

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 6th day of February, 2020.


NOTARY PUBLIC

My Commission Expires: July 8, 2022

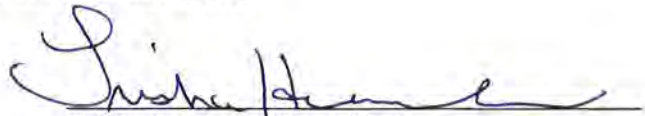


E. MINNA ROLFES-ADKINS
Notary Public, State of Ohio
My Commission Expires
July 8, 2022


VERIFICATION

STATE OF OHIO)
) **SS:**
COUNTY OF HAMILTON)

The undersigned, Trisha Haemmerle, Senior Strategy & Collaboration Manager, 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.


Trisha Haemmerle, Affiant

Subscribed and sworn to before me by Trisha Haemmerle on this 13th day of February, 2020.


NOTARY PUBLIC

My Commission Expires: July 8, 2022

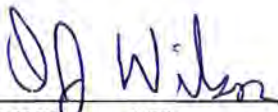


E. MINNA ROLFES-ADKINS
Notary Public, State of Ohio
My Commission Expires
July 8, 2022

VERIFICATION

STATE OF OHIO)
) SS:
COUNTY OF HAMILTON)

The undersigned, OJ Wilson, Associate Revenue Analyst, being duly sworn, deposes and says that he 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 his knowledge, information, and belief.



OJ Wilson, Affiant

Subscribed and sworn to before me by OJ Wilson on this 13th day of February, 2020.



NOTARY PUBLIC

My Commission Expires: July 8, 2022



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

KyPSC Case No. 2019-00366
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STAFF-DR-03-001

REQUEST:

Refer to Community Action of Kentucky, Inc.'s (CAK) response to Staff's First Request for Information, Attachment A, which contains CAK's recommendations for revisions to HEA programs. If the Commission were to implement each recommendation, explain how implementing the recommendation would impact your utility, addressing in detail any perceived benefits, adverse consequences, or impediments to implementing the recommendations.

RESPONSE:

Duke Energy Kentucky's responses to each recommendation in Attachment A are outlined below:

a. Drop the Weatherization ("WX") application requirement.

Duke Energy Kentucky does not require this.

b. Drop the budget plan enrollment requirement.

Duke Energy Kentucky does not require this.

c. Implement *consistent* eligibility requirements.

Duke Energy Kentucky does not object to defining "hardship" as recommended by CAK. However, the Company believes that for the crisis-based programs, flexibility should be available in the program administration to address need. The Company's current HEA program does not have a fixed monthly benefit. Benefits

are determined by need up to \$300. Limiting the benefit to follow the LIHEAP guidelines would be a detriment to our customers, as the Company reaches more customers in need by making our program available to those up to 150% of the federal poverty level. If the Commission migrates HEA programs to a subsidy based program, then a standard fixed monthly benefit would be appropriate.

d. Consistent benefits.

Utility rates and rate structures are not identical throughout Kentucky. There should be flexibility to establish benefits based upon the unique circumstances of each utility and its customer base. That said, the Company could implement a consistent benefit amount if that is what the Commission determines. Duke Energy Kentucky does not differentiate the HEA program funds by service type (electric or natural gas), rather, the Company has a consistent method of distributing funds by account.

e. Drop the requirement to direct the LIHEAP payments to the utility.

This would likely create an issue with the federally funded LIHEAP structure. Not having funds go directly to the utility opens the door to potential waste, fraud and abuse. Duke Energy Kentucky does not recommend this proposal be adopted.

f. Drop the requirement to apply for LIHEAP.

Duke Energy Kentucky does not require a customer to apply for LIHEAP to receive HEA funds. Duke Energy Kentucky's HEA eligibility (at or below 150% of FPL) is greater than that of LIHEAP (at or below 130% of FPL) allowing us to assist more customers through HEA dollars. However, the Company does require income eligible customers (at or below 130% FPL) to use LIHEAP funding first, *if available*, and then WinterCare funds, before HEA funds are awarded. LIHEAP

funding availability is not a prerequisite for receiving WinterCare or HEA benefits. The prioritization used by Duke Energy Kentucky is simply to make sure funding is available to the largest number of customers.

g. Administrative recommendations.

- **Streamlined consistent deliverables.**

Duke Energy Kentucky does not object to making reasonable data and reporting periods consistent across all programs to the extent the Commission accepts them.

- **Create and use standardized contract templates.**

Duke Energy Kentucky objects to standardizing contracts. Each utility should have the autonomy to negotiate its own contracts and required language.

- **Include legal fees.**

This conflicts with the objective of achieving a standardized fee for the administrative organization. Duke Energy Kentucky disagrees with the notion that agencies could increase their costs of administering the program by charging legal fees. This will increase costs of the program and reduce benefits to customers. To the extent the Commission allows this, however, such costs must be recoverable. In Duke Energy Kentucky's opinion, these costs should be included in the reasonable administrative fee associated with the HEA program.

- **Standardize Invoices and Invoicing procedures.**

Duke Energy Kentucky does not object to standardizing invoices and invoicing procedures to the extent the Commission accepts them. To the extent the Commission allows this, such costs must be recoverable. In Duke Energy Kentucky's opinion, these costs should be included in the reasonable administrative fee associated with the HEA program.

- **Fees paid to organizations for processing applications.**

Duke Energy Kentucky does not object to making fees paid to organizations for processing applications consistent when the burden and work is equal, to the extent the Commission accepts this proposal. To the extent the Commission allows this, such costs must be recoverable. In Duke Energy Kentucky's opinion, these costs should be included in the reasonable administrative fee associated with the HEA program.

- **Implement a mechanism to pay for ongoing maintenance of IT and computer systems.**

Utility HEA programs should not subsidize IT and computer upgrades that benefit other non-HEA programs. Moreover, increasing costs of the program reduces benefits to customers. To the extent the Commission allows this, such costs must be recoverable. In Duke Energy Kentucky's opinion, these costs should be included in the reasonable administrative fee associated with the HEA program.

- **Implement a mechanism to pay for support of the system.**

Utility HEA programs should not subsidize CAK beyond the payments contemplated as a reasonable administrative charge. Moreover, increasing administrative costs of the program reduces benefits to customers. To the extent the Commission allows this, such costs must be recoverable. In Duke Energy Kentucky's opinion, these costs should be included in the reasonable administrative fee associated with the HEA program.

PERSON RESPONSIBLE: Cindy Givens

STAFF-DR-03-002

REQUEST:

Identify any other bill payment assistance programs, other than those listed on the attached spreadsheet, that your utility funds either through customer donations or shareholder funds. Describe all funding sources for the program(s); state whether the program is a crisis program or recurring benefit program; provide the eligibility criteria; and state whether any fees are paid to administer the program(s).

RESPONSE:

WinterCare

The WinterCare program is a Duke Energy sponsored crisis program to provide heating or cooling bill assistance for Duke Energy Kentucky income eligible customers who are experiencing a crisis as a result of a past due bill, disconnection notice, or disconnection for non-payment. WinterCare was established in 1984 to assist Kentucky residents in need with winter heating bills and is funded by our customers, employees and shareholders. Duke Energy Kentucky contributes \$25,000 and will match dollar-for-dollar up to \$25,000 in customer contributions annually.

Customers at or below 150% FPL may apply for up to \$300 in assistance throughout the year as long as funds are available. Customers may also qualify for additional assistance through our Home Energy Assistance program administered under the WinterCare program. Eligibility will be determined at time of application

by the Northern Kentucky Community Action Commission (NKCAC). NKCAC retains 5% of the total program funding for administrative fees.

Payment Plus

The Payment Plus portion of the Low-Income Services program is designed to impact participants' behavior (*e.g.*, encourages utility bill payment and reducing arrearages) and to generate energy conservation impacts. This program specifically focuses on LIHEAP customers that meet the income qualification level (*i.e.*, income below 200% of the federal poverty level). This program uses the LIHEAP intake process as well as other community outreach initiatives to increase participation.

In 2018, the Low-Income Program was amended to remove the criteria that a customer must be both in arrears and participate in the LIHEAP program to be eligible to participate in the Payment Plus Program, thereby increasing the participation rate for low-income customers.

The program is made up of three components: (1) Energy Education & Budget Counseling; (2) Weatherization; and (3) Bill Assistance. Payment assistance credits are provided to each customer once they complete each aspect of the program. The credits are: \$200 for participating in energy counseling, \$150 for participating in the budgeting counseling, and \$150 for participating in the weatherization services. If all the requirements are completed, a household could receive up to a total of \$500 towards their arrearage.

This allows for approximately 200 homes to participate per year. Some customers do not complete all three steps or may have already had weatherization services completed prior to the program. This program is offered twice over six winter months per year

(October-March). The costs of the program are recovered through the Company's Rider DSMR (Demand Side Management Rate).

PERSON RESPONSIBLE: Cindy Givens (WinterCare)
Trisha Haemmerle (Payment Plus)

**Duke Energy Kentucky
Case No. 2019-00366
Staff Third Set Data Requests
Date Received: January 31, 2020**

STAFF-DR-03-003

REQUEST:

Refer to Duke Kentucky's response to the Attorney General's First Request for Information, Item 3. Explain in detail Duke Kentucky's participation with the WinterCare program, and what the program is.

RESPONSE:

The WinterCare program is a Duke Energy sponsored program to provide heating or cooling bill assistance for Duke Energy Kentucky income eligible customers who are experiencing a crisis as a result of a past due bill, disconnection notice, or disconnection for non-payment. WinterCare was established in 1984 to assist Kentucky residents in need with winter heating bills and is funded by our customers, employees and shareholders. Duke Energy Kentucky contributes \$25,000 and will match dollar-for-dollar up to \$25,000 in customer contributions annually.

Customers may apply for up to \$300 in assistance throughout the year as long as funds are available. Customers may also qualify for additional assistance through our Home Energy Assistance program administered under the WinterCare program. Eligibility will be determined at time of application by the Northern Kentucky Community Action Commission (NKCAC).

When Duke Energy Kentucky's call center representatives receive a call from customers requesting payment assistance for a past due bill or a pending disconnection,

they provide the customer with the options available to bring the account current and/or avoid disconnection. The representative will notify the customer of the WinterCare and HEA programs, including the income guidelines, and provide the customer with the contact information for NKCAC to schedule an appointment or get more information.

PERSON RESPONSIBLE: Cindy Givens

**Duke Energy Kentucky
Case No. 2019-00366
Staff Third Set Data Requests
Date Received: January 31, 2020**

STAFF-DR-03-004

REQUEST:

Explain whether HEA benefits are prioritized or provided before or after other available benefits, such as LIHEAP, donations, or other programs aimed at reducing consumers' energy burdens.

RESPONSE:

To the extent qualifying customers at or below 150 percent of the federal poverty level have other assistance available at the time of need, e.g. Low Income Home Energy Assistance Program ("LIHEAP") or WinterCare, HEA, program funds would not be expended for those customers. HEA funds are available for income qualifying customers once other low-income program funds have been depleted.

PERSON RESPONSIBLE: Cindy Givens

Duke Energy Kentucky
Case No. 2019-00366
Staff Third Set Data Requests
Date Received: January 31, 2020

STAFF-DR-03-005

REQUEST:

Refer to Duke Kentucky's response to the Attorney General's First Request for Information, Item 4.

- a. Provide representative bill inserts, emails, website landing pages and banners used by Duke Kentucky since January 1, 2019, for purposes of notifying customers of the availability of the WinterCare Program.
- b. Explain why Duke Kentucky's HEA program is administered under, and is part of, the WinterCare program.
- c. Provide the material relevant to HEA that were "included as part of the call center's winter refresher training."

RESPONSE:

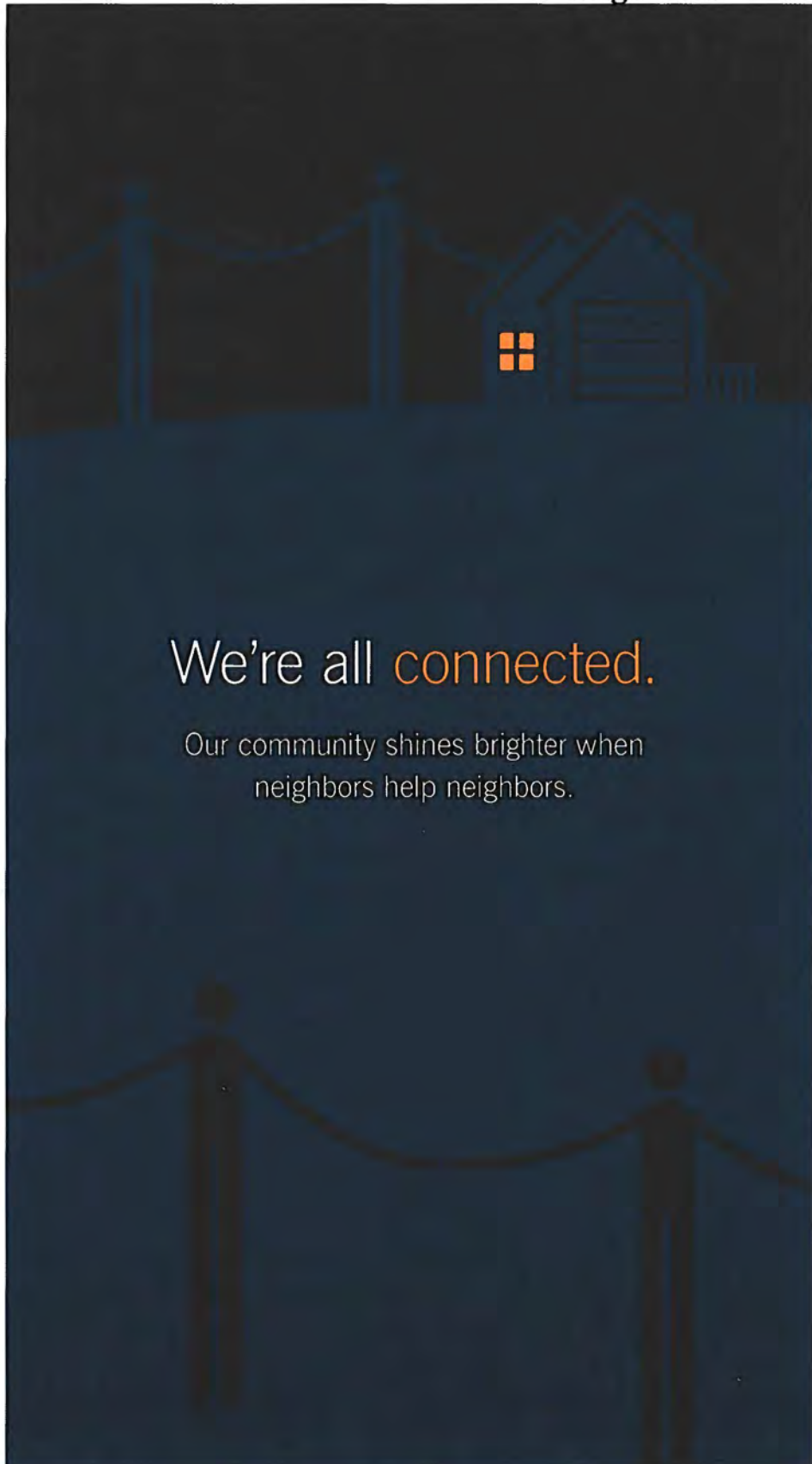
- a. Please see STAFF-DR-03-005(a) Attachment.
- b. Duke Energy Kentucky first sought approval of the HEA program in Case No. 2005-00402.¹ At that time, the HEA program was designed to be administered under the umbrella of its WinterCare program. The structure was vetted with our DSM collaborative and approved by the Commission. The records for the creation of the HEA program are no longer available. It was likely administered under

¹ *In the Matter of the Annual Cost Recovery Filing for Demand Side Management by the Union, Light, Heat and Power Company*, Case No. 2005-00402, Amended Application (November 21, 2005).

WinterCare as the Company personnel that managed the WinterCare program would also administer the HEA and it created efficiencies.

c. Please see STAFF-DR-03-005(c) Attachment.

PERSON RESPONSIBLE: Cindy Givens



We're all **connected.**

Our community shines brighter when
neighbors help neighbors.

When we all chip in,
we create **one powerful**
chain of support.

Duke Energy is proud to work hand in hand with our customers, employees and communities to provide heating assistance to our neighbors in need.

A gift to the WinterCare program (even just \$1) helps improve the lives of seniors and families who struggle to pay their heating bills. Plus, **Duke Energy will match every dollar donated (up to \$25,000) to help ensure none of our neighbors worry about staying warm this winter.**

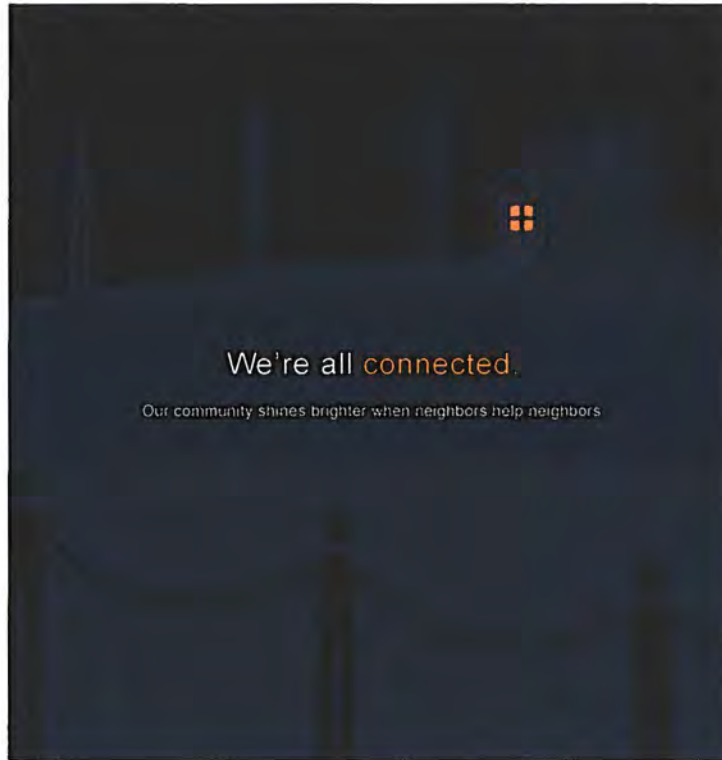
If you need help, contact the Northern Kentucky Community Action Commission at **859.581.6607** for more on our WinterCare and Home Energy Assistance programs.

To contribute to WinterCare, mark the special box on your monthly bill, note a donation amount and add the amount to your bill payment. Paperless billing customers may donate when paying their bills online.

For more information, visit
duke-energy.com/WinterCare.



BUILDING A SMARTER ENERGY FUTURE®



When we all chip in, we create one powerful chain of support.

Duke Energy is proud to work hand in hand with our customers, employees and communities to help provide heating assistance to our Kentucky neighbors in need

A gift to the WinterCare program (even just \$1) helps improve the lives of seniors and families who struggle to pay their heating bills. Plus, Duke Energy will match every dollar donated (up to \$25,000) to help ensure none of our neighbors have to worry about staying warm this winter

HELP NOW

Customers in need of heating assistance should contact the Northern Kentucky Community Action Commission at [859.581.6607](tel:859.581.6607) for more on our WinterCare and Home Energy Assistance programs.

This program is administered by the Northern Kentucky Community Action Commission.

BUILDING A SMARTER ENERGY FUTURE™

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Duke Energy | 550 South Tryon Street | Charlotte, NC 28202

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Wintercare

Helping people in need with winter heating bills.

WATCH VIDEO

You have the power to help

WinterCare was established in 1984 to assist Kentucky residents in need with winter heating bills and is funded by our customers, employees and shareholders. Duke Energy contributes \$25,000 and will match dollar-for-dollar up to \$25,000 in customer contributions annually.

How to apply for assistance

Customers may apply for up to \$300 in assistance throughout the year as long as funds are available. Customers may also qualify for additional assistance through our Home Energy Assistance program administered under the WinterCare program. Eligibility will be determined at time of application by the Northern Kentucky Community Action Commission.

To apply or for additional information, please contact the Northern Kentucky Community Action Commission at [629.581.6507](tel:629.581.6507).

How to make a donation

If you would like to share the warmth with those less fortunate in your community, contributions can be made in two ways:

- You may add a donation to your monthly Duke Energy bill. (Most monthly bills have a special notation in the upper right-hand corner to mark your WinterCare donation.)
 - Write in the dollar amount you would like to give (in even dollar amounts).
 - Add the amount to your bill payment.
- You also may mail donations by check or money order only. Checks should be made payable to The Northern Kentucky Community Action Commission/WinterCare Program.

Please mail donations to:

Duke Energy WinterCare Program
 139 E. Fourth St.
 Cincinnati, OH 45202

Paperless Billing Donations

Our Paperless Billing customers can easily make a donation online when scheduling their monthly Duke Energy payment. Just complete the section titled "Customer Contribution" if you would like to make a donation to WinterCare.

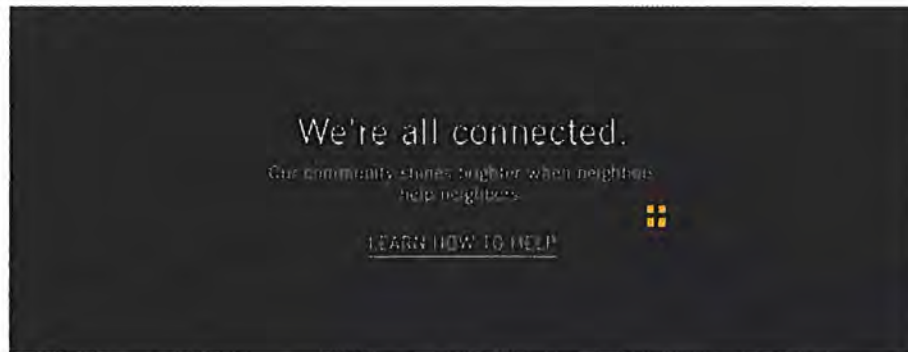
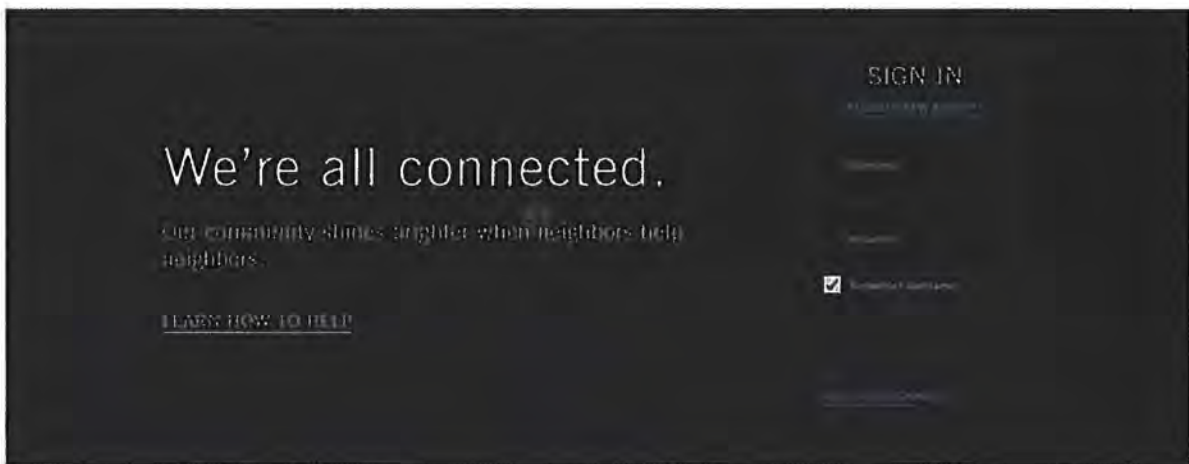
Mail donations to:

Duke Energy WinterCare Program
 139 E. Fourth St.
 Cincinnati, OH 45202

Contact us

[800.544.6900](tel:800.544.6900)





DEK - WinterCare

Description:

WinterCare is a Duke Energy Kentucky sponsored program designed to provide heating assistance to those in need.

WinterCare is administered in partnership with the Northern Kentucky Community Action Commission (NKCAC).

Continuing a 34-year tradition, Duke Energy, customers and shareholders will provide the funds that are distributed by the Northern Kentucky Community Action Commission to assist customers struggling to pay their winter energy bills. Duke Energy contributes \$25,000 and will match \$1 for \$1 up to an additional \$25,000 in customer and employee donations each year for our WinterCare program.

Employees and customers may donate on their bill by marking the donation section, mailing a check or money order or paperless billing customers may donate on-line when paying their monthly bill.

Work Process:

Eligibility Requirements

- Applicants must be responsible for home energy costs (bill in their name or spouse's name)
- Applicants must be active Duke Energy Customers who have Duke Energy electric or natural gas as their primary heat source
- Eligibility and the distribution of funds are determined by the Northern Kentucky Community Action Commission (NKCAC) on a case-by-case basis
- Eligible customers can receive assistance of up to \$300 per program year, as long as funds are available

To apply for assistance

The Northern Kentucky Community Action Commission manages the program using federal low-income guidelines of at or below 150% of the Federal Poverty Level, as well as true need, to determine eligibility.

Eligible customers may receive up to \$300 during the year as long as funds are available. Customers should contact the Northern Kentucky Community Action Commission at 859.845.0081 or online at nkcac.cascheduler.com for more information.

Northern Kentucky Community Action Commission locations and staff contacts:

*Boone County Neighborhood Center
6555 Nicolas St, Suite A2
Florence KY 41042
859.586.9250
Teresa Finke*

*Campbell County Neighborhood Center
437 West 9th Street
Newport KY 41071
859.431.4177
Megan Bradford*

*Carroll County Neighborhood Center
1302 Highland Ave
Carrollton KY 41008
502.732.5253*

Sarah Crawford

*Gallatin County Neighborhood Center
100 Davis Ave Suite 1&2
Warsaw KY 41095
859.567.7644
Amanda Garrett*

*Grant County Neighborhood Center
1116 North Main Street
Williamstown, KY 41097
859.824.4768
Ashley Domaschko*

*Kenton County Neighborhood Center
1561 Madison Ave
Covington KY 41011
859.655.2959
Sally Smith*

*Owen County Neighborhood Center
109 South Madison
Owenton KY 40359
502.484.2116
Lauren Keith*

*Pendleton County Neighborhood Center
311 Park Street
Falmouth KY 41040
859.654.4054
Myriah Arnold*

Required Documents

- Proof of income for previous month for all adults in the home
- Current electric or gas bill in head of household or spouse's name

Additional Program: HEA

- HEA is a separate Duke Energy Kentucky program designed to provide bill assistance administered in partnership with Northern Kentucky Community Action Commission under the WinterCare program
- Eligibility is determined by NKCAC when customers are applying for WinterCare assistance

Donations from customers or the public:

Customers may add a donation to their monthly Duke Energy bill. Monthly bills have a special notation in the upper right-hand corner for WinterCare donations. Customers may write in the dollar amount they would like to give (in even dollar amounts) and add the amount to their bill payment.

Donations may be mailed (check or money order only) to the Program Manager. Checks should be made payable to The Northern Kentucky Community Action Commission/WinterCare Program and mailed to:

WinterCare Program

139 E 4th Street

Cincinnati, OH 45202

Paperless Billing customers donations

Paperless Billing customers can make a donation online while scheduling their monthly Duke Energy payment. Customers will need to complete the section titled 'Customer Contribution' if they would like to make a donate to WinterCare.

All donations are forwarded to the Northern Kentucky Community Action Commission for distribution to those in need.

REQUEST:

For each HEA program, provide the following information for each of the last five full program years:

- a. The average monthly bill for all residential customers for each month from November to March.
- b. The average monthly bill for residential customers receiving HEA benefits for each month from November to March.
- c. The average monthly bill for residential customers receiving LIHEAP benefits for each month from November to March.

RESPONSE:

- a. Please see STAFF-DR-03-006(a) Attachment.
- b. Duke Energy Kentucky's billing system only keeps the HEA data readily accessible for two years. Prior years' data is archived and is not readily accessible.

Average Monthly Charges For Customers Who Received HEA Funding (G+E)		
Month	2018	2019
Jan	\$221.39	\$217.04
Feb	\$173.66	\$206.19
Mar	\$138.92	\$164.13
Nov	\$118.76	\$103.85
Dec	\$168.50	\$162.70

- c. Duke Energy Kentucky's billing system only keeps this LIHEAP data readily accessible for two years. Prior years' data is archived and is not readily accessible.

Average Monthly Charges For Customers Who Received LIHEAP Funding (G+E)		
Month	2018	2019
Jan	\$244.58	\$201.74
Feb	\$195.92	\$250.73
Mar	\$151.81	\$213.95
Nov	\$123.27	\$99.86
Dec	\$186.76	\$156.79

PERSON RESPONSIBLE: Cindy Givens

**DUKE ENERGY KENTUCKY
 AVERAGE RESIDENTIAL REVENUE PER BILL
 SOURCE: DUKE ENERGY RAC REPORTS**

**Company DEK
 Service Electric
 Classification 00-Residential**

**Company DEK
 Service Gas
 Classification 00-Residential**

<u>Period</u>	<u>Sum of Average Bill</u>
11/1/2014	\$67.72
12/1/2014	\$98.52
1/1/2015	\$109.19
2/1/2015	\$103.59
3/1/2015	\$99.91
11/1/2015	\$57.28
12/1/2015	\$79.26
1/1/2016	\$95.79
2/1/2016	\$97.64
3/1/2016	\$78.89
11/1/2016	\$62.16
12/1/2016	\$86.00
1/1/2017	\$102.71
2/1/2017	\$81.13
3/1/2017	\$72.36
11/1/2017	\$67.96
12/1/2017	\$84.19
1/1/2018	\$126.40
2/1/2018	\$92.36
3/1/2018	\$76.33
11/1/2018	\$76.67
12/1/2018	\$99.06
1/1/2019	\$111.48
2/1/2019	\$108.51
3/1/2019	\$89.69
11/1/2019	\$67.97
12/1/2019	\$99.20

<u>Period</u>	<u>Sum of Average Bill</u>
11/1/2014	\$65.35
12/1/2014	\$130.27
1/1/2015	\$152.76
2/1/2015	\$143.38
3/1/2015	\$139.85
11/1/2015	\$44.19
12/1/2015	\$72.38
1/1/2016	\$106.91
2/1/2016	\$117.77
3/1/2016	\$80.66
11/1/2016	\$40.06
12/1/2016	\$93.33
1/1/2017	\$132.94
2/1/2017	\$97.69
3/1/2017	\$85.92
11/1/2017	\$51.61
12/1/2017	\$90.95
1/1/2018	\$142.69
2/1/2018	\$112.27
3/1/2018	\$81.06
11/1/2018	\$58.06
12/1/2018	\$108.60
1/1/2019	\$128.71
2/1/2019	\$118.63
3/1/2019	\$98.41
11/1/2019	\$51.92
12/1/2019	\$95.44

Duke Energy Kentucky
Case No. 2019-00366
Staff Third Set Data Requests
Date Received: January 31, 2020

STAFF-DR-03-007

REQUEST:

Refer to Appendix C of the Commission’s Order in Case No. 2019-00366 dated October 28, 2019. For the period of January 1, 2015, until December 31, 2019, provide (monthly and annually) the following information:

- a. Total service termination notices issued.
- b. Total service terminations.
- c. Total amount of unique customers issued service termination notices.
- d. Total amount of unique customers with service terminated.

RESPONSE:

a.

Kentucky Residential Service Termination Notices Issued					
	2015	2016	2017	2018	2019
Jan	11,954	8,531	8,624	10,154	11,072
Feb	13,567	10,946	12,116	11,437	12,183
Mar	14,122	13,279	12,764	13,063	12,702
Apr	14,175	12,426	10,076	10,439	13,437
May	12,965	10,970	11,929	12,523	12,621
Jun	9,394	9,360	7,305	9,169	8,128
Jul	9,511	7,864	7,227	9,563	9,201
Aug	10,742	11,826	10,572	12,567	10,583
Sep	10,946	11,573	10,420	10,108	10,325
Oct	11,583	11,515	10,605	12,208	11,522
Nov	9,489	11,106	8,906	10,963	8,153
Dec	7,591	7,493	6,685	8,219	8,862
Total	136,039	126,889	117,229	130,413	128,789

b.

Kentucky Residential Total Service Terminations					
	2015	2016	2017	2018	2019
Jan	298	176	709	639	367
Feb	144	560	551	902	686
Mar	812	1,126	861	761	581
Apr	781	957	642	860	744
May	897	637	1,181	716	764
Jun	1,241	663	884	541	484
Jul	858	585	677	660	762
Aug	775	614	859	758	688
Sep	881	628	783	709	834
Oct	1,064	623	1,064	713	798
Nov	820	728	813	699	623
Dec	804	463	293	543	574
Total	9,375	7,760	9,317	8,501	7,905

c. Duke Energy Kentucky timelines are such that a customer would only receive one termination notice in a month (they would all be unique-monthly). The numbers on a monthly basis would be the same as (a) above. Listed below is the number of unique termination notices per year for the last two years. Duke Energy Kentucky's billing system could only pull the data for the past two years. Prior data is archived and is not readily accessible:

Residential Final Termination Notice (10 Day) Unique Customers

- **2018** – 37,620
- **2019** – 35,951

d. Duke Energy Kentucky timelines are such that a customer would only be terminated once in a month (excluding gas v. electric) (they would all be unique-monthly). The numbers would be the same as (b) above. Listed below is the number of unique service terminations in a year:

Residential Disconnected Non-Payment Unique Customers

- 2018 – 7,635
- 2019 – 7,161

PERSON RESPONSIBLE: OJ Wilson