

January 31, 2023

Via Email to PSCED@ky.gov

Ms. Linda C. Bridwell, P.E.  
Executive Director  
Public Service Commission  
211 Sower Boulevard  
Frankfort, Kentucky 40602

RECEIVED  
JAN 31 2023  
PUBLIC SERVICE  
COMMISSION

Re: *Steven Horton v. Duke Energy Kentucky, Inc.*— **Case No. 2022-00297**

Dear Ms. Bridwell:

Please find attached for electronic filing with the Commission, Duke Energy Kentucky, Inc.'s Responses to Commission Staff's Second Request for Information in the above-styled case.

This is to certify that this is a true and accurate copy of the document that was filed via email with the Commission on January 31, 2023. A copy of this filing was emailed and mailed via U.S. Mail on January 31, 2023 to the Complainant and the Commission.

If you have any questions, please let me know.

Very truly yours,



L. Allyson Honaker

Enclosure

VERIFICATION

STATE OF INDIANA )  
 ) SS:  
COUNTY OF HENDRICKS )

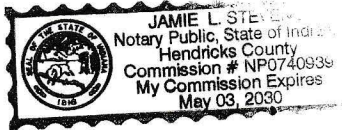
The undersigned, Amber Kaufman, Consumer Affairs Specialist, being duly sworn, deposes and says that he has personal knowledge of the matters set forth in the foregoing data requests, and that the answers contained therein are true and correct to the best of his knowledge, information and belief.

*Amber Kaufman*

Amber Kaufman, Affiant

Subscribed and sworn to before me by Amber Kaufman on this 17 day of January, 2023.

*Jamie L. Stever*  
NOTARY PUBLIC



My Commission Expires: May 3, 2030

**KyPSC Case No. 2022-00297**  
**TABLE OF CONTENTS**

<b><u>DATA REQUEST</u></b>	<b><u>WITNESS</u></b>	<b><u>TAB NO.</u></b>
STAFF-DR-02-001	Amber Kaufman.....	1
STAFF-DR-02-002	Amber Kaufman.....	2

**Duke Energy Kentucky**  
**Case No. 2022-00297**  
**STAFF Second Set Data Requests**  
**Date Received: January 10, 2023**

**STAFF-DR-02-001**

**REQUEST:**

Refer to Duke Kentucky’s Answer, Exhibit 1, Meter Testing Information, unnumbered page 2 of 2, in which an undated memorandum indicates that Mr. Horton requested an accuracy test on his meter and that Duke Kentucky conducted the accuracy test on June 29, 2022. Also refer to Duke Kentucky’s response to Commission Staff’s First Request for Information (Staff’s First Request), Item 1(b), in which Duke Kentucky states that “Mr. Horton did not request the meter to be tested[,]” and Staff’s First Request, Item 1(c), in which Duke Kentucky states that Mr. Horton’s meter “was sent on June 20, 2022 to be recycled at a third-party facility.”

a. Reconcile the discrepancy between Duke Kentucky’s Answer and Duke Kentucky’s response to Staff’s First Request regarding whether Mr. Horton requested that his meter be tested.

b. If Mr. Horton did request his meter to be tested, provide the date such request was made and the manner in which the request was made. If Mr. Horton’s request was made in writing, provide a copy of Mr. Horton’s written request.

c. Reconcile the discrepancy between Duke Kentucky’s Answer and Duke Kentucky’s response to Staff’s First Request regarding when the meter was tested and when the meter was sent to be recycled and provide the actual dates of the meter test and when the meter was sent to be recycled.

**RESPONSE:**

Gas Operations received the old meter on 6/20/2022 and completed a meter test and electronically pulled all the meter data on 6/29/2022. Once that information was gathered, the meter was sent to United Scrap Metal for Asset Recovery for disposal.

Mr. Horton did not request a meter test until after the meter had already been destroyed, but the test itself was completed when received at the lab, prior to the meter being sent to United Scrap Metal for Asset Recovery for disposal and prior to Mr. Horton's request. He inquired via email on 7/13/2022 questioning the validity of the information submitted and was advised on 7/15/2022 that we had performed the meter test. Please see STAFF-DR-02-001 Attachment for the email chain between Mr. Horton and I. Mr. Horton requested his gas usage history going all the way back to 2014, which was provided to him on 7/15/2022. Mr. Horton believes that the information provided to him is false, due to never consuming more than 2 CCF in the prior years for the same time.

**PERSON RESPONSIBLE:** Amber Kaufman

**From:** [Steve Horton](#)  
**To:** [Consumer Affairs MW](#)  
**Cc:** [Steve Horton](#)  
**Subject:** RE: [EXTERNAL] Re: Gas Meter Confirmation  
**Date:** Friday, July 15, 2022 1:49:25 PM  
**Attachments:** [image001.png](#)

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Well, please look at the June readings usage from 2015 – 2022

2022 = 10  
2021 = 2  
2020 = 2  
2019 = 0  
2018 = 0  
2017 = 0  
2016 = 0  
2015 = 0

Can't you see what is wrong? As you are unable to provide pictures of the old meter Duke cannot tell me that the old meter can be confirmed by visual evidence.

As you can't seem to understand what the issue is, I want to be credited for 8 CF or I want to speak to your supervisor. I don't want to continue with you as you can't seem to use common sense. Look at the numbers used that you provided to me. If Duke doesn't want to be reasonable, I will continue this through KY PSC using the data you have provided and pursue this with any options at my disposal.

Steve Horton  
[REDACTED]

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**From:** Consumer Affairs MW [REDACTED]  
**Sent:** Friday, July 15, 2022 1:22 PM  
**To:** [REDACTED]  
**Subject:** RE: [EXTERNAL] Re: Gas Meter Confirmation

Good afternoon Mr. Horton,

I apologize for my delay in response.

I have received your voicemail to corporate expressing your additional concerns after your recent filing with KY PSC. Attached you will find the additional usage history that you requested. Our system would only allow us to go back as far as 6/18/2014. The meter was electronically scanned into the system from Gas Operations with a final meter read of 3187. As previously advised, a meter test was performed upon its arrival, and the meter test results were good. The results were within the 98-102% limits, with results of 99.23% open and 100.16% check. Unfortunately, we are unable to provide a photo of the physical meter, as it was sent for recycling after the data was pulled and submitted.

The only error that has occurred was with the system integration obtaining an incorrect meter read for the start of service with your new meter. That error has been fixed, and no other errors have been experienced for your account. I apologize for any inconveniences you've experienced. You currently have a credit of \$12.25 on your account that will be applied towards future billing until it has been depleted. A new billing statement should be issued within 24-48 business hours for the next cycle.

Please let me know if you have any further questions.

Thank you,

*Amber*

Midwest Consumer Affairs Specialist



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**From:** Steve Horton [REDACTED]  
**Sent:** Wednesday, July 13, 2022 4:09:17 PM  
**To:** Consumer Affairs MW [REDACTED]  
**Subject:** [EXTERNAL] Re: Gas Meter Confirmation

**\*\*\* CAUTION! EXTERNAL SENDER \*\*\* STOP. ASSESS. VERIFY!!** Were you expecting this email? Are grammar and spelling correct? Does the content make sense? Can you verify the sender? If suspicious report it, then do not click links, open attachments or enter your ID or password.

This is still not correct. How can I dispute this and where is the photo of the meter? Look at the June usage for 2020 & 2021. I would like June reading from 2014 - 2019. How can I trust what I am being told as you admitted to an error on the new meter.

Common sense needs to prevail here. How do I contact the CEO of Duke? I will take this as far as I can.

Steve Horton

Sent from my iPhone

On Jul 13, 2022, at 3:55 PM, Consumer Affairs MW [REDACTED] wrote:

Good afternoon Mr. Horton,

I apologize for my delayed response.

Our Gas Operations team was able to confirm the old meter that was installed at your property was 1100223, and was delivered back to the Duke Energy shop on 6/20/2022 with a final read of 3187. A meter test was performed upon its arrival, and the meter test results were good. The results were within the 98-102% limits, with results of 99.23% open and 100.16% check. The billing statement you received is correct.

Attached, you will find the usage history for your services for the last two years.

Please let me know if you have any further questions. You can reply to this email, or contact Customer Service Monday through Friday 7 a.m. to 7 p.m. at 800-544-6900.

Best regards,

*Amber*

Midwest Consumer Affairs Specialist

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**Duke Energy Kentucky  
Case No. 2022-00297  
STAFF Second Set Data Requests  
Date Received: January 10, 2023**

**STAFF-DR-02-002**

**REQUEST:**

Refer to Duke Kentucky's Answer, Exhibit 1, Meter Testing Information, unnumbered page 1 of 2. Provide a legible copy of the meter test report.

**RESPONSE:**

Please see STAFF-DR-02-002 Attachment.

**PERSON RESPONSIBLE:** Amber Kaufman

Meter

<table style="width: 100%; border-collapse: collapse;"> <tr><td>Meter</td><td><input type="text" value="1100223IT"/></td></tr> <tr><td>Alternate ID</td><td><input type="text" value="T5505610"/></td></tr> <tr><td>Company Code</td><td><input type="text" value="ULH&amp;P"/></td></tr> <tr><td>Status</td><td><input type="text" value="Retired"/></td></tr> <tr><td>Service ID</td><td><input type="text"/></td></tr> <tr><td>Type Code</td><td><input type="text" value="1166IT2"/></td></tr> <tr><td>Location</td><td><input type="text" value="GMC"/></td></tr> <tr><td>Purchase Group</td><td><input type="text" value="001886"/></td></tr> <tr><td>Tamper Code</td><td><input type="text"/></td></tr> <tr><td>Periodic Interval</td><td><input type="text" value="8"/></td></tr> <tr><td>Sample Group</td><td><input type="text"/></td></tr> <tr><td>Shipment</td><td><input type="text"/></td></tr> <tr><td>Batch</td><td><input type="text"/></td></tr> <tr><td>Bin</td><td><input type="text"/></td></tr> <tr><td>Pallet</td><td><input type="text"/></td></tr> <tr><td>Box</td><td><input type="text"/></td></tr> </table>	Meter	<input type="text" value="1100223IT"/>	Alternate ID	<input type="text" value="T5505610"/>	Company Code	<input type="text" value="ULH&amp;P"/>	Status	<input type="text" value="Retired"/>	Service ID	<input type="text"/>	Type Code	<input type="text" value="1166IT2"/>	Location	<input type="text" value="GMC"/>	Purchase Group	<input type="text" value="001886"/>	Tamper Code	<input type="text"/>	Periodic Interval	<input type="text" value="8"/>	Sample Group	<input type="text"/>	Shipment	<input type="text"/>	Batch	<input type="text"/>	Bin	<input type="text"/>	Pallet	<input type="text"/>	Box	<input type="text"/>	<table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 30%;"></td> <td style="width: 35%; text-align: center;">Date</td> <td style="width: 35%; text-align: center;">By</td> </tr> <tr> <td>Receive</td> <td><input type="text" value="6/20/2022 9:05:58 AM"/></td> <td><input type="text" value="AROHRIG"/></td> </tr> <tr> <td>Pack</td> <td><input type="text"/></td> <td><input type="text"/></td> </tr> <tr> <td>Stock</td> <td><input type="text" value="8/22/2013 10:58:02 AM"/></td> <td><input type="text" value="51516"/></td> </tr> <tr> <td>Retire</td> <td><input type="text" value="6/29/2022 9:12:20 AM"/></td> <td><input type="text" value="T74965"/></td> </tr> <tr> <td>Connect</td> <td><input type="text"/></td> <td><input type="text"/></td> </tr> <tr> <td>Disconnect</td> <td><input type="text"/></td> <td><input type="text"/></td> </tr> <tr> <td>Change</td> <td><input type="text" value="6/29/2022 9:12:20 AM"/></td> <td><input type="text" value="T74965"/></td> </tr> <tr> <td>Remove</td> <td><input type="text" value="6/11/2022 4:00:00 AM"/></td> <td><input type="text" value="PP1SERVUSE"/></td> </tr> <tr> <td>Install</td> <td><input type="text" value="9/26/2017 1:10:00 PM"/></td> <td><input type="text" value="TJKEEN"/></td> </tr> <tr> <td>Manufacture Date</td> <td colspan="2"><input type="text" value="6/13/2013"/></td> </tr> <tr> <td></td> <td>Remove Reason</td> <td><input type="text"/></td> </tr> <tr> <td></td> <td>Retire Reason</td> <td><input type="text" value="MRAGE"/></td> </tr> </table>		Date	By	Receive	<input type="text" value="6/20/2022 9:05:58 AM"/>	<input type="text" value="AROHRIG"/>	Pack	<input type="text"/>	<input type="text"/>	Stock	<input type="text" value="8/22/2013 10:58:02 AM"/>	<input type="text" value="51516"/>	Retire	<input type="text" value="6/29/2022 9:12:20 AM"/>	<input type="text" value="T74965"/>	Connect	<input type="text"/>	<input type="text"/>	Disconnect	<input type="text"/>	<input type="text"/>	Change	<input type="text" value="6/29/2022 9:12:20 AM"/>	<input type="text" value="T74965"/>	Remove	<input type="text" value="6/11/2022 4:00:00 AM"/>	<input type="text" value="PP1SERVUSE"/>	Install	<input type="text" value="9/26/2017 1:10:00 PM"/>	<input type="text" value="TJKEEN"/>	Manufacture Date	<input type="text" value="6/13/2013"/>			Remove Reason	<input type="text"/>		Retire Reason	<input type="text" value="MRAGE"/>
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Hold	<input type="checkbox"/>	Obsolete	<input type="checkbox"/>	New	<input type="checkbox"/>
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**Flow Test** [Close] [Maximize] [Minimize]

AFWA Test

Meter ID: 1100223IT  
Alternate ID: T5505610  
Create Date: 6/29/2022 9:12:21 AM  
Company Code: ULH&P  
Test Reason: PERID  
 Pass  
Pass Count: 0  
Fail Count: 1  
 Manual Test  
 Field Test  
Outlet Pressure:   
Pressure Rate:   
TC Read:   
NC Read:   
Environment Code: S  
Drum Temperature:   
Sample Group: P-KY-GP175-425

Open AVG: 99.23  
Check AVG: 100.16

AFWA (0 - 425)  
AFWA (426 - 1000)  
AFWA (> 1000)

Results | Comments

**As Found**

Date: 6/29/2022 9:08:09 AM  
By: T74965  
Open: 99.23    Check: 100.16    DP: 0.28  
Rate: 250    Rate: 50    Prover: UP-0005

**As Left**

Date: 6/29/2022 9:08:09 AM  
By: T74965  
Open: 99.23    Check: 100.16    DP: 0.28  
Rate: 250    Rate: 50    Prover: UP-0005