

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC ANNUAL COST)	
RECOVERY FILING FOR DEMAND)	CASE NO.
SIDE MANAGEMENT BY DUKE)	2017-00427
ENERGY KENTUCKY, INC.)	

STAFF'S POST-HEARING DATA REQUEST

Duke Energy Kentucky, Inc. (Duke Kentucky”), pursuant to 807 KAR 5:001, is to file with the Commission an original in paper medium and an electronic version of the following information. The information requested herein is due June 1, 2018. Responses to requests for information shall be appropriately bound, tabbed, and indexed. Each response 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 governmental agency, be accompanied by a signed certification of the preparer or 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 amendments to any prior response if it obtains information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which Duke

Kentucky fails or refuses to furnish all or part of the requested information, it shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention should be given to copied 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 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. Refer to the Direct Testimony of Timothy J. Duff (“Duff Testimony”), Attachment TJD-1. Provide the avoided capacity costs per kW and the avoided energy costs per kWh used in calculating each of the cost-effectiveness scores. Provide a detailed explanation of how the costs were calculated and provide all documents supporting the calculations, including all assumptions such as escalation rates and source data.

2. Refer to Duke Kentucky’s Petition for Confidential Treatment filed on March 6, 2018. At page 2, paragraph 2, Duke Kentucky states that, “the Attachments show detailed calculations of avoided costs information by program used by the Company in evaluating its demand side management programs.”

a. Explain in detail why energy and capacity prices forecasts that are now seven years old need to be confidential.

b. Confirm whether the avoided energy costs and avoided capacity costs that are requested to be kept confidential are used in the Duff Testimony Attachment

TJD-1 to calculate the cost effectiveness scores. If this cannot be confirmed, explain in detail why those costs need to be kept confidential.

3. Refer to Duke Kentucky's Petition for Confidential Treatment filed on May 3, 2018, and the publicly available version of Duke Kentucky's response to Staff's Third Data Request, Item 7.

a. Confirm whether the values shown in the column labeled "Delivery year" are publicly available.

b. Confirm whether the values shown in the column labeled "Total DR MWs" are publicly available.

c. Confirm whether the values shown in the column labeled "BRA Price (\$/MW-Year)" are publicly available.

d. Based on the publicly available portion of Duke Kentucky's response, explain whether there is information that is requested to be confidential that cannot be readily determined from publicly available information. If not, explain in detail why the request for confidentiality should be granted.

4. Explain whether the projected capacity reductions of any of Duke Kentucky's demand side management programs, other than PowerShare and Power Manager, are recognized in future delivery years as increasing Duke Kentucky's supply resources or reducing Duke Kentucky's PJM load obligation.

a. For each program, explain in detail.

b. If no programs are so recognized, explain whether the historic load reductions achieved by the demand side management programs, other than PowerShare

and Power Manager, are reflected as reductions to Duke Kentucky's PJM load obligation in future years.

5. Confirm that PJM does not reduce Duke Kentucky's projected kW value of the PowerShare and Power Manager Programs to reflect a forced outage rate. If this cannot be confirmed, provide the forced outage rate and the basis for its derivation.

6. Explain in detail why Duke Kentucky allows 15 percent of the Home Energy Assistance Program collections to be used for administrative expenses, rather than a 10 percent fee as agreed to by Kentucky Utilities Company and Louisville Gas and Electric Company in Case No. 2016-00370.¹


Gwen R. Pinson
Executive Director
Public Service Commission
P.O. Box 615
Frankfort, KY 40602

DATED **MAY 25 2018**

cc: Parties of Record

¹ Case No. 2016-00370, *Electronic Application of Kentucky Utilities Company for an Adjustment of its Electric Rates and for Certificates of Public Convenience and Necessity*, (Ky. PSC June 22, 2017), at 10.

*Adele Frisch
Duke Energy Kentucky, Inc.
139 East Fourth Street
Cincinnati, OH 45201

*Rocco O D'Ascenzo
Duke Energy Kentucky, Inc.
139 East Fourth Street
Cincinnati, OH 45201

*L Allyson Honaker
Goss Samford, PLLC
2365 Harrodsburg Road, Suite B325
Lexington, KENTUCKY 40504

*David S Samford
Goss Samford, PLLC
2365 Harrodsburg Road, Suite B325
Lexington, KENTUCKY 40504

*Debbie Gates
Duke Energy Kentucky, Inc.
139 East Fourth Street
Cincinnati, OH 45201

*Kent Chandler
Assistant Attorney General
Office of the Attorney General Office of Rate
700 Capitol Avenue
Suite 20
Frankfort, KENTUCKY 40601-8204

*Duke Energy Kentucky, Inc.
139 East Fourth Street
Cincinnati, OH 45202

*E. Minna Rolfes-Adkins
Paralegal
Duke Energy Kentucky, Inc.
139 East Fourth Street
Cincinnati, OH 45201