

VERIFICATION

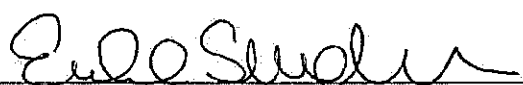
STATE OF OHIO)
) SS:
COUNTY OF HAMILTON)

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.



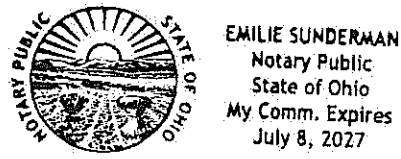
Bradley A. Seiter Affiant

Subscribed and sworn to before me by Bradley A. Seiter on this 13th day of September, 2022.



NOTARY PUBLIC

My Commission Expires: July 8, 2027



VERIFICATION

STATE OF OHIO)
)
COUNTY OF HAMILTON)

SS:

The undersigned, Lisa Steinkuhl, Director Rates & Reg 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 are true and correct to the best of her knowledge, information, and belief.



Lisa Steinkuhl Affiant

Subscribed and sworn to before me by Lisa Steinkuhl on this 13th 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

VERIFICATION

STATE OF *North Carolina*)
COUNTY OF *Mecklenburg*) SS:

The undersigned, Rodney Smith, Senior Tax Manager - EY, being duly sworn, deposes and says that he has personal knowledge of the matters set forth in the foregoing data requests and that it is true and correct to the best of his knowledge, information and belief.

Rodney Smith
Rodney Smith Affiant

Subscribed and sworn to before me by Rodney Smith on this *8th* day of *September* 2022.

KELLENA RORIE
NOTARY PUBLIC
Mecklenburg County, NC
My Commission Expires 08/21/2023

Kellena Rorie
NOTARY PUBLIC

My Commission Expires: *8/21/2023*

KyPSC Case No. 2022-00229
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Duke Energy Kentucky
Case No. 2022-00229
STAFF First Set Data Requests
Date Received: September 2, 2022

STAFF-DR-01-001

REQUEST:

Refer to the Application, page 3. Duke Kentucky states that the total cost of all phases of the AM07 pipeline is \$191.2 million. Also, refer to Case No. 2022-00084,¹ the Application, Exhibit 4, page 10, Duke Kentucky states that the total cost of all phases of the AM07 pipeline is \$181.3 million. Reconcile the discrepancy for the total cost of the project.

RESPONSE:

The total estimated costs of all phases of the AM07 pipeline is \$181.3 million as stated in Case No. 2022-00084. The cost of all phases of the AM07 per page 3 of the Application inadvertently used an earlier estimate from Case No. 2021-00190. The estimated costs were updated since the filing of the Company's natural gas rate case application in Case No. 2021-00190 and were reflected in the Company's application in Case No. 2022-00084.

PERSON RESPONSIBLE: Bradley A. Seiter

¹ Case No. 2022-00084, *Electronic Application of Duke Energy Kentucky, Inc. for a Certificate of Public Convenience and Necessity Authorizing the Phase One Replacement of the AM07 Pipeline* (filed March 29, 2022)

Duke Energy Kentucky
Case No. 2022-00229
STAFF First Set Data Requests
Date Received: September 2, 2022

STAFF-DR-01-002

REQUEST:

Refer to the Application, Exhibit 2, page 7 of 8. The total estimated capex is \$29.55 million. Also refer to Case No. 2022-00084, the Application page 5, paragraph 9, Duke Kentucky stated that the current estimated project cost for Phase One of the AM07 pipeline is \$32.25 million. Reconcile these estimated costs.

RESPONSE:

The estimated project cost of \$32.25 million is the total estimated project cost including contingency for Phase One of the AM07 pipeline regardless of when the spend will be placed in-service. The project is estimated to be placed in-service in September, 2023 but will have several months of post in-service trailing charges as the project winds down. Therefore, some of the Phase One charges will occur in the first quarter of 2024. The \$29.55 million is the estimated project costs for Phase One of AM07 placed in-service in 2023 in the Company's financial systems.

PERSON RESPONSIBLE: Bradley A. Seiter

**Duke Energy Kentucky
Case No. 2022-00229
STAFF First Set Data Requests
Date Received: September 2, 2022**

STAFF-DR-01-003

REQUEST:

Quantify and provide a list of all operational and maintenance savings Duke Kentucky will realize through the abandonment of the existing pipe and the rebuild. Explain whether this savings is included in the calculation of Rider PMM.

RESPONSE:

There will not be any material operational and maintenance (O&M) savings realized through the abandonment of the existing pipe and the rebuild. Any minimal savings will be offset by the minimal increase in O&M costs due to the new regulating facility.

Rider PMM does not include any savings or incremental O&M costs related to Phase 1 of the AM07 pipeline.

PERSON RESPONSIBLE: Bradley A. Seiter
Lisa D. Steinkuhl

Duke Energy Kentucky
Case No. 2022-00229
STAFF First Set Data Requests
Date Received: September 2, 2022

STAFF-DR-01-004

REQUEST:

Refer to the Application, Exhibit 2, page 2 of 8.

- a. The proposed residential PMM Surcharge is \$0.67/month with a revenue requirement of \$773,284 for the residential class and \$889,527 in total. Also, refer to Case No. 2021-00190,¹ Duke Kentucky's response to Staff's Post Hearing Data Request, Item 1. In the response Duke Kentucky estimated the residential rider to be \$0.18/month with a revenue requirement of \$201,034 for the residential class and \$298,271 total. Explain why the revenue requirement and thus the surcharge increased.
- b. Provide the PMM Surcharge on a per CCF basis for each rate class based upon the 2023 forecasted usage.

RESPONSE:

- a. The revenue requirement increased mainly due to the updated in-service date of the Property, Plant and Equipment in Exhibit 2 page 7 of 8 to September 2023 from the in-service date in response to Staff's Post Hearing Data request, Item 1 in Case No. 2021-00190 of December 2023. The increase in the 13-month average of Net Property Plant drove the increase in the required return on PMM related investment, depreciation, and property taxes.

¹ Case No. 2021-00190, *Electronic Application of Duke Energy Kentucky, Inc. for: 1) An Adjustment of the Natural Gas Rates; 2) Approval of New Tariffs, and 3) All Other Required Approvals, Waivers, and Relief* (Ky. PSC Jan. 25, 2022).

b. Please see the chart below for the PMM Surcharge on a per CCF basis for each rate class based on 2023 forecasted usage. Based on the typical usage of 57 ccf, the charge to a customer would be \$0.71 rather than the proposed \$0.67.

Line No.	Rate Schedule	Weighted			Total	Billing		
		Gross Distribution Plant Approved KyPSC Case No. 2021-00190	2023 Projected Revenue Requirement	XXXX True Up Revenue Requirement		Determinants CCF	Monthly Rider PMM	
	(A)	(B)	(C)	(D)	(E)	(F)	(G)	
1	RS- Residential	86.932%	\$ 773,284	\$ -	\$ 773,284	62,523,023	\$ 0.01237	Per CCF
2	GS - General Service	12.506%	111,244	-	111,244	37,845,238	\$ 0.00294	Per CCF
3	FT - Firm Transportation (Includes DGS)	0.341%	3,033	-	3,033	27,065,157	\$ 0.00011	Per CCF
4	IT - Interruptible Transportation	0.221%	1,966	-	1,966	16,655,397	\$ 0.00012	Per CCF
5	Total	100.000%	\$ 889,527	\$ -	\$ 889,527			

PERSON RESPONSIBLE: Lisa D. Steinkuhl

Duke Energy Kentucky
Case No. 2022-00229
STAFF First Set Data Requests
Date Received: September 2, 2022

STAFF-DR-01-005

REQUEST:

Refer to the Application, Exhibit 2, page 6 of 8 showing timing differences arising from accelerated tax depreciation. Refer also to Case No. 2022-00222,¹ the Application, Exhibit F, showing timing differences arising from accelerated tax depreciation on the line labeled FXA02 and timing differences arising from other book-tax differences on the line labeled FXA01, including differences in the manner in which pipeline replacements are expensed as repairs for tax purposes.

- a. State whether Duke Kentucky expects to engage any accelerated expensing of the project at issue in this matter for federal tax purposes other than accelerated tax depreciation.
- b. If Duke Kentucky does not expect to engage in accelerated expensing of the project for federal tax purposes other than accelerated depreciation, explain why Duke Kentucky does not expect to engage in any such accelerated tax expensing.
- c. If Duke Kentucky does expect to engage in accelerated expensing of the project for federal tax purposes other than accelerated depreciation, describe the accelerated expensing Duke Kentucky expects to engage in, and provide a spreadsheet showing all timing differences arising from such accelerated expensing in Excel spreadsheet format with all formulas, rows, and columns fully accessible and unprotected.

¹ Case No. 2022-00222, *Application of Atmos Energy Corporation to Establish PRP Rider Rates for the Twelve Month Period Beginning October 1, 2022* (filed July 29, 2022), Application Exhibit F.

RESPONSE:

- a. Duke Energy Kentucky does not currently expect to engage in any accelerated expensing of the projects at issue for federal income tax purposes.
- b. The IRS has not yet issued guidance for tax repairs on gas transmission and distribution property. The IRS has stated that guidance is being developed, but no timeframe of when it will be issued is known. This guidance has been forthcoming for several years now.
- c. N/A

PERSON RESPONSIBLE: Rodney Smith

Duke Energy Kentucky
Case No. 2022-00229
STAFF First Set Data Requests
Date Received: September 2, 2022

STAFF-DR-01-006

REQUEST:

Refer to the Application, Exhibit 2, page 5 of 8.

- a. Explain how retirements on Line No. 5 were projected, including why no retirements were reflected in September, October, and November 2023.
- b. Explain how retirements on Line Nos. 6 and 7 were projected, including why no retirements were reflected on those lines.
- c. Explain why the manner in which Duke Kentucky projected retirements is reasonable.
- d. If the retirements reflected on Line Nos. 5, 6, and 7 represent a netting of values that partially cancel each other out, provide a breakdown of those values for each month and explain what they request.

RESPONSE:

- a. This retired pipeline is being abandoned in place which involves removing gas from the line, going through an environmental checklist and then cutting and capping the line. The retirement costs were projected based on needed work to abandon the pipeline. The date of projected retirement was estimated based on the in-service date of Phase One of the AM07 pipeline and the work needed after the line is abandoned. The retirement was estimated to be completed in December in the Company's financial systems. The assumptions regarding the projections will be

trued-up to actuals in the next annual filing; therefore, the customers pay no more or no less than the actual costs incurred.

- b. There are no retirements for land or land rights and the station being installed is new, so there is no existing station to retire. That only leaves the abandonment costs for the pipeline.
- c. The methodology used to project retirements is reasonable because it is attempting to mirror how the actual retirements will occur.
- d. There is no netting of values.

PERSON RESPONSIBLE: Bradley A. Seiter

**Duke Energy Kentucky
Case No. 2022-00229
STAFF First Set Data Requests
Date Received: September 2, 2022**

STAFF-DR-01-007

REQUEST:

Provide Exhibit 2 to the Application in Excel spreadsheet format with all formulas, rows, and columns fully accessible and unprotected.

RESPONSE:

Please see STAFF-DR-01-007 Attachment for the excel spreadsheet format of Exhibit 2 to the Application.

PERSON RESPONSIBLE: Lisa D. Steinkuhl

Duke Energy Kentucky
Pipeline Modernization Mechanism ("Rider PMM")
Forecasted Period Ending December 31, 2023
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<u>Schedule</u>	<u>Description</u>
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2.2	PMM Additions and Retirements
3.0	Billing Determinants

Duke Energy Kentucky
 Pipeline Modernization Mechanism ("Rider PMM")
 Rider PMM by Rate Schedule

Line No.	Rate Schedule (A)	Weighted			Total (E)	Billing Determinants # of Bills / CCF (F)	Monthly Rider PMM (G)
		Gross Distribution Plant Approved KyPSC Case No. 2021-00190 (B)	2023 Projected Revenue Requirement (C)	XXXX True Up Revenue Requirement (D)			
1	RS- Residential	86.932%	\$ 773,284	\$ -	\$ 773,284	1,156,418	\$ 0.67 Per Customer
2	GS - General Service	12.506%	111,244	-	111,244	92,746	\$ 1.20 Per Customer
3	FT - Firm Transportation (Includes DGS)	0.341%	3,033	-	3,033	27,065,157	\$ 0.00011 Per CCF
4	IT - Interruptible Transportation	0.221%	1,966	-	1,966	16,655,397	\$ 0.00012 Per CCF
5	Total	100.000%	\$ 889,527	\$ -	\$ 889,527		
			Sch. 1.1	Sch. 4.1		Sch. 3.0	

The cap for the annual PMM revenue requirement is no more than 5% increase in natural gas revenue per year
 Natural gas revenue is defined to include base, gas cost and miscellaneous revenue

**Duke Energy Kentucky
 Pipeline Modernization Mechanism ("Rider PMM")
 Forecasted PMM Revenue Requirement for 2023**

Line No.	(A)	PMM Investment December 31, 2023 (B)	Reference (C)
Return on Investment			
Rate Base			
1	Net PMM Investment - Property, Plant and Equipment	\$ 8,364,433	Sch. 2.2
2	Cost of Removal	-	Sch. 2.2
3	Accumulated Reserve for Depreciation	<u>(15,873)</u>	Sch. 2.0
4	Net PP&E	8,348,560	
5	Accumulated Deferred Taxes on Liberalized Depreciation	<u>(35,162)</u>	Sch. 2.1
6	Net Rate Base	8,313,398	Line 4 + Line 5
7	Authorized Rate of Return, Adjusted for Income Taxes	8.087%	Sch. 1.2
8	Required Return on PMM Related Investment	<u>\$ 672,305</u>	Line 6 * Line 7
Operating Expenses			
9	Depreciation	\$ 105,327	Sch. 2.0
10	Property Tax	110,567	Line 4 * 1.32438%
11	PSC Assessment	<u>1,328</u>	(Sum Line 8 thru 11) * (0.1493% / (1-0.1493%))
12	Total Operating Expenses	217,222	Sum Lines 9 thru 12
13	Total Annual Revenue Requirement	<u>\$ 889,527</u>	Line 8 + Line 12

Notes:

(1) Property taxes estimated using an effective rate of 1.32438%

(2) PSC Assessment using Fiscal Year 2021 rate of 0.1493%

Duke Energy Kentucky
Pipeline Modernization Mechanism ("Rider PMM")
Cost of Capital

Line No.	Capital Structure (A)	Ratio (B)	Cost (C)	Weighted Cost (D)	Pre-Tax @ Effect. Tax Rate of 24.925% (E)
1	Short term Debt	2.617%	1.667%	0.044%	0.044%
2	Long term Debt	46.039%	3.656%	1.683%	1.683%
3	Equity	<u>51.344%</u>	<u>9.300%</u>	<u>4.775%</u>	<u>6.360%</u>
4	Total	100.000%		6.502%	8.087%

Capital structure and cost of debt approved in Case No. 2021-00190
 Return on equity approved in Case No. 2021-00190 for use in natural gas capital riders

Duke Energy Kentucky
 Pipeline Modernization Mechanism ("Rider PMM")
 Depreciation

Line No.	Description (A)	Acct Number (B)	(C)	EOY 2022 (D)	Projected 2023 Additions												EOY 2023 (Q)		
					Jan (E)	Feb (F)	Mar (G)	Apr (H)	May (I)	Jun (J)	Jul (K)	Aug (L)	Sep (M)	Oct (N)	Nov (O)	Dec (P)			
Gas Plant Investments ⁽¹⁾																			
Additions																			
1	Mains - Feeder	376	\$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	16,014,245	1,143,875	953,229	953,229	19,064,578	
2	System M&R Station Equipment	378	\$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	7,650,507	546,465	455,387	455,387	9,107,746	
3	Land and Land Rights	374	\$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	1,158,643	82,760	68,967	68,967	1,379,337	
4	Total Additions		\$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	24,823,395	1,773,100	1,477,583	1,477,583	29,551,661	
Retirements																			
5	Mains - Feeder	376	\$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	308,000	308,000
6	System M&R Station Equipment	378	\$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	-
7	Land and Land Rights	374	\$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	-
8	Total Retirements		\$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	308,000	308,000
Cost of Removal																			
9	Mains - Feeder	376	\$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	-
10	System M&R Station Equipment	378	\$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	-
11	Land and Land Rights	374	\$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	-
12	Total Cost of removal		\$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	-
Accumulated Depreciation Reserve																			
				Annual Depreciation Rate	EOY 2022	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	13 month Average	
13	Mains - Feeder	376	1.49%	\$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	19,884	21,305	22,488		
14	System M&R Station Equipment	378	2.04%	\$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	13,006	13,935	14,709		
15	Land and Land Rights	374	0.00%	\$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$		
16	Total Additions			\$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	32,890	35,240	37,197		
21	Total Accumulated Depreciation Reserve			\$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	32,890	68,130	105,327	15,873	

Notes:
 (1) See Schedule 2.2 for detail of 2023 PMM eligible additions.

Duke Energy Kentucky
 Pipeline Modernization Mechanism ("Rider PMM")
 Deferred Taxes on Liberalized Depreciation

ADFIT balance when proration is applied

2023 Projection Filing	A	B	C	A + B + C = D	A * 5% = E	B * 3.75% = F	E + F = G	H	G - H = I	J	K	L	(G * L) / K = M	N
Month	Book Adds/Retires - 15 YR MACRS	Book Adds/Retires - 20 YR MACRS	Book Adds/Retires - Non-Depreciable Land	Total Book Additions/ Retirements	1st Yr 15 Yr MACRS for Tax - 5%	1st Yr 20 Yr MACRS for Tax - 3.75%	Total MACRS Depreciation	Book Depreciation	Book/Tax Difference	Accumulated Book/Tax Difference	Days to Prorate	Future Days in Period	Prorated Book/Tax Difference	Prorated Accumulated Book/Tax Difference
projected Dec-22										-				
projected Jan-23										-	31	335	-	-
projected Feb-23										-	28	307	-	-
projected Mar-23										-	31	276	-	-
projected Apr-23										-	30	246	-	-
projected May-23										-	31	215	-	-
projected Jun-23										-	30	185	-	-
projected Jul-23										-	31	154	-	-
projected Aug-23										-	31	123	-	-
projected Sep-23	16,014,245	7,650,507	1,158,643	24,823,395	200,178	71,724	271,902		271,902	271,902	30	93	69,279	69,279
projected Oct-23	1,143,875	546,465	82,760	1,773,100	219,243	78,554	297,797	32,890	264,907	536,809	31	62	44,998	114,277
projected Nov-23	953,229	455,387	68,967	1,477,583	243,073	87,093	330,166	35,240	294,926	831,735	30	32	25,857	140,133
projected Dec-23	645,229	455,387	68,967	1,169,583	275,335	104,170	379,505	37,197	342,308	1,174,042	31	1	938	141,071
Total	18,756,578	9,107,746	1,379,337	29,243,661	937,829	341,540	1,279,369	105,327	1,174,042		365		141,071	
	Sch. 2.0	Sch. 2.0	Sch. 2.0	Sch. 2.0					Sch. 2.0				Tax Rate	24.925%
													Forecasted ADIT	35,162

Duke Energy Kentucky
 Pipeline Modernization Mechanism ("Rider PMM")
 Thirteen Month Average Additions and Retirements

Test Year 12/31/23 PMM Investment Summary

Line No.	Month (A)	Number of Months (B)	PMM Capex		Retirements		Cost of Removal	
			By Month (C)	Cumulative (D)	By Month (E)	Cumulative (F)	By Month (G)	Cumulative (H)
1	Balance @ 12/31/2022	13		\$ -		\$ -		\$ -
2	Jan-23	12	\$ -	-	\$ -	-	\$ -	-
3	Feb-23	11	-	-	-	-	-	-
4	Mar-23	10	-	-	-	-	-	-
5	Apr-23	9	-	-	-	-	-	-
6	May-23	8	-	-	-	-	-	-
7	Jun-23	7	-	-	-	-	-	-
8	Jul-23	6	-	-	-	-	-	-
9	Aug-23	5	-	-	-	-	-	-
10	Sep-23	4	24,823,395	24,823,395	-	-	-	-
11	Oct-23	3	1,773,100	26,596,495	-	-	-	-
12	Nov-23	2	1,477,583	28,074,078	-	-	-	-
13	Dec-23	1	1,477,583	29,551,661	308,000	308,000	-	-
				\$ 109,045,628		\$ 308,000		\$ -
14	Number of months			13		13		13
15	13 Month Average			\$ 8,388,125		\$ 23,692		\$ -

Duke Energy Kentucky
 Pipeline Modernization Mechanism ("Rider PMM")
 PMM Rider Billing Determinants by Rate Schedule
 for the Twelve Month Ending December, 2023

Line	Rate Schedule	Jan-23	Feb-23	Mar-23	Apr-23	May-23	Jun-23	Jul-23	Aug-23	Sep-23	Oct-23	Nov-23	Dec-23	Total
<u>No.</u>	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)	(L)	(M)	(N)
1	RS - Residential (Number of Customers)	96,662	96,519	96,678	96,477	96,383	96,096	95,892	95,818	95,844	96,101	96,712	97,235	1,156,418
2	GS - General Service (Number of Customers)	7,944	7,944	7,935	7,816	7,693	7,599	7,532	7,514	7,522	7,581	7,775	7,892	92,746
3	FT - Firm Transportation (CCF)	3,606,770	2,914,649	2,936,959	1,971,667	1,850,915	1,616,123	1,552,284	1,614,994	1,581,597	1,935,595	2,415,104	3,068,500	27,065,157
4	IT - Interruptible Transportation (CCF)	1,515,504	1,365,505	1,385,967	1,309,634	1,327,458	1,314,060	1,314,190	1,393,968	1,319,910	1,492,703	1,500,891	1,415,607	16,655,397