

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF:

JOSEPH J. OKA	COMPLAINANT)	
)	
V.)	CASE NO.
)	2021-00324
DUKE ENERGY)	
KENTUCKY, INC.	DEFENDANT)	

**PETITION OF DUKE ENERGY KENTUCKY, INC. FOR CONFIDENTIAL
TREATMENT OF INFORMATION CONTAINED IN ITS RESPONSES TO
COMMISSION STAFF’S SECOND REQUEST FOR INFORMATION
ISSUED JANUARY 18, 2022**

Duke Energy Kentucky, Inc. (Duke Energy Kentucky or Company), pursuant to 807 KAR 5:001, Section 13, respectfully requests the Commission to classify and protect certain information provided by Duke Energy Kentucky in its responses to Data Request No. 3. Specifically, the Company requests confidential treatment for Attachments 2(a)-(i). The information that Duke Energy Kentucky seeks confidential treatment on generally includes customer account information.

In support of this Petition, Duke Energy Kentucky states:

1. The Kentucky Open Records Act exempts from disclosure certain commercial information. KRS 61.878(1)(c). To qualify for this exemption and, therefore, maintain the confidentiality of the information, a party must establish that disclosure of the commercial information would permit an unfair advantage to competitors of that party. Public disclosure of the information identified herein would, in fact, prompt such a result for the reasons set forth below.

2. The information in Attachments 2(a)-(i) contains specific customer account information, including account numbers. This information is generally recognized as confidential in the energy industry. To protect the customer identified in these attachments, the Company recommends this information be considered confidential.

3. The Confidential Information is distributed within Duke Energy Kentucky, only to those who must have access for business reasons and is generally recognized as confidential and proprietary in the energy industry.

4. The Confidential Information for which Duke Energy Kentucky is seeking confidential treatment is not known outside of Duke Energy Corporation.

5. Duke Energy Kentucky does not object to limited disclosure of the Confidential Information described herein, pursuant to an acceptable protective agreement, with the Attorney General or other intervenors with a legitimate interest in reviewing the same for the purpose of participating in this case.

6. This information was, and remains, integral to Duke Energy Kentucky's effective execution of business decisions and safety of its systems. And such information is generally regarded as confidential or proprietary. Indeed, as the Kentucky Supreme Court has found, "information concerning the inner workings of a corporation is 'generally accepted as confidential or proprietary.'" *Hoy v. Kentucky Industrial Revitalization Authority*, 904 S.W.2d 766, 768 (Ky. 1995).

7. In accordance with the provisions of 807 KAR 5:001, Section 13(3), the Company is filing one copy of the Confidential Information separately under seal.

8. Duke Energy Kentucky respectfully requests that the Confidential Information be withheld from public disclosure indefinitely to preserve the confidential personal identification information for customers. Information such as account numbers, names, and addresses, may

remain unchanged as long as the individual is a customer of the Company. Therefore, an indefinite preservation of confidential information for this personal identification information is reasonable.

9. To the extent the Confidential Information becomes generally available to the public, whether through filings required by other agencies or otherwise, Duke Energy Kentucky will notify the Commission and have its confidential status removed, pursuant to 807 KAR 5:001 Section 13(10)(a).

WHEREFORE, Duke Energy Kentucky, Inc., respectfully requests that the Commission classify and protect as confidential the specific information described herein.

Respectfully submitted,

/s/ Rocco D'Ascenzo

Rocco O. D'Ascenzo (92796)
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and

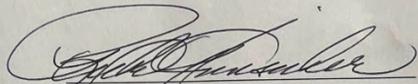
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Counsel for Duke Energy Kentucky, Inc.

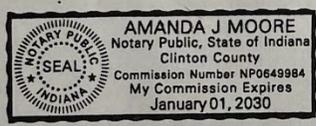
VERIFICATION

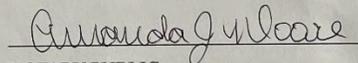
STATE OF INDIANA)
) SS:
COUNTY OF TIPPECANOE)

The undersigned, Retha Hunsicker, VP Customer Connect-Solutions, being duly sworn, deposes and says that she has personal knowledge of the matters set forth in the foregoing data request and that it is true and correct to the best of her knowledge, information and belief.


Retha Hunsicker Affiant

Subscribed and sworn to before me by Retha Hunsicker on this 17th day of February, 2022.




NOTARY PUBLIC

My Commission Expires: Jan. 1, 2030

KyPSC Case No. 2021-00324
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Duke Energy Kentucky
Case No. 2021-00324
STAFF Second Set Data Requests
Date Received: January 18, 2022

STAFF-DR-02-001

REQUEST:

Refer to the Complaint, Exhibit 3, which includes an electric usage snapshot and a gas usage snapshot, and to Exhibits 4, 5, 6, and 7, which include a gas usage snapshot but not an electric usage snapshot. Also refer to the April 27, 2020 Order in Case No. 2019-00271,¹ page 54, which approved revisions to the bill format that were only cosmetic in nature. Finally, refer to Duke Kentucky's Tariff, Appendix A, which consists of a sample bill, as approved by the Commission in Case No. 2019-00271, with an electric usage snapshot and a gas usage snapshot. Explain when Duke Kentucky removed the electric usage snapshot from residential customer bills and provide the reason for removing the electric usage snapshot.

RESPONSE:

It was discovered there was a defect impacting some accounts which prevented the electric graph from being printed on the bill. This issue was resolved Feb. 14 and the graph will appear on the customer's next bill.

PERSON RESPONSIBLE: Abigail Johnson

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 Regulator Assets and Liabilities; and 4) All Other Required Approvals and Relief* (Ky. PSC Apr. 27, 2020), Order at 54.

**Duke Energy Kentucky
Case No. 2021-00324
STAFF Second Set Data Requests
Date Received: January 18, 2022**

STAFF-DR-02-002

REQUEST:

Provide a copy of a sample bill for a residential eligible customer-generator as defined in KRS 278.465(1) that will be issued after the Customer Connect Program becomes operational in April 2022.

RESPONSE:

Please see STAFF-DR-02-002 Attachment. This is a *sample* bill and may not reflect current fees, riders, etc.

PERSON RESPONSIBLE: Retha Hunsicker



SALLY SAMPLE
 125 SAMPLE STREET
 CITY, STATE 99999

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Bill date Dec 16, 2021
 For service Nov 4 - Dec 9
 36 days

Account number **9999 9999 9999**

Billing summary

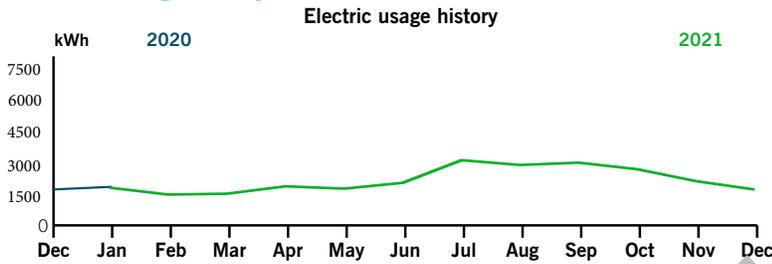
Previous Amount Due	\$440.04
Payment Received Jan 19	-440.04
Current Gas Charges	150.66
Current Electric Charges	292.51
Taxes	21.58
Total Amount Due Jan 06	\$464.75



Thank you for your payment.

Introducing Share the Light Fund, formerly WinterCare. Discover the power of community, whether you need help or want to help others. Add a gift to your bill or learn more at duke-energy.com/ShareTheLight.

Your usage snapshot

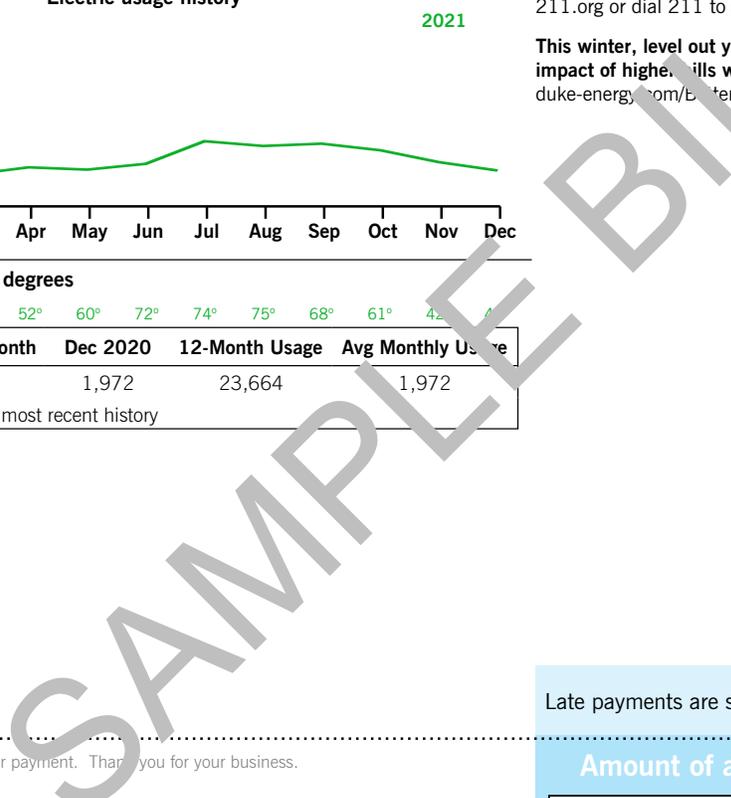


Average temperature in degrees

35°	33°	29°	47°	52°	60°	72°	74°	75°	68°	61°	42°	41°
Current Month	Dec 2020	12-Month Usage	Avg Monthly Usage									
Electric (kWh)	2,497	1,972	23,664	1,972	12-month usage based on most recent history							

Do you or someone you know need help with energy bills or other essentials as a result of the pandemic? Help is available through new and existing assistance programs for those who qualify. Visit 211.org or dial 211 to get started.

This winter, level out your monthly bill payments to help ease the impact of higher bills with our Budget Billing plan. Enroll now at duke-energy.com/BudgetWinterBills.



Late payments are subject to a 5.0% late charge.

Please return this portion with your payment. Thank you for your business.



Duke Energy Return Mail
 PO Box 1090
 Charlotte, NC 28201-1090

Account number
9999 9999 9999

Amount of automatic draft

\$464.75
 by Jan 6

Your payment is scheduled to be made by monthly automatic draft on Jan 6

\$ _____ \$ _____

Add here, to help others with a contribution to Share the Light

Amount enclosed

SALLY SAMPLE
 125 SAMPLE STREET
 CITY, STATE 99999

Duke Energy Payment Processing
 PO Box 1094
 Charlotte, NC 28201-1094

889100979068490003300000000000000015992800001599285



We're here for you

Report an emergency

Electric/Gas outage		duke-energy.com/outages
	Electric	800.543.5599
	Gas	800.634.4300

Convenient ways to pay your bill

Online	duke-energy.com/billing
Automatically from your bank account	duke-energy.com/autodraft
Speedpay (fee applies)	duke-energy.com/pay-now 800.544.6900
By mail payable to Duke Energy	P.O. Box 1094 Charlotte, NC 28201-1094
In person	duke-energy.com/location

Help managing your account (not applicable for all customers)

Register for free paperless billing	duke-energy.com/paperless
Home	duke-energy.com/manage-home
Business	duke-energy.com/manage-business

Correspond with Duke Energy (not for payment)

P.O. Box 1326
Charlotte, NC 28201

General questions or concerns

Online	duke-energy.com
Home: Mon - Fri (7 a.m. to 7 p.m.)	800.544.6900
Business: Mon - Fri (7 a.m. to 6 p.m.)	800.774.1202
For hearing impaired TDD/TTY	800.222.3448 or 711
International	1.407.629.1010

Request the condensed or detailed bill format

Call (7a.m. to 7 p.m.)	800.544.6900
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Important to know

Your next meter reading: Jan 12

Please be sure we can safely access your meter for actual readings. Don't worry if your digital meter flashes eights from time to time. That's a normal part of the energy measuring process.

Your service(s) may be disconnected if your payment is past due

If payment for your service(s) is past due, we may begin disconnection procedures. If your service(s) is disconnected because of a missed payment, you must pay the amount specified in the **Important Disconnection Information** section on your bill, as well as a reconnection fee, before your service will be reconnected. The reconnection fee is \$5.88 for electric service that may be reconnected remotely, \$60 for electric service that is not eligible to be reconnected remotely, \$125 for electric service that was disconnected at the pole and \$90 for gas service. There is an additional fee of \$40 to reconnect electric service after normal business hours if not eligible to be reconnected remotely. A security deposit may also be required.

Electric service does not depend on payment for other products or services

Non-payment for non-regulated products or services (such as surge protection or equipment service contracts) may result in removal from the program but will not result in disconnection of electric service.

When you pay by check

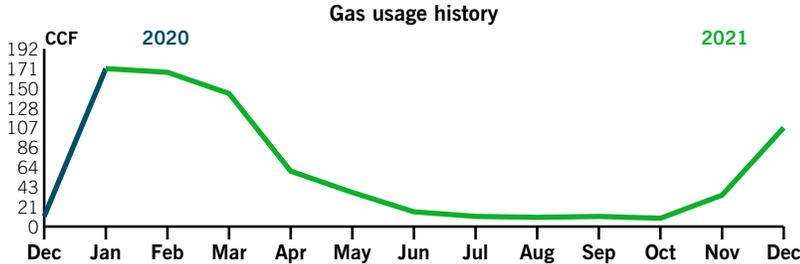
We may process the payment as a regular check or convert it into a one-time electronic check payment.

Para nuestros clientes que hablan Español

Representantes bilingües están disponibles para asistirle de lunes a viernes de 7 a.m. - 7 p.m. Para obtener más información o reportar problemas con su servicio eléctrico, favor de llamar al 800.544.6900.



Your usage snapshot - Continued



Average temperature in degrees

35° 33° 29° 47° 52° 60° 72° 74° 75° 68° 61° 42° 43°

	Current Month	Dec 2020	12-Month Usage	Avg Monthly Usage
Gas (CCF)	107	11	777	65
12-month usage based on most recent history				

Current electric usage for meter number 320376219

Actual reading on Dec 9 61511
 Previous reading on Nov 4 - 48971

Energy used 2,540 kWh

Energy Delivered

Actual reading on Dec 9 3
 Previous reading on Nov 4 - 0

Energy delivered to grid 43 kWh

Billed kWh 2,497.000 kWh



A kilowatt hour (kWh) is a measure of the energy used by a 1,000-watt appliance in one hour. A 10-watt LED lightbulb would take 100 hours to use 1 kWh.

Current Gas usage for meter number 056529

Actual reading on Dec 9 2430
 Previous reading on Nov 9 - 2323

Gas used 107 CCF

Billed CCF 107.000 CCF



One centum cubic foot (CCF) is the amount of gas in a 100-cubic-foot space. If you have a standard oven, it would take about 20 hours to use 1 CCF of gas.

Billing details - Electric

Billing Period - Nov 04 to Dec 09

Meter - 999999999

Customer Charge	\$15.48
Energy Charge	
2,497.000 kWh @ \$0.08099500	202.24
Demand Side Management Cost Recovery Program Rider (DSM)	
2,497.000 kWh @ \$0.00217500	5.43
Off-System Sales Profit Sharing Mechanism Rider (PSM)	
2,497.000 kWh @ \$-0.00082700	-2.07
Electric Fuel Adjustment	

Your current rate is Residential Service (RS).

For a complete listing of all Kentucky rates and riders, visit duke-energy.com/rates



Page 4 of 4
 Account number **9999 9999 9999**

Billing details - Electric continued

2,497.000 kWh @ \$0.02506800	\$62.59
Environmental Surcharge Mechanism Rider (ESM)	8.84
Total Current Charges	\$292.51

Billing details - Gas

Billing Period - Nov 09 to Dec 09	
Meter - 9999999	
Customer Charge	\$16.80
Gas Delivery Charge	
107.000 CCF @ \$0.46920000	50.20
Gas DSM Rider	
107.000 CCF @ \$0.04581700	4.90
Gas Cost Recovery	
107.000 CCF @ \$0.72670000	77.76
Gas WNA Rider	
107.000 CCF @ \$0.00930223	1.00
Total Current Charges	\$151.56

Your current rate is Residential Service (RS).

For a complete listing of all Kentucky rates and riders, visit duke-energy.com/rates

Billing details - Taxes

Franchise Fee	21.58
Total Taxes	\$21.58

SAMPLE BILL

Duke Energy Kentucky
Case No. 2021-00324
STAFF Second Set Data Requests
Date Received: January 18, 2022

CONFIDENTIAL STAFF-DR-02-003
(As to Attachments 2(a)-(i) only)

REQUEST:

Refer to Duke Kentucky's response to Commission Staff's First Request for Information, Item 1.e. Provide the manual calculation for Mr. Oka's account from March 2020 through the most current billing month. Provide all supporting calculations and documentation in Excel spreadsheet format with all formulas, columns, and rows unprotected and fully accessible.

RESPONSE:

CONFIDENTIAL PROPRIETARY TRADE SECRET
(As to Attachments 2(a)-(i) only)

From March 2020-April 2021 the account was not manually calculated, the account was billed through the billing system. Billing changed the reads for the account to bill and for those months the customer was billed for zero usage. Please see STAFF-DR-02-003 Attachment 1 for the monthly tracking sheet of the meter reads and STAFF-DR-02-003 Confidential Attachments 2(a) – (i) for the calculation sheets for April 2021-present. In STAFF-DR-02-003 Confidential Attachments 2(a) – (i), there are two tabs and the calculations tab is ULH&P Electric Calc, the net metering calculations are in columns AA-AD, the tax adjustment information is in columns AT-AX.

PERSON RESPONSIBLE: Abigail Johnson

**STAFF-DR-02-003 CONFIDENTIAL
ATTACHMENTS 2(a) – (i)**

BEING FILED UNDER SEAL