



139 East Fourth Street
1303-Main
Cincinnati, Ohio 45202
o: 513-287-4320
f: 513-287-4385

Rocco.D'Ascenzo@duke-energy.com
Rocco O. D'Ascenzo
Deputy General Counsel

VIA EMAIL: PSCED@ky.gov

October 29, 2021

Ms. Linda Bridwell
Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
Frankfort, Kentucky 40602-0615

RECEIVED
OCT 29 2021
PUBLIC SERVICE
COMMISSION

Re: **Case No. 2021-00324**
In the Matter of Joseph J. Oka v. Duke Energy Kentucky, Inc.

Dear Ms. Bridwell:

Duke Energy Kentucky, Inc. hereby submits its *Responses to Staff's First Request for Information* to be filed in the above-styled case. I certify that the foregoing non-electronic filing is a true and accurate copy of the document that was transmitted to the Commission and Complainant via email and U.S. Mail, postage, pre-paid on October 29, 2021.

Please do not hesitate to contact me if you have any questions.

Respectfully submitted,

/s/Rocco D'Ascenzo
Rocco D'Ascenzo (92796)
Deputy General Counsel
Duke Energy Kentucky, Inc.
139 East Fourth Street, 1303-Main
Cincinnati, Ohio 45202
Phone: (513) 287-4320
Fax: (513) 287-4385
Email: rocco.d'ascenzo@duke-energy.com

Enclosures: As stated
cc: Parties of Record

VERIFICATION

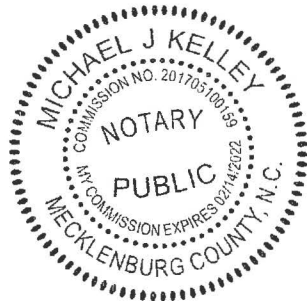
STATE OF NORTH CAROLINA)
) SS:
COUNTY OF MECKLENBURG)

The undersigned, Lesley Quick, VP Strategic Planning, Governace & Technology, being duly sworn, deposes and says that she has personal knowledge of the matters set forth in the foregoing data requests, and that it is true and correct to the best of her knowledge, information, and belief.

Lesley Quick

Lesley Quick Affiant

Subscribed and sworn to before me by Lesley Quick on this 29 day of October, 2021.



Michael J. Kelley

NOTARY PUBLIC

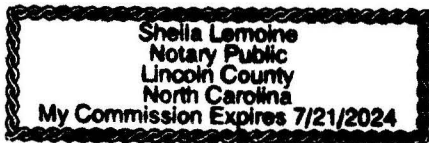
My Commission Expires: 02/14/2022

**G.S. § 10B-41 NOTARIAL CERTIFICATE
FOR ACKNOWLEDGMENT**

Lincoln County, North Carolina

I certify that the following person(s) personally appeared before me this day, each
acknowledging to me that he or she signed the foregoing document: Mary Ann Coleman

Date: October 29, 2021



Sheila Lemoine
Official Signature of Notary

Sheila Lemoine, Notary Public

My commission expires: July 21, 2024

I signed this notarial certificate on October 29, 2021 according to the emergency video notarization requirements contained in G.S. 10B-25.

Notary Public location during video notarization: Lincoln County

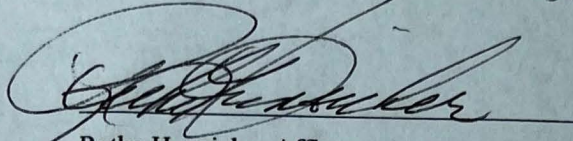
Stated physical location of principal during video notarization: Rowan County

This certificate is attached to a Verification signed by Mary Ann Coleman on October 29, 2021.

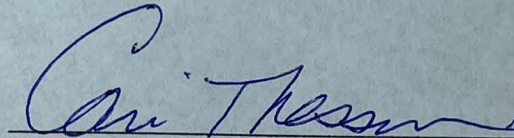
VERIFICATION

STATE OF INDIANA)
) SS:
COUNTY OF MARION)

The undersigned, Retha Hunsicker, VP Customer Connect-Solutions, being duly sworn, deposes and says that she has personal knowledge of the matters set forth in the foregoing data request and that it is true and correct to the best of her knowledge, information and belief.


Retha Hunsicker Affiant

Subscribed and sworn to before me by Retha Hunsicker on this 29 day of Oct, 2021.


NOTARY PUBLIC

CARRI THESSIN
Notary Public, State of Indiana
Seal
County of Marion
Commission No. NP0728993
My Commission Expires 09/24/2028

My Commission Expires: 9/24/2028

VERIFICATION

STATE OF OHIO)

) SS:

COUNTY OF HAMILTON)

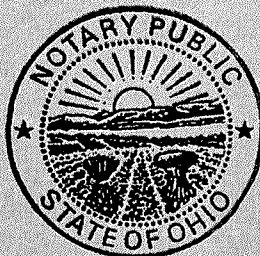
The undersigned, Bruce L. Sailors, Manager Rates & Regulatory Strategy, being duly sworn, deposes and says that he has personal knowledge of the matters set forth in the foregoing data requests and that the answers contained therein are true and correct to the best of his knowledge, information and belief.

Bruce L. Sailors Bruce L. Sailors, Affiant

Subscribed and sworn to before me by Bruce L. Sailors, on this 28th day of October, 2021.

E. Minna Rolfes-Adkins
NOTARY PUBLIC

My Commission Expires: July 8, 2022



E. MINNA ROLFES-ADKINS
Notary Public, State of Ohio
My Commission Expires
July 8, 2022

KyPSC Case No. 2021-00324
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Duke Energy Kentucky
Case No. 2021-00324
STAFF First Set Data Requests
Date Received: October 5, 2021

STAFF-DR-01-001

REQUEST:

Refer to Duke Kentucky's answer (Answer), Exhibit 1, pages 65–68, which contain Duke Kentucky's monthly bills to Joseph J. Oka for usage between June 22, 2021, and July 22, 2021.

- a. State where on the monthly bill Duke Kentucky discloses how it calculated the net metering adjustment of -\$80.49.
- b. If Duke Kentucky does not disclose how the net metering adjustment is calculated on monthly bills, explain why Duke Kentucky does not include this calculation on the monthly bill.
- c. If Duke Kentucky does not disclose how the net metering adjustment is calculated on monthly bills, explain how Duke Kentucky notifies customers how the net metering adjustment is calculated.
- d. Explain whether the Actual reading on July 22, and the Previous reading on June 22 and the Energy used all represent the net amounts after the kWhs generated by the customer have been subtracted. If so, explain how the customer will know the number of kWhs generated in each billing month and the number of kWhs carried forward from the previous month as an offset to current month consumption.
- e. Provide a step-by-step explanation of how the -\$80.49 Net Metering Adjustment was calculated.

- f. Provide a step-by-step explanation of how each of the tax adjustments was calculated.
- g. Explain how each of the specific charges listed in the Billing Details – Electric portion of the bill is affected by the net metering adjustment.

RESPONSE:

- a. Currently the bill is unable to show the calculation for the net metering calculations/adjustments. The bill can show the delivered kWh which is the kWh the customer is charged.
- b. Our current billing system does not have the capability to handle net metering calculations but with our new billing system that is going live in April 2022 the bills will show the calculations.
- c. When we switched the customer's meter from a manually read meter to a digital meter, we sent a letter informing him of the change.
- d. The energy from June to July is used to calculate the credit because the adjustments are based off the delivered and received channels on their meter. Their bill shows the delivered channel's usage which was 875 kWh. As stated above their bill does not show the received kWh - only the amount of the net metering account adjustment.
- e. When the customer's bill we receive their bill holds in order to complete the corrections. Currently, net metering customer bills are calculated manually because the existing billing system cannot accommodate the complex calculation automatically. The new billing system that will go into effect in April 2022 will. Today, a daily report depicts the received kWh for each net metering customer that bills the night before and the Company manually updates each customer's billing

spreadsheet with their received kWh. Once this billing spreadsheet is updated, the Company uses a tool to calculate the credit which includes carryover kWh from previous months. This customer's received kWh was 2209 kWh for the month of July so on the tool and our rate calculation workbook, the Company calculated the credit for the delivered kWh of 875. The customer was credited back excluding their customer charge of \$12.90, and the ESM rider of \$1.19 which every RS customer should pay. The tool looks at what the new bill amount should be and subtracts the amount from their current charges. In this case the calculation was $\$94.55 - \$14.09 = \$80.49$.

- f. The tax adjustments are calculated taking their original tax charges and subtracting them from the new taxes the customer should be charged based off the calculated bill of \$14.09. The franchise fee and school tax are calculated separately.
- g. The objective is to provide the same result as if we billed them for the "net kWh" consumed.

PERSON RESPONSIBLE: Abigail Johnson

Duke Energy Kentucky
Case No. 2021-00324
STAFF First Set Data Requests
Date Received: October 5, 2021

STAFF-DR-01-002

REQUEST:

Explain whether a net metering customer can see the kWhs of energy being consumed and the kWhs generated by the residential solar facility by accessing the customer's account via Duke Kentucky's website.

- a. If the customer can view the amount of energy being consumed and exported on Duke Kentucky's website, state whether the data reflects a real time, hourly, or daily basis.
- b. If the customer can view the amount of energy being consumed and exported on Duke Kentucky's website, describe and provide screen shots of the account information that can be seen or accessed via the website.

RESPONSE:


At this time, a customer can only view the amount of energy being consumed via Duke Energy Kentucky's website. With the future billing system implementation in 2022, customers should be able to view their energy consumed and generated online.

- a. A customer can view the amount of energy being consumed on a daily basis.
- b. Please see STAFF-DR-01-002 Attachment.

PERSON RESPONSIBLE: Lesley G. Quick

Net Metering Acct

Dashboard Page:



My Account MENU ▾


[REDACTED]


Account Summary

Amount due
\$0.00






! IMPORTANT MESSAGE

PAY NOW

 VIEW BILL


 BILLING & PAYMENT HISTORY

Payment Options

 Paperless Billing Manage Settings / Bank Account	 Enrolled MANAGE
 Auto Pay Never miss a payment	 Enrolled MANAGE
 Pay with Credit, Debit Card or eCheck Make an immediate payment online PAY NOW	

[VIEW ALL](#)

Feature



Electric Vehicles >


Check out the benefits of an electric vehicle.

Billing and Payment History Page:


Billing & Payment History

[View Bill Insert](#) [Export Data](#) [Print Page](#)

*Total Dollars Paid may not reflect payments returned by your financial institution



BILL DATE	BILL AMOUNT	DUE DATE	BILLING DAYS	AMOUNT PAID	BILLS
 10/11/2021	\$121.59	11/02/2021	29	\$121.59	VIEW BILL

Payment Activity

PAYMENT DATE	PAYMENT AMOUNT	PAYMENT STATUS 
10/13/2021	\$121.59	APPROVED

Electric Usage

TOTAL KWH 	COST PER DAY KWH	AVG KWH PER DAY
595	\$2.74	21

 09/10/2021	\$157.98	10/04/2021	30	\$157.98	VIEW BILL
 08/12/2021	\$156.04	09/03/2021	31	\$156.04	VIEW BILL

Energy Usage Page:



My Account

MENU

Energy Usage

Account Number
 Name On Account
 Service Address

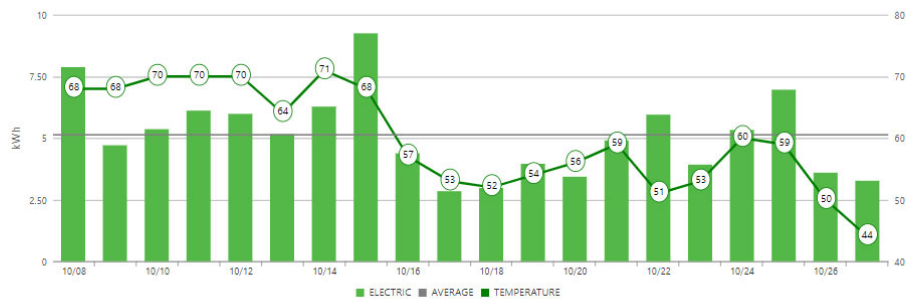


To change Meter, Graph, or Date, make new selections from the options below, please choose a date within the last 24 months.

METER: ELECTRIC - 332571...
 GRAPH: Daily Energy and Avg.
 DATE: 10 / 28 / 2021
 PERIOD: Billing Cycle

[Export Data](#) [Print Page](#)

Daily Energy and Avg. + Billing Cycle



A history of your bills for the selected account is given in the table below.

BILL DATE	BILLING DAYS	READ TYPE	ELECTRICITY USED (KWH)	AVG. KWH/DAY
10/11/2021	29	Actual	166	6
09/10/2021	30	Actual	156	5
08/12/2021	31	Actual	147	5
07/15/2021	30	Actual	164	5
06/11/2021	30	Actual	131	4
05/13/2021	31	Actual	113	4
04/16/2021	30	Actual	9	0

[Terms & Conditions](#)

**Duke Energy Kentucky
Case No. 2021-00324
STAFF First Set Data Requests
Date Received: October 5, 2021**

STAFF-DR-01-003

REQUEST:

Explain whether a net metering customer's meter displays whether the customer is using more energy from the grid than produced.

RESPONSE:

The meter displays two channels; the kWh we deliver to the customer and the kWh we receive from the customer.

PERSON RESPONSIBLE: Mary Ann Coleman

**Duke Energy Kentucky
Case No. 2021-00324
STAFF First Set Data Requests
Date Received: October 5, 2021**

STAFF-DR-01-004

REQUEST:

Refer to Duke Kentucky's Answer, paragraph 2. Provide support for the 3,029 excess kWhs and explain how a customer is able to calculate this excess.

RESPONSE:

The 3,209 kWh excess is from the customer's previous meter, which could move backwards and forwards based off of their generation, that was manually read monthly.

The excess is calculated based off the reads from month to month and taking the difference between the two.

PERSON RESPONSIBLE: Mary Ann Coleman

**Duke Energy Kentucky
Case No. 2021-00324
STAFF First Set Data Requests
Date Received: October 5, 2021**

STAFF-DR-01-005

REQUEST:

Refer to Duke Kentucky's Answer, paragraph 5. Provide the timeline when all three elements of the improved customer experience upgrade will be complete.

RESPONSE:

The final element referenced in the Company's response is the new customer service system, known as Customer Connect. This new system is planned to be fully delivered Spring 2022 for Duke Energy Kentucky.

PERSON RESPONSIBLE: Retha Hunsicker

Duke Energy Kentucky
Case No. 2021-00324
STAFF First Set Data Requests
Date Received: October 5, 2021

STAFF-DR-01-006

REQUEST:

Refer to Duke Kentucky's Answer, paragraph 6, which states that Mr. Oka receives a credit for a uniform gross receipts tax and franchise fees that Mr. Oka would otherwise have been charged.

- a. Explain the basis for Duke Kentucky providing a credit for taxes and franchise fees.
- b. If the referenced credit arises from the net metering adjustment, provide a citation to the section in Duke Kentucky's tariff that sets forth the calculation of the credit for taxes and franchise fees for net metering customers.

RESPONSE:

- a. The basis for Duke Energy Kentucky providing a credit for taxes and franchise fees is that the taxes/fees are based off the original bill amount, but once we calculate and add the credit the bill amount has changed. Therefore, the tax and franchise fees should be changed as well to match the new bill amount.
- b. As referenced in response to STAFF-DR-01-001(g), the objective is to calculate the bill for the net kWh consumed by the customer whether that is 0 kWh or greater. If taxes and franchise fees are not adjusted to reflect what they would be for the net kWh consumed, the bill would not be accurate. Duke Energy Kentucky cites Rider NM, Net Metering Rider, Sheet No. 89 under the Billing section.

BILLING

The measurement of net electricity supplied by the Company and delivered to the Company shall be calculated in the following manner. The Company shall measure the difference between the

amount of electricity delivered by the Company to the Customer and the amount of electricity generated by the Customer and delivered to the Company during the billing period, in accordance with one of the methods listed under "METERING". If the kWh delivered by the Company to the Customer exceeds the kWh delivered by the Customer to the Company during the billing period, the Customer shall be billed for the kWh difference. If the kWh generated by the Customer and delivered to the Company exceeds the kWh supplied by the Company to the Customer during the billing period, the Customer shall be credited in the next billing cycle for the kWh difference. Any unused credit when the Customer closes his account will be granted to the Company.

Bill charges and credits will be in accordance with the same standard tariff that would apply if the Customer were not a customer-generator.

PERSON RESPONSIBLE: Abigail Johnson

**Duke Energy Kentucky
Case No. 2021-00324
STAFF First Set Data Requests
Date Received: October 5, 2021**

STAFF-DR-01-007

REQUEST:

Refer to Duke Kentucky's Tariff, Sixth Revised Sheet No. 89, page 2 of 9. If Duke Kentucky calculates net metering billing as the difference between the amount of energy consumed and the total energy exported by eligible customer-generators over the billing period, explain how the uniform gross receipts tax and franchise fees are implicated by this calculation.

RESPONSE:

The franchise fees are implicated by these calculations because the bill is currently calculated for the energy consumed and then a credit is calculated for the appropriate amount of energy exported. Franchise fees are calculated as 3% of the electric bill when the bill is calculated for the energy consumed. Therefore, to arrive at the correct bill amount based on the net energy consumed, the credit calculated for the appropriate amount of energy exported must also include a credit for the franchise fee.

PERSON RESPONSIBLE: Abigail Johnson

**Duke Energy Kentucky
Case No. 2021-00324
STAFF First Set Data Requests
Date Received: October 5, 2021**

STAFF-DR-01-008

REQUEST:

Confirm that Duke Kentucky nets the energy charge and any riders that are based on a per kWh charge against energy exported, pursuant to KRS 278.465(6). If this cannot be confirmed, explain in specific detail Duke Kentucky's methodology for net metering billing.

RESPONSE:

Confirmed. Duke Energy Kentucky calculates the net metering bill to reflect the net energy consumed by the customer during the billing period whether that be 0 kWh or greater; also accounting for any banked kWh from prior billing periods.

PERSON RESPONSIBLE: Bruce L. Sailors