

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF DUKE ENERGY )      CASE No.  
KENTUCKY, INC. TO AMEND ITS DEMAND SIDE )      2022-00251  
MANAGEMENT PROGRAMS )

**ATTORNEY GENERAL’S SUPPLEMENTAL DATA REQUESTS**

The intervenor, the Attorney General of the Commonwealth of Kentucky, through his Office of Rate Intervention [“OAG”], hereby submits the following Supplemental Data Requests to Duke Energy Kentucky, Inc. [“DEK” or “the Company”] to be answered by the date specified in the Commission’s Orders of Procedure, and in accord with the following:

- (1) In each case where a request seeks data provided in response to a staff request, reference to the appropriate request item will be deemed a satisfactory response.
- (2) Identify the witness who will be prepared to answer questions concerning each request.
- (3) Repeat the question to which each response is intended to refer. The OAG can provide counsel for DEK with an electronic version of these questions in native format, upon request.
- (4) These requests shall be deemed continuing so as to require further and supplemental responses if the Companies receive or generate additional information within the scope of these requests between the time of the response and the time of any hearing conducted hereon.
- (5) Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association, be accompanied by a signed certification of the preparer or person supervising the preparation of the response on behalf of the entity

that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

(6) If you believe any request appears confusing, request clarification directly from Counsel for OAG.

(7) To the extent that the specific document, workpaper or information as requested does not exist, but a similar document, workpaper or information does exist, provide the similar document, workpaper, or information.

(8) To the extent that any request may be answered by way of a computer printout, identify each variable contained in the printout which would not be self-evident to a person not familiar with the printout.

(9) If the Companies have objections to any request on the grounds that the requested information is proprietary in nature, or for any other reason, notify OAG as soon as possible.

(10) As used herein, the words "document" or "documents" are to be construed broadly and shall mean the original of the same (and all non-identical copies or drafts thereof) and if the original is not available, the best copy available. These terms shall include all information recorded in any written, graphic or other tangible form and shall include, without limiting the generality of the foregoing, all reports; memoranda; books or notebooks; written or recorded statements, interviews, affidavits and depositions; all letters or correspondence; telegrams, cables and telex messages; contracts, leases, insurance policies or other agreements; warnings and caution/hazard notices or labels; mechanical and electronic recordings and all information so stored, or transcripts of such recordings; calendars, appointment books, schedules, agendas and diary entries; notes or memoranda of conversations (telephonic or otherwise), meetings or conferences; legal pleadings and transcripts of legal proceedings;

maps, models, charts, diagrams, graphs and other demonstrative materials; financial statements, annual reports, balance sheets and other accounting records; quotations or offers; bulletins, newsletters, pamphlets, brochures and all other similar publications; summaries or compilations of data; deeds, titles, or other instruments of ownership; blueprints and specifications; manuals, guidelines, regulations, procedures, policies and instructional materials of any type; photographs or pictures, film, microfilm and microfiche; videotapes; articles; announcements and notices of any type; surveys, studies, evaluations, tests and all research and development (R&D) materials; newspaper clippings and press releases; time cards, employee schedules or rosters, and other payroll records; cancelled checks, invoices, bills and receipts; and writings of any kind and all other tangible things upon which any handwriting, typing, printing, drawings, representations, graphic matter, magnetic or electrical impulses, or other forms of communication are recorded or produced, including audio and video recordings, computer stored information (whether or not in printout form), computer-readable media or other electronically maintained or transmitted information regardless of the media or format in which they are stored, and all other rough drafts, revised drafts (including all handwritten notes or other marks on the same) and copies of documents as hereinbefore defined by whatever means made.

(11) For any document withheld on the basis of privilege, state the following: date; author; addressee; indicated or blind copies; all persons to whom distributed, shown, or explained; and, the nature and legal basis for the privilege asserted.

(12) In the event any document called for has been destroyed or transferred beyond the control of the Companies, state: the identity of the person by whom it was destroyed or transferred, and the person authorizing the destruction or transfer; the time, place, and

method of destruction or transfer; and, the reason(s) for its destruction or transfer. If destroyed or disposed of by operation of a retention policy, state the retention policy.

(13) Provide written responses, together with any and all exhibits pertaining thereto, in one or more bound electronic volumes, separately indexed and tabbed by each response, in compliance with Kentucky Public Service Commission Regulations and Orders.

(14) “And” and “or” should be considered to be both conjunctive and disjunctive, unless specifically stated otherwise.

(15) “Each” and “any” should be considered to be both singular and plural, unless specifically stated otherwise.

Respectfully submitted,

DANIEL CAMERON  
ATTORNEY GENERAL



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*Certificate of Service*

Pursuant to the Commission's Orders in Case No. 2020-00085, and in accord with all other applicable law, Counsel certifies that an electronic copy of the forgoing was served and filed by e-mail to the parties of record.

This 7<sup>th</sup> day of October, 2022



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Assistant Attorney General

Electronic Application Of Duke Energy  
Kentucky, Inc. To Amend Its Demand Side  
Management Programs  
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1. Provide the amount of the credit, in terms of dollars and cents, that the average program participant received. Provide this information for both those participants who receive the \$0.60 / kWh credit, and for those who receive the \$1.20 / kWh credit.
2. Provide the cumulative total amount of credits, in terms of monetary savings, that program participants have experienced to date.
3. For each Critical Peak Event ("CPE"), provide the percentage of participants who responded by reducing consumption.
4. Reference the Confidential Attachment to Staff DR 1-002.
  - a. At p. 3 of 8, paragraph 1, explain why [REDACTED].
  - b. At p. 3 of 8, paragraph 2, explain the criteria that would be used for [REDACTED]. Explain also the nature of [REDACTED].
  - c. At p. 3 of 8, paragraph 3, explain the meaning of [REDACTED].
  - d. At p. 3 of 8, paragraph 5, explain: (i) whether the [REDACTED]; and (ii) whether the [REDACTED].
  - e. At p. 7, confirm that [REDACTED].

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5. Refer to Attachment 2 provided by the Company in response to AG-DR-01-005. Please provide this Attachment in MS Excel spreadsheet format.
6. Refer to the Company's response to AG-DR-01-010 and the statement "If the amount of generation is less than the actual customer demand in an hour, a purchase from PJM occurred."
  - a. Confirm that in the vast majority of hours during which PTR events were called, a purchase from PJM occurred. If this cannot be confirmed, please explain.
  - b. Confirm that when purchases from PJM occur, the costs to Duke Energy Kentucky are settled at the real time LMP energy prices, such as those provided in response to AG-DR-01-009. If this cannot be confirmed, please explain.
7. Refer to the Company's response to STAFF-DR-01-006 (b), which states "At enrollment, all participants received an email with a link to the program's information page including the FAQs (Frequently Asked Questions)." Please provide screen shots of the entire information page, including all FAQs and all "Tips to help you reduce your usage and other pilot reminders."
8. Refer to the Company's response to AG-DR-01-017 (c). Provide:
  - a. The email notice sent in advance of each PTR event;
  - b. The Peak Time Credit Acquisition email;
  - c. The Peak Time Credit Reminder email;
  - d. The 2021 Summer Season Change email;
  - e. The 2022 Summer Season Change email;
  - f. The Winter Reminder/Season Change email.
9. Refer to Confidential Attachment 1 provided in response to AG-DR-01-021.

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- a. Confirm that the Company [REDACTED] the [REDACTED] [REDACTED] (benefit) of the PTR program. If this is confirmed, please explain why the Company chose [REDACTED] [REDACTED] (benefit). If this cannot be confirmed, please indicate where in Confidential Attachment 1 the [REDACTED] (benefit) of the PTR program.
  - b. Please explain why [REDACTED] is not included as a benefit in [REDACTED] tests.
10. Refer to Attachment 2 provided in response to AG-DR-01-021, and the line item "Billing System Credit Entry."
- a. Describe this program cost and its cost components. Identify each cost component as a fixed costs or a variable cost, and the basis for cost variation (i.e., participant counts).
  - b. Explain how this program cost was estimated, including all assumptions, estimates, and calculations.
  - c. Explain how billing system credit entry might be automated in the future, and estimate the development cost of such automation.
11. Refer to Attachment 2 provided in response to AG-DR-01-021, and the line item "CCO Program Support and DR Implementation."
- a. Describe this program cost and its cost components. Identify each cost component as a fixed costs or a variable cost, and the basis for cost variation (i.e., counts of offers issued, participant counts, participant calls, calls per participant, etc.).
  - b. Explain how this program cost was estimated, including all assumptions, estimates, and calculations.
  - c. Explain how, and estimate the size of (in percent), reductions in this cost will be realized if other Duke Energy subsidiaries with smart meters, including Ohio, North Carolina, and South Carolina, were to offer a PTR program.



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12. Refer to Attachment 2 provided in response to AG-DR-01-021, and the line item "Credit Calculations."
  - a. Describe this program cost and its cost components. Identify each cost component as a fixed costs or a variable cost, and the basis for cost variation (i.e., participant counts).
  - b. Explain how this program cost was estimated, including all assumptions, estimates, and calculations.
  
13. Refer to Attachment 2 provided in response to AG-DR-01-021, and the line item "Communications Vendor."
  - a. Describe this program cost and its cost components. Identify each cost component as a fixed costs or a variable cost, and the basis for cost variation (i.e., participant counts).
  - b. Explain how this program cost was estimated, including all assumptions, estimates, and calculations.
  - c. Explain how this cost will fall with increases in PTR program participation on a per-offer or per-participant basis.
  
14. Refer to Attachment 2 provided in response to AG-DR-01-021, and the line item "NOPROD."
  - a. Describe this program cost and its cost components. Identify each cost component as a fixed costs or a variable cost, and the basis for cost variation (i.e., participant counts).
  - b. Explain what the 11% value in cell B32 represents, and how it was determined.
  
15. Refer to Attachment 2 provided in response to AG-DR-01-021, and the line item "Net Participants." Explain how the value of 2,005 participants was determined.
  
16. Refer to the Company's response to AG-DR-02-015 immediately above. Refer also to Appendix F of the Company's Application in this proceeding, "Peak Time Credit EM&V Companion Report," page 6, which describes one of the cost-effectiveness test scenarios as "Non-pilot Forward Looking PTR program." This description implies a

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broad roll-out of PTR to all DEK residential customers. Given the relative ease with which DEK was able to recruit participants to the pilot, the OAG would expect high participation in a broader roll-out of PTR. Indeed, in research readily discoverable via internet search, the OAG found research indicating that PTR participation of between 10% and 28% of offers can be expected.<sup>1</sup>

- a. Please explain how participation by 2,005 customers, equating to approximately 1.5% of DEK's residential customer count of 130,000, is consistent with expected participation rates for a "non-pilot forward looking PTR program."
- b. Please explain why DEK chose such a low participation rate to calculate the Total Resource Cost test value for "non-pilot forward looking PTR program."

17. 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.

18. Refer to DEK's advanced metering infrastructure (AMI) generally. The OAG notes that since entering into the Stipulation with the OAG in the Company's CPCN for AMI (Kentucky PSC Case No. 2016-00152), the Company has not submitted any time-varying rate tariff option (which are enabled through AMI technology) for residential customers.

- a. Provide any research the Company has completed regarding residential customer interest in time-varying rates.
- b. If the Company has not conducted any research regarding residential customer interest in time-varying rates, please explain why not.
- c. Explain the Company's apparent disinterest in understanding residential customer interest in time-varying rates.

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<sup>1</sup> Todd A, Cappers P, and Goldman C. Residential Customer Enrollment in Time-based Rate and Enabling Technology Programs. Lawrence Berkeley National Laboratory Report LBNL-6247E. Page 31, "Recruitment Rate" for rates designed with "CPR" (critical peak rebate). June, 2013.