

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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| ELECTRONIC APPLICATION OF DUKE ENERGY )  |  |            |
| KENTUCKY, INC. FOR 1) AN ADJUSTMENT OF ) |  | CASE NO.   |
| THE NATURAL GAS RATES; 2) APPROVAL OF )  |  | 2025-00125 |
| NEW TARIFFS; AND 3) ALL OTHER REQUIRED ) |  |            |
| APPROVALS, WAIVERS, AND RELIEF )         |  |            |

COMMISSION STAFF'S FOURTH REQUEST FOR INFORMATION  
TO DUKE ENERGY KENTUCKY, INC.

Duke Energy Kentucky, Inc. (Duke Kentucky), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due on September 12, 2025. The Commission directs Duke Kentucky to the Commission's July 22, 2021 Order in Case No. 2020-00085<sup>1</sup> regarding filings with the Commission. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

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 or the person supervising the preparation of the response on behalf of the entity that the

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<sup>1</sup> Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC July 22, 2021), Order (in which the Commission ordered that for case filings made on and after March 16, 2020, filers are NOT required to file the original physical copies of the filings required by 807 KAR 5:001, Section 8).

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 copied 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. Refer to Duke Kentucky's response to Commission Staff's First Request for Information (Staff's First Request), Item 3, Attachment. Explain the substantial increase in allocated payroll tax expense from the actual expenses to the forecasted expenses.

2. Refer to Duke Kentucky's response to Staff's First Request, Item 3, Attachment. Identify and explain what regulatory asset was fully amortized in April 2025.

3. Refer to Duke Kentucky's response to Staff's First Request, Item 2, Attachment. Explain the approximate 1056 percent variance in Industrial Gas Transportation – Unbilled.

4. Refer to Duke Kentucky's response to Staff's First Request, Item 2, Attachment. Explain the approximate 441 percent variance in Gas Losses Damaged Lines.

5. Refer to Duke Kentucky's response to Staff's First Request, Item 2, Attachment. Explain the line item Provision for Rate Refund.

6. Refer to Duke Kentucky's response to Staff's First Request, Item 51. Explain the variance between 2022, 2023, and 2024 for transmission line maintenance expense per mile. Include in the response specific examples to illustrate the basis for the variance.

7. Refer to Duke Kentucky's response to Staff's First Request, Item 51. Explain the variance between 2022, 2023, and 2024 for sales promotion expense per customer. Include in the response specific examples to illustrate the basis for the variance.

8. Refer to the Application, the Direct Testimony of Jefferson Brown (Brown Direct Testimony), page 9, lines 12-14. Provide the amount of property tax included in the base period that Duke Kentucky is currently disputing with the Commonwealth of Kentucky.

9. Refer to Duke Kentucky's response to Staff's First Request, Item 51, Attachment. Explain why the interest expense is consistently increasing. Include in this response any measures Duke Kentucky is taking to reduce its interest expense.

10. Refer to Duke Kentucky's response to Staff's First Request, Item 52, Attachment. Explain the approximate 50 percent decrease in nonrecurring charges collected from 2023 to 2024.

11. Refer to Duke Kentucky's response to the Attorney General's First Request for Information (Attorney General's First Request), Item 7. For the period January 2023 through the date of service of this request, provide the number of times Duke Kentucky natural gas personnel, executive or otherwise, have utilized the referenced aircraft(s) and helicopter(s) by month and by trip within that month.

12. Refer to Duke Kentucky's response to the Attorney General's First Request, Item 8. Explain why Duke Kentucky is still utilizing 20.9 percent automated meter read (AMR) meters instead of the advanced metering infrastructure (AMI) meters.

13. Refer to Schedule WPD-2.21a. Explain how Duke Kentucky intends to reduce the uncollectible expense in the forecasted test period.

14. Refer to Schedule WPB-5.1e. Explain how Duke Kentucky's forecasted amount of gas storage after March of 2025 remains at \$1,610,670 until the end of the Test Period, considering seasonal gas use.

15. Refer generally to the Lead Lag Study. Provide updated calculations of lead and lag days with the interest on long-term debt.

16. Refer generally to the Lead Lag Study. Explain whether non-cash items were excluded in their entirety in the calculation.

17. Provide the late fees collected for the years 2020 through 2025, by month. As part of this response, confirm that these late fees were collected based on delinquent gas bills. If not confirmed, explain the response.

18. Refer to the Brown Direct Testimony at pages 16-20. Discuss whether Duke Kentucky considered a restructure of the Rider PMM since the project changed from a pipeline to a multiple part pipeline and services. If so, explain why Duke Kentucky chose not to restructure the Rider PMM.

19. Refer to the Brown Direct Testimony at pages 16-20. Explain whether Duke Kentucky would be able to provide a list of projects each year as part of its list of projected expenses in its annual filing for the Rider PMM.

20. Refer to the Brown Direct Testimony, pages 16-20. Explain how Duke Kentucky anticipates maintaining the initial cost estimates, as updated in requests for information, in light of the increase in the amount of service territory and the individual sections of the infrastructure implicated with expanding the project to Aldyl-A.

21. Provide the current number of Duke Kentucky customer accounts set to autopay their bill (autopay accounts). Include in the response, Duke Kentucky's total number of customer accounts as well as a calculation of the percentage of auto-pay accounts relative to the total number of customer accounts. Additionally, provide the number set to autopay for calendar years 2022, 2023, and 2024 as well as the percentage of auto-pay accounts relative to the total number of customer accounts.

22. Provide the number of days from the end of the billing period to the time a bill is mailed to a customer.

23. Provide the number of Duke Kentucky customer accounts set to receive e-billing currently and by month for each of 2022, 2023, and 2024. Include in the response this number relative to the total number of customer accounts as well as a percentage of the total number of customer accounts.

24. Refer to Duke Kentucky's response to the Attorney General's Second Request for Information, Item 9(c), in which Duke Kentucky states that "Financially, the plan introduces a mechanism whereby penalties collected from interruptible customers who exceed usage limits during interruptible (Stage 1) events are then redistributed to all customers in accordance with the Company's gas cost adjustment provisions." Also, refer to the Application, Schedule L-2.2, page 43 of 58 which shows the deletion of the Penalty Refund provision of the Curtailment Plan.

a. Given the proposed deletion of the Penalty Refund provision of the Curtailment Plan, explain where in the proposed tariff it states that penalties collected from interruptible customers who exceed usage limits during interruptible events would be redistributed to all customers in accordance with the gas cost adjustment provisions.

b. Explain why Duke Kentucky is proposing the removal of the current Penalty Refund provision and confirm that there is an impact on the current calculation of gas cost. If confirmed, identify and explain the impact.

25. Refer to Duke Kentucky's response to Commission Staff's Third Request for Information, Item 2, Attachment. For each year from 2023 to date, provide the number of non-residential customers that participated in the seasonal soft close option.

*Linda Bridwell RP*

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DATED **AUG 28 2025**

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cc: Parties of Record

Case No. 2025-00125

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