



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 EMAIL: PSCED@ky.gov

March 31, 2026

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

RECEIVED

MAR 31 2026

**PUBLIC SERVICE
COMMISSION**

Re: Case No. 2025-00118
Stephanie Monette Smith v. Duke Energy Kentucky, Inc.

Dear Ms. Bridwell:

Duke Energy Kentucky, Inc. hereby submits electronically pursuant to 807 KAR 5:001, Section 8, supplemental responses to Complainant's First Request for Information, Items 1 and 5 and supplemental responses to Commission Staff's Second Request for Information, Item 5.

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

cc: Melissa R. Dixon (via email)

Duke Energy Kentucky
Case No. 2025-00118
COMPLAINANT First Request for Information
Date Received: October 16, 2025

SUPPLEMENTAL COMPLAINANT-DR-01-001

REQUEST:

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.

SUPPLEMENTAL RESPONSE:

- a. Ms. Smith's usage for the period of the cancel/rebill was based on her usage during the same months from the most recent available year.
- b. The source of the estimated usage figures were prior or subsequent actual readings for the same months of the year. On COMPLAINT-DR-01-001(a) Attachment, which depicts the estimated usage used for the backbill, the usages estimated in Rows 13 to 19 of the spreadsheet (April 18 to October 18, 2023, inclusive) are taken exactly from actual meter reads obtained after the meter was replaced with a properly

functioning meter on March 20, 2024. Rows 8 to 12 (November 16, 2023 to March 18, 2024, inclusive) reflect actual historical usage for those months from November 14, 2021 to March 17, 2022). Rows 20 through 24 also use this same actual data.

d. The Company's estimating methodology for backbilling and estimation is to use actual usage from the same premise and customer, whenever such is available, which in this case it was.

ORIGINAL RESPONSE:

a. Please see COMPLAINANT-DR-01-001(a) Attachment and part b below.

b. A human performer gathered data from what was previously recorded. For example, if the usage for the same month billed in SAP for prior or following year, the account would be billed for that usage. If there is no usage billed in SAP, then we get an average from kWh per day for surrounding months.

c. The meter was being read every month, but displaying zeros, which did not reflect the actual usage.

d. When the Company discovers that a customer has been incorrectly billed (not as part of a usage monitoring investigation), the Company's policy is to comply with KRS 278.225 regarding the duration of backbilling and to comply with 807 KAR 5:006, Section 11(2) regarding any adjustments.

PERSON RESPONSIBLE: As to supplemental response, Abigail Kappesser
As to original response, Kristi Stanifer

Duke Energy Kentucky
Case No. 2025-00118
COMPLAINANT First Request for Information
Date Received: October 16, 2025

SUPPLEMENTAL COMPLAINANT-DR-01-005

REQUEST:

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.

SUPPLEMENTAL RESPONSE:

a. N/A

b. Specifically, the billing system looks at the installation and checks the customer’s consumption for the same billing period of the previous year and the billing period immediately prior to the current one being evaluated. It then looks at the customer class (e.g., residential) and meter type and compares the deviation threshold to a corresponding table in the billing system. If the deviation in consumption is outside the threshold defined in that table, a BPEM is triggered. There are two different BPEM's that could be triggered: M021 - Current Reading Lower Than Previous Reading or M024 - Meter Reading Exceeds Maximum Tolerance.

c. Based on the coded system logic, the process described in (b) above was performed each month. The following BPEM’s were generated during the period of September 1, 2022, and ending April 1, 2024. The process described in (b) above generated only one of these BPEM’s, the earliest one on October 19, 2022 below.

03/19/2024	placed inv order to have tech look at meter per meter reading stating DISPLAY FROZEN	BPEM Case 1016573379	Trouble Code: Display Issue	Megan Northrup
03/18/2024	BPEM creation for skip/trouble code DISPLAY FROZEN	BPEM Case 1016573379	Trouble Code: Display Issue	RFC_UAC_P11
02/07/2023	released implausible read	BPEM Case 1009912147	Estimate Threshold Exceeded	Lauren Owens
01/20/2023	Sent letter for electric access. Created interaction record to please schedule electric read order customer calls.	BPEM Case 1009909910	Trouble Code: Meter Damaged	Monica Mathis
01/18/2023	BPEM creation for skip/trouble code METER SAYS RF OPTOUT	BPEM Case 1009909910	Trouble Code: Meter Damaged	RFC_CAWA_P11
10/21/2022	no test results received. RDB	BPEM Case 1008449716	Meter Test Results Received	Roger Beck
10/19/2022	M021 Case Number: 1008476852 Contract Account Number: 910102482087 Installation Number: 7008982962 -gas Installation Number: 7008846832 -electric Released Implausible dated 10/18/2022 under Device #108268903 Reversed Invoiced from 8/17/2022 to 9/18/2022 Corrected periodic read of 0 kwh dated 10/16/2022 via SAP Proration with MT of PR for device number 108268903 under register 3 Billed and Invoiced from 8/17/2022 to 10/18/2022	BPEM Case 1008476852	Current Reading Lower Than Previous Reading	Jeneva Real Ramos

d. Assuming the question refers to usage monitoring: based on the coded system logic, the process described in (b) above, which reflects the Company's usage monitoring, was performed each month.

e. See responses to (c) and (d) above. See also the Company's previously filed COMPLAINANT-DR-01-003(a) Attachment 1 and COMPLAINANT-DR-01-003(f) Attachment, the columns titled "Trouble Mssg." See also the Company's previously filed response to STAFF-DR-02-004 and COMPLAINANT-DR-01-005(c) Attachment.

f. Yes, there was one alert issued on October 19, 2022, pursuant to the process described in part (b) above, depicted below. Based on the available record below, it appears that a human performer reviewed the account manually and updated the usage for the two preceding bill periods to zero, based on what appeared to be an actual meter read of zero.

M021 Case Number: 1008476852 Contract Account Number: 91011482087 Installation Number: 7008982962 -gas Installation Number: 7008846832 -electric		
10/19/2022	Released Implausible dated 10/18/2022 under Device #108268903 Reversed Invoiced from 8/17/2022 to 9/16/2022 Corrected periodic read of 0 kwh dated 10/16/2022 via SAP Proration with MT of PR for device number 108268903 under register 3 Billed and Invoiced from 8/17/2022 to 10/18/2022	BPEM Case 1008476852 Current Reading Lower Than Previous Reading

ORIGINAL RESPONSE:

a. The relevant portion of the Company's electric tariff, KY P.S.C. Electric No. 2, Sheet No. 24, page 1, has been in effect since May 1, 2020 and is available here: <https://psc.ky.gov/tariffs/Electric/Duke%20Energy%20Kentucky/Tariff.pdf>.

b. There is a threshold set on the accounts that should trigger a BPEM when it deviates a certain amount month to month. The Company will supplement this response.

c. Assuming this question refers to the usage monitoring procedures referenced in the response to part (a), the Company is still working on preparing this information and will supplement its response.

d. See response to part (c). Additionally, the Company performed a bill adjustment pursuant to 807 KAR 5:006, Section 11(2). The Company will supplement its response.

e. Please see COMPLAINT-DR-01-005(c) Attachment. Also, see response to part (c). The Company will supplement its response.

f. See response to part (c); the Company will supplement its response. The customer's meter change in March 2024 was not prompted by a usage monitoring investigation. Please see also the Service Order History:

- i. 9/13/2022 – Exchange Order Created – opt out request, notes indicate customer would like her smart meter removed, because her doctor told her it could be causing her to be sick.
- ii. 9/14/2022 – Exchange Order Completed for opt out; account charged \$100.00 fee
- iii. 3/19/2024 – Investigation Order Created – per meter reading DISPLAY FROZEN
- iv. 3/20/2024 – Investigation Order Completed – notes indicate “use 0’s to complete, display stuck on reset, installed same meter type (opt out), meter # 320 475 272, completed change order

PERSON RESPONSIBLE: As to supplemental response, Abigail Kappesser
As to original response, Kristi Stanifer

VERIFICATION

STATE OF OHIO)
)
COUNTY OF HAMILTON) SS:

The undersigned, Abigail Kappesser, Supervisor RS Business Operations, being duly sworn, deposes and says that she has personal knowledge of the matters set forth in the foregoing supplemental data requests, and that the answers contained therein are true and correct to the best of her knowledge, information, and belief.

Abigail Kappesser
Abigail Kappesser, Affiant

Subscribed and sworn to before me by Abigail Kappesser on this 31 day of March, 2026.

Emilie Sunderman
NOTARY PUBLIC

My Commission Expires: July 8, 2027



EMILIE SUNDERMAN
Notary Public
State of Ohio
My Comm. Expires
July 8, 2027

Duke Energy Kentucky
Case No. 2025-00118
STAFF Second Request for Information
Date Received: February 23, 2026

SUPPLEMENTAL STAFF-DR-02-005

REQUEST:

State when Duke Kentucky performed its periodic assessments of the meter from September 2022 to April 2024 and provide any relevant records. If Duke Kentucky was unable to read the meter, provide the required records indicating such pursuant to 807 KAR 5:006, Section (5)(d).

SUPPLEMENTAL RESPONSE:

Generally speaking, the Company performs periodic testing of meters by sample group; however, this customer's particular meter did not undergo a periodic test during the period of September 2022 to April 2024, apart from the tests on which information has already been provided.

ORIGINAL RESPONSE:

The meter was being read every month, but the meter was displaying all zeros. The meter usage/meter reading history is attached as STAFF-DR-02-005 Attachment. Records pertaining to testing and assessment of the meter are provided in the Company's responses to STAFF-DR-02-004 and COMPLAINANT-DR-01-003.

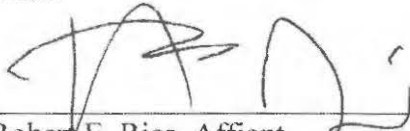
PERSON RESPONSIBLE:

As to supplemental response, Bob Ries
As to original response, Kristi Stanifer

VERIFICATION

STATE OF OHIO)
)
COUNTY OF HAMILTON) SS:

The undersigned, Robert E. Ries, Manager Field Metering, being duly sworn, deposes and says that he has personal knowledge of the matters set forth in the foregoing supplemental data requests, and that the answers contained therein are true and correct to the best of his knowledge, information, and belief.



Robert E. Ries, Affiant

Subscribed and sworn to before me by Robert E. Ries on this 30th day of March, 2026.



NOTARY PUBLIC

My Commission Expires: July 8, 2027



EMILIE SUNDERMAN
Notary Public
State of Ohio
My Comm. Expires
July 8, 2027