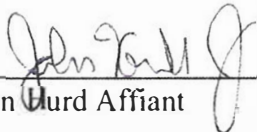


VERIFICATION

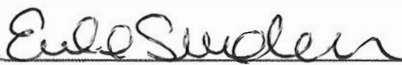
STATE OF OHIO)
) SS:
COUNTY OF HAMILTON)

The undersigned, John Hurd, Director of Stakeholder Engagement, being duly sworn, deposes and says that he has personal knowledge of the matters set forth in the foregoing data responses and that are true and correct to the best of his knowledge, information and belief.



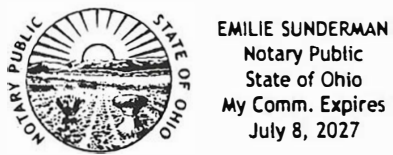
John Hurd Affiant

Subscribed and sworn to before me by John Hurd on this 15 day of May, 2023,
2023.



NOTARY PUBLIC

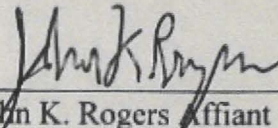
My Commission Expires: July 8, 2027



VERIFICATION

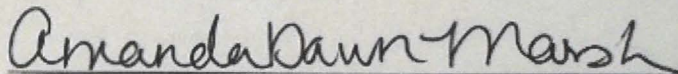
STATE OF OHIO)
)
COUNTY OF HAMILTON) SS:

The undersigned, John K. Rogers, Manager Transmission Engineer, being duly sworn, deposes and says that he has personal knowledge of the matters set forth in the foregoing data responses and that are true and correct to the best of his knowledge, information and belief.



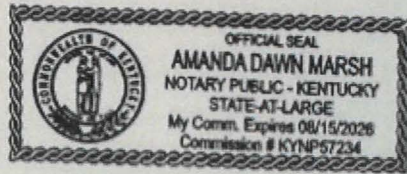
John K. Rogers Affiant

Subscribed and sworn to before me by John K. Rogers on this 11 day of May, 2023.



NOTARY PUBLIC

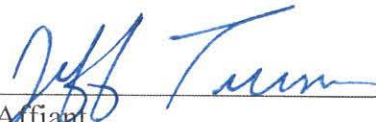
My Commission Expires: 8/15/2024



VERIFICATION

STATE OF OHIO)
) SS:
COUNTY OF HAMILTON)

The undersigned, Jeff Turner, Principal Engineer, being duly sworn, deposes and says that he has personal knowledge of the matters set forth in the foregoing data responses and that are true and correct to the best of his knowledge, information and belief.



Jeff Turner Affiant

Subscribed and sworn to before me by Jeff Turner on this 15th day of May, 2023.



NOTARY PUBLIC

My Commission Expires: July 8, 2027



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

KyPSC Case No. 2022-00364
TABLE OF CONTENTS

<u>DATA REQUEST</u>	<u>WITNESS</u>	<u>TAB NO.</u>
STAFF-DR-03-001	John K. Hurd.....	1
STAFF-DR-03-002	John K. Hurd.....	2
STAFF-DR-03-003	John K Rogers.....	3
STAFF-DR-03-004	Jeff O. Turner.....	4
STAFF-DR-03-005 PUBLIC	Jeff O. Turner.....	5

**Duke Energy Kentucky
Case No. 2022-00364
STAFF Third Set of Data Requests
Date Received: May 5, 2023**

STAFF-DR-03-001

REQUEST:

Refer to Duke Kentucky's response to Commission Staff's First Request for Information (Staff's First Request), Item 2, Attachment 1 and Attachment 2. For each party listed for which no notice was provided, explain why notice of this application was not given.

RESPONSE:

For each party listed which no notice was provided, notice of this application was not given because those parties were not anticipated to be impacted by the proposed right-of-way for the new line and the existing right-of-way for the rebuild line.

PERSON RESPONSIBLE: John K. Hurd

STAFF-DR-03-002

REQUEST:

Refer to Duke Kentucky's response to Commission Staff's Second Request for Information (Staff's Second Request), Item 3.

- a. Provide a comparison of the cost of selecting proposed Route R versus the selected Route L.
- b. Explain how Route R impacted businesses when the proposed route is along a private drive.

RESPONSE:

- a. A cost estimate for Route R was not completed during the route selection study. A detailed cost estimate for Route L, the preferred route for the new line can be found in Exhibit 6 of the Application. During the route selection study, some of the criteria utilized in the comparative evaluation process represent proxies for cost. While Route R and Route L were very similar in the comparative evaluation results, 6 criteria that differed between the two routes also represent cost. Route R had one additional property owner that would require new easements, an additional 2.88 acres of new right-of-way that would be required, an additional 65 linear feet in length, and an additional turn angle greater than 20 degrees. While Route L had an additional 585 of utilities within the proposed right-of-way and an additional 490 feet of slopes greater than 20 degrees along the centerline.
- b. Route R would impact businesses more by creating a longer greenfield transmission line corridor by not parallel the existing transmission line corridor further.

Some of the business would then have a transmission line on 3 sides of the building instead of just 2, which could further limit future operations or development expansion possibilities. Additionally, Route R would also require an additional 2.88 acres of right-of-way since it cannot take advantage of the overlapping rights-of-way that Route L utilizes. An additional 2.88 acres of right-of-way further restricts future operations or development expansion possibilities.

PERSON RESPONSIBLE: John K. Hurd

**Duke Energy Kentucky
Case No. 2022-00364
STAFF Third Set of Data Requests
Date Received: May 5, 2023**

STAFF-DR-03-003

REQUEST:

Refer to Duke Kentucky's response to Staff's Second Request, Item 5. Provide the date of the inspection of the existing 69kV line and the number of encroachments observed during the inspection.

RESPONSE:

The last ground inspection on circuit 6763 and 15268 was in 2022. The lines have an aerial inspection done twice per year. When these aerial inspections are performed, the inspectors do not know the precise boundaries of the entire easement areas and; therefore, only point out obvious encroachments or ground disturbances close to the structures or wire. No such obstructions were reported during the recent inspections. The ground inspections are focused on structural and wire integrity.

PERSON RESPONSIBLE: John K. Rogers

Duke Energy Kentucky
Case No. 2022-00364
STAFF Third Set of Data Requests
Date Received: May 5, 2023

STAFF-DR-03-004

REQUEST:

Reconcile the following statements in Staff's Second Request for Information, Item 9 and Item 11, "5-10 years to upgrade to 138 kV" and "overload conditions in 2025." Explain how Duke Kentucky plans to address the overload prior to upgrading to 138 kV.

RESPONSE:

The conversion to 138 kV is not required to meet the expected near-term load conditions. The "overload conditions in 2025" references overload conditions on existing sections of Duke Energy Kentucky 69 kV lines without the upgrades to be implemented by the project for which the Certificate of Public Convenience and Necessity for the Hebron to Oakbrook Transmission Project was requested. Upon completion of the project, the potential overloads will be mitigated, and the Duke Energy Kentucky 69 kV system in the vicinity will then have sufficient capacity to serve the expected area load. The 5 to 10 year figure for possible conversion to 138 kV was provided as a rough estimate of the possible need to do so, and the conversion will only be implemented if and when loading conditions exceed the capacity of the 69 kV system.

PERSON RESPONSIBLE: Jeff O. Turner

Duke Energy Kentucky
Case No. 2022-00364
STAFF Third Set of Data Requests
Date Received: May 5, 2023

PUBLIC STAFF-DR-03-005

REQUEST:

Refer to Duke Kentucky's confidential responses to Staff's Second Request, Item 11(b), Attachments 1 and 2. Much of this information is almost two years old. Provide updated information as to each proposed or announced project including whether the project is still planned, in progress, or completed.

RESPONSE:

CONFIDENTIAL PROPRIETARY TRADE SECRET (As to Attachment only)

An update providing detailed status of each and every of the potential projects listed on the previously supplied information is not available. Duke Energy Kentucky does not track such information in an effort to precisely match infrastructure additions and improvements to such data. Duke Energy Kentucky believes that the data provided previously supports the conclusion that the proposed project is required, despite the fact that the data was prepared two years ago. The requested project was identified development began over two years ago. Given the lead times required to plan, design, engineer, schedule, and build projects, Duke Energy Kentucky must decide on a course of action and proceed based on the best available data at the time. Duke Energy Kentucky will monitor conditions at a high level as a project is implemented. If a major event occurred, such as a large customer arriving or leaving, or a change in economic outlook that would obviously change the needs of the area, the Company would re-evaluate its plans and adjust as might be justified. In this case, the Company has not seen anything to indicate that the additional transmission

capacity that the proposed project will provide will not be needed in the near future. To further support the growth potential of the area to be supported by the proposed project, Duke Energy Kentucky Customer Delivery prepared STAFF-DR-03-005 Confidential Attachment which presents information and status on a number of recently completed and planned developments in the area.

The confidential attachment to this response will be provided to parties granted intervention in this case upon the execution of a mutually acceptable confidentiality agreement.

PERSON RESPONSIBLE: Jeff O. Turner

**CONFIDENTIAL PROPRIETARY TRADE
SECRET**

**STAFF-DR-03-005
CONFIDENTIAL ATTACHMENT**

FILED UNDER SEAL