



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

o: 513-287-4010
f: 513-370-5720

Larisa.Vaysman@duke-energy.com
Larisa M. Vaysman
Associate General Counsel

VIA EMAIL: PSCED@ky.gov

September 11, 2026

Mr. Justin McNeil
Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
Frankfort, Kentucky 40602-0615

RECEIVED

SEP 11 2026

**PUBLIC SERVICE
COMMISSION**

Re: Case No. 2026-00130

In the Matter of Nicolas Pangallo v. Duke Energy Kentucky, Inc.

Dear Mr. McNeil:

Duke Energy Kentucky, Inc. hereby submits electronically pursuant to 807 KAR 5:001, Section 8, its Initial Requests for Information to the Complainant in the above-captioned case.

I certify that the electronically filed documents are true and accurate copies of the original documents. A paper copy of this filing was mailed via U.S. Mail on September 11, 2026 to the Complainant.

Respectfully submitted,

/s/Larisa M. Vaysman

Larisa M. Vaysman (98944)
Associate General Counsel
Duke Energy Business Services LLC
139 East Fourth Street, 1303-Main
Cincinnati, Ohio 45202
Phone: (513) 287-4010
Fax: (513) 370-5720
E-mail: larisa.vaysman@duke-energy.com
Counsel for Duke Energy Kentucky, Inc.

Enclosures: As stated

Cc: Mr. Nicolas Pangallo (via regular mail)

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

NICOLAS PANGALLO	)	
	)	
COMPLAINANT	)	CASE NO.
	)	2026-00130
v.	)	
	)	
DUKE ENERGY KENTUCKY, INC.	)	
	)	
DEFENDANT	)	

**DUKE ENERGY KENTUCKY, INC.’S INITIAL REQUESTS FOR
INFORMATION TO THE COMPLAINANT, NICOLAS PANGALLO**

Comes now Duke Energy Kentucky, Inc. (Duke Energy Kentucky or the Company), and addresses the following Initial Requests for Information to the Complainant, Nicolas Pangallo (Pangallo) to be answered by the date specified in the Commission’s Order of Procedure, and in accordance with the following instructions:

I. DEFINITIONS AND INSTRUCTIONS

1. With respect to each discovery request, all information is to be divulged that is within the knowledge, possession, or control of the parties to whom it is addressed, including their agents, employees, advisors, consultants, attorneys, and/or investigators.

Each request is addressed to Nicolas Pangallo unless otherwise stated.

2. Please identify the witness(es) who will be prepared to answer questions concerning each request.

3. These requests shall be deemed continuing so as to require further and

supplemental responses if the company receives or generates additional information within the scope of these requests between the time of the response and the time of any hearing conducted hereon.

4. All answers must be separately and fully stated in writing under oath.

5. Where a data request calls for an answer in more than one part, each part should be separated in the answer so that the answer is clearly understandable.

6. If any request appears confusing, please request clarification directly from counsel for Duke Energy Kentucky.

7. For purpose of these discovery requests, the following terms shall have meanings set forth below:

- (a) As used herein, “document,” “documentation” and/or “record,” whether stated as the singular or the plural, means any course of binders, book, pamphlet, periodical, letter, correspondence, memoranda, including but not limited to, any memorandum or report of a meeting or telephone or other conversation, invoice, account, credit memo, debit memo, financial statement, general ledger, ledger, journal, work papers, account work papers, report, diary, telegram, record, contract, agreement, study, draft, telex, handwritten or other note, sketch, picture, photograph, plan, chart, paper, graph, index, tape, data processing card, data processing disc, data cells or sheet, check acceptance draft, e-mail, studies, analyses, contracts, estimates, summaries, statistical statements, analytical records, reports and/or summaries of investigations, opinions or reports of consultants,

opinions or reports of accountants, trade letters, comparisons, brochures, pamphlets, circulars, bulletins, notices, forecasts, electronic communication, printouts, all other data compilations from which information can be obtained (translated if necessary by defendants into usable form), any preliminary versions, drafts or revisions of any of the foregoing, and/or any other written, recorded, transcribed, punched, taped, filmed or graphic matter, however produced or reproduced and regardless of origin or location, in the possession, custody and/or control of the defendant and/or their agents, accountants, employees, representatives and/or attorneys. “Document” and “record” also mean all copies of documents by whatever means made, if the copy bears any other markings or notations not found on the original.

- (b) The terms “relating to,” “referring to,” “referred to,” “pertaining to,” “pertained to” and “relates to” means referring to, reporting, embodying, establishing, evidencing, comprising, connected with, commenting on, responding to, showing, describing, analyzing, reflecting, presenting and/or constituting and/or in any way involving.
- (c) The terms “and,” “or,” and “and/or” within the meaning of this document shall include each other and shall be both inclusive and disjunctive and shall be construed to require production of all documents, as above-described, in the broadest possible fashion and manner.

- (d) Unless otherwise noted, the term “Complainant” shall mean Nicolas Pangallo. The term “you” shall be deemed to refer to Nicolas Pangallo.
- (e) The term “Commission” shall mean the Kentucky Public Service Commission.
- (f) The term “Duke Energy Kentucky” shall mean Duke Energy Kentucky, Inc., its employees, agents, officers, directors, and representatives.
- (g) To “identify” shall mean:
 - (1) With respect to a document, to state its date, its author, its type (for example, letter, memorandum, chart, photograph, sound reproduction, etc.), its subject matter, its present location, and the name of its present custodian. The document may be produced in lieu of supplying the foregoing information. For each document which contains information as privileged or otherwise excludable from discovery, there shall be included a statement as to the basis for such claim of privilege or other grounds for exclusion.
 - (2) With regard to a natural person, to state his or her full name, last known employer or business affiliation, title, and last known home address.
 - (3) With regard to a person other than a natural person, state the title of that person, any trade name, or corporate name or

partnership name used by that person, and the principal business address of that person.

- (h) To “produce” or to “identify and produce,” shall mean that Complainant shall produce each document or other requested tangible thing. For each tangible thing which Complainant contends is privileged or otherwise excludable from discovery, there shall be included a statement as to the basis for such claim of privilege or other grounds for exclusion.
- (i) The terms “Party or Parties” shall mean any organization, person, corporation, entity, etc., which intervened in the above-captioned proceeding and shall further include the Kentucky Public Service Commission Staff.

II. REQUESTS FOR INFORMATION

1. On page 4 of the Complaint filed on May 18, 2026, in this proceeding, Complainant states “The following analysis uses temperature data recorded on Duke Energy's own bills to calculate expected gas consumption based on the customer's established usage pattern,” and provides a table which includes an “Expected CCF” column. Please produce all supporting workpapers, calculations, spreadsheets, files, or other documents supporting the calculation of the “Expected CCF.”

2. Please produce all records of heating and/or thermostat settings at 2751 Alexandria Avenue, Latonia, KY, 41015 (the Premises), from January 1, 2023, until present.

3. Please identify all residents at the Premises at any time from January 1, 2023, until present, and state dates of residence for each resident identified.

4. Please state if the resident(s) of the Premises were employed outside of the home between January 1, 2023, and present, and state the dates of such employment and location of employment for every resident.

5. Please state if any other persons, besides Mr. Pangallo and any residents listed in response to Request for Information No. 3, spent more than 20 hours per week at the Premises between January 1, 2023, and the present, and state the time period(s) during which such persons spent more than 20 hours per week at the Premises.

6. Please state if any construction was performed at and/or on the Premises from January 1, 2023, to the present and describe such construction, if any.

7. Please state the make and model of any furnace(s) at the Premises between January 1, 2023, and the present, and state the dates of installation and/or removal for each furnace.

8. For each furnace identified in response to Request for Information No. 9, please state the dates of all filter replacements since January 1, 2023. If no filters have been replaced on a furnace since January 1, 2023, state the date of the most recent filter replacement.

9. Please state the make and model of any water heater(s) at the Premises between January 1, 2023, and the present, and the dates of installation and/or removal.

10. Please state the make and model of any dishwasher(s) at the Premises between January 1, 2023, and the present, and the dates of installation and/or removal.

11. Please state the make and model of any whirlpool and/or hot tub(s) at the Premises between January 1, 2023, and the present, and the dates of installation and/or removal.

12. Please state the make and model of any oven(s) at the Premises between January 1, 2023, and the present, and the dates of installation and/or removal.

13. Please state the make and model of any pool(s) at the Premises between January 1, 2023, and the present, and the dates of installation and/or removal.

14. Please state the make and model of any washing machine(s) at the Premises between January 1, 2023, and the present, and the dates of installation and/or removal.

15. Please state the make and model of any dryer(s) at the Premises between January 1, 2023, and the present, and the dates of installation and/or removal.

16. Please state the make and model of any gas fireplace at the Premises between January 1, 2023, and the present, and the dates of installation and/or removal.

17. Please state the make and model of any gas grill(s) at the Premises between January 1, 2023, and the present, and the dates of installation and/or removal.

18. Please state the age of any building(s) at the Premises.

19. Please state the make and model of any thermostat(s) at the Premises between January 1, 2023, and the present, and the dates of installation and/or removal.

20. For any of the furnace(s), water heater(s), dishwasher(s), whirlpool(s), hot tub(s), oven(s), pool(s), washing machine(s), gas fireplace(s), dryer(s), or gas grill(s) identified in response to Requests for Information No.'s 7 to 19, please state if any repairs occurred between January 1, 2023, and present, describe each identified repair, and produce any records related to each repair identified.

Respectfully submitted,

DUKE ENERGY KENTUCKY, INC.

/s/Larisa M. Vaysman

Rocco O. D'Ascenzo (92796)

Deputy General Counsel

Larisa M. Vaysman (98944)

Associate General Counsel

Sheena McGee Leach (100598)

Staff Attorney

Duke Energy Business Services LLC

139 East Fourth Street, 1303-Main

Cincinnati, Ohio 45202

Phone: (513) 287-4010

Fax: (513) 370-5720

rocco.d'ascenzo@duke-energy.com

larisa.vaysman@duke-energy.com

sheena.mcgee@duke-energy.com

Counsel for Duke Energy Kentucky, Inc.

CERTIFICATE OF SERVICE

This is to certify that a true and accurate copy of the foregoing has been emailed to the Kentucky Public Service Commission at PSCED@ky.gov. In addition, a true and accurate copy of the foregoing was placed in the U.S. mail, postage prepaid, on September 11, 2026, addressed to the following:

Nicolas Pangallo
2751 Alexandria Avenue
Latonia, Kentucky 41015

/s/Larisa M. Vaysman

Counsel, Duke Energy Kentucky, Inc.