

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 INITIAL DATA REQUESTS

Comes now the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention, and submits these Initial 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.
Case No. 2017-00427
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1. Refer to the IRP in Case No. 2014-00273. The Company noted that its annual planning reserve margin was 13.7% percent.
 - a. Has this planning reserve margin changed since the Company's 2014 IRP?
 - b. What is the actual reserve margin by year from 2013-2016 and expected reserve margin for years 2017-2020?
 - c. What is Duke's current target reserve margin?
2. Provide the amount of off-system sales by Duke for each year since 2013, by energy and dollar amounts. Provide these amounts by total annual off-systems sales and by off-systems sales net off-system purchases. Explain, in complete detail, any increase or decrease of these amounts of 50% or more as compared to the prior year.
3. For any off-system sales that Duke makes, are any portion of the sales returned to customers?
 - a. If "yes": (i) what portion of the sales is returned to customers, and what portion does Duke retain and (ii) how is any portion of off-system sales returned to customers?
 - b. If Duke has an existing formula and provides such formula in response to (a), above, provide the genesis of that formula and explain whether the Company has requested or plans to request Commission approval to alter that formula.
4. Provide any and all workpapers and analyses used to produce the documents, charts, tables, figures, studies, exhibits and appendices provided in the Company's November 15, 2017 filing. To the extent the responsive documents are in Excel, provide such workpapers electronically, with formulas and calculations intact.
5. Explain, in complete detail, why the number of customers served by the Low Income Services Program- Weatherization, has been significantly lower in years 2013-2014 and 2015-2017, as compared to other years in the past decade. Provide the costs for this program between the years 2011 and 2017.
6. Refer to page 49 of the Application, paragraph 134. Does the \$19.23 million represent the amount recovered from customers for the past reporting period, or the costs of the program from that same period. Provide a breakout of that amount detailing same.
7. Provide the amount the average electric residential customer paid via the DSM surcharge in the past reporting period, the expected amount for calendar year 2017,

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and the actual amount paid for years 2010-2016. For the same time periods, provide the average total residential electric bill, including base rates, all surcharges, and riders. This information should reasonably lead to the ability to calculate what percentage of the total electric residential bill that DSM charges represent for the average Duke customer.