

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC ANNUAL COST RECOVERY)
FILING FOR DEMAND SIDE MANAGEMENT BY) CASE NO.
DUKE ENERGY KENTUCKY, INC) 2017-00427

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 an original and six copies in paper medium and an electronic version of the following information. The information requested herein is due May 2, 2018. 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 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 amendments 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. When filing a document 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. Refer to the Direct Testimony of Timothy J. Duff (“Duff Testimony”), page 12, lines 10–11. Explain how the targeted customers are identified.
2. Refer to the Duff Testimony, page 17, line 14.
 - a. Provide the demand-side management (“DSM”) programs available to Duke Kentucky’s gas customers.
 - b. Confirm that any costs associated with these programs are not subject to the instant case.
3. Refer to the Duff Testimony, page 19, lines 13–19. Explain in detail any modifications to the existing DSM programs or any new DSM programs Duke Kentucky is considering in an effort to meet the Capacity Performance standard for the 2020–2021 PJM Delivery Year.

4. Refer to the Duff Testimony, page 20, lines 21–23. For the past five years, provide the annual participation level, kW, and kWh savings for each DSM program.

5. Refer to the Duff Testimony, page 23, line 10. Explain why Duke Kentucky views the Utility Cost test (“UTC”) as the optimal test as opposed to the Total Resource Cost (“TRC”) test.

6. Refer to the Duff Testimony, Attachment TJD-1. Provide all supporting calculations for each cost-effective test in Excel Spreadsheet format with all formulas intact and unprotected, and with all columns and rows accessible.

7. Refer to the Direct Testimony of John A. Verderame (“Verderame Testimony”), pages 23–24, Tables 1 and 2.

a. Explain why the demand response (“DR”) decreases by almost 50 percent from the 2018–2019 planning year to the 2019–2020 planning year.

b. Explain why the DR decreases by one-third from the 2019–2020 planning year to the 2020–2021 planning year.

c. Confirm that the listed DR impact is only from Duke Kentucky’s PowerShare and Power Manager DSM programs.

(1) If this cannot be confirmed, provide each DSM program’s impact on the total DR.

(2) If this is confirmed, by program, provide the impact each DSM program has on the value of the capacity resource as calculated by PJM Capacity Markets.

8. Refer to the Verderame Testimony, page 31, lines 18–21. Mr. Verderame emphasizes the importance of the PowerShare and Power Manager DSM programs. Provide the value of each of the other DSM programs to Duke Kentucky’s participation in the PJM.



Gwen R. Pinson
Executive Director
Public Service Commission
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DATED APR 23 2018

cc: Parties of Record

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