


KyPSC Case No. 2024-00189
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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 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 3rd day of September, 2024.

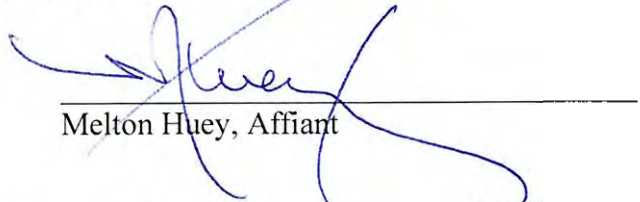
NOTARY PUBLIC

My Commission Expires:

VERIFICATION

STATE OF NORTH CAROLINA)
) SS:
COUNTY OF MECKLENBURG)

The undersigned, Melton Huey, General Manager – Engineering, Planning and Pipeline Integrity, 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.


Melton Huey, Affiant

Subscribed and sworn to before me by Melton Huey on this 27th day of August, 2024.

SHANNON L. WALL
Notary Public, North Carolina
Mecklenburg County
My Commission Expires
June 28, 2027


NOTARY PUBLIC

My Commission Expires: 6/28/2027

Duke Energy Kentucky
Case No. 2024-00189
STAFF First Set of Data Requests
Date Received: August 21, 2024

STAFF-DR-01-001

REQUEST:

Refer to Application, page 2, which states “In addition, approximately 3.6 miles of the existing AM07 will be downrated to a distribution pressure system to help continue serving customers in the area.”

- a. Explain what is meant by the pipeline being downrated but continue in service,
- b. Why is this necessary, and
- c. how will the process be accomplished.

RESPONSE:

- a. The current AM07 that is being replaced is currently operating at approximately 370 psig. Instead of completely abandoning the section of line, Duke Energy Kentucky is going to continue utilizing the line as a distribution system in which it will operate at a 175-psig pipeline. This is called a “downrate” in pressure.
- b. This allows us to continue to utilize the pipeline as a redundant feed for our distribution system in the area.
- c. We will install regulation equipment at regulating facility that will cut the pressure down from 370psig to 175psig.

PERSON RESPONSIBLE: Brad Seiter

Duke Energy Kentucky
Case No. 2024-00189
STAFF First Set of Data Requests
Date Received: August 21, 2024

STAFF-DR-01-002

REQUEST:

Refer to Application, page 2, which states that “3,715’ of the existing AM07 will be fully abandoned.”

- a. Explain the environmental impact of the abandonment.
- b. Provide estimated costs associated with abandonment.
- c. Provide estimated cost for removal of the portion of the pipeline to be abandoned.

RESPONSE:

- a. After the line is abandoned, it will be checked to confirm no environmental contaminations are present. Once confirmed there are no contaminants present, the pipeline will be left in place. This presents no environmental impact.
- b. Costs associated with abandonment are negligible. Once confirmation of no contamination is complete, the pipe is left abandoned in place with no further action taken.
- c. Assuming the pipeline is abandoned in place, there will be minimal cost for removal. Per internal procedures, only small, three-to-four-foot sections of pipe every 1000’ are to be cut out to help with cathodic protection purposes on newly installed pipeline.

PERSON RESPONSIBLE: Brad Seiter

**Duke Energy Kentucky
Case No. 2024-00189
STAFF First Set of Data Requests
Date Received: August 21, 2024**

STAFF-DR-01-003

REQUEST:

Refer to Application, page 6, paragraph 9 and Case No. 2023-00210,2 Direct Testimony of Neil M. Moser, page 6. Explain the reasons for the differences in the estimated costs for each between the two filings.

RESPONSE:

The estimate provided in the Direct Testimony of Neil Moser for Case No. 2023-00210 was \$47,210,100. The current estimate provided in the latest filing is \$48,500,000. The difference in the estimates of \$1,289,900 is attributable to increases in land cost projections, material costs, and slight adjustments to construction costs.

PERSON RESPONSIBLE: Brad Seiter

Duke Energy Kentucky
Case No. 2024-00189
STAFF First Set of Data Requests
Date Received: August 21, 2024

STAFF-DR-01-004

REQUEST:

Refer to plans and specifications at Application, Exhibit 3.

- a. Provide the useful lives of all equipment to be constructed according to the plans.
- b. Identify any alternative designs or materials that could be used to comply with federal regulations.
- c. Provide the estimated costs and useful lives of alternative pipeline designs or materials identified in the response to 4(b).

RESPONSE:

- a. Anticipated service life should be 50+ years when facilities are maintained properly per regulatory requirements per CFR 49 Part 192 and Duke Energy O&M policies and procedures. Component replacements may be required if they become outdated and parts are not readily available. Customer load increases may warrant upsizing components or station replacement.
- b. Hydrotest and retrofitting of the pipeline to allow for in-line inspection.
- c. Phase III (4.3 miles): ILI Retrofit work - \$15,050,000 (\$3.5 million/mile) + Temp LNG and Pressure testing: \$14,750,000.

PERSON RESPONSIBLE: Mel Huey