

February 2, 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

FEB 02 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 Revised Response 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 February 2, 2023. A copy of this filing was emailed and mailed via U.S. Mail on February 2, 2023 to the Complainant and the Commission.

If you have any questions, please let me know.

Very truly yours,



L. Allyson Honaker

Enclosure

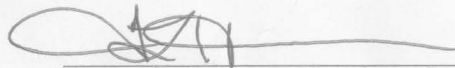
VERIFICATION

STATE OF INDIANA)
) SS:
COUNTY OF PUTNAM)

The undersigned, Amber Kaufman, Consumer Affairs Specialist, being duly sworn, deposes and says that she 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 her knowledge, information, and belief.


Amber Kaufman, Affiant

Subscribed and sworn to before me by Amber Kaufman on this 2nd day of FEBRUARY, 2023.


NOTARY PUBLIC

NOTARY PUBLIC - STATE OF INDIANA
SEAL
TAMMY L HUDELSON
COMMISSION NUMBER 709850
MY COMMISSION EXPIRES FEBRUARY 8, 2026

My Commission Expires: FEB. 8, 2026

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

REVISED 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.

ORIGINAL 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.

REVISED 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 an actual test of his meter, but rather he requested a photo of the meter itself to verify information. Mr. Horton was advised that a photo of the meter could not be provided because the meter had already been recycled. 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 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. He has requested his gas usage history from 2014 through 2019, which was provided to him on 7/15/2022. Mr. Horton attached the information that was provided to his Complaint in this proceeding.

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](#)

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]

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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