

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF:

APPLICATION OF DUKE ENERGY KENTUCKY, )  
INC., FOR A CERTIFICATE OF PUBLIC )  
CONVENIENCE AND NECESSITY AUTHORIZING )  
THE IMPLEMENTATION OF AN ACCELERATED )  
SERVICE LINE REPLACEMENT PROGRAM, ) Case No. 2015-00210  
APPROVAL OF OWNERSHIP OF SERVICE LINES, )  
AND A GAS PIPELINE REPLACEMENT SURCHARGE )

**ATTORNEY GENERAL'S INITIAL DATA REQUESTS**

Comes now the intervenor, the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention, and submits these Initial Data Requests to Duke Energy Kentucky, Inc. [hereinafter referred to as "DEK"] to be answered by the date specified in the Commission's Order of Procedure, and in accord with the following:

- (1) In each case where a request seeks data provided in response to a staff request, reference to the appropriate request item will be deemed a satisfactory response.
- (2) Please identify the witness who will be prepared to answer questions concerning each request.
- (3) Please repeat the question to which each response is intended to refer. The Office of the Attorney General can provide counsel for DEK with an electronic version of these questions, upon request.
- (4) 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.

(5) Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association, be accompanied by a signed certification of the preparer or 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.

(6) If you believe any request appears confusing, please request clarification directly from Counsel for the Office of Attorney General.

(7) To the extent that the specific document, workpaper or information as requested does not exist, but a similar document, workpaper or information does exist, provide the similar document, workpaper, or information.

(8) To the extent that any request may be answered by way of a computer printout, please identify each variable contained in the printout which would not be self-evident to a person not familiar with the printout.

(9) If the company has objections to any request on the grounds that the requested information is proprietary in nature, or for any other reason, please notify the Office of the Attorney General as soon as possible.

(10) As used herein, the words "document" or "documents" are to be construed broadly and shall mean the original of the same (and all non-identical copies or drafts thereof) and if the original is not available, the best copy available. These terms shall include all information recorded in any written, graphic or other tangible form and shall include, without limiting the generality of the foregoing, all reports; memoranda; books or

notebooks; written or recorded statements, interviews, affidavits and depositions; all letters or correspondence; telegrams, cables and telex messages; contracts, leases, insurance policies or other agreements; warnings and caution/hazard notices or labels; mechanical and electronic recordings and all information so stored, or transcripts of such recordings; calendars, appointment books, schedules, agendas and diary entries; notes or memoranda of conversations (telephonic or otherwise), meetings or conferences; legal pleadings and transcripts of legal proceedings; maps, models, charts, diagrams, graphs and other demonstrative materials; financial statements, annual reports, balance sheets and other accounting records; quotations or offers; bulletins, newsletters, pamphlets, brochures and all other similar publications; summaries or compilations of data; deeds, titles, or other instruments of ownership; blueprints and specifications; manuals, guidelines, regulations, procedures, policies and instructional materials of any type; photographs or pictures, film, microfilm and microfiche; videotapes; articles; announcements and notices of any type; surveys, studies, evaluations, tests and all research and development (R&D) materials; newspaper clippings and press releases; time cards, employee schedules or rosters, and other payroll records; cancelled checks, invoices, bills and receipts; and writings of any kind and all other tangible things upon which any handwriting, typing, printing, drawings, representations, graphic matter, magnetic or electrical impulses, or other forms of communication are recorded or produced, including audio and video recordings, computer stored information (whether or not in printout form), computer-readable media or other electronically maintained or transmitted information regardless of the media or format in which they are stored, and all other rough drafts, revised drafts (including all handwritten

notes or other marks on the same) and copies of documents as hereinbefore defined by whatever means made.

(11) For any document withheld on the basis of privilege, state the following: date; author; addressee; indicated or blind copies; all persons to whom distributed, shown, or explained; and, the nature and legal basis for the privilege asserted.

(12) In the event any document called for has been destroyed or transferred beyond the control of the company, please state: the identity of the person by whom it was destroyed or transferred, and the person authorizing the destruction or transfer; the time, place, and method of destruction or transfer; and, the reason(s) for its destruction or transfer. If destroyed or disposed of by operation of a retention policy, state the retention policy.

(13) Please provide written responses, together with any and all exhibits pertaining thereto, in one or more bound volumes, separately indexed and tabbed by each response, in compliance with Kentucky Public Service Commission Regulations.

Respectfully submitted,

JACK CONWAY  
ATTORNEY GENERAL



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*Certificate of Service and Filing*

Counsel certifies that: (a) the foregoing is a true and accurate copy of the same document being filed in paper medium; (b) pursuant to 807 KAR 5:001, Section 8(7)(c), there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and (c) the original and copy in paper medium is being filed with the Commission on Sept. 4<sup>th</sup>, 2015.

I further certify that in accordance with 807 KAR 5:001 § 4 (8), the foregoing is being contemporaneously provided via electronic mail to:

Hon. Rocco O D'Ascenzo  
[Rocco.D'Ascenzo@duke-energy.com](mailto:Rocco.D'Ascenzo@duke-energy.com)  
Hon. David S. Samford  
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this 3<sup>rd</sup> day of September, 2015



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Lawrence W. Cook  
Assistant Attorney General

**Attorney General's Initial Data Requests**

1. Please confirm that if DEK's Accelerated Service Line Replacement Program (ASRP) is approved, it will own all service lines that are to be replaced under the ASRP.
  - a. Please confirm that under the ASRP, if approved, for services qualifying for the program, the company will replace that segment of the line from curb to meter, and where necessary, from main to curb, as well.
  - b. With regard to the service lines that were replaced under the company's now-completed AMRP program, please state who owns those lines.
  - c. With regard to service lines not falling under the proposed ASRP, does the company plan on assuming ownership and if so, when?
2. Please confirm that regardless of whether DEK's proposed ASRP is approved, DEK owns all service line risers in its gas service territory.
3. Please confirm that DEK's proposed ASRP, if approved, would not involve either inspection or replacement of service line risers.
4. If DEK's proposed ASRP is approved, please state whether inspection of all service lines and risers will occur on the same schedule. If not, please identify the inspection schedule(s).
5. Please confirm that DEK does not intend that the ASRP, if approved, will replace all service lines not already replaced under the now-completed AMRP.
6. Reference the application, p. 3, footnote 2. The hyperlink provided therein does not appear to be working, or may be inaccurate. Please provide an accurate and working hyperlink.
7. Reference the application, p. 3, numerical paragraph 5. Please identify the "detailed data analysis" DEK intends to use to identify and prioritize risks on its gas service system.
  - a. Please identify at what point a risk becomes "elevated," as stated in this same paragraph, and the criteria, if any, that make a risk "elevated."

**Attorney General's Initial Data Requests**

8. Reference the application, numerical paragraph 9, wherein DEK states that through the proposed ASRP, the company proposes to address pre-1971 vintage services not cathodically protected.
  - a. If DEK, whether through the inspection process or otherwise, should learn that slightly newer vintage services, regardless of whether they are cathodically protected, are also in need of replacement, will it replace those lines under the ASRP?
  - b. Will the primary criteria used to determine whether to replace a service be whether the company learns of the need during the anticipated 5-year lifespan of the program?
9. Reference the application, numerical paragraph 16. With regard to interior meters, will there be a higher incidence of service line replacement? Is the company aware of any correlation between customers having interior meters and the need for service line replacement under the ASRP?
10. Has DEK conducted any studies on the amount of savings, if any, it anticipates that will result from fewer interior meter readings, mandatory atmospheric corrosion inspections and leak surveys if the ASRP is approved? If so, please provide the results of those studies.
11. Has DEK conducted any studies on the amount of savings, if any, it anticipates that will result from fewer service line leaks if the ASRP is approved? If so, please provide the results of those studies.