

VERIFICATION

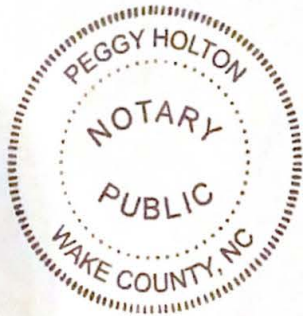
STATE OF NORTH CAROLINA            )  
  )    SS:  
COUNTY OF WAKE                    )

The undersigned, Melissa Adams, Director Analytics, 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.

Melissa Adams  
Melissa Adams, Affiant

Subscribed and sworn to before me by Melissa Adams on this 25 day of October, 2022.

Peggy Holton  
NOTARY PUBLIC



My Commission Expires: 12-22-2026

**KyPSC Case No. 2022-00251**  
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**Duke Energy Kentucky**  
**Case No. 2022-00251**  
**Attorney General's Second Set Data Requests**  
**Date Received: October 7, 2022**

**SUPPLEMENTAL AG-DR-02-017**

**REQUEST:**

Refer to DEK's demand-side management programs ("DSM") generally. Provide the average cost to recruit a residential customer participant to a DSM program across all DSM programs.

**RESPONSE:**

Objection. This request is overbroad, unduly burdensome, and seeks information that is irrelevant to the case, insofar as it seeks information that is not maintained or calculated by the Company and insofar as it seeks information related to other jurisdictions besides Kentucky. Notwithstanding these objections, to the extent discoverable and in the spirit of discovery, the Company has not performed such a cost analysis.

**SUPPLEMENTAL RESPONSE:**

Objection. This request is overbroad, unduly burdensome, and seeks information that is irrelevant to the case, insofar as it seeks information that is not maintained or calculated by the Company. The Company does not calculate or track "average cost to recruit a residential customer participant to a DSM program across all DSM programs." Objecting further, the request is vague and ambiguous and subject to interpretation as to what is meant by this phrase. Notwithstanding these objections, to the extent discoverable and in the spirit of discovery, the Company spent \$204,828.42 between 7/1/2021 and 6/30/2022 in direct marketing costs for those residential programs which have dedicated direct marketing costs. Additionally, the Company spent \$109,261.45 during this time period for DSM

marketing that was not dedicated to any single program, but rather benefiting the portfolio as a whole. The aforementioned amounts do not capture all costs of recruiting program participants because most programs rely on vendors to procure participation and the Company does not separately track the amounts expended by vendors on procuring program participants. Any such amounts are not included in the \$204,828.42 and \$109,261.45 figures provided. Regarding residential customer participants, there were 4,785 unique residential accounts that participated in Duke Energy Kentucky's traditional EE programs from 7/1/2021 to 6/30/2022. Power Manager had 12,267 unique residential accounts participating during the same timeframe.

**PERSON RESPONSIBLE:** As to objections, Legal  
As to response, Melissa Adams