

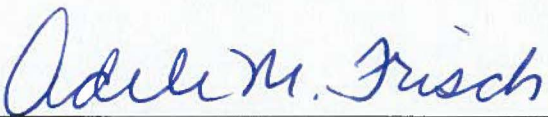
**VERIFICATION**

STATE OF OHIO                    )  
  )  
COUNTY OF HAMILTON        )        SS:

The undersigned, David A. Klein, Project Manager I, being duly sworn, deposes and says that he has personal knowledge of the matters set forth in the foregoing data requests and that the answers contained therein are true and correct to the best of his knowledge, information and belief.

  
\_\_\_\_\_  
David A. Klein, Affiant

Subscribed and sworn to before me by David A. Klein on this 20<sup>th</sup> day of August, 2018.

  
\_\_\_\_\_  
NOTARY PUBLIC

  
ADELE M. FRISCH  
Notary Public, State of Ohio  
My Commission Expires 01-05-2019

My Commission Expires: 1/5/2019


**VERIFICATION**

STATE OF OHIO                    )  
  )     SS:  
COUNTY OF HAMILTON         )

The undersigned, Sarah E. Lawler, Director of Rates & Regulatory Planning, being duly sworn, deposes and says that she has personal knowledge of the matters set forth in the foregoing data requests and that the answers contained therein are true and correct to the best of her knowledge, information and belief.

  
\_\_\_\_\_  
Sarah E. Lawler, Affiant

Subscribed and sworn to before me by Sarah E. Lawler on this 10<sup>th</sup> day of August, 2018.

  
\_\_\_\_\_  
NOTARY PUBLIC

My Commission Expires: July 8, 2022



**E. MINNA ROLFES-ADKINS**  
Notary Public, State of Ohio  
My Commission Expires  
July 8, 2022

**KyPSC Case No. 2018-00220**  
**TABLE OF CONTENTS**

<b><u>DATA REQUEST</u></b>	<b><u>WITNESS</u></b>	<b><u>TAB NO.</u></b>
STAFF-DR-01-001	David Klein Sarah Lawler .....	1
STAFF-DR-01-002	David Klein.....	2
STAFF-DR-01-003	Sarah Lawler .....	3
STAFF-DR-01-004	Legal .....	4

**Duke Energy Kentucky  
Case No. 2018-00198  
Staff First Set Data Requests  
Date Received: August 14, 2018**

**STAFF-DR-01-001**

**REQUEST:**

Refer to the February 2, 2016 Order in Case No. 2015-00210,<sup>1</sup> that approved Duke Kentucky's Accelerated Service Line Replacement Program (ASRP) and in which Duke Kentucky proposed that the ASRP program begin in 2016 and end in 2020 at a projected cost of \$50 million. Also refer to the December 16, 2016 Order in Case No. 2016-00228,<sup>2</sup> which states that based upon experience gained while performing filed reconnaissance, Duke Kentucky reduced the total projected cost of its ASRP from \$50 million to a range of \$34 to \$38 million. Confirm that Duke Kentucky still plans on completing the ASRP in 2020 and that the projected costs of \$34 to \$38 million are still accurate. If this cannot be confirmed, explain in full detail why not and provide an updated target date and the projected cost for the project.

**RESPONSE:**

The total cost of the project is now estimated to be approximately \$42.3 million. As a result of reconnaissance efforts, the amount of services needing to be replaced has increased to an estimated 11,574 services. The costs per renewal on average through the

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<sup>1</sup> 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 or Service Lines, and a Gas Pipeline Replacement Surcharge* (Ky. PSC Feb. 2, 2016).

<sup>2</sup> Case No. 2016-00228, *Application of Duke Energy Kentucky, Inc. for an Adjustment to Rider ASRP and for Tariff Approval* (Ky. PSC Dec. 16, 2016).

end of 2017 are approximately \$3,652. We expect this cost per renewal to be consistent for the remainder of the project. We expect the project to be complete by the end of 2019.

**PERSON RESPONSIBLE:** David Klein  
Sarah Lawler

**Duke Energy Kentucky  
Case No. 2018-00198  
Staff First Set Data Requests  
Date Received: August 14, 2018**

**STAFF-DR-01-002**

**REQUEST:**

Provide the actual number of service lines replaced by year since the inception of the ASRP program and the actual capital spending associated with the number of service lines replaced each year. Provide this information through the most recent month available for 2018. Provide the estimated service line replacements and capital spending by year for the remaining years of the ASRP project.

**RESPONSE:**

**2016** – 1,643 services renewed for \$4,349,410.16

**2017** – 3,285 services renewed for \$13,652,490.42

**2018 (1/1/2018 – 7/31/2018)** – 1,287 services renewed for \$4,701,385.26

**2018 (forecast 8/1/2018 – 12/31/2018)** – 2,333 services to renew for \$8,522,402.34

**2019 (forecast to complete to finish)** – 3,026 services to renew for \$11,053,917.40

**PERSON RESPONSIBLE:** David Klein

**Duke Energy Kentucky  
Case No. 2018-00198  
Staff First Set Data Requests  
Date Received: August 14, 2018**

**STAFF-DR-01-003**

**REQUEST:**

Refer to the Application, Exhibit 1, Schedule 2.4 titled O&M Meter Relocation. This schedule shows no projected operation and maintenance (O&M) expenses related to meter relocations during 2019.

- a. State whether Duke has already identified and relocated each meter eligible to be relocated under the ASRP.
- b. If not, explain why there are no projected O&M expenses related to meter relocations for 2019.

**RESPONSE:**

Any costs associated with meter relocation are included in the capital projections, thus there are no meter relocation O&M expenses.

**PERSON RESPONSIBLE:** Sarah Lawler

**Duke Energy Kentucky  
Case No. 2018-00198  
Staff First Set Data Requests  
Date Received: August 14, 2018**

**STAFF-DR-01-004**

**REQUEST:**

Provide a copy of the Exhibits to the Application in Excel format with all cells visible and unprotected, and all formulas intact.

**RESPONSE:**

The Company will upload these exhibits in Excel format to the online filing system.

**PERSON RESPONSIBLE:**          Legal