

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In The Matter of:

The Electronic Application of Duke)
Energy Kentucky, Inc., for: 1) An)
Adjustment of the Natural Gas Rates; 2)) Case No. 2021-00190
Approval of New Tariffs; and 3) All)
Other Required Approvals and Relief.)

DUKE ENERGY KENTUCKY, INC.’S
MOTION FOR REHEARING OR CLARIFICATION

Comes now Duke Energy Kentucky, Inc. (Duke Energy Kentucky or Company), by counsel, pursuant to KRS 278.400 and other applicable law, and does hereby tender its Motion for Rehearing or Clarification on the Order entered on December 28, 2021 by the Kentucky Public Service Commission (Commission) in this docket, respectfully stating as follows:

1. Bad Check Fee

The Commission entered a Final Order in this case on December 28, 2021. As part of that Order, the Commission reduced the charge that Duke Energy Kentucky may apply to bad check payments from \$11 to \$5 for natural gas customer accounts.¹ The change does not apply to the Company’s electric accounts.² While Duke Energy Kentucky may easily adjust the bad check charge for natural gas-only accounts, Duke Energy Kentucky’s billing system does not allow it to distinguish between charges of this nature for customers who have both electric and gas accounts. These combined customers must have a single charge for tendering bad checks. In addition, while Duke Energy Kentucky appreciates the Commission limiting the scope of the Order to only the

¹ See Order, p. 25.

² See *id.*

type of service at issue in the rate case, it would be administratively easier and less burdensome to keep all of its accounts on the same bad check charge schedule. In light of these facts, Duke Energy Kentucky seeks rehearing or clarification so that it may be allowed to reduce its bad check charge for all types of accounts – natural gas, electric and combined natural gas and electric – to the \$5 charge set forth in the Commission’s Order.³ If this is acceptable, Duke Energy Kentucky would need the Commission’s December 28th Order to be clarified such that it could amend its electric tariff to charge the same bad check charge of \$5 to all customer accounts.⁴ Due to the *de minimus* nature of the bad check charge as applied to electric accounts, the Company is not seeking any additional adjustment to its electric rates at this time.

2. Waiver of Residential Late Fees

The Commission’s Order also gives rise to a similar issue with regard to the waiver of late payment fees for residential natural gas accounts where a pledge of payment has been received from an authorized agency.⁵ The Company will soon be filing a natural gas tariff to conform to the Order, however, it will be much easier to administer the change in billing practices if the same change also applies to electric and combined account customers. Thus, Duke Energy Kentucky respectfully requests the Commission’s approval to extend the waiver of late payment charges to residential natural gas customer accounts where a pledge of payment has been received from an authorized agency to residential electric and combined account customers as well.

³ Duke Energy Kentucky reserves the right to request and seek a higher bad check charge in future filings.

⁴ See, e.g., *In the Matter of the Electronic Application of Duke Energy Kentucky, Inc. for Authority to: 1) Adjust Natural Gas Rates; 2) Approval of a Decoupling Mechanism; 3) Approval of New Tariffs; and 4) For all Other Required Approvals, Waivers and Relief*, Order Case No. 2018-00261 (Ky. P.S.C. March 27, 2019) (denying request to allow a tariff for natural gas service to refer to the electric tariff for a reconnection charge).

⁵ See Order, pp. 27-28.

WHEREFORE, on the basis of the foregoing, Duke Energy Kentucky, Inc., respectfully requests the Commission to grant rehearing on, or otherwise clarify, the issue raised herein.

This 13th day of January 2022.

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 electronic filing that was transmitted to the Commission on January 13, 2022 and that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding.



Counsel for Duke Energy Kentucky, Inc.