COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

CHARLENE MARIE WYATT COMPLAINANT V. DUKE ENERGY KENTUCKY, INC. DEFENDANT

CASE NO. 2015-00309

COMMISSION STAFF'S INITIAL REQUEST FOR INFORMATION TO DUKE ENERGY KENTUCKY, INC

Duke Kentucky Energy, Inc. ("Duke Kentucky"), pursuant to 807 KAR 5:001, is to file with the Commission the original and eight copies of the following information, with a copy to all parties of record. The information requested herein is due within ten days of 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 Kentucky 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 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. Provide copies of Charlene Marie Wyatt's ("Complainant") bills from January 2013 to the present.

Refer to Duke Kentucky's Answer and Motion to Dismiss, pages 2–3, where Duke Kentucky states that it adjusted the bill for electricity consumption for unit 302. Provide proof, preferably a copy of the bill, that this adjustment occurred.

3. Provide a billing and consumption history for unit 302 from January 2013 to when Duke Kentucky discovered the meters were assigned to the incorrect apartments.

4. Refer to 807 KAR 5:006, Section 10, which requires prompt and complete investigation of complaints with response to the customer advising of the utilities findings, and records to be maintained for at least two years of all written complaints for utility service. Describe Duke Kentucky's efforts to comply with the requirements of this

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regulation with respect to this complaint and provide any evidence supporting these efforts.

5. Refer to 807 KAR 5:006, Section 11(3), which requires: (a) a utility to monitor usage at least quarterly according to tariffed procedures; (b) procedures sufficient to identify unusual deviations in usage and reasonable means to determine the cause; and (c) that a meter test be performed where customer usage is unduly high to determine if average meter error is greater than +/- 2 percent. Describe Duke Kentucky's efforts to comply with the requirements of this regulation with respect to this complaint and provide any evidence supporting these efforts.

6. Refer to 807 KAR 5:006, Section 26(4)(e), which requires, *inter alia*, electric utilities to inspect at intervals not less than two years all electric facilities operating at voltages of less than 69kV to the point of service, including meters. Describe Duke Kentucky's efforts to comply with the requirements of this regulation with respect to this complaint and provide any evidence supporting these efforts.

7. Refer to 807 KAR 5:041, Section 18(4), which requires that when a number of meters are placed in the same cabinet or upon the same board, each meter must be tagged or marked to indicate the circuit being metered. Describe Duke Kentucky's efforts to comply with the requirements of this regulation with respect to this complaint and provide any evidence supporting these efforts.

DATED FEB 0 2 2016

cc: Parties of Record

Derouen ecutive Director blic Service Commission O. Box 615 Frankfort, KY 40602

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