

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

DUKE ENERGY KENTUCKY, INC.'S ANNUAL	)	CASE NO.
COST RECOVERY FILING FOR DEMAND-SIDE	)	2015-00368
MANAGEMENT	)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION  
TO DUKE ENERGY KENTUCKY, INC.

Duke Energy Kentucky, Inc. ("Duke Kentucky"), pursuant to 807 KAR 5:001, is to file with the Commission an original in paper medium and an electronic version of the following information. The information requested herein is due on or before January 29, 2016. Responses to requests for information in paper medium 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. When filing a document containing personal information, Duke Kentucky shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to the Application, page 7, the table in numbered paragraph 17.
  - a. Provide similar information for the electric portion for July 2015 through December 2015.
  - b. Provide similar information for the natural gas portion of the demand-side management (“DSM”) programs for July 2014 through June 2015.
  - c. Provide similar information for the natural gas portion of the DSM programs for July 2015 through December 2015.
2. Refer to Case No. 2015-00277,<sup>1</sup> Application, Exhibit A, Appendix A, and the current Application, Appendix A. In those instances where the cost-effectiveness test results change by 50 percent or more in the current proceeding, explain why the

---

<sup>1</sup> Case No. 2015-00277, *Application of Duke Energy Kentucky, Inc. to Amend Its Demand Side Management Programs*, filed August 17, 2015.

cost-effectiveness test results changed as compared to the results in Case No. 2015-00277.<sup>2</sup>

3. Refer to the Application, pages 21-22, numbered paragraph 50. Provide the analysis that supports the long-term program effectiveness at reducing energy usage and arrearages.

4. Refer to the Application, page 24, numbered paragraph 57. Explain the statistical sampling requirements for PJM Interconnections and explain how Duke's studies comply with these PJM requirements.

5. Refer to the Application, page 25, numbered paragraph 60. Explain how an increase in demand results in lower prices.

6. Refer to the Application, Exhibit B, page 1 of 7. Refer to column (1), the Projected Program Costs. For the Home Energy Assistance Pilot Program, the projected program costs are \$252,236. According to PSC Case No. 2013-00395,<sup>3</sup> Application, Appendix B, page 3 of 6, the projected costs for the Home Energy Assistance Pilot Program are \$250,556. Explain this difference.

7. Refer to the Application, Exhibit B, page 2 of 7. Provide the source of the 2016–2017 projected program costs, lost revenue, and shared savings.

8. Refer to the Application, Appendix B, page 5 of 7.

a. Explain whether the Distribution Level Rates Total DS, DP, DT, GS-FL, EH & SP factor should be \$0.002757 or \$0.002758, since Distribution Level Rates

---

<sup>2</sup> *Id.*

<sup>3</sup> Case No. 2013-00395, *Duke Energy Kentucky, Inc's Annual Cost Recovery Filing for Demand Side Management* (Ky. PSC Mar. 28, 2014).

Part A DS, DP, DT, GS-FL, EH & SP factor is \$0.002709 and Transmission Level Rates & Distribution Level Rates Part B TT factor is \$.000049.

b. Provide the current average of the three-month commercial paper rate and the source of this interest rate.

c. Provide the source of the number of residential and gas customers.

9. Refer to the Application, Exhibit B. Provide a copy of this exhibit in Excel spreadsheet format with all formulas intact and unprotected, and with all columns and rows accessible.



---

Jeff Derouen  
Executive Director  
Public Service Commission  
P.O. Box 615  
Frankfort, KY 40602

DATED ~~JAN 14 2016~~

cc: Parties of Record

\*Rocco O D'Ascenzo  
Duke Energy Kentucky, Inc.  
139 East Fourth Street  
P. O. Box 960  
Cincinnati, OH 45201

\*Duke Energy Kentucky, Inc.  
139 East Fourth Street  
Cincinnati, OH 45202

\*Adele Frisch  
Duke Energy Kentucky, Inc.  
139 East Fourth Street  
P. O. Box 960  
Cincinnati, OH 45201

\*E. Minna Rolfes-Adkins  
Paralegal  
Duke Energy Kentucky, Inc.  
139 East Fourth Street  
P. O. Box 960  
Cincinnati, OH 45201