

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF DUKE ENERGY )	CASE NO.
KENTUCKY, INC. TO AMEND ITS DEMAND SIDE )	2022-00251
MANAGEMENT PROGRAMS )	

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

Duke Kentucky, Inc. (Duke Kentucky), pursuant to 807 KAR 5:001, is to file with the Commission an electronic version of the following information. The information requested is due on September 23, 2022. The Commission directs Duke Kentucky to the Commission's July 22, 2021, Order in Case No. 2020-00085<sup>1</sup> 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 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

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<sup>1</sup> Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC July 22, 2021), Order (in which the Commission ordered that for case filings made on and after March 16, 2020, filers are NOT required to file the original physical copies of the filings required by 807 KAR 5:001, Section 8).

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 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, 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 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.

1. Refer to the Application, paragraph 14.
  - a. Other than the program not being cost effective, provide support of terminating the pilot program.
  - b. Explain whether Duke Kentucky considered making this a full time program even though it is not cost effective.
2. Refer to the Application, paragraph 14. Provide the Peak Time Rebate (PTR) research proposal from ESource.

3. Refer to the Application, Appendix A. Provide the supporting calculations for the cost effectiveness test results in Excel spreadsheet format with all formulas, columns, and rows unprotected and fully accessible.

4. Refer to the Application, Appendix E, page 4. Provide a sample bill illustrating the bill impact of a peak time rebate.

5. Refer to the Application, Appendix E, page 6. Explain why the first two PTR pilot events in August 2020 produced load impacts 2.7 times higher than that of the subsequent summer and why it is expected that the impacts from the subsequent summer are more representative of typical load impacts.

6. Regarding peak time events,

a. Explain whether Duke Kentucky provided suggested actions to take during peak time events.

b. Provide when and how often Duke Kentucky provide suggested actions to take during peak time events.

c. Explain by what means (email, U.S. mail, texting, etc.) Duke Kentucky provided suggested actions to take during peak time events.

7. Refer to Case No. 2019-00277,<sup>2</sup> the final Order entered on April 27, 2020.

a. On page 14, the Commission notes its agreement with the Attorney General's Witness, Paul J Alvarez's argument that a default application where the rebate opportunity is applied to every customer. Explain whether Duke Kentucky evaluated this

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<sup>2</sup> Case No. 2019-00277, *Electronic Application of Duke Energy Kentucky, Inc. to Amend Its Demand Side Management Programs* (Ky. PSC Apr. 27, 2020).

option and, if so, why Duke Kentucky choose not to propose a default application for the PTR Program.

b. On page 15, the Commission notes that DSM programs are a less costly alternative than either purchasing capacity or installing additional capacity and to keep that mindset in the implementation and evaluation of the PTR Pilot Program. Explain whether Duke Kentucky considered continuing the PTR program, even if not cost effective, to continue education and expanded customer response so that when new plant investment is needed, the investment could be avoided or reduced in size due to the steps taken to grow the PTR program on the demand side.

c. On page 15, the Commission encourages Duke Kentucky to learn from this pilot and modify the program so it may maximize the benefit. Explain whether Duke Kentucky evaluated any modifications to the PTR program and if so, provide these modifications and the reason why Duke Kentucky did not propose them.

8. Refer to the Application, Appendix F, page 7. Duke Kentucky states that “it will consider how PTR and other time-differentiated rates might be elements of a broader effort to effectively shape and reduce peak load.” Describe what alternative Demand Side Management and voluntary time-differentiated optional rate programs the Company is considering for reducing demand on its system.

*Linda C. Bridwell*

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DATED SEP 08 2022

cc: Parties of Record

Case No. 2022-00251

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