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RECEIVED

OCT 20 2025

PUBLIC SERVICE
COMMISSION

October 16, 2025

Commonwealth of Kentucky
Public Service Commission
P O Box 615
Frankfort, KY 40602-0615

RE: In the Matter of: Stephanie Monette Smith vs. Duke Energy Kentucky, Inc.
Case No. 2025-00118

Dear Commissioners:

Enclosed please find a copy of the Complainant's First Request for Information to Duke Energy Kentucky, Inc. .

If you have any questions or concerns regarding this matter, please do not hesitate to contact me.

Sincerely,



Melissa R. Dixon, Esq.

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

STEPHANIE MONETTE SMITH)	
)	
COMPLAINANT)	
)	CASE NO.
V.)	2025-00118
)	
DUKE ENGERY KENTUCKY, INC.)	
)	
DEFENDANT)	

**COMPLAINANT'S FIRST REQUEST FOR INFORMATION
TO DUKE ENERGY KENTUCKY, INC.**

Duke Energy Kentucky, Inc. (Duke Kentucky), pursuant to 807 KAR 5:001 shall respond to the following Requests for Information. 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 of 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 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 copies 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. Provide detailed information regarding the calculation of the back charge applied to Ms. Smith's account on or about December 23, 2024. Your response should include the following:

- a. The methodology used to estimate Ms. Smith's utility usage for the period in question, including any formulas, historical data, or assumptions applied;
- b. The source of the estimated usage figures, including whether they were derived from prior actual readings, regional averages, or other benchmarks;

- c. The reason actual usage data was not available for the period in question, and any steps taken to obtain or verify actual meter readings; and
- d. A copy of any internal policies or procedures that govern the use of estimated billing and back charges.

2. Provide a detailed accounting of the back charge applied to Ms. Smith's account or about December 23, 2024, including, but not limited to, the following:

- a. A line-item breakdown of the total back charge, including the rate(s) applied, the estimated usage quantity, and any fees, adjustments, or taxes included;
- b. The specific billing periods covered by the back charge, with corresponding estimated usage amounts for each period;
- c. Any prior payments or credits applied to the account that relate the same billing periods;
- d. Documentation or internal records used to support the calculation of the back charge; and
- e. Any applicable policies or tariff provisions that authorize the use of estimated billing and retroactive charges.

3. For each meter reading that occurred between September 1, 2022, and April 1, 2024, provide the following information:

- a. The date and time of each meter reading, and whether the meter reading was conducted manually or remotely;

- b. The actual meter reading value recorded for each month, including beginning and ending readings;
- c. Any documentation or logs showing the meter reading activity, including technician notes or system-generated records;
- d. An explanation of any discrepancies between the recorded readings and the usage figures used to calculate the back charge;
- e. If the technician was unable to read the meter due to reason beyond Duke Kentucky's control, identify the date and time the attempt to read the meter was made and the reason the technician was unable to read the meter; and
- f. The name of each technician who conducted the meter reading and whether the technician was an employee of Duke Kentucky. If the technician was not an employee of Duke Kentucky, identify the company by which the technician was employed.

4. Provide a detailed explanation of the reason no investigation was conducted by Duke Energy into the reason the monthly reading of Ms. Smith's meter showed zero usage for the period between September 1, 2022, and April 1, 2024.

5. Pursuant to 807 KAR 5:006 Section 11(3), please provide the following information regarding your customer usage monitoring practices:

- a. Please submit the version(s) of your tariff in effect from September 1, 2022, to April 2, 2024, that outlines the procedures used to monitor customer usage on at least a quarterly basis.

- b. Describe the specific methods and criteria used to identify unusual deviations in customer usage. Include any thresholds, algorithms, or manual review processes employed.
 - c. State the dates Ms. Smith's account usage was reviewed for unusual deviations in customer usage for the period beginning September 1, 2022, and ending April 1, 2024.
 - d. What specific procedures outlined in your tariff were applied to Ms. Smith's account.
 - e. Please provide logs and/or records showing monitoring activity and any deviation alerts for Ms. Smith's account.
 - f. Were any deviations in Ms. Smith's usage detected prior to March 20, 2024? If so, was Ms. Smith contacted or was any investigation initiated. Please provide documentation regarding the investigation or any contact with Ms. Smith regarding the deviation in usage.
6. Pursuant to 807 KAR 5:006 Section 11(4), please provide the following information:
- a. State whether Duke Kentucky's monitoring procedures indicated that a usage investigation was necessary for Ms. Smith's account. Identify the specific data or event that triggered the investigation.
 - b. Was Ms. Smith's meter removed from service as part of the investigation. If so, state the date the meter was removed.

- c. Was Ms. Smith notified in writing within ten (10) days of the meter's removal that a usage investigation was being conducted. Please provide a copy of the written notice and indicate the date it was sent.
- d. On what date was the usage investigation completed? State whether Ms. Smith was notified in writing of the findings of the investigation within ten (10) days of its completion. Provide a copy of the written notice and indicate the date it was sent to Ms. Smith.
- e. Please provide all internal records, logs, or correspondence related to the initiation, conduct, and conclusion of the usage investigation for Ms. Smith's account.

7. Please state whether Ms. Smith was provided with written notice pursuant to 807 KAR Section 11(5). Provide a copy of the written notice and indicate the date it was sent to Ms. Smith.

8. Provide a detailed, itemized payment history of Ms. Smith's account for each billing cycle from August 1, 2022, through December 2024, including the following:

- a. Billing period start and end dates;
- b. Bill issue date;
- c. Total amount billed;
- d. Items charged (e.g., usage charges, service fees, taxes, late fees);
- e. Meter readings and usage data;
- f. Any adjustments, credits, or refunds applied; and

g. Payment due dates and status (paid/unpaid).

Respectfully submitted,


/s/ Melissa R. Dixon

Melissa R. Dixon (KBA 89817)

Legal Aid of the Bluegrass, Inc.

104 East 7th Street

Covington, KY 41011

Telephone: (859) 957-0722

Email: mdixon@lablaw.org

*Counsel for Complainant, Stephanie
Smith*

CERTIFICATE OF SERVICE

The foregoing Request for Information has been served as follows on the 16th day of October, 2025:

Via United States Mail:


Duke Energy Kentucky, Inc.
139 East Fourth Street
Cincinnati, OH 45202

Rocco O. D'Ascenzo
Duke Energy Kentucky, Inc.
139 East Fourth Street
Cincinnati, OH 45201

Sheena McGee Leach
Duke Energy Kentucky, Inc.
139 East Fourth Street
Cincinnati, OH 45201

Via Electronic Mail:

Larisa Vaysman
Duke Energy Kentucky, Inc.
139 East Fourth Street
Cincinnati, OH 45201



Melissa R. Dixon