

**COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION**

**ELECTRONIC APPLICATION OF)
DUKE ENERGY KENTUCKY, INC.)
TO AMEND ITS DEMAND SIDE)
MANAGEMENT PROGRAMS)**

Case No. 2025-00272

ATTORNEY GENERAL'S COMMENT

Comes now, the Attorney General of the Commonwealth of Kentucky, through his Office of Rate Intervention, and provides this public comment related to the demand side management programs proposed here.

With this filing, Duke Energy Kentucky, Inc. (“Duke”) proposes a “new” program, the Energy Efficiency in Education Program (“Program”). Duke proposes to conduct an “education component” which it describes as a “theatrical performance or informational seminar,” “centered around [energy efficiency]” at public and private schools in the service territory to students K-12.¹ “Attendees” are then offered an energy efficiency “kit” offering guidance on energy efficiency measures for the home.² For this, Duke proposes to pay a vendor \$113,962 annually, which will come from ratepayer funds.³ Duke notes that it previously offered a similar program, which the Commission ordered to be terminated in 2018.⁴

¹ Application at 8.

² Application at 8.

³ Application at 9.

⁴ Application at 7-8.

The Attorney General is skeptical of the benefit of this additional program at a time when utility costs are increasingly unaffordable. The Commission was correct in eliminating the program in 2018 and circumstances have not changed to justify restarting the program.⁵ Ratepayers have no additional bandwidth to absorb unnecessary costs now than they did then.

The Commission should deny the reinstitution of this terminated program.

Respectfully submitted,

RUSSELL COLEMAN
ATTORNEY GENERAL



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⁵ See Order of September 13, 2018 in Case No. 2017-00427.

Certificate of Service and Filing

Pursuant to the Commission's Order dated March 17, 2020 in Case No. 2020-00085, and in accord with all other applicable law, Counsel certifies that, on September 22, 2025, a copy of the forgoing was served on the individuals on the e-service list.

this 22nd day of September, 2025.

A handwritten signature in blue ink, appearing to read "J. Michael New". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Assistant Attorney General