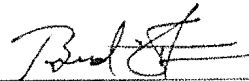


VERIFICATION

STATE OF OHIO)
) SS:
COUNTY OF HAMILTON)

The undersigned, Bradley A. Seiter, Sr. Project Manager, being duly sworn, deposes and says that he has personal knowledge of the matters set forth in the foregoing data requests, and that they are true and correct to the best of his knowledge, information, and belief.



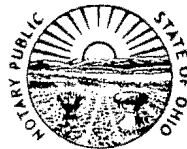
Bradley A. Seiter Affiant

Subscribed and sworn to before me by Bradley A. Seiter on this 30th day of September, 2022.



NOTARY PUBLIC

My Commission Expires: July 8, 2027



EMILIE SUNDERMAN
Notary Public
State of Ohio
My Comm. Expires
July 8, 2027

KyPSC Case No. 2022-00084
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Duke Energy Kentucky
Case No. 2022-00084
STAFF Third Set Data Requests
Date Received: September 8, 2022

STAFF-DR-03-001

REQUEST:

Refer to Commission Staff's First Request for Information (Staff's First Request), Item 8.

a. Provide a cost-benefit analysis for bypassing the current pipe to pressure test existing pipeline.

b. Explain why there is inadequate availability of temporary natural gas supply volumes necessary to support the customer load supplied off sections of pipeline removed from service in order to perform pressure testing.

c. State the estimated amount of time required to bypass the current pipe to pressure test existing pipeline.

d. State the estimated cost of correcting deficiencies found during the in-line inspection of the existing pipeline.

RESPONSE:

a. Retrofitting the existing pipeline to allow inline inspection, pressure testing, and providing temporary liquified natural gas (LNG) during pressure testing for the existing 4.5 miles of pipeline in the first phase would cost approximately \$33,875,000. This is assuming that an adequate supply of LNG would be available, which is unknown at this time, and that LNG supply would only be needed for approximately 2 months. In addition, it is estimated that an additional \$11,000,000 to \$14,500,000 would be spent for excavations and replacements as part of ILI inspections on the vintage pipe material that would not be required for a new pipeline.

b. While it is possible there is adequate LNG available to complete the work on the pipeline, it's operationally and financially risky to perform this alternative due to the unknown duration temporary gas could be needed. This work would only be feasible in the summer months when there is no heat load as it involves reducing the pressure by approximately half of AM07's typical operating pressure.

c. The AM07 Phase I pipeline would take approximately 2 months to take out of service, hydrotest, dry, and replace back in service. In this event, supplemental gas supply would be required to serve impacted customers during this outage. This duration does not take into consideration any additional excavation and replacement work that might be necessary.

d. As stated previously, it is estimated that an additional \$11,000,000 to \$14,500,000 would be spent for excavations and replacements as part of ILI inspections on the vintage pipe material that would not be required for a new pipeline.

PERSON RESPONSIBLE: Bradley A. Seiter

**Duke Energy Kentucky
Case No. 2022-00084
STAFF Third Set Data Requests
Date Received: September 8, 2022**

STAFF-DR-03-002

REQUEST:

Refer to Staff's First Request, Item 1.

- a. State whether Duke Kentucky considered obtaining an alternate gas feed for use during pressure testing of existing pipeline.
- b. State the feasibility of obtaining an alternate gas feed for use during pressure testing of existing pipeline.
- c. State the estimated cost of obtaining an alternate gas feed for use during pressure testing of existing pipeline.

RESPONSE:

- a. Yes.
- b. There are potential opportunities for providing temporary alternate feeds, however, as stated in response to STAFF-DR-03-001(b), there are operational and financial risks associated with this solution.
- c. The cost of the obtaining an alternate gas feed would be dependent on the amount of supplemental supply needed and the duration of time needed to provide gas while pressure testing work is being performed. Based on the system needs, it is estimated to cost between \$5 million and \$10 million for two months of support, depending on fuel costs at the time of use.

PERSON RESPONSIBLE: Brian R. Weisker

**Duke Energy Kentucky
Case No. 2022-00084
STAFF Third Set Data Requests
Date Received: September 8, 2022**

STAFF-DR-03-003

REQUEST:

State whether Duke Kentucky has plans or needs to build a redundant pipeline or alternate feed to serve the areas served by the AM07 pipeline.

RESPONSE:

There are currently no plans for an additional feed into these areas.

PERSON RESPONSIBLE: Brian R. Weisker

**Duke Energy Kentucky
Case No. 2022-00084
STAFF Third Set Data Requests
Date Received: September 8, 2022**

STAFF-DR-03-004

REQUEST:

State whether Duke Kentucky's proposed construction reduces the dependency on a single line being in service at all times.

RESPONSE:

No, the project would provide no additional redundancy.

PERSON RESPONSIBLE: Brian R. Weisker

**Duke Energy Kentucky
Case No. 2022-00084
STAFF Third Set Data Requests
Date Received: September 8, 2022**

STAFF-DR-03-005

REQUEST:

Explain whether Duke Kentucky evaluated replacing this pipeline without the additional expense associated with making it ILI accessible. If so, explain why Duke Kentucky opted to make the AM07 pipeline ILI accessible, especially since it is not a PHMSA requirement.

RESPONSE:

Duke Energy Kentucky did not evaluate replacing the pipeline without making it ILI accessible. It is required by 49 CFR § 192.150 that new transmission lines be designed and constructed to accommodate the passage of an ILI tool.

PERSON RESPONSIBLE: Brian R. Weisker

**Duke Energy Kentucky
Case No. 2022-00084
STAFF Third Set Data Requests
Date Received: September 8, 2022**

STAFF-DR-03-006

REQUEST:

Provide the incremental expense associated with making the AM07 pipeline ILI accessible.

RESPONSE:

Retrofit only costs to make the pipeline ILI accessible would be approximately \$19,125,000. This does not include pressure testing or the significant expected repair costs identified from an ILI inspection due to the age of the existing pipe material.

PERSON RESPONSIBLE: Bradley A. Seiter

**Duke Energy Kentucky
Case No. 2022-00084
STAFF Third Set Data Requests
Date Received: September 8, 2022**

STAFF-DR-03-007

REQUEST:

After the AM07 pipeline is in service, provide when it will need to be assessed for PHMSA reassessment.

RESPONSE:

Baseline assessment is due 10-years from the date the pipeline was installed per 192.921(g).

PERSON RESPONSIBLE: Brian R. Weisker