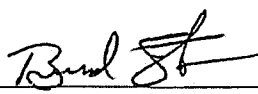


VERIFICATION

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 the answers contained therein 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 21st day of November, 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. 2023-00210
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Duke Energy Kentucky
Case No. 2023-00210
STAFF Second Set of Data Requests
Date Received: November 7, 2023

STAFF-DR-02-001

REQUEST:

Refer to Duke Kentucky's response to Commission Staff's First Request for Information, Item 2(b) and Case No. 2022-00084,² Duke Kentucky's response to Commission Staff's Third Request for Information, Item 1(a), stating an estimated cost of \$33,875,000 to retrofit pipeline for use of an in-line inspection (ILI) tool in Phase I of construction.

a. To the extent possible, itemize the \$11.5 million estimated cost of a retrofit of existing pipeline to allow use of ILI.

b. State whether the estimated cost of \$33,875,000 to retrofit pipeline for use of an ILI tool in Phase I of construction included estimated excavation and replacements of vintage pipe material.

c. Explain the reason for the difference between estimated cost of retrofitting pipeline for use of an ILI tool between Phase I and Phase II of construction.

RESPONSE:

a. The \$11.5 million estimate is based off historical averages for retrofit of a 24" pipeline on a per mile basis. It includes the following categories of costs: engineering, permitting, land costs, materials and equipment, construction-services, inspections, testing, direct labor, overheads and AFUDC. The costs were estimated based upon indicative estimates from these prior projects that result in an average/approx. cost of \$3.5

² 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 Sept. 30, 2022), Duke Kentucky's Response to Commission Staff's Third Request for Information, Item 1(a).

million/mile. In this case, it typically costs \$3.5 million per mile for retrofit work over 3.25 miles of line. This includes all excavation and replacement work associated with retrofitting the line.

b. Yes - The \$33,875,000 is inclusive of 4.5 miles of retrofit work along with the cost needed to pressure test the line and run temporary LNG as needed.

c. The cost difference is based on a longer segment of line to be addressed in phase I compared to phase II along with the inclusion of hydrotest and temporary LNG on phase I. The costs would be similar if pressure testing and temp LNG was included in the retrofit estimate for phase II.

PERSON RESPONSIBLE: Bradley A. Seiter

**Duke Energy Kentucky
Case No. 2023-00210
STAFF Second Set of Data Requests
Date Received: November 7, 2023**

STAFF-DR-02-002

REQUEST:

Provide an estimated cost for excavation and replacements of vintage pipe material if the pipeline were retrofitted for use of an ILI tool or pressure tested.

RESPONSE:

The cost to retrofit the phase II segment would be \$11.5 million. If pressure testing scope is included, along with required temporary LNG, the cost would be \$23,725,000.

PERSON RESPONSIBLE: Bradley A. Seiter