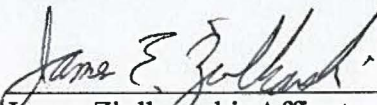


VERIFICATION

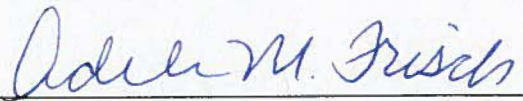
STATE OF OHIO)
) **SS:**
COUNTY OF HAMILTON)

The undersigned, James Ziolkowski, Director of Rates & Regulatory Planning, being duly sworn, deposes and says that he has personal knowledge of the matters set forth in the foregoing data requests, and that the answers contained therein are true and correct to the best of his knowledge, information and belief.


James Ziolkowski, Affiant

Subscribed and sworn to before me by James Ziolkowski on this 24th day of February, 2015.

ADELE M. FRISCH
Notary Public, State of Ohio
My Commission Expires 01-05-2019

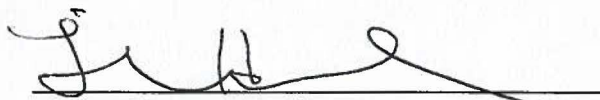

NOTARY PUBLIC

My Commission Expires: 1/5/2019

VERIFICATION


STATE OF OHIO)
) SS:
COUNTY OF HAMILTON)

The undersigned, Trisha Haemmerle, Strategy & Collaboration Manager, being duly sworn, deposes and says that she has personal knowledge of the matters set forth in the foregoing data requests, and that the answers contained therein are true and correct to the best of her knowledge, information and belief.


Trisha Haemmerle, Affiant

Subscribed and sworn to before me by Trisha Haemmerle on this 24TH day of February, 2015.


ADELE M. FRISCH
Notary Public, State of Ohio
My Commission Expires 01-05-2019


NOTARY PUBLIC

My Commission Expires: 1/5/2019

TABLE OF CONTENTS

<u>DATA REQUEST</u>	<u>WITNESS</u>	<u>TAB NO.</u>
STAFF-DR-02-001	James Ziolkowski/Trisha Haemmerle	1
STAFF-DR-02-002	James Ziolkowski	2
STAFF-DR-02-003	Trisha Haemmerle	3
STAFF-DR-02-004	Trisha Haemmerle	4
STAFF-DR-02-005	James Ziolkowski	5
STAFF-DR-02-006	Trisha Haemmerle	6

REQUEST:

Refer to the Application, Appendix B, page 1.

- a. Provide an explanation and support for the gas and electric amounts in the 2013 Reconciliation.
- b. Refer to columns 11 and 12 for Residential Programs. Provide by month and year, in Excel spreadsheet format with formulas intact and all cells unprotected, the applicable gas and electric demand-side management (“DSM”) rates charged and the corresponding monthly revenues collected. If this information was collected for a period prior to July 2013 through June 2014, provide updated information for a time period through December 31, 2014.
- c. Refer to column 8 for Commercial Programs. Provide by month and year, in Excel spreadsheet format with formulas intact and all cells unprotected, the applicable DSM rates charged and the corresponding monthly revenues collected. If this information was collected for a period prior to July 2013 through June 2014, provide updated information for a time period through December 2014.
- d. Provide by month and year, in Excel spreadsheet format with formulas intact and all cells unprotected, the applicable DSM rate charged and the corresponding monthly revenues collected for the Power Share program. If this information was collected for a period

prior to July 2013 through June 2014, provide updated information for a time period through December 31, 2014.

RESPONSE:

- a. The 2013 reconciliation is the over/under collection amount as calculated in the prior year's true-up in Case No. 2013-00395. See STAFF-DR-02-001 Attachment A tab Page 1 columns 13 and 14 for residential and column 9 for non-residential.
- b. STAFF-DR-02-001 Attachment B shows the DSM rates and revenues collected by month for the period July 2013 through June 2014. Residential electric and residential gas data appear in separate tabs in the spreadsheet.
- c. STAFF-DR-02-001 Attachment B shows the actual electric non-residential DSM rates and revenues collected by month for the period July 2013 through June 2014. The file STAFF-DR-02-001 Attachment C shows the allocation of the distribution customer DSM revenues and Rate TT DSM revenues between the PowerShare program and the other non-residential programs. This spreadsheet "builds up" part (a) and part (b) revenues by applying the part (a) and (b) rates to the associated kWh sales for a given month. Part (a) revenues are credited against the standard DSM programs, and part (b) revenues recover PowerShare costs. Because of rounding errors and prior-period billing adjustments, the total revenues calculated through the "build-up" process exceeded the actual booked revenues by \$17,214. The Company elected to use the higher revenue credit amount in this filing.
- d. Please see the response to part (c).

PERSON RESPONSIBLE: James E. Ziolkowski
Trisha Haemmerle

Duke Energy Kentucky
Case No. 2014-00388
STAFF'S 2nd Set of Data Requests
Date Received: February 13, 2015

STAFF-DR-02-002

REQUEST:

Refer to the response to Commission Staff's First Request for Information ("Staff's First Request"), Item 1.b.

- a. Provide the percentage of total residential gas sales that is represented by the 26,044 Ccf load impact shown on Attachment b, Summary of Load Impacts July 2013 through June 2014.
- b. Provide the percentage of total residential gas sales that is represented by the individual load impacts for each residential program shown on Attachment b, Summary of Load Impacts July 2013 through June 2014.
- c. Provide the percentage of total residential electric sales that is represented by the 26,933,728 kWh load impact shown on Attachment b, Summary of Load Impacts July 2013 through June 2014.
- d. Provide the percentage of total residential electric sales that is represented by the individual load impacts for each residential program shown on Attachment b, Summary of Load Impacts July 2013 through June 2014.

RESPONSE:

Please see the table below.

Summary of Load Impacts July 2013 Through June 2014*				
	Load Impacts Net of Free Riders at Meter			
Residential Programs	kWh	% of Total Res Sales	ccf	% of Total Res Sales
Appliance Recycling Program	657,793	0.0433%	-	0.0000%
Energy Efficiency Education Program for Schools	225,486	0.0148%	7,368	0.0103%
Low Income Neighborhood	634,158	0.0417%	-	0.0000%
Low Income Services	251,243	0.0165%	7,771	0.0108%
My Home Energy Report**	11,325,468	0.7449%	-	0.0000%
Residential Energy Assessments	411,489	0.0271%	10,866	0.0151%
Residential Smart Saver®	13,428,091	0.8831%	40	0.0001%
Power Manager***	-	0.0000%	-	0.0000%
Total Residential	26,933,728	1.7714%	26,044	0.0362%
Total Residential (Rate RS) Sales For July 2013 Through June 2014	1,520,477,786	100%	71,881,990	100%
*Impacts are without losses and reflected at the customer meter point				
**Actual participants and impact capability shown as of the June 2014 mailings.				
***Cumulative number of controlled devices installed. Impacts reflect average capability over the contract period.				

PERSON RESPONSIBLE: James E. Ziolkowski

**Duke Energy Kentucky
Case No. 2014-00388
STAFF'S 2nd Set of Data Requests
Date Received: February 13, 2015**

STAFF-DR-02-003

REQUEST:

Refer to the response to Staff's First Request, Item 12. Confirm that the average estimated annual DSMR rider cost for electric customers is projected to increase approximately 52 percent, while the projected average annual DSMR rider cost for gas customers is more than double the current cost.

RESPONSE:

Yes, the average estimated annual DSMR rider cost for electric customers is projected to increase by approximately 52 percent and the projected average annual DSMR rider cost for gas customers is projected to be more than double the current cost. This large increase in the monthly DSMR charge is primarily due to the fact that gas customers received a bill credit in 2012 and 2013, which caused Duke Energy Kentucky to be under collected by over \$5 million for the 2013 – 2014 program year.

PERSON RESPONSIBLE: Trisha Haemmerle

REQUEST:

Refer to the response to Staff's First Request, Item 13.

- a. Based on Duke Kentucky's allocation methodology discussed in the response to subparts a. and b. of this request, show the cost allocations to electric customers and gas customers, respectively, for every Residential Smart Saver Program measure shown on pages 1 and 2 of Attachment C.
- b. In Excel spreadsheet format with formulas intact and all cells unprotected, and in a format similar to that used in Attachment C, provide the same information by measure, indicating whether the measure is specifically targeted to gas and/or electric, the projected participants by gas and/or electric, projected savings by Ccf and/or kWh, projected gas and/or electric program costs resulting from application of the measures, and the projected lost revenues by gas and/or electric.
- c. In Excel spreadsheet format with formulas intact and all cells unprotected, provide for measure RCFL Opt-In Free CFLs the number and wattage of compact florescent light ("CFL") bulbs distributed, the time period for the lost revenues, and kWh savings per CFL.
- d. Irrespective of Duke Kentucky's allocation methodology, for every Residential Smart Saver Program measure shown on pages 1 and 2 of Attachment C, show allocations of

Projected Program Costs and Projected Lost Revenues between electric and gas customers based on:

1. Saturation of electric vs. gas water heating for Faucet Aerators, Showerheads, and Pipe Wrap measures;
2. 100 percent to electric customers for Heat Pump Water Heater, Pool Pump, all lighting, Central Air Conditioner, and Heat Pump measures; and
3. Saturation of electric vs. gas space heating for Duct Insulation and Duct Sealing measures.

RESPONSE:

- a. See STAFF-DR-02-004 Attachment a_b_d
- b. See STAFF-DR-02-004 Attachment a_b_d
- c. See STAFF-DR-02-004 Attachment c
- d. See STAFF-DR-02-004 Attachment a_b_d

PERSON RESPONSIBLE: Trisha Haemmerle

**Duke Energy Kentucky
Case No. 2014-00388
STAFF'S 2nd Set of Data Requests
Date Received: February 13, 2015**

STAFF-DR-02-005

REQUEST:

Refer to the response to Staff's First Request, Item 14. Provide in a similar format in an Excel spreadsheet, with formulas intact and all cells unprotected, the same information by RATEC and RATECODE including the average monthly usage for electric and gas.

RESPONSE:

Please see STAFF-DR-02-005 Attachment.

PERSON RESPONSIBLE: James E. Ziolkowski

REQUEST:

- a. Explain whether there are DSM programs in other Duke Energy, Inc. operating utilities for which costs and lost revenues are attributed to gas customers.
- b. If so, provide the name of the operating utility or utilities, the allocation method used to assign costs and calculate rates for gas and electric customers, the resulting percentage breakdown of cost between gas and electric, and whether it is by DSM portfolio or program.

RESPONSE:

- a. There are no other DSM programs in other Duke Energy operating utilities for which costs and lost revenues are attributed to gas customers.
- b. There are no other DSM programs offered by any other Duke Energy utility operating company for which costs and lost revenues are attributed to gas customers. Duke Energy Ohio is the only other Duke Energy utility operating company that, like Duke Energy Kentucky, offers its customer both electric and gas service. Duke Energy Ohio differs from Duke Energy Kentucky in that its DSM programs are specifically associated with electric customers, because the State has electric only energy efficiency mandates, which only are evaluated based on the savings associated with solely with electricity.

PERSON RESPONSIBLE: Trisha Haemmerle