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**VIA EMAIL FILING**

August 9, 2023

Ms. Linda Bridwell  
Executive Director  
Kentucky Public Service Commission  
211 Sower Blvd  
Frankfort, KY 40601

RECEIVED

AUG 09 2023

PUBLIC SERVICE  
COMMISSION

**Re: Case No.2022-00435**

In the Matter of: Jeane Cole v. Duke Energy Kentucky, Inc.

Dear Ms. Bridwell:

Duke Energy Kentucky, Inc. hereby submits its Response to Commission Staff's First Request for Information electronically pursuant to 807 KAR 5:001. I certify that the electronic documents are true and accurate copies of the original documents.

The Company will retain the original filing in paper medium as the requirement to file it with the Commission was permanently granted a deviation in Case No. 2020-00085.

Respectfully submitted,

/s/ Rocco D'Ascenzo

Rocco D'Ascenzo (92796)

Deputy General Counsel

Duke Energy Kentucky, Inc.

139 East Fourth Street, 1313 Main

Cincinnati, Ohio 45201-0960

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Rocco.D'ascenzo@duke-energy.com

Counsel for Duke Energy Kentucky, Inc.

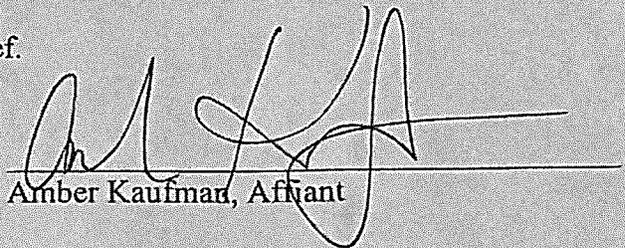
Enclosures: As stated

VERIFICATION

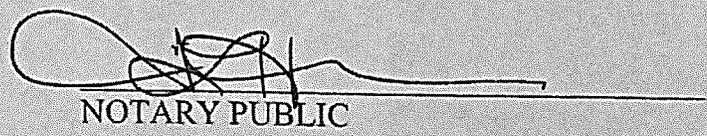
STATE OF INDIANA  
COUNTY OF PUTNAM

)  
) SS:  
)

The undersigned, Amber Kaufman, Consumer Affairs Specialist, being duly sworn, deposes and says that he 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 his knowledge, information and belief.

  
Amber Kaufman, Affiant

Subscribed and sworn to before me by Amber Kaufman on this 4<sup>th</sup> day of AUGUST, 2023.

  
NOTARY PUBLIC

NOTARY PUBLIC - STATE OF INDIANA  
SEAL  
TAMMY L HUDELSON  
COMMISSION NUMBER 709850  
MY COMMISSION EXPIRES FEBRUARY 8, 2026

My Commission Expires: FEB 8, 2026



VERIFICATION

STATE OF NORTH CAROLINA )  
 )  
COUNTY OF MECKLENBURG ) SS:

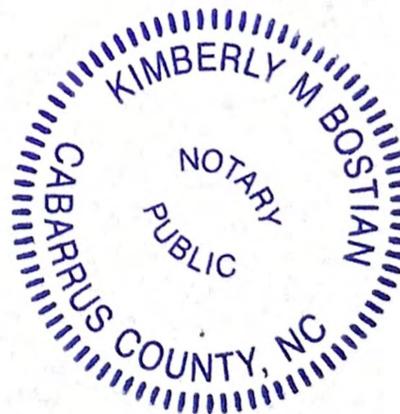
The undersigned, Beth White, GM Customer Billing, being duly sworn, deposes and says that he has personal knowledge of the matters set forth in the foregoing data requests, and that the answers contained therein are true and correct to the best of his knowledge, information and belief.

Beth White  
Beth White, Affiant

Subscribed and sworn to before me by Beth White on this 31 day of July, 2023.

Kimberly M Boston  
NOTARY PUBLIC

My Commission Expires: 11-9-24



**KyPSC Case No. 2022-00435**  
**TABLE OF CONTENTS**

<b><u>DATA REQUEST</u></b>	<b><u>WITNESS</u></b>	<b><u>TAB NO.</u></b>
STAFF-DR-01-001	Amber Kaufman .....	1
STAFF-DR-01-002	Joe Vale Beth White .....	2
STAFF-DR-01-003	Joe Vale Beth White .....	3
STAFF-DR-01-004	Amber Kaufman .....	4
STAFF-DR-01-005	Joe Vale Beth White .....	5
STAFF-DR-01-006	Joe Vale Beth White .....	6
STAFF-DR-01-007	Joe Vale Beth White .....	7
STAFF-DR-01-008	Joe Vale Beth White .....	8
STAFF-DR-01-009	Joe Vale Beth White .....	9
STAFF-DR-01-010	Joe Vale Beth White .....	10
STAFF-DR-01-011	Joe Vale .....	11
STAFF-DR-01-012	Joe Vale .....	12
STAFF-DR-01-013	Beth White .....	13

STAFF-DR-01-014	Beth White .....	14
STAFF-DR-01-015	Beth White .....	15
STAFF-DR-01-016	Joe Vale Beth White .....	16
STAFF-DR-01-017	Beth White .....	17
STAFF-DR-01-018	Amber Kaufman .....	18
STAFF-DR-01-019	Beth White .....	19
STAFF-DR-01-020	Beth White .....	20

**Duke Energy Kentucky  
Case No. 2022-00435  
STAFF First Set Data Requests  
Date Received: July 20, 2023**

**STAFF-DR-01-001**

**REQUEST:**

State the date that Duke Kentucky noticed the natural gas meter readings were not being communicated remotely for meter 1183200.

**RESPONSE:**

On April 14, 2022, the communication issue was discovered when a non-reading meter exception indicated that the module associated with meter 1183200 was not communicating.

**PERSON RESPONSIBLE:** Amber Kaufman

**Duke Energy Kentucky  
Case No. 2022-00435  
STAFF First Set Data Requests  
Date Received: July 20, 2023**

**STAFF-DR-01-002**

**REQUEST:**

Explain the reason(s) that meter 1183200 was not communicating remotely and how that was determined.

**RESPONSE:**

On April 14, 2022, it was discovered when a non-reading meter exception indicated that the module associated with meter 1183200 was not communicating. A typical reason for a module failing to communicate is the module not being able to establish a connection to the AMI field network. The Company corrected the module communication issue on April 21, 2022. The module remained unassociated with the customer's account until June 19, 2022, which was when the usage became associated to the customer's account and began being recorded in the customer information system. This is reflected in the Customer's July 2022 bill, the first billing cycle following the correction of the unassociated module/account issue.

**PERSON RESPONSIBLE:** Joe Vale  
Beth White

**Duke Energy Kentucky  
Case No. 2022-00435  
STAFF First Set Data Requests  
Date Received: July 20, 2023**

**STAFF-DR-01-003**

**REQUEST:**

State the specific steps that Duke Kentucky took when it first noticed that meter 1183200 was not communicating remotely.

**RESPONSE:**

An investigation order was created on 4/14/22, and on 4/21/22 a technician visited the premises and performed troubleshooting steps and the module started to communicate. It was not discovered that the module was still unassociated/ not-linked with the customer's account for billing purposes. That did not occur until June 19, 2022.

**PERSON RESPONSIBLE:** Joe Vale  
Beth White

**Duke Energy Kentucky  
Case No. 2022-00435  
STAFF First Set Data Requests  
Date Received: July 20, 2023**

**STAFF-DR-01-004**

**REQUEST:**

Provide an hourly breakdown in gas usage for the months from March 2022 through August 2022.

**RESPONSE:**

Hourly gas usage is not obtainable for gas services. Gas meters provide a meter reading once each day. Please refer to Attachment Staff DR-01-004 which provides the daily meter readings from the meter for the time period requested from March 2022 through August 2022. The actual daily meter readings began to be recorded on 6/19/22 once the module became associated with the customer's account. The customer's July 18, 2022 bill used actual reading data. There are no actual daily/monthly reads separately recorded prior to 6/19/22 due to the module not being associated with the customer's account until that time. The meter's index, however, continued to register total usage over the period.

**PERSON RESPONSIBLE:** Amber Kaufman

Filters: Measuring Component ID 917333073515, Service Point ID 997867012538, Start Date/Time 05-30-2022 23:00:00, End Date/Time 08-31-2022 23:00:00, Days Prior to Latest Date/Time 600

Measurement Value 1	Additional Details	Measurement Date/Time	Reading Value
CCF, Scalar	CCF Stop Read		
0.16	786.12 Start Reading: 785.96, End Reading: 786.12, Condition: Regular	08-31-2022 1:00:00 EDT	786.12
0.28	785.96 Start Reading: 785.68, End Reading: 785.96, Condition: Regular	08-30-2022 1:00:00 EDT	785.96
0.2	785.68 Start Reading: 785.48, End Reading: 785.68, Condition: Regular	08-29-2022 1:00:00 EDT	785.68
0.32	785.48 Start Reading: 785.16, End Reading: 785.48, Condition: Regular	08-28-2022 1:00:00 EDT	785.48
0.16	785.16 Start Reading: 785, End Reading: 785.16, Condition: Regular	08-27-2022 1:00:00 EDT	785.16
0.24	785 Start Reading: 784.76, End Reading: 785, Condition: Regular	08-26-2022 1:00:00 EDT	785
0.22	784.76 Start Reading: 784.54, End Reading: 784.76, Condition: Regular	08-25-2022 1:00:00 EDT	784.76
0.28	784.54 Start Reading: 784.26, End Reading: 784.54, Condition: Regular	08-24-2022 1:00:00 EDT	784.54
0.18	784.26 Start Reading: 784.08, End Reading: 784.26, Condition: Regular	08-23-2022 1:00:00 EDT	784.26
0.312	784.08 Start Reading: 783.768, End Reading: 784.08, Condition: Regular	08-22-2022 1:00:00 EDT	784.08
0.288	783.768 Start Reading: 783.480000, End Reading: 783.768000, Condition: Proration	08-21-2022 0:00:00 EDT	783.768
0.28	783.48 Start Reading: 783.2, End Reading: 783.48, Condition: Regular	08-20-2022 1:00:00 EDT	783.48
0.281	783.2 Start Reading: 782.919, End Reading: 783.2, Condition: Regular	08-19-2022 1:00:00 EDT	783.2
0.259	782.919 Start Reading: 782.660000, End Reading: 782.919000, Condition: Proration	08-18-2022 0:00:00 EDT	782.919
0.3	782.66 Start Reading: 782.36, End Reading: 782.66, Condition: Regular	08-17-2022 1:00:00 EDT	782.66
0.2	782.36 Start Reading: 782.16, End Reading: 782.36, Condition: Regular	08-16-2022 1:00:00 EDT	782.36
0.26	782.16 Start Reading: 781.9, End Reading: 782.16, Condition: Regular	08-15-2022 1:00:00 EDT	782.16
0.26	781.9 Start Reading: 781.64, End Reading: 781.9, Condition: Regular	08-14-2022 1:00:00 EDT	781.9
0.16	781.64 Start Reading: 781.48, End Reading: 781.64, Condition: Regular	08-13-2022 1:00:00 EDT	781.64
0.44	781.48 Start Reading: 781.04, End Reading: 781.48, Condition: Regular	08-12-2022 1:00:00 EDT	781.48
0.22	781.04 Start Reading: 780.82, End Reading: 781.04, Condition: Regular	08-11-2022 1:00:00 EDT	781.04
0.42	780.82 Start Reading: 780.4, End Reading: 780.82, Condition: Regular	08-10-2022 1:00:00 EDT	780.82
0.12	780.4 Start Reading: 780.28, End Reading: 780.4, Condition: Regular	08-09-2022 1:00:00 EDT	780.4
0.3	780.28 Start Reading: 779.98, End Reading: 780.28, Condition: Regular	08-08-2022 1:00:00 EDT	780.28
0.18	779.98 Start Reading: 779.8, End Reading: 779.98, Condition: Regular	08-07-2022 1:00:00 EDT	779.98
0.22	779.8 Start Reading: 779.58, End Reading: 779.8, Condition: Regular	08-06-2022 1:00:00 EDT	779.8
0.3	779.58 Start Reading: 779.28, End Reading: 779.58, Condition: Regular	08-05-2022 1:00:00 EDT	779.58
0.18	779.28 Start Reading: 779.1, End Reading: 779.28, Condition: Regular	08-04-2022 1:00:00 EDT	779.28
0.2	779.1 Start Reading: 778.9, End Reading: 779.1, Condition: Regular	08-03-2022 1:00:00 EDT	779.1
0.36	778.9 Start Reading: 778.54, End Reading: 778.9, Condition: Regular	08-02-2022 1:00:00 EDT	778.9
0.42	778.54 Start Reading: 778.12, End Reading: 778.54, Condition: Regular	08-01-2022 1:00:00 EDT	778.54
0.3	778.12 Start Reading: 777.82, End Reading: 778.12, Condition: Regular	07-31-2022 1:00:00 EDT	778.12
0.28	777.82 Start Reading: 777.54, End Reading: 777.82, Condition: Regular	07-30-2022 1:00:00 EDT	777.82
0.2	777.54 Start Reading: 777.34, End Reading: 777.54, Condition: Regular	07-29-2022 1:00:00 EDT	777.54
0.38	777.34 Start Reading: 776.96, End Reading: 777.34, Condition: Regular	07-28-2022 1:00:00 EDT	777.34
0.38	776.96 Start Reading: 776.58, End Reading: 776.96, Condition: Regular	07-27-2022 1:00:00 EDT	776.96
0.28	776.58 Start Reading: 776.3, End Reading: 776.58, Condition: Regular	07-26-2022 1:00:00 EDT	776.58
0.292	776.3 Start Reading: 776.008, End Reading: 776.3, Condition: Regular	07-25-2022 1:00:00 EDT	776.3
0.268	776.008 Start Reading: 775.740000, End Reading: 776.008000, Condition: Proration	07-24-2022 0:00:00 EDT	776.008
0.22	775.74 Start Reading: 775.52, End Reading: 775.74, Condition: Regular	07-23-2022 1:00:00 EDT	775.74
0.28	775.52 Start Reading: 775.24, End Reading: 775.52, Condition: Regular	07-22-2022 1:00:00 EDT	775.52
0.34	775.24 Start Reading: 774.9, End Reading: 775.24, Condition: Regular	07-21-2022 1:00:00 EDT	775.24
0.4	774.9 Start Reading: 774.5, End Reading: 774.9, Condition: Regular	07-20-2022 1:00:00 EDT	774.9
0.38	774.5 Start Reading: 774.12, End Reading: 774.5, Condition: Regular	07-19-2022 1:00:00 EDT	774.5
0.2	774.12 Start Reading: 773.92, End Reading: 774.12, Condition: Regular	07-18-2022 1:00:00 EDT	774.12
0.3	773.92 Start Reading: 773.62, End Reading: 773.92, Condition: Regular	07-17-2022 1:00:00 EDT	773.92
0.261	773.881 Start Reading: 773.620000, End Reading: 773.881000, Condition: System Estimate - Do Not Use	07-17-2022 0:00:00 EDT	773.881
0.2	773.62 Start Reading: 773.42, End Reading: 773.62, Condition: Regular	07-16-2022 1:00:00 EDT	773.62
0.4	773.42 Start Reading: 773.02, End Reading: 773.42, Condition: Regular	07-15-2022 1:00:00 EDT	773.42
0.18	773.02 Start Reading: 772.84, End Reading: 773.02, Condition: Regular	07-14-2022 1:00:00 EDT	773.02
0.24	772.84 Start Reading: 772.6, End Reading: 772.84, Condition: Regular	07-13-2022 1:00:00 EDT	772.84
0.26	772.6 Start Reading: 772.34, End Reading: 772.6, Condition: Regular	07-12-2022 1:00:00 EDT	772.6
0.28	772.34 Start Reading: 772.06, End Reading: 772.34, Condition: Regular	07-11-2022 1:00:00 EDT	772.34
0.22	772.06 Start Reading: 771.84, End Reading: 772.06, Condition: Regular	07-10-2022 1:00:00 EDT	772.06
0.3	771.84 Start Reading: 771.54, End Reading: 771.84, Condition: Regular	07-09-2022 1:00:00 EDT	771.84
0.32	771.54 Start Reading: 771.22, End Reading: 771.54, Condition: Regular	07-08-2022 1:00:00 EDT	771.54
0.28	771.22 Start Reading: 770.94, End Reading: 771.22, Condition: Regular	07-07-2022 1:00:00 EDT	771.22
0.18	770.94 Start Reading: 770.76, End Reading: 770.94, Condition: Regular	07-06-2022 1:00:00 EDT	770.94
0.36	770.76 Start Reading: 770.4, End Reading: 770.76, Condition: Regular	07-05-2022 1:00:00 EDT	770.76
0.48	770.4 Start Reading: 769.92, End Reading: 770.4, Condition: Regular	07-04-2022 1:00:00 EDT	770.4
0.253	770.173 Start Reading: 769.920000, End Reading: 770.173000, Condition: System Estimate - Do Not Use	07-04-2022 0:00:00 EDT	770.173
0.28	769.92 Start Reading: 769.64, End Reading: 769.92, Condition: Regular	07-03-2022 1:00:00 EDT	769.92
0.249	769.889 Start Reading: 769.640000, End Reading: 769.889000, Condition: System Estimate - Do Not Use	07-03-2022 0:00:00 EDT	769.889
0.24	769.64 Start Reading: 769.4, End Reading: 769.64, Condition: Regular	07-02-2022 1:00:00 EDT	769.64
0.26	769.691 Start Reading: 769.431000, End Reading: 769.691000, Condition: System Estimate - Do Not Use	07-02-2022 0:00:00 EDT	769.691
0.22	769.4 Start Reading: 769.180000, End Reading: 769.400000, Condition: Proration	07-01-2022 0:00:00 EDT	769.4
0.28	769.18 Start Reading: 768.9, End Reading: 769.18, Condition: Regular	06-30-2022 1:00:00 EDT	769.18
0.34	768.9 Start Reading: 768.56, End Reading: 768.9, Condition: Regular	06-29-2022 1:00:00 EDT	768.9
0.292	768.56 Start Reading: 768.268, End Reading: 768.56, Condition: Regular	06-28-2022 1:00:00 EDT	768.56
0.268	768.268 Start Reading: 768.000000, End Reading: 768.268000, Condition: Proration	06-27-2022 0:00:00 EDT	768.268
0.3	768 Start Reading: 767.7, End Reading: 768, Condition: Regular	06-26-2022 1:00:00 EDT	768
0.2	767.7 Start Reading: 767.5, End Reading: 767.7, Condition: Regular	06-25-2022 1:00:00 EDT	767.7
0.24	767.5 Start Reading: 767.26, End Reading: 767.5, Condition: Regular	06-24-2022 1:00:00 EDT	767.5
0.281	767.26 Start Reading: 766.979, End Reading: 767.26, Condition: Regular	06-23-2022 1:00:00 EDT	767.26
0.637	767.357 Start Reading: 766.720000, End Reading: 767.357000, Condition: System Estimate - Do Not Use	06-23-2022 0:00:00 EDT	767.357
0.259	766.979 Start Reading: 766.720000, End Reading: 766.979000, Condition: Proration	06-22-2022 0:00:00 EDT	766.979
0.44	766.72 Start Reading: 766.28, End Reading: 766.72, Condition: Regular	06-21-2022 1:00:00 EDT	766.72
0.349	106.692 Start Reading: 106.343000, End Reading: 106.692000, Condition: System Estimate - Do Not Use	06-21-2022 0:00:00 EDT	106.692
0.22	766.28 Start Reading: 766.06, End Reading: 766.28, Condition: Regular	06-20-2022 1:00:00 EDT	766.28

0.379	106.343	Start Reading: 105.964000, End Reading: 106.343000, Condition: System Estimate - Do Not Use	06-20-2022 0:00:00 EDT	106.343
2.907	766.06	Start Reading: 763.153, End Reading: 766.06, Condition: Regular	06-19-2022 1:00:00 EDT	766.06
0.412	105.964	Start Reading: 105.520000, End Reading: 105.964000, Condition: System Estimate - Do Not Use	06-19-2022 0:00:00 EDT	105.964
2.79	763.153	Start Reading: 760.363000, End Reading: 763.153000, Condition: Proration	06-18-2022 0:00:00 EDT	763.153
2.791	760.363	Start Reading: 757.572000, End Reading: 760.363000, Condition: Proration	06-17-2022 0:00:00 EDT	760.363
2.79	757.572	Start Reading: 754.782000, End Reading: 757.572000, Condition: Proration	06-16-2022 0:00:00 EDT	757.572
2.791	754.782	Start Reading: 751.991000, End Reading: 754.782000, Condition: Proration	06-15-2022 0:00:00 EDT	754.782
2.79	751.991	Start Reading: 749.201000, End Reading: 751.991000, Condition: Proration	06-14-2022 0:00:00 EDT	751.991
2.791	749.201	Start Reading: 746.410000, End Reading: 749.201000, Condition: Proration	06-13-2022 0:00:00 EDT	749.201
2.79	746.41	Start Reading: 743.620000, End Reading: 746.410000, Condition: Proration	06-12-2022 0:00:00 EDT	746.41
2.791	743.62	Start Reading: 740.829000, End Reading: 743.620000, Condition: Proration	06-11-2022 0:00:00 EDT	743.62
2.79	740.829	Start Reading: 738.039000, End Reading: 740.829000, Condition: Proration	06-10-2022 0:00:00 EDT	740.829
2.791	738.039	Start Reading: 735.248000, End Reading: 738.039000, Condition: Proration	06-09-2022 0:00:00 EDT	738.039
2.79	735.248	Start Reading: 732.458000, End Reading: 735.248000, Condition: Proration	06-08-2022 0:00:00 EDT	735.248
2.791	732.458	Start Reading: 729.667000, End Reading: 732.458000, Condition: Proration	06-07-2022 0:00:00 EDT	732.458
2.79	729.667	Start Reading: 726.877000, End Reading: 729.667000, Condition: Proration	06-06-2022 0:00:00 EDT	729.667
2.791	726.877	Start Reading: 724.086000, End Reading: 726.877000, Condition: Proration	06-05-2022 0:00:00 EDT	726.877
2.79	724.086	Start Reading: 721.296000, End Reading: 724.086000, Condition: Proration	06-04-2022 0:00:00 EDT	724.086
2.791	721.296	Start Reading: 718.505000, End Reading: 721.296000, Condition: Proration	06-03-2022 0:00:00 EDT	721.296
2.79	718.505	Start Reading: 715.715000, End Reading: 718.505000, Condition: Proration	06-02-2022 0:00:00 EDT	718.505
2.791	715.715	Start Reading: 0, End Reading: 0, Condition: Proration	06-01-2022 0:00:00 EDT	715.715

**Duke Energy Kentucky  
Case No. 2022-00435  
STAFF First Set Data Requests  
Date Received: July 20, 2023**

**STAFF-DR-01-005**

**REQUEST:**

Explain whether the meter interface unit (MIU) for meter 1183200 malfunctioned.

**RESPONSE:**

Meter 1183200 itself did not malfunction. To the best of our knowledge, the meter index, that measures usage, was properly operating. The module that communicates that usage remotely to Duke Kentucky stopped communicating. This was likely due to the module not being able to establish a connection to the AMI field network. If a module is not communicating, the meter index will continue to measure usage correctly. The usage is just not communicated electronically back to the Company.

**PERSON RESPONSIBLE:** Joe Vale  
Beth White

**Duke Energy Kentucky  
Case No. 2022-00435  
STAFF First Set Data Requests  
Date Received: July 20, 2023**

**STAFF-DR-01-006**

**REQUEST:**

Explain whether a malfunctioning MIU can cause a false reading.

**RESPONSE:**

A malfunctioning communication module that stops communicating does not cause false readings. To the best of our knowledge, the meter index, that measures usage, was properly operating the entire time.

**PERSON RESPONSIBLE:** Joe Vale  
Beth White

**Duke Energy Kentucky  
Case No. 2022-00435  
STAFF First Set Data Requests  
Date Received: July 20, 2023**

**STAFF-DR-01-007**

**REQUEST:**

Explain in detail Duke Kentucky's process for when an MIU fails to read, including what specifically the meter reader does when an MIU fails.

**RESPONSE:**

After a gas communication module fails to communicate for six consecutive days, a field investigation order is typically created, and an investigator is dispatched to resolve the communication issue. Upon arrival, the field investigator performs the following steps: 1) Wakes up/resets the communication modules; and 2) Logs into the module to confirm that the module has established a viable communication path to the AMI field network. If communications cannot be established, the communications module will be changed.

**PERSON RESPONSIBLE:** Joe Vale  
Beth White

**Duke Energy Kentucky**  
**Case No. 2022-00435**  
**STAFF First Set Data Requests**  
**Date Received: July 20, 2023**

**STAFF-DR-01-008**

**REQUEST:**

Explain whether Duke Kentucky followed its own internal policies and procedures after learning that the MIU had malfunctioned and provide a copy of Duke Kentucky's policies and procedures for when an MIU malfunctions.

**RESPONSE:**

Duke Energy Kentucky did follow its process for creating a field investigation order after identifying that the installed module was not communicating. The Duke Energy Kentucky process for working a non-communicating gas module is as follows: 1) When a gas module does not communicate for 6 consecutive days, an exception is generated that goes to an AMI operator work queue; 2) AMI Operator performs analysis to determine if a module investigation order is needed or if an AMI field network mitigation order is needed; 3) When a gas module estimates, and the module is still not communicating, an escalation exception is generated that goes to an operator work queue; and 4) Operator performs a review of previous actions and determines follow-up action needed.

**PERSON RESPONSIBLE:** Joe Vale  
Beth White

**Duke Energy Kentucky  
Case No. 2022-00435  
STAFF First Set Data Requests  
Date Received: July 20, 2023**

**STAFF-DR-01-009**

**REQUEST:**

Explain whether Duke Kentucky made a visual reading off of the register when the MIU first failed. If so, provide the register reading(s). If not, explain what prevented Duke Kentucky from obtaining a visual reading off of the register.

**RESPONSE:**

Duke Energy Kentucky did not take a visual reading off of the register when the module was investigated in the field on 4/21/22. Nothing prevented Duke from obtaining a reading at that time. However, the investigation order was specifically created to resolve the communication issue and not to take a manual reading. When the communication issue is resolved, the module begins to remotely send in daily reads.

**PERSON RESPONSIBLE:** Joe Vale  
Beth White

**Duke Energy Kentucky  
Case No. 2022-00435  
STAFF First Set Data Requests  
Date Received: July 20, 2023**

**STAFF-DR-01-010**

**REQUEST:**

Explain whether it is Duke Kentucky's policy to test a meter when it malfunctions.

**RESPONSE:**

There was no malfunctioning meter in this case. We do not test a meter if the issue is the failure in communication. It is policy to test a gas meter upon removal of service. Meter 1087533 was not removed until the customer requested a new meter, and the meter 1087533 was sent to be tested for accuracy on 9/21/2021. Meter 1183200 was installed and has not been tested because it is still actively servicing the property and has not malfunctioned.

**PERSON RESPONSIBLE:** Joe Vale  
Beth White

**Duke Energy Kentucky  
Case No. 2022-00435  
STAFF First Set Data Requests  
Date Received: July 20, 2023**

**STAFF-DR-01-011**

**REQUEST:**

State whether it is accurate that meter 1183200 was not tested when it malfunctioned.

**RESPONSE:**

It was not necessary to test the current meter when the error was identified as a communication issue, as the meter itself did not malfunction.

**PERSON RESPONSIBLE:** Joe Vale

**Duke Energy Kentucky  
Case No. 2022-00435  
STAFF First Set Data Requests  
Date Received: July 20, 2023**

**STAFF-DR-01-012**

**REQUEST:**

State whether meter 1183200 has been tested to date, and if so, when.

**RESPONSE:**

The old meter (1087533) was tested after the customer requested a new meter. The meter was tested on 9/21/2021 after it was removed from service. There is no meter test for 1183200 because the meter has not been removed. (see question 11)

**PERSON RESPONSIBLE:** Joe Vale

**Duke Energy Kentucky  
Case No. 2022-00435  
STAFF First Set Data Requests  
Date Received: July 20, 2023**

**STAFF-DR-01-013**

**REQUEST:**

State whether the data log would notify Duke Kentucky of a meter malfunction during a billing cycle.

**RESPONSE:**

Both the meter data management (MDM) and CIS billing system (SAP) have usage and billing validations designed to identify suspect usage and charges and create an exception when a validation failure occurs. This exception is then routed to the appropriate back-office team for review before the bill is released to the customer. When a module fails to communicate for 6 consecutive days an exception is created. This exception is then routed to the AMI Operations Team to be worked.

**PERSON RESPONSIBLE:** Beth White

**Duke Energy Kentucky  
Case No. 2022-00435  
STAFF First Set Data Requests  
Date Received: July 20, 2023**

**STAFF-DR-01-014**

**REQUEST:**

State when and the manner in which Duke Kentucky first contacted Ms. Cole about her meter malfunctioning.

**RESPONSE:**

There was no meter malfunction. There was a module communication issue and an issue with the device ID of the communication module not being correctly associated to the customer's account in the CIS billing system (SAP). We indicated on her bills that estimated usage was used to calculate the bills.

**PERSON RESPONSIBLE:** Beth White

**Duke Energy Kentucky  
Case No. 2022-00435  
STAFF First Set Data Requests  
Date Received: July 20, 2023**

**STAFF-DR-01-015**

**REQUEST:**

Provide a copy of Duke Kentucky's notice to Ms. Cole regarding any deviation from historical gas usage, as required by Duke Kentucky's Fourth Revised Tariff Sheet No. 24, Section 5(3).

**RESPONSE:**

The meter module resumed communication in April 2022, however the device itself was not associated with the customer's account until June 19, 2022. At that time, the device ID of the communication module was correctly associated to the customer's account in the CIS billing system (SAP), and actual meter readings associated with the customer's account usage were communicated beginning June 19, 2022. Accordingly, an actual usage reading was obtained and provided to the CIS system on 7/18/2022 which was used for monthly billing purposes, and a Meter Reading Exceeds Tolerance exception was created. The performer's review of the exception prompted the correction of the previously estimated usage by using the actual reading to prorate the usage. The customer was notified by issuance of a corrected bill. This process does not deviate from Duke Kentucky's Fourth Revised Tariff Sheet No. 24, Section 5(3) which references 807 KAR 5:006, Section 11 (4) and (5). This tariff sheet indicates customer contact following a meter test. A meter test was not performed for Ms. Cole's meter since the issue was a communication issue and was not a meter failure.

**PERSON RESPONSIBLE:** Beth White

**Duke Energy Kentucky  
Case No. 2022-00435  
STAFF First Set Data Requests  
Date Received: July 20, 2023**

**STAFF-DR-01-016**

**REQUEST:**

Explain how and why Jeane Cole's natural gas meter readings were initially not being effectively linked in Duke Kentucky's customer information system to Ms. Cole's account during the period of March 2022 through July 2022.

**RESPONSE:**

For meter 1183200, that was installed on 9/17/21, the module did not start communicating after installation. Therefore, initially there was no read data coming in to link to the customer's account. On 4/21/22, a field investigation was performed, the module started to communicate, however, it was not registering as usage associated with the customer's account until June 19, 2022. Once the usage was linked to the customer's account it was recorded to the account and actual data was used to calculate the customer's bill with the July 18, 2022 bill.

**PERSON RESPONSIBLE:** Joe Vale  
Beth White

**Duke Energy Kentucky  
Case No. 2022-00435  
STAFF First Set Data Requests  
Date Received: July 20, 2023**

**STAFF-DR-01-017**

**REQUEST:**

Explain in detail how and when Duke Kentucky fixed the bad link to the customer information system.

**RESPONSE:**

Following the resolution of the communication issue as mentioned in question 16, the device ID of the communication module was updated in June, establishing the link to the customer's account for data to transfer from the meter to the customer information system.

**PERSON RESPONSIBLE:** Beth White

**Duke Energy Kentucky  
Case No. 2022-00435  
STAFF First Set Data Requests  
Date Received: July 20, 2023**

**STAFF-DR-01-018**

**REQUEST:**

State whether Duke Kentucky communicated to Ms. Cole about the issue with the bad link in Duke Kentucky's customer information system, and if so, when.

**RESPONSE:**

A bill message was included each month on Ms. Cole's bill to indicate the bill was estimated. "Your bill this month includes estimated usage and may be adjusted once the actual usage is obtained from the meter."

**PERSON RESPONSIBLE:** Amber Kaufman

**Duke Energy Kentucky**  
**Case No. 2022-00435**  
**STAFF First Set Data Requests**  
**Date Received: July 20, 2023**

**STAFF-DR-01-019**

**REQUEST:**

Explain in detail how Duke Kentucky estimated Ms. Cole's bills and provide any calculations made.

**RESPONSE:**

The criteria used to estimate usage consists of the following. If the information in the listed step is not available, the system moves on to the next step.

- a. Average ccf per day from same month previous year;
- b. Average ccf per day from previous bill month;
- c. If new service (none of the above exists), estimated usage is calculated based on the Energy Use Intensity (EUI) Score for the dwelling in conjunction with the square footage provided by the customer or based on the average usage of customers of the same type within the same zip code.

**PERSON RESPONSIBLE:** Beth White

**Duke Energy Kentucky**  
**Case No. 2022-00435**  
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**STAFF-DR-01-020**

**REQUEST:**

Refer to Duke Kentucky's Answer to the Complaint, paragraph 6, stating that after Duke Kentucky associated the gas meter to Ms. Cole's account, Duke Kentucky used actual meter reads to revise previously estimated meter reads for April 13, 2022, May 12, 2022, June 13, 2022, and July 14, 2022. Provide a description of the bill true-up process used in this case, including the related written policy or procedure for the true-up process used. Include the name of the person or persons who must approve the true-up.

**RESPONSE:**

Once actual usage was obtained from the meter for the July 18, 2022 billing, the previously estimated billing was cancelled, and the account was rebilled by prorating the July meter reading back to the previous actual meter reading and rebilling the usage.

**PERSON RESPONSIBLE:**           Beth White