

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

SAM OLLIE DROGANES)	
)	
COMPLAINANT)	
)	CASE NO.
V.)	2024-00123
)	
DUKE ENERGY KENTUCKY, INC.)	
)	
DEFENDANT)	

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

Duke Energy Kentucky, Inc. (Duke Kentucky), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due on January 29, 2025. The Commission directs Duke Kentucky to the Commission's July 22, 2021, Order in Case No. 2020-00085¹ regarding filings with the Commission. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the question to which the response is made and 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

¹ Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC July 22, 2021), Order (in which the Commission mandated electronic filing, with exception to *pro se* formal complaints filed against utilities). *Pro se* parties in formal complaint cases may submit responses by U.S. Mail addressed to the Public Service Commission at 211 Sower Boulevard, P.O. Box 615, Frankfort, Kentucky 40602-0615, or by electronic email sent to PSCED@ky.gov. Responses filed using electronic email should include the case number in the subject line of the message and a read receipt to ensure the Commission received the message and documents.

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 Duke Kentucky obtains information that indicates the response was incorrect or incomplete when made or, though correct or complete when made, is now incorrect or incomplete in any material respect.

For any request to which Duke Kentucky fails or refuses to furnish all or part of the requested information, Duke Kentucky shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied and scanned 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. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, Duke Kentucky shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

A copy of this request shall be served on Sam Ollie Droganes (Complainant) by U.S. Postal Service certified mail, return receipt requested, at P.O. Box 703, 207 Pike St. Covington, Kentucky 41011.

1. Provide any and all documentation related to Complainant's application or request for Duke Kentucky to classify service address 207 Pike St. Covington, Kentucky 41011 as a "residence" subject to a residential rate, including, but not limited to, emails, site visit reports, and call recordings.

2. Provide Duke Kentucky's written standard for determining whether a property is residential or commercial in character. If there is a policy related to such a determination, include the written policy in the response.

3. Provide Duke Kentucky's process for reclassifying a property from commercial to residential for rate purposes. If there is a policy related to such an action, include the written policy in the response. Include in the response how the process is initiated.

4. Provide the energy used, per kWh, by the Complainant for each month after the Complainant's request to reclassify the Complainant's property in October 2023.

5. Based on the information provided in response to Item 4 above, calculate the Complainant's bills, for each billing period, based on a residential rate for the entire building from the date the Complainant's request was made until the date of this request. Consider this an ongoing request that should be updated each billing period. In the response, include the actual amount billed to Complainant as compared to the calculated amount as requested.

Linda Bridwell RP

Linda C. Bridwell, PE
Executive Director
Public Service Commission
P.O. Box 615
Frankfort, KY 40602

DATED JAN 17 2025

cc: Parties of Record

Case No. 2024-00123

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