

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF DUKE)	CASE NO.
ENERGY KENTUCKY, INC. TO AMEND ITS)	2020-00266
DEMAND SIDE 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 an electronic version of the following information. The information requested herein is due on November 9, 2020. The Commission directs Duke Kentucky to the Commission's March 16, 2020 and March 24, 2020 Orders in Case No. 2020-00085¹ regarding filings with the Commission. The Commission expects the original documents to be filed with the Commission within 30 days of the lifting of the current state of emergency. All responses 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

¹ Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC Mar. 16, 2020), Order at 5–6. Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC Mar. 24, 2020), Order at 1–3.

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 Duke Kentucky obtains information that indicates 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, Duke Kentucky 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. Refer to Duke Kentucky's response to Staff's First Request for Information (Staff's First Request), Item 6. Also, refer to the final Order in Case No. 2019-00277,² specifically pages 13–14 where the Commission states:

In Case no. 2017-00427,³ the Commission stated that the cost-effectiveness of Duke Kentucky's DSM programs would

² Case No. 2019-00277 *Electronic Application of Duke Energy Kentucky, Inc. to Amend Its Demand Side Management Programs* (Ky. PSC Apr. 27, 2020).

be closely reviewed in the 2019 DSM filing. Hence the Commission finds that the individual modifications that are not cost-effective, as demonstrated by a TRC score of less than one, are unreasonable and should not be approved.

a. Given the above finding, explain why Duke Kentucky is requesting approval of those measures within the Residential Energy Assessment Program whose Total Resource Cost (TRC) scores are less than one.

b. Given the above finding, explain why Duke Kentucky is requesting approval of those measures within the Smart Saver Prescriptive Program whose TRC scores are less than one.

2. Refer to Duke Kentucky's Response to Staff's First Request for Information, Item 7a(2). Provide the updated cost-effective test results for each individual measure within the Non-Residential Customer Incentive program.

3. Refer to Duke Kentucky's Response to Staff's First Request for Information, Item 8a.

a. Provide the updated cost-effective test results for each individual measure within the Multifamily Energy Efficiency Program.

b. Explain how Property Manager feedback affects whether the Smart thermostats under consideration for the Multifamily program will be implemented.

³ Case No. 2017-00427, *Electronic Annual Cost Recovery Filing for Demand Side Management by Duke Energy Kentucky, Inc.* (Ky. PSC Oct. 15, 2018).



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DATED OCT 26 2020

cc: Parties of Record

Case No. 2020-00266

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