

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF DUKE ENERGY)	
KENTUCKY, INC. TO CONTINUE THE)	CASE NO. 2014-00094
HOME ENERGY ASSISTANCE)	
PROGRAM)	

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

Duke Energy Kentucky, Inc. ("Duke"), pursuant to 807 KAR 5:001, are to file with the Commission the original in paper medium and an electronic copy the following information. The information requested herein is due no later than 10 days from the date of this request. Responses to requests for information shall be filed in accordance with the electronic filing procedures set forth in 807 KAR 5:001, Section 8, and shall be appropriately indexed and bookmarked. Each response shall include the name of the witness responsible for responding to 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 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 fails or

refuses to furnish all or part of the requested information, Duke 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 1 of the application. The first paragraph requests that the Commission issue an Order extending the Home Energy Assistance (“HEA”) program for a three-year period ending December 31, 2017. In Case No. 2011-00109,¹ Duke was granted approval to continue the HEA program for a 36-month period, ending September 24, 2014.

a. Confirm that Duke is seeking approval to continue its HEA program until December 31, 2017, rather than for three years

b. If the answer to part a. is affirmative, explain why Duke is requesting a different expiration date.

2. Refer to pages 36 and 37 of Duke’s application in Case No. 2011-00448,² and page 34 of Duke’s application in Case No. 2012-00495.³ In Case No. 2011-00448,

¹ Case No. 2011-00109, *Application of Duke Energy Kentucky, Inc. to Continue and Amend the Home Energy Assistance Program* (Ky. PSC Aug. 18, 2011).

² Case No. 2011-00448, *Application of Duke Energy Kentucky, Inc. for the Annual Cost Recovery Filing for Demand-Side Management* (Ky. PSC Apr. 13, 2012).

³ Case No. 2012-00495, *Application of Duke Energy Kentucky, Inc. for the Annual Cost Recovery Filing for Demand Side Management* (Ky. PSC Apr. 11, 2013).

Duke collected \$249,075 and provided assistance to 1,309 accounts under the HEA program. In Case No. 2012-00495, Duke collected \$249,965 and provided assistance to 969 accounts under the HEA program. Explain what factors lead to the decline in the number of accounts assisted, even though the amounts Duke collected each year were relatively similar.

3. Refer to the table below:

	2011- 00448	2012- 00495	2013- 00395
Amount collected	\$249,075	\$249,966	\$243,402
Amount distributed to accounts	\$226,086	\$203,013	\$228,654
Admin. fees	<u>\$33,913</u>	<u>\$26,480</u>	<u>\$29,824</u>
(Under)/Over collected	<u>(\$10,924)</u>	<u>\$20,473</u>	<u>(\$15,076)</u>

a. Confirm that the information above relating to the HEA program is correct. If the answer is affirmative, please answer parts b. and c. below. If the information is not correct, provide any necessary corrections and explain the discrepancy.

b. In Case Nos. 2011-00448 and 2013-00395,⁴ distributions to accounts and administrative fees exceed the amounts collected by Duke by \$10,924 and \$15,077 respectively.


⁴ Case No. 2013-00395, *Duke Energy Kentucky, Inc.'s Annual Cost Recovery Filing for Demand Side Management* (Ky. PSC Mar. 28, 2014).

(1) Provide the reason(s) for the under-collection for the reporting periods associated with Case Nos. 2011-00448 and 2013-00395.

(2) Provide the source of funds used to cover the under-collection for each reporting period noted above.

c. In Case No 2012-00495, distributions to accounts and administrative fees were \$20,472 less than amounts collected by Duke. Explain the ultimate disposition of the over-collected funds.

4. In Case Nos. 2008-00100⁵ and 2011-00109, Duke committed to contribute \$25,000 in shareholder funding in support of the HEA program through the duration of the three-year program period. State whether Duke would be agreeable to continue this level of shareholder funding commitment as part of its request to continue the HEA program.



Jeff Derouen
Executive Director
Public Service Commission
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DATED APR 15 2014

cc: Parties of Record

⁵ Case No. 2008-00100, *Application of Duke Energy Kentucky, Inc. to Reinstitute a Home Energy Assistance Program* (Ky. PSC Sept. 25, 2008).

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