

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF DUKE)	
ENERGY KENTUCKY, INC. FOR AN)	CASE NO.
ADJUSTMENT TO RIDER ASRP RATES)	2018-00198
AND FOR TARIFF APPROVAL)	

COMMISSION STAFF'S SECOND 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 the original in paper medium and an electronic version of the following information. The information requested herein is due within 14 days of the entry of this Request for Information. Responses to requests for information in paper medium shall be appropriately bound, tabbed, and indexed. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked. Each response 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 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 it obtains information which indicates that 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, it shall provide a written explanation of the specific grounds for its failure to respond completely and precisely.

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 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 Duke Kentucky's response to Commission Staff's First Request for Information (Staff's First Request), Item 1. Duke Kentucky asserts that the total cost of the Accelerated Service Line Replacement Program (ASRP) has risen from approximately \$34 million–\$38 million to \$42.3 million due to the amount of service lines needing replaced increasing to an estimated 11,574 service lines.

a. Provide the initial number of service lines that Duke Kentucky proposed to replace under the ASRP project in Case No. 2015-00210.¹

b. Explain why the projected service line replacements have increased.

2. Refer to Duke Kentucky's response to Staff's First Request, Item 2.

¹ Case No. 2015-00210, *Application of Duke Energy Kentucky, Inc. for a Certificate of Public Convenience and Necessity Authorizing the Implementation of an Accelerated Service Line Replacement Program, Approval of Ownership of Service Lines, and a Gas Pipeline Replacement Surcharge* (Ky. PSC Feb. 2, 2016).

- a. Explain in full detail why the cost per service line increased from approximately \$2,647 in 2016 to \$4,156 in 2017.
- b. Explain in full detail why the cost per service line decreased from \$4,156 in 2017 to \$3,652 for January 1, 2018–July 31, 2018.
- c. Provide evidentiary support for Duke Kentucky's 2018 and 2019 projected estimated cost of \$3,652 per service line.



Gwen R. Pinson
Executive Director
Public Service Commission
P.O. Box 615
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DATED SEP 14 2018

cc: Parties of Record

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