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VIA HAND DELIVERY

September 14, 2018

Ms. Gwen R. Pinson
Executive Director
Kentucky Public Service Commission
211 Sower Blvd
Frankfort, KY 40601

RECEIVED

SEP 14 2018

PUBLIC SERVICE
COMMISSION

Re: **Case No. 2018-00259**
In the Matter of: David I. Dawley v. Duke Energy Kentucky, Inc.

Dear Ms. Pinson:

Please find enclosed Duke Energy Kentucky, Inc.'s First Set of Responses to Commission's Staff Request for Information. Enclosed are the original and ten (10) copies of the responses

Please date-stamp the extra two copies of this letter and return to me in the enclosed envelope.

Respectfully submitted,

Rocco D'Ascenzo (92796)
Deputy General Counsel
Duke Energy Kentucky, Inc.
139 East Fourth Street, 1313 Main
Cincinnati, Ohio 45202
Phone: (513) 287-4320
Fax: (513) 287-4385
Rocco.D'ascenzo@duke-energy.com
Counsel for Duke Energy Kentucky, Inc.

Enclosures: As stated
cc: All parties of record

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KyPSC Case No. 2018-00259
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DATA REQUEST

WITNESS


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VERIFICATION

STATE OF OHIO)
)
COUNTY OF HAMILTON) **SS:**


The undersigned, Robert E. Ries, Manager Project Construction, being duly sworn, deposes and says that he has personal knowledge of the matters set forth in the foregoing data requests and that the answers contained therein are true and correct to the best of his knowledge, information and belief.



Robert E. Ries, Affiant

Subscribed and sworn to before me by Robert E. Ries on this 10TH day of SEPTEMBER 2018.

ADELE M. FRISCH
Notary Public, State of Ohio
My Commission Expires 01-05-2019



NOTARY PUBLIC

My Commission Expires: 1/5/2019

STAFF-DR-01-001

REQUEST:

Explain whether analog meters are available for Duke Kentucky to install at Mr. Dawley's residence.

RESPONSE:

Analog electric meters are not readily available for installation at Mr. Dawley's residence. Duke Energy Kentucky does not stock analog electric meters in inventory. Although the Company is removing some analog electric meters from service as part of its smart meter deployment approved in Case No. 2016-00152, those analog electric meters are scrapped after removal because they are beyond their useful service life. The Company does not have a process in place, nor has it examined the costs it would incur to refurbish those older analog electric meters that are being removed from service in order to make them suitable for reinstallation, if at all possible, for a customer enrolled in the Advanced Meter Opt-out Rider.

PERSON RESPONSIBLE: Bob Ries

**Duke Energy Kentucky
Case No. 2018-00259
Staff First Set Data Requests
Date Received: September 4, 2018**

STAFF-DR-01-002

REQUEST:

If analog meters are available, explain why an analog meter has not been installed at Mr. Dawley's residence.

RESPONSE:

Please see Duke Energy Kentucky's response to Staff-DR-01-001.

PERSON RESPONSIBLE: Bob Ries

REQUEST:

Explain whether Mr. Dawley's existing meter has radio frequency communication ability and, if so, whether Duke Kentucky disabled the radio frequency communication ability pursuant to Rider AMO. If Duke Kentucky has not disabled the radio frequency communication ability of Mr. Dawley's existing meter, explain why it has not been disabled.

RESPONSE:

Mr. Dawley's existing meter is a non-communicating meter that does not have radio frequency (RF) communication capability. As noted in the Commission's order on September 4, 2018, the current meter installed at Mr. Dawley's residence is "an early generation 'smart meter'" that, until recently, communicated using power line carrier (PLC), rather than using RF. Not only does Mr. Dawley's existing meter not have RF communication capability, but now Mr. Dawley's meter does not communicate remotely at all since the PLC collector device has been removed. His existing meter is *non-communicating* and must be read manually by a meter reader walking by the meter. Again, Mr. Dawley's meter never communicated through RF frequency technology. Moreover, his meter is non-communicating altogether at this point.

In compliance with its AMO Rider, Duke Energy Kentucky did not charge Mr. Dawley the \$100 initial set up fee, since he informed the Company that he wanted to

enroll in the AMO rider before an RF smart meter was installed at his residence. Duke Energy Kentucky has allowed Mr. Dawley to keep his non-communicating early generation PLC smart meter, rather than installing a new smart meter with the RF communication capability disabled, the latter of which is the standard meter for customers enrolled in the AMO Rider.

PERSON RESPONSIBLE: Bob Ries