## COMMONWEALTH OF KENTUCKY

## BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF DUKE ENERGY ) CASE NO. KENTUCKY, INC. TO AMEND ITS DEMAND SIDE ) 2019-00277 MANAGEMENT PROGRAMS

## COMMISSION STAFF'S INITIAL 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 on or before October 25, 2019. 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 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 amendments 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 filling 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.

- Refer to the application, paragraph 6. Provide the comments about Duke Kentucky's proposed changes received from the Residential Collaborative and the Commercial and Industrial Collaborative.
  - 2. Refer to the application, paragraph 7.
    - a. Provide the annual projected purchases for each additional product.
    - b. Provide cost-effective scores for each additional product.
  - 3. Refer to the application, paragraph 8.
- a. Regarding the My Home Energy Report (MyHER) Program, provide the number of households that have opted in.
- b. Provide an explanation for Duke Kentucky's planned expansion of the MyHER Program.

- c. Explain how an expansion of the scope of the MyHER Program will reduce the budget.
  - 4. Refer to the application, paragraph 9.
- a. Provide all reports and studies that support the addition or modification of the additional 38 Food Service technologies.
- b. For each Food Service technology, provide the cost-effectiveness test result.
- 5. Refer to the application, paragraph 11. Provide the identity of the Evaluation, Measurement and Verification (EM&V) vendor and the process in which they were selected to perform the analysis of the Peak Time Rebate (PTR) pilot program.
  - 6. Refer to the application, paragraph 13.
    - a. Provide support of the 33 cents/kWh credit.
- b. Duke Kentucky states that credits will be calculated and applied no later than the second billing month following the Critical Peak Event (CPE). Explain why credits will not be applied during the billing month the CPE occurred or in the first billing month following the CPE.
  - 7. Refer to the application, paragraph 17.
- a. Explain in detail the criteria for a customer to be eligible to participate in the PTR Pilot program.
- b. Explain whether a Wi-Fi enabled thermostat is necessary in order for a customer to participate in the PTR Pilot program.
  - 8. Refer to the application, paragraph 19.

- a. Explain how Duke Kentucky expects to fund the PTR Pilot program.
- b. Explain in detail what billing system revisions and other preparations are expected to be needed.
  - 9. Refer to the application, paragraph 21.
- a. Explain why a reduction of 0.3 kW per hour per participant is considered.
- b. Explain why the cost-effectiveness scores are based on a three-year pilot instead of a two-year pilot.
  - c. Provide the cost-effectiveness scores based on a two-year pilot.
- 10. Refer to the application, Appendix A. Provide the supporting calculations for the Cost Effectiveness Test Results in Excel spreadsheet format, with formulas unprotected and all rows and columns fully accessible.
  - 11. Refer to the application, Appendix B.
- a. Provide in Excel spreadsheet format with all formulas unprotected and all rows and columns fully accessible.
- b. Provide a revised Appendix B with the gas allocations as ordered in
   Case No. 2018-00370.<sup>1</sup>
- c. Refer to page 2 of 6. Also, refer to Case No. 2018-00370, AppendixB, page 2. Confirm that the lowered estimated costs of the Residential Smart Saver

<sup>&</sup>lt;sup>1</sup> Case No. 2018-00370, Electronic Annual Cost Recovery Filing for Demand Side Management by Duke Energy Kentucky, Inc. (Ky. PSC Oct. 2, 2019).

residential program are due to the decrease in the costs associated with ending the free LED Program.

12. Referring to the proposed PTR Program, if any affiliates of Duke Energy, Inc., offer a similar program, provide a comparison of the program to Duke Kentucky's proposed program, load reduction results of the programs, and any studies evaluating the programs.

Gwen R. Pinson
Executive Director

**Public Service Commission** 

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DATED OCT 1 0 2019

cc: Parties of Record

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