

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF DUKE ENERGY )  
KENTUCKY, INC. TO AMEND ITS DEMAND SIDE ) CASE NO.  
MANAGEMENT PROGRAMS ) 2019-00277

**ATTORNEY GENERAL'S SUPPLEMENTAL DATA REQUESTS TO DUKE  
ENERGY KENTUCKY, INC.**

Comes now the intervenor, the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention ("Attorney General"), and submits these Supplemental Data Requests to Duke Energy Kentucky, Inc. (hereinafter "DEK", "Duke", or the "Company") to be answered by November 22, 2019, and in accord with the following:

- (1) In each case where a request seeks data provided in response to a staff request, reference to the appropriate requested 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.
- (4) These requests shall be deemed continuing so as to require further and supplemental responses if the companies 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, please request clarification directly from undersigned 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, please identify each variable contained in the printout which would not be self-evident to a person not familiar with the printout.

(9) If the companies have 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, and in accordance with Commission direction.

(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 companies, please 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 the foregoing is a true and accurate copy of the same document being filed in paper medium with the Commission within two business days; that the electronic filing has been transmitted to the Commission on November 8, 2019; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding.

This 8th day of November, 2019.



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Assistant Attorney General

The Application of Duke Energy Kentucky, Inc. to Amend  
its Demand Side Management Programs  
Case No. 2019-00277  
Attorney General's Supplemental Data Requests

1. Refer to DEK's response to AG DR 1-2, and the Attachment, p. 1 of 12, wherein it is stated that customers may also receive a "campaign offer" through direct mail or e-mail with a unique URL directing them to the program page.
  - a. Explain the purpose of the unique URL provided in a direct mail campaign, and whether specialized offers are made based upon a customer's buying habits.
  - b. Explain the source(s) for the Company's knowledge regarding an individual customer's buying habits.
2. Refer to DEK's response to AG DR 1-3. Describe what is meant by the term, "A-Line bulbs."
  - a. Provide a description of the efficiency changes that EISA mandates with regard to "A-Line" bulbs.
  - b. Explain whether any other types of bulbs incorporating the EISA standards could be cost effective.
  - c. Provide the thresholds upon which Duke is relying in basing its determination that post-EISA bulbs will no longer be cost-effective.
3. Refer to the Application generally. How will DEK ensure that the PTR Pilot has broad-enough participation in order to guarantee the data represents an accurate cross-section of DEK's residential customers, including low-income customers, low-use customers, high-use customers, etc.?
4. Refer to DEK's response to AG DR 1-9 (b). Explain what characteristics a system-wide PTR program would need to be includable in the Company's FRR plan in the way DEK's PowerShare® and PowerManager® programs are.
5. Refer to DEK's Response to AG DR 1-6(b), wherein the response states that a certain methodology was chosen, "As a result of the discussion with the Kentucky Collaborative." Reconcile this response with DEK's response to AG DR 1-1, wherein it states "Feedback was not received by any collaborative member concerning any changes to be filed as part of the amendment filing."

The Application of Duke Energy Kentucky, Inc. to Amend  
its Demand Side Management Programs  
Case No. 2019-00277  
Attorney General's Supplemental Data Requests

6. Refer to the initial request and DEK's response to AG DR 1-6(e). Explain how demand and energy reductions from demand response and DSM programs, generally, affect DEK's load obligation used in DEK's FRR plan. Based on DEK's response to the request, above, explain what other relevant objectives or questions should be assessed through the PTR pilot.
  
7. Refer to DEK's response to AG DR 1-8(b). Confirm that the Stipulation in Case No. 2016-00152 notes that the EM&V report will discuss the listed questions, "among other things."
  - a. Given that the six (6) questions are the minimum items that the EM&V report will discuss pursuant to the Stipulation in Case No. 2016-00152, identify the other questions DEK intends for the PTR Pilot to answer.
  
8. Refer to the response to AG DR 1-9(b), wherein the response states that although the "PTR Pilot program will not meet PJM capacity requirements," that "some regional entities, such as PJM, require very short implementation lead times for demand response programs to qualify as a capacity resource." Further reference is made to DEK's response to AG DR 1-14 wherein DEK stated, "The PTR programs in other jurisdictions within the PJM footprint were studied to a small degree." Finally, further reference is made to Case No. 2017-00427, and specifically, DEK's March 2, 2018 Petition for Rehearing.
  - a. Does DEK agree that the capacity benefits derived from its DSM suite help it meet its PJM capacity obligations as a FRR entity?
  - b. Does DEK agree that reductions to its forecasted load or increases in its available capacity are a benefit to itself and its customers?
  - c. Explain the questions that DEK seeks to answer as part of the PTR Pilot related to the possibility of receiving value from system-wide PTR as it relates to PJM, and specifically DEK's FRR designation.

The Application of Duke Energy Kentucky, Inc. to Amend  
its Demand Side Management Programs  
Case No. 2019-00277  
Attorney General’s Supplemental Data Requests

9. Refer to Table 2 from DEK’s March 2, 2018 Petition for Rehearing filed in Case No. 2017-00427, recreated below. Provide an update to this table with information for any planning years subsequent to the creation of the original table.

**TABLE 2:<sup>19</sup>**

<b>DEK Final FRR Position</b>									
Planning Year	EFORD		Total UCAP MW		PJM Load Obligation	FRR Position		Excess Based on Load	
	East Bend	Woodsdale	Gen	DR		w/ DR	w/o DR	w/ DR	w/o DR
2011/2012	4.4%	10.0%	947.6	42.3	(930.5)	59.4	17.1	6.4%	1.8%
2012/2013	5.4%	5.1%	980.6	42.4	(925.0)	98.0	55.6	10.6%	6.0%
2013/2014	7.7%	12.4%	908.1	35.4	(943.3)	40.2	4.8	4.3%	0.5%
2014/2015	14.8%	5.7%	921.8	27	(972.4)	30.4	3.4	3.1%	0.3%
2015/2016	15.6%	7.9%	931.7	36.2	(955.5)	15.8	(20.4)	1.7%	-2.1%
2016/2017	3.5%	3.8%	1023.7	28.7	(918.7)	133.7	105.0	14.6%	11.4%
2017/2018	9.8%	3.2%	988.4	27	(970.5)	11.9	(15.1)	1.2%	-1.6%
2018/2019	7.2%	9.4%	975.6	15	(969.5)	21.1	6.1	2.2%	0.6%
2019/2020	9.9%	7.9%	966.4	16.3	(944.4)	38.3	22.0	4.1%	2.3%
2020/2021	9.9%	7.9%	966.4	10.9	(974.7)	2.6	(8.3)	0.3%	-0.9%

10. Refer to DEK’s response to AG DR 1-13. Explain how DEK calculated the avoided costs, including the time period initially calculated, when it was calculated and any calculation or escalation used for subsequent years. Further explain how long DEK has used the avoided cost explained above, and if the calculation has changed in the past three (3) years, explain why a change was made and what the previous calculation was.
11. Refer to DEK’s response to AG DR 1-10 and Staff DR 1-6(a), including its corresponding attachments. Further refer to tab “Top Events.”
- a. Explain the rationale for choosing 100 days to determine the data set.
  - b. Explain the rationale for choosing a dollar threshold of \$70 to narrow the data set.
  - c. Explain why a top 16-25 of events was not used to narrow the data set.
  - d. Explain why the averages in cells J115 & J116 do not include data from 2018.
  - e. Explain the derivation and calculation of the Capacity Value of 65.1. Compare this capacity value to the avoided capacity value of \$70.10 for 2019 provided in AG DR 1-13. Explain the inconsistency between the two values and why the





The Application of Duke Energy Kentucky, Inc. to Amend  
its Demand Side Management Programs  
Case No. 2019-00277  
Attorney General's Supplemental Data Requests

- c. Fully explain how DEK will evaluate [REDACTED]  
[REDACTED]  
[REDACTED].
14. Reference the response to AG DR 1-7, Confidential Attachment 2, p. 10 of 15, in the paragraph with the heading, "[REDACTED]." Explain whether [REDACTED]  
[REDACTED]. If not, why not?
15. Explain whether DEK will follow all other Nexant [REDACTED]  
[REDACTED]. If not, explain fully why not.