

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ANNUAL COST RECOVERY FILING FOR	)	
DEMAND SIDE MANAGEMENT BY DUKE	)	CASE NO.
ENERGY KENTUCKY, INC.	)	2008-00473

INITIAL DATA REQUEST OF COMMISSION STAFF TO  
DUKE ENERGY KENTUCKY, INC.

Duke Energy Kentucky, Inc. ("Duke Kentucky"), pursuant to 807 KAR 5:001, is to file with the Commission the original and 8 copies of the following information, with a copy to all parties of record. The information requested herein is due 10 days after the date of this Order. Responses to requests for information shall be appropriately bound, tabbed and indexed. Each response shall include the name of the witness responsible for responding to the questions related to the information provided.

Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the 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.

Duke Kentucky shall make timely amendment to any prior response if it obtains information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which Duke Kentucky fails or refuses to furnish all or part of the requested information, it shall

provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations.

1. Refer to Section B on page 11 of the application. Clarify whether GoodCents Solutions will continue to play a role in Duke Energy's DSM program after the transition to Wisconsin Energy Conservation Corporation and Thermo-Scan Inspections. If yes, how will the three entities work together to support Duke Kentucky's DSM programs?

2. Refer to Appendix I of Duke Kentucky's application, page 1 of 6.

a. Column 13, "(Over)/Under Collection, Gas" shows a total under-collection of \$2,724,504 for residential programs. Explain how an under-collection of this magnitude occurred. Include all workpapers, spreadsheets, calculations, etc. necessary to support the explanation.

b. Column 9, "(Over)/Under Collection" for commercial programs references footnote E, which reads "Column 4 + Column 5 + Column 6 + Column 7 -- Column 8." However, the total over-collection amount for high efficiency programs of (\$925,623) in Column 9 does not comport with footnote E because Column 6 "Shared Savings" is not included in the calculation of that total amount. Clarify whether there is

an error in the footnote or the calculation and provide a revised Appendix I as well as revised versions of any other affected appendices.

3. Refer to Appendix I of Duke Kentucky's application, page 1 of 6. Column 4, "Program Expenditures" includes amounts that total \$2,148,273 for all programs from July, 2007 through June, 2008. This amount equals approximately 60 percent of the projected program costs of \$3,592,181 shown in Column 1.

a. Explain why actual program expenditures were so much less than the projected program costs for the 12 months ended June 2008.

b. Column 1 on page 2 of 6 of Appendix I shows the projected costs for the 2009 program year. Given that actual expenditures for the prior program year equaled only 60 percent of the budget, explain why the projected costs for the new program year are at the same level, \$3,592,181, as in the prior program year. Identify and describe any changes Duke Kentucky intends to implement to increase actual expenditures.

4. Refer to Appendix I of Duke Kentucky's application, page 6 of 6. Footnote A references Appendix J, page 1; however, there is no Appendix J in the application. Provide the referenced appendix or other revision needed to rectify this inconsistency.

5. Refer to Appendix I of Duke Kentucky's application, page 6 of 6. The heading for the section at the bottom one-third of the page refers to Appendix K, page 1 of 6; however, there is no Appendix K in the application. Provide the referenced appendix or other revision needed to rectify this inconsistency.



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Jeff Derouen  
Executive Director  
Public Service Commission  
P.O. Box 615  
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DATED: FEBRUARY 27, 2009

cc: Parties of Record

Case No. 2008-00473

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