


VERIFICATION

STATE OF OHIO)
) SS:
COUNTY OF HAMILTON)

The undersigned, Abigail Kappesser, Supervisor RS Business Operations, 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.


Abigail Kappesser, Affiant

Subscribed and sworn to before me by Abigail Kappesser, on this 21 day of March, 2023.


NOTARY PUBLIC

My Commission Expires: July 8, 2027



EMILIE SUNDERMAN
Notary Public
State of Ohio
My Comm. Expires
July 8, 2027

VERIFICATION

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

The undersigned, Beth White, GM Customer Billing, 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.

Beth White

Beth White, Affiant

Subscribed and sworn to before me by Beth White on this 24th day of March, 2023.

Dartan C Waters

NOTARY PUBLIC

My Commission Expires: 10/20/2025

Dartan C Waters
NOTARY PUBLIC
Cabarrus County, NC
My Commission Expires October 20, 2025

KyPSC Case No. 2022-00391
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Duke Energy Kentucky
Case No. 2022-00391
STAFF Second Set of Data Requests
Date Received: March 13, 2023

STAFF-DR-02-001

REQUEST:

Refer to Duke Kentucky's response to Commission Staff's First Request for Information (Staff's First Requests), Item 1, in which Duke Kentucky states that the usage graph was removed from the bills of eight Kentucky customers.

- a. Confirm that the usage graph was not removed from any other Duke Kentucky customer's bill.
- b. Explain what caused the usage graph to be removed from the bills of the eight (8) customers.
- c. Explain when Duke Kentucky discovered that the usage graph had been removed from the bills of the eight customers and identify the steps Duke Kentucky took to rectify the situation.

RESPONSE:

- a. A total of 8 Kentucky customers were impacted by the missing usage graph.
- b. There was an issue in our legacy system where the bill format did not display a usage graph on the bill when there were 11 or more consecutive months of zero usage billed. Mr. Oka was a net generator, often delivering more kwh to the grid than was consumed. As a result, the associated carryforward balance was applied in future months to reduce the usage billed to zero. It has been confirmed that the new Customer Connect system displays the graph on bills even when all 13 months displayed in the graph have billed for zero usage.

c. The missing usage graph for the 8 accounts was discovered upon researching the request as part of the Commission Staff's First Request for Information. The issue was rectified in April 2022 as part of the migration to the new CIS. The impacted customers' monthly bills began displaying the missing graphs on their first invoice following migration.

PERSON RESPONSIBLE: Abigail Kappesser
Beth White

Duke Energy Kentucky
Case No. 2022-00391
STAFF Second Set of Data Requests
Date Received: March 13, 2023

STAFF-DR-02-002

REQUEST:

Refer to Duke Kentucky's response to Staff's First Request, Item 2, in which Duke Kentucky indicated that the error involving kwh carryforward balances was discovered on November 14, 2022, and corrected on December 9, 2022. Also refer to Joseph J. Oka's Supplemental Information to Complaint filed on July 27, 2022, in Case No. 2021-00324,¹ in which Mr. Oka indicates that he had contacted Duke Kentucky about his kwh carryforward balance being zeroed out. Also refer to Duke Kentucky's response to Commission Staff's Fourth Request for Information in Case No. 2021-00324, Item 2, which was filed on October 7, 2022, and contained copies of Mr. Oka's bill for August and September 2022 which showed that Mr. Oka's kwh carryforward balance had been corrected. Explain the discrepancies between the response in the instant proceeding and the information provided in Case No. 2021-00324 regarding the kwh carryforward balance error.

RESPONSE:

When the Company responded to STAFF-DR-02-001 the response was based on reports run out of the IT issue tracking system, which indicated an entry on November 14, 2022 with a corrected date of December 9, 2022.

Regarding Mr. Oka's account correction in August 2022, the correction was completed manually by the Company. The manual correction did not extend to the seven

¹ Case No. 2021-00324, *Joseph J. Oka v. Duke Energy Kentucky, Inc.*

additional accounts, as they were not known to have the kWh carryforward balance issue. The additional accounts were discovered in November 2022 when the Company was preparing the yearly Duke Energy Kentucky net metering report for the Kentucky PSC as stated in STAFF-DR-01-003. The net metering report preparer noticed that residential accounts with negative usage had excess carryover banks of zero and reported this finding to the technical team. The Company deployed the correction in December 2022 that prevented the credit bank from resetting for Kentucky customers in the future.

PERSON RESPONSIBLE: Abigail Kappesser
Beth White