

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC ANNUAL COST RECOVERY)	CASE NO.
FILING FOR DEMAND SIDE MANAGEMENT BY)	2021-00424
DUKE ENERGY KENTUCKY, INC.)	

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

Duke Energy Kentucky, Inc. (Duke Kentucky), pursuant to 807 KAR 5:001, is to file with the Commission an electronic version of the following information. The information requested is due on December 13, 2021. 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 when made or, though correct when made, is now incorrect 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 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, paragraph 3.
 - a. Provide all comments submitted by the Collaborative to Duke Kentucky regarding the instant Application.
 - b. Provide the slides and agenda from the October 20, 2021 Collaborative meeting.

2. Refer to the Application, paragraph 16. Also, refer to Case No. 2020-00371,² Application, paragraph 16. Explain whether the reduction in Load Impacts Achieved from 21,255,939 kWh in fiscal year July 2019-June 2020 to 10,962,635 kWh in fiscal year July 2020-June 2021 is solely a consequence of the COVID-19 restrictions. If not, what other factors were involved in the decrease in load impacts achieved.

3. Refer to the Application, paragraph 32. Explain whether or not the Multi-Family Program is still suspended due to COVID-19 pandemic. If it is not, provide the start date.

4. Refer to Application, paragraph 39. Explain whether the trend of a declining number of customers served in the last decade indicates that Duke Kentucky needs to adjust the customer qualification specifications.

5. Refer to the Application, paragraph 74. Explain why five customers left the Call Option Peak Load Program in June 2021.

6. Refer to the Application, paragraph 81. Duke Kentucky notes that it is collaborating with organizations to rally around efforts of the Neighborhood Energy Saver Program. Provide an update of the program and changes implemented due to COVID-19 pandemic.

7. Refer to the Application, paragraph 82. Provide an update of the cost effective scores for the proposed additional measures to the Neighborhood Energy Saver Program.

² Case No. 2020-00371, *Electronic Annual Cost Recovery Filing for Demand Side Management by Duke Energy Kentucky Inc.*, (filed Nov. 16, 2020) Application.

8. Refer to the Application, paragraph 87. Explains why all aspects of the Small Business Energy Saver Program are administered by a single company-authorized vendor.

9. Refer to the Application, paragraph 107. Explain why Resource Innovations believes that the cleanest approach is to recruit two new groups of program participants.

10. Refer to the Application, Appendix B, page 2 of 7. Also refer to Case No. 2021-00313,³ Application, Appendix B, page 2 of 7, the 2021-2022 Projected Program Costs, Lost Revenues, and Shared Savings.

a. In Case No. 2021-00313, the proposed budget for 2021-2022 for the Low Income Neighborhood Program, including the proposed and yet approved modifications, is \$535,375. In the instant case the proposed budget is \$503,214. Explain why the budget is smaller for the 2022-2023 project year.

b. In Case No. 2021-00313, the proposed budget for 2021-2022 for the Residential Smart Saver Program is \$1,009,464, including the proposed and yet approved modifications. In the instant case, the proposed budget is \$1,192,589. Explain the increase in the budget for the 2022-2023 project year.

c. In Case No. 2021-00313, the proposed budget for 2021-2022 for the Power Manger Program is \$702,947. In the instant case, the proposed budget is \$855,519. Explain the increase in the budget for the 2022-2023 project year.

d. Regarding the Peak Time Rebate Pilot Program costs:

³ Case No. 2021-00313, *Electronic Application of Duke Energy Kentucky, Inc. to Amend Its Demand Side Management Programs* (filed, Aug.16, 2021) Application.

(1) Provide the individual costs for the proposed \$216,257 program cost.

(2) In Case No. 2021-00313, the proposed budget for 2021-2022 for the Peak Time Rebate Program is \$197,549. In the instant case, the proposed budget is \$216,257. Explain the increase in costs from the 2021-2022 projected costs.

(3) Refer to the Application Appendix F, page 9 of 10. Explain if the cost of the Proposed Pilot Incentive Test is included in the 2022-2023 budget. If it is not, explain how Duke Kentucky will account for the program costs.

e. In Case No. 2021-00313, the proposed budget for 2021-2022 for the Small Business Energy Saver Program is \$827,238. In the instant case, the proposed budget is \$771,723. Explain the decrease in costs from the 2021-2022 projected costs.

f. In Case No. 2021-00313, the proposed budget for 2021-2022 for the Smart Saver Non-Residential Custom and Prescriptive Programs is \$1,443,155. In the instant case, the proposed budget is \$1,218,433. Explain the decrease in costs from the 2021-2022 projected costs.



Linda C. Bridwell, PE
Executive Director
Public Service Commission
P.O. Box 615
Frankfort, KY 40602

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cc: Parties of Record

*Debbie Gates
Duke Energy Kentucky, Inc.
139 East Fourth Street
Cincinnati, OH 45201

*Duke Energy Kentucky, Inc.
139 East Fourth Street
Cincinnati, OH 45202

*Larisa Vaysman
Duke Energy Kentucky, Inc.
139 East Fourth Street
Cincinnati, OH 45201

*Minna Sunderman
Duke Energy Kentucky, Inc.
139 East Fourth Street
Cincinnati, OH 45201