

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 post-formal conference 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 4th day of March, 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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Duke Energy Kentucky
Case No. 2019-00366
Staff First Set Post-Formal Conference Data Requests
Date Received: February 26, 2020

STAFF-PFC-DR-01-001

REQUEST:

Columbia Kentucky, Delta, Duke Kentucky, LG&E, KU, Kentucky Power

Columbia Kentucky, Delta, Duke Kentucky, LG&E, KU, and Kentucky Power, respectively, shall provide the following information for January 1, 2015, until December 31, 2019. If a utility has both electric and gas residential customers, provide the information requested for electric residential customers, gas residential customers, and the total number of residential customers.

- a. Total number of residential customers for each year.
- b. Monthly and annual totals of service termination notices issued to residential customers only for non-payment of bills.
- c. Monthly and annual totals of service termination for residential customers only for non-payment of bills.
- d. Monthly and annual total amount of unique residential customers issued service termination notices for non-payment of bills.
- e. Monthly and annual total amount of unique residential customers with service terminated for non-payment of bills.

RESPONSE:

a. Numbers provided of residential customers by type of services (either gas or electric).

Total Number of KY Residential Customers By Year					
	2015	2016	2017	2018	2019
Electric	122,962	124,307	125,795	126,987	128,049
Gas	89,195	89,990	90,736	91,648	92,448
Total	212,157	214,297	216,531	218,635	220,497

b. Duke Energy Kentucky is not able to provide complete data for 2015, 2016, or 2017, since the information has been archived and purged from our Customer Management System (CMS). CMS stores various types of financial and non-financial history at both a detailed and summary level. The “detailed history” includes the specifics about each transaction that occurred in CMS, such as: if it was an employee or system generated transaction, specific comments or notes, payment method, order details, etc. The “summary level” is the high-level description of the transaction, such as: Payment, Bill Charge, Account Note, etc.

Each month data is purged from CMS; detailed history is archived and purged at 13 months, except for order details which are archived and purged at 24 months. The summary data is archived and purged at approximately 24 months. Duke Energy Kentucky is able to query summary data going back 24 months in CMS, because the data is available in our system tables.

Prior to purging data from our CMS tables, we archive and store the data. The archived data is stored at an account level and can only be recalled by individual account. The CMS archived data was not designed to be queried. A special process would need to be developed in order to pull this data which would include pulling all accounts for each

month to find the necessary transactions. Since this process of pulling data does not currently exist, we cannot guarantee the time it would take to pull the data or if the data would be complete to satisfy this request.

Total 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	136039	126889	117229	130413	128789

Total Electric Service Termination Notices Issued		
	2018	2019
Jan	3,333	3,570
Feb	3,767	4,169
Mar	4,276	4,321
Apr	3,393	4,383
May	3,993	4,080
Jun	2,833	2,536
Jul	3,241	3,063
Aug	4,270	3,694
Sep	3,522	3,433
Oct	3,961	3,658
Nov	3,677	2,809
Dec	2,737	2,842
Total	43,003	42,558

Total Gas Service Termination Notices Issued		
	2018	2019
Jan	459	738
Feb	829	677
Mar	1,266	941
Apr	443	1,076
May	823	631
Jun	490	294
Jul	292	403
Aug	256	253
Sep	249	240
Oct	269	191
Nov	256	129
Dec	275	327
Total	5,907	5,900

Total Combo Service Termination Notices Issued		
	2018	2019
Jan	6,362	6,763
Feb	6,840	7,337
Mar	7,520	7,439
Apr	6,602	7,978
May	7,705	7,910
Jun	5,846	5,298
Jul	6,030	5,735
Aug	8,041	6,636
Sep	6,337	6,652
Oct	7,977	7,673
Nov	7,030	5,215
Dec	5,207	5,693
Total	81,497	80,329

Total Service Termination Notices Issued		
	2018	2019
Jan	10,154	11,071
Feb	11,436	12,183
Mar	13,062	12,701
Apr	10,438	13,437
May	12,521	12,621
Jun	9,169	8,128
Jul	9,563	9,201
Aug	12,567	10,583
Sep	10,108	10,325
Oct	12,207	11,522
Nov	10,963	8,153
Dec	8,219	8,862
Total	130,407	128,787

c.

Kentucky Residential Electric Service Terminations					
	2015	2016	2017	2018	2019
Jan	257	152	607	581	336
Feb	114	540	484	825	675
Mar	721	1,028	795	657	544
Apr	612	846	566	736	693
May	740	532	1,016	612	617
Jun	1,036	572	693	445	403
Jul	678	336	562	563	623
Aug	668	567	708	602	570
Sep	736	539	724	627	774
Oct	950	542	954	673	747
Nov	745	668	727	643	579
Dec	739	364	259	512	530
Total	7,996	6,686	8,095	7,476	7,091

Kentucky Residential Gas Service Terminations					
	2015	2016	2017	2018	2019
Jan	41	24	102	58	31
Feb	30	20	67	77	11
Mar	91	98	66	104	37
Apr	169	111	76	124	51
May	157	105	165	104	147
Jun	205	91	191	96	81
Jul	180	249	115	97	139
Aug	107	47	151	156	118
Sep	145	89	59	82	60
Oct	114	81	110	40	51
Nov	75	60	86	56	44
Dec	65	99	34	31	44
Total	1,379	1,074	1,222	1,025	814

Kentucky Residential Gas/Electric 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	530
Total	9,375	7,760	9,317	8,501	7,861

d. The data provided for the residential customers issued termination notices for non-payment contains only those notices that satisfy the requirement to send the customer a notice ten days prior to disconnection. Duke Energy Kentucky refers to these notices as “Final Ten-Day Notices.” All other notices including the disconnection bill and text/call communications are not included in the numbers provided.

The number of termination notices issued by month are provided below, these are also the number of unique termination notices issued. Based on Duke Energy Kentucky’s disconnection timeline, customers would not be issued multiple ten-day notices in a billing period (30-day period or month). Duke Energy Kentucky’s disconnection timeline is as follows:

- On Day 1 – Bill is Mailed, this bill contains current usage charges
- On Day 21 – Late Payment Charges are added
- On Day 30 – Bill is Mailed (Disconnect Bill), this bill contains past due charges billed previously and new usage charges

- On Day 44 – Termination Notice Mailed (Final Ten-Day Notice)
- On Day 57 – A Two Business Day Text/Call Campaign is attempted, disconnect reminder
- On Day 59 – A Day of Disconnect Text/Call Campaign is attempted, begins at 8am
- On Day 59 – Service is disconnected for non-payment, if the customer fails to make satisfactory payment or arrangements

If at any point during the disconnection timeline the customer makes satisfactory payment or arrangements to avoid disconnection, they will start back down the timeline; at their next billing they will either be at Day 1 if they satisfied the entire past due balance or be at Day 30 if they still have past due charges owed. Therefore, the customer will not receive multiple Final Ten-Day Notices in one billing period or a month's time.

For information regarding Duke Energy Kentucky's data purging procedures, please refer to response 1(b).

Kentucky Unique Residential Service Termination Notices Issued Annually		
	2018	2019
Gas	2,715	2,633
Electric	13,452	12,945
Combo	21,452	20,373
Total	37,619	35,951

e. As described in response 1(d), based on Duke Energy Kentucky's disconnect timeline, the unique number of services terminated for non-payment are also equal to the monthly breakdown provided above in 1(c). If a customer is disconnected for non-payment and makes satisfactory payment or arrangements to restore their service, the

customer will start back down the timeline, and receive all required notices prior to being disconnected again. Therefore, the customer will not have the same service disconnected multiple times in one billing period or a month's time. The unique number of customers terminated for non-payment annually is listed below:

Unique Residential Customers Disconnected For Non-Payment

- 2018 – 7,635
- 2019 – 7,161

PERSON RESPONSIBLE: OJ Wilson

Duke Energy Kentucky
Case No. 2019-00366
Staff First Set Post-Formal Conference Data Requests
Date Received: February 26, 2020

STAFF-PFC-DR-01-002

REQUEST:

Columbia Kentucky, Delta, Duke Kentucky, LG&E, KU, Kentucky Power

For each month from January 1, 2015, to December 31, 2019, Columbia Kentucky, Delta, Duke Kentucky, LG&E, KU, and Kentucky Power, respectively, should provide the total number of LIHEAP recipients, HEA recipients and customers who received both LIHEAP and HEA benefits.

RESPONSE:

The LIHEAP and HEA data requested is provided in the tables below. However, most of the data for 2015, 2016 and 2017 has been purged from Duke Energy Kentucky Customer Management System tables. Please see response to STAFF-PFC-DR-01-001(b) for more detailed information.

LIHEAP Recipients:

Month	2015	2016	2017	2018	2019	Grand Total
Jan	2	3	5	664	832	1506
Feb	4	13	15	963	1014	2009
Mar	2	13	13	940	1047	2015
Apr		4	12		557	573
May		6	4	1	130	141
Jun				44		44
Jul						0
Aug						0
Sep						0
Oct						0
Nov	4	19	15	1242	934	2214
Dec	2	4	14	559	383	962
Grand Total	14	62	78	4413	4897	9464

HEA Recipients:

Month	2015	2016	2017	2018	2019	Grand Total
Jan					64	64
Feb		1			55	56
Mar		1	1	68	400	470
Apr		1	1	123	179	304
May		8	4	135	68	215
Jun	1	1	1	114	44	161
Jul		2	1	132	114	249
Aug		8	3	123	110	244
Sep	2	3		97	3	105
Oct	1	1	1	76	56	135
Nov	1		4	155	130	290
Dec		2	2	103	130	237
Grand Total	5	28	18	1126	1353	2530

Recipients receiving LIHEAP & HEA benefits in same month:

Month	2015	2016	2017	2018	2019	Grand Total
Jan					29	29
Feb		1			35	36
Mar		1	1	31	352	385
Apr		1	1		101	103
May		2			11	13
Jun						0
Jul						0
Aug						0
Sep						0
Oct						0
Nov	1		3	150	127	281
Dec			1	77	54	132
Grand Total	1	5	6	258	709	979

PERSON RESPONSIBLE: Cindy Givens

Duke Energy Kentucky
Case No. 2019-00366
Staff First Set Post-Formal Conference Data Requests
Date Received: February 26, 2020

STAFF-PFC-DR-01-003

REQUEST:

Columbia Kentucky, Delta, Duke Kentucky, LG&E, KU, Kentucky Power

For each month from January 1, 2015, to December 31, 2019, Columbia Kentucky, Delta, Duke Kentucky, LG&E, KU, and Kentucky Power, respectively, should provide the monthly total average residential bill that includes the cost of current service and arrearages. For utilities that provide gas and electric service, break out the amounts by gas-only, electric-only, and combined gas and electric customers.

RESPONSE:

Duke Energy Kentucky is unable to pull this information for 2015, 2016, and 2017. Please see response to STAFF-PFC-DR-01-001(b) for more detailed information.

Kentucky Residential Average Bill – Electric-Only			Kentucky Residential Average Bill – Gas-Only			Kentucky Residential Average Bill - Combination		
	2018	2019		2018	2019		2018	2019
Jan	\$354.71	\$372.28	Jan	\$271.29	\$268.75	Jan	\$363.94	\$375.54
Feb	\$331.41	\$369.96	Feb	\$253.54	\$249.69	Feb	\$343.60	\$367.92
Mar	\$299.63	\$335.41	Mar	\$190.23	\$217.30	Mar	\$298.94	\$325.36
Apr	\$280.55	\$297.35	Apr	\$185.24	\$161.38	Apr	\$276.25	\$271.26
May	\$296.43	\$302.27	May	\$121.94	\$110.31	May	\$251.94	\$225.59
Jun	\$328.83	\$322.49	Jun	\$80.23	\$79.90	Jun	\$271.20	\$240.97
Jul	\$352.90	\$308.01	Jul	\$66.23	\$64.95	Jul	\$296.81	\$254.09
Aug	\$317.03	\$299.39	Aug	\$60.07	\$62.25	Aug	\$274.95	\$240.63
Sep	\$316.61	\$292.14	Sep	\$53.72	\$61.54	Sep	\$276.10	\$229.50
Oct	\$304.81	\$289.50	Oct	\$50.60	\$56.72	Oct	\$249.41	\$209.33
Nov	\$288.73	\$264.83	Nov	\$101.63	\$91.90	Nov	\$242.26	\$200.07
Dec	\$328.20	\$344.56	Dec	\$200.45	\$178.57	Dec	\$311.86	\$281.19

PERSON RESPONSIBLE: Cindy Givens

Duke Energy Kentucky
Case No. 2019-00366
Staff First Set Post-Formal Conference Data Requests
Date Received: February 26, 2020

STAFF-PFC-DR-01-004

REQUEST:

Columbia Kentucky, Delta, Duke Kentucky, LG&E, KU, Kentucky Power

Columbia Kentucky, Delta, Duke Kentucky, LG&E, KU, and Kentucky Power, respectively, should explain how its process currently in place for disconnection of residential service for non-payment complies with the applicable sections of 807 KAR 5:006, Sections 14 and 15. Provide sample bills or inserts that evidence compliance with those applicable sections.

RESPONSE:

Please see response to STAFF-PFC-DR-01-001(d). Also, see STAFF-PFC-DR-01-004 Attachments 1 and 2.

PERSON RESPONSIBLE: OJ Wilson

ENERGY ASSISTANCE

Residential customers may qualify for energy assistance. Contact the local CAC serving your county.

- Boone County CAC.....859.586.9250
- Pendleton County CAC.....859.654.4054
- Kenton County CAC.....859.291.8607
- Grant County CAC.....859.824.4768
- Gallatin County CAC.....859.567.4660
- Owen County CAC.....502.484.2116
- Campbell County CAC859.431.4177
- Carroll County CAC.....502.732.5253

United Way Referral Services – call 211

RESTORING SERVICE

If your service has been disconnected, you will be required to satisfy all of the following in order to restore service(s):

- Pay the entire past-due balance or the past-due amount of any extended payment plan.
- Pay a reconnection charge.
- Pay a security deposit (if applicable).

CONTACT INFORMATION

Credit Department

Our customer care specialists are available

Monday through Friday 7 a.m. to 7 p.m.

For added convenience, you can get information anytime using our automated system.

Telephone number: 800.544.6900



**Kentucky Residential
Disconnection Notice**

According to our records, your account is past due. To avoid disconnection of your natural gas and/or electric service(s), please pay the amount noted on the enclosed bill. Please see the "IMPORTANT" message box in the body of the bill for the amount to pay and the date the payment needs to be made to avoid disconnection.

A Duke Energy employee may not visit your home on the day electric service is scheduled for disconnection. Rather, we will attempt to contact you by text and/or phone message.

As a reminder, Duke Energy will never demand payment in the form of a prepaid debit or prepaid credit card. If you have concerns about the authenticity of a request for payment, please contact Duke Energy directly.

AVOIDING DISCONNECTION

To avoid disconnection, it will be necessary to satisfy one or more of the following options by the date noted on the bill:

- Pay the amount shown on the enclosed bill (see "IMPORTANT" message box in the body of the bill).
- Pay the entire past-due balance.
- Pay the past-due amount of any extended payment plan.
- Pay any past-due security deposit.

- Pay the required amount to set up an extended payment plan (applicable to qualified customers only).
- Provide a Medical Certification (see information on Page 3).

To learn more about how to maintain your gas and/or electric service(s), please review the additional information in this notice and/or contact our Credit Department at 800.544.6900.

SPECIAL WINTER PROVISIONS (November 1 through March 31)

CAC ENERGY ASSISTANCE PROGRAM

If you have been certified by your local Community Action Commission (CAC) as being eligible for the state's Energy Assistance Program (EAP), you may apply for a 30-day extension and an extended payment plan on your gas and/or electric bill. Present Duke Energy the certificate, which verifies your eligibility for EAP assistance, and you must satisfy the following:

- Make a good faith payment toward your indebtedness.
- Set up a payment plan to bring your account current as soon as possible, but no later than October 15.

WINTER HARDSHIP RECONNECTION

Customers who are disconnected for nonpayment and are income eligible may qualify for this reconnection program.

- Obtain a certificate of financial need from the Community Action Commission (CAC). See Page 3 to find the CAC contact information for your county.
- Pay one-third (1/3) of your outstanding bill or \$200, whichever is less.

- Set up a payment plan to bring your account current as soon as possible, but no later than October 15.
- If your balance exceeds \$600, pay the current charges, make a good faith reduction in the remaining balance and set up a payment plan to bring your account current as soon as possible.
- Pay a reconnection fee.

MEDICAL CERTIFICATION

If a member of your household is presently under the care of a physician, and the disconnection of your residential gas and/or electric service(s) would aggravate the medical condition, you may request a Medical Certification form to postpone disconnection of your services. You may apply for a Medical Certification by:

- Having a medical professional call our Credit Department.
- Requesting a Medical Certification form be sent to your medical professional.

PAYMENT OPTIONS

Payments can be made by any of the following methods:

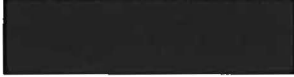
- Pay by phone with electronic check or credit card (VISA and MasterCard). Please call 877.596.5068.
- Pay at one of our pay stations. Please contact our Credit Department to locate a pay station near you, or visit our website at duke-energy.com.
- Pay online at duke-energy.com.



FINAL DISCONNECTION NOTICE

Account Number: [REDACTED]

000094 000000200



NOTICE DATE: 08/30/2019

AMOUNT TO AVOID DISCONNECTION: \$207.01

According to our records, you have not responded to our recent notice about your overdue utility and/or security deposit bill. To maintain your gas and/or electric service(s), please pay the amount noted above, or make satisfactory payment arrangements within ten (10) calendar days from the date indicated above.

A Duke Energy employee may not visit your home on the day electric service is scheduled for disconnection. Rather, we will attempt to contact you by text and/or phone message.

As a reminder, Duke Energy will never demand payment in the form of a prepaid debit or prepaid credit card. If you have concerns about the authenticity of a request for payment, please contact Duke Energy directly.

AVOIDING DISCONNECTION

To avoid disconnection it will be necessary to satisfy one of the following options:

- Pay the amount noted above
- Pay the entire past-due balance
- Pay the past-due amount of any extended payment plan
- Pay any past-due security deposit
- Pay the required amount to set-up an extended payment plan
- Provide a Medical Certification

EXTENDED PAYMENT PLANS

Eligible residential customers may request reduced payments to avoid disconnection by contacting the Credit Department.

- Extended Payment Plans require equal payments on the arrearages in addition to full payment on the current bill. If you miss a payment under an Extended Payment Plan, the entire past due amount will become immediately due, and other credit arrangements may not be available.
- Separation of Service is an extended payment plan to retain either the gas or electric service as chosen by the customer if unable to make satisfactory payment arrangements for both services.

MEDICAL CERTIFICATION If a member of your household is presently under the care of a physician, and the disconnection of your residential gas and/or electric service(s) would aggravate the medical condition, you may request a Medical Certification form to postpone disconnection of your services for thirty (30) days after the scheduled date of termination. You may apply for a Medical Certification by:

- Having a medical professional call our Credit Department
- Requesting a Medical Certification form be sent to your medical professional

PAYMENT OPTIONS

Payments can be made by any of the following methods:

- Pay over the phone by electronic check, debit card or credit card. Please call 1-877-596-5068.
- Pay at a Pay Station. Visit www.duke-energy.com or contact our Credit Department to locate a Pay Station near you.
- Pay online at www.duke-energy.com

MORE IMPORTANT INFORMATION ABOUT YOUR SERVICE ON THE OTHER SIDE

NORTHERN KENTUCKY
COMMUNITY ACTION COMMISSION
Subsidy EAP, Crisis EAP and Wintercare

Boone County
6555 Nicholas
Florence, KY 41042
859-586-9250

Kenton County
1561 Madison Ave.
Covington, KY 41011
859-291-8607

Campbell County
437 West 9th St
Newport, KY 41071
859-431-4177

Grant County
1116 N. Main St
Williamstown, KY 41097
859-824-4768

Gallatin County
100 Davis Street
Warsaw, KY 41095
859-567-4660

Pendleton County
311 Park St.
Falmouth, KY 41040
859-654-4054

Owen County
109 S Madison St.
Owenton, KY 40359
502-484-2116

Carroll County
1302 Highland
Carrolton, KY 41088
502-732-5253

United Way Referral Service – Call 211

SPECIAL WINTER PROVISIONS CAC ENERGY ASSISTANCE PROGRAM
(Available for residential customers November 1 through March 31)

If you have been certified by your local Community Action Commission (CAC) as being eligible for the state's Energy Assistance Program (EAP), you may apply for a thirty (30) day extension and an extended payment plan on your gas and/or electric bill. Present Duke Energy the certificate, which certifies your eligibility for EAP assistance, and you must satisfy the following:

- Make a good faith payment toward your indebtedness
- Set up a payment plan to bring your account current as soon as possible, but no later than October 15
- Please contact your local CAC office (see list above)

SPECIAL WINTER RECONNECTION RULE OF THE PUBLIC SERVICE COMMISSION
(Available for residential customers November 1 through March 31)

Customers who are disconnected for nonpayment and are income eligible may qualify for this reconnection program by completing all of the following:

- Obtain a certificate of financial need from the Community Action Commission Office (see list above)
- Pay one-third (1/3) of your outstanding bill or \$200, whichever is less; and
- Set up a payment plan to bring your account current as soon as possible, but no later than October 15
- If your balance exceeds \$600, pay the current charges, make a good faith reduction in the remaining balance and set up a payment plan to bring your account current as soon as possible

RESTORING SERVICE

If your service has been disconnected you will be required to satisfy all of the following in order to restore service(s):

- Pay the entire past-due balance or the past-due amount of any extended payment plan
- Pay a reconnection charge
- Pay a security deposit (if applicable)

Please Read the Special Winter Provisions which may apply to you (see above)

DISPUTED BILLS

You have a right to dispute the reason for this pending disconnection. Please contact our Customer Services Department immediately if you dispute this matter.

CONTACT INFORMATION

If you have any questions about your bill, or this disconnection notice, please contact our Customer Service Department at 1-800-544-6900. Our representatives are available 7:00 a.m. to 7:00 p.m. Monday through Friday.

**Duke Energy Kentucky
Case No. 2019-00366
Staff First Set Post-Formal Conference Data Requests
Date Received: February 26, 2020**

STAFF-PFC-DR-01-005

REQUEST:

Kentucky Utilities

Confirm that a customer can only receive Wintercare if they have received a disconnect notice from the utility.

RESPONSE:

Not applicable to Duke Energy Kentucky.

PERSON RESPONSIBLE: N/A

**Duke Energy Kentucky
Case No. 2019-00366
Staff First Set Post-Formal Conference Data Requests
Date Received: February 26, 2020**

STAFF-PFC-DR-01-006

REQUEST:

Kentucky-American

Explain whether Kentucky-American considers forgiveness of arrears in concert with existing Home Energy Assistance (HEA) program.

RESPONSE:

Not applicable to Duke Energy Kentucky.

PERSON RESPONSIBLE: N/A

Duke Energy Kentucky
Case No. 2019-00366
Staff First Set Post-Formal Conference Data Requests
Date Received: February 26, 2020

STAFF-PFC-DR-01-007

REQUEST:

Columbia Kentucky

Refer to Columbia Kentucky's Response to Staff's Third Request for Information, No. 1 Amendment.

a. For all residential customers, provide the following information for each of the last five years:

(1) The average monthly bill for all residential customers for each month from November to March.

(2) The average monthly bill for residential customers receiving HEA benefits for each month from November to March.

(3) The average monthly bill for residential customers receiving LIHEAP benefits for each month from November to March.

b. For all HEA customers, provide the following prior to the HEA credit is applied:

(1) The average monthly bill for all residential customers for each month from November to March.

(2) The average monthly bill for residential customers receiving HEA benefits for each month from November to March.

(3) The average monthly bill for residential customers receiving LIHEAP benefits for each month from November to March.

RESPONSE:

Not applicable to Duke Energy Kentucky.

PERSON RESPONSIBLE: N/A

**Duke Energy Kentucky
Case No. 2019-00366
Staff First Set Post-Formal Conference Data Requests
Date Received: February 26, 2020**

STAFF-PFC-DR-01-008

REQUEST:

Columbia Kentucky

Provide the bill insert for the HEA program provided to customers when a termination notice is mailed.

RESPONSE:

Not applicable to Duke Energy Kentucky.

PERSON RESPONSIBLE: N/A

**Duke Energy Kentucky
Case No. 2019-00366
Staff First Set Post-Formal Conference Data Requests
Date Received: February 26, 2020**

STAFF-PFC-DR-01-009

REQUEST:

Columbia Kentucky

For the last five years, provide the administration fees payed for the HEA program as a percentage of actual funds distrusted.

RESPONSE:

Not applicable to Duke Energy Kentucky.

PERSON RESPONSIBLE: N/A

**Duke Energy Kentucky
Case No. 2019-00366
Staff First Set Post-Formal Conference Data Requests
Date Received: February 26, 2020**

STAFF-PFC-DR-01-010

REQUEST:

CAK

Identify the differences in the application process between an application for a subsidy and an application for crisis so to support different costs associated with each.

RESPONSE:

Not applicable to Duke Energy Kentucky.

PERSON RESPONSIBLE: N/A

Duke Energy Kentucky
Case No. 2019-00366
Staff First Set Post-Formal Conference Data Requests
Date Received: February 26, 2020

STAFF-PFC-DR-01-011

REQUEST:

CAK

Explain whether there is a correlation between a county's LIHEAP fund allocation and the number of empty HEA slots for that county.

RESPONSE:

Not applicable to Duke Energy Kentucky.

PERSON RESPONSIBLE: N/A

**Duke Energy Kentucky
Case No. 2019-00366
Staff First Set Post-Formal Conference Data Requests
Date Received: February 26, 2020**

STAFF-PFC-DR-01-012

REQUEST:

CAK

Prove the amount of counsel fees that are related to case intervention and charged against the HEA programs for the last five years.

RESPONSE:

Not applicable to Duke Energy Kentucky.

PERSON RESPONSIBLE: N/A

**Duke Energy Kentucky
Case No. 2019-00366
Staff First Set Post-Formal Conference Data Requests
Date Received: February 26, 2020**

STAFF-PFC-DR-01-013

REQUEST:

Duke Kentucky

Refer to Duke Kentucky's response to Commission Staff's Third Request for Information, Item 6. Provide the averages requested in subparts b and c broken out by residential gas-only, electric-only, and combined gas and electric.

RESPONSE:

Please see response to STAFF-PFC-DR-01-001(b) and STAFF-PFC-DR-01-001(c).

PERSON RESPONSIBLE: OJ Wilson

**Duke Energy Kentucky
Case No. 2019-00366
Staff First Set Post-Formal Conference Data Requests
Date Received: February 26, 2020**

STAFF-PFC-DR-01-014

REQUEST:

LG&E

The purpose of the Affordable Energy Corporation (AEC) is to increase the affordability of a customer's utilities. Explain whether the affordability measure, or the percent of utility bill for income, has ever been readjusted. If so, explain the amount of and the reasons for the readjustment.

RESPONSE:

Not applicable to Duke Energy Kentucky.

PERSON RESPONSIBLE: N/A

**Duke Energy Kentucky
Case No. 2019-00366
Staff First Set Post-Formal Conference Data Requests
Date Received: February 26, 2020**

STAFF-PFC-DR-01-015

REQUEST:

LG&E

Provide the following information by month for each month between January 1, 2015, and December 31, 2019.

- a. The average monthly residential bill for electric-only customers.
- b. The average monthly residential bill for gas-only customers.
- c. The average monthly residential bill for combined gas and electric customers.

RESPONSE:

Not applicable to Duke Energy Kentucky.

PERSON RESPONSIBLE: N/A

**Duke Energy Kentucky
Case No. 2019-00366
Staff First Set Post-Formal Conference Data Requests
Date Received: February 26, 2020**

STAFF-PFC-DR-01-016

REQUEST:

LG&E

Refer to LG&E's response to Commission Staff's Third Request for Information, Item 10.

Provide the averages requested in subparts band c broken out by residential gas-only, electric-only and combined gas and electric.

RESPONSE:

Not applicable to Duke Energy Kentucky.

PERSON RESPONSIBLE: N/A

Duke Energy Kentucky
Case No. 2019-00366
Staff First Set Post-Formal Conference Data Requests
Date Received: February 26, 2020

STAFF-PFC-DR-01-017

REQUEST:

LG&E

Provide the average administration fee paid to Wintercare and the percent of this payment as compared to total funds distributed to Wintercare for the last three years.

RESPONSE:

Not applicable to Duke Energy Kentucky.

PERSON RESPONSIBLE: N/A

**Duke Energy Kentucky
Case No. 2019-00366
Staff First Set Post-Formal Conference Data Requests
Date Received: February 26, 2020**

STAFF-PFC-DR-01-018

REQUEST:

KU

State whether legal fees incurred by Community Action Council of Lexington-Fayette, Bourbon, Harrison, and Nicholas Counties, Inc., as a result of intervening in KU's rate cases since 2014, were included in HEA administrative fees charged to and paid by KU.

RESPONSE:

Not applicable to Duke Energy Kentucky.

PERSON RESPONSIBLE: N/A

**Duke Energy Kentucky
Case No. 2019-00366
Staff First Set Post-Formal Conference Data Requests
Date Received: February 26, 2020**

STAFF-PFC-DR-01-019

REQUEST:

Delta

Provide the annual average of past-due accounts for the past five years.

RESPONSE:

Not applicable to Duke Energy Kentucky.

PERSON RESPONSIBLE: N/A

**Duke Energy Kentucky
Case No. 2019-00366
Staff First Set Post-Formal Conference Data Requests
Date Received: February 26, 2020**

STAFF-PFC-DR-01-020

REQUEST:

Delta

Provide the training materials referencing the HEA program used by the Customer Service Representatives and the materials used when hand delivering termination notices to homes.

RESPONSE:

Not applicable to Duke Energy Kentucky.

PERSON RESPONSIBLE: N/A