

VERIFICATION

STATE OF OHIO)
)
COUNTY OF HAMILTON) SS:

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 22ND day of NOVEMBER, 2022.



ADELE M. FRISCH
Notary Public, State of Ohio
My Commission Expires 01-05-2024



NOTARY PUBLIC

My Commission Expires: 1/5/2024

KyPSC Case No. 2022-00229
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DATA REQUEST

WITNESS

TAB NO.

STAFF-DR-03-001

Brad Seiter 1

Duke Energy Kentucky
Case No. 2022-00229
STAFF Third Set Data Requests
Date Received: November 18, 2022

STAFF-DR-03-001

REQUEST:

Refer to the Application, Exhibit 2, page 5, reflecting when Phase 1 of the AM07 Pipeline Replacement is added to plant in service. Refer also to Case No. 2022-00084,¹ the Application. Direct Testimony Bradley A. Seiter, Exhibit 6, page 7 in which Duke Kentucky provided an Estimated Project Schedule for Phase 1 of the AM07 Pipeline Replacement.

- a. Explain whether the timing of the additions to plant in service shown on Exhibit 2 are still accurate even though a Certificate of Public Necessity and Convenience has not yet been issued for Phase 1 of the AM07 Pipeline Replacement.
- b. If the timing of the additions to plant in service are no longer accurate, provide and explain the new estimated project schedule, and provide an update to Exhibit 2, in Excel spreadsheet format with all cells, columns and rows fully accessible and unprotected, reflecting the new estimated project schedule.
- c. If the timing of the additions to plant in service are still accurate, explain how that is possible given Mr. Seiter's testimony and explain when Duke Kentucky would need approval for the project to maintain the current project schedule.

RESPONSE:

- a. They are still accurate.

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 Mar. 29, 2022).

- b. The schedule is still the same. No changes at this time.
- c. The schedule for construction is still the same. We plan to begin construction in Q1 of 2023. Our schedule was built to allow for the appropriate amount of time to receive the CPCN approval. There are no impacts to our planned estimate or in-service date at this time.

PERSON RESPONSIBLE: Bradley A. Seiter