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PUBLIC SERVICE  
COMMISSION

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 SECOND 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. Produce Duke's internal escalation protocol(s) for :
  - a. Repeated zero usage readings,
  - b. Meter display or register trouble codes, and
  - c. Out-of-pattern usage under the tariff-mandated quarterly review.
2. Identify all individuals (by job title and department) who reviewed or were responsible for reviewing the December 22 "METER STOPPED" and January 2023 "DISPLAY FROZEN" codes and explain why no investigation or replacement occurred.

3. Explain in detail why no supervisor approval, BPEM escalation, or field investigation occurred between September 2022 and March 2024 despite multiple indications that a problem existed.

4. Produce all BPEM logs for Ms. Smith's account for the period September 2022 through March 2024, including all system rules, thresholds, and overrides that prevented escalation of earlier trouble codes.

5. Identify all individuals by job title and department who reviewed or were responsible for reviewing the December 2022 "METER STOPPED" and January 2023 "DISPLAY FROZEN" codes, and explain why no investigation or replacement of the meter occurred at that time.

6. Identify all quarterly usage reviews conducted for Ms. Smith's account between September 2022 and April 2024, including dates, personnel, and outputs.

7. Produce all deviation alerts, including any suppressed, dismissed, or overridden alerts.

8. Identify whether the meter removed from Ms. Smith's residence in March 2024 was tested for accuracy promptly after removal, and if not, explain why. Produce the chain-of-custody documentation for the removed meter, including dates, handling, and test personnel. Produce all test results from the meter removed from Ms. Smith's residence in March 2024, including a narrative explanation of the test results.

9. Provide an explanation for the contradiction between your statement that replacement of the meter in March 2024 was "not part of a usage investigation" and

your explicit statement in the November 19, 2024 letter that Duke completed an investigation and issued a backbill.

Respectfully submitted,

/s/ Melissa R. Dixon

Melissa R. Dixon (KBA 89817)

Legal Aid of the Bluegrass, Inc.

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*Counsel for Complainant, Stephanie  
Smith*

**CERTIFICATE OF SERVICE**

The foregoing Request for Information has been served as follows on the 25<sup>th</sup> day of March 2026:

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  
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Melissa R. Dixon, Esq.  
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