COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC INVESTIGATION OF HOME) ENERGY ASSISTANCE PROGRAMS OFFERED) BY INVESTOR-OWNED UTILITIES PURSUANT) TO KRS 278.285(4))

CASE NO. 2019-00366

COMMISSION STAFF'S THIRD 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 an electronic version of the following information. The information requested herein is due on February 14, 2020. 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 Community Action of Kentucky, Inc.'s (CAK) response to Staff's First Request for Information, Attachment A, which contains CAK's recommendations for revisions to HEA programs. If the Commission were to implement each recommendation, explain how implementing the recommendation would impact your utility, addressing in detail any perceived benefits, adverse consequences, or impediments to implementing the recommendations.

2. Identify any other bill payment assistance programs, other than those listed on the attached spreadsheet, that your utility funds either through customer donations or shareholder funds. Describe all funding sources for the program(s); state whether the program is a crisis program or recurring benefit program; provide the eligibility criteria; and state whether any fees are paid to administer the program(s).

Case No. 2019-00366

-2-

3. Refer to Duke Kentucky's response to the Attorney General's First Request for Information, Item 3. Explain in detail Duke Kentucky's participation with the WinterCare program, and what the program is.

4. Explain whether HEA benefits are prioritized or provided before or after other available benefits, such as LIHEAP, donations, or other programs aimed at reducing consumers' energy burdens.

5. Refer to Duke Kentucky's response to the Attorney General's First Request for Information, Item 4.

a. Provide representative bill inserts, emails, website landing pages and banners used by Duke Kentucky since January 1, 2019, for purposes of notifying customers of the availability of the WinterCare Program.

b. Explain why Duke Kentucky's HEA program is administered under, and is part of, the WinterCare program.

c. Provide the material relevant to HEA that were "included as part of the call center's winter refresher training."

6. For each HEA program, provide the following information for each of the last five full program years:

a. The average monthly bill for all residential customers for each month from November to March.

b. The average monthly bill for residential customers receiving HEA benefits for each month from November to March.

Case No. 2019-00366

-3-

c. The average monthly bill for residential customers receiving LIHEAP benefits for each month from November to March.

(X wen R. Pienson

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

DATED _____ JAN 3 1 2020

cc: Parties of Record

*Honorable Allyson K Sturgeon Senior Corporate Attorney LG&E and KU Energy LLC 220 West Main Street Louisville, KENTUCKY 40202

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

*Brooke Wancheck Asst. Counsel Columbia Gas of Kentucky, Inc. 2001 Mercer Road P. O. Box 14241 Lexington, KY 40512-4241

*Cheryl A MacDonald Columbia Gas of Kentucky, Inc. 290 W. Nationwide Blvd. Columbus, OHIO 43215

*Christen M Blend American Electric Power Service Corporation 1 Riverside Plaza, 29th Floor Post Office Box 16631 Columbus, OHIO 43216

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

*Debbie Gates Duke Energy Kentucky, Inc. 139 East Fourth Street Cincinnati, OH 45201 *Kentucky-American Water Company Kentucky-American Water Company 2300 Richmond Road Lexington, KY 40502

*Hector Garcia American Electric Power Service Corporation 1 Riverside Plaza, 29th Floor Post Office Box 16631 Columbus, OHIO 43216

*John B Brown Chief Financial Officer Delta Natural Gas Company, Inc. 3617 Lexington Road Winchester, KY 40391

*Jenny Lowery Delta Natural Gas Company, Inc. 3617 Lexington Road Winchester, KY 40391

*Judy M Cooper Director, Regulatory Services Columbia Gas of Kentucky, Inc. 2001 Mercer Road P. O. Box 14241 Lexington, KY 40512-4241

*Justin M. McNeil Office of the Attorney General Office of Rate 700 Capitol Avenue Suite 20 Frankfort, KENTUCKY 40601-8204

*Kentucky Power Company Kentucky Power Company 855 Central Avenue, Suite 200 Ashland, KY 41101 *Karen Greenwell Attorney Wyatt, Tarrant & Combs, LLP 250 West Main Street Suite 1600 Lexington, KENTUCKY 40507-1746

*Kathie Mcdonald-McClure Attorney Wyatt, Tarrant & Combs, LLP 2600 PNC Plaza 500 West Jefferson Street Louisville, KENTUCKY 40202

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

*Lindsey Ingram STOLL KEENON OGDEN PLLC 300 West Vine Street Suite 2100 Lexington, KENTUCKY 40507-1801

*Lawrence W Cook Assistant Attorney General Office of the Attorney General Office of Rate 700 Capitol Avenue Suite 20 Frankfort, KENTUCKY 40601-8204

*Minna Sunderman Duke Energy Kentucky, Inc. 139 East Fourth Street Cincinnati, OH 45201

*Monica Braun STOLL KEENON OGDEN PLLC 300 West Vine Street Suite 2100 Lexington, KENTUCKY 40507-1801 *Honorable Mark R Overstreet Attorney at Law Stites & Harbison 421 West Main Street P. O. Box 634 Frankfort, KENTUCKY 40602-0634

*Columbia Gas of Kentucky, Inc. Columbia Gas of Kentucky, Inc. 290 W Nationwide Blvd Columbus, OH 43215

*Delta Natural Gas Company, Inc. Delta Natural Gas Company, Inc. 3617 Lexington Road Winchester, KY 40391

*Rick E Lovekamp Manager - Regulatory Affairs LG&E and KU Energy LLC 220 West Main Street Louisville, KENTUCKY 40202

*Robert Conroy LG&E and KU Energy LLC 220 West Main Street Louisville, KENTUCKY 40202

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

*Roger McCann Executive Director Community Action Kentucky 101 Burch Court Frankfort, KENTUCKY 40601 *Sara Judd LG&E and KU Energy LLC 220 West Main Street Louisville, KENTUCKY 40202

*Sidney Gates Community Action Kentucky 101 Burch Court Frankfort, KENTUCKY 40601

*Kentucky Utilities Company Kentucky Utilities Company 220 W. Main Street P. O. Box 32010 Louisville, KY 40232-2010

*Louisville Gas and Electric Company Louisville Gas and Electric Company 220 W. Main Street P. O. Box 32010 Louisville, KY 40232-2010