

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF DUKE ENERGY)	
KENTUCKY, INC. FOR AUTHORITY TO 1) ADJUST)	CASE NO.
NATURAL GAS RATES 2) APPROVAL OF A)	2018-00261
DECOUPLING MECHANISM 3) APPROVAL OF)	
NEW TARIFFS 4) AND FOR ALL OTHER)	
REQUIRED APPROVALS, WAIVERS, AND RELIEF)	

COMMISSION STAFF'S SECOND POST-HEARING 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 in paper medium and an electronic version of the following information. The information requested herein is due within seven days of the entry of this Request for Information. Responses to requests for information in paper medium shall be appropriately bound, tabbed, and indexed. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

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 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 Commission Staff's Post-Hearing Request for Information (Commission Staff's Post-Hearing Request), Item 3, in which Duke Kentucky's answer was inadequate and nonresponsive. As originally requested, provide a breakdown of expenses, including administrative costs, for the Home Energy Assistance (HEA) Program in 2018.

2. Refer to Duke Kentucky's response to Commission Staff's Post-Hearing Request, Item 4.

- a. Explain why Duke Kentucky believes that the 15 percent fee that the Northern Kentucky Community Action Commission (NKCAC) charges to administer the

HEA Program is reasonable, and provide cost justification with supporting detailed program costs of the same.

b. Notwithstanding a. above, explain in full detail why Duke Kentucky finds it reasonable to pay NKCAC 15 percent to administer the HEA Program instead of 10 percent, which is the standard for other Community Action Commission agencies that administer much larger funded programs.

c. Explain whether Duke Kentucky has ever reviewed for reasonableness or attempted to renegotiate the 15 percent fee that NKCAC charges to administer the HEA Program to a lower amount. If not, explain in detail why not.

3. Refer to Duke Kentucky's response to Commission Staff's Post-Hearing Request, Item 17, in which Duke Kentucky states that headcount data is not used in determining labor budgets, but instead labor budgets are determined based on salary dollars. Explain in full detail how Duke Kentucky determines labor budgets based on salary dollars.

4. Provide the individual names of all NKCAC employees and volunteer staff that administer Duke Kentucky's HEA Program.

5. Refer to Duke Kentucky's response to Commission Staff's Post-Hearing Request, Item 5, in which Duke Kentucky states that NKCAC does not typically exhaust the annual HEA Program funding, and regularly has a funding balance from year to year.

a. Explain in detail why NKCAC has not exhausted the annual HEA Program funds for any of the past five years, from 2014–2018, and the amount of unspent funds for each of those years.

b. Identify all of the methods that both Duke Kentucky and NKCAC promote the HEA Program to Duke Kentucky's customers and the media used for that promotion.

6. Identify what improvements could be made to bring more awareness of the HEA Program to Duke Kentucky's customers.

7. Provide the 2018 and 2019 budgets for NKCAC. Include with the 2018 budget a side-by-side comparison of both budgeted and actual expenses.

8. Provide copies of all agreements/contracts that exist between Duke Kentucky and NKCAC related to the HEA Program.

9. Provide all tariff pages that have been revised since Duke Kentucky initially filed the pending application, and ensure that the tariff pages reflect the most current effective revisions. Examples of tariff pages that have been revised include but are not limited to: Rider GCAT, the Gas Cost Adjustment portion of monthly rates, and Rider DSMR.



Gwen R. Pinson
Executive Director
Public Service Commission
P.O. Box 615
Frankfort, KY 40602

DATED **MAR 01 2019**

cc: Parties of Record

*L Allyson Honaker
Goss Samford, PLLC
2365 Harrodsburg Road, Suite B325
Lexington, KENTUCKY 40504

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

*David S Samford
Goss Samford, PLLC
2365 Harrodsburg Road, Suite B325
Lexington, KENTUCKY 40504

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

*Debbie Gates
Duke Energy Kentucky, Inc.
139 East Fourth Street
Cincinnati, OH 45201

*William Don Wathern, Jr.
Director Rates & Reg. Strategy
Duke Energy Kentucky, Inc.
139 East Fourth Street
Cincinnati, OH 45201

*Kent Chandler
Assistant Attorney General
Office of the Attorney General Office of Rate
700 Capitol Avenue
Suite 20
Frankfort, KENTUCKY 40601-8204

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

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