

Mailing Address: 139 East Fourth Street 1303-Main Cincinnati, Ohio 45202

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Larisa.Vaysman@duke-energy.com Larisa M. Vaysman Senior Counsel

#### **VIA ELECTRONIC MAIL**

November 17, 2023

Ms. Linda Bridwell Executive Director Kentucky Public Service Commission 211 Sower Blvd Frankfort, KY 40601 RECEIVED NOV 17 2023

PUBLIC SERVICE COMMISSION

Re: <u>Case No. 2022-00289</u>

In the Matter of: Elizabeth L. Eichelberger v. Duke Energy Kentucky. Inc.

Dear Ms. Bridwell:

Duke Energy Kentucky, Inc. hereby submits its Responses to Staff's Fourth Request for Information. I certify that the electronic documents are true and accurate copies of the original documents.

Pursuant to the Commission's July 22, 2021 Order in Case No. 2020-00085, no paper copies of this filing will be made.

Respectfully submitted,

/s/Larisa M. Vaysman

Larisa M. Vaysman (98944) Senior Counsel Duke Energy Business Services LLC 139 East Fourth Street, 1303-Main Cincinnati, Ohio 45202

Phone: (513) 287-4010 Fax: (513) 370-5720

Email: larisa.vaysman@duke-energy.com *Counsel for Duke Energy Kentucky, Inc.* 

Enclosures: As stated

#### VERIFICATION

STATE OF INDIANA	)	
	)	SS:
COUNTY OF HENDRICKS	)	

The undersigned, Amber Kaufman, Consumer Affairs Specialist, being duly sworn, deposes and says that he has personal knowledge of the matters set forth in the foregoing data requests, and that the answers contained therein are true and correct to the best of his knowledge, information and belief.

Amber Kaufman, Affiant

Subscribed and sworn to before me by Amber Kaufman on this 31 day of October, 2023.

JAMIE L. STEVENS
Notary Public, State of Indiana
Hendricks County
Commission # NP0740939
My Commission Expires
May 03, 2030

NOTARY PUBLIC

My Commission Expires: 5/3/30

### **VERIFICATION**

STATE OF NORTH CAROLINA	)
COUNTY OF MECKLENBURG	) SS: )
The undersigned, Beth White, GM	M Customer Billing, being duly sworn, deposes
and says that he has personal knowledge	e of the matters set forth in the foregoing data
requests, and that the answers contained	therein are true and correct to the best of his
knowledge, information and belief.	
	Beth White, Affiant
Subscribed and sworn to before 10, 2023.	e me by Beth White on this 3/ day of
WINDERLY M BOSTILL	Hinludy Marker NOTARY PUBLIC
NOTAAL Z	My Commission Expires: //-9-24

# **KyPSC Case No. 2022-00289 TABLE OF CONTENTS**

DATA REQUEST	<u>WITNESS</u>	<u>TAB NO.</u>
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Duke Energy Kentucky Case No. 2022-00289 STAFF Fourth Set Data Requests Date Received: October 30, 2023

**STAFF-DR-04-001** 

### **REQUEST:**

Provide Ms. Eichelberger's bills from August 2023 to present.

### **RESPONSE:**

Please see STAFF-DR-04-001 Attachment.

**PERSON RESPONSIBLE:** Amber Kaufman



### **Your Energy Bill**

Page 1 of 4

Service address BETTY EICHELBERGER

Bill date Aug 21, 2023 For service Jul 19 - Aug 17

30 days

### **Billing summary**

Payment Received Aug 04 Current Budget Billing Plan Charges	-291.00 248.00
Other Charges and Credits	0.84
Taxes	0.08
Total Amount Due Sep 11	\$251.07

Thank you for your payment.

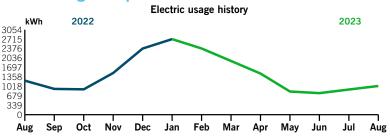
The miscellaneous adjustment displaying in the Billing Summary is a result of an incorrect Rider PMM (Pipeline Modernization Mechanism) rate calculation, which was incorrectly applied as a credit rather than a charge, on your previous bill. An adjustment has been applied to reverse the credit amount and correctly apply the PMM Rider charge. We apologize for the inconvenience.

Account number

Duke Energy does not maintain customers' natural gas piping after or downstream of the meter. You should maintain such piping by periodically inspecting for leaks. If the piping is metal, you should also check for signs of corrosion. You should repair such piping if leaks or corrosion are discovered. For assistance locating, inspecting or repairing buried piping, please contact a licensed heating/plumbing contractor. You should always call 811 prior to digging. Once your lines are marked, always dig by hand if digging near natural gas piping.

Track your energy use to discover ways to help lower your bills. You'll see when your usage is high, so you can adjust habits to help save. Learn how at duke-energy.com/TrackUsage.

#### Your usage snapshot



#### Average temperature in degrees

74°	68°	54°	46°	36°	40°	42°	43°	55°	63°	70°	76°	74°
		Cur	rent M	onth	Aug 2	022	12-M	onth Us	age	Avg Mo	nthly U	Isage
Electri	ic (kWh	1)	1,031		1,22	23	1	7,755		1	,480	
12-m	onth us	age ba	sed on	most ı	ecent h	istory						

Mail your payment at least 7 days before the due date or pay instantly at duke-energy.com/billing. Late payments are subject to a 5.0% late charge.

Please return this portion with your payment. Thank you for your business.



PO Box 1090

Duke Energy Return Mail

Charlotte, NC 28201-1090

Account number

After Sep 11, the amount due will increase to \$251.07.

Add here, to help others with a contribution to Share the Light

\$251.07

by Sep 11

**Amount enclosed** 

**BETTY EICHELBERGER** 

**Duke Energy Payment Processing** PO Box 1094 Charlotte, NC 28201-1094



Page 2 of 4 Account number

#### We're here for you

#### Report an emergency

Electric/Gas outage

duke-energy.com/outages Electric 800.543.5599

Gas 800.634.4300

#### Convenient ways to pay your bill

Online Automatically from your bank account

Speedpay (fee applies)

By mail payable to Duke Energy

In person

duke-energy.com/billing duke-energy.com/autodraft duke-energy.com/pay-now

800.544.6900 P.O. Box 1094

Charlotte, NC 28201-1094

duke-energy.com/location

#### **Help managing your account** (not applicable for all customers)

Register for free paperless billing

Home

**Business** 

duke-energy.com/paperless duke-energy.com/manage-home duke-energy.com/manage-bus

#### **Correspond with Duke Energy** (not for payment)

P.O. Box 1326

Charlotte, NC 28201

#### General questions or concerns

Online Home: Mon - Fri (7 a.m. to 7 p.m.)

Business: Mon - Fri (7 a.m. to 6 p.m.) 800.774.1202

For hearing impaired TDD/TTY

International

duke-energy.com 800.544.6900

711

1.407.629.1010

#### Request the condensed or detailed bill format

Call (7a.m. to 7 p.m.) 800.544.6900

#### Important to know

#### Your next meter reading: Sep 18

Please be sure we can safely access your meter for actual readings. Don't worry if your digital meter flashes eights from time to time. That's a normal part of the energy measuring process.

#### Your service(s) may be disconnected if your payment is past due

If payment for your service(s) is past due, we may begin disconnection procedures. If your service is disconnected because of a missed payment, you must pay the amount specified in the **Important Disconnect Information** section on your bill, as well as, a reconnection fee, before vour service will be reconnected. The reconnection fee is \$5.88 for electric service that may be reconnected remotely, \$60 for electric service that is not eligible to be reconnected remotely, \$125 for electric service that was disconnected at the pole and \$90 for gas service. There is an additional fee of \$40 to reconnect electric service after normal business hours if not eligible to be reconnected remotely. A security deposit may also be required.

#### Electric service does not depend on payment for other products or services

Non-payment for non-regulated products or services (such as surge protection or equipment service contracts) may result in removal from the program but will not result in disconnection of electric service.

#### When you pay by check

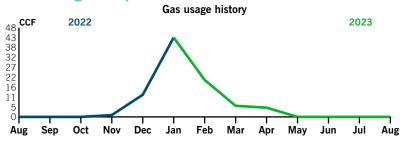
We may process the payment as a regular check or convert it into a one-time electronic check payment.

#### Para nuestros clientes que hablan Español

Representantes bilingües están disponibles para asistirle de lunes a viernes de 7 a.m. -7 p.m. Para obtener más información o reportar problemas con su servicio eléctrico, favor de llamar al 800.544.6900.



### Your usage snapshot - Continued



#### Average temperature in degrees

160

74	00 .	J4 ·	+0	30	40	42	43	33	03	70	70	74
		Curre	nt Moi	nth	Aug 2	022	12-Mo	nth Us	age	Avg Mo	nthly U	sage
Gas (CC	F)		0		0			87			7	
12-mor	12-month usage based on most recent history											



Current electric usage for meter number 320303612						
Actual reading on A Previous reading of	0	113636 - 112605				
Energy Used		1,031 kWh				
Billed kWh	1,031.000 kWh					
Current Gas usage for meter number 1291848						

Current Gas usage for meter number 1291848	
Actual reading on Aug 17 Previous reading on Jul 19	609 - 609
Gas Used	0 CCF

### **Billing details - Electric**

Billing Period - Jul 19 23 to Aug 17 23		
Meter - 320303612		
Customer Charge	\$12.90	
Energy Charge		
1,031.000 kWh @ \$0.08099500	83.50	
Demand Side Management Cost Recovery Program Rider (DSM)		
1,031.000 kWh @ \$0.00349700	3.61	
Off-System Sales Profit Sharing Mechanism Rider (PSM)		
1,031.000 kWh @ \$-0.00490700	-5.06	
Electric Fuel Adjustment		
1,031.000 kWh @ \$0.00949300	9.78	



7/10

Your Annual Budget Billing Plan keeps your monthly charge steady throughout the year, even as your usage goes up or down.

At renewal, we may adjust the amount of your monthly charge for the next plan year, based on your actual usage in this plan year. So far this year, you have a difference of \$-484.37 between plan charges and actual usage costs.

Your current rate is Residential Service (RS).

For a complete listing of all Kentucky rates and riders, visit dukeenergy.com/rates



### **Billing details - Electric continued**

Environmental Surcharge Mechanism Rider (ESM)	\$10.66
Total Current Charges	\$115.39

### **Billing details - Gas**

Billing Period - Jul 19 23 to Aug 17 23	
Meter - 1291848	
Customer Charge	\$17.80
PMM Rider	
1.000 @ \$1.15000000	1.15
Total Current Charges	\$18.95

Your current rate is Residential Service (RS).

### **Billing details - Other Charges and Credits**

KY_Gas PMM Rider Dr	\$0.84
Total Other Charges and Credits	\$0.84

### **Billing details - Taxes**

Franchise Fee	\$4.59
Rate Increase For School Tax	4.17
Kentucky Sales Tax	0.05
Total Taxes	\$8.81



### **Your Energy Bill**

Page 1 of 4

**Service address**BETTY EICHELBERGER

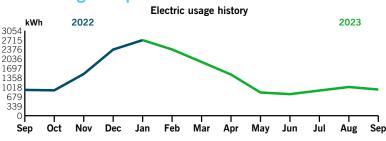
Bill date Sep 20, 2023 For service Aug 18 - Sep 18 32 days

Account number

### **Billing summary**

Previous Amount Due	\$251.07
Payment Received Sep 06	-499.07
Current Budget Billing Plan Charges	248.00
Other Charges and Credits	-0.08
Credit Amount, Do Not Pay	\$-0.08

### Your usage snapshot



#### Average temperature in degrees

00-	54-	40-	30-	40-	42"	43	55-	03-	70-	76-	75-	/3-					
		Cur	Current Month		Sep 2022		12-Month Usage			Avg Monthly Usage							
Electri	c (kWh)		940			6	17,769			1	,481						
12-m	onth usa	ge ba	sed on	most i	recent h	12-month usage based on most recent history											

\$

Thank you for your payment.

Know what's below. Call before you dig. Always call 811 before you dig, it's the law. Making this free call at least two full working days before you dig gets utility lines marked and helps protect you from injury and expense. Call 811 or visit call811.com.

The miscellaneous credit adjustment displaying in the Billing Summary is to correct sales tax charges that were previously applied to your account as part of the Pipeline Meter Modernization Tariff charge. We apologize for the inconvenience.

Mail your payment at least 7 days before the due date or pay instantly at duke-energy.com/billing. Late payments are subject to a 5.0% late charge.

Please return this portion with your payment. Thank you for your business.



Duke Energy Return Mail PO Box 1090 Charlotte, NC 28201-1090 Account number

Amount due

\$0.00

No payment is required at this time

\$\_\_\_\_Add here, to help others with a contribution to Share the Light

**Amount enclosed** 

**BETTY EICHELBERGER** 

Duke Energy Payment Processing PO Box 1094 Charlotte, NC 28201-1094



duke-energy.com 800.544.6900

Page 2 of 4 Account number

#### We're here for you

#### Report an emergency

Electric/Gas outage

duke-energy.com/outages 800.543.5599

Electric Gas

800.634.4300

#### Convenient ways to pay your bill

Online

Automatically from your bank account

Speedpay (fee applies)

duke-energy.com/autodraft duke-energy.com/pay-now

duke-energy.com/billing

800.544.6900 P.O. Box 1094

By mail payable to Duke Energy

Charlotte, NC 28201-1094

In person

duke-energy.com/location

#### **Help managing your account** (not applicable for all customers)

Register for free paperless billing

Home **Business**  duke-energy.com/paperless duke-energy.com/manage-home duke-energy.com/manage-bus

#### **Correspond with Duke Energy** (not for payment)

P.O. Box 1326

Charlotte, NC 28201

#### General questions or concerns

Online

duke-energy.com Home: Mon - Fri (7 a.m. to 7 p.m.) 800.544.6900

Business: Mon - Fri (7 a.m. to 6 p.m.) 800.774.1202

For hearing impaired TDD/TTY

711

International

1.407.629.1010

#### Request the condensed or detailed bill format

Call (7a.m. to 7 p.m.)

800.544.6900

#### Important to know

#### Your next meter reading: Oct 18

Please be sure we can safely access your meter for actual readings. Don't worry if your digital meter flashes eights from time to time. That's a normal part of the energy measuring process.

#### Your service(s) may be disconnected if your payment is past due

If payment for your service(s) is past due, we may begin disconnection procedures. If your service is disconnected because of a missed payment, you must pay the amount specified in the **Important Disconnect Information** section on your bill, as well as, a reconnection fee, before vour service will be reconnected. The reconnection fee is \$5.88 for electric service that may be reconnected remotely, \$60 for electric service that is not eligible to be reconnected remotely, \$125 for electric service that was disconnected at the pole and \$90 for gas service. There is an additional fee of \$40 to reconnect electric service after normal business hours if not eligible to be reconnected remotely. A security deposit may also be required.

#### Electric service does not depend on payment for other products or services

Non-payment for non-regulated products or services (such as surge protection or equipment service contracts) may result in removal from the program but will not result in disconnection of electric service.

#### When you pay by check

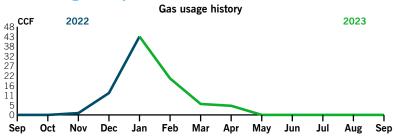
We may process the payment as a regular check or convert it into a one-time electronic check payment.

#### Para nuestros clientes que hablan Español

Representantes bilingües están disponibles para asistirle de lunes a viernes de 7 a.m. -7 p.m. Para obtener más información o reportar problemas con su servicio eléctrico, favor de llamar al 800.544.6900.



### Your usage snapshot - Continued



#### Average temperature in degrees

00	34	40	30	40	42	43	55	03	70	70	75	73
		Current Month		Sep 2022		12-Month Usage		Avg Monthly Usage		Jsage		
Gas (C	Gas (CCF) 0				С			87			7	
12-mo	12-month usage based on most recent history											





Your Annual Budget Billing Plan keeps your monthly charge steady throughout the year, even as your usage goes up or down.

At renewal, we may adjust the amount of your monthly charge for the next plan year, based on your actual usage in this plan year. So far this year, you have a difference of \$-591.46 between plan charges and actual usage costs.

Thank you for participating in our Budget Billing Plan (BBP). After reviewing your account, we have determined that your BBP amount will need to be adjusted to better reflect your actual energy usage. Your monthly BBP amount will be changed from **\$248.00** to **\$51.00**. Your new BBP amount will be reflected on your next month's bill. Questions? Call 800.544.6900.

C	urrent electric usage for	r meter number 320303	612				
	ctual reading on Sep 18 revious reading on Aug 18	114576 - 113636					
E	nergy Used		940 kWh				
В	illed kWh	940.000 kWh					
С	urrent Gas usage for me	eter number 1291848					
	ctual reading on Sep 18 revious reading on Aug 18	3	609 - 609				
G	as Used		0 CCF				

### Billing details - Electric

Billing Period - Aug 18 23 to Sep 18 23		
Meter - 320303612		
Customer Charge	\$12.90	
Energy Charge		
940.000 kWh @ \$0.08099500	76.14	
Demand Side Management Cost Recovery Program Rider (DSM)		
940.000 kWh @ \$0.00349700	3.29	

Your current rate is Residential Service (RS).

For a complete listing of all Kentucky rates and riders, visit duke-energy.com/rates

Your current rate is Residential Service (RS).



### **Billing details - Electric continued**

Total Current Charges	\$113.36
Environmental Surcharge Mechanism Rider (ESM)	11.14
940.000 kWh @ \$0.00792900	7.45
Electric Fuel Adjustment	
940.000 kWh @ \$0.00259600	\$2.44
Off-System Sales Profit Sharing Mechanism Rider (PSM)	

## **Billing details - Gas**

Billing Period - Aug 18 23 to Sep 18 23	
Meter - 1291848	
Customer Charge	\$17.80
PMM Rider	
1.000 @ \$1.15000000	1.15
Total Current Charges	\$18.95

## **Billing details - Other Charges and Credits**

Total Other Charges and Credits	\$-0.08
KY State Sales Tax Credit	-0.05
KY Franchise Fee Credit	\$-0.03

### **Billing details - Taxes**

Franchise Fee	\$4.49
Rate Increase For School Tax	4.11
Total Taxes	\$8.60



### **Your Energy Bill**

Page 1 of 4

Service address
BETTY EICHELBERGER

Bill date Oct 24, 2023 For service Sep 19 - Oct 18 30 days

Account number

Previous Amount Due \$-0.08

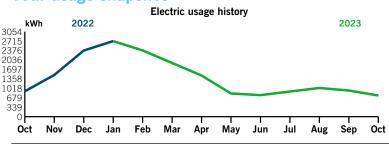
Payment Received Oct 05 -248.00

Current Budget Billing Plan Charges 51.00

Credit Amount, Do Not Pay \$-197.08

#### Your usage snapshot

**Billing summary** 



#### Average temperature in degrees

<del></del>	- 50	40	72	40	- 55	00	, 0	,,,	, ,		01	
	Cu	<b>Current Month</b>		Oct 2022		12-Month Usage			Avg Monthly Usage			
Electric (kWh) 760				91	1	1	7,618		1	,468		
12-month usage based on most recent history												

\$

610

Thank you for your payment.

To help us repair malfunctioning streetlights, quickly: 1. Visit dukeenergy.com/lightrepair 2. Provide us with the light's location and your contact information. 3. Specific addresses, landmarks and directions work best.

Mail your payment at least 7 days before the due date or pay instantly at duke-energy.com/billing. Late payments are subject to a 2.3% late charge.

Please return this portion with your payment. Thank you for your business.



Duke Energy Return Mail PO Box 1090 Charlotte, NC 28201-1090 Account number

Amount due

\$0.00

No payment is required at this time.

\$\_\_\_\_Add here, to help others with a contribution to Share the Light

**Amount enclosed** 

**BETTY EICHELBERGER** 

Duke Energy Payment Processing PO Box 1094 Charlotte, NC 28201-1094



duke-energy.com 800.544.6900

Page 2 of 4 Account number

#### We're here for you

#### Report an emergency

Electric/Gas outage

duke-energy.com/outages Electric 800.543.5599 Gas 800.634.4300

#### Convenient ways to pay your bill

Online

Automatically from your bank account

Speedpay (fee applies)

800.544.6900 P.O. Box 1094

By mail payable to Duke Energy

Charlotte, NC 28201-1094 duke-energy.com/location

In person

duke-energy.com/billing

duke-energy.com/autodraft

duke-energy.com/pay-now

#### **Help managing your account** (not applicable for all customers)

Register for free paperless billing

Home

**Business** 

duke-energy.com/paperless duke-energy.com/manage-home duke-energy.com/manage-bus

#### **Correspond with Duke Energy** (not for payment)

P.O. Box 1326

Charlotte, NC 28201

#### General questions or concerns

Online

Home: Mon - Fri (7 a.m. to 7 p.m.)

Business: Mon - Fri (7 a.m. to 6 p.m.) 800.774.1202

For hearing impaired TDD/TTY

International

duke-energy.com

800.544.6900

711

1.407.629.1010

#### Request the condensed or detailed bill format

Call (7a.m. to 7 p.m.)

800.544.6900

#### Important to know

#### Your next meter reading: Nov 16

Please be sure we can safely access your meter for actual readings. Don't worry if your digital meter flashes eights from time to time. That's a normal part of the energy measuring process.

#### Your service(s) may be disconnected if your payment is past due

If payment for your service(s) is past due, we may begin disconnection procedures. If your service is disconnected because of a missed payment, you must pay the amount specified in the **Important Disconnect Information** section on your bill, as well as, a reconnection fee, before vour service will be reconnected. The reconnection fee is \$5.88 for electric service that may be reconnected remotely, \$60 for electric service that is not eligible to be reconnected remotely, \$125 for electric service that was disconnected at the pole and \$90 for gas service. There is an additional fee of \$40 to reconnect electric service after normal business hours if not eligible to be reconnected remotely. A security deposit may also be required.

#### Electric service does not depend on payment for other products or services

Non-payment for non-regulated products or services (such as surge protection or equipment service contracts) may result in removal from the program but will not result in disconnection of electric service.

#### When you pay by check

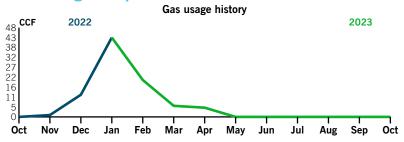
We may process the payment as a regular check or convert it into a one-time electronic check payment.

#### Para nuestros clientes que hablan Español

Representantes bilingües están disponibles para asistirle de lunes a viernes de 7 a.m. -7 p.m. Para obtener más información o reportar problemas con su servicio eléctrico, favor de llamar al 800.544.6900.



### Your usage snapshot - Continued



# Average temperature in degrees

J+	+0	50	+0	72	73	55		70	70	7.5	05	01
		Current Month		Oct 2022		12-Month Usage		age	Avg Monthly Usage			
Gas (CCF) 0					0			87			7	
12-mor	th usag	ge base	d on r	nost r	ecent h	istory						



Current electric usage for meter number 320303612										
Actual reading on C Previous reading or		115336 - 114576								
Energy Used		760 kWh								
Billed kWh	760.000 kWh									
Current Gas usage for meter number 1291848										
Actual reading on C Previous reading or		609 - 609								



610

0 CCF

Your Annual Budget Billing Plan keeps your monthly charge steady throughout the year, even as your usage goes up or down.

At renewal, we may adjust the amount of your monthly charge for the next plan year, based on your actual usage in this plan year. So far this year, you have a difference of \$-518.38 between plan charges and actual usage costs.

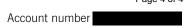
### **Billing details - Electric**

Gas Used

Billing Period - Sep 19 23 to Oct 18 23		
Meter - 320303612		
Customer Charge - Sep 19 to Oct 12	\$10.08	
Customer Charge - Oct 13 to Oct 18	2.60	
Energy Charge - Sep 19 to Oct 12		
608.000 kWh @ \$0.08099500	49.24	
Home Energy Assistance Prgm	0.30	
Energy Charge - Oct 13 to Oct 18		
152.000 kWh @ \$0.09965400	15.15	
Demand Side Management Cost Recovery Program Rider (DSM)		
760.000 kWh @ \$0.00349700	2.66	

Your current rate is Residential Service (RS).

For a complete listing of all Kentucky rates and riders, visit duke-energy.com/rates



## **Billing details - Electric continued**

Total Current Charges	\$	97.56
Environmental Surcharge Mechanism Rider (ESM)	8.65	
760.000 kWh @ \$0.00909100	6.91	
Electric Fuel Adjustment		
760.000 kWh @ \$0.00259600	\$1.97	
Off-System Sales Profit Sharing Mechanism Rider (PSM)		

## **Billing details - Gas**

Billing Period - Sep 19 23 to Oct 18 23	
Meter - 1291848	
Customer Charge	\$17.80
PMM Rider	
1.000 @ \$1.15000000	1.15
Total Current Charges	\$18.95

Your current rate is Residential Service (RS).

For a complete listing of all Kentucky rates and riders, visit duke-energy.com/rates

## **Billing details - Taxes**

Franchise Fee	\$3.96
Rate Increase For School Tax	3.61
Total Taxes	\$7.57

**Duke Energy Kentucky** Case No. 2022-00289

**STAFF Fourth Set Data Requests** Date Received: October 30, 2023

**STAFF-DR-04-002** 

**REQUEST:** 

Refer to Duke Kentucky's response to Commission Staff's First Request for Information,

Item 3(b).

a. Provide any authority permitting use of a three-month average in calculating

budget billing instead of a 12-month average for gas and electric budget billing.

b. Provide any authority permitting use of average billings instead of average

usage at present rates.

**RESPONSE:** 

The Company does not use a 3-month average in calculating budget bill a.

amounts. Please see the Company's response to STAFF-DR-04-003(b). .

Neither the Company's gas nor electric tariffs specify which rates are b.

applied to usage to calculate the budget bill amount, only that usage will be used. The

Company believes that using the rates that were billed at the time that usage occurred leads

to a better estimate it incorporates the fluctuation of rates month-to-month and reduces the

likelihood that a budget amount will be set on the basis of a relative outlier rate. .

PERSON RESPONSIBLE:

Beth White

<sup>1</sup> See KY.P.S.C. Electric No. 2, Sheet No. 25, p. 3 ("The Annual Plan provides 11 months of equal payments by using 12 months of customer's usage, dividing the usage by 11, and using the result to calculate the bill."); KY.P.S.C. Gas No. 2, Sheet No. 25, p. 3 ("The Annual Plan provides 12 months of equal payments by using

12 months of customers' usage, dividing the usage by 12, and using the result to calculate the bill.").

Duke Energy Kentucky
Case No. 2022-00289
Fourth Set Data Requests

STAFF Fourth Set Data Requests Date Received: October 30, 2023

**STAFF-DR-04-003** 

**REQUEST:** 

Refer to Duke Kentucky's electric tariff<sup>2</sup> and Duke Kentucky's response to Commission

Staff's Third Request for Information (Staff's Third Request), Item 4.

a. Identify all budget billing adjustments made to Ms. Eichelberger's account

for electric service and provide any written request by Ms. Eichelberger to change budget

billings or any documentation of phone calls in which she requested to change budget

billings.

b. Provide separate calculations for gas and electric budget billing quarterly

changes identified in Duke Kentucky's response to Staff's Third Request, Item 4(a).

c. If Duke Kentucky's response to request 4(b) above includes changes to

electric budget billing, provide any authority permitting Duke Kentucky to change electric

budget billing amounts quarterly.

**RESPONSE:** 

a. Account notes and Interaction records were reviewed on Ms. Eichelberger's

account, no documentation was found of a request for a change in the budget bill amount

in the past 12 months. Available phone call recordings were also reviewed. There was no

documentation associated with phone calls to indicate the customer requested a change in

the Budget Billing Plan amount in the past 12 months.

<sup>2</sup> KY.P.S.C. Electric 2, Sixth Revised Sheet No. 25 (issued Mar. 18, 2022), page 3, effective April 18, 2022.

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- In October of 2022, the electric portion was changed from \$296 to \$177,
   the gas portion was changed from \$37 to \$35.
- The plan was renewed in January of 2023, the electric portion of which was \$229, and the gas was \$39.
- The plan was reviewed in April of 2023, the electric portion was changed to \$248, and gas was changed to \$43.
- The plan was reviewed in July of 2023, the electric portion was changed to \$210, and the gas was changed to \$38.
- The plan was reviewed in October of 2023, the electric portion was changed to \$40, and the gas was changed to \$11.
- b. Please see response to STAFF-DR-04-004 for explanation on how Accumulator (Budget Billing Balance) is calculated. Quarterly reviews are calculated as (Plan Price+ (Accumulator Total/Months Remaining in plan)). See STAFF-DR-04-003 Attachment which hosts calculations for gas and electric separately for 2022 and 2023.

Note: Accumulator charges columns are blank for January and February of 2022 due to plan differences in legacy system.

c. Previously, in response to STAFF-DR-03-004, the Company indicated that with the implementation of Customer Connect, a Budget Billing tariff update was filed for the Duke Energy Kentucky Gas Budget Billing Annual Plan, however, the Company inadvertently failed to file an update to the Kentucky Electric Budget Billing Annual Plan. The Company plans to file an update to the Electric Annual Plan now that an order has been issued in the Company's rate case, Case No. 2022-00372.

**PERSON RESPONSIBLE:** Amber Kaufman – a. Beth White – a., b., c.

Service Date End	Electric Charges	Electric Budget Bill Plan	Electric Charges with Tax	Single Month Electric Accumulator	Rolling Electric Accumulator	Gas Charges	Gas Budget Bill Plan	Gas Charges with Tax	Single Month Gas Accumulator	Rolling Gas Accumulator	Tax	Total	Plan amount
1/20/2022	\$391.72	\$296.00	\$417.19			\$76.74	\$37.00	\$81.73			\$30.46	\$498.92	\$333.00
2/18/2022	\$322.53	\$0.00	\$343.50		\$243.02	\$120.10	\$0.00	\$127.91		\$61.32	\$28.79	\$471.42	\$0.00
3/18/2022	\$204.87	\$296.00	\$218.20	\$218.20	\$461.22	\$34.85	\$37.00	\$37.11	\$37.11	\$98.43	\$15.59	\$255.31	\$333.00
4/19/2022	\$229.79	\$296.00	\$244.73	-\$51.27	\$409.95	\$20.93	\$37.00	\$22.29	-\$14.71	\$83.72	\$16.30	\$267.02	\$333.00
5/17/2022	\$113.94	\$296.00	\$121.35	-\$174.65	\$235.30	\$17.80	\$37.00	\$18.96	-\$18.04	\$65.68	\$8.57	\$140.31	\$333.00
6/17/2022	\$149.49	\$296.00	\$159.21	-\$136.79	\$98.51	\$17.80	\$37.00	\$18.96	-\$18.04	\$47.64	\$10.88	\$178.17	\$333.00
7/19/2022	\$157.00	\$296.00	\$167.21	-\$128.79	-\$30.28	\$17.80	\$37.00	\$18.96	-\$18.04	\$29.59	\$11.37	\$186.17	\$333.00
8/18/2022	\$141.51	\$296.00	\$150.71	-\$145.29	-\$175.57	\$17.80	\$37.00	\$18.96	-\$18.04	\$11.55	\$10.36	\$169.67	\$333.00
9/19/2022	\$108.78	\$296.00	\$115.85	-\$180.15	-\$355.72	\$17.80	\$37.00	\$18.96	-\$18.04	-\$6.49	\$8.23	\$134.81	\$333.00
		\$177.43					\$34.84						\$212.26
10/18/2022	\$143.80	\$177.00	\$153.15	-\$23.85	-\$379.57	\$17.80	\$35.00	\$18.96	-\$16.04	-\$22.53	\$10.51	\$172.11	\$212.00
11/16/2022	\$192.45	\$177.00	\$204.96	\$27.96	-\$351.61	\$19.51	\$35.00	\$20.78	-\$14.22	-\$36.76	\$13.78	\$225.74	\$212.00
12/16/2022	\$384.27	\$177.00	\$409.26	\$232.26	-\$119.35	\$32.94	\$35.00	\$35.08	\$0.08	-\$36.67	\$27.13	\$444.34	\$212.00

Service Date End	Electric Charges	Electric Budget Bill Plan	Electric Charges with Tax	Single Month Electric Accumulator	Rolling Electric Accumulator	Gas Charges	Gas Budget Bill Plan	Gas Charges with Tax	Single Month Gas Accumulator	Rolling Gas Accumulator	Тах	Total	Plan amount
1/20/2023	\$370.01	\$229.00	\$394.07	\$165.07	\$165.07	\$74.10	\$39.00	\$78.92	\$39.92	\$39.92	\$28.88	\$472.99	\$268.00
2/20/2023	\$258.48	\$229.00	\$275.29	\$46.29	\$211.35	\$47.67	\$39.00	\$50.77	\$11.77	\$51.69	\$19.91	\$326.06	\$268.00
3/21/2023	\$174.31	\$229.00	\$185.64	-\$43.36	\$168.00	\$24.89	\$39.00	\$26.51	-\$12.49	\$39.20	\$12.95	\$212.15	\$268.00
		\$247.67					\$43.36						\$291.02
4/20/2023	\$140.62	\$248.00	\$149.76	-\$98.24	\$69.76	\$22.27	\$43.00	\$23.72	-\$19.28	\$19.91	\$10.59	\$173.48	\$291.00
5/19/2023	\$88.43	\$248.00	\$94.18	-\$153.82	-\$84.06	\$17.80	\$43.00	\$18.96	-\$24.04	-\$4.13	\$6.91	\$113.14	\$291.00
6/21/2023	\$98.28	\$248.00	\$104.67	-\$143.33	-\$227.39	\$17.38	\$43.00	\$18.51	-\$24.49	-\$28.62	\$7.52	\$123.18	\$291.00
		\$210.10					\$38.23						\$248.33
7/24/2023	\$98.01	\$210.00	\$104.38	-\$105.62	-\$333.01	\$18.95	\$38.00	\$20.18	-\$17.82	-\$46.44	\$7.60	\$124.56	\$248.00
8/17/2023	\$115.39	\$210.00	\$122.89	-\$87.11	-\$420.11	\$18.95	\$38.00	\$20.18	-\$17.82	-\$64.25	\$8.81	\$143.15	\$248.00
9/18/2023	\$113.36	\$210.00	\$120.73	-\$89.27	-\$509.38	\$18.95	\$38.00	\$20.18	-\$17.82	-\$82.07	\$8.60	\$140.91	\$248.00
		\$40.21					\$10.64						\$50.85
10/18/2023	\$97.56	\$40.00	\$103.90	\$63.90	-\$445.48	\$18.95	\$11.00	\$20.18	\$9.18	-\$72.89	\$7.57	\$124.08	\$51.00
													\$51.00
													\$51.00

Duke Energy Kentucky Case No. 2022-00289

STAFF Fourth Set Data Requests

Date Received: October 30, 2023

**STAFF-DR-04-004** 

**REQUEST:** 

Refer to the Appendix to this request for information, which, using information from Ms.

Eichelberger's Duke Kentucky bills calculates her expected budget billing balance and

compares it to the budget billing balance listed on the bill itself. Beginning with the March

19, 2022, explain whether Commission Staff's calculations are correct. If so, explain why

the amounts on Ms. Eichelberger's actual bills are incorrect. If not, explain why and how

Commission Staff's calculations are incorrect.

**RESPONSE:** 

Commission Staff's calculations are incorrect; however, the bill presentation was also

incorrect for the February and March 2022 bill periods. There was an issue with bill

presentation relating to the Budget Billing Accumulator that was corrected in April 2022

with the conversion to the new Customer Information System (CIS).

Commission Staff's calculations are incorrect in that they are omitting the Budget

Billing Plan price and instead utilizing the customer's payment to calculate the Budget

Billing Balance. The payment is unrelated to the plan pricing or accumulator balance. If

the customer pays more than their total amount due on the bill statement, the excess remains

as a credit that applies to the following statement.

The March 2022 invoice notes \$892.65 as the Budget Billing Accumulator balance

which is the sum of the prior accumulator balance of \$637.34 plus the total current charges

for the March invoice of \$255.31, instead of adding the prior accumulator balance and the

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single month difference between the total charges and the budget billing charges (\$-77.69)

to note the Budget Billing Accumulator as \$559.65. This issue was corrected for the April

invoice forward.

Any charges listed separately on the billing invoice summary are outside of the plan

calculations. The attached Duke Energy calculation places these charges after the Total

Charges column to properly calculate the differences between the Budget Billing Plan

amount and Total Charges.

Additionally, the Budget Billing Annual Plan for Ms. Eichelberger's account ended

in December of 2022 and was renewed in January. This renewal results in a true-up on the

December statement, which resets the Budget Billing Accumulator for the new plan year.

Please see STAFF-DR-04-004 Attachment which contains the calculations of the

actual charges from March of 2022 to July of 2023, with the differences for each single

month and the rolling calculation of the Budget Bill Accumulator. The Duke Energy

Calculated Budget Billing Balance and Budget Billing Balance on Bill columns are in

alignment from April 2022 forward.

PERSON RESPONSIBLE:

Beth White

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								Duke	
						Budget		Calculated	Budget
						Billing	Single	Budget	Billing
	Electric	Gas		Total	Other	Plan	Month	Billing	Balance
Bill Date	Charges	Charges	Taxes	Charges	Charges	Amount	Difference	Balance	On Bill
2/28/2022	\$322.53	\$120.10	\$28.79	\$471.42				\$637.34	\$637.34
3/19/2022	\$204.87	\$34.85	\$15.59	\$255.31		\$333.00	-\$77.69	\$559.65	\$892.65
5/5/2022	\$229.79	\$20.93	\$16.30	\$267.02		\$333.00	-\$65.98	\$493.67	\$493.67
5/19/2022	\$113.94	\$17.80	\$8.57	\$140.31		\$333.00	-\$192.69	\$300.98	\$300.98
6/21/2022	\$149.49	\$17.80	\$10.88	\$178.17		\$333.00	-\$154.83	\$146.15	\$146.15
7/21/2022	\$157.00	\$17.80	\$11.37	\$186.17		\$333.00	-\$146.83	-\$0.68	-\$0.68
8/22/2022	\$141.51	\$17.80	\$10.36	\$169.67		\$333.00	-\$163.33	-\$164.01	-\$164.01
9/21/2022	\$108.78	\$17.80	\$8.23	\$134.81		\$333.00	-\$198.19	-\$362.20	-\$362.20
10/22/2022	\$143.80	\$17.80	\$10.51	\$172.11	\$16.65	\$212.00	-\$39.89	-\$402.09	-\$402.09
11/18/2022	\$192.45	\$19.51	\$13.78	\$225.74		\$212.00	\$13.74	-\$388.35	-\$388.35
12/20/2022	\$384.27	\$32.94	\$27.13	\$444.34		\$212.00	\$232.34	-\$156.01	-\$156.01
TOTALS	\$2,540.15	\$411.87	\$191.97	\$3,143.99		\$3,300.00	-\$156.01		
1/20/2023	\$370.01	\$74.10	\$28.88	\$472.99		\$268.00	-\$204.99	\$204.99	\$204.99
2/20/2023	\$258.48	\$47.67	\$19.91	\$326.06		\$268.00	-\$58.06	\$263.05	\$263.05
3/21/2023	\$174.31	\$24.89	\$12.95	\$212.15		\$268.00	\$55.85	\$207.20	\$207.20
4/20/2023	\$140.62	\$22.27	\$10.59	\$173.48		\$291.00	\$117.52	\$89.68	\$89.68
5/19/2023	\$88.43	\$17.80	\$6.91	\$113.14		\$291.00	\$177.86	-\$88.18	-\$88.18
6/21/2023	\$98.28	\$17.38	\$7.52	\$123.18		\$291.00	\$167.82	-\$256.00	-\$256.00
7/24/2023	\$98.01	\$18.95	\$7.60	\$124.56		\$248.00	\$123.44	-\$379.44	-\$379.44