

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF DUKE)	
ENERGY KENTUCKY, INC. FOR (1) A)	CASE NO
CERTIFICATE OF PUBLIC CONVENIENCE)	2016-00152
AND NECESSITY AUTHORIZING THE)	
CONSTRUCTION OF AN ADVANCED)	
METERING INFRASTRUCTURE; (2) REQUEST)	
FOR ACCOUNTING TREATMENT; AND (3) ALL)	
OTHER NECESSARY WAIVERS, APPROVALS,)	
AND RELIEF)	

COMMISSION STAFF'S POST-HEARING 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 an original with six copies in paper medium and an electronic version of the following information. The information requested herein is due on or before December 30, 2016. Responses to requests for information in paper medium 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. 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.

1. Provide the cost justification for the opt-out provision for Duke Energy, Inc.'s ("Duke Energy") operating companies in Ohio, North Carolina, and South Carolina for both the one-time fee and monthly fee.

2. Provide all the calculations discussed in Duke Kentucky's response to Staff's Second Request, Item 1.b.(2), that support the amount shown for "Annual costs assoc. with Electric meter failures" that appears on Exhibit DLS-4, page 2 of 13, row 18.

3. Provide the number of digital meters and analog/electro-mechanical meters in service for Duke Kentucky.

4. Provide documentation, after contacting the manufacturer, regarding the estimated useful life of the AMI electric meters Duke Kentucky is proposing to install.

5. Provide the effect it would have on annual expense if the gas modules were depreciated over a 15-year and 18-year life, compared to a nine-year life.

6. Explain if the 396 residential electric meters used for load research are accounted for in Duke Kentucky's mass meter account in such a way as to distinguish them from other meters so they do not become a part of the regulatory asset requested for the amount of undepreciated meters.

7. Refer to PAL-SET-1, page 1 of 2. Provide detailed cost support for the amounts shown on this attachment.

8. Refer to PAL-SET-1, page 1 of 2. Provide the one-time opt-out cost for an electric-only customer.

9. Refer to PAL-SET-1, page 2 of 2. Explain why the labor rates for meter reading differ.

10. Using the data from Exhibit DLS-4, calculate the pro-forma adjustment discussed on pages 4–5 of the Stipulation, assuming 2019 as the test year.

11. Explain if "prudence" is synonymous with "reasonableness" as used on page 4 of the Stipulation.

12. Provide a breakdown of the \$140,000 non-recurring cost for information technology required for the opt-out program.

13. Provide the non-recurring cost incurred for information technology required for the opt-out program for Duke Energy's operating companies in Ohio, North Carolina, and South Carolina.

14. Provide an analysis which shows the amount of the non-fuel-related portion of the Benefit Type Increased Revenue as discussed on page 4 of the Stipulation and its effect on the adjustment to be made in Duke Kentucky's next base electric rate case.



Talina R. Mathews
Executive Director
Public Service Commission
P.O. Box 615
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DATED DEC 13 2016

cc: Parties of Record

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