

**VERIFICATION**

STATE OF OHIO                    )  
  )        SS:  
COUNTY OF HAMILTON        )

The undersigned, Bret Litmer, Manager Centralized Design, 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.

Bret Litmer  
Bret Litmer Affiant

Subscribed and sworn to before me by Bret Litmer on this 3<sup>rd</sup> day of October, 2023.

Deanna D. Wycze  
NOTARY PUBLIC

My Commission Expires: February 15, 2025



DEANNA D WYCZE  
Notary Public  
State of Ohio  
My Comm. Expires  
February 15, 2025

**KyPSC Case No. 2023-00283**  
**TABLE OF CONTENTS**

<b><u>DATA REQUEST</u></b>	<b><u>WITNESS</u></b>	<b><u>TAB NO.</u></b>
STAFF-DR-01-001	Bret Litmer .....	1
STAFF-DR-01-002	Bret Litmer .....	2
STAFF-DR-01-003	Bret Litmer .....	3
STAFF-DR-01-004	Bret Litmer .....	4
STAFF-DR-01-005	Bret Litmer .....	5

**Duke Energy Kentucky**  
**Case No. 2023-00283**  
**STAFF First Set of Data Requests**  
**Date Received: September 21, 2023**

**STAFF-DR-01-001**

**REQUEST:**

In the Application, Amended Exhibit 4 (page 4 of 4) Duke Kentucky and Owen Electric Cooperative, Inc. (Owen Electric) state, “This request has been evaluated by both Duke and Owen Electric Engineering teams and they have determined that some revisions to the current Territory Boundary would benefit all parties involved.” Explain in detail how the requested revisions to the territorial boundary would benefit all parties involved.

**RESPONSE:**

The proposed territory boundary revision evenly redistributes the lots within the Ballyshannon Development based on the most efficient electrical infrastructure design for both Duke Energy Kentucky and Owen Electric Cooperative, Inc. This will limit the length of wire and number of transformers per residential customer for both utility providers. This results in a lower cost for the initial installation as well as a more reliable system for the future customers.

**PERSON RESPONSIBLE:**           Bret Litmer

**Duke Energy Kentucky  
Case No. 2023-00283  
STAFF First Set of Data Requests  
Date Received: September 21, 2023**

**STAFF-DR-01-002**

**REQUEST:**

Explain in detail the reasons for the requested territorial boundary change.

**RESPONSE:**

The existing territory boundary line within the proposed development creates isolated areas for both utility providers. If the proposed change is not made, then additional easements will be required to cross customer property to serve these isolated areas.

**PERSON RESPONSIBLE:** Bret Litmer

**Duke Energy Kentucky  
Case No. 2023-00283  
STAFF First Set of Data Requests  
Date Received: September 21, 2023**

**STAFF-DR-01-003**

**REQUEST:**

Explain in detail how this proposed boundary change promotes the orderly development of retail electric service.

**RESPONSE:**

The proposed territory boundary revision aligns with the design of the electrical infrastructure for both Duke Energy Kentucky and Owen Electric Cooperative, Inc. As mentioned in response to Staff-DR-001-002, this will result in a lower cost for the initial installation, a more reliable system for the future customers, and minimize the number of easements required.

**PERSON RESPONSIBLE:** Bret Litmer

**Duke Energy Kentucky  
Case No. 2023-00283  
STAFF First Set of Data Requests  
Date Received: September 21, 2023**

**STAFF-DR-01-004**

**REQUEST:**

Explain in detail how this proposed boundary change avoids wasteful duplication of facilities and unnecessary encumbering of the landscape.

**RESPONSE:**

The proposed territory boundary revision prevents any unnecessary easements and line extensions to isolated areas within the development. Both parties have developed a design based on this revision to have all facilities follow the road right of way and minimize the length of wire installed.

**PERSON RESPONSIBLE:** Bret Litmer

**Duke Energy Kentucky  
Case No. 2023-00283  
STAFF First Set of Data Requests  
Date Received: September 21, 2023**

**STAFF-DR-01-005**

**REQUEST:**

Explain in detail how this proposed boundary change minimizes disputes between retail electric suppliers which may result in inconvenience, diminished efficiency, and higher cost to the consumer.

**RESPONSE:**

The proposed territory boundary provides the most logical separation of electric suppliers based on the developers' proposed streets. Both parties have developed an infrastructure design that follows the path of the new road right of way and avoids any additional runs through customer's property.

**PERSON RESPONSIBLE:** Bret Litmer