

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF DUKE ENERGY)	CASE NO.
KENTUCKY, INC. TO AMEND ITS DEMAND SIDE)	2019-00277
MANAGEMENT PROGRAMS)	

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

Duke Energy Kentucky, Inc. (Duke Kentucky), pursuant to 807 KAR 5:001, is to file with the Commission the original in paper medium and an electronic version of the following information. The information requested herein is due on or before November 22, 2019. Responses to requests for information in paper medium shall be appropriately bound, tabbed, and indexed. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

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 applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a document 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 Duke Kentucky's response to Staff's First Request for Information (Staff's First Request), Item 2b. Explain why Duke Kentucky is proposing to add Energy Star Advanced power strips to the Online Saving Store when the Total Resource Cost (TRC) and Rate Impact Measure (RIM) cost-effectiveness scores are less than one.

2. Refer to Duke Kentucky's response to Staff's First Request, Item 3.

- a. Explain whether a Duke Kentucky customer must opt into the My Home Energy Report (MyHER) Program in order to view their usage and other information on the Duke Energy Mobile App.

- b. Provide the date of the proposed expansion on the MyHER program on the Duke Energy Mobile App.

3. Refer to Duke Kentucky's response to Staff's First Request, Item 4b, Attachment, page 1 of 1. For each measure whose TRC cost-effectiveness score is less than one, explain why Duke Kentucky is proposing the demand-side management (DSM) measure.

4. Refer to Duke Kentucky's response to Staff's First Request for Information, Item 6b. Also, refer to Case No. 2019-00271.¹ Explain why the new CIS deployment project, as described in the Direct Testimony of Retha Hunsicker in Case No. 2019-00271, does not allow for the credit associated with a Critical Peak Event to be automatically calculated.

5. Refer to Duke Kentucky's response to Staff's First Request, Item 7(a)vii. Explain what is meant by the statement that acquisition efforts are subject to the proposed budget.

6. Refer to Duke Kentucky's Response to Staff's First Request, Item 12, and Duke Kentucky's response to the Attorney General's First Request for Information, Item 14. Provide a copy of any similar Peak Time Rebate (PTR) programs Duke Kentucky used for research in the development of the proposed PTR program.

¹ Case No. 2019-00271, *Electronic Application of Duke Energy Kentucky, Inc. for 1) an Adjustment of the Electric Rates; 2) Approval of New Tariffs; 3) Approval of Accounting Practices to Establish Regulatory Assets and Liabilities; and 4) All Other Required Approvals and Relief* (Ky. PSC filed Sept. 3, 2019).



Gwen R. Pinson
Executive Director
Public Service Commission
P.O. Box 615
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DATED NOV 07 2019

cc: Parties of Record

Case No. 2019-00277

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