

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF DUKE ENERGY )  
KENTUCKY, INC. FOR (1) AN ADJUSTMENT OF )  
ELECTRIC RATES; (2) APPROVAL OF NEW ) CASE NO. 2022-00372  
TARIFFS; (3) APPROVAL OF ACCOUNTING )  
PRACTICES TO ESTABLISH REGULATORY )  
ASSETS AND LIABILITIES; AND (4) ALL OTHER )  
REQUIRED APPROVALS AND RELIEF )

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**THE ATTORNEY GENERAL’S RESPONSE TO THE COMMISSION STAFF’S  
FIRST REQUEST FOR INFORMATION**

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Comes now the intervenor, the Attorney General of the Commonwealth of Kentucky, through his Office of Rate Intervention (“Attorney General”), and submits the following response to the Commission Staff’s First Request for Information in the above-styled matter.

Respectfully submitted,

DANIEL J. CAMERON  
ATTORNEY GENERAL

*Angela M. Goad*

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**Certificate of Service and Filing**

Pursuant to the Commission's Orders and in accord with all other applicable law, Counsel certifies that the foregoing electronic filing was transmitted to the Commission on April 7, 2023, and there are currently no parties that the Commission has excused from participation by electronic means in this proceeding.

This 7<sup>th</sup> day of April, 2023,



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Assistant Attorney General

WITNESS RESPONSIBLE:  
LANE KOLLEN

QUESTION NO. 1  
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Refer to the Direct Testimony of Lane Kollen, page 59, line 13, through page 60, line 3. Mr. Kollen recommends two alternatives for the Make Ready Credit (MRC) program. For the alternatives Mr. Kollen suggested, explain how the programs could be structured to recover costs exclusively from participating customers.

RESPONSE:

The MRC program could be structured to recover costs exclusively from participating customers in the same manner that the Company proposes to recover the costs of the EVSE program whether the MRC program is a standalone program or is combined with the EVSE program. However, if the MRC program is combined into the EVSE program, then the tariff could reflect separate charges for each program within the tariff recovery formula.

**AFFIDAVIT**

STATE OF GEORGIA            )

COUNTY OF FULTON         )

LANE KOLLEN, being duly sworn, deposes and states: that the attached is his sworn testimony and that the statements contained are true and correct to the best of his knowledge, information and belief.



Lane Kollen

Sworn to and subscribed before me on this  
7th day of April 2023.



Notary Public

