

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF DUKE ENERGY KENTUCKY,)	CASE NO.
INC. TO AMEND ITS DEMAND SIDE)	2013-00313
MANAGEMENT PROGRAMS)	

COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
TO DUKE ENERGY KENTUCKY, INC.

Duke Energy Kentucky, Inc. ("Duke Kentucky"), pursuant to 807 KAR 5:001, is to file with the Commission the original and eight copies of the following information, with a copy to all parties of record. The information requested herein is due on or before October 21, 2013. Responses to requests for information shall be appropriately bound, tabbed and indexed. Each response shall include the name of the witness responsible for responding to the questions related to the information provided.

Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Duke Kentucky shall make timely amendment to any prior response if it obtains information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which Duke Kentucky fails or refuses to furnish all or part of the requested information, it shall

provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request.

1. Refer to the response to Commission Staff's First Request for Information (Staff's First Request") to Duke Energy Kentucky, Inc. Item 2, which states, "[t]he total price of the installation can range from around \$1,200 to over \$2,000."

a. Provide the possible price range if a comparable non-Energy Star electric heat pump water heater were to be installed versus an Energy Star electric heat pump water heater.

b. Explain whether the \$300 incentive is the difference in cost between an Energy Star electric heat pump water heater versus a non-Energy Star electric heat pump water heater.

2. Refer to the response to Staff's First Request, Item 3. Explain whether the \$400 incentive is the incremental cost between the purchase and installation of energy efficient equipment controls versus the purchase and installation of comparable non-energy-efficient equipment controls.


3. Refer to the response to Staff's First Request, Item 5. The response states, "Please refer to Conclusions, page 14, item 6, number 4 of the Order in Case No. 2012-00495. Duke Energy Kentucky was ordered to file all program evaluations with the Commission by August of each year. Duke Energy Kentucky will continue to

file evaluations by August of each year until the entire portfolio is evaluated by December 31, 2016.” Refer to page 15, paragraph 3 of the Order in Case No 2012-00495¹ which states, “Duke Kentucky shall evaluate its entire portfolio of DSM programs by December 31, 2016. The exception would be in applications that include a new program or an expansion of an existing program.” Explain whether Duke Kentucky interprets this to mean that the programs in its demand-side management (“DSM”) portfolio are to be evaluated individually by December 31, 2016, in contradiction of ordering paragraph 3 on page 15 which requires all the DSM programs to be evaluated at one time in its August 15, 2016 filing.

4. The Duke Kentucky’s cost of the evaluation reports are listed in the following table. Provide the average cost per participant for each evaluation and explain whether Duke Kentucky believes this is a reasonable cost per participant for the evaluation and for the information received.

<u>Data Request Response Item No</u>	<u>DSM Portfolio Programs</u>	<u>Evaluation Report Cost Total</u>	<u>Duke Energy Kentucky's Portion</u>
4	Energy Education Program for Schools ("NEED")	\$33,557.00	\$33,557.00
10	Energy Star Products ("CFL") Products	\$129,019.80	\$129,019.80
12	Non Residential Smart Saver Prescriptive	\$56,283.14	\$13,974.38
13	Power Manager Program	<u>\$27,698.10</u>	<u>\$6,956.79</u>
	Total	\$246,558.04	\$183,507.97

¹ Case No. 2012-00495, Application of Duke Energy Kentucky, Inc. for the Annual Cost Recovery Filing for Demand Side Management (Ky. PSC Apr. 11, 2013).



Jeff Derouen
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DATED OCT 10 2013

cc: Parties of Record

Case No. 2013-00313

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