

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF DUKE ENERGY KENTUCKY,)	
INC. FOR APPROVAL OF ENERGY EFFICIENCY)	CASE NO.
PLAN, INCLUDING AN ENERGY EFFICIENCY)	2008-00495
RIDER AND PORTFOLIO OF ENERGY)	
EFFICIENCY PROGRAMS)	

SUPPLEMENTAL DATA REQUEST OF COMMISSION STAFF TO
DUKE ENERGY KENTUCKY

Duke Energy Kentucky ("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 September 18, 2009. 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 should 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. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations.

1. Refer to page 2 of the Direct Testimony of Donald L. Storck (“Storck Testimony”) where it states that he is employed “as a Director, Rates Services.” (Emphasis added).

a. Explain whether Mr. Storck is the only Director, Rates Services, employed by Duke Energy Business Services, Inc. (“Business Services”) or if there are multiple people with that title.

b. If there are other persons employed by Business Services as a Director, Rates Services, provide those individuals’ names and a brief summary of their education and employment histories.

c. If other Rates Services directors are identified in the response to part b. of this request, explain how Mr. Storck was selected as the director to file testimony at this stage of this proceeding and adopt the Direct Testimony of Paul G. Smith filed herein on December 1, 2008.

2. Refer to page 3 of the Storck Testimony which indicates that Mr. Storck has not previously testified before the Kentucky Commission. Identify the commissions before which Mr. Storck has testified and the specific dockets in which he has testified from 2005 to the present.

3. Refer to page 5 of the Storck Testimony, Attachments DLS-1 and DLS-2, regarding the opt-out provision for industrial customers with energy-intensive loads, and KRS 278.285(3) which provides in pertinent part: “[t]he commission shall allow individual industrial customers with energy intensive processes to implement cost-effective energy efficiency measures in lieu of measures approved as part of the utility’s demand-side management programs if the alternative measures by these customers are not subsidized by other customer classes. Such individual industrial customers shall not be assigned the cost of demand-side management programs.”

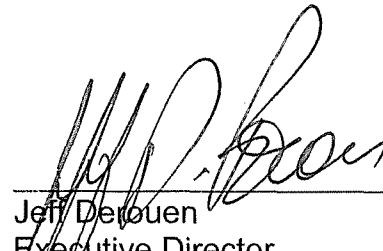
a. Explain how, under Rider SAW, Duke Kentucky intends to verify that customers choosing to opt out have “energy intensive loads.”

b. Explain whether Duke Kentucky is proposing to allow all individual industrial customers with energy intensive processes to opt out or only those that have implemented cost-effective energy efficiency measures.

c. If Duke Kentucky is proposing to allow all individual industrial customers with energy intensive processes to opt out, explain how this is consistent with the statute.

d. If Duke Kentucky is proposing to allow only those individual industrial customers with energy intensive processes that have implemented cost-effective energy efficiency measures to opt out, explain, how Duke Kentucky intends to

verify that customers choosing to opt out have implemented cost-effective energy efficiency measures.



Jeff Derouen
Executive Director
Public Service Commission
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DATED: SEP - 8 2009

cc: Parties of Record

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