

VERIFICATION

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

The undersigned, Bruce L. Sailors, Pricing and Regulatory Solutions Manager, 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.

Bruce L. Sailors
Bruce L. Sailors, Affiant

Subscribed and sworn to before me by Bruce L. Sailors, on this 1ST day of NOVEMBER, 2017.

Adele M. Frisch
NOTARY PUBLIC


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

My Commission Expires: 1/5/2019

VERIFICATION

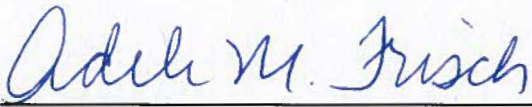
STATE OF OHIO)
)
COUNTY OF HAMILTON) SS:

The undersigned, William Don Wathen Jr., Director of Rates & Regulatory Strategy, 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.



William Don Wathen Jr., Affiant

Subscribed and sworn to before me by William Don Wathen Jr., on this 10TH day of NOVEMBER, 2017.



NOTARY PUBLIC

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

My Commission Expires: 11/5/2019

VERIFICATION

STATE OF OHIO)
)
COUNTY OF HAMILTON) SS:

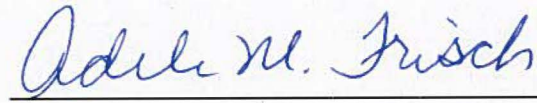
The undersigned, James E. Ziolkowski, Director, Rates & Regulatory Planning, being duly sworn, deposes and says that he has personal knowledge of the matters set forth in the foregoing data requests, and that the answers contained therein are true and correct to the best of his knowledge, information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



James E. Ziolkowski Affiant

Subscribed and sworn to before me by James E. Ziolkowski on this 8TH day of NOVEMBER, 2017.

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



NOTARY PUBLIC

My Commission Expires: 1/5/2019

VERIFICATION

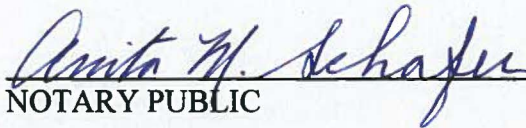
STATE OF OHIO)
) SS:
COUNTY OF HAMILTON)

The undersigned, Sarah E. Lawler, Utility Strategy Director, 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.



Sarah E. Lawler Affiant

Subscribed and sworn to before me by Sarah E. Lawler on this 6th day of NOVEMBER, 2017.



NOTARY PUBLIC

My Commission Expires:



ANITA M. SCHAFER
Notary Public, State of Ohio
My Commission Expires
November 4, 2019

KyPSC Case No. 2017-00321
NORTHERN KENTUCKY UNIVERSITY'S FIRST SET
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**Duke Energy Kentucky
Case No. 2017-00321
Northern Kentucky University's First Set Data Requests
Date Received: October 27, 2017**

NKU-DR-01-001

REQUEST:

Please provide all Section M schedules in Excel format with all formulas intact.

RESPONSE:

See NKU-DR-01-001 Attachment 1 (Base Period) and Attachment 2 (Test Period)
provided on CD.

PERSON RESPONSIBLE: Bruce L. Sailors

NKU-DR-01-001
ATTACHMENT 1 IS BEING
PROVIDED ON CD

NKU-DR-01-001
ATTACHMENT 2 IS BEING
PROVIDED ON CD

Duke Energy Kentucky
Case No. 2017-00321
Northern Kentucky University's First Set Data Requests
Date Received: October 27, 2017

NKU-DR-01-002

REQUEST:

Please provide all Section N schedules in Excel format with all formulas intact.

RESPONSE:

See attachments in response to NKU-DR-01-001.

PERSON RESPONSIBLE: Bruce L. Sailors

**Duke Energy Kentucky
Case No. 2017-00321
Northern Kentucky University's First Set Data Requests
Date Received: October 27, 2017**

NKU-DR-01-003

REQUEST:

To the extent not already provided, please provide in Excel format with all formulas intact all workpapers supporting the direct testimony and attachments of Mr. Sailers.

RESPONSE:

See NKU-DR-01-003 Attachment 1 (Income Based Average Usage Calculation). Also see attachments in response to the following data requests.

- Staff-DR-01-071
- Staff-DR-02-064
- NKU-DR-01-001
- KSBA-DR-01-017

PERSON RESPONSIBLE: Bruce L. Sailers

LI_ID	KWHID	Total_KWH	Avg_KWH	NumAccts
0	1	5,952,648	1,422	4187
0	2	20,255,613	4,095	4946
0	3	85,657,532	6,617	12945
0	4	212,166,246	9,988	21242
0	5	228,857,558	13,867	16504
0	6	180,793,612	17,800	10157
0	7	255,472,266	26,016	9820
1	1	2,183,112	1,604	1361
1	2	9,313,853	4,096	2274
1	3	33,594,229	6,555	5125
1	4	66,192,886	9,934	6663
1	5	61,407,772	13,790	4453
1	6	43,499,158	17,784	2446
1	7	54,748,635	25,137	2178

Overall Average kWh / Customer	Accts
Low Income	11,059
Not Low Income	12,395

These results use an inflection point of 200% of Poverty Level; Only use accounts with 12 months of data in CY2016; and remove all accounts with < 0 kWh. These results are also based on specific account & tenant combinations to identify unique customers.

**Duke Energy Kentucky
Case No. 2017-00321
Northern Kentucky University's First Set Data Requests
Date Received: October 27, 2017**

NKU-DR-01-004

REQUEST:

To the extent not already provided, please provide in Excel format with all formulas intact all attachments to Mr. Sailers' direct testimony.

RESPONSE:

See the attachments provided in response to Staff-DR-01-071.

PERSON RESPONSIBLE: Bruce L. Sailers

Duke Energy Kentucky
Case No. 2017-00321
Northern Kentucky University's First Set Data Requests
Date Received: October 27, 2017

NKU-DR-01-005

REQUEST:

With respect to the Company's response to Staff DR-01-027, please break down the base period average monthly customer bills (186) for Rate Schedule DT by customer charge type (Single Phase, Three Phase and Primary Voltage).

RESPONSE:

From Schedule M-2.2 Pages 4 and 5 of 22, the total annual billing month determinants are:

- Single Phase = 0
- Three Phase = 1,786
- Primary = 443

Converting this information into an average monthly bills value is done by dividing the value by 12 resulting in the following.

- Single Phase = $0 / 12 = 0$
- Three Phase = $1,786 / 12 = 149$
- Primary = $443 / 12 = 37$

PERSON RESPONSIBLE: Bruce L. Sailors

Duke Energy Kentucky
Case No. 2017-00321
Northern Kentucky University's First Set Data Requests
Date Received: October 27, 2017

NKU-DR-01-006

REQUEST:

With respect to Mr. Sailers' direct testimony at page 10, line 17, he states that the proposed customer charge for Rate DT primary service is \$465. Please reconcile this charge with the value shown in cell I33, \$155.07, of the tab "CustomerCharge" contained in the cost of service study Excel spreadsheet provided in response to Staff DR-01-029.

RESPONSE:

The values do not reconcile. The proposed customer charges for Rate DT inadvertently and incorrectly used only the number of summer bills in the calculation rather than the total number of bills. Note that total revenues collected from the proposed charges collect the Rate DT revenue requirement from the cost of service study. Therefore, altering the proposed customer charges also impact the other charges of the proposed rate. To display the correct Rate DT charges using the appropriate total number of bills, examples of what Schedule M-2.2 and M-2.3 Pages 4 and 5 of 20 would look like for the Test Period are provided in NKU-DR-01-006 Attachment 1, which is being provided on CD.

PERSON RESPONSIBLE: Bruce L. Sailers

NKU-DR-01-006
ATTACHMENT 1 IS BEING
PROVIDED ON CD

Duke Energy Kentucky
Case No. 2017-00321
Northern Kentucky University's First Set Data Requests
Date Received: October 27, 2017

NKU-DR-01-007

REQUEST:

With respect to the Company's new Rider ESM, please provide the following information:

- a. Describe how the costs recovered under the rider will be allocated to classes.
- b. Describe how the costs will be recovered from classes. Include a description of the proposed charges for each class (per kWh, per kW, percent of monthly bill, etc.).

RESPONSE:

- a. As outlined in the direct testimony of Sarah E. Lawler, Attachment SEL-2, the costs recovered under the rider will be allocated to residential and non-residential customers based on average monthly revenue as a percentage of total revenue, excluding ESM revenue.
- b. The monthly environmental surcharge factor will be a percentage of the customer's monthly bill. For residential customers, the surcharge will be based on a percentage of revenues excluding ESM revenues. For non-residential customers, the surcharge will be based on a percentage of non-fuel revenues excluding ESM revenues. The initial charge will be calculated on the first Rider ESM filing.

PERSON RESPONSIBLE: Sarah E. Lawler

Duke Energy Kentucky
Case No. 2017-00321
Northern Kentucky University's First Set Data Requests
Date Received: October 27, 2017

NKU-DR-01-008

REQUEST:

With respect to the Company's new Rider FTR, please provide the following information:

- a. Describe how the costs recovered under the rider will be allocated to classes.
- b. Describe how the costs will be recovered from classes. Include a description of the proposed charges for each class (per kWh, per kW, percent of monthly bill, etc.).

RESPONSE:

- a. Rider FTR is designed to "track" the difference between amounts in base rates and actual costs. Therefore, the dollars to be recovered under Rider FTR are proposed to be allocated based on each rate class' respective share of total kWh sales.
- b. The proposed charges will be recovered from each class by a \$ / kWh charge as shown in the Rider FTR template provided in Attachment WDW-1, Schedule 1.

PERSON RESPONSIBLE: William Don Wathen Jr.

**Duke Energy Kentucky
Case No. 2017-00321
Northern Kentucky University's First Set Data Requests
Date Received: October 27, 2017**

NKU-DR-01-009

REQUEST:

With respect to the Company's new Rider DCI, please provide the following information:

- a. Describe how the costs recovered under the rider will be allocated to classes.
- b. Describe how the costs will be recovered from classes. Include a description of the proposed charges for each class (per kWh, per kW, percent of monthly bill, etc.).

RESPONSE:

- a. See Attachment SEL-3, page 2 of 7.
- b. See response to NKU-DR-01-009(a).

PERSON RESPONSIBLE: Sarah E. Lawler

**Duke Energy Kentucky
Case No. 2017-00321
Northern Kentucky University's First Set Data Requests
Date Received: October 27, 2017**

NKU-DR-01-010

REQUEST:

To the extent not already provided, please provide in Excel format with all formulas intact all workpapers supporting the direct testimony and attachments of Mr. Ziolkowski.

RESPONSE:

The information was provided in response to Staff-DR-01-29.

PERSON RESPONSIBLE: James E. Ziolkowski

Duke Energy Kentucky
Case No. 2017-00321
Northern Kentucky University's First Set Data Requests
Date Received: October 27, 2017

NKU-DR-01-011

REQUEST:

To the extent not already provided, please provide in Excel format with all formulas intact all attachments to Mr. Ziolkowski's direct testimony.

RESPONSE:

Please see response to STAFF-DR-01-029 for a copy of Duke Energy Kentucky's Cost of Service model.

Please see NKY-DR-01-011 Attachment for a copy of Attachments JEZ-1 and JEZ-2.

PERSON RESPONSIBLE: James E. Ziolkowski

DUKE ENERGY KENTUCKY, INC.
ELECTRIC COST OF SERVICE STUDY
CASE NO: 2017-00321
ALLOCATION FACTORS FOR COST OF SERVICE STUDY

Attachment JEZ-1

LINE NO.	RATE GROUP	12 CP DEMAND RATIO % A	AVG & EXCESS RATIO % B	DIFFERENCE % C = B - A	S/S RATIO % D	DIFFERENCE % E = D - A
1						
2	Retail:					
3	Residential	41.780%	41.043%	-0.737%	41.764%	-0.016%
4	Dist Secondary - DS	29.423%	28.228%	-1.195%	29.561%	0.138%
5	Dist Secondary - GS-FL	0.136%	0.133%	-0.003%	0.135%	-0.001%
6	Dist Secondary - EH	0.479%	0.620%	0.141%	0.443%	-0.036%
7	Dist Secondary - SP	0.007%	0.007%	0.000%	0.007%	0.000%
8	Dist Secondary - DT	13.928%	14.529%	0.601%	13.915%	-0.013%
9	Dist Primary - DT	9.544%	10.107%	0.563%	9.523%	-0.021%
10	Dist Primary - DP	0.348%	0.334%	-0.014%	0.345%	-0.003%
11	Transmission	4.208%	4.379%	0.171%	4.171%	-0.037%
12	Lighting	0.143%	0.616%	0.473%	0.132%	-0.011%
13	Other	0.004%	0.004%	0.000%	0.004%	0.000%
14	Total Retail	100.000%	100.000%	0.000%	100.000%	0.000%

**Duke Energy Kentucky
Case No. 2017-00321
Northern Kentucky University's First Set Data Requests
Date Received: October 27, 2017**

NKU-DR-01-012

REQUEST:

Please provide the cost of service study in Excel format with all formulas intact that was submitted by the Company in its last electric rate case, Case No. 2006-00172.

RESPONSE:

Please see NKU-DR-01-012 Attachment provided electronically on CD.

PERSON RESPONSIBLE: James E. Ziolkowski

NKU-DR-01-012
ATTACHMENT IS BEING
PROVIDED ON CD

**Duke Energy Kentucky
Case No. 2017-00321
Northern Kentucky University's First Set Data Requests
Date Received: October 27, 2017**

NKU-DR-01-013

REQUEST:

Please identify and provide a detailed description of all changes in cost of service allocation methodology proposed in this proceeding as compared to the cost of service allocation methodology used by Duke Energy Kentucky in its last rate case proceeding, Case No. 2006-00172.

RESPONSE:

Please see the Company's response to Staff-DR-02-084.

The Company revised its COSS model since the 2006 rate case. To the best of the Company's knowledge, the same allocation methodology is used in the current case as compared with the 2006 case, in accordance with the NARUC Electric Utility Cost Allocation Manual.

PERSON RESPONSIBLE: James E. Ziolkowski

**Duke Energy Kentucky
Case No. 2017-00321
Northern Kentucky University's First Set Data Requests
Date Received: October 27, 2017**

NKU-DR-01-014

REQUEST:

Reference Mr. Ziolkowski's direct testimony at page 20, line 12, which states: "Poles and conductors are also 100 percent demand." Please reconcile this statement with the proposed class cost of service study's allocation of the costs of poles and conductors to classes.

RESPONSE:

This statement is erroneous and was inadvertently included from an early draft of the testimony. This statement should be deleted.

Poles and conductors are allocated to the classes using both customer and demand allocation factors.

PERSON RESPONSIBLE: Jim Ziolkowski