COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

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ELECTRONIC ALLEGED FAILURE OF DUKE)	CASE NO.
ENERGY KENTUCKY, INC. TO COMPLY WITH)	2022-00391
KRS 278.466 AND 807 KAR 5:006, SECTION 7)	

COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION TO DUKE ENERGY KENTUCKY

Duke Energy Kentucky (Duke Kentucky), pursuant to 807 KAR 5:001E, is to file with the Commission an electronic version of the following information. The information requested is due on March 27, 2023. 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 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

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 ordered that for case filings made on and after March 16, 2020, filers are NOT required to file the original physical copies of the filings required by 807 KAR 5:001, Section 8).

response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Duke Energy shall make timely amendment to any prior response if Duke Energy obtains information that indicates the response was incorrect or incomplete when made or, though correct or complete when made, is now incorrect or incomplete in any material respect.

For any request to which Duke Energy fails or refuses to furnish all or part of the requested information, Duke Energy 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 Energy shall, in accordance with 807 KAR 5:001E, 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 First Request for Information (Staff's First Requests), Item 1, in which Duke Kentucky states that the usage graph was removed from the bills of eight Kentucky customers.
- a. Confirm that the usage graph was not removed from any other Duke Kentucky customer's bill.

- b. Explain what caused the usage graph to be removed from the bills of the eight (8) customers.
- c. Explain when Duke Kentucky discovered that the usage graph had been removed from the bills of the eight customers and identify the steps Duke Kentucky took to rectify the situation.
- 2. Refer to Duke Kentucky's response to Staff's First Request, Item 2, in which Duke Kentucky indicated that the error involving kwh carryforward balances was discovered on November 14, 2022, and corrected on December 9, 2022. Also refer to Joseph J. Oka's Supplemental Information to Complaint filed on July 27, 2022, in Case No. 2021-00324,² in which Mr. Oka indicates that he had contacted Duke Kentucky about his kwh carryforward balance being zeroed out. Also refer to Duke Kentucky's response to Commission Staff's Fourth Request for Information in Case No. 2021-00324, Item 2, which was filed on October 7, 2022, and contained copies of Mr. Oka's bill for August and September 2022 which showed that Mr. Oka's kwh carryforward balance had been corrected. Explain the discrepancies between the response in the instant proceeding and the information provided in Case No. 2021-00324 regarding the kwh carryforward balance error.

² Case No. 2021-00324, Joseph J. Oka v. Duke Energy Kentucky, Inc.

Linda C. Bridwell, PE
Executive Director
Public Service Commission

P.O. Box 615 Frankfort, KY 40602

DATED <u>MAR 13 2023</u>

cc: Parties of Record

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

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