

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF DUKE ENERGY)	
KENTUCKY, INC. FOR (1) AN ADJUSTMENT OF)	
ELECTRIC RATES; (2) APPROVAL OF NEW)	CASE NO.
TARIFFS; (3) APPROVAL OF ACCOUNTING)	2022-00372
PRACTICES TO ESTABLISH REGULATORY)	
ASSETS AND LIABILITIES; AND (4) ALL OTHER)	
REQUIRED APPROVALS AND RELIEF)	

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

Duke Energy Kentucky, Inc. (Duke Kentucky), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due on December 22, 2023. The Commission directs Duke Kentucky to the Commission's July 22, 2021 Order in Case No. 2020-00085¹ regarding filings with the Commission. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the question to which the response is made and 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

¹ Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC July 22, 2021), Order (in which the Commission ordered that for case filings made on and after March 16, 2020, filers are NOT required to file the original physical copies of the filings required by 807 KAR 5:001, Section 8).

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 or incomplete when made or, though correct or complete when made, is now incorrect or incomplete 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 and scanned 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 the Petition for Rehearing, page 8, in which Duke Kentucky states that in order to offer Rate RS-TOU-CPP without the waiver from 807 KAR 5:006, Section 7(1)(a)(3), the billing system will need to undergo significant redesign and reprogramming.

a. Given that Duke Kentucky's billing system should already have the ability to include the beginning and ending meter readings on customer bills, explain why it is not already possible to display the beginning and ending meter readings along with the usage during the relevant billing periods on bills of customers served under Rate RS-TOU-CPP.

b. Provide a detailed explanation of the redesign and reprogramming that must occur in order to be able to include the beginning and ending meter readings on bills of customers served under Rate RS-TOU-CPP.

2. Refer to the Petition for Rehearing, page 9, in which Duke Kentucky cites to the Direct Testimony of Bruce L. Sailers, page 18, where Mr. Sailers stated that customer bills will continue to provide information regarding usage that occurred during relevant billing periods and that customers will still be able to access the beginning and ending meter reading information via Duke Kentucky's website.

a. Provide a sample bill showing how usage information will be displayed if the Commission were to approve the requested waiver from 807 KAR 5:006, Section 7(1)(a)(3) for customers served under Tariff RS-TOU-CPP.

b. Provide screenshots of Duke Kentucky's website showing how the beginning and ending meter reading information will be displayed on the website for customers served under Tariff RS-TOU-CPP.

3. Refer to the Petition for Rehearing, page 20.

a. Provide the calculation of Duke Kentucky's proposed revenue requirement increase of \$0.141 million in Excel spreadsheet format, with all formulas, columns, and rows unprotected and fully accessible.

b. Provide the test-year depreciation expense related to decommissioning costs for solar energy generation facilities. Provide all supporting calculations and documentation in Excel spreadsheet format, with all formulas, columns, and rows unprotected and fully accessible.

c. Provide the rate base impact, including accumulated depreciation and accumulated deferred income taxes, of increasing depreciation rates to include decommissioning costs for solar energy generation facilities. Provide all supporting calculations and documentation in Excel spreadsheet format, with all formulas, columns, and rows unprotected and fully accessible.

4. Refer to the Petition for Rehearing, pages 21–22. Provide the actual expenses for outside counsel fees to assist with the production of post-hearing data requests, preparation and filing of post-hearing briefs, and review of intervenor brief.

5. Refer to the Petition for Rehearing, pages 2-3, in which Duke Kentucky states that the rates prescribed in Appendix B of the Commission’s October 12, 2023 final Order may have included the roll in the of Environmental Surcharge Mechanism Rider (ESM Rider). Provide the responses in Excel spreadsheet format with all formulas, columns, and rows unprotected and fully accessible.

a. Provide an updated version of Schedule M using the revenue requirement total ordered by the Commission in its October 12, 2023 final Order without the roll in of the ESM Rider, including the Duke Kentucky’s proposed rates using the approved revenue requirement

b. Provide a version of Schedule M using the revenue requirement total as adjusted using the terms of the rehearing as being petition by Duke Kentucky without

the roll in of the ESM Rider, including the Duke Kentucky's proposed rates using the approved revenue requirement.

6. Refer to the Petition for Rehearing, page 26. Provide in an Excel spreadsheet format with all formulas, columns, and rows unprotected and fully accessible a version of Attachment BLS-2 using the changes to the weighted cost in capital ordered by the Commission in its October 12, 2023 final Order.

7. Refer to the Petition for Rehearing, page 4.

- a. Provide the number of Kroger fee free payment locations;
- b. Provide the address for each location; and
- c. Provide the contract or written document memorializing the

agreement regarding payment locations between Kroger and Duke Kentucky.



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DATED DEC 05 2023

cc: Parties of Record

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