

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC ANNUAL COST RECOVERY)
FILING FOR DEMAND SIDE MANAGEMENT) CASE NO.
BY DUKE ENERGY KENTUCKY, INC.) 2017-00427

ATTORNEY GENERAL'S SUPPLEMENTAL DATA REQUESTS

Comes now 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 the date provided by Commission Order, 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



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Electronic Annual Cost Recovery Filing For
Demand Side Management By Duke Energy Kentucky, INC.
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1. Provide an updated response to the Attorney General's Initial Data Requests, item 7, to include all months for which data is now available.
2. Is Duke aware of any other utility whose residential DSM costs represent more than 7% of the average residential customers' bill? If so, please identify.
3. Refer to the direct testimony of Timothy J. Duff, pages 5-6.
 - a. Would Duke implement a DSM program without a provision for an "incentive" for the company to "offer these programs?"
 - b. Provide the likelihood of Duke having to make investments in expensive generating resources over a 5, 10 and 15-year time horizon, as described on page 6.
 - c. Confirm the off-system sales Duke makes are shared with Duke through the Rider PSM.
 - d. Confirm that as described on pages 5-6, Duke's previous DSM suite provides, directly or indirectly, for: 1) recovery of cost of providing EE/DSM programs, 2) insulation from lost margins due to reduction in sales volume, 3) an incentive for Duke to offer the programs, and 4) Duke to receive a share of off-systems sales through the potential sale of excess power into wholesale markets.
4. Refer to the direct testimony of Timothy J. Duff, page 20.
 - a. Provide support for the statement that, "the cost to maintain the annual resource associated with the program is less [than] \$300 thousand per year."
 - i. Any response should be broken out by specific cost types and whether each cost is one-time or ongoing. Provide any and all responses in native electronic format.
 - b. Provide support for the position that terminating Power Manager would incur costs in excess of \$1 million.
 - i. Any response should be broken out by specific cost types and whether each cost is one-time or ongoing. Provide any and all responses in native electronic format.
5. Refer to the direct testimony of John A. Verderame, pages 24-25.
 - a. Provide table 2, but include the capacity of Duke's new solar project.
 - b. Does Duke expect any new generation capacity that is not already assumed by table 2 to be in service by December 31, 2021?

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- c. Does Duke have the information necessary to provide additional years to table 2? If so, please provide same.
 - d. Are any EE/DSM programs used in FRR plans other than PowerShare or PowerManager?
6. Refer to the direct testimony of John A. Verderame, pages 26-27.
- a. Provide an explanation of the statement “While the Company can theoretically purchase capacity from outside the PJM footprint, deliverability constraints of imports significant limit this option.” Any explanation should specifically address whether deliverability is a problem in the event Duke purchases capacity from the south or west of its system, particularly from other PSC-jurisdictional utilities.
7. Refer to the direct testimony of John A. Verderame, pages 34-35. Provide an explanation of the terms used in the keys of the graphs.