

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF DUKE ENERGY)	CASE NO.
KENTUCKY, INC. TO AMEND ITS DEMAND SIDE)	2024-00264
MANAGEMENT PROGRAMS)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO DUKE KENTUCKY ENERGY, INC.

Duke Kentucky Energy, Inc. (Duke Kentucky), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due on October 15, 2024. 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 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 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, pages 5–6 and Appendix A.
 - a. Explain how Duke Kentucky models the cost-effectiveness of each program.
 - b. Provide the avoided costs used to model the cost-effectiveness scores.

2. Refer to the Application, page 7. Explain which standards have changed for Duke Kentucky to modify or expand its The Non-Residential Smart \$aver® Incentive Program. Also include in the response, if possible, which new efficient technology Duke Kentucky considered including in its proposal but did not ultimately choose to include, and why Duke Kentucky chose to exclude the technology.

3. Refer to the Application, page 11. Provide the percentage of energy reduction to qualify for each proposed incentive tier.

4. Refer to the Application, page 12. In addition to email, direct mail, web enrollment, and call center promotion, specify any additional marketing efforts Duke Kentucky considered using.

5. Refer to the Application, Appendix B, page 2. Regarding the Business Energy Saver Program, explain how Duke Kentucky is anticipating a 379 percent increase, or \$138,944, in Shared Savings as compared to the actual Shared Savings of approximately \$37,051 for the period 2022-2023.

6. Refer to the Application, pages 10–13.

a. Provide the benchmark review from ESource in regard to reviewing the tiered incentives. Include in the response other jurisdictions or utilities that offer a Peak Time Rebate DSM Program, or something similar, and their program characteristics compared to Duke Kentucky.

b. Explain how offering incentive credits at higher levels may make cost-effectiveness challenging to achieve if participant count also increases.

c. If possible, provide an approximation for how many participants Duke Kentucky would need to make the Peak Time Rebate program cost-effective.

d. Provide a breakdown of the proposed budget increase for the Peak Time Rebate program.

e. Provide the projected impact on customer participation expected to result from increasing the PTR Pilot Program tiered incentive credits to \$1.00, \$1.25, \$1.50. Include in the response how Duke Kentucky anticipates a \$0.25 difference in tiers to be significant enough to evoke customer participation.

7. Refer to the Application, page 13. Refer also to the Application, Appendix B, page 2. Reconcile the discrepancy between the proposed budget amounts for the PTR Program.

8. Refer to the Application, pages 14–15. Provide documentation supporting the calculation of the additional budget of \$77,000 to the PowerShare® program to conduct an Evaluation, Measurement and Verification evaluation, including any contracts, responses to requests for proposals, or workpapers.

9. Provide the number of participants for each current DSM program for 2022-2023 and for 2023-2024.



Linda C. Bridwell, PE
Executive Director
Public Service Commission
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DATED SEP 27 2024

cc: Parties of Record

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