

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC ANNUAL COST RECOVERY)	CASE NO.
FILING FOR DEMAND SIDE MANAGEMENT BY)	2022-00398
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 is due on December 26, 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 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 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 the Application, paragraph 41.
 - a. Explain how many low-income households are in Duke Kentucky's territory.
 - b. Explain Duke Kentucky's marketing strategy for its Low-Income Services Program and how that could increase the number of participants in the Low-Income Services program.

c. Explain whether Duke Kentucky has any intentions of modifying the criteria governing who qualifies for the Low-Income Services program. If so, provide details of any planned modifications.

d. Also refer to the Application, Appendix A, page 1 of 1. Historically, Low-Income programs typically have a TRC score under 1.0. Explain what actions Duke Kentucky could take to increase the TRC of the Low-income Services.

2. Refer to the Application, paragraphs 68 and 69, which discusses Duke Kentucky's goal for 2021 of retaining customers within the PowerShare® program. Explain whether Duke Kentucky will promote the PowerShare® Program to enroll new participants or if the goal continues to be only retaining the current customers involved in the program.

a. Explain why Duke Kentucky still includes the QuoteOption® program considering they have not had customer participation in the program since 2011.²

b. Explain what the cost impact of the QuoteOption® program is to the proposed PowerShare® program budget.

3. Refer to the Application, paragraph 74. Duke Kentucky states that it is still collaborating with organizations to promote the Neighborhood Energy Saver program but there is still hesitation from customers to allow technicians in their homes due to COVID-19. Explain whether there have been any changes to the program to overcome the hesitancy of customers.

² Case No. 2011-00448, *Application of Duke Energy Kentucky, Inc. for the Annual Cost Recovery Filing for Demand-Side Management* (filed Nov. 15, 2011).

4. Refer to the Application, Appendix B, page 2 of 7. Also refer to Case No. 2021-00313,³ Application, Appendix B, page 2 of 7, the 2021-2022 Projected Program Costs, Lost Revenues, and Shared Savings.

a. In Case No. 2021-00313, the proposed budget for 2021-2022 for the Low-Income Neighborhood Program, is \$535,375. In this case, the proposed budget is \$460,043. Explain why the budget has decreased for the 2023-2024 project year and provide supporting documentation for the decrease.

b. In Case No. 2021-00313, the proposed budget for 2021-2022 for the Low-Income Services Program, is \$674,774. In this case, the proposed budget is \$645,514. Explain why the budget has decreased for the 2023-2024 project year and provide supporting documentation for the decrease.

c. In Case No. 2021-00313, the proposed budget for 2021-2022 for the Residential Smart Saver® Program, is \$1,009,464. In this case, the proposed budget is \$520,248. Explain why the budget has decreased for the 2023-2024 project year and provide supporting documentation for the decrease.

d. In Case No. 2021-00313, the proposed budget for 2021-2022 for the Power Manager® Program, is \$702,947. In this case, the proposed budget is \$877,258. Explain why the budget has increased for the 2023-2024 project year and provide supporting documentation for the increase.

e. In Case No. 2021-00313, the proposed budget for 2021-2022 for the Smart Saver® Non-Residential Program, is \$1,443,115. In this case, the proposed budget

³ Case No. 2021-00313, *Electronic Application of Duke Energy Kentucky, Inc. to Amend Its Demand Side Management Programs* (filed Aug. 16, 2021).

is \$2,090,665. Explain why the budget has increased for the 2023-2024 project year and provide supporting documentation for the increase.

f. In Case No. 2021-00313, the proposed budget for 2021-2022 for the PowerShare® Program, is \$857,738. In this case, the proposed budget is \$1,063,284. Explain why the budget has increased for the 2023-2024 project year and provide supporting documentation for the increase.



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Public Service Commission
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DATED DEC 08 2022

cc: Parties of Record

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