

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

JEANE COLE)	
)	
COMPLAINANT)	
)	CASE NO.
V.)	2022-00435
)	
DUKE ENERGY KENTUCKY, INC.)	
)	
DEFENDANT)	

COMMISSION STAFF'S FIRST 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 within 20 days of service of this Request for Information. 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

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 mandated electronic filing, with exception to *pro se* formal complaints filed against utilities). *Pro se* parties in formal complaint cases may submit responses by U.S. Mail addressed to the Public Service Commission at 211 Sower Boulevard, P.O. Box 615, Frankfort, Kentucky 40602-0615, or by electronic email sent to PSCED@ky.gov. Responses filed using electronic email should include the case number in the subject line of the message and a read receipt to ensure the Commission received the message and documents.

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 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.

A copy of this request shall be served on the Complainant, Jeane Cole, by U.S. certified mail, return receipt requested at 319 Ervin Terrace, Dayton, Kentucky 41074.

1. State the date that Duke Kentucky noticed the natural gas meter readings were not being communicated remotely for meter 1183200.
2. Explain the reason(s) that meter 1183200 was not communicating remotely and how that was determined.
3. State the specific steps that Duke Kentucky took when it first noticed that meter 1183200 was not communicating remotely.
4. Provide an hourly breakdown in gas usage for the months from March 2022 through August 2022.
5. Explain whether the meter interface unit (MIU) for meter 1183200 malfunctioned.
6. Explain whether a malfunctioning MIU can cause a false reading.
7. Explain in detail Duke Kentucky's process for when an MIU fails to read, including what specifically the meter reader does when an MIU fails.
8. Explain whether Duke Kentucky followed its own internal policies and procedures after learning that the MIU had malfunctioned and provide a copy of Duke Kentucky's policies and procedures for when an MIU malfunctions.
9. Explain whether Duke Kentucky made a visual reading off of the register when the MIU first failed. If so, provide the register reading(s). If not, explain what prevented Duke Kentucky from obtaining a visual reading off of the register.
10. Explain whether it is Duke Kentucky's policy to test a meter when it malfunctions.
11. State whether it is accurate that meter 1183200 was not tested when it malfunctioned.

12. State whether meter 1183200 has been tested to date, and if so, when.
13. State whether the data log would notify Duke Kentucky of a meter malfunction during a billing cycle.
14. State when and the manner in which Duke Kentucky first contacted Ms. Cole about her meter malfunctioning.
15. Provide a copy of Duke Kentucky's notice to Ms. Cole regarding any deviation from historical gas usage, as required by Duke Kentucky's Fourth Revised Tariff Sheet No. 24, Section 5(3).
16. Explain how and why Jeane Cole's natural gas meter readings were initially not being effectively linked in Duke Kentucky's customer information system to Ms. Cole's account during the period of March 2022 through July 2022.
17. Explain in detail how and when Duke Kentucky fixed the bad link to the customer information system.
18. State whether Duke Kentucky communicated to Ms. Cole about the issue with the bad link in Duke Kentucky's customer information system, and if so, when.
19. Explain in detail how Duke Kentucky estimated Ms. Cole's bills and provide any calculations made.
20. Refer to Duke Kentucky's Answer to the Complaint, paragraph 6, stating that after Duke Kentucky associated the gas meter to Ms. Cole's account, Duke Kentucky used actual meter reads to revise previously estimated meter reads for April 13, 2022, May 12, 2022, June 13, 2022, and July 14, 2022. Provide a description of the bill true-up process used in this case, including the related written policy or procedure for the true-up process used. Include the name of the person or persons who must approve the true-up.



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

DATED JUL 20 2023

cc: Parties of Record

Case No. 2022-00435

Jeane Cole
319 Ervin Terrace
Dayton, KENTUCKY 41074

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