

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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| ELECTRONIC APPLICATION OF DUKE ENERGY) | |
| KENTUCKY, INC. FOR A CERTIFICATE OF) | CASE NO. |
| PUBLIC CONVENIENCE AND NECESSITY) | 2022-00084 |
| AUTHORIZING THE PHASE ONE) | |
| REPLACEMENT OF THE AM07 PIPELINE) | |

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 May 23, 2022. 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 plans and specifications appended to the Application.
 - a. Identify any alternative designs or materials that could be used to comply with federal regulations.
 - b. Provide the estimated costs and useful lives of alternative pipeline designs or materials identified in the response to 1(a) above.
2. Refer to the Application, paragraph 6.

a. Provide what “modern materials” the new pipelines will be constructed of, and how they differ from the current pipelines they will be replacing.

b. Provide the life expectancy of the new pipelines to be installed, and how long Duke Kentucky anticipates the new system to remain in service before other replacements or upgrades will be required through the filing of a future Certificate of Public Convenience and Necessity (CPCN).

3. Refer to the Application, paragraph 16.

a. Provide support for the annual ongoing cost of operation of less than \$10,000 after the Project’s completion.

b. Provide the expected annual costs of the required periodic inspections or testing that were not included in the estimated annual cost of operation of less than \$10,000.

4. Refer to the Direct Testimony of Bran R. Weisker (Weisker Testimony), page 5, lines 9–10. Mr. Weisker states that A.O. Smith pipe has a long history of failures due to hard spots in the pipe body along with failures on the longitudinal seam. Provide a published report or study supporting this statement.

5. Refer to the Weisker Testimony, page 5, lines 17–21. Explain how replacing the pipe results in the need to also replace any associated regulator stations.

6. Refer to the Weisker Testimony, page 6, the table at line 8. Given the recent surge in inflation and supply chain issues, explain whether Duke Kentucky anticipates a change to the proposed budget.

7. Refer to the Weisker Testimony, page 7, lines 3–4. For the current pipeline that will be abandoned, provide the following:

- a. Explain why Duke Kentucky is proposing to abandon a portion of the pipeline.
- b. Provide the total amount Duke Kentucky is proposing to abandon.
- c. Explain the environmental impact of the abandonment.
- d. Explain whether there is a cost-benefit analysis for removal of the portion of the abandoned pipeline

8. Refer to the Weisker Testimony, page 8, line 14–18. Regarding the pressure testing, explain why Duke Kentucky is not proposing to by-pass the current pipe to pressure test and instead replace the pipeline. Provide a cost-benefit analysis supporting Duke Kentucky’s decision.

9. Refer to the Weisker Testimony, page 9, lines 7. Provide a list of all Duke Kentucky pipelines that are currently using In Line Inspection tools for integrity reassessment.

10. Refer to the Direct Testimony of Bradley A. Seiter (Seiter Testimony), page 4, lines 1–2. Explain whether or not the new pressure regulating station is included in the Phase One budget.

11. Refer to the Seiter Testimony, page 4, lines 11–23 and page 5, lines 1–5. Provide an update to all the applied for permits.

12. Refer to the Seiter Testimony, page 6, lines 2–6. Provide the amount for which Duke Kentucky has budgeted for these anticipated deviations from the workplan and if these costs are included in the contingency budget amount.



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

DATED MAY 19 2022

cc: Parties of Record

Case No. 2022-00084

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

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

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

*Rocco O D'Ascenzo
Duke Energy Kentucky, Inc.
139 East Fourth Street
Cincinnati, OH 45201