

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF DUKE)
ENERGY KENTUCKY, INC. TO AMEND ITS) CASE NO.
DEMAND SIDE MANAGEMENT PROGRAMS) 2017-00324

ATTORNEY GENERAL’S SUPPLEMENTAL DATA REQUESTS

Comes now the intervenor, the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention, and submits these Supplemental Data Requests to Duke Energy Kentucky, Inc., [hereinafter “Duke” or “Company”] to be answered by November 3, 2017, and in accord with the following:

- (1) In each case where a request seeks data provided in response to a staff request, reference to the appropriate request item will be deemed a satisfactory response.
- (2) Identify the witness who will be prepared to answer questions concerning each request.
- (3) Repeat the question to which each response is intended to refer.
- (4) These requests shall be deemed continuing so as to require further and supplemental responses if the company receives or generates additional information within the scope of these requests between the time of the response and the time of any hearing conducted hereon.
- (5) Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association, be accompanied by a signed certification of the preparer or 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.

(6) If you believe any request appears confusing, please request clarification directly from undersigned Counsel for the Office of Attorney General.

(7) To the extent that the specific document, workpaper or information as requested does not exist, but a similar document, workpaper or information does exist, provide the similar document, workpaper, or information.

(8) To the extent that any request may be answered by way of a computer printout, please identify each variable contained in the printout which would not be self-evident to a person not familiar with the printout.

(9) If the company has objections to any request on the grounds that the requested information is proprietary in nature, or for any other reason, please notify the Office of the Attorney General as soon as possible.

(10) As used herein, the words "document" or "documents" are to be construed broadly and shall mean the original of the same (and all non-identical copies or drafts thereof) and if the original is not available, the best copy available. These terms shall include all information recorded in any written, graphic or other tangible form and shall include, without limiting the generality of the foregoing, all reports; memoranda; books or notebooks; written or recorded statements, interviews, affidavits and depositions; all letters or correspondence; telegrams, cables and telex messages; contracts, leases, insurance policies or other agreements; warnings and caution/hazard notices or labels; mechanical and electronic recordings and all information so stored, or transcripts of such recordings; calendars, appointment books,

schedules, agendas and diary entries; notes or memoranda of conversations (telephonic or otherwise), meetings or conferences; legal pleadings and transcripts of legal proceedings; maps, models, charts, diagrams, graphs and other demonstrative materials; financial statements, annual reports, balance sheets and other accounting records; quotations or offers; bulletins, newsletters, pamphlets, brochures and all other similar publications; summaries or compilations of data; deeds, titles, or other instruments of ownership; blueprints and specifications; manuals, guidelines, regulations, procedures, policies and instructional materials of any type; photographs or pictures, film, microfilm and microfiche; videotapes; articles; announcements and notices of any type; surveys, studies, evaluations, tests and all research and development (R&D) materials; newspaper clippings and press releases; time cards, employee schedules or rosters, and other payroll records; cancelled checks, invoices, bills and receipts; and writings of any kind and all other tangible things upon which any handwriting, typing, printing, drawings, representations, graphic matter, magnetic or electrical impulses, or other forms of communication are recorded or produced, including audio and video recordings, computer stored information (whether or not in printout form), computer-readable media or other electronically maintained or transmitted information regardless of the media or format in which they are stored, and all other rough drafts, revised drafts (including all handwritten notes or other marks on the same) and copies of documents as hereinbefore defined by whatever means made.

(11) For any document withheld on the basis of privilege, state the following: date; author; addressee; indicated or blind copies; all persons to whom distributed, shown, or explained; and, the nature and legal basis for the privilege asserted.

(12) In the event any document called for has been destroyed or transferred beyond the control of the company, please state: the identity of the person by whom it was destroyed or transferred, and the person authorizing the destruction or transfer; the time, place, and method of destruction or transfer; and, the reason(s) for its destruction or transfer. If destroyed or disposed of by operation of a retention policy, state the retention policy.

(13) Provide written responses, together with any and all exhibits pertaining thereto, in one or more bound volumes, separately indexed and tabbed by each response, in compliance with Kentucky Public Service Commission Regulations.

(14) “And” and “or” should be considered to be both conjunctive and disjunctive, unless specifically stated otherwise.

(15) “Each” and “any” should be considered to be both singular and plural, unless specifically stated otherwise.

Respectfully submitted,

ANDY BESHEAR
ATTORNEY GENERAL



KENT A. CHANDLER
REBECCA W. GOODMAN
JUSTIN M. MCNEIL
ASSISTANT ATTORNEYS GENERAL
700 CAPITAL AVE., SUITE 20
FRANKFORT KY 40601-8204
(502) 696-5453
Kent.Chandler@ky.gov
Rebecca.Goodman@ky.gov
Justin.McNeil@ky.gov

THIS PAGE INTENTIONALLY LEFT BLANK

Electronic Application Of Duke Energy Kentucky, Inc.
To Amend Its Demand Side Management Programs
Case No. 2017-00324
Attorney General's Supplemental Data Requests

1. Refer to the Company's response to AG-DR-01-001, wherein Duke objected to answering the portion relating to MW impact, on the basis that "the information does not exist."
 - a. Why does this information not exist?
 - b. If the answer to (a), above, is that the information is not ascertainable, explain why it should be used as a metric when projecting DSM impacts when it is unable to be confirmed after the fact.

2. Refer to the Company's response to AG-DR-01-003, wherein Duke stated that a 5% RPS by 2028 is reasonable.
 - a. Confirm that the request notes that the 2014 IRP assumed 5% of retail sales would be met with renewable energy beginning in 2019, and increasing into 2028.
 - b. Confirm that the response provided states that a 5% RPS by 2028 is reasonable.
 - c. Reconcile the response to AG-DR-01-003 with the quote from the 2014 IRP, given that they seem to indicate two different timelines.

3. Refer to the Company's response to AG-DR-01-004, wherein Duke objected to the request "because it is not appropriate to compare the projection in the 2014 IRP . . . to the actual performance" of the DSM portfolio.
 - a. Considering the objection made by Duke, provide the Attorney General with the information Duke deems as proper to compare against the performance of the "dynamic" DSM programs in determining whether the programs still provide a net benefit to the Company's customers.
 - b. Considering the objection made by Duke in response to AG-DR-01-004, does the Company believe it should be the arbiter of what information should or should not be used to determine the reasonableness of the programs it implements and profits from?

4. Refer to the Company's response to AG-DR-01-005. Confirm that the amounts listed in the third column under the title, "Purchased Power from PJM" are designated as "Revenue." Do these amounts represent revenue to Duke? If so, why?

Electronic Application Of Duke Energy Kentucky, Inc.
To Amend Its Demand Side Management Programs
Case No. 2017-00324
Attorney General's Supplemental Data Requests

5. Refer to the Company's response to AG-DR-01-008(b). Does the Company anticipate filing amended tariff sheets Nos. 62 and 78, on or before November 15, 2017?

6. Refer to the Company's response to AG-DR-01-011(c). In responding with "unknown", is Duke stating that it has received previous permission from the Commission to change the PI amount but does not know in what case or matter Commission approval was received? Explain the response, "unknown", in complete detail.