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September 5, 2025

Via Email to PSCED@ky.gov

Ms. Linda C. Bridwell, P.E.
Executive Director
Public Service Commission
211 Sower Boulevard
Frankfort, Kentucky 40602

Re: *Sam Ollie Droganes v. Duke Energy Kentucky, Inc.*– **Case No. 2024-00123**

Dear Ms. Bridwell:

Please find attached for filing with the Commission, Duke Energy Kentucky, Inc.'s Requests for Information to the Complainant in the above-styled case.

This is to certify that this is a true and accurate copy of the document that was filed via email with the Commission on September 5, 2025. A copy of this filing was emailed to the Commission and mailed via U.S. Mail on September 5, 2025 to the Complainant.

If you have any questions, please let me know.

Very truly yours,

A handwritten signature in black ink that reads "L. Allyson Honaker".

L. Allyson Honaker

Enclosure

COMMONWEALTH OF KENTUCKY

BEFORE THE KENTUCKY PUBLIC SERVICE COMMISSION

IN THE MATTER OF:

SAM OLLIE DROGANES	COMPLAINANT)	
)	
V.)	CASE NO.
)	2024-00123
DUKE ENERGY)	
KENTUCKY, INC.	DEFENDANT)	

**INITIAL DATA REQUESTS OF DUKE ENERGY KENTUCKY, INC. TO THE
COMPLAINANT SAM OLLIE DROGANES**

Filed: September 5, 2025

I. DEFINITIONS AND INSTRUCTIONS

1. With respect to each discovery request, all information is to be divulged that is within the knowledge, possession or control of the parties to whom it is addressed, including their agents, employees, advisors, consultants, attorneys and/or investigators. *Each request is addressed to Sam Ollie Drogranes unless otherwise stated.*

2. Please identify the witness(es) who will be prepared to answer questions concerning each request.

3. These requests shall be deemed continuing so as to require further and supplemental responses if the party receives or generates additional information within the scope of these requests between the time of the response and the time of any hearing conducted hereon.

4. All answers must be separately and fully stated in writing under oath.

5. Where a data request calls for an answer in more than one part, each part should be separated in the answer so that the answer is clearly understandable.

6. If any request appears confusing, please request clarification directly from counsel for Duke Energy Kentucky, Inc. (“Duke Energy Kentucky”).

7. For purpose of these discovery requests, the following terms shall have meanings set forth below:

- (a) As used herein, “document,” “documentation” and/or “record,” whether stated as the singular or the plural, means any course of binders, book, pamphlet, periodical, letter, correspondence, memoranda, including but not limited to, any memorandum or report of a meeting or telephone or other conversation, invoice, account, credit memo, debit memo, financial statement, general ledger, ledger, journal, work papers, account work

papers, report, diary, telegram, record, contract, agreement, study, draft, telex, handwritten or other note, sketch, picture, photograph, plan, chart, paper, graph, index, tape, data processing card, data processing disc, data cells or sheet, check acceptance draft, e-mail, studies, analyses, contracts, estimates, summaries, statistical statements, analytical records, reports and/or summaries of investigations, opinions or reports of consultants, opinions or reports of accountants, trade letters, comparisons, brochures, pamphlets, circulars, bulletins, notices, forecasts, electronic communication, printouts, all other data compilations from which information can be obtained (translated if necessary by defendants into usable form), any preliminary versions, drafts or revisions of any of the foregoing, and/or any other written, recorded, transcribed, punched, taped, filmed or graphic matter, however produced or reproduced and regardless of origin or location, in the possession, custody and/or control of the defendant and/or their agents, accountants, employees, representatives and/or attorneys. "Document" and "record" also mean all copies of documents by whatever means made, if the copy bears any other markings or notations not found on the original.

- (b) The terms "relating to," "referring to," "referred to," "pertaining to," "pertained to" and "relates to" means referring to, reporting, embodying, establishing, evidencing, comprising, connected with, commenting on, responding to, showing, describing, analyzing, reflecting, presenting and/or constituting and/or in any way involving.

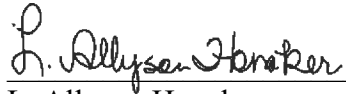
- (c) The terms “and,” “or,” and “and/or” within the meaning of this document shall include each other and shall be both inclusive and disjunctive and shall be construed to require production of all documents, as above-described, in the broadest possible fashion and manner.
- (d) Unless otherwise noted, the term Complainant shall mean Sam Ollie Drogranes. The term “you” shall be deemed to refer to Sam Ollie Drogranes.
- (e) The term “Commission” shall mean the Kentucky Public Service Commission.
- (f) To “identify” shall mean:
 - (1) With respect to a document, to state its date, its author, its type (for example, letter, memorandum, chart, photograph, sound reproduction, etc.), its subject matter, its present location, and the name of its present custodian. The document may be produced in lieu of supplying the foregoing information. For each document which contains information as privileged or otherwise excludable from discovery, there shall be included a statement as to the basis for such claim of privilege or other grounds for exclusion.
 - (2) With regard to a natural person, to state his or her full name, last known employer or business affiliation, title and last known home address.
 - (3) With regard to a person other than a natural person, state the title of that person, any trade name, or corporate name or partnership name

used by that person, and the principal business address of that person.

- (g) To “produce” or to “identify and produce,” shall mean that Company shall produce each document or other requested tangible thing. For each tangible thing which Company contends is privileged or otherwise excludable from discovery, there shall be included a statement as to the basis for such claim of privilege or other grounds for exclusion.
- (h) The terms “Party or Parties” shall mean any organization, person, corporation, entity, etc., which intervened in the above-captioned proceeding and shall further include the Commission Staff.

- 8. The information requested herein shall be filed no later than September 19, 2025.

Respectfully submitted,



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and

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Counsel for Duke Energy Kentucky, Inc.

1. Please confirm that Mr. Drogranes is the owner of 407 Pike Street, Covington, Kentucky.
2. Please confirm that the building located at 407 Pike Street, Covington, Kentucky has been separated for electric and gas service by the first floor (which has historically been deemed commercial) and the second floor (which has historically been deemed residential) for many years.
3. Please confirm that at some point in the recent past that Mr. Drogranes has rewired the building and now has only one electric meter for the entire building.
4. Please confirm the date that the building was rewired and only one electric meter is being used for the entire building.
5. Please state the date the work was performed to rewire the building.
6. Please state the name of the person that completed the electric work to rewire the building.
7. Please confirm that the second electric meter was removed from 407 Pike Street, Covington, Kentucky and state who removed that meter.
8. Please state where Duke Energy Kentucky's electric meter that was removed is now located.
9. Did Mr. Drogranes inform Duke Energy Kentucky that he was having the building rewired and removing an electric meter? If yes, please provide the date and any communications between Mr. Drogranes and Duke Energy Kentucky regarding this. If no, please state why Mr. Drogranes did not inform Duke Energy Kentucky of the rewiring and the removal of the electric meter.
10. Please confirm that there is a commercial sign for the former business still located at 407 Pike Street, Covington, Kentucky.