

**Goss
Samford**

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MAY 10 2022

PUBLIC SERVICE
COMMISSION

David S. Samford
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May 10, 2022

VIA EMAIL & U.S. MAIL

Hon. Linda Bridwell, P.E.
Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
Frankfort, KY 40601

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

Dear Ms. Bridwell:

Attached, please find Duke Energy Kentucky, Inc.'s Status Update to be filed in the above-styled case. This will also 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 May 10, 2022. Please acknowledge receipt of this filing.

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

Sincerely,



David S. Samford

Enc.

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF:

JOSEPH J. OKA	COMPLAINANT)	
)	
V.)	CASE NO.
)	2021-00324
DUKE ENERGY)	
KENTUCKY, INC.	DEFENDANT)	

DUKE ENERGY KENTUCKY, INC.'S
STATUS UPDATE

Comes now Duke Energy Kentucky, Inc. (Duke Energy Kentucky or Company), by counsel, and does hereby tender an update on the status of the upgrade of its Customer Connect system and a brief response to the public comments of the Kentucky Solar Energy Industries Association (KYSEIA), respectfully stating as follows:

Mr. Oka tendered his Complaint to the Kentucky Public Service Commission (Commission) on August 11, 2021. The Complaint broadly alleged that: (1) Mr. Oka was not receiving the proper energy credit on his monthly bills for electricity generated by his net metering solar panels; (2) the Company's AMI meters were yielding incorrect billing data compared to his prior bi-directional meter; (3) the allegedly improper energy credit benefitted Duke Energy Kentucky; (4) the Company was improperly giving a dollar credit rather than a kilowatt credit; (5) using a dollar-denominated credit was a subversion of the rate making process; (6) installation of the new meter did not lead to identifying production values or accumulating kWh credits on the monthly bill; (7) Duke Energy Kentucky did not correctly credit his account with accumulated

kWhs; (8) the Company undervalued the excess energy he produces; and (9) the Company did not timely respond to his calls.

Duke Energy Kentucky tendered its Answer on August 30, 2021 and pointed out that, pursuant to the Commission's Order in Case No. 2016-00152,¹ it began installing AMI meters across its service territory and that Mr. Oka received a new AMI meter on April 9, 2020.² Mr. Oka's account had 3,029 excess kWhs at that point in time, which were transferred to his new account.³ The Company also explained that it received permission in Case No. 2019-00271 to update the bill format to include additional information concerning, among other things, energy consumption and production habits and histories.⁴ The Order in Case No. 2019-00271 noted that Duke Energy Kentucky was in the midst of an enterprise-wide upgrade of its Customer Connect system and that this upgrade would continue throughout 2022.⁵ The Company's Answer acknowledged Mr. Oka's frustration with the limitations of the legacy billing system, but expressed the belief that once the three important changes – AMI meter installation, expanded bill format and upgraded Customer Connect system – were complete, his concerns should be satisfied.⁶ Duke Energy Kentucky also demonstrated that Mr. Oka's monthly electric charges had fallen from

¹ See *In the Matter of the Application of Duke Energy Kentucky, Inc. for (1) A Certificate of Public Convenience and Necessity Authorizing the Construction of an Advance Metering Infrastructure; (2) Request for Accounting Treatment; and (3) All Other Necessary Waivers, Approvals and Relief*, Order, Case No. 2016-00152 (Ky. P.S.C. May 25, 2017).

² See Answer, ¶ 2.

³ See *id.*

⁴ See *id.*, ¶ 3. See also *See In the Matter of the Electronic Application of Duke Energy Kentucky, Inc. for 1) An Adjustment of the Electric Rates; 2) Approval of New Tariffs; 3) Approval of Accounting Practices to Establish Regulatory Assets and Liabilities; and 4) All Other Required Approvals and Relief*, Order, Case No. 2019-00271, p. 54 (Ky. P.S.C. Apr. 27, 2020).

⁵ See *id.*, ¶ 4.

⁶ See *id.*, ¶ 5.

in excess of \$250 per month prior to when his net metering system was installed, to a range of \$13.08 to \$14.37 per month thereafter.⁷

In subsequent discovery, Duke Energy Kentucky explained that under the legacy billing system, it did not have the ability to demonstrate net metering calculations.⁸ In months where Mr. Oka has generated more electricity than he consumed, or the consumption is offset by accumulated kWh credits, his electric bill is limited to the customer charge and the environmental surcharge.⁹ Taxes, including franchise fees and school taxes, are calculated separately and appropriately adjusted based upon the net consumption.¹⁰ Duke Energy Kentucky further explained that until the new Customer Connect billing system was fully implemented, it would not be possible for any net metering customer to view the amount of customer generated energy.¹¹ Nevertheless, Duke Energy affirmed that it nets the energy charge and any riders that are based on a per kWh charge against energy exported, pursuant to KRS 278.465(6).¹²

As anticipated, Duke Energy Kentucky rolled-out the latest update to the Customer Connect billing system in early April. Mr. Oka's first bill under the system was rendered on April 29, 2022. The "Your Usage Snapshot" section of the bill shows both his "energy used" and "energy delivered" in a kWh context.¹³ The "Billing Details – Electric" section further identifies by each applicable element of Duke Energy Kentucky's tariffs how the total current charge for electric service is calculated. The final adjustments related to the franchise fee and taxes are

⁷ See *id.*, ¶ 7, Table 1.

⁸ See Duke Energy Kentucky Response to Staff's First Information Request, Item 1.b. (Oct. 29, 2021).

⁹ See *id.*, Item 1.e.

¹⁰ See *id.*, Items 6. and 7.

¹¹ See *id.*, Item 2.

¹² See *id.*, Item 8.

¹³ A copy of Mr. Oka's April 29, 2022 bill is attached hereto as Exhibit 1. Consistent with the Commission's April 8, 2022 Order denying a prior motion for confidential treatment filed by Duke Energy Kentucky, only Mr. Oka's account number is redacted.

itemized in the “Billing Details – Taxes” section of the bill. Each of the alleged defects in bills for net metering customers rendered by the legacy billing system have been addressed in this new bill format, which is now supported both by Mr. Oka’s AMI meter and the upgraded Customer Connect system. The invoice also demonstrates that Mr. Oka’s total charges for electric service are consistent with the prior bills and calculations previously filed into the record of this docket.

Moreover, the Duke Energy Kentucky website includes a feature whereby Mr. Oka can view both his energy consumption and energy production data.¹⁴ This comprehensive view of a residential net metering customer’s energy habits satisfies each of the asserted deficiencies in the Company’s legacy billing system and customer interface. In other words, the new Customer Connect system and updated website functionality should provide Mr. Oka with the information necessary to fully understand his energy production and consumption history. Given the amount of evidence already in the record concerning the calculation of his prior bills – for which no actual error has yet been identified by Mr. Oka – the Complaint appears to be fully satisfied.

Duke Energy Kentucky makes further reference to the public comments filed by KYSEIA on or about March 17, 2022. The Company notes that KYSEIA’s comments generally and uncharacteristically contain a significant degree of hyperbole and generalization that fails to accurately describe the dispute *sub judice*. As such, the comments should be appropriately discounted, even as non-evidentiary public comments. Nevertheless, Duke Energy Kentucky desires to remind all interested parties that it has been very candid and transparent in describing the challenges associated with its thirty year-old legacy billing system. The Company appreciates the Commission’s long-term support for improving and modernizing its systems. As demonstrated above, Duke Energy Kentucky has been diligent in working to improve customer experiences for

¹⁴ A screenshot of Duke Energy Kentucky’s website that demonstrates this functionality is attached hereto as Exhibit 2.

all customers – including net metering customers – and the fruits of those efforts are now becoming more and more apparent.

Contrary to the public comment’s assertion, Duke Energy Kentucky has not attempted to “shift blame” to anyone. And unlike an advocacy organization, Duke Energy Kentucky must carefully balance the incremental costs of programs serving a small number of customers against the total costs such programs would impose upon all customers. KYSEIA’s comments fully demonstrate an age-old problem of utility rates: customers with specialized services often want all customers to share the costs of those services rather than to bear them themselves. Finally, the Company is compelled to point out that Exhibit 1 to KYSEIA’s comments is misleading. The proffered exhibit is a cached screenshot of an old and obsolete Duke Energy Kentucky url address that is available through a Google search, but it is not a page that appears on the Company’s current website. Upon seeing KYSEIA’s comments, Duke Energy Kentucky verified that its website has consistently contained accurate information regarding net metering. Had KYSEIA sought to access the Duke Energy Kentucky website, it would have discovered that its “gotcha” claim was unfounded. The greatest irony of KYSEIA’s comments is that rather than approach Duke Energy Kentucky directly with its concerns, which would have been more productive, it instead chose to file jaundiced public comments in an apparent effort to create controversy where none reasonably exists.

This 10th day of May 2022.

Respectfully submitted,

Rocco O. D'Ascenzo
Deputy General Counsel
139 East Fourth Street
Cincinnati, OH 45202
(513) 287-4320
rocco.d'ascenzo@duke-energy.com

and

A handwritten signature in black ink, appearing to read "D. Samford", written over a horizontal line.

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L. Allyson Honaker
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Counsel for Duke Energy Kentucky, Inc.

CERTIFICATE OF SERVICE

This is to certify that the foregoing filing is a true and accurate copy of the document being filed; that the filing was transmitted to the Commission (PSCED@ky.gov) and the Complainant [REDACTED] on May 10, 2022 and that the original was mailed to the Commission, with a copy mailed to the Complainant, by placing same into the custody and care of the U.S. Postal Service, postage prepaid, also on May 10, 2022, pursuant to the Commission's August 20, 2021 Order, addressed as follows:

Ms. Linda Bridwell, P.E.
Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
Frankfort, KY 40601

Mr. Joseph J. Oka
42 Ross Avenue
Ft. Mitchell, KY 41017


Counsel for Duke Energy Kentucky, Inc.

EXHIBIT 1

April 22, 2022 Bill



duke-energy.com
800.544.6900

Your Energy Bill

Service address
JOSEPH J OKA
42 ROSS AVE
FORT MITCHELL KY 41017

Bill date Apr 29, 2022
For service Mar 21 - Apr 21
32 days

Account number [REDACTED]

Billing summary

Previous Amount Due	\$34.15
Payment Received Apr 14	-34.15
Current Electric Charges	14.07
Current Gas Charges	24.88
Taxes	2.38
Total Amount Due May 20	\$41.33

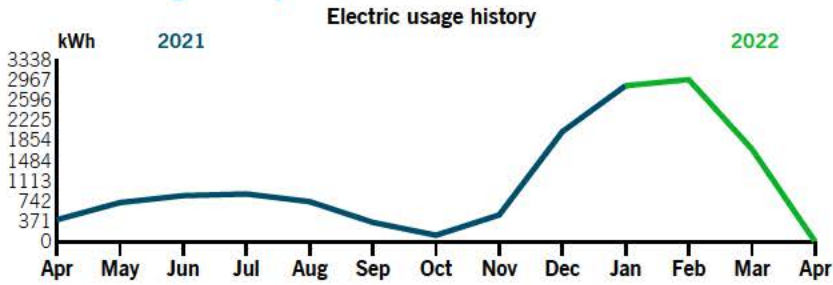


Thank you for your payment.

We've made updates to your bill! Your usage snapshot now includes the average outdoor temperature, and a new account number also displays at the top of your statement. If paying electronically, we encourage you to use this new 12-digit number, although payments can be processed under the old account number, too. Visit duke-energy.com/BillUpdates to learn more.

Know what's below. Call before you dig. Always call 811 before you dig, it's the law. Making this free call at least two full working days before you dig gets utility lines marked and helps protect you from injury and expense. Call 811 or visit Kentucky811.org.

Your usage snapshot



Average temperature in degrees

54° 61° 73° 75° 76° 69° 62° 42° 44° 29° 34° 47° 49°

	Current Month	Apr 2021	12-Month Usage	Avg Monthly Usage
Electric (kWh)	0	403	13,672	1,139
12-month usage based on most recent history				

Late payments are subject to a 0.0% late charge.

Amount of automatic draft

\$41.33
by May 20

Your payment is scheduled to be made by monthly automatic draft on May 20

Account number [REDACTED]

Please return this portion with your payment. Thank you for your business.



Duke Energy Return Mail
PO Box 1090
Charlotte, NC 28201-1090

JOSEPH J OKA
42 ROSS AVE
FT MITCHELL KY 41017-2939

\$ _____ \$ _____
Add here, to help others with a contribution to Share the Light **Amount enclosed**

Duke Energy Payment Processing
PO Box 1094
Charlotte, NC 28201-1094

8891010210170000033000000000000000000000413300000041332



We're here for you

Report an emergency

Electric/Gas outage		duke-energy.com/outages
	Electric	800.543.5599
	Gas	800.634.4300

Convenient ways to pay your bill

Online	duke-energy.com/billing
Automatically from your bank account	duke-energy.com/autodraft
Speedpay (fee applies)	duke-energy.com/pay-now 800.544.6900
By mail payable to Duke Energy	P.O. Box 1094 Charlotte, NC 28201-1094
In person	duke-energy.com/location

Help managing your account (not applicable for all customers)

Register for free paperless billing	duke-energy.com/paperless
Home	duke-energy.com/manage-home
Business	duke-energy.com/manage-bus

Correspond with Duke Energy (not for payment)

P.O. Box 1326
Charlotte, NC 28201

General questions or concerns

Online	duke-energy.com
Home: Mon - Fri (7 a.m. to 7 p.m.)	800.544.6900
Business: Mon - Fri (7 a.m. to 6 p.m.)	800.774.1202
For hearing impaired TDD/TTY	800.222.3448 or 711
International	1.407.629.1010

Request the condensed or detailed bill format

Call (7a.m. to 7 p.m.)	800.544.6900
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Important to know

Your next meter reading: May 19

Please be sure we can safely access your meter for actual readings. Don't worry if your digital meter flashes eights from time to time. That's a normal part of the energy measuring process.

Your service(s) may be disconnected if your payment is past due

If payment for your service(s) is past due, we may begin disconnection procedures. If your service is disconnected because of a missed payment, you must pay the amount specified in the **Important Disconnect Information** section on your bill, as well as, a reconnection fee, before your service will be reconnected. The reconnection fee is \$5.88 for electric service that may be reconnected remotely, \$60 for electric service that is not eligible to be reconnected remotely, \$125 for electric service that was disconnected at the pole and \$90 for gas service. There is an additional fee of \$40 to reconnect electric service after normal business hours if not eligible to be reconnected remotely. A security deposit may also be required.

Electric service does not depend on payment for other products or services

Non-payment for non-regulated products or services (such as surge protection or equipment service contracts) may result in removal from the program but will not result in disconnection of electric service.

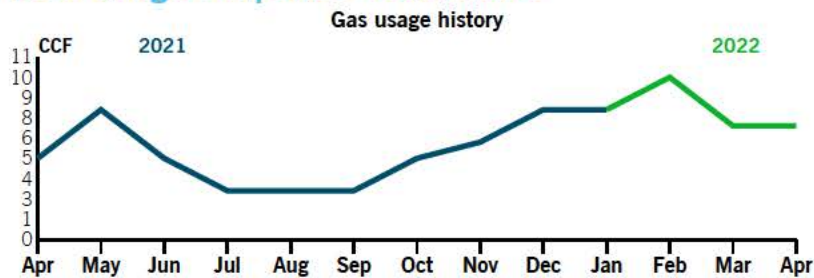
When you pay by check

We may process the payment as a regular check or convert it into a one-time electronic check payment.

Para nuestros clientes que hablan Español

Representantes bilingües están disponibles para asistirle de lunes a viernes de 7 a.m. - 7 p.m. Para obtener más información o reportar problemas con su servicio eléctrico, favor de llamar al 800.544.6900.

Your usage snapshot - Continued



Average temperature in degrees

54° 61° 73° 75° 76° 69° 62° 42° 44° 29° 34° 47° 49°

	Current Month	Apr 2021	12-Month Usage	Avg Monthly Usage
Gas (CCF)	7	5	73	6

12-month usage based on most recent history

Net Metering summary

Previous Carried Forward Balance	7,027
Current Carried Forward	188
Carried Forward Balance	7,215 kWh

Current electric usage for meter number 337388417

Actual reading on Apr 21 15678
Previous reading on Mar 21 - 14075

Energy Used 1,603 kWh

Energy Delivered

Actual reading on Apr 21 19863
Previous reading on Mar 21 - 18072

Energy delivered to grid 1791 kWh

Billed kWh 0.000 kWh



A kilowatt-hour (kWh) is a measure of the energy used by a 1,000-watt appliance in one hour. A 10-watt LED lightbulb would take 100 hours to use 1 kWh.

Current Gas usage for meter number 1120452

Actual reading on Apr 21 298
Previous reading on Mar 21 - 291

Gas Used 7 CCF

Billed CCF 7.000 CCF



One centum cubic foot (CCF) is the amount of gas in a 100-cubic-foot space. If you have a standard oven, it would take about 20 hours to use 1 CCF of gas.

Billing details - Electric

Billing Period - Mar 21 to Apr 21	
Meter - 337388417	
Customer Charge	\$12.90
Environmental Surcharge Mechanism Rider (ESM)	1.17
Total Current Charges	\$14.07

Your current rate is Residential Service (RS).

For a complete listing of all Kentucky rates and riders, visit duke-energy.com/rates



Billing details - Gas

Billing Period - Mar 21 to Apr 21	
Meter - 1120452	
Customer Charge	\$17.80
Gas Delivery Charge	
7.000 CCF @ \$0.52474000	3.67
Gas DSM Rider	
7.000 CCF @ \$0.01480300	0.10
Gas Cost Recovery	
7.000 CCF @ \$0.60340000	4.22
Gas WNA Rider	
7.000 CCF @ \$-0.12976320	-0.91
Total Current Charges	\$24.88

Your current rate is Residential Service (RS).

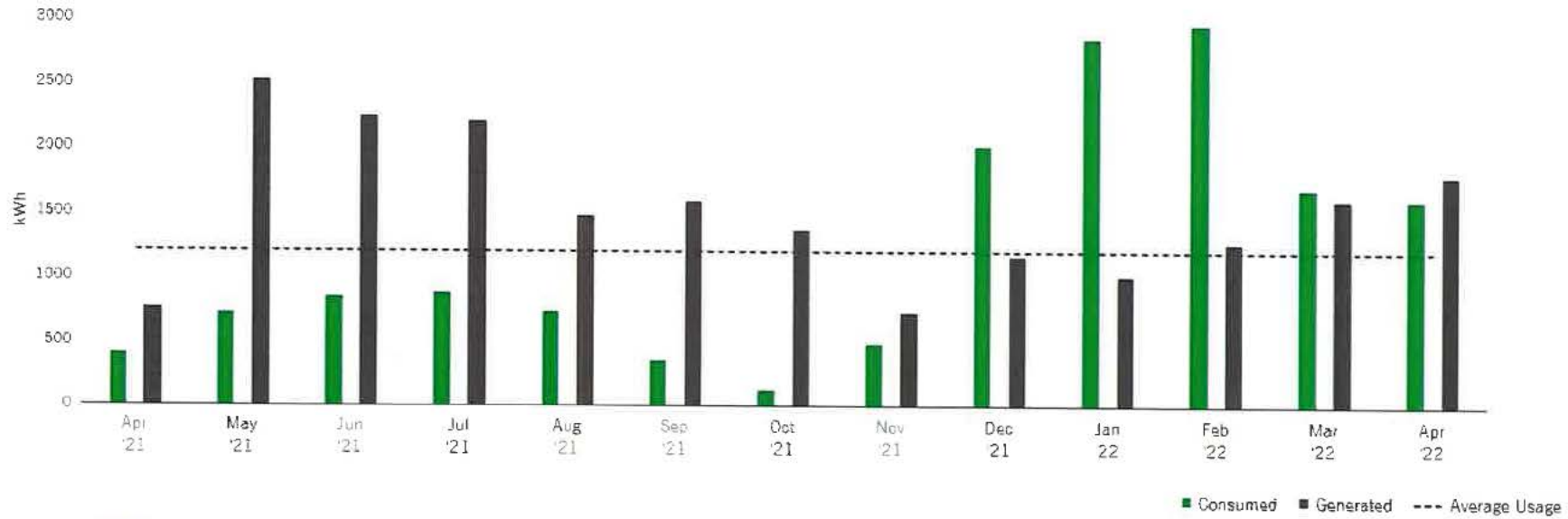
Billing details - Taxes

Franchise Fee	\$1.17
Rate Increase For School Tax	1.21
Total Taxes	\$2.38

EXHIBIT 2

Screenshot of Website

Year Selection
 Apr. 2021 - Apr. 2022



Net Metering
 Compare to previous year

Usage figures are estimates only; actual figures will vary. Bill impacts figures, where provided, are approximate and may differ from actual impacts. You are responsible for your own analysis and purchasing decisions. This page is designed to help you acquire the information you need to help you make your own decisions. You, however, must make those decisions. You are responsible for properly analyzing and verifying any information you intend to rely upon.