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**VIA EMAIL: PSCED@ky.gov**

April 14, 2026

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

**RECEIVED**

**APR 14 2026**

**PUBLIC SERVICE  
COMMISSION**

**Re: Case No. 2025-00118**  
In the Matter of: 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, its responses to Complainant's Second Request for Information.

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

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*Counsel for Duke Energy Kentucky, Inc.*

Enclosures: As stated

cc: Melissa R. Dixon (via email)

**KyPSC Case No. 2025-00118**  
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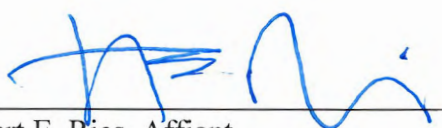
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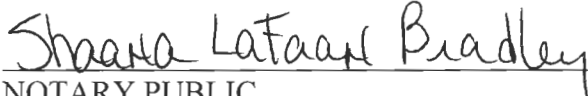
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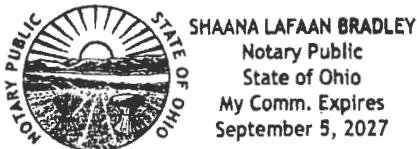
STATE OF OHIO                    )  
  )     **SS:**  
COUNTY OF HAMILTON        )

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 data requests, and that the information contained therein is true and correct to the best of his knowledge, information, and belief.

  
\_\_\_\_\_  
Robert E. Ries, Affiant

Subscribed and sworn to before me Robert E. Ries on this 9<sup>th</sup> day of April, 2026.

  
\_\_\_\_\_  
NOTARY PUBLIC



My Commission Expires: 09-05-2027

**Duke Energy Kentucky**  
**Case No. 2025-00118**  
**COMPLAINANT Second Request for Information**  
**Date Received: March 31, 2026**

**COMPLAINANT-DR-02-001**

**REQUEST:**

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.

**RESPONSE:**

- a. Repeated zero usage readings do not always indicate a concern or need for escalation. As such, the Company does not have any internal escalation protocol specifically for repeated zero usage readings. However, zero usage readings may cause alerts to be generated, such as for example when a zero usage reading triggers a BPEM under the process described in SUPPLEMENTAL-COMPLAINANT-DR-01-005 (b).
- b. Refer to STAFF-DR-02-006 for the Company's procedures when a trouble code is entered by a meter reader.
- c. Objection. This Interrogatory is vague, ambiguous, and unduly burdensome. The question is susceptible to different interpretations and Duke Energy Kentucky would have to engage in speculation or conjecture to ascertain the meaning of the phrase "quarterly review." Without waiving said objection, to the extent discoverable, and in the spirit of discovery, and assuming that the phrase "quarterly review" refers to reviews performed pursuant to 807 KAR

5:006, Section 11(3), which requires that a utility “monitor a customer’s usage at least quarterly,” the Company performs such review monthly and not quarterly. See SUPPLEMENTAL COMPLAINANT-DR-01-005, parts (b) and (c). Refer to SUPPLEMENTAL-COMPLAINANT-DR-01-005 for the Company’s procedures to evaluate customer usage to detect potential deviations.

**PERSON RESPONSIBLE:**

As to objection:

As to response:

Legal

Robert Ries – a., b.

Abigail Kappesser – c.

**Duke Energy Kentucky**  
**Case No. 2025-00118**  
**COMPLAINANT Second Request for Information**  
**Date Received: March 31, 2026**

**COMPLAINANT-DR-02-002**

**REQUEST:**

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.

**RESPONSE:**

The code on January 2023 was "Meter Says RF Optout."<sup>1</sup> The code "DISPLAY FROZEN" occurred in March 2024. See SUPPLEMENTAL COMPLAINANT-DR-01-005, parts (b) and (c).

The December 2022 "Meter Stopped" trouble message did not generate a BPEM due to a technical issue. As a result, this trouble code was not reviewed by any personnel.

The January 2023 "Meter Says RF Optout" message generated a BPEM which was reviewed by a Customer Relations Rep in the Metering Services organization. The rep noted that a letter was sent to Ms. Smith requesting access to the meter. The Company does not show any record of Ms. Smith contacting the Company as a result of this letter.

**PERSON RESPONSIBLE:** Robert Ries

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<sup>1</sup> In its response to STAFF-DR-02-006, the Company inadvertently stated incorrectly that "a meter reader(s) entered trouble code "display frozen" in January 2023." However, the information in SUPPLEMENTAL COMPLAINANT-DR-01-005 is correct.

**Duke Energy Kentucky**  
**Case No. 2025-00118**  
**COMPLAINANT Second Request for Information**  
**Date Received: March 31, 2026**

**COMPLAINANT-DR-02-003**

**REQUEST:**

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.

**RESPONSE:**

**Billing:** Two BPEMs generated for this customer during the period between September 2022 and March 2024. There was no escalation after the October 2022 BPEM, which occurred directly after the meter was exchanged; since the read appeared in the system as an actual read, the previous month's read was corrected to zero also. The other BPEM occurred in February 2023, when the meter readings were estimated twice. Since it appeared that actual reads were input after these two estimations, no escalation appeared to be necessary.

**Metering:** Under the Company's ordinary processes, BPEMs should have been generated as a result of the trouble codes entered by meter readers in November and December of 2022, however, due to a technical issue, BPEMs were not generated. Under the Company's ordinary processes, field investigation should have then occurred upon generation of the BPEM due to the trouble code in January of 2023. However, the metering services representative misinterpreted the trouble code as signifying inability to access the meter and sent a letter to the customer requesting access. The next time a trouble code was entered

in March of 2024, a BPEM was generated and a field investigative order was sent out which resulted in the meter being replaced.

**PERSON RESPONSIBLE:** As to billing, Abigail Kappesser  
As to metering, Robert Ries

**Duke Energy Kentucky**  
**Case No. 2025-00118**  
**COMPLAINANT Second Request for Information**  
**Date Received: March 31, 2026**

**COMPLAINANT-DR-02-004**

**REQUEST:**

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.

**RESPONSE:**

Please see below for a list of seven BPEMs associated with Ms. Smith's account between September 2022 and March 2024.

- 10/17/2022 – Meter Test Results Received – Status of “Fail”
- 10/18/2022 – Current Reading Lower Than Previous Reading – generated due to an “overflow.” The current meter read was 0 kWh, while the reading for the prior month was 8 kWh. The performer reversed the reading for the prior month and changed it to 0 kWh.
- 1/18/2023 – Estimate Threshold Exceeded – generated due to the number of consecutive estimates for this account exceeding the control which was set at two consecutive months. This control was overridden by a performer, and the meter was allowed to estimate. Subsequently, it appeared that actual readings were being obtained.
- 1/18/2023 – Trouble Code: Meter Damaged – generated due to a trouble code entered by the meter reader. A metering services rep reviewed this BPEM and issued a letter to the customer requesting access.

- 7/18/2023 – Contract Blocked for Billing – generated when billing is attempted for the account and it is found to be blocked for billing. This block was placed by IT due to a rate repair on 7/18/2023 and was later removed which led to resolution of the BPEM on 7/22/2023.
- 3/18/2024 – Trouble Code: Display Issue – generated due to a trouble code entered by the meter reader. A field investigative order was issued and the meter replaced.
- 3/20/2024 – Review Investigation – The performer reviewed and determined the meter was replaced and resolved the BPEM.

**PERSON RESPONSIBLE:**

As to billing, Abigail Kappesser  
As to metering, Robert Ries

**Duke Energy Kentucky**  
**Case No. 2025-00118**  
**COMPLAINANT Second Request for Information**  
**Date Received: March 31, 2026**

**COMPLAINANT-DR-02-005**

**REQUEST:**

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.

**RESPONSE:**

Objection. To the extent, this request is intended to be duplicative of COMPLAINANT-DR-02-002, it must be seen as intending to harass. Without waiving said objection, to the extent discoverable, and in the spirit of discovery, please see response to COMPLAINANT-DR-02-002.

**PERSON RESPONSIBLE:**           Legal

**Duke Energy Kentucky**  
**Case No. 2025-00118**  
**COMPLAINANT Second Request for Information**  
**Date Received: March 31, 2026**

**COMPLAINANT-DR-02-006**

**REQUEST:**

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

**RESPONSE:**

Objection. This Interrogatory is vague, ambiguous, and unduly burdensome. The question is susceptible to different interpretations and Duke Energy Kentucky would have to engage in speculation or conjecture to ascertain the meaning of the phrase “quarterly usage reviews.” Without waiving said objection, to the extent discoverable, and in the spirit of discovery, and assuming that the phrase “quarterly usage reviews” refers to reviews performed pursuant to 807 KAR 5:006, Section 11(3), which requires that a utility “monitor a customer’s usage at least quarterly,” the Company performs such review monthly and not quarterly. See SUPPLEMENTAL COMPLAINANT-DR-01-005, parts (b) and (c). Billing does not complete *quarterly* usage reviews. For this customer we reviewed the account after the failed meter test came up on a report that is run quarterly. Billing had reviewed the usage in October 2022 (the meter read after the meter was changed), and reviewed estimated reads in February 2023 since the reads were estimated twice. Lastly, Billing reviewed the read in April 2024 after the meter was changed.

**PERSON RESPONSIBLE:**           As to objection, Legal  
  As to response, Abigail Kappesser

**Duke Energy Kentucky**  
**Case No. 2025-00118**  
**COMPLAINANT Second Request for Information**  
**Date Received: March 31, 2026**

**COMPLAINANT-DR-02-007**

**REQUEST:**

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

**RESPONSE:**

A Billing Process Exception Management (BPEM) is a deviation alert designed to identify potential billing irregularities. BPEMs associated with Ms. Smith's account are detailed in response to COMPLAINANT-DR-02-004. See also SUPPLEMENTAL COMPLAINANT-DR-01-005.

**PERSON RESPONSIBLE:** Abigail Kappesser

**Duke Energy Kentucky**  
**Case No. 2025-00118**  
**COMPLAINANT Second Request for Information**  
**Date Received: March 31, 2026**

**COMPLAINANT-DR-02-008**

**REQUEST:**

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.

**RESPONSE:**

This Interrogatory is vague, ambiguous, and unduly burdensome. The term “promptly” and the phrase “chain-of-custody documentation” are susceptible to different interpretations and Duke Energy Kentucky would have to engage in speculation or conjecture to ascertain the intended meaning of this request. Without waiving said objection, to the extent discoverable, and in the spirit of discovery, the meter was removed from Ms. Smith’s property by a meter technician on 3/20/2024 and placed in a holding area to await testing. On 3/27/2024 the meter was transported to the laboratory, and testing was performed on 7/3/2024.

Please refer to STAFF-DR-02-004 for meter test results. The meter tester was unable to complete the test of the meter due to the meter base being severely damaged. The meter tester retired the meter.

Clone Device | History Report

Register	Activity	Solid State	Comm	PI	Comments	Miscellaneous
Meter	108268903IT					
Alternate ID	108268903					
Status	Retired					
Type Code	1NFJFK					
Usage Code	1N					
Location Code	QGM					
Company Code	ULH&P					
Periodic Interval						
Sample Group						
Tamper Code						
Service ID	6006988338					
Shipment ID						
Line Item ID						
Batch						
Bin						
Pallet						
Box						
Purchase Group	004364					

	Date	By
Receive	3/27/2024 9:16:33 AM	JJZAPPA
Pack		
Stock	2/21/2017 8:26:50 AM	85317
Retire	7/3/2024 9:56:02 AM	T97127
Connect		
Disconnect		
Change	7/3/2024 9:56:02 AM	T97127
Remove	3/21/2024 4:00:00 AM	PP1SERVUSE
Install	9/14/2022 4:00:00 AM	PP1SERVUSE

Manufacture Date: 3/7/2016

Retire Reason Code: BASE

Remove Reason Code: MZRI

Hold  Obsolete  New

Create Add Transaction to SAP

**PERSON RESPONSIBLE:**

As to objection, Legal  
 As to response, Robert Ries

**Duke Energy Kentucky**  
**Case No. 2025-00118**  
**COMPLAINANT Second Request for Information**  
**Date Received: March 31, 2026**

**COMPLAINANT-DR-02-009**

**REQUEST:**

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.

**RESPONSE:**

Objection. This Interrogatory is vague, ambiguous, and unduly burdensome. The interrogatory does not cite any source for the alleged quotation and Duke Energy Kentucky would have to engage in speculation or conjecture to ascertain the meaning of the phrase "quarterly usage reviews." Without waiving said objection, to the extent discoverable, and in the spirit of discovery, if the question pertains to the Company's statements in COMPLAINANT-DR-01-006 that "changing out of the meter in March 2024 was not prompted by a usage monitoring investigation," the Company's statement referred to a "usage *monitoring* investigation" (emphasis added) not a "usage investigation," where a "usage *monitoring* investigation" was specifically referring to the monthly monitoring performed by the Company for unusual deviations, pursuant to 807 KAR 5:006, Section 3. The meter was not replaced because an unusual deviation from prior usage was identified. Rather, the meter was replaced due to the meter being reported to have a frozen display.

After the quarterly meter test results were received, an investigation into the usage was conducted.

**PERSON RESPONSIBLE:** As to objection, Legal  
As to response, Robert Ries