?

Compared to HEHC, PER has a less significant "gateway" effect in promoting CFLs. The effect of PER comes from 2 channels: CFL as an incentive and information about CFLs in the report. In order to encourage customers to fill out a survey, Duke Energy provided three free CFLs and other low cost measures in the early phase and six free CFLs and other low cost measures in the later phase. CFLs are recommended in the report, with information about benefits and FAQs addressing common concerns. Both channels lead to a doubling effect in the early phase similar to HEHC in OH, but this effect is diluted in the later phase, dropping off to near zero. As a result of data constraints, the comparison of NC and SC is based on data after 2009, which shows a small increase in OH, by 3% and 1% in NC and SC respectively.

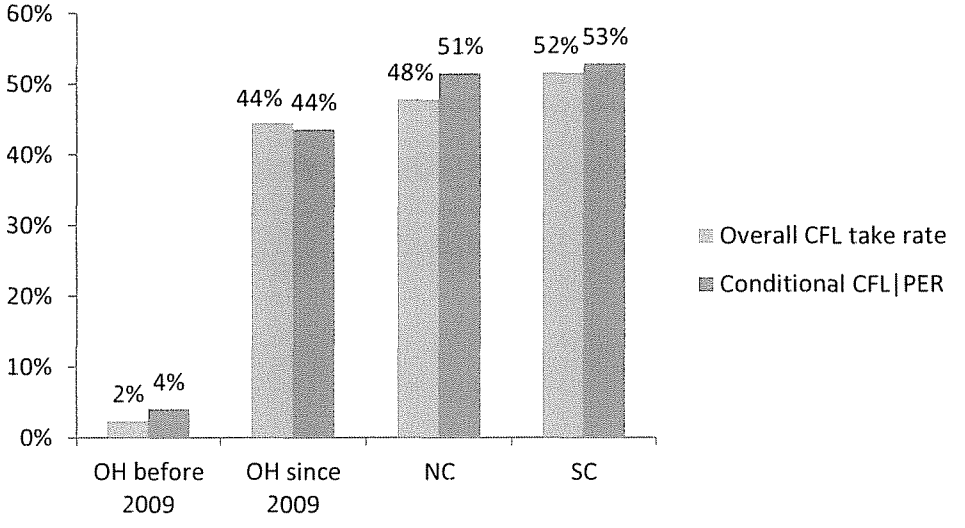

Figure 8. Average CFL Redemption Rate Compared to Participants Primed by PER in OH, NC, and SC

Conclusion

In general, when CFLs are delivered via coupon or free mail offers they appear to be more effective in driving "gateway" effects in early phases when saturation is low and markets have yet to be transformed. The "gateway" effect from CFLs was significant in this early phase. Over time, CFL adopters are mixed including EE advocates and as well as adopters whose focus may differ. As a result, "gateway" effects also diminish over time. Stand alone CFL campaigns do not appear to single-handedly increase participation in other EE programs. However, we are currently exploring the possibility that online CFL redeemers may be more open to other online offers. On the other hand, audit type programs clearly exhibit persistent "gateway" effects over time. They are especially powerful if followed by DR offers. Audit programs also appear to accelerate CFL adoption, again with diminishing returns over time.

Lessons Learned

As mentioned earlier, the best way to accurately measure the "gateway" effect is through experimental design and construction of a treatment group coupled with comparable control group. Unfortunately, time and resources may not be available to implement this methodology. In reality, the order of campaigns is mostly random, with little consideration about correlation between various program offerings. This risk is mitigated by a robust campaign data management system that makes it possible to construct treatment and control groups without experimental design. Furthermore, there are data issues related to data quality and how the campaign data is tracked.

Duke Energy has a robust campaign management system that captures detailed and rich campaign information at the individual account level. This enables us to leverage existing information in the billing system and make inferences with a data cleaning process to eventually derive insights as described in this paper. To improve the existing system, we listed the major challenges related to data that can possibly bias the results and make the analysis difficult. We recommend careful handling of these data issues in order to measure campaign success more accurately.

Consistently, there are challenges to link campaign solicitations and participants. In most marketing campaigns, especially direct mail, there is a group who receive the offer and another group who actually accept the offer. With multiple campaigns, the second group is often a subset of the first group. One notable exception we recently experienced with is an internet CFL offer is that customers forwarded it to friends and family. At a minimum, researchers would like to know which campaign a customer responds to. For example, if there is a CFL campaign at the beginning of year, then another in summer, it is important to know whether the customer who participated in August responded to the first or second campaign or the combination of the two.

A dump of campaign data without real time tracking can be misleading. In some cases, the vendor tracking the data may only load data once a week, once a month, or in extreme cases once a year. If a fixed participation date is assigned to a group of participants as opposed to their actual participation date then important information on timing would be lost. This also obscures the true "gateway" effect because the order of participation becomes unreliable.

Duke Energy Kentucky
Case No. 2012-085
Staff First Set Data Requests
Date Received: April 13, 2012

STAFF-DR-01-009

REQUEST:

Refer to page 12, lines 7-10, of the Ossege Testimony. It states, "[t]he initial estimates of participation and initial estimates of measure/program level load impacts are used to develop the projected benefits (avoided costs) to determine the incentive amounts included in the proposed rider."

a. Explain whether the incentives referenced in this sentence are Duke Kentucky's shared savings or incentives to customers for participation in certain programs.

b. Explain whether the impacts are used in determining lost revenues.

RESPONSE:

a. Incentives refer to Duke Energy Kentucky's shared savings.

b. Yes, the initial estimates of load impacts are used in determining the projected lost revenues.

PERSON RESPONSIBLE: Ashlie J Ossege

Duke Energy Kentucky
Case No. 2012-085
Staff First Set Data Requests
Date Received: April 13, 2012

STAFF-DR-01-010

REQUEST:

Refer to page 19 of the Ossege Testimony. There is a list of residential and non-residential programs that were analyzed.

a. Explain whether the combining of programs to form another program affects the kW impacts of any program, whether it be an increase or decrease.

b. Explain whether the combining of programs to form another program affected the kWh or Ccf impacts per participant and whether that affected lost revenues.

RESPONSE:

The programs were not combined to form another program. The programs were categorized on page 19 into Conservation and Demand Response and Residential and Non-Residential for the reader. The programs were analyzed individually as depicted in attachment AJO-5 and AJO-6.

PERSON RESPONSIBLE: Ashlie J. Ossege

Duke Energy Kentucky
Case No. 2012-085
Staff First Set Data Requests
Date Received: April 13, 2012

STAFF-DR-01-011
PUBLIC

REQUEST:

Refer to page 5, lines 4-8, of the Direct Testimony of Casey Mather ("Mather Testimony"). It states, "[i]n addition to the current Energy Efficiency Education program, Duke Energy Kentucky is adding a live, theatrical production category to the program. Each performance is performed by two professional actors and lasts approximately 25 minutes. The performances enforce lessons learned in the classroom."

a. Explain how many live performances Duke Kentucky is considering.

b. Provide the projected cost per live performance and how the cost would be charged.

c. Explain whether there is any potential liability Duke Energy might incur using professional actors in a live performance in a classroom setting.

d. Explain whether there is a contract between Duke Kentucky and The National Theatre for Children, and if so, provide a copy of the contract.

e. If a contract has been signed with The National Theatre for Children, explain whether there is a regulatory out-provision in the contract if approval of the theatrical production category is not approved by the Commission.

f. Explain whether Duke Kentucky has consulted and/or sought approval from schools systems, schools where live performances would occur, site based councils, and parent-teacher organizations in the Duke Kentucky operating area.

g. Explain whether Duke Kentucky considered other options that might be more cost effective to enforce lessons learned, such as video-taping a live performance by two professional actors and then playing the video in the classroom.

h. Explain whether a theatrical production category with live performances might be considered for a limited automatic approval process for a pilot program.

i. Explain whether the theatrical production category with live performances is cost effective.

RESPONSE:

a. Duke Energy Kentucky will complete an estimated 6 live theatrical performances per academic year. The Fall and Spring semesters will each have 3 performances.

b. The National Theatre for Children's compensation is based on the number of Duke Energy Kentucky Energy Efficiency Starter Kits shipped directly to our customers who are eligible. This model ensures that kWh savings offset the cost of the program. As such, there are no direct charges for live performances.

c. Performances are staged in each school's normal, designated assembly area and occur only with the approval and under the direction of a school's principal. The program is currently operating in Duke Energy Ohio, North and South Carolina and we have not encountered any liability related issues. The program does contain curriculum materials that are used by teachers in the classroom and these materials are provided to the school prior to the live theatrical performance. The principal will be responsible for distribution to teachers.

e. The contract includes the option to expand to additional states if Commission approval for the program is granted.

f. Duke Energy Kentucky has not consulted or sought approval with educators in our Kentucky operating area. If the Commission approves the program, Duke Energy Kentucky would reach out to school principals. The principal is the one responsible for setting up all school assemblies. One of the successful features of this program is that it has relieved teachers of program 'ownership,' provided them with supplemental material to assist their educational curriculum and allowed them to focus on instruction. Duke Energy Kentucky's program is available to the entire school (public or private) engaging all students, families and communities to come together and begin adopting energy efficiency habits through education.

g. Live theatrical performances create a memorable, high involvement experience that has proven effective in energy literacy and engaging students to make sound choices about energy consumption. During the live theatrical performance students are asked to participate and volunteers are requested. Duke Energy's 'pay for results' contract with the National Theater for Children ensures that program costs are incurred only if Energy Efficiency Kits are delivered to our customer. Duke Energy's selection of The National Theater for Children was the result of a selection process that evaluated several program vendors who represented various approaches and treatments. Our experience with this program has validated that selection.

h. Given Duke Energy's experience from 1,500 performances in nearly 1,000 schools, the program's 'pay for result' vendor construct and feedback from educators, students and customers we do not believe that the level of program uncertainty necessitates a pilot. However, Duke Energy would certainly be agreeable to a pilot if that were the Commission's preference.

i. Overall, the program is currently not cost effective. However, adding the theatrical production category to the existing program will improve the overall cost effectiveness of the program. The contract structure with The National Theatre for Children is based on Energy Efficiency Starter Kits shipped directly to customer homes. If Duke Energy Kentucky does not receive kWh savings through the distribution of Energy Efficiency Starter Kits shipped, programs costs will not be incurred.

CONFIDENTIAL PROPRIETARY TRADE SECRET

d. This response has been filed with the Commission under a Petition for Confidential Treatment.

PERSON RESPONSIBLE: Casey Mather
Legal

Duke Energy Kentucky
Case No. 2012-085
Staff First Set Data Requests
Date Received: April 13, 2012

STAFF-DR-01-012
PUBLIC

REQUEST:

Refer to page 6, lines10-11, of the Mather Testimony. It states, "[t]he Appliance Recycling program will encourage customers to responsibly dispose of older, functioning but inefficient refrigerators and freezers."

a. Explain whether Duke Energy has begun the process of contracting a vendor to pick up the refrigerators and freezers.

b. If the answer to part a. is yes, explain how a vendor or vendors will be selected.

c. Provide a copy of any contract(s) signed with vendor(s) for pick-up of inefficient refrigerators and freezers.

d. Explain how the material is recycled and whether Duke Kentucky receives any funds for the recycled scrap, and if so, explain how it is accounted for.

e. Explain whether there is a fee to dispose of material that is not recycled and placed in a landfill and, if so, explain how that fee is accounted for.

RESPONSE:

a. Duke Energy Kentucky has completed the process and has selected JACO Environmental, Inc.

b. The vendor was selected using a competitive bid process. Duke Energy Kentucky issued an RFP that specified our requirements which included price and multi-state capability.

d. JACO Environmental, Inc. is responsible for recycling, reclaiming and disposing of materials. Several processes are required to recycle materials. All work is performed at JACO facilities. Duke Energy Kentucky does not receive any funds from the scrap value of the appliances.

e. The only materials that are not recycled and require disposal are fiberglass insulation and door gaskets. These materials are considered fluff. Fluff is beneficial since it is used to create layered air gaps in the landfill to help with material decomposition. Consequently, there are no landfill fees for its disposal.

CONFIDENTIAL PROPRIETARY TRADE SECRET

c. This response has been filed with the Commission under a Petition for Confidential Treatment.

PERSON RESPONSIBLE: Casey Mather
Legal

Duke Energy Kentucky
Case No. 2012-085
Staff First Set Data Requests
Date Received: April 13, 2012

STAFF-DR-01-013

REQUEST:

Refer to page 6, lines 19-23, and page 7, lines 1-4, of the Mather Testimony. Mr. Mather states:

> [t]he My Home Energy Report compares household electric usage to similar, neighboring homes, and provides recommendations to lower energy consumption. The report also promotes the Company's other energy efficiency programs when applicable. These normative comparisons are intended to induce an energy consumption behavior change. The My Home Energy Report will be delivered in printed or online form to targeted customers with desirable characteristics who are likely to respond to the information. The printed reports are distributed up to 12 times per year; however delivery may be interrupted during the off-peak energy usage months in the fall and spring.

a. Explain whether all residential customers can participate in this program and how targeted customers are chosen.

b. Explain what is meant by "desirable characteristics."

c. Explain how comparing household electric usage to similar neighboring homes is accomplished without revealing confidential customer information that is subject to privacy laws.

d. Explain how this information will be used to induce energy consumption behavior change.

e. Explain whether additional employees will be required to handle the reports, and if so, explain how the cost of these additional employees will be charged.

RESPONSE:

a. All customers are not eligible for the My Home Energy Report. In order to deliver meaningful and insightful comparative information there needs to be sufficient commonality and usage history among accounts. Eligibility is defined as single family residences with active, single meter, non commercial accounts. At this time customers on payment plans are also excluded to

minimize customer confusion. Payment plan participants and non single family residences will be considered in the future.

b. Desirable characteristics are the eligibility criteria above.

c. All homes participating in the program are grouped in clusters and an aggregate is used for comparison purposes, so no confidential customer information is revealed. For example, if there are 10 homes in the cluster and the average home (50^{th} percentile) uses $100 a month, then only that dollar amount is shown on the report, never any specific characteristics about that home. It does show key demographics of homes used in the cluster. So it will show the number of homes in the cluster, with square footage ranging from 500-1000 square feet, being built between 1950-1960, and have electric heat. Specific home information or home location is not shared.

d. The program's theory for successful energy reduction rests upon the concept of "social norms." A large body of research in the social sciences has shown that people tend to conform to the social norms around them. This program has been piloted for almost 2 years in Ohio and South Carolina and has proven to reduce energy usage. In addition, a number of utilities have leveraged this effect and found that customers can reduce energy use anywhere between 1.5 to 2.5% when they can compare their energy usage to the social norm of similar homes. In addition to using normative comparisons to engage customers and motivate behavior change, the reports also empower customers by providing them with useful, targeted seasonal tips and information to help them achieve lower energy use.

e. A product manager and data analyst support the program. Program delivery is also supported by a vendor. Program costs, including labor, are shared among other jurisdictions. Rules based automation is used to control production cost and ensure timely report delivery.

PERSON RESPONSIBLE: Casey Mather

Duke Energy Kentucky
Case No. 2012-085
Staff First Set Data Requests
Date Received: April 13, 2012

STAFF-DR-01-014

REQUEST:

Refer to page 7, lines 13-1 5, of the Mather Testimony wherein Mr. Mather states:

> [t]argeted low income neighborhoods qualify for the program if at least 50% of the households are at or below 200% of the federal poverty guidelines. Duke Energy Kentucky will analyze electric usage data and previous program participation to prioritize neighborhoods that have the greatest need and propensity to participate. While the goal is to serve neighborhoods where the majority of residents are lower income, the program is available to all Duke Energy Kentucky customers in the defined neighborhood.

a. Explain how a residential area is defined as a neighborhood.

b. Explain the process of targeting a defined neighborhood.

c. Explain how the electric usage data will be analyzed and used in determining a defined neighborhood.

d. Once a neighborhood is selected as a defined neighborhood, explain how a customer is selected based on energy usage history and how a customer's energy usage will be used in determining what measures will be provided.

e. Explain whether Duke Kentucky is working with any Community Action Agencies in defining and selecting a neighborhood and organizing kick-off events.

RESPONSE:

a. A neighborhood is defined as an area of approximately 100 – 500 homes where a significant number of households are at or below 200% of poverty level.

b. The primary considerations for defining a neighborhood are census block, energy usage, prior energy efficiency program participation and GIS data. As appropriate qualitative considerations will also be included. For instance, significant geographic boundaries such as major thoroughfares, the use of Google Earth street level views to identify physical traits of homes or expert

level input from community leaders, low income service organizations and Duke Energy's Community Relation Managers will be used to identify program neighborhoods.

c. Electric usage history is reviewed to determine those areas where average annual electric use and seasonal electric use are high taking into account housing characteristics like size and age.

d. Once a neighborhood is selected, all homes within the defined boundaries will be eligible to participate. Customers within the neighborhood may elect not participate though experience suggests that a majority will participate. We also anticipate exceptions. For example, if a customer located adjacent to a neighborhood requests to participate they will be accommodated. For any customer choosing to participate, opportunities identified in the home walk-through process and subsequent customer acceptance will determine the type and number measures that are installed.

e. Duke Energy Kentucky will employ a third party vendor to serve as the administrator for the program. The responsibilities of the selected vendor will include assisting with the selection of neighborhoods as well as organizing kick-off events. However, Duke Energy Kentucky does recognize the benefit of engaging organizations that have experience and understand the local community. Given the nature of this program, local leader buy-in and inclusion is an important element to establish trust and participation.

PERSON RESPONSIBLE: Casey Mather

Duke Energy Kentucky
Case No. 2012-085
Staff First Set Data Requests
Date Received: April 13, 2012

STAFF-DR-01-015

REQUEST:

Refer to page 3, lines 20-22, of the Direct Testimony of Kevin A. Bright ("Bright Testimony"). It states, "Duke Energy Kentucky seeks to expand the measures included in the Smart $aver® Prescriptive program to include over 220 measures covering the five broad technology categories." Explain whether all 220 measures covering the five broad technology categories have been determined as cost effective.

RESPONSE:

All measures included in the Smart $aver® Prescriptive program were tested for cost-effectiveness.

PERSON RESPONSIBLE: Kevin A. Bright

Duke Energy Kentucky
Case No. 2012-085
Staff First Set Data Requests
Date Received: April 13, 2012

STAFF-DR-01-016

REQUEST:

Refer to page 4, lines 11-13, of the Bright Testimony. Mr. Bright states: "[a] key difference between the Prescriptive and Custom programs is that the Custom program requires that the customer submit an application before they begin their project." On page 4, lines 4-6, of the Bright Testimony, it states, "The incentive amounts are known to the customer before they undertake their project, so the customer can proceed with their project and submit documentation after installation." Explain how the customer knows the incentive amount without submitting an application.

RESPONSE:

The incentive amounts offered for the Smart $aver® Prescriptive measures are specified on the application forms which are available on the Smart $aver website. Customers and trade allies are encouraged to reference the application documents during project planning.

PERSON RESPONSIBLE: Kevin A. Bright

Duke Energy Kentucky
Case No. 2012-085
Staff First Set Data Requests
Date Received: April 13, 2012

STAFF-DR-01-017

REQUEST:

Refer to page 5, lines 3-7, of the Bright Testimony. It states, "Duke Energy Kentucky recently filed an application to implement this program as a pilot in Case No. 2011-00471.[1] Now, with this filing requesting to expand the entire portfolio of EE and DR programs, Duke Energy Kentucky seeks to expand this program to all eligible commercial and industrial customers on a more permanent basis." [Footnote added.] Explain why Duke Kentucky seeks to expand this program to all eligible commercial and industrial customers on a more permanent basis.

RESPONSE:

Duke Energy Kentucky sought pilot approval of a Custom Incentive program for an expanded audience in order to begin building a program pipeline and in response to customer requests. The time frame of the recently approved pilot was requested in anticipation of a permanent Custom Incentive program. Duke Energy has seen significant and continued program participation in other jurisdictions and believes that an ongoing program will provide significant customer benefits and promote energy efficiency well beyond the June 30, 2013, expiration of the pilot program approved in Case 2011-00471. Additionally, the ongoing Custom Incentives program will replace and end the pilot program upon approval.

PERSON RESPONSIBLE: Kevin Bright

[1] Case No. 2011-00471, Application of Duke Energy Kentucky, Inc. to Implement a Pilot Nonresidential Smart Saver Custom Energy Efficiency Program (Ky. PSC April 12, 2012).

Duke Energy Kentucky
Case No. 2012-085
Staff First Set Data Requests
Date Received: April 13, 2012

STAFF-DR-01-018

REQUEST:

Refer to page 5, line 23, and page 6, line 4, of the Bright Testimony. Mr. Bright states:

> [t]he cost of the on-site assessment varies depending on the length of time an assessor spends at a customer's facility. The cost of the audit is shared by Duke Energy Kentucky and the customer. The customer pays 50% of the cost, and Duke Energy Kentucky pays 50%, but the customer's cost can be further reduced if they proceed with adopting the recommendations made in the audit.

Provide and explain the possible range of costs per audit that could be the responsibility of the customer and the costs that could be recovered through the DSM rider.

RESPONSE:

The approximate potential range of customer costs per audit effort is $3,000 - $25,000. More expensive audits are reflective of highly detailed efforts that require intense modeling and engineering work.

Annual DSM rider costs are budgeted under $15,000 starting in 2013 with escalation of 5% assumed thereafter. This assumption assumes the exclusion of specialized assessment campaigns mentioned in the filing. If those campaigns are proven to yield sufficient results via current tests underway in other markets, total Energy Assessments are not expected to exceed $200,000 annually.

PERSON RESPONSIBLE: Kevin Bright

Duke Energy Kentucky
Case No. 2012-085
Staff First Set Data Requests
Date Received: April 13, 2012

STAFF-DR-01-019

REQUEST:

Refer to page 7, line 13, of the Bright Testimony. Duke Kentucky is exploring a possible expansion of the Powershare program. Explain when a possible expansion might be implemented and how the Commission would be notified.

RESPONSE:

The potential being considered is for an Automated Demand Response (AutoDR) program which would be for the June 2013 program year, or the following year, depending upon the results from the pilot being conducted in Duke Energy Ohio during the Summer of 2012. Any planned changes that expand the reach of the program would be shared with the Collaborative group before program roll-out. At this time, it is envisioned that the new offering would fit under existing Rider PLM.

PERSON RESPONSIBLE: Kevin Bright

Duke Energy Kentucky
Case No. 2012-085
Staff First Set Data Requests
Date Received: April 13, 2012

STAFF-DR-01-020

REQUEST:

Refer to page 7, line 21, and page 8, line 1, of the Bright Testimony. Mr. Bright states: "it is possible that Duke Energy Kentucky may need to change incentives in the future which would be filed in a revised tariff. At this time, two programs in particular are expected to be impacted in the 2012/2013 fiscal year."

a. One program to be impacted is the Powershare program. Identify the other program to be affected.

b. Explain whether incentives might be changed and whether the cost effectiveness of the programs might be impacted.

c. Explain the impact on Duke Kentucky's shared savings if the incentives are changed.

RESPONSE:

a. Please reference page 8, lines 1 through 10. The program referenced is the Smart $aver® Prescriptive program.

b. Currently, Duke Energy Kentucky offers incentives for the replacement of T12 lamps and ballasts. Effective July 14, 2012, T12 lamps will no longer be manufactured in or imported into the United States. At that time, Duke Energy Kentucky will phase out the incentives for standard T8 fixtures replacing T12 fixtures. Rebates for high performance or reduced wattage T8 fixtures replacing T12 fixtures will continue, but will be reduced and the energy savings assumed for these measures will be calculated assuming replacement of standard T8 rather than T12.The change described above results in the removal of certain incentives from the Prescriptive portfolio and decreasing energy impacts and incentives for others. When impacts or incentives are adjusted, cost-effectiveness is re-evaluated.

c. Measures that are removed from the portfolio will not produce shared savings. For the high performance and reduced wattage T8 fixtures mentioned above, both the energy savings and the incentives will be reduced from current levels. Shared

savings are estimated to remain about the same since incentives and impacts are both reduced. Any measure with proposed increase or decrease in energy savings or incentives is tested for cost-effectiveness before the change is implemented.

PERSON RESPONSIBLE: Kevin A. Bright

Duke Energy Kentucky
Case No. 2012-085
Staff First Set Data Requests
Date Received: April 13, 2012

STAFF-DR-01-021

REQUEST:

Refer to page 4, lines 12-13, of the Direct Testimony of James A. Ziolkowski ("Ziolkowski Testimony"). Mr. Ziolkowski states: "[t]he revenue requirement recovers program costs, lost revenues, measurement and verification costs, and incentives." In its application in Case No. 2011-00448,[1] Duke Kentucky provided Appendix B, page 2 of 6, which includes projected program costs, lost revenues, and shared savings for 2012. Appendix B also provides an allocation of costs between electric and gas customers.

a. Provide a similar schedule of program costs, lost revenues, and shared savings for the programs proposed in this case.

b. Provide a schedule, in electronic format with formulas intact and unprotected, of the total DSM revenue requirement amounts on Attachment JEZ-I, page 8, by program, consisting of program costs, lost revenues, and shared savings.

RESPONSE:

The data is not currently available in the requested format. To display this data in the requested format will take two to three weeks to produce. The Company will provide this information in a supplemental response on or before May 15, 2012.

PERSON RESPONSIBLE: James E. Ziolkowski

[1] Case No. 2011-00448, Application of Duke Energy Kentucky, Inc. for the Annual Cost Recovery Filing for Demand-Side Management (Ky. PSC April 13,2012).

Duke Energy Kentucky
Case No. 2012-085
Staff First Set Data Requests
Date Received: April 13, 2012

STAFF-DR-01-022

REQUEST:

Refer to Attachment JEZ-2 of the Ziolkowski Testimony, pages 1-4 of 8, referencing Case No. 2006-00172[1] and Attachment JEZ-2, pages 5-8 of 8, referencing Case No. 2009-00202.[2]

a. Page 2 of the tariff states, "[r]ecovery of revenues from lost sales calculated for a twelve-month period for non-residential rate classes shall be included in the LR until January 1, 2000 or until terminated by the implementation of new rates pursuant to a general rate case, whichever comes first." Explain the January 1, 2000 date, since the last electric general rate case was Case No. 2006-00172[3] and the last gas general rate case was Case No. 2009-00202.[4]

b. Refer to pages 3 and 6 of Attachment JEZ-2. The tariff states, "[t]he DSM Program Incentive (PI) amount shall be computed by multiplying the net resource savings expected from the approved programs which are to be installed during the upcoming twelvemonth period times fifteen (15) percent." Explain the 15 percent considering that in Case No. 2004-00389,[5] on page 37 of the Application, it states, "ULH&P proposes to recover ten percent of the savings, a sharing of the value created, as an incentive to aggressively pursue implementation of DSM programs" and that 10 percent is used to calculate shared savings in this Application.

RESPONSE:

a. Attachment JEZ-2 is a copy of the Company's existing Rider DSM, Sheet No. 75. Some of the verbiage in this tariff sheet is out of date and needs to be corrected.

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[1] Case No. 2006-00172, Application of the Union Light, Heat and Power Company D/B/A Duke Energy Kentucky for an Adjustment of Electric Rates (Ky. PSC Dec. 21, 2006).
[2] Case No. 2009-00202, Application of Duke Energy Kentucky, Inc. for an Adjustment of Rates (Ky. PSC Dec. 29, 2009).
[3] Case No. 2006-00172, Union Light, Heat and Power Company d/b/a Duke Energy Kentucky (Ky. PSC Dec. 21, 2006).
[4] Case No. 2009-00202, Duke Energy Kentucky, Inc. (Ky. PSC Dec. 29, 2009).
[5] Case No. 2004-00389, The Annual Cost Recovery Filing for Demand Side Management by the Union Light, Heat and Power Company (Ky. PSC Feb. 14, 2005).

b. Please see the response to part (a).

PERSON RESPONSIBLE: James E. Ziolkowski

Duke Energy Kentucky
Case No. 2012-085
Staff First Set Data Requests
Date Received: April 13, 2012

STAFF-DR-01-023

REQUEST:

Refer to Attachment JEZ-2, pages 6-7, of the Ziolkowski Testimony. Duke Kentucky's gas tariff states that program benefits for calculation of the DSM Program Incentive ("PI") will be the present value of Duke Kentucky's avoided cost over the life of the program and will include both commodity and capacity costs. Provide the PI calculations for both the residential and non-residential gas customers, so that the commodity and capacity costs, discount rate, and program life can be identified. Include the source document(s) of the avoided commodity and capacity costs if it is something other than Duke Kentucky's own Gas Cost Recovery rate.

RESPONSE:

Pages 6-7 of Attachment JEZ-2 are copies of pages contained in the Company's gas Rider DSM, Second Revised Sheet No. 61. These pages contain language describing the DSM Program Incentive to be recovered in the gas Rider DSMR charge.

The proposed gas Rider DSMR charge recovers only gas-related program costs. The proposed gas charge does not recover Program Incentives.

The relatively small amount of gas-related program incentives are combined with the electric incentives and recovered through the electric Rider DSMR charge.

The response the STAFF-DR-01-021, when available, will provide more detail regarding gas-related Program Incentives.

PERSON RESPONSIBLE: James E. Ziolkowski

Duke Energy Kentucky
Case No. 2012-085
Staff First Set Data Requests
Date Received: April 13, 2012

STAFF-DR-01-024

REQUEST:

Refer to Duke Kentucky's response to Item 44 of Commission Staff's First Information Request in its pending Integrated Resource Plan case.[1] Identify and describe what impacts Duke Kentucky has experienced in the Power Share program as a result of its move from the Midwest Independent System Operator to PJM as it relates to participation and cost effectiveness.

RESPONSE:

In Duke Energy Kentucky's response to Item 44 of Commission Staff's First Information Request in its pending Integrated Resource Plan case, Duke Energy Kentucky stated that we anticipate little if any impact on the PowerShare program due to the transition from Midwest ISO to PJM. Duke Energy Kentucky further stated that participation increased from the 2010 planning year (i.e., June 2010 to May 2011) to the 2011 planning year. Participation has again increased from the 2011 planning year to the 2012 planning year. The transition to PJM appears not to have impacted participation. The increased availability for emergency events and the reduced notification time have not resulted in a negative impact on participation over the last 2 years under prevailing economic conditions.

Regarding cost effectiveness, the PowerShare program remains cost effective. Duke Energy Kentucky references 2 recent cases that contain information on the PowerShare program and cost effectiveness results. Please reference Case No. 2011-00448, *Duke Energy Kentucky's Annual Cost Recovery Filing for Demand Side Management* proceeding, and Case No. 2012-00085, *Duke Energy Kentucky's Application of Duke Energy Kentucky, Inc., for an Energy Efficiency Cost Recovery Mechanism and for Approval of Additional Programs for Inclusion in its Existing Portfolio Energy Efficiency Portfolio* proceeding.

PERSON RESPONSIBLE: Bruce L. Sailers

[1] Case No. 2011-00235, *2011 Integrated Resource Plan of Duke Energy Kentucky, Inc.* (filed July 1, 2011).

Duke Energy Kentucky
Case No. 2012-085
Staff First Set Data Requests
Date Received: April 13, 2012

STAFF-DR-01-025
PUBLIC

REQUEST:

Provide, in electronic format with formulas intact and unprotected, how the kWh and Ccf impacts were determined for each program, by program participant. Also, explain if this is how lost revenues were determined for each program. If not, explain how lost revenues were determined by program.

RESPONSE:

Program managers and analysts develop the inputs for each program or measure from industry information derived from sources such as Electric Power Research Institute (EPRI), Energy Star, E-Source, other utility program information and evaluations, contiguous state TRMs, engineering building simulations models, as well as from external experts in the industry. These values were then input into the DSMore™ model.

Staff-DR-01-025a provides a dictionary pointing to the source documentations that was used to determine the impacts for each program measure.

Lost revenue was calculated using outputs from the DSMore™ model for estimated energy savings. Duke Energy Kentucky retail rates were used less fuel and variable O&M on DSMore impacts over the 3 years. Lost revenues were shifted to account for day 1 of fiscal year start date for all participants.

CONFIDENTIAL PROPRIETARY TRADE SECRET

This response has been filed with the Commission under a Petition for Confidential Treatment.

PERSON RESPONSIBLE: Ashlie J Ossege
James E. Ziolkowski
Legal

Program Name	Measure/Category Name	Unit of Measure
Appliance Recycling Program	Refrigerator Recycle	per refrigerator
Appliance Recycling Program	Freezer Recycle	per freezer
Energy Efficiency Education Program for Schools	K-12 Education Program- Curriculum	K12 EE kit
Energy Efficiency Education Program for Schools	K-12 Education Program- Theatre	K12 EE kit
Low Income Neighborhood	Low Income Neighborhood	per participant
Low Income Services	Low Income Weatherization	per participant
Low Income Services	Low Income Refrigerator Replacement	per refrigerator
My Home Energy Report	My Home Energy Report	per participant
Residential Energy Assessments	Home Energy House Call	EE kit
Residential Smart Saver ®	Property Manager 13WCFL	per 13W cfl bulb
Residential Smart Saver ®	RCFL - Specialty Bulbs	per bulb
Residential Smart Saver ®	RCFL Opt-In Free CFLs	per avg cfl bulb
Residential Smart Saver ®	Smart Saver - Attic Insul & Air Seal	per house
Residential Smart Saver ®	Smart Saver - Central Air Conditioner Tune UP	per unit
Residential Smart Saver ®	Smart Saver - Central Air Conditioner	per HVAC system
Residential Smart Saver ®	Smart Saver - Duct Insulation	Per house
Residential Smart Saver ®	Smart Saver - Duct Sealing	per house
Residential Smart Saver ®	Smart Saver - Heat Pump Tune UP	per unit
Residential Smart Saver ®	Smart Saver - Heat Pump	per HVAC system
Smart Saver ® Prescriptive	1.5 Horse Power High Efficiency Pumps	per pump
Smart Saver ® Prescriptive	10 Horse Power High Efficiency Pumps	per pump
Smart Saver ® Prescriptive	15 Horse Power High Efficiency Pumps	per pump
Smart Saver ® Prescriptive	2 High Bay 6L T-5 High Output replacing 1000W HID	per 2 T8 HB 4' 8L fixtures (ballasts + bulbs)
Smart Saver ® Prescriptive	2 High Bay Fluorescent 8LF32T8 - Replacing 1000W HID	per 2 T8 HB 4' 8L fixtures (ballasts + bulbs)
Smart Saver ® Prescriptive	2 Horse Power High Efficiency Pumps	per pump
Smart Saver ® Prescriptive	20 Horse Power High Efficiency Pumps	per pump
Smart Saver ® Prescriptive	3 Horse Power High Efficiency Pumps	per pump
Smart Saver ® Prescriptive	42W 8 Lamp High Bay Compact Fluorescent	per fixture (ballast + bulb)
Smart Saver ® Prescriptive	5 Horse Power High Efficiency Pumps	per pump
Smart Saver ® Prescriptive	7.5 Horse Power High Efficiency Pumps	per pump
Smart Saver ® Prescriptive	AC 135,000 - 240,000 per ton	per ton
Smart Saver ® Prescriptive	AC 240,000 - 760,000 per ton	per ton
Smart Saver ® Prescriptive	AC 65,000 - 135,000 per ton	per ton
Smart Saver ® Prescriptive	AC greater than 760,000 per ton	per ton
Smart Saver ® Prescriptive	AC less than 65,000 1 Ph per ton	per ton
Smart Saver ® Prescriptive	AC less than 65,000 3 Ph per ton	per ton
Smart Saver ® Prescriptive	Air Cooled Chiller Tune Up per ton	per ton
Smart Saver ® Prescriptive	Air-Cooled Screw Chiller COP = 2.86, IPLV = 3.12 per ton	per ton
Smart Saver ® Prescriptive	Air-Cooled Screw Chiller COP = 2.86, IPLV = 3.48 per ton	per ton
Smart Saver ® Prescriptive	Air-Cooled Screw Chiller COP = 2.86, IPLV = 3.97 per ton	per ton
Smart Saver ® Prescriptive	Air-Cooled Screw Chiller COP = 2.86, IPLV = 4.33 per ton	per ton
Smart Saver ® Prescriptive	Air-Cooled Screw Chiller COP = 3.08, IPLV = 3.36 per ton	per ton
Smart Saver ® Prescriptive	Air-Cooled Screw Chiller COP = 3.08, IPLV = 3.80 per ton	per ton
Smart Saver ® Prescriptive	Air-Cooled Screw Chiller COP = 3.08, IPLV = 4.00 per ton	per ton
Smart Saver ® Prescriptive	Air-Cooled Screw Chiller COP = 3.08, IPLV = 5.22 per ton	per ton
Smart Saver ® Prescriptive	Air-Cooled Screw Chiller COP = 3.36, IPLV = 3.66 per ton	per ton
Smart Saver ® Prescriptive	Air-Cooled Screw Chiller COP = 3.36, IPLV = 4.15 per ton	per ton
Smart Saver ® Prescriptive	Air-Cooled Screw Chiller COP = 3.36, IPLV = 4.42 per ton	per ton
Smart Saver ® Prescriptive	Air-Cooled Screw Chiller COP = 3.36, IPLV = 5.69 per ton	per ton

Smart Saver ® Prescriptive	Anti-sweat Heater Controls	per door
Smart Saver ® Prescriptive	Barrel Wraps (Inj Mold & Extruders) kW per ton	kW per ton
Smart Saver ® Prescriptive	Beverage Reach-in Controller	per controller
Smart Saver ® Prescriptive	CEE Tier 1 Room AC greater than 14,000 Btu per hr	per unit
Smart Saver ® Prescriptive	CEE Tier 1 Room AC less than 14,000 Btu per hr	per unit
Smart Saver ® Prescriptive	CEE Tier 2 Room AC greater than 14,000 Btu per hr	per unit
Smart Saver ® Prescriptive	CEE Tier 2 Room AC less than 14,000 Btu per hr	per unit
Smart Saver ® Prescriptive	Ceramic Metal Halide 20-100W	per lamp
Smart Saver ® Prescriptive	Ceramic Metal Halide Integral Ballast	per lamp
Smart Saver ® Prescriptive	CFL Reflector Flood	per lamp
Smart Saver ® Prescriptive	CFL Screw high wattage	per lamp
Smart Saver ® Prescriptive	CFL Screw in, Specialty	per lamp
Smart Saver ® Prescriptive	Combination Oven (90 lbs_hr)	per oven
Smart Saver ® Prescriptive	Compact Fluorescent Fixture	per fixture (ballast + bulb)
Smart Saver ® Prescriptive	Compact Fluorescent Screw in	per bulb (cfl)
Smart Saver ® Prescriptive	Convection Oven	per oven
Smart Saver ® Custom	Custom Rebate	per project/facility
Smart Saver ® Prescriptive	Delamping T12 2ft to T-8	fixture, Retrofit 2' T12, replacing with T8
Smart Saver ® Prescriptive	Delamping T12 3ft to T-8	fixture, Retrofit 3' T12, replacing with T8
Smart Saver ® Prescriptive	Delamping T12 4ft to T-8	fixture, Retrofit 4' T12, replacing with T8
Smart Saver ® Prescriptive	Delamping T12 8ft to T-8	fixture, Retrofit 8' T12, replacing with T8
Smart Saver ® Prescriptive	Door Gaskets - Cooler and Freezer	per linear foot
Smart Saver ® Prescriptive	ECM Case Motors	per motor
Smart Saver ® Prescriptive	ECM Cooler and Freezer Motors - ECM replacing PSC	per motor
Smart Saver ® Prescriptive	ECM Cooler and Freezer Motors - ECM replacing SP	per motor
Smart Saver ® Prescriptive	ENERGY STAR Commercial Glass Door Freezers 15 to 30 ft3 - var	per unit
Smart Saver ® Prescriptive	ENERGY STAR Commercial Glass Door Freezers 30 to 50ft3 - var	per unit
Smart Saver ® Prescriptive	ENERGY STAR Commercial Glass Door Freezers less than 15ft3 - var	per unit
Smart Saver ® Prescriptive	ENERGY STAR Commercial Glass Door Freezers more than 50ft3 - var	per unit
Smart Saver ® Prescriptive	ENERGY STAR Commercial Glass Door Refrigerators 15 to 30 ft3 - var	per unit
Smart Saver ® Prescriptive	ENERGY STAR Commercial Glass Door Refrigerators 30 to 50ft3 - var	per unit
Smart Saver ® Prescriptive	ENERGY STAR Commercial Glass Door Refrigerators less than 15ft3 - var	per unit
Smart Saver ® Prescriptive	ENERGY STAR Commercial Glass Door Refrigerators more than 50ft3 - var	per unit
Smart Saver ® Prescriptive	ENERGY STAR Commercial Solid Door Freezers 15 to 30 ft3 - var	per unit
Smart Saver ® Prescriptive	ENERGY STAR Commercial Solid Door Freezers 30 to 50ft3 - var	per unit
Smart Saver ® Prescriptive	ENERGY STAR Commercial Solid Door Freezers less than 15ft3 - var	per unit
Smart Saver ® Prescriptive	ENERGY STAR Commercial Solid Door Freezers more than 50ft3 - var	per unit
Smart Saver ® Prescriptive	ENERGY STAR Commercial Solid Door Refrigerators 15 to 30 ft3 - var	per unit
Smart Saver ® Prescriptive	ENERGY STAR Commercial Solid Door Refrigerators 30 to 50ft3 - var	per unit
Smart Saver ® Prescriptive	ENERGY STAR Commercial Solid Door Refrigerators less than 15ft3 - var	per unit
Smart Saver ® Prescriptive	ENERGY STAR Commercial Solid Door Refrigerators more than 50ft3 - var	per unit
Smart Saver ® Prescriptive	Energy Star Room AC over 14,000 Btu hr	per unit
Smart Saver ® Prescriptive	Energy Star Room AC under 14,000 Btu hr	per unit
Smart Saver ® Prescriptive	Engineered Nozzles - COMPRESS AIR	per nozzle
Smart Saver ® Prescriptive	Exterior HID replacement above 175W to 250W HID retrofit	per fixture
Smart Saver ® Prescriptive	Exterior HID replacement above 250W to 400W HID retrofit	per fixture
Smart Saver ® Prescriptive	Exterior HID replacement above 400W HID retrofit	per fixture
Smart Saver ® Prescriptive	Exterior HID replacement to 175W HID retrofit	per fixture

Smart Saver ® Prescriptive	Fryer	per fryer
Smart Saver ® Prescriptive	Garage HID replacement above 175W to 250W HID retrofit	per fixture
Smart Saver ® Prescriptive	Garage HID replacement above 250W to 400W HID retrofit	per fixture
Smart Saver ® Prescriptive	Garage HID replacement above 400W HID retrofit	per fixture
Smart Saver ® Prescriptive	Garage HID replacement to 175W HID retrofit	per fixture
Smart Saver ® Prescriptive	Griddles	per griddle
Smart Saver ® Prescriptive	Guest Room Energy Management, Electric Heating	per unit
Smart Saver ® Prescriptive	Guest Room Energy Management, Gas Heating	per unit
Smart Saver ® Prescriptive	High Bay 2L T-5 High Output	per fixture (ballast + bulb)
Smart Saver ® Prescriptive	High Bay 3L T-5 High Output	per fixture (ballast + bulb)
Smart Saver ® Prescriptive	High Bay 4L T-5 High Output	per fixture (ballast + bulb)
Smart Saver ® Prescriptive	High Bay 6L T-5 High Output	per fixture (ballast + bulb)
Smart Saver ® Prescriptive	High Bay 8L T-5 High Output	per fixture (ballast + bulb)
Smart Saver ® Prescriptive	High Bay T8 4ft Fluorescent 3 Lamp (F32 Watt T8)	per fixture (ballast + bulb)
Smart Saver ® Prescriptive	High Bay T8 4ft Fluorescent 4 Lamp (F32 Watt T8)	per fixture (ballast + bulb)
Smart Saver ® Prescriptive	High Bay T8 4ft Fluorescent 6 Lamp (F32 Watt T8)	per fixture (ballast + bulb)
Smart Saver ® Prescriptive	High Bay T8 4ft Fluorescent 8 Lamp (F32 Watt T8)	per fixture (ballast + bulb)
Smart Saver ® Prescriptive	High Efficiency Commercial Electric Water Heater 4.5 kW EF 0.93	per unit
Smart Saver ® Prescriptive	High Performance Low Watt T8 4ft 1 lamp, replacing standard T8	per fixture (ballast + bulb)
Smart Saver ® Prescriptive	High Performance Low Watt T8 4ft 2 lamp, replacing standard T8	per fixture (ballast + bulb)
Smart Saver ® Prescriptive	High Performance Low Watt T8 4ft 3 lamp, replacing standard T8	per fixture (ballast + bulb)
Smart Saver ® Prescriptive	High Performance Low Watt T8 4ft 4 lamp, replacing standard T8	per fixture (ballast + bulb)
Smart Saver ® Prescriptive	High Performance T8 4ft 1 lamp, replacing standard T8	per fixture (ballast + bulb)
Smart Saver ® Prescriptive	High Performance T8 4ft 1 lamp, replacing T12-HPT8	per fixture (ballast + bulb)
Smart Saver ® Prescriptive	High Performance T8 4ft 2 lamp, replacing standard T8	per fixture (ballast + bulb)
Smart Saver ® Prescriptive	High Performance T8 4ft 2 lamp, replacing T12 8ft 1 lamp	per fixture (ballast + bulb)
Smart Saver ® Prescriptive	High Performance T8 4ft 2 lamp, replacing T12 High Output 8ft 1 lamp	per fixture (ballast + bulb)
Smart Saver ® Prescriptive	High Performance T8 4ft 2 lamp, replacing T12-HPT8	per fixture (ballast + bulb)
Smart Saver ® Prescriptive	High Performance T8 4ft 3 lamp, replacing standard T8	per fixture (ballast + bulb)
Smart Saver ® Prescriptive	High Performance T8 4ft 3 lamp, replacing T12-HPT8	per fixture (ballast + bulb)
Smart Saver ® Prescriptive	High Performance T8 4ft 4 lamp, replacing standard T8	per fixture (ballast + bulb)
Smart Saver ® Prescriptive	High Performance T8 4ft 4 lamp, replacing T12 8ft 2 lamp	per fixture (ballast + bulb)
Smart Saver ® Prescriptive	High Performance T8 4ft 4 lamp, replacing T12 High Output 8ft 2 lamp	per fixture (ballast + bulb)
Smart Saver ® Prescriptive	High Performance T8 4ft 4 lamp, replacing T12-HPT8	per fixture (ballast + bulb)
Smart Saver ® Prescriptive	Holding Cabinet Full Size Insulated	per unit (cabinet)
Smart Saver ® Prescriptive	Holding Cabinet Half Size Insulated	per unit (cabinet)
Smart Saver ® Prescriptive	Holding Cabinet Three Quarter Size Insulated	per unit (cabinet)
Smart Saver ® Prescriptive	HP 135,000 - 240,000 per ton	per ton
Smart Saver ® Prescriptive	HP 65,000 - 135,000 per ton	per ton
Smart Saver ® Prescriptive	HP greater than 240,000 per ton	per ton
Smart Saver ® Prescriptive	HP less than 65,000 1 Ph per ton	per ton
Smart Saver ® Prescriptive	HP less than 65,000 3 Ph per ton	per unit (water heater)
Smart Saver ® Prescriptive	HP Water Heater 10-50 MBH	per unit (water heater)
Smart Saver ® Prescriptive	HP Water Heater 100-300 MBH	per unit (water heater)
Smart Saver ® Prescriptive	HP Water Heater 300-500 MBH	per unit (water heater)
Smart Saver ® Prescriptive	HP Water Heater 50-100 MBH	per unit (water heater)
Smart Saver ® Prescriptive	HP Water Heater greater than 500 MBH	per ice maker
Smart Saver ® Prescriptive	Icemaker (100 to 500 lbs_day)	per ice maker
Smart Saver ® Prescriptive	Icemaker (500 to 1000 lbs_day)	per ice maker
Smart Saver ® Prescriptive	Icemaker (Greater Than 1000 lbs_day)	

Smart Saver ® Prescriptive	LED Auto Traffic Signals	per lamp
Smart Saver ® Prescriptive	LED Case lighting sensor control	per door
Smart Saver ® Prescriptive	LED Case lighting	per door
Smart Saver ® Prescriptive	LED Downlight	per lamp
Smart Saver ® Prescriptive	LED Exit Signs Electronic Fixtures (Retrofit Only)	per fixture
Smart Saver ® Prescriptive	LED Lamps	per lamp
Smart Saver ® Prescriptive	LED Pedestrian Signals	per signal
Smart Saver ® Prescriptive	Light Tube	per light tube
Smart Saver ® Prescriptive	Low Watt T8 lamps 2-4ft, replacing standard 32 Watt T8	per bulb
Smart Saver ® Prescriptive	LW HPT8 4ft 1 lamp, Replace T12	per fixture (ballast + bulb)
Smart Saver ® Prescriptive	LW HPT8 4ft 2 lamp, Replace T12	per fixture (ballast + bulb)
Smart Saver ® Prescriptive	LW HPT8 4ft 3 lamp, Replace T12	per fixture (ballast + bulb)
Smart Saver ® Prescriptive	LW HPT8 4ft 4 lamp, Replace T12	per fixture (ballast + bulb)
Smart Saver ® Prescriptive	Night covers for displays	per linear foot of case
Smart Saver ® Prescriptive	Occupancy Sensors over 500 Watts	per sensor
Smart Saver ® Prescriptive	Occupancy Sensors under 500 Watts	per sensor
Smart Saver ® Prescriptive	Packaged Terminal AC	per unit
Smart Saver ® Prescriptive	Pellet Dryer Tanks & Ducts 3in dia per ft	per ft
Smart Saver ® Prescriptive	Pellet Dryer Tanks & Ducts 4in dia per ft	per ft
Smart Saver ® Prescriptive	Pellet Dryer Tanks & Ducts 5in dia per ft	per ft
Smart Saver ® Prescriptive	Pellet Dryer Tanks & Ducts 6in dia per ft	per ft
Smart Saver ® Prescriptive	Pellet Dryer Tanks & Ducts 8in dia per ft	per ft
Smart Saver ® Prescriptive	Pre Rinse Sprayers	per unit
Smart Saver ® Prescriptive	Pulse Start Metal Halide 320W retrofit only	per fixture
Smart Saver ® Prescriptive	Setback Programmable Thermostat	per unit (thermostat)
Smart Saver ® Prescriptive	Snack Machine Controller	per controller
Smart Saver ® Prescriptive	Steamer_3 pan	per steam cooker
Smart Saver ® Prescriptive	Steamer_4 pan	per steam cooker
Smart Saver ® Prescriptive	Steamer_5 pan	per steam cooker
Smart Saver ® Prescriptive	Steamer_6 pan	per steam cooker
Smart Saver ® Prescriptive	T-5 4 ft 1 Lamp with Electronic Ballast (replacing T-12 fixture)	per fixture (ballast + bulb)
Smart Saver ® Prescriptive	T-5 4 ft 2 Lamp with Electronic Ballast (replacing T-12 fixture)	per fixture (ballast + bulb)
Smart Saver ® Prescriptive	T-5 4 ft 3 Lamp with Electronic Ballast (replacing T-12 fixture)	per fixture (ballast + bulb)
Smart Saver ® Prescriptive	T-5 4 ft 4 Lamp with Electronic Ballast (replacing T-12 fixture)	per fixture (ballast + bulb)
Smart Saver ® Prescriptive	T-5 High Output 1 Lamp with Electronic Ballast (replacing T-12 fixture)	per fixture (ballast + bulb)
Smart Saver ® Prescriptive	T-5 High Output 2 Lamp with Electronic Ballast (replacing T-12 fixture)	per fixture (ballast + bulb)
Smart Saver ® Prescriptive	T-5 High Output 3 Lamp with Electronic Ballast (replacing T-12 fixture)	per fixture (ballast + bulb)
Smart Saver ® Prescriptive	T-5 High Output 4 Lamp with Electronic Ballast (replacing T-12 fixture)	per fixture (ballast + bulb)
Smart Saver ® Prescriptive	T-8 2ft 1 lamp	per fixture (ballast + bulb)
Smart Saver ® Prescriptive	T-8 2ft 2 lamp	per fixture (ballast + bulb)
Smart Saver ® Prescriptive	T-8 2ft 3 lamp	per fixture (ballast + bulb)
Smart Saver ® Prescriptive	T-8 2ft 4 lamp	per fixture (ballast + bulb)
Smart Saver ® Prescriptive	T-8 3ft 1 lamp	per fixture (ballast + bulb)
Smart Saver ® Prescriptive	T-8 3ft 2 lamp	per fixture (ballast + bulb)
Smart Saver ® Prescriptive	T-8 3ft 3 lamp	per fixture (ballast + bulb)
Smart Saver ® Prescriptive	T-8 3ft 4 lamp	per fixture (ballast + bulb)
Smart Saver ® Prescriptive	T-8 4ft 1 lamp	per fixture (ballast + bulb)
Smart Saver ® Prescriptive	T-8 4ft 2 lamp	per fixture (ballast + bulb)
Smart Saver ® Prescriptive	T-8 4ft 3 lamp	per fixture (ballast + bulb)
Smart Saver ® Prescriptive	T-8 4ft 4 lamp	per fixture (ballast + bulb)

Smart Saver ® Prescriptive	T-8 8ft 1 lamp	per fixture (ballast + bulb)
Smart Saver ® Prescriptive	T-8 8ft 2 lamp	per fixture (ballast + bulb)
Smart Saver ® Prescriptive	T-8 High Output 8 ft 1 Lamp	per fixture (ballast + bulb)
Smart Saver ® Prescriptive	T-8 High Output 8 ft 2 Lamp	per fixture (ballast + bulb)
Smart Saver ® Prescriptive	Thermal Storage	per unit
Smart Saver ® Prescriptive	Vending Equipment Controller	per vending equipment controller
Smart Saver ® Prescriptive	VFD HVAC Fan	per HP
Smart Saver ® Prescriptive	VFD HVAC Pump	per HP
Smart Saver ® Prescriptive	VFD Process Pump 1-50 HP	per HP
Smart Saver ® Prescriptive	VSD Air Compressors	per HP
Smart Saver ® Prescriptive	Water Cooled Chiller Tune Up per ton	per ton
Smart Saver ® Prescriptive	Water-Cooled cent Chiller 150 - 300 ton 0.51 kW_ton with 0.3 kW_ton IPLV per ton	per ton
Smart Saver ® Prescriptive	Water-Cooled cent Chiller 150 - 300 ton 0.51 kW_ton with 0.36 kW_ton IPLV per ton	per ton
Smart Saver ® Prescriptive	Water-Cooled cent Chiller 150 - 300 ton 0.51 kW_ton with 0.39 kW_ton IPLV per ton	per ton
Smart Saver ® Prescriptive	Water-Cooled cent Chiller 150 - 300 ton 0.51 kW_ton with 0.41 kW_ton IPLV per ton	per ton
Smart Saver ® Prescriptive	Water-Cooled cent Chiller 150 - 300 ton 0.51 kW_ton with 0.48 kW_ton IPLV per ton	per ton
Smart Saver ® Prescriptive	Water-Cooled cent Chiller 150 - 300 ton 0.57 kW_ton with 0.34 kW_ton IPLV per ton	per ton
Smart Saver ® Prescriptive	Water-Cooled cent Chiller 150 - 300 ton 0.57 kW_ton with 0.4 kW_ton IPLV per ton	per ton
Smart Saver ® Prescriptive	Water-Cooled cent Chiller 150 - 300 ton 0.57 kW_ton with 0.43 kW_ton IPLV per ton	per ton
Smart Saver ® Prescriptive	Water-Cooled cent Chiller 150 - 300 ton 0.57 kW_ton with 0.46 kW_ton IPLV per ton	per ton
Smart Saver ® Prescriptive	Water-Cooled cent Chiller 150 - 300 ton 0.57 kW_ton with 0.54 kW_ton IPLV per ton	per ton
Smart Saver ® Prescriptive	Water-Cooled cent Chiller 150 - 300 ton 0.63 kW_ton with 0.38 kW_ton IPLV per ton	per ton
Smart Saver ® Prescriptive	Water-Cooled cent Chiller 150 - 300 ton 0.63 kW_ton with 0.45 kW_ton IPLV per ton	per ton
Smart Saver ® Prescriptive	Water-Cooled cent Chiller 150 - 300 ton 0.63 kW_ton with 0.48 kW_ton IPLV per ton	per ton
Smart Saver ® Prescriptive	Water-Cooled cent Chiller 150 - 300 ton 0.63 kW_ton with 0.51 kW_ton IPLV per ton	per ton
Smart Saver ® Prescriptive	Water-Cooled cent Chiller greater than 300 ton 0.46 kW_ton with 0.28 kW_ton IPLV per ton	per ton
Smart Saver ® Prescriptive	Water-Cooled cent Chiller greater than 300 ton 0.46 kW_ton with 0.33 kW_ton IPLV per ton	per ton
Smart Saver ® Prescriptive	Water-Cooled cent Chiller greater than 300 ton 0.46 kW_ton with 0.35 kW_ton IPLV per ton	per ton
Smart Saver ® Prescriptive	Water-Cooled cent Chiller greater than 300 ton 0.46 kW_ton with 0.37 kW_ton IPLV per ton	per ton
Smart Saver ® Prescriptive	Water-Cooled cent Chiller greater than 300 ton 0.46 kW_ton with 0.44 kW_ton IPLV per ton	per ton
Smart Saver ® Prescriptive	Water-Cooled cent Chiller greater than 300 ton 0.52 kW_ton with 0.31 kW_ton IPLV per ton	per ton
Smart Saver ® Prescriptive	Water-Cooled cent Chiller greater than 300 ton 0.52 kW_ton with 0.37 kW_ton IPLV per ton	per ton
Smart Saver ® Prescriptive	Water-Cooled cent Chiller greater than 300 ton 0.52 kW_ton with 0.39 kW_ton IPLV per ton	per ton
Smart Saver ® Prescriptive	Water-Cooled cent Chiller greater than 300 ton 0.52 kW_ton with 0.42 kW_ton IPLV per ton	per ton
Smart Saver ® Prescriptive	Water-Cooled cent Chiller greater than 300 ton 0.52 kW_ton with 0.49 kW_ton IPLV per ton	per ton
Smart Saver ® Prescriptive	Water-Cooled Centrifugal Chiller less than 150 ton 0.56 kW_ton with 0.34 kW_ton IPLV per ton	per ton
Smart Saver ® Prescriptive	Water-Cooled Centrifugal Chiller less than 150 ton 0.56 kW_ton with 0.4 kW_ton IPLV per ton	per ton
Smart Saver ® Prescriptive	Water-Cooled Centrifugal Chiller less than 150 ton 0.56 kW_ton with 0.43 kW_ton IPLV per ton	per ton
Smart Saver ® Prescriptive	Water-Cooled Centrifugal Chiller less than 150 ton 0.56 kW_ton with 0.46 kW_ton IPLV per ton	per ton
Smart Saver ® Prescriptive	Water-Cooled Centrifugal Chiller less than 150 ton 0.56 kW_ton with 0.53 kW_ton IPLV per ton	per ton
Smart Saver ® Prescriptive	Water-Cooled Centrifugal Chiller less than 150 ton 0.63 kW_ton with 0.38 kW_ton IPLV per ton	per ton
Smart Saver ® Prescriptive	Water-Cooled Centrifugal Chiller less than 150 ton 0.63 kW_ton with 0.45 kW_ton IPLV per ton	per ton
Smart Saver ® Prescriptive	Water-Cooled Centrifugal Chiller less than 150 ton 0.63 kW_ton with 0.48 kW_ton IPLV per ton	per ton
Smart Saver ® Prescriptive	Water-Cooled Centrifugal Chiller less than 150 ton 0.63 kW_ton with 0.51 kW_ton IPLV per ton	per ton
Smart Saver ® Prescriptive	Water-Cooled Centrifugal Chiller less than 150 ton 0.63 kW_ton with 0.6 kW_ton IPLV per ton	per ton
Smart Saver ® Prescriptive	Water-Cooled Centrifugal Chiller less than 150 ton 0.7 kW_ton with 0.42 kW_ton IPLV per ton	per ton
Smart Saver ® Prescriptive	Water-Cooled Centrifugal Chiller less than 150 ton 0.7 kW_ton with 0.5 kW_ton IPLV per ton	per ton
Smart Saver ® Prescriptive	Water-Cooled Centrifugal Chiller less than 150 ton 0.7 kW_ton with 0.53 kW_ton IPLV per ton	per ton
Smart Saver ® Prescriptive	Water-Cooled Centrifugal Chiller less than 150 ton 0.7 kW_ton with 0.57 kW_ton IPLV per ton	per ton
Smart Saver ® Prescriptive	Water-cooled screw chiller 150 - 300 ton 0.57 kW_ton with 0.34 kW_ton IPLV per ton	per ton

Smart Saver ® Prescriptive	Water-cooled screw chiller 150 - 300 ton 0.57 kW_ton with 0.37 kW_ton IPLV per ton	per ton
Smart Saver ® Prescriptive	Water-cooled screw chiller 150 - 300 ton 0.57 kW_ton with 0.4 kW_ton IPLV per ton	per ton
Smart Saver ® Prescriptive	Water-cooled screw chiller 150 - 300 ton 0.57 kW_ton with 0.43 kW_ton IPLV per ton	per ton
Smart Saver ® Prescriptive	Water-cooled screw chiller 150 - 300 ton 0.57 kW_ton with 0.45 kW_ton IPLV per ton	per ton
Smart Saver ® Prescriptive	Water-cooled screw chiller 150 - 300 ton 0.57 kW_ton with 0.51 kW_ton IPLV per ton	per ton
Smart Saver ® Prescriptive	Water-cooled screw chiller 150 - 300 ton 0.65 kW_ton with 0.39 kW_ton IPLV per ton	per ton
Smart Saver ® Prescriptive	Water-cooled screw chiller 150 - 300 ton 0.65 kW_ton with 0.42 kW_ton IPLV per ton	per ton
Smart Saver ® Prescriptive	Water-cooled screw chiller 150 - 300 ton 0.65 kW_ton with 0.45 kW_ton IPLV per ton	per ton
Smart Saver ® Prescriptive	Water-cooled screw chiller 150 - 300 ton 0.65 kW_ton with 0.48 kW_ton IPLV per ton	per ton
Smart Saver ® Prescriptive	Water-cooled screw chiller 150 - 300 ton 0.65 kW_ton with 0.51 kW_ton IPLV per ton	per ton
Smart Saver ® Prescriptive	Water-cooled screw chiller 150 - 300 ton 0.65 kW_ton with 0.57 kW_ton IPLV per ton	per ton
Smart Saver ® Prescriptive	Water-cooled screw chiller 150 - 300 ton 0.72 kW_ton with 0.43 kW_ton IPLV per ton	per ton
Smart Saver ® Prescriptive	Water-cooled screw chiller 150 - 300 ton 0.72 kW_ton with 0.47 kW_ton IPLV per ton	per ton
Smart Saver ® Prescriptive	Water-cooled screw chiller 150 - 300 ton 0.72 kW_ton with 0.5 kW_ton IPLV per ton	per ton
Smart Saver ® Prescriptive	Water-cooled screw chiller 150 - 300 ton 0.72 kW_ton with 0.54 kW_ton IPLV per ton	per ton
Smart Saver ® Prescriptive	Water-cooled screw chiller 150 - 300 ton 0.72 kW_ton with 0.57 kW_ton IPLV per ton	per ton
Smart Saver ® Prescriptive	Water-cooled screw chiller greater than 300 ton 0.51 kW_ton with 0.31 kW_ton IPLV per ton	per ton
Smart Saver ® Prescriptive	Water-cooled screw chiller greater than 300 ton 0.51 kW_ton with 0.33 kW_ton IPLV per ton	per ton
Smart Saver ® Prescriptive	Water-cooled screw chiller greater than 300 ton 0.51 kW_ton with 0.36 kW_ton IPLV per ton	per ton
Smart Saver ® Prescriptive	Water-cooled screw chiller greater than 300 ton 0.51 kW_ton with 0.38 kW_ton IPLV per ton	per ton
Smart Saver ® Prescriptive	Water-cooled screw chiller greater than 300 ton 0.51 kW_ton with 0.4 kW_ton IPLV per ton	per ton
Smart Saver ® Prescriptive	Water-cooled screw chiller greater than 300 ton 0.51 kW_ton with 0.46 kW_ton IPLV per ton	per ton
Smart Saver ® Prescriptive	Water-cooled screw chiller greater than 300 ton 0.58 kW_ton with 0.35 kW_ton IPLV per ton	per ton
Smart Saver ® Prescriptive	Water-cooled screw chiller greater than 300 ton 0.58 kW_ton with 0.37 kW_ton IPLV per ton	per ton
Smart Saver ® Prescriptive	Water-cooled screw chiller greater than 300 ton 0.58 kW_ton with 0.4 kW_ton IPLV per ton	per ton
Smart Saver ® Prescriptive	Water-cooled screw chiller greater than 300 ton 0.58 kW_ton with 0.43 kW_ton IPLV per ton	per ton
Smart Saver ® Prescriptive	Water-cooled screw chiller greater than 300 ton 0.58 kW_ton with 0.45 kW_ton IPLV per ton	per ton
Smart Saver ® Prescriptive	Water-cooled screw chiller greater than 300 ton 0.58 kW_ton with 0.51 kW_ton IPLV per ton	per ton
Smart Saver ® Prescriptive	Water-cooled screw chiller greater than 300 ton 0.64 kW_ton with 0.38 kW_ton IPLV per ton	per ton
Smart Saver ® Prescriptive	Water-cooled screw chiller greater than 300 ton 0.64 kW_ton with 0.42 kW_ton IPLV per ton	per ton
Smart Saver ® Prescriptive	Water-cooled screw chiller greater than 300 ton 0.64 kW_ton with 0.45 kW_ton IPLV per ton	per ton
Smart Saver ® Prescriptive	Water-cooled screw chiller greater than 300 ton 0.64 kW_ton with 0.48 kW_ton IPLV per ton	per ton
Smart Saver ® Prescriptive	Water-cooled screw chiller greater than 300 ton 0.64 kW_ton with 0.51 kW_ton IPLV per ton	per ton
Smart Saver ® Prescriptive	Water-cooled screw chiller less than 150 ton 0.63 kW_ton with 0.38 kW_ton IPLV per ton	per ton
Smart Saver ® Prescriptive	Water-cooled screw chiller less than 150 ton 0.63 kW_ton with 0.41 kW_ton IPLV per ton	per ton
Smart Saver ® Prescriptive	Water-cooled screw chiller less than 150 ton 0.63 kW_ton with 0.44 kW_ton IPLV per ton	per ton
Smart Saver ® Prescriptive	Water-cooled screw chiller less than 150 ton 0.63 kW_ton with 0.47 kW_ton IPLV per ton	per ton
Smart Saver ® Prescriptive	Water-cooled screw chiller less than 150 ton 0.63 kW_ton with 0.5 kW_ton IPLV per ton	per ton
Smart Saver ® Prescriptive	Water-cooled screw chiller less than 150 ton 0.63 kW_ton with 0.56 kW_ton IPLV per ton	per ton
Smart Saver ® Prescriptive	Water-cooled screw chiller less than 150 ton 0.71 kW_ton with 0.43 kW_ton IPLV per ton	per ton
Smart Saver ® Prescriptive	Water-cooled screw chiller less than 150 ton 0.71 kW_ton with 0.46 kW_ton IPLV per ton	per ton
Smart Saver ® Prescriptive	Water-cooled screw chiller less than 150 ton 0.71 kW_ton with 0.5 kW_ton IPLV per ton	per ton
Smart Saver ® Prescriptive	Water-cooled screw chiller less than 150 ton 0.71 kW_ton with 0.53 kW_ton IPLV per ton	per ton
Smart Saver ® Prescriptive	Water-cooled screw chiller less than 150 ton 0.71 kW_ton with 0.56 kW_ton IPLV per ton	per ton
Smart Saver ® Prescriptive	Water-cooled screw chiller less than 150 ton 0.71 kW_ton with 0.63 kW_ton IPLV per ton	per ton
Smart Saver ® Prescriptive	Water-cooled screw chiller less than 150 ton 0.79 kW_ton with 0.47 kW_ton IPLV per ton	per ton
Smart Saver ® Prescriptive	Water-cooled screw chiller less than 150 ton 0.79 kW_ton with 0.51 kW_ton IPLV per ton	per ton
Smart Saver ® Prescriptive	Water-cooled screw chiller less than 150 ton 0.79 kW_ton with 0.55 kW_ton IPLV per ton	per ton
Smart Saver ® Prescriptive	Water-cooled screw chiller less than 150 ton 0.79 kW_ton with 0.59 kW_ton IPLV per ton	per ton
Smart Saver ® Prescriptive	Water-cooled screw chiller less than 150 ton 0.79 kW_ton with 0.62 kW_ton IPLV per ton	per ton

Smart Saver ® Prescriptive	Window Film	per sq ft

Source
DSMore Input Template New Measures May 2010 Refrig Recycling KY.xlsm
DSMore Input Template New Measures May 2010 Refrig Recycling KY.xlsm
2008 KY NEED 2008 20081106.pdf; KY NEED Savings 20081031.xl:
2008 KY NEED 2008 20081106.pdf; KY NEED Savings 20081031.xl:
Low Income Neighborhood Program Impact Explanation and Sources[1].docx
18 Kentucky Payment Plus 2005.pdf
Kentucky - Low Income Refrigerator Replacement - Final Process Impact Evaluation Report - NOV
Ohio HECR Final Process and Impact Evaluation Report Sept 2011.pdf
Home Energy House Call Source Documentation.xlsx
06.02.10_FES-L6A Compact Fluorescent Duke.xlsx
FES-L6a CFL and LED Lighting Res Duke 070110.xls
53 2010 Final Report - Duke Energy Smart Saver CFLs - June 29 2010.pdf
Residential Smart Saver Tune and Seal Impacts.xlsx
Residential Smart Saver Tune and Seal Impacts.xlsx
Table1 with single value for allACs HPs and Furnaces - normal replacement.xls
Residential Smart Saver Tune and Seal Impacts.xlsx
Residential Smart Saver Tune and Seal Impacts.xlsx
Residential Smart Saver Tune and Seal Impacts.xlsx
Table1 with single value for allACs HPs and Furnaces - normal replacement.xls
Duke Energy Midwest Measure Database 0117 Non Weather Only.xls
Duke Energy Midwest Measure Database 0117 Non Weather Only.xls
Duke Energy Midwest Measure Database 0117 Non Weather Only.xls
Master Measure Database Duke 070910 rev 083010.xls
Master Measure Database Duke 070910 rev 083010.xls
Master Measure Database Duke 070910 rev 083010.xls
Duke Energy Midwest Measure Database 0117 Non Weather Only.xls
Duke Energy Midwest Measure Database 0117 Non Weather Only.xls
Master Measure Database Duke 070910 rev 083010.xls
Duke Energy Midwest Measure Database 0117 Non Weather Only.xls
Duke Energy Midwest Measure Database 0117 Non Weather Only.xls
Duke Draft Database Master ver5.xls
Duke Draft Database Master ver5.xls
Duke Draft Database Master ver5.xls
Duke Draft Database Master ver5.xls
Duke Draft Database Master ver5.xls
Duke Draft Database Master ver5.xls
DSMore Input Template New Measures May 2010 Chillers - KY.xlsm
DSMore Input Template New Measures May 2010 Chillers - KY.xlsm
DSMore Input Template New Measures May 2010 Chillers - KY.xlsm
DSMore Input Template New Measures May 2010 Chillers - KY.xlsm
DSMore Input Template New Measures May 2010 Chillers - KY.xlsm
Duke Draft Database Master ver5.xls
Duke Draft Database Master ver5.xls
Duke Draft Database Master ver5.xls
Duke Draft Database Master ver5.xls
Duke Draft Database Master ver5.xls
Duke Draft Database Master ver5.xls
Duke Draft Database Master ver5.xls
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Duke Draft Database Master ver5.xls
Master Measure Database Duke 070910 rev 083010.xls
Master Measure Database Duke 070910 rev 083010.xls
Master Measure Database Duke 070910 rev 083010.xls
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Master Measure Database Duke 070910 rev 083010.xls
Master Measure Database Duke 070910 rev 083010.xls
Master Measure Database Duke 070910 rev 083010.xls
Estimated average impact per participant (fixture, building, motor, project, etc.) based on historical information from other jurisdictions. Actual impacts will be determined on a project specific basis.
Master Measure Database Duke 070910 rev 083010.xls
Master Measure Database Duke 070910 rev 083010.xls
Master Measure Database Duke 070910 rev 083010.xls
Master Measure Database Duke 070910 rev 083010.xls
Master Measure Database Duke 070910 rev 083010.xls
Master Measure Database Duke 070910 rev 083010.xls
Master Measure Database Duke 070910 rev 083010.xls
Master Measure Database Duke 070910 rev 083010.xls
DSMore Input Template New Measures May 2010 - KY Food Service.xlsm
DSMore Input Template New Measures May 2010 - KY Food Service.xlsm
DSMore Input Template New Measures May 2010 - KY Food Service.xlsm
DSMore Input Template New Measures May 2010 - KY Food Service.xlsm
DSMore Input Template New Measures May 2010 - KY Food Service.xlsm
DSMore Input Template New Measures May 2010 - KY Food Service.xlsm
DSMore Input Template New Measures May 2010 - KY Food Service.xlsm
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DSMore Input Template New Measures May 2010 - KY Food Service.xlsm
DSMore Input Template New Measures May 2010 - KY Food Service.xlsm
DSMore Input Template New Measures May 2010 - KY Food Service.xlsm
Master Measure Database Duke 070910 rev 083010.xls
Master Measure Database Duke 070910 rev 083010.xls
Master Measure Database Duke 070910 rev 083010.xls
Master Measure Database Duke 070910 rev 083010.xls
Master Measure Database Duke 070910 rev 083010.xls
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Duke Energy Kentucky
Case No. 2012-085
Staff First Set Data Requests
Date Received: April 13, 2012

STAFF-DR-01-026

REQUEST:

Compare, by program, the kWh and Ccf impacts per program participant in this Application versus the kWh and Ccf impacts per program participant used in Case No. 2011-00448,[1] and explain the differences.

RESPONSE:

The following table shows the comparison, by program, between this Application and the impacts used in Case No. 2011-00448:

		Comparison of KWh, Net w/o losses		Comparison of ccf, Net w/o losses	
Notes	Program Names	July 2010 - June 2011	July 2012 - June 2013	July 2010 - June 2011	July 2012 - June 2013
1	Energy Efficiency Education Program for Schools	116	116	4	4
2	Low Income Services	737	869	183	125
3	Residential Energy Assessments	394	394	20	20
4	Residential Smart $aver®	45	48	NA	18
5	Power Manager	NA	0	NA	NA
6	Smart $aver® Prescriptive	212	199	NA	NA
7	Smart $aver® Custom	0	5,417	NA	NA
8	PowerShare®	NA	0	NA	NA
9	Appliance Recycling	NA	0	NA	NA
10	Low Income Neighborhood	NA	882	NA	NA
11	My Home Energy Report	NA	175	NA	NA

Notes:

1 - Previously just the NEED program. Now includes theatrical performance and NEED

2 - Previously Low Income Program

3 - Previously named Home Energy House Call

4 - Previously Residential Smart Saver only included the energy efficient residences measures, however the program did not receive approval in time for the June 2010 - July 2011 filing period. For comparison, the July 2010 - June 2011 also includes participation in Energy Star Products. Currently Residential Smart $aver® includes energy efficient residences and energy efficient products.

5 - Previously and currently Power Manager

6 - Previously listed as C&I Lighting, HVAC, Motors, and Other

7 - Previously only included custom projects conducted by schools

8 - Previously and currently PowerShare®

9 - New for 2012

10 - New for 2012

11 - New for 2012

[1] Case No. 201 1-00448, Duke Energy Kentucky, Inc. (Ky. PSC April 13,2012).

The following are the explanations for difference in per participant impacts:

Low Income Services:
Low Income Refrigerator Replacement was updated in this Application to reflect new EMV received since the last Update filing. Also, Low Income Weatherization from Case No. 2011-00448 was a single measure but in this Application the low income weatherization measure was broken out into three different measures and the sum of the gas savings from these individual measures was lower than the savings from the previous single measure. The gas savings above assume full participation in all weatherization measures.

Residential Smart $aver®:
This Program was updated to include an additional measure (Duct Insulation). Also, the gas impacts were updated to include gas impacts from Duct Insulation and Attic Insulation.

Smart $aver® Prescriptive:
The KWh for the period of July 2010-June 2011 reflects impacts for measures implemented during filing period. The KWh for the July 2012-June 2013 kwh reflects per participant impacts for all measures being offered in new portfolio.

Smart $aver® Custom:
This program had no participation during filing period July 2010-June 2011, however, participation is expected during the July 2012-June 2013 period.

Low Income Neighborhood:
New Program.

My Home Energy Report:
New Program.

PERSON RESPONSIBLE: Thomas J. Wiles

Duke Energy Kentucky
Case No. 2012-085
Staff First Set Data Requests
Date Received: April 13, 2012

STAFF-DR-01-027

REQUEST:

Compare, by program, the projected number of participants in the first year of the proposed DSM portfolio versus the actual number of 2011 participants of the current DSM portfolio.

RESPONSE:

Comparison of Participation			
Notes	Program Names	July 2010 - June 2011*	July 2012 - June 2013**
1	Energy Efficiency Education Program for Schools	155	1,500
2	Low Income Services	310	303
3	Residential Energy Assessments	511	500
4	Residential Smart $aver®	13,712	512,391
5	Power Manager	9,527	9,538
6	Smart $aver® Prescriptive	25,537	29,270
7	Smart $aver® Custom	0	46
8	PowerShare®	12	25
9	Appliance Recycling	NA	0
10	Low Income Neighborhood	NA	600
11	My Home Energy Report	NA	45,593

1 - Previously just the NEED program. Now includes theatrical performance and NEED

2 - Previously Low Income Program

3 - Previously named Home Energy House Call

4 - Previously Residential Smart Saver only included the energy efficient residences measures, however the program did not receive approval in time for the June 2010 - July 2011 filing period. For comparison, the July 2010 - June 2011 also includes participation in Energy Star Products (number of energy efficient bulbs not participants). Currently Residential Smart $aver® includes energy efficient residences and energy efficient products (number of energy efficient bulbs not participants).[1]

5 - Previously and currently Power Manager

6 - Previously listed as C&I Lighting, HVAC, Motors, and Other

[1] The Smart $aver Residential Energy Efficient Products Program and the Energy Efficient Residences Program are individual measures that are part of a single and larger program referred to and marketed as Residential Smart $aver. For ease of administration and communication with customers the two measures have been divided into separate tariffs even though they are a single program.

7 - Previously only included custom projects conducted by schools

8 - Previously and currently PowerShare®

9 - New for 2012

10 - New for 2012

11 - New for 2012

*Participation as stated in Case No. 2011-00448

**Participation as stated in attachments AJO-5 and AJO-6 in Case No. 2012-00085

PERSON RESPONSIBLE: Thomas J. Wiles

Duke Energy Kentucky
Case No. 2012-085
Staff First Set Data Requests
Date Received: April 13, 2012

STAFF-DR-01-028

REQUEST:

With the Commission approval of Case No. 2011-00448,[1] the DSM rates that will become effective will include a large credit over-recovery for electric and gas DSM rates.

a. Provide by electric and gas DSM rider the amount of DSM recovery from July 2011 to March 2012, and the projected amount of recovery by electric and gas DSM rider based on forecasted sales for April 2012 to June 2012. And also, provide the projected electric and gas rider rates.

b. If the Commission issues an Order in this case before July 1, 2012 as requested, and the amount of the over or under-recovery remains the same as filed in Case No. 2011-00448, provide the electric and gas DSM rates, by tariff.

c. If the rates proposed in Case No. 2011-00448 became effective for the months of May and June of 2012 and an Order is issued in this case by July 1, 2012, for each month, May through July, explain how the DSM rates will be calculated.

RESPONSE:

a. Electric DSMR recovery for the months of July 2011 through March 2012:
Residential: $1,732,354.08
Non-Residential Distribution Level Rates: $2,259,259.80
Rate TT: $44,770.81

Gas DSMR recovery for the months of July 2011 through March 2012:
Residential: $765,126.80

Electric DSMR recovery for the month of April 2012:
Residential: 99,350,000 kWh @ $0.001514 per kWh = $150,415.90
Non-Residential Distribution Level Rates: 183,040,560 kWh @ $0.001326 per kWh = $242,711.78
Rate TT: 11,683,440 kWh @ $0.000274 per kWh = $3,201.26

Gas DSMR recovery for the month of April 2012:
Residential: 5,337,370 CCF @ @0.016509 per CCF = $88,114.64

[1] Id.

Electric DSMR recovery for the months of May and June 2012:
Residential: 207,599,000 kWh @ $0.001295 per kWh = $268,840.71
Non-Residential Distribution Level Rates: 391,379,340 kWh @ $0.001060 per kWh = $414,862.10
Rate TT: 24,981,660 kWh @ $0.00043 per kWh = $10,742.11

Gas DSMR recovery for the months of May and June 2012:
Residential: 3,978,640 CCF @ -$0.053372 per CCF = -$212,347.97

b. The following table shows the rates under the scenario where the Commission issues an Order in this case before July 1, 2012 as requested, and the amount of the over or under-recovery remains the same as filed in Case No. 2011-00448:

Rate Schedule Riders	True-Up Amount (A)	Revenue Requirement (B)	Total DSM Revenue Requirements	Estimated Billing Determinants (C)		DSM Cost Recovery Rider (DSMR)	
Electric Rider DSM							
Residential Rate RS	$ (1,281,012)	$ 5,993.148	$ 4,712,136	1,523,382,000	kWh	$ 0.003093	$/kWh
Distribution Level Rates Part A DS, DP, DT, GS-FL, EH & SP	$ (662.467)	$ 1,302,252	$ 639.785	2,325,304,804	kWh	$ 0.000275	$/kWh
Transmission Level Rates & Distribution Level Rates Part B TT	$ 718.627	$ 1,222,233	$ 1.940,860	2,551,577,000	kWh	$ 0.000761	$/kWh
Distribution Level Rates Total DS, DP, DT, GS-FL, EH & SP						$ 0.001036	$/kWh
Gas Rider DSM							
Residential Rate RS	$ (4,419,719)	$ 595,035	$ (3.824,684)	62,299,990	CCF	$ (0.061391)	$/CCF

c. The Company intends to implement the rates approved in Case No. 2011-00448 per the Order dated April 13, 2012 on May 1 as part of May 2012 billing. The DSMR rates approved in the 2011-00448 case will be effective through June 2012. If the Commission issues an Order in this case by July 1, the Company proposes to implement rates as shown above in part (b) to this data request. Subsequently, the Company proposes to make its annual update filing in November 2012.

PERSON RESPONSIBLE: James E. Ziolkowski