

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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 FOURTH 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 November 18, 2022. The Commission directs Duke Kentucky to the Commission's July 22, 2021 Order in Case No. 2020-00085<sup>1</sup> 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

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<sup>1</sup> 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 testimony of Brian R. Wesker, pages 4-5, lines 11-21, 1-5. State verbatim and cite any language in CFR Part 192 that requires replacement or retrofitting of existing pipeline to accommodate an in-line inspection (ILI) tool.

2. Refer to Duke Kentucky's response to Commission Staff's Third Request for Information (Staff's Third Request), Item 1(c). State whether pressure testing without retrofitting for use of an ILI tool would result in excavation or replacement work.

3. Refer to Duke Kentucky's response to Staff's Third Request, Item 1(a).

a. State the estimated cost of pressure testing the existing AM07 pipeline without retrofitting for use of an ILI tool. Itemize these costs by costs of testing, bypassing, temporary gas supply, excavation, and correcting deficiencies found during testing.

b. Provide any documentation or other information used to determine the estimated cost stated in response to Item 3(a) above.

c. Provide a cost-benefit analysis of the proposed pipeline replacement, including capital cost, depreciation, and future testing costs for the life of the new pipeline and a cost-benefit analysis of pressure testing existing pipeline **without** retrofitting for use of an ILI tool for the same period of time.



Linda C. Bridwell, PE  
Executive Director  
Public Service Commission  
P.O. Box 615  
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DATED   OCT 26 2022  

cc: Parties of Record

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