

**COMMONWEALTH OF KENTUCKY**

**BEFORE THE**

**PUBLIC SERVICE COMMISSION**

In the Matter of: )  
 )  
THE ANNUAL COST RECOVERY FILING ) Case No. 2018-00370  
FOR DEMAND SIDE MANAGEMENT BY )  
DUKE ENERGY KENTUCKY, INC. )

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**DUKE ENERGY KENTUCKY, INC.’S  
REPLY BRIEF**

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Comes now Duke Energy Kentucky, Inc. (Duke Energy Kentucky or Company), by counsel, pursuant to the Commission’s August 1, 2019 post-hearing scheduling order, and does hereby offer the following reply brief in support of its proposed updated Home Energy Assistance (HEA) Program, respectfully stating as follows:

Following the filing of Duke Energy Kentucky’s brief on August 30, 2019, the Attorney General and Northern Kentucky Community Action Council (NKCAC) both filed response briefs. The Attorney General agreed with the Company that the proposed HEA Program changes are an “improvement” from the existing program and recommended that the proposal be approved.<sup>1</sup> NKCAC similarly voiced support for accepting Duke Energy Kentucky’s proposal.<sup>2</sup> Also, on September 11, 2019, the Commission entered an Order in Case No. 2019-00295, which stated: “The Commission intends to initiate an administrative case in which all low-income assistance

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<sup>1</sup> See Attorney General’s Response Brief, pp. 1, 6 (Sept. 13, 2019).

<sup>2</sup> See Northern Kentucky Community Action Council’s Comments (Sept. 13, 2019).

programs operated by investor-owned utilities will be examined in order to achieve uniformity in benefits and enable better access to these programs by low-income ratepayers.”<sup>3</sup>

Based upon these developments, Duke Energy Kentucky continues to believe that the proposed HEA Program will benefit customers and should be approved as described in the Company’s initial brief. The Company also welcomes the opportunity to discuss further modifications to the HEA Program as part of the forthcoming administrative case involving all investor-owned utilities. It is anticipated that the administrative case will be a suitable venue for addressing the Attorney General’s additional comments filed in this docket. Indeed, Duke Energy Kentucky designed the new HEA Program around a one-year written agreement specifically so incremental improvements in the program could be made on an annual basis as additional experience is gained each year.

WHEREFORE, on the basis of the foregoing, Duke Energy Kentucky respectfully requests the Commission to approve the revised HEA Program as proposed and to grant all other relief to which the Company has requested and is entitled.

Done this 20<sup>th</sup> day of September, 2019.

Respectfully submitted,

Rocco O. D’Ascenzo (92796)  
Deputy General Counsel  
Duke Energy Business Services LLC  
139 East Fourth Street,  
Cincinnati, Ohio 45201  
Phone: (513) 287-4320  
Fax: (513) 287-4385  
E-mail: rocco.d’ascenzo@duke-energy.com

And

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<sup>3</sup> See *In the Matter of the Electronic Application of Kentucky Power Company to: 1) Modify Kentucky Power Company’s Residential Energy Assistance Program; 2) Approve the Amended Operating Agreement; and 3) Grant all Other Relief to Which it May Be Entitled*, Order, Case No. 2019-00295 (Ky. P.S.C. Sept. 11, 2019).



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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  
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 September 20, 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 is being hand delivered to the Commission within two business days.



*Counsel for Duke Energy Kentucky, Inc.*