

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

| | | |
|----------------------------------|---|------------|
| ELECTRONIC APPLICATION OF |) | |
| DUKE ENERGY KENTUCKY, INC. TO |) | CASE NO. |
| AMEND ITS DEMAND SIDE MANAGEMENT |) | 2016-00289 |
| PROGRAMS |) | |

COMMISSION STAFF'S SECOND 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 the original and six copies in paper medium and an electronic version of the following information. The information requested herein is due on or before November 7, 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 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 should 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 paper 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 Duke Kentucky's response to Staff's First Request for Information ("Staff's First Request"), Item 1.a.
 - a. Provide the estimated costs incurred from those participants who are not Duke Kentucky customers.
 - b. Explain whether Duke Kentucky adjusted the estimated program costs to account for these costs.
 - c. If the answer to 1.b. is no, explain whether Duke Kentucky will adjust the actual program costs when determining the over-/under-collection to account for these costs.

d. Explain how Duke Kentucky determined “customer shopping patterns.”

e. Explain how offering the program in conjunction with Duke Energy Ohio will minimize non-Duke Kentucky customers’ participation.

2. Refer to Duke Kentucky’s response to Staff’s First Request, Item 5. Explain whether the statement “Customers who select the switch will not see any energy savings on their bill” refers to general energy savings from thermostat control or energy savings from the Power Manager event.

3. Refer to Duke Kentucky’s response to Staff’s First Request, Item 11.d. Duke Kentucky responded that it does not provide real-time feedback on customer curtailment performance. Explain how the participant is assured that his or her energy curtailment is sufficient to avoid a penalty.

4. Refer to Duke Kentucky’s response to Staff’s First Request, Item 11.e. Explain how PJM determines noncompliance charges and penalties for an event and how any penalties assessed from PJM are assigned to customers that did not meet their curtailment commitment.

5. Refer to Duke Kentucky’s response to Staff’s First Request, Item 12.

a. Provide a comparison of the rates of Duke Ohio and Duke Kentucky and the dollar amount of savings possible for participating customers applying the two different sets of rate schedules.

b. Considering the difference in dollar savings potential caused by the difference in the two utilities’ rates, state whether Duke Ohio results are relevant in evaluating the Duke Kentucky programs.



Talina R. Mathews
Executive Director
Public Service Commission
P.O. Box 615
Frankfort, KY 40602

DATED OCT 24 2016

cc: Parties of Record

*Adele Frisch
Duke Energy Kentucky, Inc.
139 East Fourth Street
Cincinnati, OH 45201

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

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

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

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