

VERIFICATION

STATE OF OHIO )  
 )  
COUNTY OF HAMILTON ) SS:

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 2<sup>nd</sup> day of January, 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*  
Trisha Haemmerle, Affiant

Subscribed and sworn to before me by Trisha Haemmerle on this 27<sup>th</sup> day of December, 2019.

*E. Minna Rolfes-Adkins*  
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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**Duke Energy Kentucky**  
**Case No. 2019-00366**  
**Attorney General's First Set Data Requests**  
**Date Received: December 17, 2019**

**AG-DR-01-001**

**REQUEST:**

Refer to Case 2018-00370, wherein DEK proposed to reduce the administrative cost charged by DEK's HEA administrator, Northern Kentucky Community Action Council ("NKCAC"), from the current 15% of program funds distributed to the lessor of actual costs to administer or 10% of the funds distributed, in accordance with a revised Memorandum of Understanding which DEK had reached with NKCAC. Confirm that the Commission denied DEK's proposal in order to pursue this change in the instant docket.

- a. State whether DEK continues to agree that its Memorandum of Understanding with NKCAC should be reduced from the current 15% of program funds distributed, to the lessor or actual costs to administer or 10% of the funds distributed, as DEK had originally proposed.

**RESPONSE:**

The Commission denied Duke Energy Kentucky, Inc.'s proposal by Order dated October 2, 2019 in Case No. 2018-00370. The proposal to reduce the program administrative costs was negotiated with NKCAC based upon the revised program that was proposed in that case, but denied. Duke Energy Kentucky is not opposed to negotiating with NKCAC to reduce the administrative costs under its current and approved HEA program. Given the Commission's decision in 2018-00370 stating that it was going to open a statewide examination of all HEA programs, Duke Energy Kentucky did not make any changes to its

current HEA program. Duke Energy Kentucky is willing to have those discussions with NKCAC.

**PERSON RESPONSIBLE:** Cindy Givens

**Duke Energy Kentucky**  
**Case No. 2019-00366**  
**Attorney General's First Set Data Requests**  
**Date Received: December 17, 2019**

**AG-DR-01-002**

**REQUEST:**

Refer to DEK's Response to Staff 1-7. Confirm that any over/under collection of DEK's HEA charge is trued up as part of the Company's annual DSM rider true-up calculation, and that no unexpended funds are used to rollover to the next program year or to create new HEA program slots.

- a. If confirmed, fully explain why DEK does not rollover unexpended funds to create more slots in the next program year.
- b. Provide the number of available slots in the DEK HEA program for each of the past 5 years.

**RESPONSE:**

- a. The DSM true-up calculation includes the over/under collection spent on the fiscal year's HEA program spend. It was designed this way in 2008 as a way to return funds to customers if the collected funds were not used and to collect for any year funds exceeded collections.
- b. There are no predetermined number of slots for the existing HEA program each year. HEA eligibility is determined by NKCAC when customers apply for LIHEAP and/or WinterCare funds each program year. The number of customers served depends upon the number of customers seeking assistance, whether they qualify to receive funding under the programs' parameters, and the availability of funds.

**PERSON RESPONSIBLE:** Trisha Haemmerle – a.  
Cindy Givens – b.

**Duke Energy Kentucky**  
**Case No. 2019-00366**  
**Attorney General's First Set Data Requests**  
**Date Received: December 17, 2019**

**AG-DR-01-003**

**REQUEST:**

Refer to DEK's Response to Staff 1-8. Explain how DEK call center representatives determine which customers to refer to the HEA agency.

- a. Explain whether information on the program is only provided to certain customers.

If so, explain the factors that go into which customers are selected.

**RESPONSE:**

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**  
**Attorney General's First Set Data Requests**  
**Date Received: December 17, 2019**

**AG-DR-01-004**

**REQUEST:**

Refer to DEK's Response to Staff 1-9. If neither DEK nor its administrator measure how applicants learned of the HEA program, explain how DEK ensures that customers who may qualify for the HEA program have been sufficiently engaged and educated on the available benefits, and how it gauges the effectiveness of its communication efforts.

**RESPONSE:**

Duke Energy Kentucky has historically included bill inserts, emails, website landing pages, and a banner in the winter months notifying all customers of the availability of the WinterCare program. Since its inception, the HEA program has been administered under, and part of, the WinterCare program.

Beginning in the fall of 2019, the Company began to separately list the HEA program on customer bill inserts and on the Company's web page that describe the WinterCare program. Additionally, the HEA program is now specifically described and included as part of the call center's winter refresher training.

**PERSON RESPONSIBLE:**           Cindy Givens