

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

THE APPLICATION OF DUKE ENERGY)
KENTUCKY, INC. TO AMEND ITS)
DEMAND SIDE MANAGEMENT)
PROGRAMS) Case No. 2019-00277

**DUKE ENERGY KENTUCKY, INC.'S FIRST SET OF
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF
DOCUMENTS PROPOUNDED UPON THE ATTORNEY GENERAL**

Comes now Duke Energy Kentucky, Inc. (Duke Energy Kentucky), and addresses the following First Set of Data Requests to the Attorney General of the Commonwealth of Kentucky, Office of Rate Intervention (Attorney General) to be answered by the date specified in the Commission's Order of Procedure, and in accordance with the following instructions:

I. DEFINITIONS AND INSTRUCTIONS

1. With respect to each discovery request, all information is to be divulged that is within the knowledge, possession or control of the parties to whom it is addressed, including their agents, employees, attorneys and/or investigators.
2. Please identify the witness(es) who will be prepared to answer questions concerning each request.
3. 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.

4. All answers must be separately and fully stated in writing under oath.
5. Where an interrogatory calls for an answer in more than one part, each part should be separated in the answer so that the answer is clearly understandable.
6. For purpose of these discovery requests, the following terms shall have meanings set forth below:

(a) As used herein, "document," "documentation" and/or "record," whether stated as the singular or the plural, means any course of binders, book, pamphlet, periodical, letter, correspondence, memoranda, including but not limited to, any memorandum or report of a meeting or telephone or other conversation, invoice, account, credit memo, debit memo, financial statement, general ledger, ledger, journal, work papers, account work papers, report, diary, telegram, record, contract, agreement, study, draft, telex, handwritten or other note, sketch, picture, photograph, plan, chart, paper, graph, index, tape, data processing card, data processing disc, data cells or sheet, check acceptance draft, e-mail, studies, analyses, contracts, estimates, summaries, statistical statements, analytical records, reports and/or summaries of investigations, opinions or reports of consultants, opinions or reports of accountants, trade letters, comparisons, brochures, pamphlets, circulars, bulletins, notices, forecasts, electronic communication, printouts, all other data compilations from which information can be obtained (translated if necessary by defendants into usable form), any

preliminary versions, drafts or revisions of any of the foregoing, and/or any other written, recorded, transcribed, punched, taped, filmed or graphic matter, however produced or reproduced and regardless of origin or location, in the possession, custody and/or control of the defendant and/or their agents, accountants, employees, representatives and/or attorneys. "Document" and "record" also mean all copies of documents by whatever means made, if the copy bears any other markings or notations not found on the original.

- (b) The terms "relating to," "referring to," "referred to," "pertaining to," "pertained to" and "relates to" means referring to, reporting, embodying, establishing, evidencing, comprising, connected with, commenting on, responding to, showing, describing, analyzing, reflecting, presenting and/or constituting and/or in any way involving.
- (c) The terms "and," "or," and "and/or" within the meaning of this document shall include each other and shall be both inclusive and disjunctive and shall be construed to require production of all documents, as above-described, in the broadest possible fashion and manner.
- (d) The term "Attorney General" shall mean Attorney General of the Commonwealth of Kentucky, Office of Rate Intervention, and shall include, but is not limited to, each and every agent, employee,

servant, insurer and/or attorney of the Attorney General. The term “you” shall be deemed to refer to the Attorney General.

- (e) The term “Commission” shall mean the Kentucky Public Service Commission.
- (f) The term “Duke Energy Kentucky” shall mean Duke Energy Kentucky, Inc., its employees, agents, officers, directors and representatives.
- (g) To “identify” shall mean:
 - (1) With respect to a document, to state its date, its author, its type (for example, letter, memorandum, chart, photograph, sound reproduction, etc.), its subject matter, its present location, and the name of its present custodian. The document may be produced in lieu of supplying the foregoing information. For each document which contains information as privileged or otherwise excludable from discovery, there shall be included a statement as to the basis for such claim of privilege or other grounds for exclusion.
 - (2) With regard to a natural person, to state his or her full name, last known employer or business affiliation, title and last known home address.
 - (3) With regard to a person other than a natural person, state the title of that person, any trade name, or corporate name or partnership name used by that person, and the principal

business address of that person.

- (h) To “produce” or to “identify and produce,” shall mean that the Attorney General shall produce each document or other requested tangible thing. For each tangible thing which the Attorney General contends are privileged or otherwise excludable from discovery, there shall be included a statement as to the basis for such claim of privilege or other grounds for exclusion.
- (i) The terms “Party or Parties” shall mean any organization, person, corporation, entity, etc., which intervened in the above-captioned proceeding and shall further include the Kentucky Public Service Commission Staff.

II. REQUESTS FOR INFORMATION

1. Other than Mr. Alvarez, please identify any persons, including experts whom the Attorney General has consulted, retained, or is in the process of retaining with regard to evaluating the Company’s Application in this proceeding.

RESPONSE:

2. For each person identified in (prior) response to Interrogatory No. 1 above, please state (1) the subject matter of the discussions/consultations/evaluations; (2) the written opinions of such persons regarding the Company’s Application; (3) the facts to which each person relied upon; and (4) a summary of the person’s qualifications to render such discussions/consultations/evaluations.

RESPONSE:

3. For each person identified in response to Interrogatory No. 1 above, please identify all proceedings in all jurisdictions in which the witness/persons has offered evidence, including but not limited to, pre-filed testimony, sworn statements, and live testimony. For each response, please provide the following:

- (a) The jurisdiction in which the testimony or statement was pre-filed, offered, given, or admitted into the record;
- (b) The administrative agency and/or court in which the testimony or statement was pre-filed, offered, admitted, or given;
- (c) The date(s) the testimony or statement was pre-filed, offered, admitted, or given;
- (d) The identifying number for the case or proceeding in which the testimony or statement was pre-filed, offered, admitted, or given; and,
- (e) Whether the person was cross-examined.

RESPONSE:

4. Identify and provide all documents or other evidence that the Attorney General may seek to introduce as exhibits or for purposes of witness examination in the above-captioned matter.

RESPONSE:

5. Please provide copies of any and all presentations made by Mr. Alvarez within the last three years involving or relating to the following: 1) demand side management; and 2) costs of participating in PJM, including capacity and energy market evaluations.

RESPONSE:

6. Please confirm that Mr. Alvarez is not offering any opinions regarding any of the other aspects of the Company's Application in these proceedings.

(a) If the response is in the negative, please state Mr. Alvarez's position.

RESPONSE:

7. Please confirm that, other than the opinions offered by Mr. Alvarez, the Attorney General is not taking a position on any of the other aspects of the Company's filing in these proceedings.

(a) If the response is in the negative, please explain the Attorney General's position.

RESPONSE:

8. Please identify all proceedings in all jurisdictions in which Paul Alvarez has offered evidence, including but not limited to, pre-filed testimony, sworn statements, and live testimony and analysis for the last three years. For each response, please provide the following:

- (a) the jurisdiction in which the testimony, statement or analysis was pre-filed, offered, given, or admitted into the record;
- (b) the docket by name and number; and,
- (c) whether a final commission decision order was issued and what date.

RESPONSE:

9. Please provide copies of the documents that are relevant to Mr. Alvarez's testimony in Case No. 2019-00277 listed in Appendix A: Curriculum Vitae of Paul Alvarez attached to Mr. Alvarez's testimony:

- (a) Critique of Smart Meter Benefits Claimed by Puget Sound Energy. November 22, 2019
- (b) Critique of Smart Meter Benefits Claimed by Rockland Electric Company. October 11, 2019
- (c) Critique of Grid Improvement Plan Proposed by Indianapolis Power and Light. October 7, 2019
- (d) Investigation into Distribution Planning Processes September 6, 2019
- (e) Regulatory Reform Proposal to Base a Significant Portion of Utility Compensation Performance in the Public Interest Testimony before

the Maryland PSC on behalf of the Coalition for Utility Reform.
December 8, 2014.

- (f) The Rush to Modernize: An Editorial on Distribution Planning and Performance Measurement. With Sean Ericson and Dennis Stephens. July 8, 2019
- (g) Modernizing the Grid in the Public Interest: Getting a Smarter Grid at the Least Cost for South Carolina Customers. Whitepaper co authored with Dennis Stephens for GridLab. January 31, 2019
- (h) Modernizing the Grid in the Public Interest: A Guide for Virginia Stakeholders. Whitepaper co-authored with Dennis Stephens for GridLab. October 5, 2018
- (i) Measuring Distribution Performance” Benchmarking Warrants your attention. With Sean Ericson. April 2018
- (j) Price Cap Electric Ratemaking: Does it Merit Consideration? With Bill Steele. October 2017.
- (k) Integrated Distribution Planning: An Idea Whose Time has Come November 2014.
- (l) Smart Grid Economic and Environmental Benefits: A Review and Synthesis of Research on Smart Grid Benefits and Costs. Secondary research report prepared for the Smart Grid Consumer Collaborative. October 8, 2013. Companion piece: Smart Grid Technical and Economic Concepts for Consumers.

- (m) Maximizing Customer Benefits: Performance Measurement and Action Steps for Smart Grid Investments. Public Utilities Fortnightly. January 2012.
- (n) Smart Grid Regulation: Why Should We Switch to Performance-based Compensation? Smart Grid News. August 15, 2014.
- (o) A Better Way to Recover Smart Grid Costs. Smart Grid News. September 3, 2014.
- (p) Is This the Future? Simple Methods for Smart Grid Regulation. Smart Grid News. October 2, 2014.
- (q) The True Cost of Smart Grid Capabilities. Intelligent Utility. June 30, 2014.
- (r) NASUCA Annual Meeting. Grid Modernization: Basic Technical Challenges Advocates should Assert. Orlando, FL. Nov. 13, 2018
- (s) NARUC Committee on Energy Resources and the Environment. *How big data can lead to better decisions for utilities, customers, and regulators.* Washington DC. February 15, 2016.
- (t) National Conference of Regulatory Attorneys 2014 Annual Meeting. *Smart Grid Hype & Reality.* Columbus, Ohio. June 16, 2014.
- (u) NASUCA 2013 Annual Conference. *A Review and Synthesis of Research on Smart Grid Benefits and Costs.* Orlando. November 18, 2013.

- (v) IEEE Power and Energy Society, ISGT 2013. *Distribution Performance Measures that Drive Customer Benefits*. Washington DC. February 26, 2013.
- (w) Great Lakes Smart Grid Symposium. *What Smart Grid Deployment Evaluations are Telling Us*. Chicago. September 26, 2012.
- (x) Mid-Atlantic Distributed Resource Initiative. *Smart Grid Deployment Evaluations: Findings and Implications for Regulators and Utilities*. Philadelphia. April 20, 2012.
- (y) DistribuTECH 2012. *Lessons Learned: Utility and Regulator Perspectives*. Panel Moderator. January 25, 2012.
- (z) DistribuTECH 2012. *Optimizing the Value of Smart Grid Investments*. Half-day course. January 23, 2012.
- (aa) NARUC Subcommittee on Electricity. *Maximizing Smart Grid Customer Benefits: Measurement and Other Implications for Investor-Owned Utilities and Regulators*. St. Louis. November 13, 2011.

RESPONSE:

10. Please provide copies of any and all documents, analysis, summaries, white papers, work papers, spreadsheets (electronic versions with cells intact), including drafts thereof, as well as any underlying supporting materials created by Mr. Alvarez:

- (a) as part of his evaluation of the Company's PTR-Pilot Program, and
- (b) any other aspect of the Company's Application in the above-styled proceeding reviewed by Mr. Alvarez.

RESPONSE:

11. Please provide copies of any and all documents not created by Mr. Alvarez, including but not limited to, analysis, summaries, cases, reports, evaluations, *etc.*, that Mr. Alvarez relied upon, referred to, or used in the development of his testimony.

RESPONSE:

12. Please clarify if it is Mr. Alvarez's position that a PTR should be part of the default rate/services for Duke Energy Kentucky's residential customers or all customers (residential and non-residential)?

- (a) If Mr. Alvarez's opinion is that the PTR should just be an element of the default rate for residential customers only, has Mr. Alvarez performed any analysis or study to determine what the impacts of such a default rate design would be upon the Company's cost of service to its residential customers who would also pay for such a credit though rates?
 - (1) If the answer is in the affirmative, please provide such analysis.

- (b) Has Mr. Alvarez performed any analysis of how a default PTR rate design for residential customers would impact any of the Company's other customer classes?
- (c) If Mr. Alvarez's opinion is that the PTR should be an element of the default rate for all customer classes, has Mr. Alvarez performed any analysis or study to determine what the impacts of such a default rate design would be to the customer rates that would also pay for such a credit?

RESPONSE:

13. Please refer to Page 7 of Mr. Alvarez's testimony recommending the PTR be added as a routine permanent component of Duke's standard residential rate. Is Mr. Alvarez advocating that the Kentucky Public Service Commission (KYPSC) do that in this case?

- (a) If the response is in the affirmative, is Mr. Alvarez aware of the settlement signed by the Kentucky Attorney General and approved by the Commission in Case No. 2016-00152 whereby the parties agreed to establish a *voluntary* PTR Pilot to last two years. (Emphasis added).

RESPONSE:

14. Please refer to page 8 of Mr. Alvarez's testimony where he mentions the Maryland Peak Time Rebate program. Is Mr. Alvarez aware of any other jurisdictions that have approved a default, mandatory, or otherwise non-voluntary peak time rebate rate design for utility residential customers?

- (a) If the response is in the affirmative, please provide all such jurisdictions, utilities names, dates of such regulatory order(s), case numbers where such designs were approved/ordered, and a copy of such an order.

RESPONSE:

15. Has Mr. Alvarez performed any study to determine the costs of implementing a default PTR program for Duke Energy Kentucky's electric customers?

- (a) If the response is in the affirmative, please provide such study.

RESPONSE:

16. Please state if Mr. Alvarez is aware of the Kentucky Public Service Commission (KYPSC) approving either: 1) a non-voluntary, default time of use rate for a utility's residential customers; or 2) a non-voluntary, default peak time rebate for a utility's residential customers.

- (a) If the answer is in the affirmative to either of items 1 or 2 above, please provide the date, Case No. and a copy of the Order approving the rate design.

RESPONSE:

17. Is Mr. Alvarez aware if the KYPSC has either: 1) previously rejected a non-voluntary time of use rate or a peak time rebate as a default for residential customers; or 2) previously offered an opinion on establishing a non-voluntary time of use rate or a peak time rebate as a default for the residential customer class?

- (a) If the answer is in the affirmative to either of items 1 or 2 above, please provide the date, Case No. and a copy of the Order approving the rate design.

RESPONSE:

18. On page 17 of his testimony, Mr. Alvarez acknowledges that the Peak Time Rebate program being proposed in this application was the result of a settlement with the Attorney General in Case No. 2016-00152. In the same section, he suggests that some of the parameters agreed to in the settlement with respect to the PTR program were “arbitrary.”

- (a) Is Mr. Alvarez suggesting in this testimony that the Kentucky Attorney General agreed to a settlement without forethought or consideration of the terms in the settlement?
- (b) Is Mr. Alvarez suggesting that the Kentucky Attorney General should withdraw from the settlement in Case No. 2016-00152?
- (c) If the response is in the affirmative, is the Kentucky Attorney General now advocating that the settlement agreed to in Case No. 2016-00152 be set aside by the Commission?

RESPONSE:

19. Does the Kentucky Attorney General believe the stipulation and recommendation in Case No. 2016-00152 was negotiated in good faith? If not, explain the reason(s) for your response.

RESPONSE:

20. Notwithstanding the opinions offered by its witness Mr. Alvarez, does the Kentucky Attorney General believe that Duke Energy Kentucky is free to change the terms of the stipulation and recommendation in Case No. 2016-00152 without the Kentucky Attorney General's agreement and KYPSC approval?

RESPONSE:

21. Notwithstanding the opinions offered by its witness Mr. Alvarez, does the Kentucky Attorney General still support the stipulation and recommendation in Case No. 2016-00152 negotiated in good faith with Duke Energy Kentucky and approved by the KYPSC?

RESPONSE:

22. Please identify any specific sections of the stipulation and recommendation in Case No. 2016-00152 where the Company's proposed PTR pilot program deviates from the agreed pilot parameters?

RESPONSE:

23. KY AG and Mr. Alvarez, do you agree that the following excerpts from page 9 and 10 of the stipulation and recommendation in Case No. 2016-00152 confirms that customers must elect, voluntarily, to participate in the PTR Pilot program?

- (a) Page 9: “The intent of the PTR Pilot will be to collect the information from **voluntary participants** (*emphasis added*) needed to properly evaluate the potential addition of a Peak Time Rebate program that could be made available to all eligible residential customers.”
- (b) Page 10: “The initial PTR Pilot shall be conducted for a two-year period and will be limited to the first one thousand (1,000) eligible residential customers **that enroll** (emp. added) in the program....”
- (c) Page 10: “As part of the registration/application process for **interested residential customers** (emp added),”

RESPONSE:

24. Is either the Kentucky Attorney General or its witness Mr. Alvarez aware that Duke Energy Kentucky provides smart meter customers access to hourly usage data online, and that this data is available to the customer the day after it is recorded?

RESPONSE:

25. Has Mr. Alvarez performed any cost-effectiveness analysis or study to determine if increasing the credit under the PTR-Pilot would pass any of the cost-effectiveness tests recognized by the KYPSC?

(a) If the answer is in the affirmative, please provide all such studies/analysis.

RESPONSE:

26. Does the Kentucky Attorney General and/or Mr. Alvarez believe that over payment of load reduction incentives in a PTR program that is subject to DSM cost effectiveness testing such as those used for evaluating Duke Energy Kentucky's energy efficiency and demand side management programs could lead to negative impacts on cost effectiveness scores for the program?

RESPONSE:

27. Please confirm whether the representative of the Kentucky Attorney General attended any of the Company's DSM Collaborative meetings during 2017 or 2018 when the PTR-Pilot was discussed?

RESPONSE:

28. Does the Kentucky Attorney General agree that Duke Energy Kentucky discussed the desire to limit the risk of overpayment of load reduction incentives during the DSM Collaborative meetings in 2017 and 2018 by requiring customers to reply to event notices and confirm that they will attempt to reduce their consumption during PTR hours?

RESPONSE:

29. Does Mr. Alvarez and the KY AG acknowledge that the Duke Energy Kentucky PTR program is specified as a DSM program in multiple locations on page 9 through 11 in the stipulation and recommendation in Case No. 2016-00152?

RESPONSE:

30. Mr. Alvarez proposes that the Commission conform the Peak Time Rebate Pilot program being proposed by Duke Energy Kentucky to an existing program offered in the State of Maryland.

- (a) Was the PTR program in Maryland offered initially as a pilot program with limited participation or was it offered to all customers from the beginning?
- (b) Was the rebate always \$1,250 per MWh or has it changed since inception of the program?
- (c) Please confirm that Maryland is a retail choice state where customers are able to shop in a competitive market for generation supply?
- (d) Is Mr. Alvarez aware that rates for electric service in Maryland are unbundled (generation is separated from distribution and transmission)?

- (e) Describe the impact of choice on the PTR program in Maryland, i.e., is the PTR program available to shopping and non-shopping customers; how are competitive suppliers affected by load reductions related to the PTR program, etc.?

RESPONSE:

31. In reference to the direct testimony of Witness Alvarez starting on page 18 line 13 and going through page 20 line 2:

- (a) On page 18 line 22, Mr. Alvarez cites a Locational Marginal Price (LMP) value of \$0.36/kWh. Does Mr. Alvarez suggest that the best practice for implementing PTR program critical peak events would be for an event duration of 1 hour?
- (b) Does Mr. Alvarez suggest that the best practice for implementing PTR program critical peak events would be to implement one single event per year?
- (c) On page 19 lines 7 and 8, Mr. Alvarez states an average “KW of power” for central air conditioning and electric clothes dryers. Please provide the analysis Mr. Alvarez relies upon to conclude that these appliances consume the stated amount of power each hour for all residential customers across all hours of the proposed Duke Energy Kentucky peak time period for which the PTR program would be implemented (i.e. proposed to be 3 pm to 7 pm in the summer and 6 am to 10 am in the winter)?

- (d) Provide the analysis Mr. Alvarez relies upon to conclude that the climate in Kentucky is similar to the climate in Maryland? ... in the BG&E service area?
- (e) Does Mr. Alvarez and the Kentucky Attorney General believe that a Duke Energy Kentucky DSM PTR Pilot program should provide load reduction incentives equal to 100% of all avoided costs the program provides?

RESPONSE:

32. On page 18 of his testimony, Mr. Alvarez states that the 'marginal' price for energy at Duke Energy three local pricing nodes reached \$360 per MWh at 5:00 p.m. on July 1, 2019. On page 24 of his testimony, Mr. Alvarez acknowledges that Duke Energy Kentucky proposes to call 16-25 critical peak events per year as part of its proposal. For calendar years 2017, 2018, and 2019, please provide the 25 highest 4-hour average locational marginal prices consistent with the proposed PTR Pilot program event window at the three local pricing nodes referenced by Mr. Alvarez.

RESPONSE:

33. Please confirm that the Baltimore Gas & Electric Company is not a Fixed Resource Requirement (FRR) entity in PJM.

RESPONSE:

34. Provide the last 5 years of PJM capacity market (RPM) clearing prices for the Baltimore Gas & Electric service area (Local Delivery Area [LDA]) in Maryland for the PJM Base Residual Auction, 1st incremental, 2nd incremental, and 3rd incremental auctions.

RESPONSE:

35. Is the Baltimore Gas & Electric PTR program subject to the same cost-effectiveness DSM test score criteria as Duke Energy Kentucky's DSM programs? If not, explain what criteria is used to evaluate the Baltimore Gas & Electric PTR program?

RESPONSE:

36. Regarding Mr. Alvarez's proposal to use Maryland as a model for the PTR pilot program, is Mr. Alvarez aware of any other states that:

(a) Have fully integrated electric utilities (non-retail choice) with smart meter technology that have PTR programs? If so, please list the states and a brief summary of the details of the program, such as whether the program is a pilot or available to all customers and the pricing terms of the PTR program.

(1) If available to all customers, is the program default or voluntary?

(b) Have fully integrated retail jurisdictional electric utilities with smart meter technology that do NOT have PTR programs?

RESPONSE:

37. Is Mr. Alvarez and/or the Kentucky Attorney General familiar with:
- (a) the PJM capacity resource requirements currently in effect?
 - (b) the PJM capacity resource requirements that will be in effect for the 2020/2021 delivery year?
 - (c) If the response to a or b above is in the affirmative, please explain these requirements as they pertain to summer and winter load reduction availability?

RESPONSE:

38. Does Mr. Alvarez and/or the KY AG believe that a Duke Energy Kentucky PTR DSM program can provide capacity value to Duke Energy Kentucky's FRR plan without meeting PJM Price Responsive Demand (PRD) requirements?

- (a) If so, please explain how this can happen.
- (b) Please describe the capacity value provided by a Duke Energy Kentucky PTR DSM program that does not satisfy PJM PRD requirements?
- (c) Please explain how a PTR DSM program that does not satisfy PJM PRD requirements should be valued in relation to a DSM program that does satisfy the PJM PRD requirements?

RESPONSE:

39. Does Mr. Alvarez believe the Duke Energy Kentucky PTR Pilot program should serve as a research study for all investor owned utilities (IOUs) in Kentucky? If so, does Mr. Alvarez believe the results of such a study are transferrable to other IOU areas? Does Mr. Alvarez believe that the customers of Duke Energy Kentucky should solely pay the cost of a study for other IOU service areas?

RESPONSE:

40. Please provide any studies, calculations, or workpapers developed by Mr. Alvarez to quantify the impact on Duke Energy Kentucky's residential electric customers assuming a \$1,250 per MWh price is established for the peak time rebate if (1) the Pilot program is limited to the 1,000 customers, as agreed to by the Attorney General in the Stipulation approved in Case No. 2016-00152 or (2) the program is available to all residential customers as proposed by Mr. Alvarez.

RESPONSE:

41. Does Mr. Alvarez agree that the cost of providing the peak time rebate credit, whether at the \$330 per MWh rate proposed by the Company or at the \$1,250 per MWh rate proposed in his testimony, should be recovered from customers?

RESPONSE:

42. Does the Kentucky Attorney General and/or Mr. Alvarez agree that a 1,000 participant opt-in PTR pilot, as proposed by Duke Energy Kentucky and agreed to in the Settlement approved in Case No. 2016-00152, is likely a sufficient sample size to estimate the load reduction amount provided by participants during summer and winter PTR pricing events under the Duke Energy Kentucky DSM program accuracy requirements?

(a) If the response is in the negative, please explain why.

RESPONSE:

43. Referring to Alvarez testimony page 11, lines 11 & 12 “Duke is motivated by capital bias to build...” Please provide all supporting documents for this statement.

RESPONSE:

44. Referring to Alvarez’s concern with the sample size proposed in the Duke Energy Kentucky PTR Pilot and his testimony on page 8, lines 18 - 20 “I consider the approach employed in Maryland to be a best practice for utilities which have installed smart meters.”

- (a) Please provide the sample size used by Baltimore Gas & Electric and PEPCO in their PTR pilots.
- (b) Please provide the Baltimore Gas & Electric and Pepco PTR pilot participation levels by year for their respective pilots.
- (c) Please provide the percentage of the Baltimore Gas & Electric and Pepco total sample size that the program impacts were based upon (in other words, did most of the pilot program’s impact come from only the top half of the pilot’s participants?)

- (d) Please provide documentation, studies, analysis or summaries of any and all lessons learned as a result of the Baltimore Gas & Electric and Pepco PTR Pilots, including but not limited to, assessments of rebate amounts, sample size, customer participation levels, customer marketing, notification methods & times, etc.

RESPONSE:

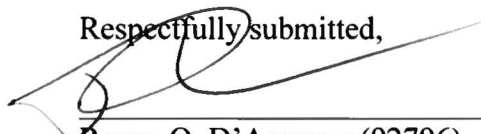
45. Referring to Alvarez's concern regarding Duke Energy Kentucky's proposed \$.33/kwh rebate, please provide any and all analyses, and supporting documentation that this rebate amount will "reduce customer's motivation to reduce usage during CPE's and likely result in lower observed impacts in the Pilot" (Alvarez testimony page 18).

RESPONSE:

46. Regarding Alvarez's suggestion of an eventual default standard PTR program, please provide any and all cost benefit analyses performed to demonstrate the value associated with making this a standard rebate program for all Duke Energy Kentucky's residential customers.

RESPONSE:

Respectfully submitted,



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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 December 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 delivered via second day delivery to the Commission on the 20th day of December 2019.



Rocco D'Ascenzo

Rebecca W. Goodman
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