

January 29, 2025

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 29 2025
PUBLIC SERVICE
COMMISSION

Re: *Sam Ollie Droganes v. Duke Energy Kentucky, Inc.* – **Case No. 2024-00123**

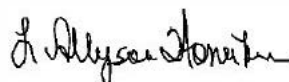
Dear Ms. Bridwell:

Please find attached for electronic filing with the Commission, Duke Energy Kentucky, Inc.'s Responses to Commission Staff's First 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 29, 2025. A copy of this filing was emailed and mailed via U.S. Mail on January 29, 2025 to the Complainant.

If you have any questions, please let me know.

Very truly yours,



L. Allyson Honaker

Enclosure

KyPSC Case No. 2024-00123
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VERIFICATION

STATE OF INDIANA)
)
) SS:
COUNTY OF HENDRICKS)

The undersigned, Brandi M. Williams, 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.

Brandi M Williams
Brandi M. Williams, Affiant

Subscribed and sworn to before me by Brandi M. Williams on this 28 day of January, 2025.



Tina Hemmelgarn
NOTARY PUBLIC

My Commission Expires: November 12, 2026

VERIFICATION

STATE OF OHIO)
) **SS:**
COUNTY OF HAMILTON)

The undersigned, James E. Ziolkowski, Director, Rates & Regulatory Planning, 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.



James E. Ziolkowski, Affiant

Subscribed and sworn to before me by James E. Ziolkowski on this 28th day of January, 2025.



NOTARY PUBLIC

My Commission Expires: July 8, 2027



EMILIE SUNDERMAN
Notary Public
State of Ohio
My Comm. Expires
July 8, 2027

**Duke Energy Kentucky
Case No. 2024-00123
STAFF First Set Data Requests
Date Received: January 17, 2025**

STAFF-DR-01-001

REQUEST:

Provide any and all documentation related to Complainant's application or request for Duke Kentucky to classify service address 207 Pike St. Covington, Kentucky 41011 as a "residence" subject to a residential rate, including, but not limited to, emails, site visit reports, and call recordings.

RESPONSE:

Please see STAFF-DR-01-001 Attachment.

PERSON RESPONSIBLE: Brandi M. Williams

207 / W Pike St / FL 1

Location Details Tickets Exceptions Other Premise Details Create/Change ZTMD Create Service Order Service Order Change/Cancel

Existing Comment:

nt email to MWConstruction to correct address.
[SS9 PP1SERVUSER 10/26/2023 13:34:52]
FR @ prem 102623 with owner,verified [REDACTED] @ 207 W.Pike, CovingtonKt, 41011, misc-1fl, (found vacant commerical
space notbeing used) comm rate still applies non-residential, update serviceaddress
[CSR SROBRIE 10/25/2023 08:45:47]
SERV: WALLACE 1226400

Primary Person Name:

[PREMIUM SPECIALTY

Primary Number / Extn:

[REDACTED]

Secondary Person Name:

Secondary Number / Extn:

Call Ahead:

Office Review:

Order History Close

**Duke Energy Kentucky
Case No. 2024-00123
STAFF First Set Data Requests
Date Received: January 17, 2025**

STAFF-DR-01-002

REQUEST:

Provide Duke Kentucky's written standard for determining whether a property is residential or commercial in character. If there is a policy related to such a determination, include the written policy in the response.

RESPONSE:

Please see STAFF-DR-01-002 Attachment.

PERSON RESPONSIBLE: Brandi M. Williams

DE All - Rate Change Process

Print

Description

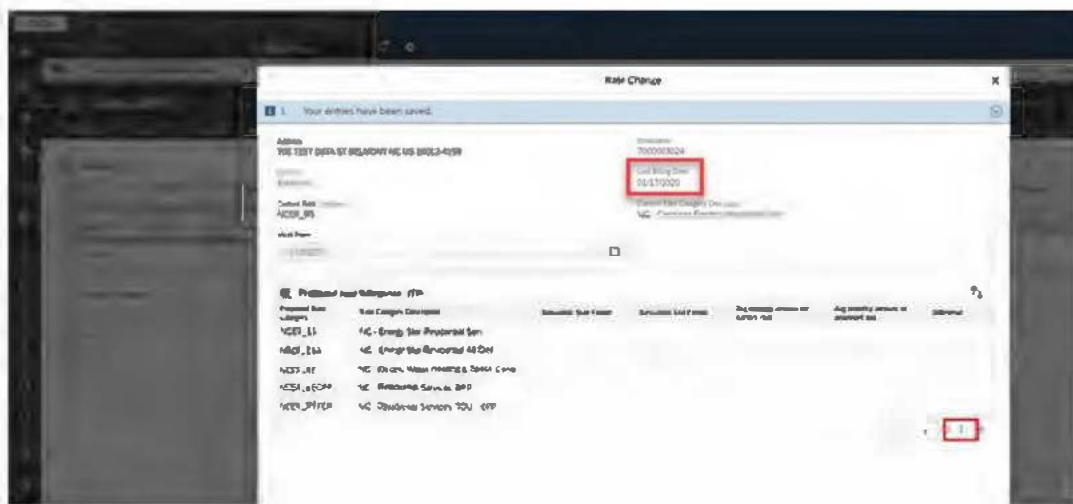
With the rollout of SAP and the Advanced Metering Infrastructure (AMI), meter exchanges are no longer required for most rate changes including TOU rates. When performing a rate change in C4C or ISU, SAP will assess the meter type and rate information to determine if a meter exchange is needed and will automatically generate a service order when required.

Work Process

NOTE: For rate changes from **Commercial to Residential**, submit a **Rate Change BPEM** and include any pertinent information (i.e., reason for change, etc.).

- Select **Utilities 360** facet
- Confirm the **Contract Account** and **Premise**
- Click **Utilities Rate Change** facet
- Click **Rate Change**
- The next screen shows the current information for the **Contract Account** and **Proposed Rate Categories**. Click the **right arrow** to see additional **Proposed Rate Categories**.

NOTE: The 'Valid From' date will default to the day after the 'Last Billing date'.



- **Select/highlight** the requested **Proposed Rate Category**
- Click **Rate Change** (bottom right); the rate will change in the system and a confirmation of the changes will appear at the top of the screen.
- If the requested rate is not listed under **Proposed Rate Categories**, submit a **Rate Change BPEM** to request the change

- If the rate can't be changed directly, the system will automatically create a BPEM with all the relevant details for the back office to complete.

 **NOTE:** Depending on the requested Rate Category, SAP will automatically assess the meter type and rate information to determine if a meter exchange is needed and will automatically generate a service order when required.

Solution Properties

Keywords

Rate Change TOU Time Use verification RATip

Solution ID

220406114113157

Last Modified Date

07/10/2024 01:18:38 PM

Taxonomy

- ▶ Rates > Work Processes

Collections

- ▶ DE Carolinas
- ▶ DE Florida
- ▶ DE Midwest
- ▶ DE Progress

Views

16363

**Duke Energy Kentucky
Case No. 2024-00123
STAFF First Set Data Requests
Date Received: January 17, 2025**

STAFF-DR-01-003

REQUEST:

Provide Duke Kentucky's process for reclassifying a property from commercial to residential for rate purposes. If there is a policy related to such an action, include the written policy in the response. Include in the response how the process is initiated.

RESPONSE:

Please see previously provided STAFF-DR-01-002 Attachment.

PERSON RESPONSIBLE: Brandi M. Williams

**Duke Energy Kentucky
Case No. 2024-00123
STAFF First Set Data Requests
Date Received: January 17, 2025**

STAFF-DR-01-004

REQUEST:

Provide the energy used, per kWh, by the Complainant for each month after the Complainant's request to reclassify the Complainant's property in October 2023.

RESPONSE:

Please see STAFF-DR-01-004 Attachment.

PERSON RESPONSIBLE: Brandi M. Williams

Sam Droganes
207 W Pike St
Floor 1
Covington, KY 41011

Premium Specialty	Bill Date:	Bill Period:	Electric Usage:	Gas Usage:
	10/16/2023	Sep 14 - Oct 12	62.523 kWh	8 CCF
	11/16/2023	Oct 13 - Nov 13	81.638 kWh	56 CCF
	12/15/2023	Nov 14 - Dec 12	296.202 kWh	174 CCF
	1/17/2024	Dec 13 - Jan 12	130.314 kWh	239 CCF
	2/16/2024	Jan 13 - Feb 13	174.219 kWh	280 CCF
	3/18/2024	Feb 14 - Mar 13	193.515 kWh	142 CCF
	4/15/2024	Mar 14 - Apr 11	192.858 kWh	87 CCF
	5/17/2024	Apr 12 - May 14	260.724 kWh	16 CCF
	7/2/2024	May 15 - Jun 12	186.560 kWh	7 CCF
	7/17/2024	Jun 13 - Jul 12	220.316 kWh	7 CCF
	7/19/2024	Jul 13 - Jul 16	35.065 kWh	1 CCF

Sam Droganes	8/15/2024	Jul 16 - Aug 13	251.348 kWh	6 CCF
	9/16/2024	Aug 14 - Sep 13	240.290 kWh	7 CCF
	10/15/2024	Sep 14 - Oct 11	206.479 kWh	8 CCF
	11/14/2024	Oct 12 - Nov 12	225.316 kWh	18 CCF
	12/13/2024	Nov 13 - Dec 11	260.271 kWh	196 CCF
	1/16/2025	Dec 11 - Jan 14	477.873 kWh	309 CCF

**Duke Energy Kentucky
Case No. 2024-00123
STAFF First Set Data Requests
Date Received: January 17, 2025**

STAFF-DR-01-005

REQUEST:

Based on the information provided in response to Item 4 above, calculate the Complainant's bills, for each billing period, based on a residential rate for the entire building from the date the Complainant's request was made until the date of this request. Consider this an ongoing request that should be updated each billing period. In the response, include the actual amount billed to Complainant as compared to the calculated amount as requested.

RESPONSE:

Please see STAFF-DR-01-005 Attachment for a recalculation of the Customer's bill for a residential rate, for each billing period, based on the information provided in response to Item 4.

The Company will update this request each billing period.

PERSON RESPONSIBLE: James E. Ziolkowski

Account	Account Number (last four digits)	Bill Date	For Service (dates)		Usage (kWh)	As Billed Electric Charges (Rate DS) ⁽¹⁾	Recalculated as Residential Electric Charges (Rate RS)	Difference
Premium Specialty		Oct 16, 2023	Sep 14, 2023	Oct 12, 2023	62.523	\$ 25.13	\$ 20.75	\$ 4.38
Premium Specialty		Nov 16, 2023	Oct 13, 2023	Nov 13, 2023	81.638	\$ 28.76	\$ 25.06	\$ 3.70
Premium Specialty		Dec 15, 2023	Nov 14, 2023	Dec 12, 2023	296.202	\$ 54.37	\$ 51.32	\$ 3.05
Premium Specialty		Jan 17, 2024	Dec 13, 2023	Jan 12, 2024	130.314	\$ 35.87	\$ 31.89	\$ 3.98
Premium Specialty		Feb 16, 2024	Jan 13, 2024	Feb 13, 2024	174.219	\$ 41.67	\$ 36.91	\$ 4.76
Premium Specialty		Mar 18, 2024	Feb 14, 2024	Mar 13, 2024	193.515	\$ 39.50	\$ 36.42	\$ 3.08
Premium Specialty		Apr 15, 2024	Mar 14, 2024	Apr 11, 2024	192.858	\$ 40.74	\$ 36.89	\$ 3.85
Premium Specialty		May 17, 2024	Apr 12, 2024	May 14, 2024	260.724	\$ 51.15	\$ 46.80	\$ 4.35
Premium Specialty		Jul 2, 2024	May 15, 2024	Jun 12, 2024	186.560	\$ 38.14	\$ 35.52	\$ 2.62
Premium Specialty		Jul 17, 2024	Jun 13, 2024	Jul 12, 2024	220.316	\$ 44.70	\$ 41.57	\$ 3.13
Premium Specialty - Final Bill		Jul 19, 2024	Jul 13, 2024	Jul 16, 2024	35.065	\$ 6.15	\$ 5.79	\$ 0.36
Sam Droganes		Aug 15, 2024	Jul 16, 2024	Aug 13, 2024	251.348	\$ 49.33	\$ 44.45	\$ 4.88
Sam Droganes		Sep 16, 2024	Aug 14, 2024	Sep 13, 2024	240.290	\$ 45.68	\$ 41.64	\$ 4.04
Sam Droganes		Oct 15, 2024	Sep 14, 2024	Oct 11, 2024	206.479	\$ 42.02	\$ 39.09	\$ 2.93
Sam Droganes		Nov 14, 2024	Oct 12, 2024	Nov 12, 2024	225.316	\$ 43.91	\$ 40.17	\$ 3.74
Sam Droganes		Dec 13, 2024	Nov 13, 2024	Dec 11, 2024	260.271	\$ 45.88	\$ 42.93	\$ 2.95
Sam Droganes		Jan 16, 2025	Dec 12, 2024	Jan 14, 2025	477.873	\$ 77.65	\$ 73.00	\$ 4.65
						\$ 710.65	\$ 650.20	\$ 60.45

Note:

⁽¹⁾ Actual amount billed in the 'Current Electric Charges' portion of the customer's bill. This amount does not include amounts in the: Other Charges and Credits, Deposits, Taxes, or Current Gas Charges sections of the bill.