

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELIZABETH L. EICHELBERGER)	
)	
COMPLAINANT)	
)	CASE NO.
V.)	2022-00289
)	
DUKE ENERGY KENTUCKY, INC.)	
)	
DEFENDANT)	

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 is due on December 14, 2022. The Commission directs Duke Kentucky to the Commission's July 22, 2021 Order in Case No. 2020-00085¹ regarding filings with the Commission. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the question to which the response is made, and 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

¹ Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC July 22, 2021), Order (in which the Commission mandated electronic filing, with exception to *pro se* formal complaints filed against utilities). *Pro se* parties in formal complaint cases may submit responses by U.S. Mail at P.O. Box 615, Frankfort, Kentucky 40602-0615, or by electronic email sent to PSCED@ky.gov. Responses filed using electronic email should include the case number in the subject line of the message and a read receipt to ensure the Commission received the message and documents.

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 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 and scanned 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 Answer and Motion to Dismiss (Duke Kentucky's Answer), paragraph 11(c) in which Duke Kentucky states its algorithm used January 2022 rates to calculate Ms. Eichelberger's budget bill amount. Also refer to Duke Kentucky's Answer, Confidential Exhibit A.

a. Explain why Duke Kentucky uses a single month's rates to calculate budget bill amounts and explain why that is reasonable given the volatility of certain rate components such as the Fuel Adjustment Clause (FAC).

b. Provide the detailed calculation used to arrive at the total gas and electric charges based on Ms. Eichelberger's historical usage. The response should include each individual rate (customer charge, per kwh charge, per ccf charge, FAC rate, etc.) used to calculate the budget bill amount.

2. Refer to Duke Kentucky's Answer, paragraph 12, in which Duke Kentucky states that Confidential Exhibit A depicts an approximation of the real-time calculation that was performed in January 2022. Explain whether Duke Kentucky maintains a record of the calculation of budget bill amounts. If so, explain why the specific calculation was not provided. If not, explain why Duke Kentucky does not maintain these records.

3. Refer to Duke Kentucky's Answer, paragraph 12, in which Duke Kentucky states that Ms. Eichelberger's budget bill amount was recently adjusted to \$212 in September 2022.

a. Explain what precipitated the revision to the budget bill amount in September 2022.

b. Provide the detailed calculation used to arrive at the new budget bill amount in the same detail requested in Item 1(b) above.



Linda C. Bridwell, PE
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Public Service Commission
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DATED NOV 29 2022

cc: Parties of Record

Case No. 2022-00289

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