

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC ANNUAL COST RECOVERY	)	CASE NO.
FILING FOR DEMAND SIDE MANAGEMENT	)	2020-00371
BY DUKE ENERGY KENTUCKY, INC.	)	

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 electronic version of the following information. The information requested herein is due on January 11, 2021. The Commission directs Duke Kentucky to the Commission's March 16, 2020 and March 24, 2020 Orders in Case No. 2020-00085<sup>1</sup> regarding filings with the Commission. The Commission expects the original documents to be filed with the Commission within 30 days of the lifting of the current state of emergency. 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

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<sup>1</sup> Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC Mar. 16, 2020), Order at 5–6. Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC Mar. 24, 2020), Order at 1–3.

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 Duke Kentucky obtains information that indicates 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, Duke Kentucky 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 the Application, paragraph 15. For each program listed, explain whether the program has been reinstated since suspending due to the COVID-19 pandemic and what steps Duke Kentucky has taken to ensure COVID-19 protocols are in place.

2. Refer to the Application, paragraph 16, Summary of Load Impacts, July 2019-June 2020, and to Case No. 2019-00406,<sup>2</sup> Application, page 6, Summary of Load Impacts July 2018–June 2019.

a. For the Residential Programs,

(1) Explain what contributed to the increase in energy, or kWh, impacts.

(2) Explain what contributed to the decrease in demand, or kW, impacts.

b. For the Non-Residential Programs,

(1) Explain what contributed to the decrease in energy, or kWh, impacts.

(2) Explain what contributed to the decrease in demand, or kW, impacts.

3. Refer to the Application, paragraph 29, which states that 6,117 bulbs were sold equaling 535 orders. Also, refer to Case No. 2019-00406, Application, paragraph 29, which states that 60,351 bulbs were sold equaling 5,458 orders. Explain in detail the reasons for the large decrease in bulb orders.

4. Refer to the Application, paragraph 37. The Save Energy and Water Kit (SEWK) program is budgeted at 8,304 measures; however, more than that have been issued. Explain whether Duke Kentucky plans to increase the number of budgeted measures.

5. Refer to the Application, paragraph 41.

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<sup>2</sup> Case No. 2019-00406, *Electronic Annual Cost Recovery Filing for Demand Side Management by Duke Energy Kentucky, Inc.* (Ky. PSC Nov. 15, 2019).

a. Explain in detail the meaning of “additional” in the last sentence in which Duke Kentucky states that 1,350 additional LED bulbs and 63 additional bathroom aerators were installed.

b. Explain whether there were other measures installed prior to those stated but within the fiscal year of July 1, 2019, through June 30, 2020.

6. Refer to the Application, paragraph 43. Duke Kentucky states that the program is structured so that homes needing the most work, and having the highest use per square foot, receives the most funding. Explain whether the tier structure gives households incentives to use more energy.

7. Refer to the Application, paragraph 47. The paragraph states in part, “a household could receive up to a total of \$500 towards their arrearage. This allows for approximately 200 homes to participate per year.”

a. Explain how many low-income customers there are in the Low Income Assistance program currently.

b. Explain how the 200 household program participation limit was derived.

c. Provide the forecasted number of low-income customers who will be qualified for this program in 2021. If this number is projected to be greater than 200, explain how Duke Kentucky selects 200 participants among these low-income customers.

8. Refer to the Application, paragraph 50. Explain whether Duke Kentucky has conducted any studies on the impact of suspending energy education classes due to COVID-19. Clearly explain the impact to show the importance of these classes to the customers and to Duke Kentucky.

9. Refer to the Application, paragraph 110. Provide any updates that Duke Kentucky may have regarding the cost-effective scores.

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

11. Refer to the Application, Appendix B, page 1 of 7. Also, refer to Case No. 2019-00406, Appendix B, page 2 of 7. For each of the following programs, explain why the projected program costs, lost revenues, and shared savings have changed:

- a. Low Income Neighborhood.
- b. Low Income Services.
- c. My Home Energy Report.
- d. Residential Energy Assessments.
- e. Residential Smart Saver.
- f. Power Manager.
- g. Small Business Energy Saver.
- h. Smart Saver Custom Smart Saver Prescriptive.
- i. PowerShare.

12. Explain whether Duke Kentucky has evaluated additional low-income DSM programs, and if so, provide a list of programs evaluated and reasons why Duke Kentucky has not submitted the programs for approval.

13. In Case No. 2019-00193,<sup>3</sup> Big Rivers Electric Cooperation (BREC) received

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<sup>3</sup> Case No. 2019-00193, *Demand-Side Management Filing of Big Rivers Electric Corporation to Implement a Low-Income Weatherization Support Program* (Ky. PSC Nov. 13, 2019).

approval to create a pilot DSM program to provide weatherization assistance to low-income residents for weatherization related measures that otherwise would not be completed due to limitations on other funding to correct residential health and safety issues. BREC's program provides \$1,500 to local Community Action Agencies that provide weatherization assistance to low-income residential customers of BREC's member distribution cooperatives pursuant to the Federal Department of Energy's Weatherization Assistance Program. Explain whether Duke Kentucky has evaluated such a program.



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DATED DEC 22 2020

cc: Parties of Record

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