VERIFICATION

STATE OF NORTH CAROLINA)	
)	SS:
COUNTY OF MECKLENBURG)	

The undersigned, Denise Lepisto, Manager of Accounting, 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 her knowledge, information and belief.

Denise Lepisto Affiant

Subscribed and sworn to before me by Denise Lepisto on this 27 day of May, 2022.



NOTARY PUBLIC

My Commission Expires:

JULY 15, 2022

VERIFICATION

STATE OF)	
)	SS:
COUNTY OF)	

The undersigned, Jeremy Gibson, Supervisor Joint Use, 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.

Jeremy Gibson Affiant

Subscribed and sworn to before me by Jeremy Gibson on this \day of \day of \day.

NOTARY PUBLIC

My Commission Expires: July 8, 2022



EMILIE SUNDERMAN Notary Public State of Ohio My Comm. Expires July 8, 2022

VERIFICATION

STATE OF OHIO)	
)	SS:
COUNTY OF HAMILTON)	

The undersigned, Nick Melillo, Director Asset Management, 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.

Nick Melillo Affiant

Subscribed and sworn to before me by Nick Melillo on this 26th day of 2022,

NOTARY PUBLIC

My Commission Expires: July 8,2022

EMILIE SUNDERMAN Notary Public State of Ohio My Comm. Expires July 8, 2022

KyPSC Case No. 2022-00105 TABLE OF CONTENTS

DATA REQUEST	<u>WITNESS</u> <u>TA</u>	AB NO
STAFF-DR-02-001	Denise Lepisto	1
STAFF-DR-02-002	Nick Melillo	2
STAFF-DR-02-003	Nick Melillo	3
STAFF-DR-02-004	Jeremy Gibson	4
STAFF-DR-02-005	Jeremy Gibson	5

STAFF Second Set Data Requests

Date Received: May 19, 2022

STAFF-DR-02-001

REQUEST:

Refer to Duke Kentucky's response to Staff's First Request for Information, Item 6 and

Item 7. Provide the service lives of distribution poles used to determine the average service

life, by type and vintage, to the degree they are broken down.

RESPONSE:

The average service life of distribution poles is determined in a depreciation study. Each

pole does not have a separate life. The average service life provided in Item 6 was from the

last approved depreciation study for Duke Energy Kentucky. The calculation that

determines the average service life is performed by Gannett Fleming, the consulting firm

that performed the depreciation study. Please see STAFF-DR-02-001 Attachment which

contains the exhibits from the most recent depreciation study, approved in Case No. 2017-

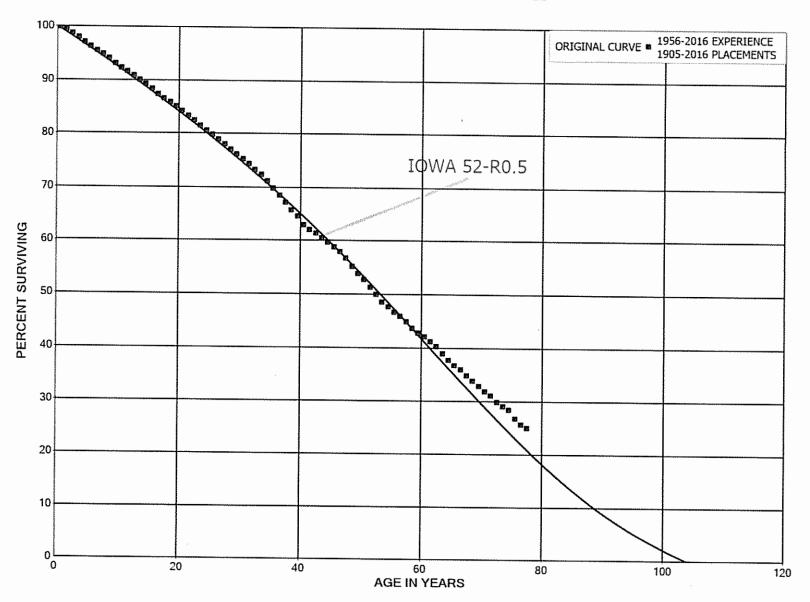
321. The Original Life Statistics were used in the calculation of the 52 year average service

life.

PERSON RESPONSIBLE:

Denise Lepisto

DUKE ENERGY KENTUCKY ACCOUNT 3640 POLES, TOWERS AND FIXTURES ORIGINAL AND SMOOTH SURVIVOR CURVES



DUKE ENERGY KENTUCKY

ACCOUNT 3640 POLES, TOWERS AND FIXTURES

ORIGINAL LIFE TABLE

PLACEMENT	BAND 1905-2016		EXPE	RIENCE BAN	D 1956-2016
AGE AT BEGIN OF	EXPOSURES AT BEGINNING OF	RETIREMENTS DURING AGE	RETMT	SURV	PCT SURV BEGIN OF
INTERVAL	AGE INTERVAL	INTERVAL	RATIO	RATIO	INTERVAL
0.0	81,654,470	107,104	0.0013	0.9987	100.00
0.5	79,196,996	374,598	0.0013	0.9953	99.87
1.5	72,207,655	505,244	0.0047	0.9930	99.40
2.5	64,533,286	506,229	0.0078	0.9922	98.70
3.5	56,383,958	525,417	0.0093	0.9907	97.93
4.5	50,786,030	377,959	0.0074	0.9926	97.01
5.5	49,784,851	401,428	0.0081	0.9919	96.29
6.5	48,277,332	354,083	0.0073	0.9927	95.52
7.5	46,375,276	392,197	0.0085	0.9915	94.82
8.5	46,074,634	487,486	0.0106	0.9894	94.01
9.5	44,397,354	356,714	0.0080	0.9920	93.02
10.5	42,438,288	282,967	0.0067	0.9933	92.27
11.5	40,931,448	386,881	0.0095	0.9905	91.66
12.5	39,814,609	313,723	0.0079	0.9921	90.79
13.5	38,698,855	338,166	0.0087	0.9913	90.07
14.5	38,299,579	387,900	0.0101	0.9899	89.29
15.5	37,261,409	398,615	0.0107	0.9893	88.38
16.5	35,873,006	318,503	0.0089	0.9911	87.44
17.5	34,249,325	291,696	0.0085	0.9915	86.66
18.5	32,481,728	299,037	0.0092	0.9908	85.92
19.5	30,986,575	318,046	0.0103	0.9897	85.13
20.5	29,283,277	288,892	0.0099	0.9901	84.26
21.5	27,324,927	297,632	0.0109	0.9891	83.43
22.5	25,182,834	317,894	0.0126	0.9874	82.52
23.5	23,099,944	246,959	0.0107	0.9893	81.48
24.5	21,220,773	215,024	0.0101	0.9899	80.61
25.5	19,651,625	200,146	0.0102	0.9898	79.79
26.5	18,466,542	221,087	0.0120	0.9880	78.98
27.5	16,544,269	199,094	0.0120	0.9880	78.03
28.5	15,637,811	176,727	0.0113	0.9887	77.09
29.5	14,364,530	168,568	0.0117	0.9883	76.22
30.5	13,417,961	175,255	0.0131	0.9869	75.33
31.5	12,517,174	179,716	0.0144	0.9856	74.34
32.5	11,703,613	140,166	0.0120	0.9880	73.27
33.5	10,860,873	185,615	0.0171	0.9829	72.40
34.5	9,989,362	183,581	0.0184	0.9816	71.16
35.5	9,037,489	180,082	0.0199	0.9801	69.85
36.5	7,949,050	149,628	0.0188	0.9812	68.46
37.5	7,194,385	155,868	0.0217	0.9783	67.17
38.5	6,578,961	106,613	0.0162	0.9838	65.72

STAFF Second Set Data Requests

Date Received: May 19, 2022

STAFF-DR-02-002

REQUEST:

Other than identifying specific defective poles through inspections that require

replacement, state whether Duke Kentucky has a policy or practice of replacing poles in a

circuit on a periodic basis or as they reach the end of their useful lives and, if so, describe

that policy or practice in detail, including how and when (e.g., how far in advance) such

replacements are identified or included in Duke Kentucky's projected capital spending

budget.

RESPONSE:

Duke Energy Kentucky does not have a policy or practice of replacing poles on a circuit

on a periodic basis or when they reach the end of their asset accounting useful lives.

PERSON RESPONSIBLE:

Nick Melillo

STAFF Second Set Data Requests

Date Received: May 19, 2022

STAFF-DR-02-003

REQUEST:

Describe Duke Kentucky's recent efforts, if any, to reduce the number of above-ground

transmission and distribution lines and identify the number of poles that have been

eliminated in Duke Kentucky's system in each of the last ten years because the electric

lines previously attached to those poles were placed underground.

RESPONSE:

Historically Duke Energy Kentucky has only replaced above-ground transmission and

distribution lines with underground lines in isolated cases, either driven by a specific

reliability issue, or a municipality's request to underground utilities for aesthetic purposes

(typically in a business district, and reimbursable by the municipality). Duke Energy

Kentucky does not track these projects separately, nor does Duke Energy Kentucky

separately track the number of poles that have been eliminated in these cases.

Duke Energy Kentucky does have one project planned for 2022 on the Donaldson 44 circuit

that will replace rear lot, heavily vegetated overhead lines with underground lines. This

project will improve reliability in this area and will eliminate 21 difficult to access

distribution poles.

PERSON RESPONSIBLE:

Nick Melillo

STAFF Second Set Data Requests

Date Received: May 19, 2022

STAFF-DR-02-004

REQUEST:

Provide an estimate of the average cost to perform a make-ready pole replacement, and

explain each basis for your response.

RESPONSE:

An estimate of the average amount for make ready in Kentucky is \$8,301.90. This

estimated average is based on work orders pulled from 2019-2021 that include pole change

outs as a part of the make ready. The estimate however is not based solely on pole change

outs as we do not track pole change out costs separately. The average amount provided

includes other electric make ready work that does not specifically involve a pole being

changed which could be for example, raising a street light, secondary, service, among other

things. The work orders related to the pole change outs are also not limited to a "clean"

pole in every scenario and do have factors that can cause the cost to increase significantly.

These factors include, but are not limited to, poles that are in a rear lot situation behind a

house or in an easement that is not easily accessible which would can require tree trimming,

path clearing or additional equipment that is not used for a pole that is sitting roadside,

poles that are required to be hand dug and hand set, poles where it is necessary to be set in

the very same place as the existing pole which requires multiple crews to manage (replace

in place), poles that are required to be brought up to code as a result of the work taking

place. These examples are just some of the factors that could be present above and beyond

the typical components that are a part of any normal "clean" pole replacement. Such typical

components include, but are not limited to, labor, materials, transferring of facilities,

flagging, tree trimming, permits, and taxes. Because of the many factors involved, the

costs of any single individual make ready may vary greatly from the average estimate

amount given above.

PERSON RESPONSIBLE:

Jeremy B. Gibson

Duke Energy Kentucky Case No. 2022-00105 STAFF Second Set Data Requests Date Received: May 19, 2022

PUBLIC STAFF-DR-02-005 (As to Attachments only)

REQUEST:

Provide any current joint use agreements.

RESPONSE:

CONFIDENTIAL PROPRIETARY TRADE SECRET (As to Attachments only)

Please see STAFF-DR-02-005 Confidential Attachments 1 through 8.

PERSON RESPONSIBLE: Jeremy B. Gibson

CONFIDENTIAL PROPRIETARY TRADE SECRET

STAFF-DR-02-005 CONFIDENTIAL ATTACHMENT 1 - 8

FILED UNDER SEAL