

CASE 2024-00123, RESPONSES TO COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION

1. I will refrain here to mention any and all communication that has been tendered among the three parties, me, Duke Energy's counsel, and the PSC, as the commission is in possession of all said communication of this nature. Otherwise, please see my February 7, 2025 letter to the PSC which contains a listing of phone calls and dates to Duke about the rate change and commercial versus residential status. In addition, since that date there have been several other calls from Duke representatives. Three of them occurred in late August or early September, 2025 but I did not record the dates. The Duke people wanted to access the inside of my property to check the meters to confirm there was only one electric meter and one gas meter for the entire place. They did this and subsequently sent a Duke Investigator to the premises, who looked at the same meters and also toured the first floor of the building and informed me that he could clearly tell that the entire place was my residence and would communicate that fact to Duke.
2. This will confirm that the Kenton County Property Valuation Administrator classifies 207 Pike Street, Covington, KY. 41011 as "commercial property, retail with apartment".
3. I would add though, that Covington zoning regulations are more accurately applied. Covington Zoning Ordinance, section 02.04.3 classifies the building as a mixed-use structure and includes the subsection 02.04.3.C-the Downtown Core (DTC). Further the zoning appendices 6.4 HPO Zone Description and Maps, include an Historic Preservation Overlay acknowledging that "commercial and mixed-use buildings are typical in Covington's downtown, but are also found throughout the historic **residential** (emphasis added) neighborhoods." ..." The architecture of the Mutter Gottes Old Town Historic Preservation Overlay represents an important period in Covington's development as a **residential** (emphasis added) community. The area is significant as a **residential** (emphasis added) neighborhood...The area consists of primarily intact mid to late nineteenth century domestic buildings with a few commercial buildings on prominent street corners."
4. Further an AI query posited that generally cities have more specificity and detailed zoning regulations than counties. And, it also declared that when a city is located within a county, the city's specific zoning laws take precedence within its (city's) boundaries.

I believe the above to answer the PSC's two-question, First Request For Information to me and respectfully submit same. Thank you.

Sam Droganes

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**SEP 22 2025**

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