

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC INVESTIGATION OF HOME	)	
ENERGY ASSISTANCE PROGRAMS OFFERED	)	CASE NO.
BY INVESTOR-OWNED UTILITIES PURSUANT	)	2019-00366
TO KRS 278.285(4)	)	

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 and an electronic version of the following information. The information requested herein is due on January 3, 2020. 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 the 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 shall 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 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. Confirm that Duke Kentucky's HEA program is a crisis program and not a program that provides recurring benefits to eligible enrolled applicants.
2. Explain how Duke Kentucky or Northern Kentucky Community Action Commission (NKCAC), or both, developed the 15 percent fee to administer the HEA program.
3. Refer to Duke Kentucky's response to Commission Staff's First Request for Information (Staff's First Request), Item 2. The response is insufficient. Explain how Duke Kentucky selected NKCAC to administer its HEA program.
4. Provide the changes to its program Duke Kentucky believes are necessary to ensure available funds are fully, but properly, expended for the benefit intended.

5. Explain whether Duke Kentucky conducts or authorizes a third party to conduct an audit of NKCAC's administration of the HEA program to ensure funds are spent appropriately.

6. Provide a copy of one weekly, one monthly, and one annual report that NKCAC provides to Duke Kentucky.

7. Identify any impediments or adverse consequences if the Commission raised Duke Kentucky's income eligibility requirement from the current level to 200 percent of the poverty level.

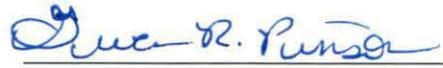
8. Refer to Duke Kentucky's response to Staff's First Request, Item 5. Confirm that every applicant during the last full program year was eligible for each HEA program. If confirmed, explain what characteristics of Duke Kentucky's HEA programs allow for every applicant to be eligible for and receive assistance from each HEA program.

9. Refer to Duke Kentucky's response to Staff's First Request, Item 6.

a. Provide the average benefit level for each of the past five program years, and the average monthly benefit level over the same time period.

b. Explain whether there is a maximum benefit level per participant, and if so, how that maximum amount is derived.

10. Based upon its experience, explain what Duke Kentucky believes are the ideal HEA eligibility requirements.



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

DATED DEC 16 2019

cc: Parties of Record

\*Honorable Allyson K Sturgeon  
Senior Corporate Attorney  
LG&E and KU Energy LLC  
220 West Main Street  
Louisville, KENTUCKY 40202

\*John B Brown  
Chief Financial Officer  
Delta Natural Gas Company, Inc.  
3617 Lexington Road  
Winchester, KY 40391

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

\*Brooke Wancheck  
Asst. Counsel  
Columbia Gas of Kentucky, Inc.  
2001 Mercer Road  
P. O. Box 14241  
Lexington, KY 40512-4241

\*Jenny Lowery  
Delta Natural Gas Company, Inc.  
3617 Lexington Road  
Winchester, KY 40391

\*Lindsey Ingram  
STOLL KEENON OGDEN PLLC  
300 West Vine Street  
Suite 2100  
Lexington, KENTUCKY 40507-1801

\*Cheryl A MacDonald  
Columbia Gas of Kentucky, Inc.  
290 W. Nationwide Blvd.  
Columbus, OHIO 43215

\*Judy M Cooper  
Director, Regulatory Services  
Columbia Gas of Kentucky, Inc.  
2001 Mercer Road  
P. O. Box 14241  
Lexington, KY 40512-4241

\*Lawrence W Cook  
Assistant Attorney General  
Office of the Attorney General Office of Rate  
700 Capitol Avenue  
Suite 20  
Frankfort, KENTUCKY 40601-8204

\*Christen M Blend  
American Electric Power Service Corporation  
1 Riverside Plaza, 29th Floor  
Post Office Box 16631  
Columbus, OHIO 43216

\*Justin M. McNeil  
Office of the Attorney General Office of Rate  
700 Capitol Avenue  
Suite 20  
Frankfort, KENTUCKY 40601-8204

\*Minna Sunderman  
Duke Energy Kentucky, Inc.  
139 East Fourth Street  
Cincinnati, OH 45201

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

\*Kentucky Power Company  
Kentucky Power Company  
855 Central Avenue, Suite 200  
Ashland, KY 41101

\*Monica Braun  
STOLL KEENON OGDEN PLLC  
300 West Vine Street  
Suite 2100  
Lexington, KENTUCKY 40507-1801

\*Kentucky-American Water Company  
Kentucky-American Water Company  
2300 Richmond Road  
Lexington, KY 40502

\*Karen Greenwell  
Attorney  
Wyatt, Tarrant & Combs, LLP  
250 West Main Street  
Suite 1600  
Lexington, KENTUCKY 40507-1746

\*Honorable Mark R Overstreet  
Attorney at Law  
Stites & Harbison  
421 West Main Street  
P. O. Box 634  
Frankfort, KENTUCKY 40602-0634

\*Hector Garcia  
American Electric Power Service Corporation  
1 Riverside Plaza, 29th Floor  
Post Office Box 16631  
Columbus, OHIO 43216

\*Kathie McDonald-McClure  
Attorney  
Wyatt, Tarrant & Combs, LLP  
2600 PNC Plaza  
500 West Jefferson Street  
Louisville, KENTUCKY 40202

\*Columbia Gas of Kentucky, Inc.  
Columbia Gas of Kentucky, Inc.  
290 W Nationwide Blvd  
Columbus, OH 43215

\*Delta Natural Gas Company, Inc.  
Delta Natural Gas Company, Inc.  
3617 Lexington Road  
Winchester, KY 40391

\*Kentucky Utilities Company  
Kentucky Utilities Company  
220 W. Main Street  
P. O. Box 32010  
Louisville, KY 40232-2010

\*Rick E Lovekamp  
Manager - Regulatory Affairs  
LG&E and KU Energy LLC  
220 West Main Street  
Louisville, KENTUCKY 40202

\*Louisville Gas and Electric Company  
Louisville Gas and Electric Company  
220 W. Main Street  
P. O. Box 32010  
Louisville, KY 40232-2010

\*Robert Conroy  
LG&E and KU Energy LLC  
220 West Main Street  
Louisville, KENTUCKY 40202

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

\*Roger McCann  
Executive Director  
Community Action Kentucky  
101 Burch Court  
Frankfort, KENTUCKY 40601

\*Sara Judd  
LG&E and KU Energy LLC  
220 West Main Street  
Louisville, KENTUCKY 40202

\*Sidney Gates  
Community Action Kentucky  
101 Burch Court  
Frankfort, KENTUCKY 40601