

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELIZABETH L. EICHELBERGER)	
)	
COMPLAINANT)	
)	CASE NO.
V.)	2022-00289
)	
DUKE ENERGY KENTUCKY, INC.)	
)	
DEFENDANT)	

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

Duke Energy Kentucky, Inc. (Duke Kentucky), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due on November 17, 2023. The Commission directs Duke Kentucky to the Commission's July 22, 2021 Order in Case No. 2020-00085¹ 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

¹ 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).

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 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 or incomplete when made or, though correct or complete when made, is now incorrect or incomplete 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 and scanned 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. Provide Ms. Eichelberger's bills from August 2023 to present.
2. Refer to Duke Kentucky's response to Commission Staff's First Request for Information, Item 3(b).

a. Provide any authority permitting use of a three-month average in calculating budget billing instead of a 12-month average for gas and electric budget billing.

b. Provide any authority permitting use of average billings instead of average usage at present rates.

3. Refer to Duke Kentucky's electric tariff² and Duke Kentucky's response to Commission Staff's Third Request for Information (Staff's Third Request), Item 4.

a. Identify all budget billing adjustments made to Ms. Eichelberger's account for electric service and provide any written request by Ms. Eichelberger to change budget billings or any documentation of phone calls in which she requested to change budget billings.

b. Provide separate calculations for gas and electric budget billing quarterly changes identified in Duke Kentucky's response to Staff's Third Request, Item 4(a).

c. If Duke Kentucky's response to request 4(b) above includes changes to electric budget billing, provide any authority permitting Duke Kentucky to change electric budget billing amounts quarterly.

4. Refer to the Appendix to this request for information, which, using information from Ms. Eichelberger's Duke Kentucky bills calculates her expected budget billing balance and compares it to the budget billing balance listed on the bill itself. Beginning with the March 19, 2022, explain whether Commission Staff's calculations are

² KY.P.S.C. Electric No. 2, Sixth Revised Sheet No. 25 (issued Mar. 18, 2022), page 3, effective April 18, 2022.

correct. If so, explain why the amounts on Ms. Eichelberger's actual bills are incorrect.
If not, explain why and how Commission Staff's calculations are incorrect.



Linda C. Bridwell, PE
Executive Director
Public Service Commission
P.O. Box 615
Frankfort, KY 40602

DATED OCT 30 2023

cc: Parties of Record

Case No. 2022-00289

APPENDIX

APPENDIX TO A REQUEST FOR INFORMATION OF THE KENTUCKY
PUBLIC SERVICE COMMISSION IN CASE NO. 2022-00289 DATED OCT 30 2023

Duke Energy Kentucky
Commission Staff's Calculation of Ms. Eichelberger's Budget Billing Balance

Bill Date	Gas Charges	Electric Charges	Taxes	Late Payment Charges	Total Charges	Payment	Staff Calculated Budget Billing Balance	Budget Billing Balance On Bill	Difference
2/28/2022							637.34	637.34	-
3/19/2022	34.85	204.87	15.59		255.31	(350.00)	542.65	892.65	350.00
5/5/2022	20.93	229.79	16.30		267.02	-	809.67	493.67	(316.00)
5/19/2022	17.80	113.94	8.57		140.31	(809.67)	140.31	300.98	160.67
6/21/2022	17.80	149.49	10.88		178.17	-	318.48	146.15	(172.33)
7/21/2022	17.80	157.00	11.37		186.17	(172.33)	332.32	(0.68)	(333.00)
8/22/2022	17.80	141.51	10.36		169.67	(333.00)	168.99	(164.01)	(333.00)
9/21/2022	17.80	108.78	8.23		134.81	(333.00)	(29.20)	(362.20)	(333.00)
10/22/2022	17.80	143.80	10.51	16.65	188.76	-	159.56	(402.09)	(561.65)
11/18/2022	19.51	192.45	13.78		225.74	(561.65)	(176.35)	(388.35)	(212.00)
12/20/2022	32.94	384.27	27.13		444.34	(212.00)	55.99	(156.01)	(212.00)
1/20/2023	74.10	370.01	28.88		472.99	(55.99)	472.99	(204.99)	(677.98)
2/20/2023	47.67	258.48	19.91		326.06	(268.00)	531.05	263.05	(268.00)
3/21/2023	24.89	174.31	12.95		212.15	(268.00)	475.20	207.20	(268.00)
4/20/2023	22.27	140.62	10.59		173.48	(268.00)	380.68	89.68	(291.00)
5/19/2023	17.80	88.43	6.91		113.14	(291.00)	202.82	(88.18)	(291.00)
6/21/2023	17.38	98.28	7.52		123.18	(291.00)	35.00	(256.00)	(291.00)
7/24/2023	18.95	98.01	7.60	2.15	126.71	(248.00)	(86.29)	(379.44)	(293.15)

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