COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In The Matter of:

THE ELECTRONIC APPLICATION OF)	
DUKE ENERGY KENTUCKY, INC., FOR)	
AUTHORITY TO 1) ADJUST NATURAL)	Case No. 2018-00261
GAS RATES 2) APPROVAL OF A)	
DECOUPLING MECHANISM 3))	
APPROVAL OF NEW TARIFFS; 4) ALL)	
OTHER REQUIRED APPROVALS,)	
WAIVERS, AND RELIEF)	

MOTION FOR CONFIDENTIAL TREATMENT OF DUKE ENERGY KENTUCKY, INC. FOR CERTAIN RESPONSES TO COMMISSION STAFF'S POST HEARING REQUESTS FOR INFORMATION

Comes now Duke Energy Kentucky, Inc. (Duke Energy Kentucky or Company), by counsel, pursuant to 807 KAR 5:001, Section 13 and other law, and respectfully requests the Commission to classify and protect certain information provided by the Company in its Responses to Commission Staff's Post Hearing Requests for Information issued on February 8, 2019, respectfully stating as follows:

- On August 1, 2018 Duke Energy Kentucky filed a Notice of Intent to File an Application seeking adjustment of its electric rates and other approvals.
- On August 31, 2018 Duke Energy Kentucky filed an Application seeking an adjustment of its natural gas rates and other approvals.
- On February 5, 2019 Duke Energy Kentucky appeared before the Commission for its public hearing.

- On February 8, 2019 Commission Staff issued its Post Hearing Requests for Information to Duke Energy Kentucky.
- In response to Commission Staff's Post Hearing Requests for Information, Duke
 Energy Kentucky is providing certain information for which it requests confidential treatment.
- 6. The information for which Duke Energy Kentucky seeks confidential treatment is contained in its Response to Request No. 29, which is referred to herein as the "Confidential Information" and, broadly speaking, includes detailed salary and wage increases of Duke Energy Kentucky employees.
- Request No. 29 of Commission Staff's Post Hearing Requests for Information states as follows:

Refer to the Direct Testimony of Lane Kollen, page 19. Provide Duke Kentucky's and its affiliates' salary and wage increases for calendar years 2015 through 2018, the base period and the forecasted test period.

- 8. In its response to Request No. 29, Duke Energy Kentucky is providing a copy of the schedule of annual wage increases for Duke Energy Kentucky and its affiliates. Salary and benefit information is personal and private information and should not be in the public realm.
- 9. The Kentucky Open Records Act and applicable precedent exempts the Confidential Information from disclosure. See KRS 61.878(1)(a); KRS 61.878(1)(c)(1); Zink v. Department of Workers Claims, Labor Cabinet, 902 S.W.2d 825 (Ky. App. 1994); Hoy v. Kentucky Industrial Revitalization Authority, 907 S.W.2d 766, 768 (Ky. 1995). The Confidential Information includes information regarding benefit amounts for Duke Energy Kentucky employees. Benefit information is personal and private information and should not be in the public realm. Additionally, public disclosure of these sensitive documents would unnecessarily provide interested parties and Duke Energy Kentucky's competitors with access to exclusive information

regarding employee compensation. By knowing what Duke Energy Kentucky compensates each of its employees, it would be very easy for other utilities to attempt to poach Duke Energy Kentucky's workforce and management. Such public disclosure could unfairly harm Duke Energy Kentucky's competitive position in the marketplace for utility management and a skilled workforce, to the detriment of Duke Energy Kentucky and its customers. For these reasons, the Confidential Information satisfies both the statutory and common law standards for affording confidential treatment. Indeed, the Commission has already recognized the confidential nature of the Confidential Information and has afforded confidential treatment to similar compensation and wage documents in prior proceedings.¹

- 10. Furthermore, the information for which Duke Energy Kentucky is seeking confidential treatment was either developed internally, or acquired on a proprietary basis, by Duke Energy Corporation and Duke Energy Kentucky personnel, is not on file publicly with any public agency, and is not publicly available from any commercial or other source. The aforementioned information is distributed within Duke Energy Kentucky only to those employees who must have access for business reasons, and is generally recognized as confidential and proprietary in the utility industry.
- 11. Duke Energy Kentucky does not object to limited disclosure of the Confidential Information described herein, pursuant to an acceptable protective agreement entered into with any intervenors with a legitimate interest in reviewing the same for the sole purpose of participating in this case.

¹ <u>Id.</u> See also, In the Matter of the Application of Kentucky Utilities Company for an Adjustment of its Electric Rates, Order, Case No. 2014-00371 (Ky. P.S.C., Jan. 29, 2016).

- 12. In accordance with the provisions of 807 KAR 5:001, Section 13(2)(e), the Company is filing one copy of the Confidential Information separately under seal, and the appropriate number of copies with the Confidential Information redacted.
- 13. Duke Energy Kentucky respectfully requests that the Confidential Information be withheld from public disclosure for a period of twenty years. This will assure that the Confidential Information if disclosed after that time will no longer be commercially sensitive so as to likely impair the interests of the Company if publicly disclosed.
- 14. To the extent the Confidential Information becomes generally available to the public, whether through filings required by other agencies or otherwise, Duke Energy Kentucky will notify the Commission and have its confidential status removed, pursuant to 807 KAR 5:001 Section 13(10)(a).

WHEREFORE, Duke Energy Kentucky, Inc., respectfully requests that the Commission classify and protect as confidential the specific information described herein.

Respectfully submitted,

Rocco O. D'Ascenzo (92796)

Deputy General Counsel

Duke Energy Business Services LLC 139 East Fourth Street, 1303-Main

Cincinnati, Ohio 45201 Phone: (513) 287-4320 Fax: (513) 287-4385

E-mail: rocco.d'ascenzo@duke-energy.com

and

David S. Samford L. Allyson Honaker GOSS SAMFORD, PLLC 2365 Harrodsburg Road, Suite B-325 Lexington, KY 40504 (859) 368-7740

Email: David@gosssamfordlaw.com Email: Allyson@gosssamfordlaw.com

Counsel for Duke Energy Kentucky, Inc.

CERTIFICATE OF SERVICE

This is to certify that the foregoing electronic filing is a true and accurate copy of the document being filed in paper medium; that the electronic filing was transmitted to the Commission on February 22, 2019; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and that a copy of the filing in paper medium will be delivered to the Commission within two business days and a copy of the filing is also being emailed to the following:

Hon. Rebecca W. Goodman

Hon. Larry Cook Hon. Kent Chandler

Counsel for Duke Energy Kentucky, Inc.

STATE OF OHIO)	
)	SS:
COUNTY OF HAMILTON)	

The undersigned, Bruce L. Sailers, Pricing and Regulatory Solutions Manager, being duly sworn, deposes and says that he has personal knowledge of the matters set forth in the foregoing post-hearing data requests and that the answers contained therein are true and correct to the best of his knowledge, information and belief.

Bruce L. Sailers, Affiant

Subscribed and sworn to before me by Bruce L. Sailers, on this 137 day of Lebeusky, 2019.

ADELE M. FRISCH
Notary Public, State of Ohio
My Commission Expires 01-05-2024

NOTARY PUBLIC

My Commission Expires: 1/5/2024

adelin Frisch

STATE OF OHIO)	
)	SS:
COUNTY OF HAMILTON)	

The undersigned, Cindy Givens, Senior Products & Services Specialist, being duly sworn, deposes and says that she has personal knowledge of the matters set forth in the foregoing post-hearing data requests, and that the answers contained therein are true and correct to the best of her knowledge, information and belief.

Cindy Givens, Affiant

Subscribed and sworn to before me by Cindy Givens on this 13th day of bruary, 2019.

NOTARY PUBLIC

My Commission Expires: July 8,2022

E. M. Nota

E. MINNA ROLFES-ADICINS
Notary Public, State of Ohio
My Commission Expires
July 8, 2022

STATE OF OHIO)	
)	SS:
COUNTY OF HAMILTON)	

The undersigned, Trisha Haemmerle, Senior Strategy & Collaboration Manager, being duly sworn, deposes and says that she has personal knowledge of the matters set forth in the foregoing post-hearing 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 Haemmerle of this February, 2019.

.....

My Commission Expires: July 8,2022

E. MIMMA ROLFES-ADKINS
Notary Public, State of Ohio
My Commission Expires
July 8, 2022

STATE OF OHIO)	
)	SS:
COUNTY OF HAMILTON)	

The undersigned, Amy B. Spiller, State President of Duke Energy Ohio, Inc. and its subsidiary, Duke Energy Kentucky, Inc., being duly sworn, deposes and says that she has personal knowledge of the matters set forth in the foregoing post-hearing data requests and that the answers are true and correct to the best of her knowledge, information and belief.

Subscribed and sworn to before me by Amy B. Spiller, on this 20 day of FEBRUARY, 2019.

Notary Public, State of Ohio My Commission Expires 01-05-2024

My Commission Expires: 1/5/2024

STATE OF OHIO)	
)	SS:
COUNTY OF HAMILTON)	

The undersigned, Ryan C. Champness, CSS Senior Business Analyst, being duly sworn, deposes and says that he has personal knowledge of the matters set forth in the foregoing post-hearing data requests, and that the answers contained therein are true and correct to the best of his knowledge, information and belief.

Ryan C. Champness, Affiant

Subscribed and sworn to before me by Ryan C. Champness on this 13 day of Ebruary, 2019.

NOTARY PUBLIC

My Commission Expires: Wly 6,2022



STATE OF OHIO)	
)	SS:
COUNTY OF HAMILTON)	

The undersigned, Mark T. Davis, Sr., Development Assignment Leader, being duly sworn, deposes and says that he has personal knowledge of the matters set forth in the foregoing post-hearing data requests, and that the answers contained therein are true and correct to the best of his knowledge, information and belief.

Mark T. Davis, Sr., Affiant

Mark Dais St.

Subscribed and sworn to before me by Mark T. Davis, Sr. on this day of

_, 2019.

SHANNON L. WALL Notary Public, North Carolina Mecklenburg County My Commission Expires June 28, 2022 NOTARY PUBLIC

My Commission Expires: (2/28/22)

STATE OF NORTH CAROLINA)	
C 11 C 1)	SS:
COUNTY OF Guilford)	

The undersigned, Tyler A. Barbare, Director of Gas Technical Field Operations, being duly sworn, deposes and says that he has personal knowledge of the matters set forth in the foregoing post-hearing data requests and that the answers contained therein are true and correct to the best of his knowledge, information and belief.

Tyler A. Barbare Affiant

Subscribed and sworn to before me by Tyler A. Barbare on this 13th day of

Melusa Pennington Stoffman NOTARY PUBLIC

My Commission Expires: 12/16/2019

STATE OF OHIO)	
)	SS:
COUNTY OF HAMILTON)	

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 18th day of February, 2019.

NOTARY PUBLIC

My Commission Expires: July 8,2022



E. MINNA ROLFES-ADKINS Notary Public, State of Ohio My Commission Expires July 8, 2022

STATE OF NORTH CAROLINA)	
)	SS:
COUNTY OF MECKLENBURG)	

The undersigned, John L. Sullivan, III, Director, Corporate Finance and Assistant Treasurer, being duly sworn, deposes and says that he has personal knowledge of the matters set forth in the foregoing post-hearing data requests, and that the answers contained therein are true and correct to the best of his knowledge, information and belief.

John L. Sullivan, III Affiant

Subscribed and sworn to before me by John L. Sullivan, III on this 18 day of February, 2019.



Teather Paige plum NOTARY PUBLIC

My Commission Expires: 1-9-2023

STATE OF NORTH CAROLINA)	
)	SS
COUNTY OF MECKLENBURG)	

The undersigned, Nicholas Giaimo, Director, RU Gas Operations Fiance, being duly sworn, deposes and says that he has personal knowledge of the matters set forth in the foregoing post-hearing data requests, and that the answers contained therein are true and correct to the best of his knowledge, information and belief.

Nicholas Giaimo Affiant

Subscribed and sworn to before me by Nicholas Giaimo on this Htm day of February, 2019.

My Commission Expires: 11 29 2021

STATE OF OHIO)	
)	SS:
COUNTY OF HAMILTON)	

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 post-hearing 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 127th day of

Notary Public, State of Ohio My Commission Expires 01-05-2024

Qdele M. Frisch

NOTARY PUBLIC

My Commission Expires: 1/5/2024

STATE OF NORTH CAROLINA)	
)	SS:
COUNTY OF MECKLENBURG)	

The undersigned, Renee Metzler, Managing Director - Retirement and Health and Welfare, being duly sworn, deposes and says that she has personal knowledge of the matters set forth in the foregoing post-hearing data requests and that the answers contained therin are true and correct to the best of her knowledge, information and belief.

Renee Metzler Affiant

Subscribed and sworn to before me by Renee Metzler on this // day of flywary

2019.

My Commission Expires:



STATE OF OHIO)	
)	SS:
COUNTY OF HAMILTON)	

The undersigned, Gary J. Hebbeler, Vice President Gas Operations, being duly sworn, deposes and says that he has personal knowledge of the matters set forth in the foregoing posthearing data requests and that the answers contained therein are true and correct to the best of his knowledge, information and belief.

Jany / Helbelen Gary J. Hebbeler, Affiant

Subscribed and sworn to before me by Gary J. Hebbeler on this 1974 day of February 2019.

ADELE M. FRISCH Notary Public, State of Ohio My Commission Expires 01-05-2024

My Commission Expires: 1/5/2024

STATE OF NORTH CAROLINA)	
)	SS:
COUNTY OF MECKLENBURG)	

The undersigned, Joseph R. Thomas, Director Enhanced Customer Solutions, being duly sworn, deposes and says that he has personal knowledge of the matters set forth in the foregoing post-hearing data requests, and that the answers contained therein are true and correct to the best of his knowledge, information and belief.

Joseph R. Thomas, Affiant

Subscribed and sworn to before me by Joseph R. Thomas on this 21 day of February, 2019.

TAMARA ANTHONY-HACKETT

Notary Public Union Co., North Carolina My Commission Expires Sep 19,2023

My Commission Expires: & 4 19, 2023

STATE OF INDIANA)	
)	SS:
COUNTY OF HENDRICKS)	

The undersigned, Suzanne Kesling., Director Customer Journey Process, being duly sworn, deposes and says that she has personal knowledge of the matters set forth in the foregoing post-hearing data requests, and that the answers contained therein are true and correct to the best of her knowledge, information and belief.

Suzanne Kesling., Affiant

Subscribed and sworn to before me by Suzanne Kesling, on this 2/5 day of

February, 2019.

SEAL SEAL

My Commission Expires: Jeb. 15, 2024

STATE OF NORTH CAROLINA)	
)	SS:
COUNTY OF MECKLENBURG)	

The undersigned, Benjamin Walter Bohdan Passty, Lead Load Forecasting Analyst, being duly sworn, deposes and says that he has personal knowledge of the matters set forth in the foregoing post-hearing data requests and that the answers contained therein are true and correct to the best of his knowledge, information and belief.

Benjamin Walter Bohdan Passty Affiant

Subscribed and sworn to before me by Benjamin Walter Bohdan Passty on this day of February, 2019.

MICHAEL SZUPER
Meddenburg County
My Commission Expires
July 29, 2023

NOTAKT TODLIC

My Commission Expires: July 29, 2023

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Staff First Set Post Hearing Data Requests

Date Received: February 8, 2019

STAFF-POST HEARING-DR-01-001

REQUEST:

Confirm whether Duke Kentucky's current monthly customer charge of \$16.00 includes

the Home Energy Assistance (HEA) Program \$0.10-per-meter fee. If not, explain how the

Home Energy Assistance Program fee is billed and provide a copy of the billing format.

RESPONSE:

The current gas service customer charge for Rate RS is \$16.00. The current charge for the

Home Energy Assistance Program is \$0.10 per service. These two charges are combined

under the heading of Customer Charge with the total amount equal to \$16.10 for a gas

service Rate RS customer with one gas service. The billing format is included as an

attachment to STAFF-POST HEARING-DR-01-023.

PERSON RESPONSIBLE:

Bruce L. Sailers

Staff First Set Post Hearing Data Requests

Date Received: February 8, 2019

STAFF-POST HEARING-DR-01-002

REQUEST:

Duke Kentucky's HEA Program charges residential customers \$0.10 for each gas and each

electric meter, and for the most recently reported period collected approximately \$109,000

from gas customers and \$152,000 from electric customers. State the amount, in dollars or

cents per meter, matched or contributed by Duke Kentucky annual to the HEA Program.¹

RESPONSE:

Duke Energy Kentucky's HEA program is administered with and under its WinterCare

program. Like WinterCare, the HEA program is administered by Northern Kentucky

Community Action Commission (NKCAC). The HEA funds are available for income-

qualifying customers once other low-income program funds (i.e. LIHEAP and WinterCare)

are either used or are not available to the customer. Duke Energy contributes \$25,000

annually for WinterCare and will also match dollar-for-dollar up to \$25,000 in customer

contributions annually for a total of \$50,000 of Company dollars for bill assistance.

PERSON RESPONSIBLE:

Cindy Givens

Trisha Haemmerle

¹ Case No. 2018-00370, Electronic Annual Cost Recovery Filing For Demand Side Management By Duke Energy Kentucky, Inc. (filed Nov. 15, 2018).

Staff First Set Post Hearing Data Requests

Date Received: February 8, 2019

STAFF-POST HEARING-DR-01-003

REQUEST:

Provide a breakdown of expenses, including administrative costs, for the HEA Program in

2018.

RESPONSE:

For the assistance programs administered by NKCAC, on average, administrative costs per

voucher equals \$40.45. This takes into account all direct salaries, space, supplies, and other

administrative costs. NKCAC's administrative costs include time associated with

determining the customer's eligibility (e.g., income, crisis), determine crisis amount to

avoid disconnection or reconnection, work with the utility company on the customer's

behalf, provide client education regarding budgeting and energy conservation measures

that may help avoid future crisis situations, and process the customer's voucher for

payment. Because the HEA program is a crisis assistance program, clients must be

processed individually resulting in a greater cost. This is unlike a subsidy program where

the administering agency oftentimes can determine clients' eligibility and process

applicants in bulk at a lower overall cost.

PERSON RESPONSIBLE:

Cindy Givens

Staff First Set Post Hearing Data Requests

Date Received: February 8, 2019

STAFF-POST HEARING-DR-01-004

REQUEST:

In Case No. 2008-00100, the Commission entered an Order on September 25, 2008, that

approved Duke Kentucky's request to reinstate the HEA Program but stated a concern with

the proposed 15 percent level of cost to be charged by the Northern Kentucky Community

Action Commission (NKCAC) to administer the HEA Program. That Order also directed

Duke Kentucky to file annual progress reports setting forth specific information related to

its HEA Program, including "NKCAC's actual administrative costs associated with the

HEA Program." Since then, Duke Kentucky's annual progress reports disclose the amount

of the administrative costs of the HEA Program, and those costs are approximately 15

percent of the HEA funds distributed to customers.

a. State whether the administrative costs reported by Duke Kentucky in its annual

progress reports are the administrative costs incurred by Duke Kentucky to have

NKCAC administer the HEA Program, or whether the reported administrated costs

are NKCAC's actual administrative costs associated with the HEA Program.

b. If the reported administrative costs are NKCAC's actual administrative costs

associated with the HEA Program, provide all documents in Duke Kentucky's

possession that demonstrate NKCAC's actual administrative costs to administer the

Duke Kentucky HEA Program. If Duke Kentucky does not possess such

¹ Case No. 2008-00100, Application of Duke Energy Kentucky, Inc. to Reinstitute a Home Energy Assistance Program (Ky. PSC Sept. 25, 2008).

documents, explain in detail the basis for Duke Kentucky's belief that paying an

administrative fee of 15 percent is reasonable.

RESPONSE:

The administrative cost is that of NKCAC to administer the HEA program.

b. Please see STAFF-POST HEARING-DR-01-004 Attachment. As the Company

explained in Case No. Case No. 2011-109,2 with respect to the administration cost,

state and federal funding guidelines prevent NKCAC from using federal dollars to

operate anything other than the respective state or federally funded programs.

NKCAC is required to be ever mindful of proper allocation of cost in administering

various programs in order to maintain its funding for all programs. NKCAC closely

monitors and controls program costs to ensure that its staffing and office

operational costs are held to the minimum amount possible to administer the

LIHEAP, WinterCare, and HEA programs. Time and material costs associated with

administering the HEA program are allocated to the program as incurred. NKCAC

invoices Duke Energy Kentucky on a monthly basis for their administrative costs

incurred up to the budgeted amount. NKCAC's actual monthly administrative costs

are determined by the time and material spent administering the program to eligible

customers.

PERSON RESPONSIBLE:

Cindy Givens

Trisha Haemmerle

² In Re: Application of Duke Energy Kentucky, Inc. to Continue its Home Energy Assistance Program, Case No. 2011-109, STAFF-DR-01-004.



May 30, 2018



COVINGTON OFFICE 717 Madison Avenue Covington KY, 41011

PHONE 859 581-6607 800 783-6607

FAX 859 **6**55-2949

WEB SITE www.nkcac.org To whom it may concern:

This letter is to describe the "administrative costs" category for the Duke Energy Home Energy Assistance Program (HEA). We have been granted a 15 percent rate from the Public Service Commission since the program was established. While the descriptive language is "administration" the costs are actually the cost of providing the service. Staff time and space for providing the HEA eligibility determination along with a full assessment of the client's needs so that other services may be accessed according to the situation. The only truly administrative costs within this line item is the accounting services, which we call Indirect Costs. That amount is based on salaries, and makes up a small percent- approximately 6% of the total administrative category.

I hope this clears up the confusion about this line item in the Duke Energy DSM program budget. If not, please do not hesitate to contact me or Dawn Fogarty with any additional questions you may have.

Sincerely,

Robert Williams

Interim Executive Director



Duke Energy Inc

PO Box 1006 Charlotte, NC 28201

July - 2017

NKCAC

Please remit payment to:

717 Madison Avenue Covington, KY 41011

Select One...

(704) 382-0209

EC2ZA,

Customer

Name

Address

Phone

Qty

Comments
Name
CC#

Expires

City

Invoice No. 17-001

ī	Misc	
	Date	8/29/2017
	Order No. Rep FOB	
	Unit Price	TOTAL
		\$ 7,123.29
Tax Rate(s)	SubTotal Shipping	\$ 7,123.29
	TOTAL	\$ 7,123.29

Office Use Only

Northern Kentucky Community Action Commission, Inc. 717 Madison Avenue Covington, KY 41011

Thank You

Description

HEA Admin fee - 15% of funds spent in JULY 2017

\$47,488.62 distributed

NORTHERN KENTUCKY COMMUNITY ACTION COMMISSION DUKE HEA 2017-2018

2016 - 2017									
Month	Deposited Funds	Funds Spent	Admin. Cost	deposit	sub total	Total spent	balance	Families Assisted	Per Family
Balance Forward	180:00					THE BUSINESS	\$93,462.23		
July	- 921,380,16	A 350 198 08	\$8,429.71	\$21,380.10	\$114,822.33	\$84,627.77	\$50,194.56	263	\$213.8
August	\$26375.80	135 540 A9	\$5,331.07	\$21,375.30	\$71,569.86	\$40,871.56	\$30,698.30		\$212.83
September	\$3 (400.80	322,677,10	\$3,371.57	\$21,400.60	\$52,098.90	\$25,848.67	\$26,250.23	101	\$222.50
October	821,432,80	4 Str. 85121	\$1,657.68	\$21,447.80	\$47,698.03	\$12,708.89	\$34,989.14	167 101 62	\$178.2
November	\$21,899,80	1 1000000	\$1,282.87		\$56,488.94	\$9,912.00		76	\$113.4
December	\$2,9500120	\$13,078.48	\$2,051.77		\$68,183.14	\$15,730.25		113 22 24	\$121.0
January	\$2.C853010	WW.837.48	\$725.58		\$74:105.99	35,582:76	\$68,543,23	27	\$179.15
February	32162000	N. 2013012 1233-42	\$1,835.01	\$21,520.70	\$90,063.93	\$14,068,43		>46	\$179.90
March	\$21,878.90	发育或 的	\$2,925.87	\$21,676.90	\$97,872.40	\$22,431.67		M	
April	121,500	4 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7	\$2,647.17	\$21,589.40	\$96,810.13	\$20,294.99			
May	324 950 00		\$4,557.59		\$98,166.03	\$34,941.53	\$63,224.50		\$203.92
June	182m019100	10521/166	\$5,288.40		\$84,884.50	\$40,529.08	\$44,335.42		\$193.64
TOTALS	\$258,400.80	8267,415.31	\$40,112.30	\$258,400.80	\$952,544.17	\$307,527.61		1,410	\$189.68
		-	-			PROOFS	-		
			-			\$44,335.42		-	-
	-+			-		\$44,335.42			
2017 - 2018									
Month	Deposited Funds	Funds Spent	Admin. Cost	deposit	sub total	Total spent	balance	Families Assisted	Per Family
Balance Forward	\$0.00					100000	\$44,335.42		C. C
July	\$21,612.70	\$47,488,82	\$7,123.29	\$21,612.70	\$65,948.12	\$54,611.91	\$11,336.21		\$214.88
August	2 4 20 70 70 70 70 70 70 70 70 70 70 70 70 70	80.08	\$0.00	\$0.00	\$11,336.21	\$0.00			
September	\$0.00	80.00 80/00	\$0.00	\$0.00	\$11,338.21	\$0.00			#DIV/01
October		Secure of the second	\$0.00	\$0.00	\$11,338.21	\$0.00			#DIV/01
November	ACC SO	900 900 1000	\$0.00	\$0.00	\$11,336.21	\$0.00			#DIV/0!
December	V-1000	\$8.00	\$0.00			\$0.00			#DIV/OI
January	78000	100,000	\$0.00	\$0.00	\$11,336.21	\$0.00			10/ViCI#
February		3000 3000	\$0.00			\$0.00			#DIV/01
March	HI WAS A SECRET SECOND	\$0.00	\$0.00			\$0.00			#DIV/OI
April	100	30.00	\$0.00			\$0.00			#DIV/01
May	The state of the s	P)	\$0.00			\$0.00			#DIV/01
June	100	\$0.00	\$0.00	\$0.00	\$11,336.21	\$0.00	\$11,336.21	0	#DIV/0I
TOTALS	\$21,612.70	\$47,488.62	\$7,123.29	821,612.70	\$190,848,41	\$54,611,91		221	\$214.8



Invoice No. 17-002

			A CORNER CONTROL OF	
Customer			Misc	
Name	*Ouke Energy Inc		Date	9/14/2017
Address City Phone	EC2ZA, PO Box 1006 Charlotte, NC 28201 (704) 382-0208		Order No. Rep FOB	
Qty	Description		Unit Price	TOTAL
	August - 2017 \$21,414.68 distributed Please remit payment to: NKCAC 717 Madison Avenue Covington, KY 41011			\$ 3,212.20
Payment	Select One	Tax Rate(s)	SubTotal Shipping	\$ 8,212.20
Comments	The same of the sa		TOTAL	\$ 3,212.20
CC # Expires	Northern Kentucky Community Act	ion Commission, Inc.	a more had be above to	
	717 Madison Ave Covington, KY 41 Thank You			

NORTHERN KENTUCKY COMMUNITY ACTION COMMISSION DUKE HEA 2017-2018

2016 - 2017 Month Balance Forward	Deposited Funds	Funda Spant	Admin. Cost	deposit	sub total	Total spent	balanca	Families Assisted	Per Family
July	621190510	\$557,08108	\$8,429.71	\$21,360.10	\$114,822,33	\$84,627.77	\$93,482 23 \$50,194.56	Mess and and Mess	\$213.68
August	\$24,376.30	\$35,540,48		\$21,375.30		\$40,871.58	\$30,698.30		\$212.82
September	\$25,400.80	382 045 10		\$21,400.60			\$26,250.23		\$222.55
October	\$21,417.80	manager 2	\$1,657.68				\$34,989.14	ALL	\$178.25
November	404 400 00	ASSESSED OF SALES	\$1,292.87	\$21,499.80		\$9,912.00	\$48,576,94		
December	(21,900 20	\$1,079.48	\$2,051.77		\$88,183.14	\$15,730.25	Mass2,452.89		
January	1-1-11-11-1-1-1-1-1-1-1-1-1-1-1-1-1-1-				\$74,105.99	\$5,562.76	\$68,543.23		\$179.15
February	\$21,620,00	44E 20E 40	\$1,835.01		\$90,063.93		\$75,995.50		\$179.90
March	201 270 000	# to school	W 100 00E 07	\$21,678.90			\$75,240.73	311	\$175.73
April	\$61,549.40	1 " " " " " " " " " " " " " " " " " " "	\$2,647.17	\$21,569.40			\$76,515.13	A. L. P. C. Strategier, S. C. S. C. S. C. S.	\$193.93
May	12 1 2 1 2 1 2 1 2 1 2 1 2 1 2 1 2 1 2		\$4,557.59				\$63,224.50		\$203.92
June	92 990.90 924.990.00	100000	\$5,286.40	\$21,640.00			\$44,335.42	182	
TOTALS	\$258,400.80	\$267,415.31	\$40,112.30	\$258,400.80	\$952,544.17	\$307,527.61		1,410	\$189.68
	+	1-1-1-1				PROOFS		-	-
					-	\$44,335.42		-	-
						\$44,335.42			
2017 - 2018					-				-
Month	Deposited Funds	Funds Spent	Admin. Cost	deposit	sub total	Total spent	balance	Families Assisted	Per Family
Balance Forward	\$0.00	T drives diponi		-	000		\$44,335.42		4
July	VXIII2161270	347Mm702	\$7,123.29	\$21,612.70	\$65,948.12	\$54,611.91	\$11,338.21	1,901	\$214.88
August	Value of the SO	(2) (3) (3) (3)	\$3,212.20			\$24,626.88	\$8,323.83	· 次数10	\$205.91
September	100 E	1190,50	\$0.00			\$0.00	\$8,323.83	STORY OF SHIPLE	#DIV/OI
October	TOTAL STATE		\$0.00	\$0.00	\$8,323.83	\$0.00	\$8,323.83	下。	#DIV/01
November	1000	1000	\$0.00	\$0.00	\$8,323.83	\$0.00	\$8,323.83	尼亚洲洲 10	#DIV/01
December	10.00	\$6,00	\$0.00	\$0.00	\$8,323.83	\$0.00	\$8,323.83	选标》0	#DIV/0!
January	8000	38:00	\$0.00	\$0.00	\$8,323.83	\$0.00	\$8,323.83	5.000	#DIV/OI
February	900	A 100	\$0.00	\$0.00	\$8,323.83	\$0.00	\$8,323.83	4	
March	\$000	A CHARLES STORY	\$0.00	\$0.00	\$8,323.83	\$0.00	\$8,323.83		
April	30,00	(a) (a) (a) (b)	\$0.00		\$8,323.83	\$0.00	\$8,323.83		#DIV/01
May	30.00	No. of the second	\$0.00				\$8,323.83		#DIV/01
June	1000	780.00	\$0.00	\$0.00	\$8,323.83	\$0.00	88,323.83	90	#OIV/01
TOTALS	\$43,227.20	\$68,903,30	\$10,335.50	\$43,227.20	\$182,137.09	\$79,238.80		325	\$212.01



Invoice No. 17-003

717 Madison Avenue Covington, KY 41011 INVOICE

Customer			Misc	
Name	Duke Energy Inc		Date	11/28/17
(VEITTIC	EC2ZA EC2ZA		Cate	11/20/17
Address	PO Box 1006		Account No.	HEA/October 2017
City	Charlotte NC 28201			
1	(704) 382-0209		Contact Name	Bob Williams
				859-655-2930
Quantity	Description		Price	TOTAL
	HEA Admin fee - 15% of funds spent in October 20 October 2017 \$7,497.37 distributed Please remit payment to:			\$ 1,124.61
1	NKCAC 717 Madison Avenue Covington, KY 41011	TOTAL DUI		\$ 1,124.61
Invoiced Ap	proved	01/27/ Date	3	
	Duke Energy Inc HEA/October 2017 11/28/2017	Offic	TOTAL Se Use Only	\$ 1,124.6
	Northern Kentucky Community Act 717 Madison Ave Covington, KY 41	nue	on, Inc.	

NORTHERN KENTUCKY COMMUNITY ACTION COMMISSION DUKE HEA 2017-2018

2016 - 2017			Contract of			ACCOUNT TO SERVE	1 1 7 1 1 1 1 1 1	Michigan Company	S.Coper.
Month	Deposited Funds	Funds Spent	Admin. Cost	deposit	sub total	Total apent	balance	Families Assisted	Per Family
Balance Forward	\$0.00						\$93,462.23		
July	\$21,360.10	\$66,198.08	\$8,429.71	\$21,360,10	\$114,822.33	\$64,627.77	\$50,194.56		\$213.6
August	\$21,375.30	\$35,540.49	\$5,331.07	\$21,375.30	\$71,569.86				
September	\$21,400.60	\$22,477.10	\$3,371.57	\$21,400.60	\$52,098.90				
October	\$21,447.80	\$11,051.21	\$1,857.68	\$21,447.80	\$47,698.03				
November	\$21,499.80	\$8,619.13	\$1,292.87	\$21,499.80					
December	\$21,608.20	\$13,678.48	\$2,051.77	\$21,606.20	\$68,183.14				The state of the s
January	\$21,853.10	\$4,837.18	\$725.58						The second secon
February	\$21,520.70	\$12,233.42	\$1,835.01						THE RESERVE THE PERSON NAMED IN COLUMN TWO IS NOT THE PERSON NAMED IN COLUMN TWO IS NAMED I
March	\$21,678.80	\$19,505.80							
April	\$21,569,40	\$17,647.82							
May	\$21,650.90								
June	\$21,640.00	\$35,242.68	\$5,286.40	\$21,640.00					
TOTALS	\$258,400.80	\$267,415.31	\$40,112.30	\$258,400.80	\$952,544.17	\$307,527.61		1,410	\$189.66
			0.5-5						
						PROOFS	The state of the s		
						\$44,335.42			
						\$44,335.42			
2017 - 2018									
Month	Deposited Funds	Funds Spent	Admin. Cost	deposit	sub total	Total spent	balance	Families Assisted	Per Family
Balance Forward	\$0.00		In the second		Maria Caraca		\$44,335.42		
July	\$21,612.70	\$47,488.62	\$7,123.29	\$21,612,70	\$65,948.12	\$54,611.91	\$11,336.21	221	\$214.88
August	\$21,814.50	\$21,414.68	\$3,212.20	\$21,614.50	\$32,950.71	\$24,626.88	\$8,323.83	104	\$205.91
September	\$21,609.70	\$0.00	\$0.00	\$21,609.70	\$29,933.53	\$0.00	\$29,933.53	0	#DIV/0f
October	\$21,688.70	\$7,497.37	\$1,124.61	\$21,688.70	\$51,622.23	\$8,821.98	\$43,000.25	43	\$174.36
November	\$0.00	\$0.00	\$0.00	\$0.00	\$43,000.25	\$0.00	\$43,000.25	0	#DIV/01
December	\$0.00	\$0.00	\$0.00	\$0.00	\$43,000.25	\$0.00	\$43,000.25	0	#DIV/0!
January	\$0.00	\$0.00	\$0.00	\$0.00	\$43,000.25	\$0.00	\$43,000.25	0	#DIV/0!
February	\$0.00	\$0.00	\$0.00	\$0.00	\$43,000.25	\$0.00	\$43,000.25	0	#DIV/0!
March	\$0.00	\$0.00	\$0.00	\$0.00	\$43,000.25	\$0.00	\$43,000.25	0	#DIV/OI
April	\$0.00	\$0.00	\$0.00	\$0.00		\$0.00	\$43,000.25	0	#DIV/OI
May	80.00	\$0.00	\$0.00	\$0.00	\$43,000.25	\$0.00	\$43,000.25	0	#DIV/01
June	\$0.00		\$0.00	\$0.00		\$0.00	\$43,000.25	0	#DIV/01
TOTALS	\$88,825,60	\$76,400.67	\$11,460.10	386,525.60	\$524,458,59	\$87,860,77		388	\$207.61



Invoice No. 17-004

717 Madison Avenue Covington, KY 41011

Customer			Misc	
Name	Duke Energy Inc		Date	12/11/17
	EC2ZA			THE RESERVE TO SERVE THE PARTY OF THE PARTY
Address	PO Box 1006		Account No.	HEA/November 2017
City	Charlotte NC 28201			
	(704) 382-0209		Contact Name	Bob Williams
Ou and the	Description		Price	859-655-2930
Quantity	Description HEA Admin fee - 15% of funds spent in Novembe	- 2047	Price	TOTAL
	November 2017 \$19,379.96 distributed			\$ 2,906.99
	Please remit payment to: NKCAC 717 Madison Avenue Covington, KY 41011			
111		TOTAL DU		\$ 2,906.99
Invoiced Ap	proved	Date	/	
Return wit Payment Name:	Check Duke Energy Inc		TOTAL	\$ 2,906.99
	HEA/November 2017	-		
nvoice Date	12/11/2017	Offic	e Use Only	
nt Enclosed				
		1	****	
	A commence			
	Northern Kentucky Community A 717 Madison Av Covington, KY	renue	on, Inc.	

NORTHERN KENTUCKY COMMUNITY ACTION COMMISSION DUKE HEA 2017-2018

2016 - 2017							The Control of		
Month	Deposited Funds	Funds Spent	Admin. Cost	deposit	sub total	Total spent	balance	Families Assisted	Per Family
Balance Forward	\$0.00					THE PERSON	\$93,462.23		
July	\$21,360 10	\$56,198.06	\$8,429.71	\$21,360.10	\$114,822.33	\$64,627.77	\$50,194.56	263	\$213.68
August	\$21,375.30	\$35,540.49	\$5,331.07	\$21,375.30	\$71,569.86	\$40,871.56	\$30,698.30	167	\$212.82
September	\$21,400,60	522 477 10	\$3,371.57	\$21,400.60	\$52,098.90	\$25,848.67	\$26,250.23	101	\$222.55
October	\$21,447.80	\$11,051.21	\$1,657.68	\$21,447.80	\$47,698.03	\$12,708.89	\$34,989.14	62	\$178.28
November	\$21,499.80	\$8,619,13	\$1,292.87	\$21,499.80	\$56,488.94	\$9,912.00	\$46,576.94	76	\$113.41
December	\$21,606 20			\$21,606.20	\$68,183.14	\$15,730.25			
January	\$21,653.10	\$4,837 18	\$725.58	\$21,653.10	\$74,105.99	\$5,562.76	\$68,543.23	27	
February	\$21,520.70	\$12,233.42	\$1,835.01	\$21,520.70	\$90,083.93	\$14,068.43	\$75,995.50	66	\$179.90
March	\$21,676.90	\$19.505!80	\$2,925.87	\$21,676.90	\$97,672.40	\$22,431.67	\$75,240.73	111	\$175.73
April	\$21,569.40	\$17,647.82	\$2,647.17	\$21,569.40	\$96,810.13	\$20,294.99			
May	\$21.660.90		\$4,557.59	\$21,650.90	\$98,168.03	\$34,941.53			\$203.92
June	\$21,640.00	\$35.242.68		\$21,640.00	\$84,864.50	\$40,529.08	\$44,335.42	182	\$193.64
A	19.19	They want	- A.S. A.	1					
		「如何是他 A.C. !!	L. K. B. Valle	3		Leading rates			
TOTALS	\$258,400.80	\$267,415.31	\$40,112.30	\$258,400.80	\$952,544.17	\$307,527.61		1,410	\$189.66
	1.								
						PROOFS			
	1			-		\$44,335.42	-		1
						\$44,335.42			
2017 - 2018			1						
Month			Admin. Cost	deposit	sub total	Total spent	balance	Families Assisted	Per Family
Batance Forward	\$0.00						\$44,335.42		
July	\$21,612.70		\$7,123.29			\$54,811.91	\$11,336.21		
August	\$21,614.50		\$3,212.20			\$24,826.88	\$8,323.83		
September	\$21,609.70		\$0.00			\$0.00	\$29,933.53		Ment Alex
October	\$21,688 70		\$1,124.61	\$21,688.70		\$8,621.98	\$43,000.25		
November	\$0.00		\$2,908.99	\$0.00		\$22,286.95	\$20,713.30		
December	\$0.00		\$0.00			\$0.00	\$20,713.30		
January	\$0.00	CHIEF TO SECURE TO SECURE	\$0.00			\$0.00	\$20,713.30		#DIV/01
February	\$0.00		\$0.00			\$0.00	\$20,713.30		11 80-1 11 01
March	\$0.00		\$0.00			\$0.00	\$20,713.30		11 100 1 01 01
April	\$0.00		\$0.00			\$0.00	\$20,713.30		11401110
May	\$0.00		\$0.00			\$0.00	\$20,713.30		#DIV/01
June	\$0.00	\$0.00	\$0.00	\$0.00	\$20,713.30	\$0.00	\$20,713.30	0	#DIV/01
	1					3-0			
TOTALS	\$86,525.60	\$95,780.83	\$14,367.09	\$86,525.60	\$368,447.91	\$110,147.72	12	529	\$181.06

NORTHERN KENTUCKY COMMUNITY ACTION COMMISSION DUICE HEA 2017-2018

2016 - 2017 Month	Deposited Funds	Funds Spent	Admin. Cost	deposit	sub total	Total spent	balance	Families Assisted	Dan Possibe
Balance Forward	\$0.00		regiliur. Gost	авром	SUD WED	town spent	\$93,462.23		Per Famury
July	\$21,380:10		\$8,429.71	\$21,380,10	\$114,822.33	\$84,627,77	\$50,194.58		\$213.6
August	\$21,375.30	CONTRACTOR DOWNERS AND ADDRESS OF					\$30,698,30		
September	\$21,400.60			\$21,400.60			\$28,250.23		
October	\$21,447.80	All Control of Control of Control of Control of Control							-
November	\$21,499.80			\$21,499.80					The state of the s
December	\$21,606.20			\$21,606.20				TO ME THE SHOP SHOULD BE SHOWN	Commence of the last of the la
January	\$21,653.10						\$68,543.23		
February	\$21,520.70			\$21,520,70					THE RESERVE OF THE PERSON NAMED IN
March	\$21,676.90								C AND RESIDENCE OF TAXABLE PARTY.
April	\$21,569.40								
	THE RESERVE AND ADDRESS OF THE PARTY AND ADDRESS OF THE PARTY.	of the latest the state of the							
May	\$21,650.90								
June	\$21,640.00	\$35,242.68	\$5,286.40	\$21,640.00	\$84,884.50	\$40,529.08	\$44,335.42	182	\$193.6
TOTALS	\$258,400.80	\$267,415.31	\$40,112.30	\$258,400.80	\$952,544.17	\$307,527.61		1,410	\$189.6
		+	-			DD00F0			
					1	PROOFS			-
		-	1	-	-	\$44,335.42			-
						\$44,335.42			-
2017 - 2018									
Month	Deposited Funds	Funds Spent	Admin, Cost	deposit	sub total	Total spent	balance	Families Assisted	Per Family
Balance Forward	\$0.00	The second secon	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	- Copean	-	Tomas apoint	\$44,335,42		
July	\$21,812.70		\$7,123.29	\$21,812,70	\$65,948.12	\$54,611.91			\$214.8
August	\$21,614.50					\$24,626.88			
September	\$21,609.70								The second second
October	\$21,688.70					\$8,621.98			-
November	\$21,737.90						The second secon		Annual Control of the
December	\$21,863.50								
January	\$21,919.70					\$0.00	A. C. C. Contract of the Contr		
February	\$21,926.20	The second secon				\$0.00			
	The same of the sa	The last the many band of the parties of the parties.		\$21,910.60		\$17,000.92	The second of the second		
				921,910.00					
March	\$21,910.60			634 ppg 46	2470 400 DE			THE PERSON NAMED AND ADDRESS OF THE PERSON NAMED IN COLUMN TWO IS NOT THE PERSON NAMED IN COLUMN TWO IS NAMED IN COLUMN T	
March	\$21,883.40	\$35,215,18	\$5,282.28						C4pp
Merch April May	\$21,883.40 \$21,867.50	\$35,215,18 \$14,815,42	\$5,282.28 \$2,222.31	\$21,867.50	\$109,860.70	\$17,037.73	\$92,822.98	80	
Merch April May	\$21,883.40	\$35,215,18 \$14,815,42	\$5,282.28 \$2,222.31	\$21,867.50	\$109,860.70			80	
Merch April May June	\$21,883.40 \$21,867.50	\$35,215,18 \$14,815,42 \$19,954,64	\$5,282.28 \$2,222.31 \$2,993.20	\$21,867.50 \$21,790.30	\$109,860.70 \$114,613.26	\$17,037.73 \$22,947.84	\$92,822.96 \$91,665.43	80	\$193.
	\$21,883,40 \$21,867,50 \$21,790,30	\$35,215.18 \$14,815.42 \$19,954,84	\$5,282.28 \$2,222.31 \$2,993.20	\$21,867.50 \$21,790.30	\$109,860.70 \$114,613.26	\$17,037.73 \$22,947.84	\$92,822.96 \$91,665.43	103	\$193.7
iderch April May June	\$21,883,40 \$21,867,50 \$21,790,30	\$35,215.18 \$14,815.42 \$19,954,84	\$5,282.28 \$2,222.31 \$2,993.20	\$21,867.50 \$21,790.30	\$109,860.70 \$114,613.26	\$17,037.73 \$22,947.84	\$92,822.96 \$91,665.43	103	\$193.
iderch April May June	\$21,883,40 \$21,867,50 \$21,790,30	\$35,215.18 \$14,815.42 \$19,954,84	\$5,282.28 \$2,222.31 \$2,993.20	\$21,867.50 \$21,790.30	\$109,860.70 \$114,613.26	\$17,037.73 \$22,947.84 \$214,094.70	\$92,622.96 \$91,665.43	103	\$193.



Invoice No. 17-005

Customer			Misc		
Name	Duke Energy Inc		Date	01/05	/18
	EC2ZA				
Address	PO Box 1006		Account No.	HEA/D	ecember 2017
City	Charlotte NC 28201			STATE OF	
	(704) 382-0209		Contact Name		Villiams
		0.00			55-2930
Quantity	Description HEA Admin fee - 15% of funds spent in December		Price		TOTAL
	Please remit payment to: NKCAC 717 Madison Avenue Covington, KY 41011			\$	843.00
-		TOTAL DI	UE	\$	843.00
nvoiced Ap	pproved	Date			
Return wite Payment Name:	Duke Energy Inc HEA/December 2017	- For	TOTAL	\$	843.00



Invoice No. 17-006

Customer			Misc	
Name	Duke Energy Inc		Date	04/09/18
	EC2ZA			
Address	PO Box 1006		Account No.	HEA/March 2018
City	Charlotte NC 28201			
	(704) 382-0209		Contact Name	
1 1 1/2				859-655-2930
Quantity	Description HEA Admin fee - 15% of funds spent in March 2		Price	TOTAL
	March 2018 \$14,783.41 distributed Please remit payment to: NKCAC 717 Madison Avenue			\$ 2,217.51
land An	Covington, KY 41011	TOTAL DUE		\$ 2,217.5
Invoiced Ap	proved	Date	number	
Return with Payment Name: Account # nvoice Date nt Enclosed	Duke Energy Inc HEA/March 2018 1/5/2018	Offic	TOTAL e Use Only	\$ 2,217.5
	Northern Kentucky Community 717 Madison / Covington, KY	Avenue	n, Inc.	



Invoice No. 17-007

Customer			Misc		
Name	Duke Energy Inc		Date	05/07	/18
	EC2ZA	10000		-	The Wall
Address	PO Box 1006	Like Tolland	Account No.	HEA	April 2018
City	Charlotte NC 28201				
	(704) 382-0209		Contact Name		
					55-2930
Quantity	Description HEA Admin fee - 15% of funds spent in April 2018		Price		TOTAL
	April 2018 \$35,215.18 distributed Please remit payment to: NKCAC 717 Madison Avenue Covington, KY 41011			\$	5,282.28
		TOTAL DU	E	\$	5,282.28
Invoiced Ap	proved	Date			
Return wit					-
Payment	Check	7			
		1			
Name:	Duke Energy Inc		TOTAL	\$	5,282.28
	HEA/April 2018	1			
nvoice Date	4/7/2018	Offi	ce Use Only		
mt Enclosed					
THE ETHOLOGOG	Annual Contract of the Contrac				
	Northern Kentucky Community Ac 717 Madison Ave		ion, Inc.		



Invoice No. 17-007

Customer		CHARLE STATE	Misc	
Name	Duke Energy Inc		Date	06/06/18
Name	EC2ZA		Date	00/00/18
Autotoria	PO Box 1006		Account No.	MEADA ODAO
Address	Charlotte NC 28201		Account No.	HEA/May 2018
City	(704) 382-0209		Contact Name	Bob Williams
	(704) 302-0208		Contact Ivame	859-655-2930
Quantity	Description		Price	TOTAL
Guantity	HEA Admin fee - 15% of funds spent in May 20	119	FIICE	TOTAL
	Please remit payment to: NKCAC 717 Madison Avenue Covington, KY 41011			\$ 2,267.
		TOTAL D	UE	\$ 2,267.
Invoiced Ap	proved	Date		
Payment Name: Account # nvoice Date nt Enclosed	Duke Energy Inc HEA/May 2018 4/7/2018	O	TOTAL	\$ 2,267
	Northern Kentucky Community 717 Madison Covington, K	Avenue	sion, Inc.	



Invoice No. 17-008

717 Madison Avenue Covington, KY 41011

Customer			Misc		
Name	Duke Energy Inc		Date	07/20	1/18
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Address	PO Box 1006		Account No.	HEA.	June 2018
City	Charlotte NC 28201				1980/
	(704) 382-0209		Contact Name		
					355-2930
Quantity	Description HEA Admin fee - 15% of funds spent in		Price		TOTAL
	June 2018 \$19,954.64 distributed Adjustment credit from overbilling in May 2018 Please remit payment to:			\$	2,993.20
	NKCAC 717 Madison Avenue Covington, KY 41011	TOTAL DUE		\$	2,948.20
Invoiced Ap	proved	Date			
	Duke Energy Inc HEA/June 2018 7/1/2018	Office	TOTAL a Use Only	\$	2,948.20
	Northern Kentucky Community Act 717 Madison Ave Covington, KY 41	nue	n, Inc.		

Duke Energy Kentucky

Case No. 2018-00261

Staff First Set Post Hearing Data Requests

Date Received: February 8, 2019

STAFF-POST HEARING-DR-01-005

REQUEST:

Explain whether Duke Kentucky would agree to raise the HEA Program fee to \$0.25 per

meter per month in order to be in line with other Kentucky gas utility energy assistance

programs.

RESPONSE:

Although the Company is not opposed to an increase to the HEA program charge per meter,

per customer, for gas customers, upon review, the current level of HEA funding appears

sufficient to achieve the program's objectives. In this regard, Company is not aware of

NKCAC ever having turned away customers in need of assistance due to a lack of HEA

funds. In fact, NKCAC does not typically exhaust the annual HEA funding dollars and

regularly has a funding balance from year to year that is refunded to customers through the

DSM program rider true-up. For the fiscal year ending June 2018, the HEA program had

an unused balance of more than \$47,000 that was included as a credit to customers in the

Company's 2018 Rider DSM filing. Between the fiscal year ended June 30, 2012, to fiscal

year ended June 2018, customers have received credits of approximately \$82,000 in the

annual DSM rider true-up filings for undistributed HEA funds. Although the Company is

aware that other Kentucky jurisdictional utilities have HEA customer charges that are

higher, there are differences between the sizes of the utilities and their respective service

areas that should be taken into consideration in deciding whether such charges should be

aligned.

Additionally, the Company did not propose to increase the HEA program's monthly charge as part of this case and, consequently, is concerned with the lack of notice to customers of this potential change.

In light of the aforementioned, the Company submits that further evaluation as to whether its HEA program charges for gas customers should be increased for the purpose of aligning of the charges imposed by other gas companies in the Commonwealth is appropriate. Such evaluation may be appropriately undertaken in the context of the Company's next annual DSM application filed under KRS 278.285 where both electric and natural gas HEA programs and charges can be considered together. This would provide all customers with notice of a potential change and the Commission with the opportunity to consider the entire program including extending its continuation, which presently is only approved through 2020. The Company will file its next annual DSM review proceedings in November 2019. Continuing the HEA funding issue until that November filing will provide the Commission with the benefit of allowing the Company sufficient time to more fully investigate the current program and determine if there are any program enhancements that should be made to provide additional funding for bill assistance, as well as present evidence regarding recommended changes to funding levels. This would also allow the Company time to obtain the input of its DSM collaborative. Should the Commission decide to defer adjusting the HEA rate until the next DSM adjustment case, the Company commits to working with the Commission and all interested stakeholders to discuss reasonable levels of funding for the HEA program.

PERSON RESPONSIBLE:

Amy Spiller

Staff First Set Post Hearing Data Requests

Date Received: February 8, 2019

STAFF-POST HEARING-DR-01-006

REQUEST:

Explain in full detail whether Duke Kentucky would agree to use shareholder funds to

match 100 percent of customer contributions to the HEA Program.

RESPONSE:

As previously stated in response to STAFF-POST HEARING-DR-01-005, the Company

is not opposed to increasing the HEA program fund monthly charge for gas customers;

however, the current funding levels appear appropriate as, upon information and belief, the

NKCAC is not experiencing a shortage of HEA (or WinterCare) funding for bill assistance

for the Company's customers. In fact, because of the annual Rider DSM true-up, it is

common for customers to receive a credit for any unused HEA dollars. Additionally, the

Company is already providing shareholder dollars for bill payment assistance through

funding an initial \$25,000/ year contribution for the WinterCare/HEA program as "seed

money" as well as an additional \$25,000/ year in Company match for employee/customer

voluntary WinterCare contributions. That said, the Company does recognize the

importance of corporate support for low income services. Because of the sufficient funding

for HEA, the Company proposes to provide an annual contribution of \$25,000 of

shareholder dollars to be used for low-income weatherization programs for natural gas

customers to be administered by a third party yet to be decided (e.g. NKCAC, People

Working Cooperatively), instead of additional bill payment assistance. Weatherization of

qualifying homes can have a more meaningful and longer term beneficial impact on

eligible, low-income customers by addressing the root cause of any inefficient energy consumption and reduce energy bills over the long-term.

PERSON RESPONSIBLE:

Amy Spiller

Duke Energy Kentucky
Case No. 2018-00261
Staff First Set Post Hearing Data Requests
Date Received: February 8, 2019

STAFF-POST HEARING-DR-01-007

REQUEST:

Provide the name of the Duke Kentucky employee that manages its various demand-side management and assistance programs.

RESPONSE:

Greg Tiernan - Director Products and Services (Non-Residential DSM programs)

Rick Mifflin – Director Products and Services (Residential DSM programs)

Lorrie Maggio – Manager Products and Services (Residential Assistance Programs)

Cindy Givens – Senior Products and Services Specialist (Residential Assistance Programs)

PERSON RESPONSIBLE: Trisha Haemmerle

Staff First Set Post Hearing Data Requests Date Received: February 8, 2019

STAFF-POST HEARING-DR-01-008

REQUEST:

Pursuant to 807 KAR 5:022, Section 3(4) each gas utility is required to conduct periodic

tests of all meters in accordance with a specified schedule, and under 807 KAR 5:006,

Section 4(4), each gas utility is required to file quarterly meter test reports.

a. Confirm that Duke Kentucky files quarterly meter reports with the Commission in

accordance with 807 KAR 5:006, Section 4(4).

b. If Duke Kentucky does file quarterly meter reports, explain in full detail how Duke

Kentucky transmits the quarterly meter reports to the Commission.

c. Provide copies of the 2018 reports.

RESPONSE:

a. Duke Energy does file the Quarterly Commission report required by 807 KAR

5:022, Section 3 (4).

b. The quarterly report preparation is a three-part process involving three (3) different

groups: Field Metering Services, Gas Measurement Center and Revenue Services.

The report is based upon meter test taken within each quarter of meters tests of

Positive-displacement meters, with rated capacity above 500 cubic feet per hour,

up to and including 1,500 cubic feet per hour, from the quarterly report an Annual

report is run to determine the meters eligible for periodic age change per

commission guidelines. This data analyzes meter test dates to determine eligibility.

This total number will stay the same throughout the year. Power BI tracks live data

of the number of meters removed and the number of meters tested. This information

is reported quarterly on the Commission's report. The Gas Measurement Center

Supervisor will provide the quarterly reports of meters tested to Field Metering,

Field Metering will forward that report to Revenue Services, and Revenue Services

will send the final report to the Commission. The reports were historically sent to

the Commission via email to the following email address: pipeline-ky@ky.gov.

This address was provided to the Company several years ago by someone at the

Commission. The Company now understands that the new address for submitting

the reports is PSC.Pipeline.Safety@ky.gov and it has already provided prior

reports to this new address.

c. Please see STAFF-POST HEARING-DR-01-008 Attachment for copies of the

quarterly reports for 2018. The fourth quarter report will be completed and

submitted by end of first quarter 2019.

PERSON RESPONSIBLE:

Ryan Champness

Mark Davis

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Staff First Set Post Hearing Data Requests

Date Received: February 8, 2019

STAFF-POST HEARING-DR-01-009

REQUEST:

In response to Staff's Third Request for Information, Item 11, Mr. Barbare stated that if

Duke Kentucky fails to conduct a periodic meter test as required by 807 KAR 5:022,

Section 3(4), Duke Kentucky provides official notification to the Commission. Explain in

full detail if this notification is provided with the quarterly meter test reports, or if Duke

Kentucky utilizes a different notification process.

RESPONSE:

In late 2018, the Gas Measurement Center implemented a reporting process that would

follow the results of the fourth quarter report to notify the Commission of any inability to

complete testing. With this new process, if the results from the fourth quarter revealed that

Duke Energy Kentucky failed to conduct a periodic meter test as required, the final fourth

quarter report and supporting documentation of why those meter tests were not made is

submitted to Duke Energy's Regulatory Compliance Group for review and to make any

notifications to the commission on behalf of Duke Energy Kentucky. Prior to this change,

the Company did not have the process to report on this information.

PERSON RESPONSIBLE:

Tyler Barbare

Mark Davis

Duke Energy Kentucky
Case No. 2018-00261
Staff First Set Post Hearing Data Requests
Date Received: February 8, 2019

STAFF-POST HEARING-DR-01-010

REQUEST:

Provide Duke Kentucky's regulated return on equity (ROE) for gas operations for 2018.

RESPONSE:

Please see STAFF-POST HEARING-DR-01-010 Attachment, which provides a calculation of the ROE for Duke Energy Kentucky's gas operations.

PERSON RESPONSIBLE: William Don Wathen Jr.

Duke Energy Kentucky Actual ROE for Gas Operations in 2018

Line	Description	Amount	Comment
1	Operating Revenue	\$101,996,443	per books
	Operating Expenses (excl Income Tax)		
2	O&M Expense	\$68,625,681	per books
3	Depreciation	14,793,816	per books
4	Regulatory (Debits)/Credits - Net	(2,550,960)	per books
5	Total Taxes Other Than Income Taxes	3,559,077	per books
6	Total Operating Expense Before Income Taxes	\$84,427,614	Sum L.2 thru L5
7	Earnings Before Interest and Taxes	\$17,568,829	L.1 - L.6
8	Total Interest Expense	\$20,025,251	per books
9	Interest Expense Allocation to Gas (%)	27.63%	WPA-1b from rate case
10	Interest Expense Allocation to Gas (\$)	\$5,533,177	L.8 * L.9
11	Taxable Income	\$12,035,652	L.7 - L.10
	Common Equity		
12	Balance at 12/31/17 ·	\$511,414,427	per books
13	Balance at 12/31/18	596,223,648	per books
14	Average Balance	\$553,819,038	Avg. L.12,L.13
15	Equity Allocated to Gas	\$153,025,738	L.14 * L.9
16	Pre-Tax Return on Equity	7.87%	L.11 ÷ L.15
17	Combined Effective Statutory Income Tax Rate	25.09%	Sch. H from rate case
18	After Tax Return on Equity	5.89%	L.16 * (1-L.17)

Duke Energy Kentucky
Case No. 2018-00261
Staff First Set Post Hearing Data Requests
Date Received: February 8, 2019

STAFF-POST HEARING-DR-01-011

REQUEST:

Provide Duke Kentucky's updated capital structure reflecting the October 2018 debt issuances.

RESPONSE:

Line		13 Month Avg.	% of
No.	Description	Balance	Total
		\$	
1	Common Equity	\$ 621,113,054	50.756%
2	Long-Term Debt	\$ 518,106,049	42.338%
3	Short-Term Debt	\$ 84,508,435	6.906%
4			
5	Total Capital	\$1,223,727,538	100.000%

PERSON RESPONSIBLE: Jack Sullivan

Staff First Set Post Hearing Data Requests

Date Received: February 8, 2019

STAFF-POST HEARING-DR-01-012

REQUEST:

Reference Duke Kentucky's response to Commission Staff's Third Request for

Information, Item 24(b) as well as the corresponding attachment. In this response, Duke

Kentucky provides a breakdown of forecasted plant additions by month in an Excel

spreadsheet.

a. The months of June 2018 through December 2018 are now historical in nature.

Provide an update as to the status of these projects.

b. Explain in full detail if Duke Kentucky actually spent the amounts listed on the

spreadsheet on gas plant additions for the months of June through December 2018.

c. Elaborate on any projects completed during this period and explain how they were

classified when recorded.

d. Explain why the amounts spent on gas plant additions tend to be large amounts on

a quarterly basis, but very small amounts for the other months.

RESPONSE:

a. Please see STAFF-POST HEARING-DR-01-012 Attachment.

b. The projected gas plant additions for the months of June 2018 through December

2018 provided in the earlier response totaled \$37,809,183 and the actual gas plant

additions for the same period totaled \$47,056,830. Please see STAFF-POST

HEARING-DR-01-012 Attachment for details.

c. Please see STAFF-POST HEARING-DR-01-012 Attachment.

d. As you can see in the attachment, actual gas plant additions do not always follow

the quarterly pattern. The company used a quarterly closing convention for certain

projects for the purpose of forecasting plant additions. This forecasting assumption

is used for project classes where capital expenditures are expected to close

approximately every three months, however the closings can actually be spread

more evenly over the months in actuals.

PERSON RESPONSIBLE:

Nick Giaimo

Duke Energy Kentucky Actual Gas Plant Additions (June 2018 - Dec 2018) By Project Class

	Jun - 2018	Jul - 2018	Aug - 2018	Sep - 2018	Oct - 2018	Nov - 201B	Dec - 2018	Total
ZK - Gas Meters	472,917	354,862	497,358	638,000	472,050	357,858	222,204	3,015,249
ZG - Gas Special Projects	763,037	(357,742)	3,784,585	1,315,189	1,849,932	785,164	1,221,608	9,381,772
ZH - Gas Distribution	2,236,910	5,201,855	1,634,344	1,358,402	2,434,654	11,357,135	6,089,502	30,312,801
Total Distribution Plant	3,472,864	5,198,975	5,916,286	3,311,591	4,756,635	12,500,157	7,533,315	42,689,822
ZH - Gas Distribution		(17,454)	254,527	172,033	220,958	180,600	73,975	884,639
General Plant-Building, Ground, Office Equip & Other	7,713	3,969	184,488	10,125	5,883	104,795	96,953	413,925
VS - Intangible Plant - Software	13,835	3,023,361	33,704	2,735	(3,678)	(504)	(1,019)	3,068,434
Total General Plant & Intangible	21,548	3,009,875	472,720	184,892	223,163	284,891	169,909	4,366,998
Total	3,494,412	8,208,850	6,389,006	3,496,483	4,979,798	12,785,048	7,703,224	47,056,820

Duke Energy Kentucky Actual Gas Plant Additions (June 2018 - Dec 2018) By FERC Classification

	Jun - 2018	Jul - 2018	Aug - 2018	Sep - 2018	Oct - 2018	Nov - 2018	Dec - 2018	Total
20401 - Rights of Way							(8)	(8)
27500 - Structures & Improvements	3,328	179,355	528,879	141,485	675	196,227	(13,808)	1,036,142
27602 - Gas Mains - Dist Lines/Stee	789,572	3,804,472	352,632	730,164	768,161	1,962,807	91,940	8,499,748
27603 - Gas Mains - Dist Lines/Plas	29,776	61,356	165,252	(212,002)	73,728	8,578,653	1,538,988	10,235,752
27605 - Gas Mains - Feeder Lines/St	411,021	304,166	223,746	(13,770)	56,946	135,570	2,652,060	3,769,738
27800 - System Meas & Reg Station	158,373	710,933	205,976	419,040	791,770	154,214	1,235,286	3,675,592
27801 - System M & R St. Electronic	27,709	639	11,959	44,614	362,039	64,304	10,642	521,905
27802 - District Regulating Equipme	34,217							34,217
28002 - Services - M- C Steel	2,830	1,971	6,143	1,523	758	535	3,307	17,067
28003 - Services - M-C Plastic	384,494	163,735	1,076,415	1,239,054	1,169,084	1,203,189	2,345,264	7,581,234
28006 - Services C-M Plastic	553,555	(387,640)	2,847,655	317,278	1,062,485	(154,130)	(579,140)	3,660,063
28008 - Services C-M Steel	10,906	5,121	264	13,056	2,109	2,852	12,649	46,957
28100 - Meters	1,067,082	161,945	217,957	, 193,952	158,965	133,652	82,420	2,015,974
28102 - Uof F Gas Meters	4	20 /00	-	3,031				3,031
28200 - Meter Installations		165,244	239,292	394,542	254,934	176,065	127,281	1,357,357
28300 - House Regulators		22,974	32,984	32,888	44,724	37,973	9,207	180,749
28400 - House Regulator Installatio	-	4,706	7,131	6,736	10,258	8,247	2,111	39,189
28801 - ARO Gas Mains Cast Iron		-					(27)	(27)
28802 - ARO Gas Mains Steel	14	4	-			20	(14,491)	(14,491)
28803 - ARO Gas Mains Plastic							29,625	29,625
Total Distribution Plant	3,472,864	5,198,975	5,916,286	3,311,591	4,756,635	12,500,157	7,533,315	42,689,822
20300 - Miscellaneous Intangible Pi	14,047	3,020,516	33,704	2,735	1,103	531	(171)	3,072,485
20310 - Misc Intengible Pit - 10 Yr	3,116					+		3,116
29101 - Electronic Data Processing	167	6,813	158,029	846	987	81	6,770	173,694
29400 - Tools, Shop & Garage Equip	4,218		26,459	9,278	114	103,679	89,335	233,083
29700 - Communication Equipment		(17,454)	254,527	172,033	220,958	180,600	73,975	884,639
Total General Plant & Intangible	21,548	3,009,875	472,720	184,892	223,163	284,891	169,909	4,366,998
Total	3,494,412	8,208,850	6,389,006	3,496,483	4,979,798	12,785,048	7,703,224	47,056,820

Staff First Set Post Hearing Data Requests

Date Received: February 8, 2019

STAFF-POST HEARING-DR-01-013

REQUEST:

Explain how Duke Kentucky would propose to structure the rate design if it were to

increase the revenue required by Rate GS so that the rate of return at proposed rates was

4.5 percent.

RESPONSE:

To achieve a rate of return at proposed rates of 4.5 percent for Rate GS, 16.68% of the

interclass subsidization would need to be eliminated. The proposed increase for Rate GS

would be 9.3%.

Because these numbers are so close to the proposed settlement numbers for Rate GS

(4.45% ROR and 9.12% increase), the Company would propose to maintain its settlement

rate structure except that the per MCF charge would be slightly increased.

PERSON RESPONSIBLE:

James E. Ziolkowski

Duke Energy Kentucky
Case No. 2018-00261
Staff First Set Post Hearing Data Requests

Date Received: February 8, 2019

STAFF-POST HEARING-DR-01-014

REQUEST:

Provide the amount that rates would increase for Rate GS if 100 percent of the subsidies

were to be removed.

RESPONSE:

If 100% of the subsidy is removed, Rate GS would see a 19.70% increase in base rates.

Rate RS would see a 6.56% increase. Rate FT-L and Rate IT would go down by 23.25%

and 21.86%, respectively.

PERSON RESPONSIBLE:

James E. Ziolkowski

Duke Energy Kentucky
Case No. 2018-00261
Staff First Set Post Hearing Data Requests
Date Received: February 8, 2019

STAFF-POST HEARING-DR-01-015

REQUEST:

Explain in full detail when the subsidization of Rate GS began and the reason why this subsidization occurred.

RESPONSE:

Duke Energy Kentucky eliminated one hundred percent of the subsidy/excess in its previous gas base rate case, Case No. 2009-00202.

In the nine years between the filings in Case No. 2009-00202 and Case No. 2018-00261, Rate GS annual MCF usage declined from 3,980,221 MCF to 3,131,108 MCF, a 21.3% decrease. The Rate GS MCF per bill decreased from 47.20 to 36.73, a 22.2% decrease.

Rate FT-L saw a 120.7% increase in annual MCF usage during the nine years between cases: 2,617,229 MCF versus 1,185,859 MCF.

	TOTAL GAS	RS RESIDENTIAL	GS GENERAL SERV	FT FIRM TRANS	IT INTERRUPT TRANS
MCF					
2018-00261	13,143,813	5,915,484	3,131,108	2,617,229	1,479,992
2009-00202	13,246,468	6,850,026	3,980,221	1,185,859	1,230,362
% CHANGE	-0.8%	-13.6%	-21.3%	120.7%	20.3%

For all classes, rate base increased from 2009 to 2018. For Rate GS, the rate base per MCF increased by 57.2% between rate cases. The following table shows the change in rate base per MCF for the four rate classes:

	TOTAL	RS	GS	FT	IT
	GAS	RESIDENTIAL	GENERAL SERV	FIRM TRANS	INTERRUPT TRANS
RATE BASE					
2018-00261	313,423,577	216,755,621	71,593,514	19,240,277	5,834,165
2009-00202	256,756,504	183,081,609	57,911,469	10,821,769	4,941,657
% CHANGE	22.1%	18.4%	23.6%	77.8%	18.1%
RATE BASE PER MCF					
2018-00261	23.8	36.6	22.9	7.4	3.9
2009-00202	19.4	26.7	14.5	9.1	4.0
CHANGE IN RATE BASE PER M	CF 4.5	9.9	8.3	(1.8)	(0.1)
% CHANGE	23.0%	37.1%	57.2%	-19.4%	-1.9%

The Company believes that the main drivers causing the subsidy of Rate GS in Case No. 2018-00261 are the large decrease in Rate GS annual MCF and the large increase in rate base per MCF during the nine years since the last gas base rate case.

PERSON RESPONSIBLE:

James E. Ziolkowski

Duke Energy Kentucky
Case No. 2018-00261
Staff First Set Post Hearing Data Requests
Date Received: February 8, 2019

STAFF-POST HEARING-DR-01-016

REQUEST:

Provide the total number of Duke Kentucky employees for the base period.

RESPONSE:

As of the end of the base period (11/30/18), Duke Energy Kentucky had 195 employees.

PERSON RESPONSIBLE: Renee Metzler

Staff First Set Post Hearing Data Requests

Date Received: February 8, 2019

STAFF-POST HEARING-DR-01-017

REQUEST:

Provide the total number of Duke Kentucky employees for the forecasted test period.

RESPONSE:

In accordance with the Company's budgeting process, headcount data is not used in

determining labor budgets (which budgets were used in developing the Company's

forecasted test period). Labor budgets are determined based on salary dollars. Thus, Duke

Energy does not have a "total number of Duke Energy Kentucky employees for the

forecasted test period." As of the end of the base period (11/30/18), Duke Energy Kentucky

had 195 employees. As of December 31, 2018, Duke Energy Kentucky had also 195

employees.

PERSON RESPONSIBLE:

Renee Metzler

Staff First Set Post Hearing Data Requests

Date Received: February 8, 2019

STAFF-POST HEARING-DR-01-018

REQUEST:

Provide the exact number of meter reading positions that Duke Kentucky has eliminated

up to the present.

RESPONSE:

As noted in response to STAFF-DR-05-002, "as of December 31, 2018, 11 positions have

already been eliminated." This number has not changed. As of January 31, 2019, 11

positions have been eliminated.

PERSON RESPONSIBLE:

Gary Hebbeler

Staff First Set Post Hearing Data Requests

Date Received: February 8, 2019

STAFF-POST HEARING-DR-01-019

REQUEST:

Provide the exact number of meter reading positions that Duke Kentucky will eliminate in

the future.

RESPONSE:

As noted in response to STAFF-DR-05-002, "the current expectation is that 14 positions

will be eliminated by the first quarter of 2020." These 14 positions include the 11 positions

that have already been eliminated as of January 31, 2019. Therefore, 3 additional positions

are expected to be eliminated.

PERSON RESPONSIBLE:

Gary Hebbeler

Staff First Set Post Hearing Data Requests

Date Received: February 8, 2019

STAFF-POST HEARING-DR-01-020

REQUEST:

Explain whether Duke Kentucky would agree to include the Pick Your Own Due Date

Program that is currently in its electric tariff in the gas tariff. If not, explain why not.

RESPONSE:

The Company would prefer not to add this program to the gas tariff. The Pick Your Own

Due Date program is enabled through the Company's electric smart meter. Combination

electric and gas customers who have not opted out of the Company's electric smart meter

capabilities can take advantage of the Pick Your Own Due Date program because they have

the electric AMI meter that can be accessed at any time for billing purposes. However, gas

service only customers are not eligible for this program because those customers do not

have an AMI device. Gas only customers have the drive-by AMR devices. While the

Company prefers not to add this program to the gas tariff to avoid customer confusion, at

the Commission's direction, it could be added with specific wording.

PERSON RESPONSIBLE:

Joseph R. Thomas

Staff First Set Post Hearing Data Requests

Date Received: February 8, 2019

STAFF-POST HEARING-DR-01-021

REQUEST:

Refer to Duke Kentucky's response to Commission Staff's Second Request for

Information, Item 6(b), in which Duke Kentucky agreed to include the provisions of the

Adjusted Due Date Program in its gas tariff. Explain whether Duke Kentucky would agree

to include the provisions of the Adjusted Due Date Program in its electric tariff.

RESPONSE:

For Duke Energy Kentucky electric customers with a smart meter, the Adjusted Due Date

program is less flexible than the Pick Your Due Date program. There is no need for the

Adjusted Due Date when Pick Your Due Date is available for these electric customers. The

Adjusted Due Date Program is targeted for gas only customers that do not have an AMI

meter that supports Pick Your Due Date, but rather only have the AMR technology. As a

result, Duke Energy Kentucky prefers not to add the provisions of the Adjusted Due Date

program in its electric tariff.

PERSON RESPONSIBLE:

Bruce L. Sailers

Staff First Set Post Hearing Data Requests

Date Received: February 8, 2019

STAFF-POST HEARING-DR-01-022

REQUEST:

Explain Duke Kentucky's process to allow customers to opt out of receiving a full bill, and

instead receive a condensed bill.

RESPONSE:

Duke Energy Kentucky has not begun offering the condensed bill program as an "opt in"

program. The billing system functionality to enable customers to "opt in" to a condensed

bill is being programed. The Company was able to seamlessly and immediately move

customers to a detailed bill as per the Commission's order. However, switching the

condensed bill availability from an "opt out" program to an "opt in" program required

changes to the Company's Customer Information and billing systems. As a result, the

Company has not yet been able to make the condensed bill available to customers as an

"opt in" program and expects that to be completed in late first quarter/early second quarter

2019. The Company will provide sample bills for the condensed bill opt in program when

it is available.

PERSON RESPONSIBLE:

Suzanne Kesling

Staff First Set Post Hearing Data Requests

Date Received: February 8, 2019

STAFF-POST HEARING-DR-01-023

REQUEST:

If customers can opt out of receiving the full bill by checking a box on the bill, provide a

sample bill showing where the box is located and explain why such a box does not appear

on the bill format currently in Duke Kentucky's tariff on file with the Commission.

RESPONSE:

The billing system functionality to enable customers to "opt in" to a condensed bill is being

programed. The Company was able to seamlessly and immediately move customers to a

detailed bill as per the Commission's order. However, switching the condensed bill

availability from an "opt out" program to an "opt in" program required changes to the

Company's Customer Information and billing systems. As a result, the Company has not

yet been able to make the condensed bill available to customers as an "opt in" program and

expects that to be completed in late first quarter/early second quarter 2019. Please see

STAFF-POST HEARING-DR-01-023 Attachment for the sample bill. Duke Energy

Kentucky will update its bill format when the opt in functionality is activated.

PERSON RESPONSIBLE:

Suzanne Kesling

DETAILED VERSION

Account Number 0000-0000-00-0

80 12

For less detailed billing information on your monthly bill, check box on right

Mar 12, 2019

\$ 164.37

\$ _____\$

WinterCare Contribution (for Customer Assistance)

Amount Due

\$ 164.37

Sample Bill 100 Main St. Covington KY 41014

PO Box 1326 Charlotte NC 28201-1326

Page 1 of 2

Sample Bill	Duke Energy	1-800-544-6900	0000-0000-00-0
100 Main St.	- Hilly M. C. Land		
Covington KY 41014			

Maii Caymeii	la: 1 /5	Accountin	itormation
PO Box 1326	NC 28201-1326	Payments after Feb 18 not included	Bill prepared on Feb 18, 2019
Charlotte		Last payment received Feb 05	Next meter reading Mar 18, 2019

Meter	Number	Readi From	ng Date To	Days	Meser Rea Previous	ring Present	Usage
Gas	000000000	Jan 17	Feb 15	29	289	414	125
Elec	000000000	Jan 17	Feb 15	29	7157	7505 -	348

Usage - 125 CCF	
Usage - 125 CCF Duke Energy - Rate RS	\$ 118.62
Current Gas Charges	\$ 118.62

Electric Pasidential	
Usage - 348 kWh Duke Energy - Rate RS	\$ 41.28
Current Electric Charges	\$ 41.28

Taxes	
Taxes	\$ 4.47

Amt Due - Previous Bill	\$ 161.21
Payment(s) Received	161.21ci
Balance Forward	0.00
Current Gas Charges Current Electric Charges	118.62
Current Electric Charges	41.28
Taxes	4.47
Current Amount Due	\$ 164.37

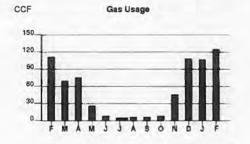
Due Date	Amount Due	After Mar 12, 2019
Mar 12, 2019	\$ 164.37	\$ 170.73

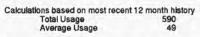
Page 2 of 2

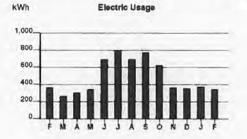
Name	Service Address	Account Number
Sample Bill	100 Main St. Covington KY 41014	0000-0000-00-0

Gas Meter -	000000000	Duke Energy Rate RS - Residential Service		
CCF Usage - Jan 17 - Feb 15 29 Days	125	Customer Charge Gas Delivery Charge 125 CCF @ \$ 0.37213000 Gas DSM Rider 125 CCF @ \$ 0.04085600cr Gas Cost Recovery 125 CCF @ \$ 0.41880000 Service Replacement Rider Gas WNA Rider 125 CCF @ \$ 0.000000000	\$ 16.10 46.52 5.11cr 52.35 3.22 0.00	\$ 118.62
		Total Current Ga	and the Children	\$ 118.62
Electric Meter -	000000000	Duke Energy Rate RS - Residential Service		
kWh Usage - Jan 17 - Feb 15 29 Days	348	Customer Charge Energy Chrg 348 kWh @ \$ 0.07165000 Elec DSM Rider 348 kWh @ \$ 0.00303500 Rider PSM 348 kWh @ \$ 0.00010400cr Elec Fuel Adjustment 348 kWh @ \$ 0.00249000 Rider ESM	\$ 11.10 24.93 1.06 0.04cr 0.87 3.36	41.28
		Total Current Electri	Charges	\$ 41.28

	Explanation of Texas		
Taxes	Franchise Fee-Covington	\$ 4.47	\$ 4.47
		Total Taxes	\$ 4.47







Calculations based on most recent 12 month history
Total Usage 5,957
Average Usage 496

	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	ОСТ	NOV	DEC	JAN	FEB
Gas	111	70	75	26	8	5	6	6	8	46	108	107	125
Electric	361	269	307	347	698	798	693	777	623	364	356	377	348

(N) (N)

DETAILED VERSION

Bill Payment Made Easy

Paperless Billing - View and pay your bill for free by registering at www.duke-energy.com

Automatic Draft - Free Service, payment automatically drafts from your bank account. Enroll at

www.duke-energy.com/paymybill or call 1-800-544-6900.

Speedpaye - Pay by phone 1-800-544-6900 with credit card or check. A convenience fee will be charged.

EXPLANATION OF ESTIMATED CHARGES

Meters are scheduled to be read monthly. Regular meter readings are essential for accurate billing. When we are unable to read a meter, the usage is estimated based on previous bills. An estimated read will be considered the same as an actual read.

PAYMENT OF BILLS

In order to avoid paying a late charge, please mail your payment to Duke Energy several days before the due date. Or, if you prefer, you may pay by phone through Speedpay, pay online with Paperless-Billing, or pay automatically through Automatic Draft. Payments can also be made at a Pay Agent location. For more information about our bill payment options, please visit us at www.duke-energy.com or call 1-800-544-6900. When you pay by check, you authorize us to convert your check into a one-time electronic check payment or to process the payment as a regular check transaction.

Disconnection of your utility service(s) will not result from failure to pay any non-tariffed or non-regulated products or services.

LATE PAYMENT CHARGE INFORMATION

A penalty may be assessed if a customer fails to pay a bill for services by the due date shown on the customer's bill. The penalty may be assessed only once on any bill rendered services.

EXPLANATION OF BILL LANGUAGE

(The following terms will not appear on every bill)

BBP Cycle	Period of time used to calculate the current Budget Billing monthly installment amount.
CCF	Gas usage, measured in hundreds of cubic feet.
CR	Credited amount.
Current Gas Charges	Total of all charges based on gas usage during the current billing period.
Customer Charge	Charge for administrative costs, including meter reading, billing, and collecting. The Customer Charge for each service includes 10 cents for an energy assistance program approved by the Public Service Commission.

Elec. Rate	Code that identifies the rate used to determine the Electric Usage Charge.
EST or E	Estimated Meter Read.
Gas Rate	Code that identifies the rate used to determine the Gas Usage Charge.
kWh	Electric usage measured in kilowatt-hours,
Late Payment	Additional charge added to the bill if the Amount To Pay is not received in full by the due date.
Meter Multiplier	Constant number that the meter reading usage is multiplied by to obtain the energy usage.
Usage	Amount of energy used during the billing period.

GAS COST INFORMATION

The GAS COST ADJUSTMENT (GCA) rate is the cost (per 100 cubic feet) of gas we purchase from our suppliers. This rate varies periodically as gas prices to us increase or decrease. Duke Energy makes no profit on this charge since it is based on the actual cost we pay our suppliers for the gas we purchase and resell. The GCA amount is included in your total bill as an addition to the Gas Usage Charge, which covers our normal operating expenses for delivering gas to you.

ELECTRIC COST INFORMATION

The ELECTRIC FUEL ADJUSTMENT (EFA) rate is the increase or decrease (since determination of the Base Period Fuel Cost) in the cost of fuel purchased from our supplier and used to generate electricity. The EFA rate is computed monthly according to a formula established by the Kentucky Public Service Commission. Duke Energy makes no profit on the EFA since it is based on the actual cost of fuel used to generate electricity. The amount of the EFA is included in your total bill.

BILLING OR SERVICE INQUIRIES

If you have a question about your bill or service, call us at 1-800-544-6900. You may also write to our Customer Services Department at P.O. Box 960, Mail Drop 309C, Cincinnati, OH 45201, contact us by fax at 1-800-366-4704, or e-mail us at www.duke-energy.com. Rate schedules and service regulations are available upon request.

SECURITY DEPOSIT INFORMATION

If the utility will or may retain either an equal or calculated deposit for more than eighteen (18) months, at the customer's request, the deposit will be recalculated every eighteen (18) months based on actual usage of the customer. If the deposit on account differs by more than ten (10) dollars for residential customers, or by more than ten (10) percent for nonresidential customers, from the deposit calculated on actual usage, then the utility shall refund any over-collection and may collect any underpayment.

BUSINESS HOURS

Cincinnati - 8:00 a.m. - 5:00p.m. Monday - Friday Erlanger - 8:00 a.m. - 5:00p.m. Monday - Friday

Payments and Customer Service are not offered

SERVICE EMERGENCY NUMBERS

Gas Trouble - 1-800-834-4300 Electric Trouble - 1-800-543-5599

CONDENSED VERSION

Due Date Amount Due Mar 12, 2019 \$ 164.37 Account Number 0000-0000-00-0 80 12 For more detailed billing information on your monthly bill, check box on right WinterCare Contribution Amount Enclosed (for Customer Assistance)

Sample Bill 100 Main St Covington KY 41014

PO Box 1326 Charlotte NC 28201-1326

Name	/Service Addr	663		Par	inquirie	a Call	Acce	Page 1 of 2 nunt Number
100 N	le Bill lain St gton KY 41014		Duke Ene	ergy		1-800-54	4-6900 0000	-0000-00-0
(i)	ayments To				Acc	euni Intern	ation	
PO Bo	ox 1326 otte NC 282	01-1326	Payments a Last payme				prepared on Feb d meter reading N	
lipter	Number	Readi From	ng Date To	Days	P	Meter Res revious	ding Present	Usage
Sas Sec	000000000	Jan 17 Jan 17		29 29		289 7157	414 7505	125 348
ias.	Residential			Cun	ent Eil	ling		
Curre	e - 125 CC Energy - Rate F ent Gas Charge Cost Recovery \$	RS s	\$ 118.62 \$ 118.62	Payr Bala Curr	ment(s) ance Forent Gas	Previous Bill Received brward s Charges ctric Charges		\$ 161.21 161.21 0.00 118.62 41.28

Elbetrio Stasidantial (************************************	
Usage - 348 kWh Duke Energy - Rate RS	\$ 41.28
Current Electric Charges	\$41.28

101	
Taxes	\$ 4.47

Current Billing	
Amt Due - Previous Bill Payment(s) Received	\$ 161.21 161.21ci
Balance Forward Current Gas Charges	0.00 118.62
Current Electric Charges Taxes	41.28 4.47
Current Amount Due	\$ 164.37

·Due Date	Amount Dus	Affe) Mar 12, 2019
Mar 12, 2019	\$ 164.37	\$ 170.73

Duke Energy Kentucky

Case No. 2018-00261

Staff First Set Post Hearing Data Requests

Date Received: February 8, 2019

STAFF-POST HEARING-DR-01-024

REQUEST:

Provide the number of Duke Kentucky customers that have opted out of receiving the full

bill to date.

RESPONSE:

Duke Energy Kentucky has not yet offered the condensed bill program as an "opt in"

program in Kentucky. The billing system functionality to enable customers to "opt in" to a

condensed bill is being programed. The Company was able to seamlessly and immediately

move customers to a detailed bill as per the Commission's order. However, switching the

condensed bill availability from an "opt out" program to an "opt in" program required

changes to the Company's Customer Information and billing systems. As a result, the

Company has not yet been able to make the condensed bill available to customers as an

"opt in" program and expects that to be completed in late first quarter/early second quarter

2019. The Company will provide sample bills for the condensed bill opt in program when

it is available.

PERSON RESPONSIBLE:

Suzanne Kesling

Staff First Set Post Hearing Data Requests

Date Received: February 8, 2019

STAFF-POST HEARING-DR-01-025

REQUEST:

Refer to Attachment D of the Joint Stipulation and Recommendation (Joint Stipulation).

a. Explain why the reconnection charge increase appears to be quantified in both the

present and proposed revenue columns.

b. Provide a revised Attachment D.

RESPONSE:

a. The increased reconnection charge appears in both the present and proposed

revenue columns because the settlement version of the revenue requirement model

includes the \$44,136 increase as an adjustment to revenues on Schedule D-2.25.

b. Please see STAFF-POST HEARING-DR-01-025 Attachment for a revised copy of

Stipulation Attachment D.

PERSON RESPONSIBLE:

James E. Ziolkowski

DUKE ENERGY KENTUCKY, INC.
GAS COST OF SERVICE STUDY
CASE NO: 2018-00261
CALCULATION PROPOSED REVENUE DISTRIBUTION
REFLECTING A PROPOSED REVENUE SUBSIDY/EXCESS ELIMINATION COMPONENT

WORK PAPER REFERENCE: WP FR-16(7)(y)-8 WITNESS RESPONSIBLE: JAMES E. ZIOLKOWSKI PAGE 1

Line No.	Rate Class	Rate Base (A)	Present Revenues (B) ⁽¹⁾	Net Operating Income (C)	Present ROR (D)	Present Revenues At Average ROR (E)	Inter Class Subsidization Overcollected (Undercollected) (F)	Inter Class Subsidization times 15.00% (G)	Rate Increase (allocated to class based on Rate Base) (H)	Proposed Revenues 85.00% Interclass Subsidization (i)	Proposed Percent Increase (J)	ROR At Proposed Rates (K)	Proposed Increase Less (Subsidy) Excess (L)
		FR-16(7)(v)-8	FR-16(7)(v)-8	WP - Pres NOI	(C) / (A)	(B) + (((D) Line 5 * (C))/(1-FIT))	(B) - (E)	(F) * 15.00%	(H) Line 5 * ((A) / (A) Line 5)	(B) - (G) + (H)	((H) - (G)) / (B)	((((H) - (G))*(1- FIT)+ (C)) / (A)	(H) - (G)
1	Rate RS	\$ 216,755,621	\$ 65,522,695	\$ 12,112,556	5.5881%	\$ 64,729,581	\$ 793,114	\$ 118,967	\$ 5,092,849	\$ 70,498,577	7.591%	7.400926%	\$ 4,973,882
2	Rate GS	71,593,514	23,198,247	1,512,368	2.1124%	26,086,108	(2,887,861)	(433,179)	1,682,147	25,313,573	9.119%	4.446597%	2,115,326
3	Rate FT-L	19,240,277	5,042,683	2,302,888	11.9691%	3,418,208	1,624,475	243,671	452,063	5,251,075	4.133%	12.824750%	208,392
4	Rate IT	5,834,165	1,524,248	680,670	11.6670%	1,053,976	470,272	70,541	137,076	1,590,783	4.365%	12.567913%	66,535
5	Total	\$ 313,423,577	\$ 95,287,873	\$ 16,608,482	5.2991%	\$ 95,287,873	\$.	\$.	\$ 7,364,142	\$ 102,652,008	7.728%	7.155222%	\$ 7,364,135

⁽¹⁾ Amounts for Rate RS and Rate GS include Gas Cost Adjustment revenues.

	MISCELLANEOUS REVENUES:		
6	Interdepartmental	27,765	27,765
7	Bad Check Charges	28,032	28,032
8	Reconnection Charges	22,068	66,204
9	Rents	14,496	14,496
10	No Notice Transp	603,445	603,445
11	Other Misc	1,896	1,896
12	Revenue Transp of Gas - Interco	0	0
13	Total Misc	697,702	741,838
14	Total Company	95,985,575	103,393,846

Duke Energy Kentucky
Case No. 2018-00261
Staff First Set Post Hearing Data Requests
Date Received: February 8, 2019

STAFF-POST HEARING-DR-01-026

REQUEST:

Provide an updated Schedule M reflecting any changes from the Join Stipulation.

RESPONSE:

See Attachment C electronically filed and burned to CD with the Joint Stipulation.

PERSON RESPONSIBLE:

Bruce L. Sailers

Staff First Set Post Hearing Data Requests Date Received: February 8, 2019

STAFF-POST HEARING-DR-01-027

REQUEST:

Refer to Attachment A of the Joint Stipulation, and provide all documentation and

spreadsheets utilized in calculating the total decreased of \$220,697 to the revenue

requirement for deferred integrity management expense deferral.

RESPONSE:

See STAFF-POST HEARING-DR-01-027 Attachment.

PERSON RESPONSIBLE:

Sarah Lawler

DUKE ENERGY KENTUCKY, INC. GAS DEPARTMENT CASE NO. 2018-00261 AMORTIZATION OF DEFERRED EXPENSE FOR THE TWELVE MONTHS ENDED MARCH 31, 2020

WPD-2.17a WITNESS RESPONSIBLE: S. E. LAWLER

Line No.	Account Number	Description	Reference	Amount (A)	Amort. Period	Annual Amortization (B)
				(\$)		(\$)
1	182715	Integrity Management Reg Asset - 5 year amortization with no carrying costs as filed in original application	(C)	2,887,115	5	577,423
		Integrity Management Reg Asset - 10 year amortization with carrying costs at LTD rate		2,887,115	10	356,726
		Decrease Due to Extending Amortization Period but adding Carrying Costs				(220.697)

⁽A) Source: Company Records.(B) Total amortization to Schedule D-2.17.(C) Deferral authority granted per Case No. 2016-00159.

Staff First Set Post Hearing Data Requests

Date Received: February 8, 2019

STAFF-POST HEARING-DR-01-028

REQUEST:

Refer to the Joint Stipulation, page 5, paragraph 7, in which it states that the parties agree

that Duke Kentucky "shall recover the actual costs of the pressure testing integrity

management deferral authorized in Case No. 2016-00159." Provide the specific monetary

amount that is agreed to in this portion of the Stipulation regarding the previously approved

deferrals for integrity management expense.

RESPONSE:

The Integrity Management Regulatory Asset is \$2,887,115 as shown on WPD-2.17a of the

Company's original application.

PERSON RESPONSIBLE:

Sarah Lawler

Staff First Set Post Hearing Data Requests

Date Received: February 8, 2019

STAFF-POST HEARING-DR-01-029

PUBLIC

REQUEST:

Refer to the Direct Testimony of Lane Kollen, page 19. Provide Duke Kentucky's and its

affiliates' salary and wage increases for calendar years 2015 through 2018, the base period

and the forecasted test period.

RESPONSE:

CONFIDENTIAL PROPRIETARY TRADE SECRET (As to Attachment Only)

For a schedule of annual wage increases for Duke Energy Kentucky and its affiliates see

"STAFF-POST HEARING-DR-01-029 Confidential Attachment". The Attachment is

being provided under seal of a Protective Order. Actual percentage increases are presented

for calendar years 2015 through 2018. All increases in 2018 occurred during the base

period. Amounts presented for 2019 and 2020 are forecasted unless they are incorporated

into a collective bargaining agreement. The effective date of the increase or planned

increase is included, but may fluctuate slightly from year to year based on payroll dates or

union contracts. Payroll expense, referenced in the Direct Testimony of Lane Kollen, on

page 19, is impacted by various components outside of annual wage increases. Employee

headcount, overtime hours and weather or storm events are examples of factors impacting

payroll expense.

PERSON RESPONSIBLE:

Renee Metzler

CONFIDENTIAL PROPRIETARY TRADE SECRET

POST-HEARING STAFF-DR-01-029 CONFIDENTIAL ATTACHMENT

FILED UNDER SEAL

Staff First Set Post Hearing Data Requests

Date Received: February 8, 2019

STAFF-POST HEARING-DR-01-030

REQUEST:

With regard to Duke Kentucky's proposed Weather Normalization Adjustment (WNA)

Rider tariff and mechanism, state whether data from the 41 months referenced in the

Passty Direct Testimony, beginning on line 16 of page 13, is used in any way to adjust

the 30-year Normal Degree Day calculation defined in the proposed WNA tariff. If not,

state whether 41 months of class customer usage and temperature in the calculation of the

Residential and General Service classes' Base Load (BL) and Heat Sensitivity Factor

(HSF), which are established in this proceeding and which will be used until established

again in Duke Kentucky's next base rate proceeding.

RESPONSE:

Please refer to Mr. Sailers' response to STAFF-POST HEARING-DR-01-031 for more

detail. As a quick summary, expected weather conditions (i.e., 30-year normal degree

days) are calculated using the 30-year normal procedure, while estimation of how volume

varies with weather was performed using the 41 months of customer class usage and

weather data. The latter model generated the "Base Load" and "Heat Sensitivity Factors"

as described.

PERSON RESPONSIBLE:

Benjamin W. B. Passty

Staff First Set Post Hearing Data Requests

Date Received: February 8, 2019

STAFF-POST HEARING-DR-01-031

REQUEST:

State whether Duke Kentucky believes that aligning its proposed WNA tariff more

closely with that of Atmos would cause its BL and HSF calculation to be based on

inappropriately short periods, as Atmos's WNA tariff states that it will calculate its

customer classes' BL and HSF annually.

RESPONSE:

Duke Energy Kentucky does not believe that aligning its proposed WNA tariff more

closely with that of Atmos would cause inappropriate calculations of the BL and HSF.

However, for clarity, Duke Energy Kentucky's WNA tariff calculations and the

reasoning behind using the proposed 41 months of data to calculate the BL and HSF

factors is as follows:

Duke Energy Kentucky proposes the following WNA formula calculations consistent

with witnesses Passty's and Sailers' testimony.

- Normal Heating Degree Days: The normal heating degree days expected over a

billing period are calculated using a 30-year average process. This is the same

30-year average process used to calculate forecast consumption in the test period

under normal weather conditions. The normal heating degree day values proposed

in this case will continue to be used with Rider WNA calculations until such time

that different values are adopted by a Commission order.

BL and HSF Factors: The BL and HSF factors model how customer consumption

changes based on heating degree days. A limited amount of information is desired

to calculate these factors so that influencers such as income levels, economic

activity, and energy efficiency impacts do not have to be accounted for and

estimated. Using a short period of time better isolates how heating degree days

influence gas consumption, with little variation in economic conditions. Duke

Energy Kentucky used 41 months of data to calculate the BL and HSF values,

motivated by a desire to promote the stability of the estimated values and to

improve the model. For comparison, Atmos uses 12 months of data to calculate

their BL and HSF values. In addition, Atmos calculates their BL and HSF

annually so that the values are refreshed for each heating season. Duke Energy

Kentucky also proposes to calculate the BL and HSF factors annually so they are

refreshed for each heating season.

At the Commission's determination, Duke Energy Kentucky would accept the use of 12

months of data to calculate the BL and HSF factors similar to Atmos. However, the

Company prefers to use its proposed 41-month period. The Company does not desire to

use a longer period of time to calculate the HSF and BL parameters for the reasons stated

above.

PERSON RESPONSIBLE:

Bruce L. Sailers