

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC ANNUAL COST RECOVERY	)	
FILING FOR DEMAND SIDE MANAGMENT	)	CASE NO.
BY DUKE ENERGY KENTUCKY, INC.	)	2018-00370

**ATTORNEY GENERAL’S POST-HEARING DATA REQUESTS**

Comes now the intervenor, the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention (“Attorney General”), and pursuant to the Kentucky Public Service Commission (“Commission”)’s August 1, 2019 Order, tenders these Post-Hearing Data Requests to Duke Energy Kentucky, Inc. (“DEK” or “the Company”) to be answered by the date specified by Commission order, and in accordance with the following:

- (1) In each case where a request seeks data provided in response to a staff request, reference to the appropriate request item will be deemed a satisfactory response.
- (2) Identify the witness who will be prepared to answer questions concerning each request.
- (3) Repeat the question to which each response is intended to refer. The Office of the Attorney General can provide counsel with an electronic version of these questions, upon request.
- (4) These requests shall be deemed continuing so as to require further and supplemental responses if the company receives or generates additional information within the scope of these requests between the time of the response and the time of any hearing conducted hereon.
- (5) Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association, be accompanied by a signed certification

of the preparer or person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

(6) If you believe any request appears confusing or ambiguous, request clarification directly from Counsel for the Office of Attorney General.

(7) To the extent that the specific document, workpaper or information as requested does not exist, but a similar document, workpaper or information does exist, provide the similar document, workpaper, or information.

(8) To the extent that any request may be answered by way of a computer printout, identify each variable contained in the printout which would not be self-evident to a person not familiar with the printout.

(9) If the company has objections to any request on the grounds that the requested information is proprietary in nature, or for any other reason, notify the Office of the Attorney General as soon as possible.

(10) As used herein, the words "document" or "documents" are to be construed broadly and shall mean the original of the same (and all non-identical copies or drafts thereof) and if the original is not available, the best copy available. These terms shall include all information recorded in any written, graphic or other tangible form and shall include, without limiting the generality of the foregoing, all reports; memoranda; books or notebooks; written or recorded statements, interviews, affidavits and depositions; all letters or correspondence; telegrams, cables and telex messages; contracts, leases, insurance policies or other agreements; warnings and caution/hazard notices or labels; mechanical and electronic recordings and all information so stored, or transcripts of such recordings; calendars, appointment books,

schedules, agendas and diary entries; notes or memoranda of conversations (telephonic or otherwise), meetings or conferences; legal pleadings and transcripts of legal proceedings; maps, models, charts, diagrams, graphs and other demonstrative materials; financial statements, annual reports, balance sheets and other accounting records; quotations or offers; bulletins, newsletters, pamphlets, brochures and all other similar publications; summaries or compilations of data; deeds, titles, or other instruments of ownership; blueprints and specifications; manuals, guidelines, regulations, procedures, policies and instructional materials of any type; photographs or pictures, film, microfilm and microfiche; videotapes; articles; announcements and notices of any type; surveys, studies, evaluations, tests and all research and development (R&D) materials; newspaper clippings and press releases; time cards, employee schedules or rosters, and other payroll records; cancelled checks, invoices, bills and receipts; and writings of any kind and all other tangible things upon which any handwriting, typing, printing, drawings, representations, graphic matter, magnetic or electrical impulses, or other forms of communication are recorded or produced, including audio and video recordings, computer stored information (whether or not in printout form), computer-readable media or other electronically maintained or transmitted information regardless of the media or format in which they are stored, and all other rough drafts, revised drafts (including all handwritten notes or other marks on the same) and copies of documents as hereinbefore defined by whatever means made.

(11) For any document withheld on the basis of privilege, state the following: date; author; addressee; indicated or blind copies; all persons to whom distributed, shown, or explained; and, the nature and legal basis for the privilege asserted.

(12) In the event any document called for has been destroyed or transferred beyond the control of the company, state: the identity of the person by whom it was destroyed or transferred, and the person authorizing the destruction or transfer; the time, place, and method of destruction or transfer; and, the reason(s) for its destruction or transfer. If destroyed or disposed of by operation of a retention policy, state the retention policy.

(13) Provide written responses, together with any and all exhibits pertaining thereto, in one or more bound volumes, separately indexed and tabbed by each response, in compliance with Kentucky Public Service Commission Regulations.

(14) “And” and “or” should be considered to be both conjunctive and disjunctive, unless specifically stated otherwise.

(15) “Each” and “any” should be considered to be both singular and plural, unless specifically stated otherwise.

Respectfully submitted,

ANDY BESHEAR  
ATTORNEY GENERAL



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*Certificate of Service and Filing*

Counsel certifies that: (a) the foregoing is a true and accurate copy of the same document being filed in paper medium; (b) pursuant to 807 KAR 5:001 § 8(7), there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and (c) the original in paper medium is being filed with the Commission no later than the second day after this electronic filing. I further certify that the foregoing is being contemporaneously provided via electronic mail to:

Hon. L. Allyson Honaker  
[Allyson@gosssamfordlaw.com](mailto:Allyson@gosssamfordlaw.com)

Hon. David S. Samford  
[David@gosssamfordlaw.com](mailto:David@gosssamfordlaw.com)

Rocco O. D'Ascenzo  
[Rocco.D'Ascenzo@duke-energy.com](mailto:Rocco.D'Ascenzo@duke-energy.com)

This 2<sup>nd</sup> day of August, 2019



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Assistant Attorney General

Electronic Annual Cost Recovery Filing for Demand Side  
Management by Duke Energy Kentucky, Inc.  
Case No. 2018-00370  
Attorney General's Post-Hearing Data Requests

1. Reference the July 31, 2019 Video Testimony Evidence (“VTE”) at 11:55:28-11:56:23. Provide the script(s), prompt(s), information or document(s) that DEK’s customer service representatives see and/or use to inform customers who contact DEK regarding their inability to pay, that financial assistance is available based on income, and provide Northern Kentucky Community Action Council’s contact information.
2. Reference the document following this request and the July 31, VTE at 2:01:36. Confirm that the Amy Spiller who appeared as a witness before the Commission at the hearing in this matter, is the same Amy Spiller who substituted as counsel of record for DEK in Case No. 2008-00100.

RECEIVED

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PUBLIC SERVICE  
COMMISSION

COMMONWEALTH OF KENTUCKY

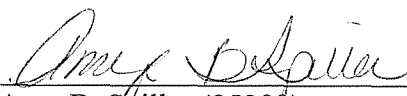
BEFORE THE PUBLIC SERVICE COMMISSION

In The Matter Of:	)	
	)	
THE APPLICATION OF	)	CASE No. 2008-00100
DUKE ENERGY KENTUCKY, INC.,	)	
TO RE-INSTITUTE A HOME ENERGY	)	
ASSISTANCE PROGRAM	)	

NOTICE OF SUBSTITUTION OF COUNSEL

PLEASE TAKE NOTICE that Amy B. Spiller, Associate General Counsel of Duke Energy Shared Services, Inc. is hereby substituted for John J. Finnigan, Jr., of Duke Energy Corp., as counsel of record for Duke Energy Kentucky, Inc. in the above styled matter.

Respectfully Submitted,



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 Amy B. Spiller (85309)  
 Associate General Counsel  
 Duke Energy Kentucky, Inc.  
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 P.O. Box 960  
 Cincinnati, Ohio 45201-0960  
 Phone: (513)419-1810  
 Fax: (513)419-1846  
 Email: amy.spiller@duke-energy.com

**CERTIFICATE OF SERVICE**

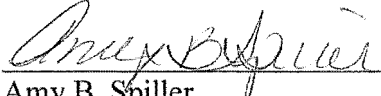
I hereby certify that a copy of the foregoing filing was served on the following via ordinary United States mail, postage prepaid, this 8<sup>th</sup> day of April, 2008:

Paul Adams, Assistant Attorney General  
The Kentucky Office of the Attorney General  
1024 Capital Center Drive  
Frankfort, Kentucky 40602-2000

Anita L. Mitchell  
Public Service Commission  
211 Bower Boulevard  
Frankfort, Kentucky 40602

Florence W. Tandy  
Northern Kentucky Community Action Commission  
P.O. Box 193  
Covington, Kentucky 41012

Carl Melcher  
Northern Kentucky Legal Aid, Inc.  
302 Greenup  
Covington, Kentucky 41011

  
Amy B. Spiller