



139 East Fourth Street  
1303-Main  
Cincinnati, Ohio 45202

o: 513-287-4010  
f: 513-370-5720

Larisa.Vaysman@duke-energy.com  
Larisa M. Vaysman  
Associate General Counsel

**VIA ELECTRONIC FILING**

April 12, 2024

Ms. Linda Bridwell  
Executive Director  
Kentucky Public Service Commission  
211 Sower Boulevard  
Frankfort, Kentucky 40602-0615

Re: Case No. 2022-00289  
In the Matter of: Elizabeth L. Eichelberger v. Duke Energy Kentucky, Inc.

Dear Ms. Bridwell:

Duke Energy Kentucky, Inc. hereby submits its Responses to Staff's Fifth Request for Information. I certify that the electronic documents are true and accurate copies of the original documents.

I certify that the electronically filed documents are true and accurate copies of the original documents and that there are currently no parties in this proceeding that the Commission has excused from participation by electronic means. Pursuant to the Commission's July 22, 2021 Order in Case No. 2020-00085, no paper copies of this filing will be made.

Respectfully submitted,

/s/Larisa M. Vaysman

Larisa M. Vaysman (98944)  
Associate General Counsel  
Duke Energy Business Services LLC  
139 East Fourth Street, 1303-Main  
Cincinnati, Ohio 45202  
Phone: (513) 287-4010  
Fax: (513) 370-5720  
E-mail: larisa.vaysman@duke-energy.com  
*Counsel for Duke Energy Kentucky, Inc.*

Enclosures: As stated

RECEIVED

APR 12 2024

PUBLIC SERVICE  
COMMISSION

VERIFICATION

STATE OF NORTH CAROLINA )  
 )  
COUNTY OF ~~MECKLENBURG~~<sup>81</sup> ) SS:  
 Lincoln )

The undersigned, Tara Bolen, Manager Products & Services, being duly sworn, deposes and says that she has personal knowledge of the matters set forth in the foregoing data requests, and that the answers contained therein are true and correct to the best of her knowledge, information and belief.

Tara Bolen  
Tara Bolen, Affiant

Subscribed and sworn to before me by Tara Bolen on this 4<sup>th</sup> day of April, 2024.

Sheila Lemoine  
NOTARY PUBLIC



My Commission Expires: July 21, 2024

**KyPSC Case No. 2022-00289**  
**TABLE OF CONTENTS**

| <b><u>DATA REQUEST</u></b> | <b><u>WITNESS</u></b> | <b><u>TAB NO.</u></b> |
|----------------------------|-----------------------|-----------------------|
| STAFF-DR-05-001            | Tara Bolen .....      | 1                     |
| STAFF-DR-05-002            | Tara Bolen .....      | 2                     |
| STAFF-DR-05-003            | Tara Bolen .....      | 3                     |
| STAFF-DR-05-004            | Tara Bolen .....      | 4                     |
| STAFF-DR-05-005            | Tara Bolen .....      | 5                     |

**Duke Energy Kentucky**  
**Case No. 2022-00289**  
**STAFF Fifth Set Data Requests**  
**Date Received: March 22, 2024**

**STAFF-DR-05-001**

**REQUEST:**

Refer to Ky. P.S.C. Gas No. 2, Seventh Revised Sheet No. 25 (issued October 27, 2023), effective October 13, 2023.

a. State whether Duke Kentucky applied its current gas tariff Annual Budget Billing language to all affected customer accounts (1) immediately by changing, (2) only upon regularly scheduled annual settle-up, or (3) upon quarterly review.

b. State how many gas budget billing customers, if any, had their budget billing amounts changed prior to their regularly scheduled annual settle-up after the current gas tariff Annual Budget Billing language took effect on January 4, 2022.

**RESPONSE:**

a. Upon the implementation of Customer Connect in April 2022, Duke Energy Kentucky applied its gas tariff Annual Budget Billing language to all customers enrolled in the program upon their next scheduled quarterly review.

b. 6,535 Annual Budget Billing gas accounts have had their budget billing amount changed prior to their annual settle-up from the implementation of Customer Connect in April 2022 to April 3, 2024. These accounts may also have electric service which may have a budget bill plan.

**PERSON RESPONSIBLE:** Tara Bolen

**Duke Energy Kentucky**  
**Case No. 2022-00289**  
**STAFF Fifth Set Data Requests**  
**Date Received: March 22, 2024**

**STAFF-DR-05-002**

**REQUEST:**

Refer to Duke Kentucky's Response to Commission Staff's Fourth Request for Information (Staff's Fourth Request), Item 3, Attachment.

a. State why Duke Kentucky began making quarterly changes to Ms. Eichelberger's gas bills in October 2022.

b. State how many gas budget billing customers received quarterly changes within the first year after the current gas tariff took effect on January 4, 2022.

c. State why Duke Kentucky began making quarterly changes to Ms. Eichelberger's electric bills in October 2022.

d. State how many electric budget billing customers received unrequested quarterly changes since 2018.

**RESPONSE:**

a. In October 2022, as part of a quarterly review of Mr. Eichelberger's budget billing amount, the gas budget bill amount exceeded the actual gas bill amounts based on a Company set threshold. The quarterly reviews were designed to help customers not end the Annual Plan period with a large balance or credit on their settle-up month.

b. 2,952 Annual Budget Billing gas accounts became subject to quarterly reviews in April 2022. This number includes both accounts that were already enrolled prior to January 2022 and accounts which first enrolled in the Annual Budget Billing plan after January 2022. These accounts may also have electric service which may have a budget bill plan.

Prior to the implementation of Customer Connect in April 2022, the Annual Budget Billing program did not conduct quarterly reviews.

c. In October 2022, as part of a quarterly review of Mr. Eichelberger's electric budget billing amount, the electric budget bill amount exceeded the actual electric bill amounts based on a Company set threshold. The quarterly reviews were designed to help customers not end the Annual Plan period with a large balance or credit on their settle-up month.

d. 7,767 Annual Budget Billing electric accounts became subject to quarterly reviews in 2022. This number includes both accounts that were already enrolled prior to April 2022 and accounts which first enrolled in the Annual Budget Billing plan after April 2022. These accounts may also have gas service which may have a budget bill plan.

Prior to the implementation of Customer Connect in April 2022, the Annual Budget Billing program did not conduct quarterly reviews.

**PERSON RESPONSIBLE:** Tara Bolen

**Duke Energy Kentucky  
Case No. 2022-00289  
STAFF Fifth Set Data Requests  
Date Received: March 22, 2024**

**STAFF-DR-05-003**

**REQUEST:**

State whether Duke Kentucky currently divides gas annual budget billing customer usage by 12 or 11 when calculating bills and state when this practice began.

**RESPONSE:**

Duke Energy Kentucky currently calculates the gas Annual Budget Billing amount by using 12 months of customer's usage, dividing the usage by 12, and using the result to calculate the bill.

**PERSON RESPONSIBLE:** Tara Bolen

**Duke Energy Kentucky  
Case No. 2022-00289  
STAFF Fifth Set Data Requests  
Date Received: March 22, 2024**

**STAFF-DR-05-004**

**REQUEST:**

State whether Duke Kentucky currently divides electric annual budget billing customer usage by 12 or 11 when calculating bills and state when this practice began.

**RESPONSE:**

Duke Energy Kentucky currently calculates the electric Annual Budget Billing amount by using 12 months of customer's usage, dividing the usage by 12, and using the result to calculate the bill. With the implementation of Customer Connect, the Company filed a Budget Billing tariff update for the Duke Energy Kentucky Gas Budget Billing Annual Plan, however, the Company inadvertently failed to file a concomitant update to the Kentucky Electric Budget Billing Annual Plan. The Company will correct this oversight with a tariff update to the Electric Budget Billing Annual Plan.

**PERSON RESPONSIBLE:** Tara Bolen

**Duke Energy Kentucky**  
**Case No. 2022-00289**  
**STAFF Fifth Set Data Requests**  
**Date Received: March 22, 2024**

**STAFF-DR-05-005**

**REQUEST:**

Refer to Duke Kentucky's Response to Staff's Fourth Request, Item 2(b).

- a. State when Duke Kentucky began calculating gas budget bills as (12 months of monthly usage x rate at time of billing)/11 or 12 month divisor.
- b. State how many gas budget billing customers have been affected by this change.
- c. State when Duke Kentucky began calculating electric budget bills as (12 months of monthly usage x rate at time of billing)/11 or 12 month divisor.
- d. State how many electric budget billing customers have been affected by this change.

**RESPONSE:**

- a. Upon the implementation of Customer Connect in April 2022, Duke Energy Kentucky began calculating the gas Annual Budget Billing amount by using 12 months of customer's usage, dividing the usage by 12 for all customers enrolled in the program.
- b. All gas Annual Budget Billing Customers bills began utilizing the calculation stated above upon the implementation of Customer Connect in April 2022. As of April 3, 2024, 1,125 gas service only accounts and 5,107 accounts with both gas and electric service are enrolled in Annual Budget Billing.
- c. Upon the implementation of Customer Connect in April 2022, Duke Energy Kentucky began calculating the electric Annual Budget Billing amount by using 12 months of customer's usage, dividing the usage by 12 for all customers enrolled in the program.

d. All electric Annual Budget Billing Customers bills began utilizing the calculation stated above upon the implementation of Customer Connect in April 2022. As of April 3, 2024, 2,295 electric service only accounts and 5,107 accounts with both gas and electric service are enrolled in Annual Budget Billing.

**PERSON RESPONSIBLE:** Tara Bolen