

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

MICHAEL T. MOORE)	
)	
COMPLAINANT)	
)	
V.)	CASE NO. 2011-00176
)	
DUKE ENERGY KENTUCKY, INC.)	
)	
DEFENDANT)	

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

Duke Energy Kentucky, Inc. ("Duke") is to file with the Commission the original and ten copies of the following information, with a copy to all parties of record. The information requested herein is due no later than ten days from the date of this request. 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 shall make timely amendment 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 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 applicable, the requested information shall be separately provided for total company operations and jurisdictional operations.

1. Duke's June 6, 2011 Answer states that meter number 108011234 was installed on or about February 26, 2010.

a. State when Duke determined that meter number 108011234 was not registering the voltage properly.

b. Was there any test that Duke could have or should have performed to determine if meter number 108011234 was registering the voltage properly at the time of installation?

c. State how Duke determined that an additional lug was required in the meter base of meter number 108011234 for the meter to register the voltage properly.

d. Complainant states that the meter was changed on approximately October 10, 2010 and Duke states the meter was changed on approximately February 26, 2010. Explain the discrepancy in these dates.

e. Explain why Duke contends it should not have responsibility for paying some or all of the costs of the additional lug, given that it appears Duke changed the meter on its own initiative and not at the request of the Complainant.

2. If Duke has initiated a system-wide project to replace analog meters with digital meters, provide the following information:

a. The date that analog meters began being replaced and the anticipated date to complete the meter replacements.

b. The number of analog electric meters replaced during each year since the replacements began through July 31, 2011.

c. The number of analog meters projected to be replaced each year from August 1, 2011 through the completion of the replacement project.

d. If not provided elsewhere, provide a detailed discussion of Duke's plans for the analog meter replacement.

3. Prior to the replacement of meter number 108011234, did Duke recognize that some existing meter bases would need to be changed to be compatible with the new digital meters?

a. If yes, describe the procedures adopted to identify the bases that would need to be changed and the timing and manner of customer notice, and provide copies of any such procedures that are in writing.

b. If no, when did Duke first recognize that some meter bases would need to be changed and how did Duke become aware of this?

c. Provide an analysis of the cost to replace the analog meters with digital meters.

4. How many meter bases needed to be changed as of July 31, 2011 to accommodate digital meters, and how many are anticipated to need changing during the remainder of the meter replacement project?

5. In each case to date where the meter base needed to be changed to accommodate a digital meter, was the customer responsible for having the base changed and for the full cost? If no, explain the number of exceptions and the circumstances of each one.

6. Explain why Duke contends it should not have responsibility for paying some or all of the costs to replace a meter base that is not damaged and that functions properly with the customer's existing analog meter.

7. Complainant's complaint alleges that the building at 330 Center Street Bellevue, Kentucky has approximately 30 meters.

a. How many analog electric meters has Duke replaced with digital meters at 330 Center Street, Bellevue, Kentucky? Provide a listing of the meter numbers replaced, the replacement meter number, and the dates replaced.

b. If all of the analog electric meters have not been replaced with digital meters at 330 Center Street, Bellevue, Kentucky, does Duke intend to replace all of the remaining analog electric meters with digital meters at that location?

c. Has Duke required that the Complainant assume the costs of all meter base replacements for all of the analog electric meters that have been replaced with digital meters at 330 Center Street, Bellevue, Kentucky? If not, explain the amounts that Complainant has been required to pay and the basis for the requirement.



Jeff Derouen
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cc: Parties of Record

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