

VERIFICATION

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 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 20<sup>th</sup> day of July, 2019.

  
NOTARY PUBLIC

My Commission Expires: July 8, 2022



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

**KyPSC Case No. 2018-00370**  
**TABLE OF CONTENTS**

<b><u>DATA REQUEST</u></b>	<b><u>WITNESS</u></b>	<b><u>TAB NO.</u></b>
AG-DR-01-001	Cindy Givens .....	1
AG-DR-01-002	Cindy Givens .....	2
AG-DR-01-003	Cindy Givens .....	3
AG-DR-01-004	Cindy Givens .....	4

**Duke Energy Kentucky**  
**Case No. 2018-00370**  
**Attorney General First Set Data Requests**  
**Date Received: July 15, 2019**

**AG-DR-01-001**

**REQUEST:**

Reference the direct testimony of Cindy Givens, page 4. Explain the process by which; 1) Duke Energy Kentucky employees, 2) Duke Energy Kentucky customers and 3) Duke Energy Kentucky Shareholders, provide Wintercare contributions.

**RESPONSE:**

Under the Wintercare program, Duke Energy Kentucky employees and customers may contribute to Wintercare in any of the following ways:

- a) by writing their donation amount in the designated section on their paper bill;
- b) by mailing a check or money order to the Wintercare program; and/or,
- c) by entering their donation amount in the designed section when making a payment online if they are a paperless billing customer.

Duke Energy Kentucky provides a dollar for dollar match through shareholder funding up to \$25,000 annually in Wintercare. In addition, since 2005, as part of the three-year HEA approval applications, Duke Energy Kentucky has also committed to an additional \$25,000 in shareholder funding for the Wintercare program. The \$25,000 matching funds and the \$25,000 funding commitment are accounted for "below the line" in a FERC 426 account.

**PERSON RESPONSIBLE:**           Cindy Givens

**REQUEST:**

Reference the direct testimony of Cindy Givens, pages 5-6.

- a. Under DEK's current proposal, provide the total annual amount shareholders will contribute to HEA or HEA-related ventures, broken out by program. Further, explain whether the total amount described above will be met each year, may be met each year, or may vary or be approximate each year.
- b. Explain and provide support for the derivation of the \$99 amount described between lines 15-30 on page 5.
- c. Explain how DEK will determine the amount of monthly assistance provided to electric only or both electric and gas customers for the seven months listed.
- d. Explain and provide support for the derivation of the \$231 amount described between line 21 on page 5 and line 2 on page 6.
- e. Explain how DEK will determine the amount of monthly assistance provided to natural gas service only customers for the three months listed.
- f. For customers receiving ongoing assistance, is there only a monthly cap, or is there also a program year cap per customers on HEA assistance?

**RESPONSE:**

- a. Duke Energy Kentucky is not proposing any changes to its Wintercare contributions. The Company is proposing additional annual Shareholder contributions of \$100,000 for the revised HEA program. Of that new \$100,000

commitment, \$50,000 will be allocated to the HEA program for the bill assistance subsidy and the remaining \$50,000 will be allocated for Health & Safety Weatherization. The total amount described will be met each year.

- b. Duke Energy Kentucky's revised HEA program is modeled after similar successful programs in the state. The monthly \$99 subsidy was determined using the Department of Energy 2015 average cost per month for electric service in the Commonwealth of Kentucky (\$90-\$100) while also taking into consideration the fact that the majority of Duke Energy Kentucky's customers are combination gas and electric customers. Modifying the assistance from a crisis based program to an ongoing bill subsidy during specific months where energy usage is typically the highest due to weather, the hope is to encourage bill management and reduce the likelihood of disconnections. Customers with gas and electric service will receive the \$99.00 subsidy during the peak months for an annual total of \$693.00.
- c. The program would be a 12-month program. Annual enrollment/application period would be October/November with the 1<sup>st</sup> subsidy payment in December. Customers who enrolled later in the year would only receive subsidy payments for the remaining months after enrollment. All customers must re-enroll each year to confirm continued eligibility. Upon enrollment it will be determined if income eligible customers have electric only, natural gas and electric service, or natural gas service only. Eligible customers having electric only or combination electric and gas service will receive an ongoing bill subsidy of \$99.00 the peak heating and cooling months of December, January, February, March, July, August and September. Eligible natural gas only customers will receive \$173.25 for the four

specific winter heating months. This enables gas only customers to receive the same value of benefit in periods where their Duke Energy Kentucky utility cost is highest.

- d. Gas and electric customers are eligible for an annual subsidy of \$693.00 per program guidelines. Natural gas only customers will receive the same annual subsidy of \$693.00, however the monthly subsidy will be \$173.24 applied during the four specific months where energy usage is typically the highest due to weather to encourage bill management and reduce the likelihood of disconnections.
- e. See response to part d above.
- f. Electric customers (including combination electric and gas customers) have a monthly cap of \$99, for the seven subsidy months which results in an annual cap of \$693. Natural gas only customers have a monthly cap of \$173.25 for the four subsidy months which produces an annual cap of \$693.

**PERSON RESPONSIBLE:** Cindy Givens

**REQUEST:**

Reference the direct testimony of Cindy Givens, pages 6-7, wherein she describes the Weatherization and Safety fund.

- a. Provide a breakdown, by year, of the 104 low-income customers that since 2016 "were unable to take advantage of ... weather assistance."
- b. Provide documentation that evidences the reason for which each of the 104 customers were denied the above-described assistance.
- c. Explain the safeguards in place to ensure the Weatherization and Safety fund amounts are prudently spent or guarantee that additional weatherization may be performed.
- d. For the homes weatherized by NKCAC as part of the program funded by Kentucky Housing Corporation, provide the average amount spent on a home to weatherize, by year for the past five (5) years.
- e. Are there other weatherization programs available to DEK customers other than the one described on page 7, including, but not limited to programs administered or funded by the Department of Energy? If so, explain.
- f. If "The Company anticipates that approximately 20 homes will be served each year," is it accurate to state that the Company expects an average of \$2,500 per home to be expended under the program? What is the maximum that can be spent on each home?



- g. Will DEK's proposed programs be permitted to borrow from each other in the case where one program is over-funded in a given year and another underfunded? If so, explain.
- h. Provide the agreement between DEK and NKCAC regarding the amount or extent to which NKCAC shall weatherize homes with the amounts provided by DEK.

**RESPONSE:**

- a. The 104 low-income customers that since 2016 “were unable to take advantage of...weather assistance,” are broken down in AG-DR-01-003(a) Attachment.
- b. See Attachment AG-DR-01-003(a) NKCAC has deferral records in the form of case notes, emails, dwelling reports, and/or deferral letters.
- c. **Corrected Deferral Conditions**

If a client has subsequently corrected issues/problems identified that constituted a deferral at the time of the dwelling needs evaluation/energy audit or the initial application/screening process, the following process will apply:

1. The items identified that caused the initial deferral determination must be verified as having been corrected. Verification may take the form of a document specifically listing all items that caused the deferral, and a description of the actions taken that corrected the problems/issues. This document must be signed/dated by the client and once verified, signed/dated by the Weatherization Director and/or a Certified Dwelling Needs Evaluator/Energy Auditor. The method of verification must also be disclosed on this document, i.e.: on-site verification at the client's home, etc.



2. An applicant will remain eligible for weatherization services for 12 months from the date of verified eligibility. In addition to step 1, eligibility must also be reassessed and verified again by examining the WX-800. If 12-15 months have passed from the date of verified eligibility, the household must show continued eligibility. A signed declaration of income statement for the previous three months may be used to update the WX-800 application, if necessary. If weatherization work has not begun after 15 months from the date of eligibility, the household must reapply in full.
3. Once items 1 and 2 have been satisfied, the client application will be allowed to be moved to the top, the next to be served, on the prioritization list.

d. Average cost per home for the past 5 years are as follows:

2014-2015: \$5,371.00

2015-2016: \$4,401.00

2016-2017: \$5,526.00

2017-2018: \$9,038.00

2018-2019: \$7,406.00

- e. Yes, the DOE's Weatherization Assistance Program and LIHEAP's Weatherization Program.
- f. Yes, it is accurate to state that NKCAC expects an average of \$2,500.00 per home to be expended under the program. The maximum that can be spent on each home is \$2,500.00.
- g. Duke Energy Kentucky believes this flexibility is desirable, but will abide by whatever the Commission determines.

h. There is no written agreement. The \$50,000 would be a grant provided to NKCAC each year as part of NKCAC's existing weatherization program funded by the Kentucky Housing Corporation and NKCAC will provide quarterly reporting on the repairs made to Duke Energy Kentucky. If the Commission determines that the Company should enter into a separate agreement for this, the Company is willing to do so with NKCAC.

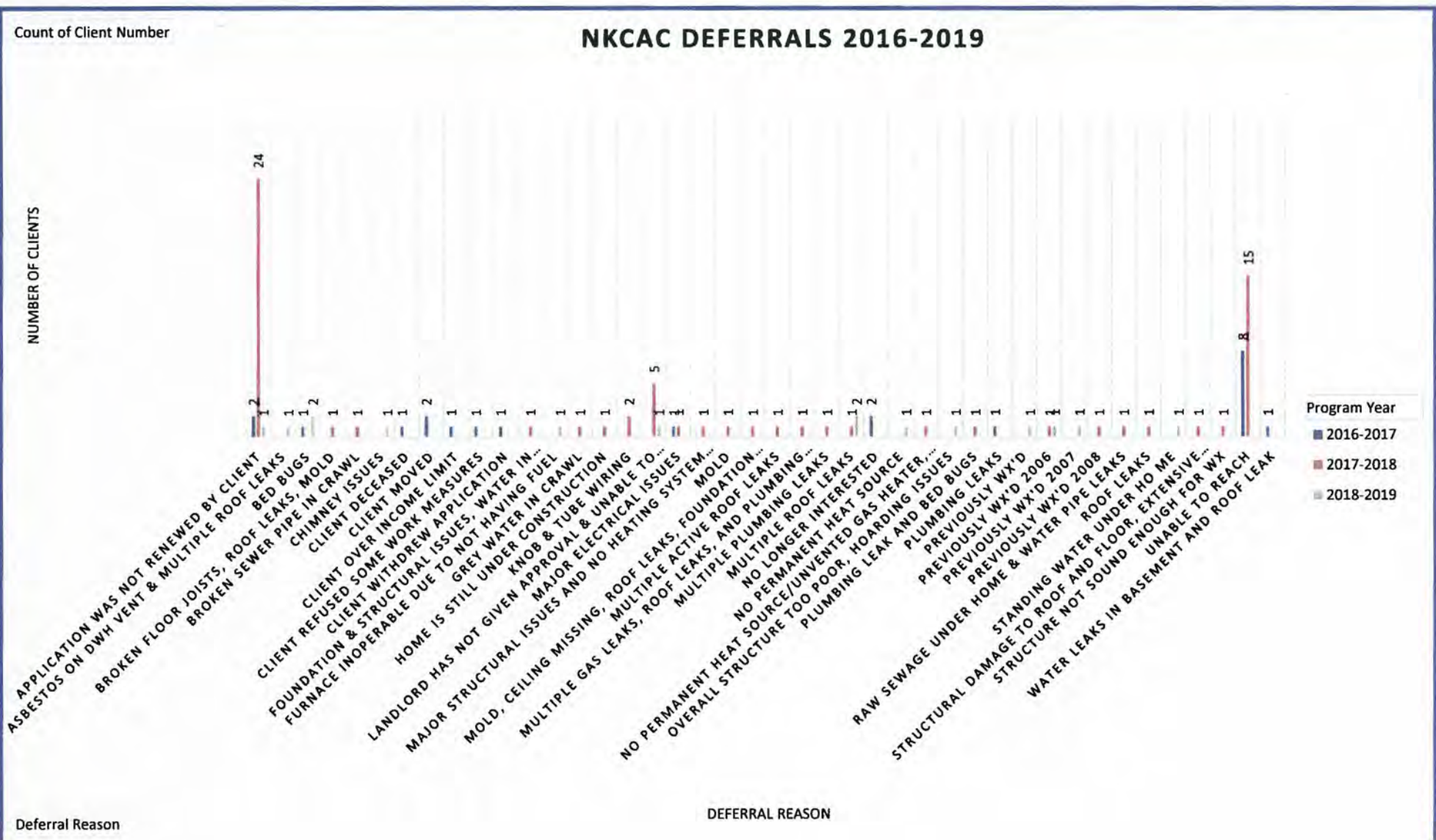
**PERSON RESPONSIBLE:** Cindy Givens

<u>Client Number</u>	<u>Deferral Reason</u>	<u>Deferral Documentation</u>	<u>Program Year</u>
22547164	Unable to reach	Dwelling Report	2016-2017
22547229	Client refused some work measures	Dwelling Report	2016-2017
22547242	Application was not renewed by client	Deferral Letter	2016-2017
22547291	Unable to reach	Dwelling Report	2016-2017
22547313	Unable to reach	Dwelling Report	2016-2017
22547350	Unable to reach	Dwelling Report	2016-2017
22547356	Bed Bugs	Dwelling Report	2016-2017
22547363	Client moved	Case Notes	2016-2017
22547364	Water leaks in basement and roof leak	Deferral Letter	2016-2017
22547364	Unable to reach	Dwelling Report	2016-2017
22547374	Client moved	Dwelling Report	2016-2017
22547396	Client withdrew application	Deferral Letter	2016-2017
22547406	No longer interested	Deferral Letter	2016-2017
22547411	Application was not renewed by client	Deferral Letter	2016-2017
22547434	Unable to reach	Dwelling Report	2016-2017
22547464	Client Deceased	Case Notes	2016-2017
22547472	No longer interested	Deferral Letter	2016-2017
22547514	Client over income limit	Deferral Letter	2016-2017
22548585	Plumbing Leaks	Dwelling Report	2016-2017
23744054	Major Electrical Issues	Dwelling Report	2016-2017
23830054	Unable to reach	Dwelling Report	2016-2017
23854053	Unable to reach	Dwelling Report	2016-2017
22547345	Application was not renewed by client	Deferral Letter	2017-2018
22547462	Major Electrical Issues	Dwelling Report	2017-2018
22547490	Application was not renewed by client	Deferral Letter	2017-2018
22547509	Application was not renewed by client	Deferral Letter	2017-2018
22547513	Application was not renewed by client	Deferral Letter	2017-2018
22547518	Unable to reach	Deferral Letter	2017-2018
22547519	Unable to reach	Deferral Letter	2017-2018
22547521	Application was not renewed by client	Deferral Letter	2017-2018
22547524	Application was not renewed by client	Deferral Letter	2017-2018
22547527	Application was not renewed by client	Deferral Letter	2017-2018
22547528	Application was not renewed by client	Deferral Letter	2017-2018
22547533	Application was not renewed by client	Deferral Letter	2017-2018
22547538	Unable to reach	Deferral Letter	2017-2018
22547546	Multiple plumbing leaks	Dwelling Report	2017-2018

22547552 Broken floor joists, roof leaks, mold	Dwelling Report	2017-2018
22547555 Previously wx'd 2006	Deferral Letter	2017-2018
22547556 Structure not sound enough for wx	Dwelling Report	2017-2018
22547559 Application was not renewed by client	Deferral Letter	2017-2018
22547562 Mold	Dwelling Report	2017-2018
22547564 Application was not renewed by client	Deferral Letter	2017-2018
22547567 Application was not renewed by client	Deferral Letter	2017-2018
22548573 Application was not renewed by client	Deferral Letter	2017-2018
22548575 Application was not renewed by client	Deferral Letter	2017-2018
22548577 Application was not renewed by client	Deferral Letter	2017-2018
22548578 Application was not renewed by client	Deferral Letter	2017-2018
22548579 Application was not renewed by client	Deferral Letter	2017-2018
22548583 Knob & Tube Wiring	Dwelling Report	2017-2018
22548584 Application was not renewed by client	Deferral Letter	2017-2018
22548588 Unable to reach	Deferral Letter	2017-2018
22548591 Mold, ceiling missing, roof leaks, foundation falling	Dwelling Report	2017-2018
22548594 Raw sewage under home & water pipe leaks	Dwelling Report	2017-2018
22548596 Unable to reach	Deferral Letter	2017-2018
22548599 Unable to reach	Deferral Letter	2017-2018
22548601 Application was not renewed by client	Deferral Letter	2017-2018
22548602 Multiple gas leaks, roof leaks, and plumbing leaks	Dwelling Report	2017-2018
22548609 Knob & Tube Wiring	Dwelling Report	2017-2018
22548610 Grey water in crawl	Dwelling Report	2017-2018
25708053 Multiple active roof leaks	Dwelling Report	2017-2018
25708056 Home is still under construction	Dwelling Report	2017-2018
25708065 Landlord has not given approval & unable to reach client	Deferral Letter	2017-2018
25708066 Roof leaks	Deferral Letter	2017-2018
25708067 Plumbing leak and bed bugs	Dwelling Report	2017-2018
25708069 Landlord has not given approval & unable to reach client	Deferral Letter	2017-2018
25708078 Foundation & structural issues, water in basement	Dwelling Report	2017-2018
25708083 Unable to reach	Deferral Letter	2017-2018
25708087 Landlord has not given approval & unable to reach client	Deferral Letter	2017-2018
25708090 Unable to reach	Deferral Letter	2017-2018
25708103 Previously wx'd 2008	Deferral Letter	2017-2018
25708105 Unable to reach	Deferral Letter	2017-2018
25708106 Landlord has not given approval & unable to reach client	Deferral Letter	2017-2018
25708107 Landlord has not given approval & unable to reach client	Deferral Letter	2017-2018

25708111 Unable to reach	Deferral Letter	2017-2018
25708123 Broken sewer pipe in crawl	Dwelling Report	2017-2018
25708127 Structural damage to roof and floor, extensive lead paint, broken windows	Dwelling Report	2017-2018
25708134 Multiple roof leaks	Dwelling Report	2017-2018
25708203 Unable to reach	Deferral Letter	2017-2018
25708211 No permanent heat source/unvented gas heater, gas leak, moisture issues	Case Notes	2017-2018
257080854 Major structural issues and no heating system or electric in home	Email & work order	2017-2018
25708172 Unable to reach	Email	2017-2018
25708180 Application was not renewed by client	Deferral Letter	2017-2018
22547532 Application was not renewed by client	Deferral Letter	2017-2018
22547523 Unable to reach	Deferral Letter	2017-2018
22547545 Unable to reach	Deferral Letter	2017-2018
22547544 Application was not renewed by client	Deferral Letter	2017-2018
22547537 Application was not renewed by client	Deferral Letter	2017-2018
25708092 Unable to reach	Deferral Letter	2017-2018
22547536 Application was not renewed by client	Deferral Letter	2017-2018
6909 Bed Bugs	Email	2018-2019
22547563 Furnace inoperable due to not having fuel	Deferral Letter	2018-2019
25708074 Application was not renewed by client	Deferral Letter	2018-2019
25708079 Previously wx'd 2007	Dwelling Report	2018-2019
25708084 Chimney issues	Dwelling Report	2018-2019
25708114 Multiple roof leaks	Dwelling Report	2018-2019
25708116 Previously wx'd	Dwelling Report	2018-2019
25708167 Asbestos on DWH vent & multiple roof leaks	Dwelling Report	2018-2019
25708174 Previously wx'd 2006	Deferral Letter	2018-2019
25708178 Bed bugs	Deferral Letter	2018-2019
25708218 Standing water under ho me	Dwelling Report	2018-2019
25708221 Multiple roof leaks	Dwelling Report	2018-2019
25708224 Overall structure too poor, hoarding issues	Dwelling Report	2018-2019
25708275 No permanent heat source	Dwelling Report	2018-2019
257080195 Landlord has not given approval & unable to reach client	Deferral Letter	2018-2019





**REQUEST:**

Reference the direct testimony of Cindy Givens, Attachment B.

- a. Explain what Energy Saver Events are.
- b. Explain what advertisements DEK are expected to produce for its proposed HEA programs.
- c. Provide the cost estimates and support for DEK's and NKCAC's advertisements for the proposed HEA programs.
- d. Explain if advertising costs for the proposed HEA programs are recoverable by NKCAC and DEK.

**RESPONSE:**

- a. Duke Energy Kentucky, in partnership with NKCAC intends to hold public awareness events in the community, including for other non-profit organizations in the Company's service territory to provide education and information regarding the HEA program, Wintercare, Weatherization programs that are available. Duke Energy Kentucky also intends to provide energy efficiency information as well.
- b. Duke Energy Kentucky will include bill inserts, email, newsletters, social media promotion, website updates, and annual/seasonal news releases. NKCAC will develop a creative program specific flyer to promote HEA on their website and social media. NKCAC will also contact all families served and inform them of the



program and invite them to come to the centers to learn more about the HEA program. NKCAC will send out HEA information through mail and email.

- c. The Company anticipates the budget to be less than \$20,000 annually.
- d. These costs would be considered normal O&M and would not be included in the Company's DSM or taken out of program funding. NKCAC will have very minimal costs associated with raising awareness of the program and those costs will not be recoverable.

**PERSON RESPONSIBLE:** Cindy Givens