

KyPSC Case No. 2025-00142
TABLE OF CONTENTS

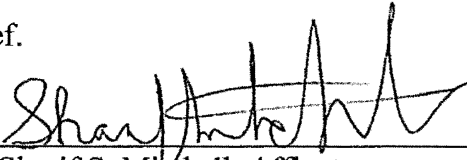
<u>DATA REQUEST</u>	<u>WITNESS</u>	<u>TAB NO.</u>
STAFF-DR-01-001	Sharif S. Mitchell	1
STAFF-DR-01-002	Randall L. Suttles	2
STAFF-DR-01-003	Jefferson “Jay” P. Brown Neil M. Moser	3
STAFF-DR-01-004	Jeff Schuchter	4
STAFF-DR-01-005	Neil M. Moser	5
STAFF-DR-01-006	Neil M. Moser	6
STAFF-DR-01-007	Jeff Schuchter	7
STAFF-DR-01-008	Jeff Schuchter	8
STAFF-DR-01-009	Jeff Schuchter	9
STAFF-DR-01-010	Jeff Schuchter	10
STAFF-DR-01-011	Neil M. Moser	11
STAFF-DR-01-012	Jefferson “Jay” P. Brown	12

VERIFICATION

STATE OF NORTH CAROLINA)
)
COUNTY OF MECKLENBURG)

SS:

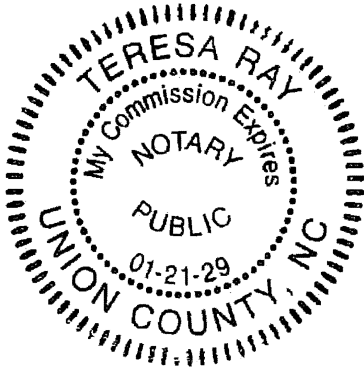
The undersigned, Sharif S. Mitchell, Manager Accounting, being duly sworn, deposes and says that he has personal knowledge of the matters set forth in the foregoing data requests, and that the information contained therein is true and correct to the best of his knowledge, information, and belief.


Sharif S. Mitchell, Affiant

Subscribed and sworn to before me by Sharif S. Mitchell on this 5th day of January, 2026.


NOTARY PUBLIC


My Commission Expires: 01 | 21 | 29



VERIFICATION

STATE OF OHIO)
) SS:
COUNTY OF HAMILTON)

The undersigned, Randall L. Suttles, Manager Gas Regulatory Compliance, being duly sworn, deposes and says that he has personal knowledge of the matters set forth in the foregoing data requests, and that the information contained therein is true and correct to the best of his knowledge, information, and belief.



Randall L. Suttles, Affiant

Subscribed and sworn to before me Randall L. Suttles on this 01st day of January, 2026.



NOTARY PUBLIC

My Commission Expires: July 8, 2027

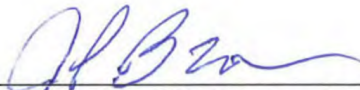


EMILIE SUNDERMAN
Notary Public
State of Ohio
My Comm. Expires
July 8, 2027

VERIFICATION

STATE OF OHIO)
)
COUNTY OF HAMILTON) SS:

The undersigned, Jefferson "Jay" P. Brown, Director of Rates & Regulatory Planning, being duly sworn, deposes and says that he has personal knowledge of the matters set forth in the foregoing data requests, and that the information contained therein is true and correct to the best of his knowledge, information, and belief.



Jefferson "Jay" P. Brown, Affiant

Subscribed and sworn to before me Jefferson "Jay" P. Brown on this 6th day of January, 2026.



NOTARY PUBLIC

My Commission Expires: July 8, 2027



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

VERIFICATION

STATE OF NORTH CAROLINA)
)
COUNTY OF MECKLENBURG)

The undersigned, Neil M. Moser, Vice President Gas Major Projects, 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.

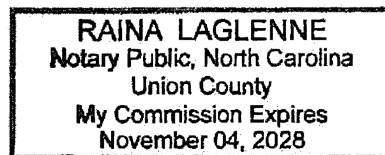
Chief m.m.

Neil M. Moser, Affiant

Subscribed and sworn to before me by Neil M. Moser on this 5th day of
January, 2026.

NOTARY PUBLIC

My Commission Expires:



VERIFICATION

STATE OF KENTUCKY)
)
COUNTY OF CAMPBELL)

SS:

The undersigned, Jeff Schuchter, Manager Project Management, being duly sworn, deposes and says that he has personal knowledge of the matters set forth in the foregoing data requests, and that the information contained therein is true and correct to the best of his knowledge, information, and belief.



Jeff Schuchter, Affiant

Subscribed and sworn to before me by Jeff Schuchter on this 7th day of
January, 2026.



NOTARY PUBLIC

My Commission Expires: 12/20/2027



CHRYSTIA MICHELLE ROGACKI
Notary Public, Kentucky
State At Large
My Commission Expires
December 20, 2027
Notary ID # KYNP83712

STAFF-DR-01-001

REQUEST:

Refer to Duke Kentucky's Application, page 4, requesting that the Commission enter a declaratory order declaring that the costs associated with converting these customers to an alternate fuel source are recoverable costs.

a. Identify the statutes and administrative regulations that Duke Kentucky contends would govern the requested declaration that the costs are recoverable and explain the relevance of such statutes and regulations.

b. State whether Duke Kentucky is requesting specific accounting authority for such costs, and if so, explain what authority is being requested.

c. State whether any statute, regulation, or other legal requirement prevents Duke Kentucky from incurring such costs absent a declaration from the Commission.

RESPONSE:

a. These costs are necessary, and are fair, just, and reasonable to provide service, consistent with KRS 278.030. The fundamental premise of utility depreciation is to match recovery of assets with their use. Removal costs, which are incurred in the future at the time an asset is retired, are part of the cost to be recovered through depreciation. These future removal costs are estimated so that a pattern of recovery can be established and implemented as the assets are used. The concept of depreciation is explained as recovery of the full-service value of an asset where the full-service value is not only the original cost but costs to remove an asset from service.

The Federal Energy Regulatory Commission's (FERC) Code of Federal Regulation / Title 18 / Chapter I / Subchapter C / Part 101 / #10 / States: Cost of removal means the cost of demolishing, dismantling, tearing down or otherwise removing gas plant, including the cost of transportation and handling incidental thereto.

This ensures that costs to take utility infrastructure out of service are properly accounted for and recovered.

b. Duke Energy Kentucky is not requesting specific accounting authority for costs. As explained above, the Company believes the costs are appropriately considered costs of removal by definition. If the Commission believes otherwise, the Company would request accounting treatment the Commission believes would be necessary.

c. The Company objects to this request to the extent it is seeking a legal opinion. Without waiving said objection, the Company does not believe there is any statute or regulation that prevents the Company from recording these costs as a cost of removal if service is abandoned or recovering them in a future proceeding if the Company capitalizes the new lines to continue service.

PERSON RESPONSIBLE: As to objection, Legal
As to response, Sharif Mitchell

**Duke Energy Kentucky
Case No. 2025-00142
STAFF First Request for Information
Date Received: December 16, 2025**

STAFF-DR-01-002

REQUEST:

State whether Duke Kentucky has any customers who receive service by direct "farm tap" on an interstate transmission line other than the 27 customers described in Duke Kentucky's application for declaratory Order and, if so, provide the number, service location, and source of gas of said customers.

RESPONSE:

Duke Energy Kentucky has no other customers who receive service by direct "farm tap" on an interstate transmission line other than the 27 previously described.

PERSON RESPONSIBLE: Randall L. Suttles

Duke Energy Kentucky
Case No. 2025-00142
STAFF First Request for Information
Date Received: December 16, 2025

CONFIDENTIAL STAFF-DR-01-003
(As to Attachment (a) only)

REQUEST:

Provide a history of the retail gas service provided to the 27 customers who receive gas service by direct tap on the section of the TC Energy transmission line that is proposed to be abandoned, including:

- a. The date of service that each direct tap was established.
- b. State whether the gas service via direct tap on the TC Energy transmission line was available or offered to the public, or was it limited to owners of property from whom rights of way were required for construction of the pipeline.
- c. State whether new direct "farm taps" have been added since construction of the transmission line. If so, provide the number of additional "farm taps" and the date the taps were added.
- d. Explain whether Duke Kentucky has owned and operated the metering equipment, service lines, regulators, and any other facilities used to provide gas service to the 27 "farm tap" customers since the direct taps were established on the TC Energy line. If not, provide the previous operator(s), the date when Duke Kentucky began to own or operate these facilities, and any agreements between Duke Kentucky.
- e. Any prior operator of these facilities, including any affiliate, concerning the responsibility to serve these 27 customers.
- f. Identify all rates that the 27 customers are currently charged for service,

and if applicable, the tariff page(s) on which each such rate is located. Explain any differences between the tariff rates and the rates the 27 customers are charged.

RESPONSE:

CONFIDENTIAL PROPRIETARY TRADE SECRET (As to Attachment (a) only)

- a. Please see STAFF-DR-01-003(a) Confidential Attachment.
- b. It is Duke Energy Kentucky's understanding that original taps off the pipeline corridor were limited to land-owners. However, over the decades, additional services have been established beyond the contiguous property owners.
- c. Please see STAFF-DR-01-003(a) Confidential Attachment.
- d. Duke Energy Kentucky owns and operates the service lines, metering and regulating equipment, from the tap on the TC Energy pipelines to the customers.
- e. Columbia Gas, KO Transmission, Services have always been provided by Duke Energy Kentucky or predecessor Union Light, Heat, and Power Company.
- f. Please see STAFF-DR-01-003(a) Confidential Attachment and STAFF-DR-01-003(f) Attachment. There is no difference between the tariff rate and what the customers are charged.

PERSON RESPONSIBLE:

Neil Moser – a. thru e.
Jefferson "Jay" P. Brown – f.

Customer Name	Service Address	Current Rate ⁽¹⁾	Date of Tap	Active/Inactive
		Rate GS - Sheet 31	1/26/2006	Active
		Rate RS - Sheet 30	12/30/2016	Active
		N/A	12/13/1988	Inactive
		Rate RS - Sheet 30	7/24/1990	Active
		Rate RS - Sheet 30	11/18/2017	Active
		Rate RS - Sheet 30	2/9/2018	Active
		Rate RS - Sheet 30	11/6/2020	Active
		Rate RS - Sheet 30	8/18/2000	Active
		Rate RS - Sheet 30	8/18/2000	Active
		N/A	8/18/2000	Inactive
		Rate RS - Sheet 30	8/18/2000	Active
		Rate RS - Sheet 30	11/29/1965	Active
		Rate RS - Sheet 30	12/9/1969	Active
		Rate RS - Sheet 30	2/28/2019	Active
		Rate RS - Sheet 30	10/24/1984	Active
		Rate RS - Sheet 30	8/29/1969	Active
		Rate RS - Sheet 30	11/9/2006	Active
		Rate RS - Sheet 30	11/26/2005	Inactive
		Rate RS - Sheet 30	6/10/2015	Active
		Rate RS - Sheet 30	1/1/1973	Active
		Rate RS - Sheet 30	2/5/1988	Active
		Rate RS - Sheet 30	12/18/2007	Active
		Rate RS - Sheet 30	12/7/2017	Active
		Rate RS - Sheet 30	8/16/2011	Active
		Rate RS - Sheet 30	10/8/1999	Active
		Rate RS - Sheet 30	6/30/2014	Active
		Rate RS - Sheet 30	5/3/2017	Active
		Rate RS - Sheet 30	11/9/2012	Active
		Rate RS - Sheet 30	3/23/2004	Active

1. Please see STAFF-DR-01-003(f) Attachment for corresponding tariff sheets

Duke Energy Kentucky, Inc.
1262 Cox Road
Erlanger, Kentucky 41018

KY. P.S.C. Gas No. 2
Two-Hundred-Twenty-Eighth
Revised Sheet No. 30
Cancelling and Superseding
Two-Hundred-Twenty-Seventh
Revised Sheet No. 30
Page 1 of 2

RATE RS
RESIDENTIAL SERVICE

APPLICABILITY

Applicable to firm natural gas service, which is comprised of commodity gas supply and local delivery service, required for all domestic purposes in private residences, single occupancy apartments, and common use areas of multi-occupancy buildings, when supplied at one point of delivery where distribution mains are adjacent to the premises to be served.

NET MONTHLY BILL

The Net Monthly Bill is determined as follows:

All gas is billed in units of 100 cubic feet (CCF).

1. Base Rate:
Customer Charge per month: \$20.00 (I)

	<u>Delivery Rate</u>		<u>Gas Cost Adjustment</u>		<u>Total Rate</u>	
Plus a commodity Charge for all CCF at	\$0.70339	plus	\$0.7508	Equals	\$1.45419	(I)

2. Applicable Riders

The following riders are applicable pursuant to the specific terms contained within each rider:

Sheet No. 62, Rider DSMR, Demand Side Management Rate

Sheet No. 65, Rider WNA, Weather Normalization Adjustment Rider

Sheet No. 66, Rider PMM, Pipeline Modernization Mechanism

Sheet No. 70, Rider GCA, Gas Cost Adjustment Clause

The "Customer Charge" shown above shall be the minimum amount billed each month.

When bills are rendered less frequently than monthly the time related units such as cubic feet blocks, minimum or other charges, will be billed in accordance with the number of billing months in the meter reading interval.

LATE PAYMENT CHARGE

Payment of the Net Monthly Bill must be received in the Company's office within twenty-one (21) days from the date the bill is mailed by the Company. When not so paid, the Gross Monthly Bill, which is the Net Monthly Bill plus 2.3%, is due and payable. Customers who receive a pledge for or notice of low income assistance from an authorized agency, or another public or charitable source, will not be assessed or required to pay a late payment charge for the current bill for which the pledge or notice is received. An authorized agency is an organization in Kentucky that administers federal Low-Income Home Energy Assistance Programs and/or the Home Energy Assistance Programs offered by Duke Energy Kentucky.

Duke Energy Kentucky, Inc.
1262 Cox Road
Erlanger, Kentucky 41018

KY. P.S.C. Gas No. 2
Two-Hundred-Twenty-Eighth
Revised Sheet No. 30
Cancelling and Superseding
Two-Hundred-Twenty-Seventh
Revised Sheet No. 30
Page 2 of 2

SERVICE REGULATIONS

The supplying of, and billing for, service and all conditions applying thereto, are subject to the jurisdiction of the Kentucky Public Service Commission and to Company's Service Regulations currently in effect, as filed with the Kentucky Public Service Commission, as provided by law.

Issued by authority of an Order of the Kentucky Public Service
Commission dated December 23, 2025, in Case No. 2025-00125.
Issued: December 30, 2025
Effective: January 3, 2026
Issued by Amy B. Spiller, President /s/ Amy B. Spiller

Duke Energy Kentucky, Inc.
1262 Cox Rd.
Erlanger, Kentucky 41018

KY.P.S.C. Gas No. 2
Two-Hundred-Twenty-Eighth
Revised Sheet No. 31
Cancelling and Superseding
Two-Hundred-Twenty-Seventh
Revised Sheet No. 31
Page 1 of 2

RATE GS
GENERAL SERVICE

APPLICABILITY

Applicable to firm natural gas service, which is comprised of commodity gas supply and local delivery service, required for any purpose by an individual non-residential customer at one location when supplied at one point of delivery where distribution mains are adjacent to the premises to be served. This schedule is also applicable to non-metered natural gas commodity supplies and local delivery service for street lighting to such entities as certificated homeowners associations, businesses, and federal, state, and local governments. The Company may decline requests for service under this tariff due to gas supply limitations.

NET MONTHLY BILL

The Net Monthly Bill is determined as follows:

All gas is billed in units of 100 cubic feet (CCF)

1. Base Rate:

Customer Charge per month:	\$65.00	(l)
----------------------------	---------	-----

	<u>Delivery Rate</u>		<u>Gas Cost Adjustment</u>		<u>Total Rate</u>	
Plus a Commodity Charge for all CCF at	\$0.55629	Plus	\$0.7508	Equals	\$1.30709	(l)

2. Applicable Riders

The following riders are applicable pursuant to the specific terms contained within each rider:

Sheet No. 62, Rider DSMR, Demand Side Management Rate

Sheet No. 65, Rider WNA, Weather Normalization Adjustment Rider

Sheet No. 66, Rider PMM, Pipeline Modernization Mechanism

Sheet No. 70, Rider GCA, Gas Cost Adjustment Clause

The "Customer Charge" shown above shall be the minimum amount billed each month.

When bills are rendered less frequently than monthly the time related units such as cubic feet blocks, minimum or other charges, will be billed in accordance with the number of billing months in the meter reading interval.

LATE PAYMENT CHARGE

Payment of the Net Monthly Bill must be received in the Company's office within twenty-one (21) days from the date the bill is mailed by the Company. When not so paid, the Gross Monthly Bill, which is the Net Monthly Bill plus 2.3%, is due and payable.

TERM OF SERVICE

One year, terminable thereafter on ten (10) days written notice by either customer or Company.

Issued by authority of an Order of the Kentucky Public Service
Commission dated December 23, 2025, in Case No. 2025-00125.

Issued: December 30, 2025

Effective: January 3, 2026

Issued by Amy B. Spiller, President /s/ Amy B. Spiller

Duke Energy Kentucky, Inc.
1262 Cox Rd.
Erlanger, Kentucky 41018

KY.P.S.C. Gas No. 2
Two-Hundred-Twenty-Eighth
Revised Sheet No. 31
Cancelling and Superseding
Two-Hundred-Twenty-Seventh
Revised Sheet No. 31
Page 2 of 2

SERVICE REGULATIONS

The supplying of, and billing for, service and all conditions applying thereto, are subject to the jurisdiction of the Kentucky Public Service Commission, and to Company's Service Regulations currently in effect, as filed with the Kentucky Public Service Commission as provided by law.

Issued by authority of an Order of the Kentucky Public Service
Commission dated December 23, 2025, in Case No. 2025-00125.

Issued: December 30, 2025

Effective: January 3, 2026

Issued by Amy B. Spiller, President /s/ Amy B. Spiller

Duke Energy Kentucky
Case No. 2025-00142
STAFF First Request for Information
Date Received: December 16, 2025

STAFF-DR-01-004

REQUEST:

State whether TC Energy is required to apply for approval of the Federal Energy Regulatory Commission (FERC) to replace and abandon the transmission line. If so, state the status of any application for approval to abandon the line.

RESPONSE:

It is the Company's understanding that TC Energy filed a FERC 7C application for this work on November 10, 2025 in Docket Number CP26-19-000. The docket can be accessed at the following address, by entering the docket number:

https://elibrary.ferc.gov/eLibrary/search?docket_no=cp26-19-000&dtfrom=2025-07-06&dtto=2026-01-06&subdocket=all&searchtype=docket&daterange=past6month

PERSON RESPONSIBLE: Jeff Schucter

**Duke Energy Kentucky
Case No. 2025-00142
STAFF First Request for Information
Date Received: December 16, 2025**

STAFF-DR-01-005

REQUEST:

State whether Duke Kentucky plans to intervene or otherwise participate in any proceeding before FERC regarding the proposed replacement and abandonment of the transmission pipeline at issue.

RESPONSE:

Duke Energy Kentucky continues to monitor TC Energy's actions before FERC and has not made a decision to intervene.

PERSON RESPONSIBLE: Neil Moser

**Duke Energy Kentucky
Case No. 2025-00142
STAFF First Request for Information
Date Received: December 16, 2025**

STAFF-DR-01-006

REQUEST:

Describe TC Energy's duty to mitigate the harm to customers who will lose gas service upon abandonment of the line and TC Energy's plans to mitigate said harms.

RESPONSE:

Objection. This request seeks a legal opinion and analysis. Without waiving said objection, and to the extent discoverable, the Company is not aware of any legal duty or obligation of TC Energy to mitigate harm to Duke Energy Kentucky customers from abandoning its pipeline. Duke Energy Kentucky's understanding is that TC Energy intends to abandon the existing pipeline and is installing a new pipeline and will not allow farm taps to the new line going forward.

PERSON RESPONSIBLE: As to objection, Legal
As to response, Neil Moser

**Duke Energy Kentucky
Case No. 2025-00142
STAFF First Request for Information
Date Received: December 16, 2025**

**CONFIDENTIAL STAFF-DR-01-007
(As to Attachment only)**

REQUEST:

Provide a copy of all contracts between Duke Kentucky and TC Energy or KO Transmission regarding gas service to customers served by direct tap on a transmission pipeline.

RESPONSE:

CONFIDENTIAL PROPRIETARY TRADE SECRET (As to Attachment only)

As a local distribution company connected to TC Energy's interstate pipeline, Duke Energy Kentucky has several natural gas contracts between it and TC Energy related to interconnection and for Shipping/Transportation service of natural gas. These contracts do not directly relate to the gas service to the customers at issue with the direct tap on the TC Energy pipeline. Duke Energy Kentucky has no current contracts with KO Transmission. Please see STAFF-DR-01-007 Confidential Attachment for a copy of the FERC-approved sale agreement between KO Transmission and TC Energy.

PERSON RESPONSIBLE: Jeff Schucter

CONFIDENTIAL PROPRIETARY TRADE SECRET

CONFIDENTIAL ATTACHMENT

STAFF-DR-01-007

FILED UNDER SEAL

**Duke Energy Kentucky
Case No. 2025-00142
STAFF First Request for Information
Date Received: December 16, 2025**

**CONFIDENTIAL STAFF-DR-01-008
(As to Attachments only)**

REQUEST:

Provide a copy of all contracts concerning gas service between any of the 27 customers served by a direct tap on the transmission line at issue and TC Energy, KO Transmission, and/or Duke Kentucky.

RESPONSE:

CONFIDENTIAL PROPRIETARY TRADE SECRET (As to Attachments only)

Please see STAFF-DR-01-008 Attachments 1 through 6 for contracts found to date. The Company is continuing to research its records for additional contracts and will supplement if discovered. Many of these taps have been in existence for decades and records, if any, have been removed to off-site storage or purged in accordance with record retention policies.

PERSON RESPONSIBLE: Jeff Schuchter

CONFIDENTIAL PROPRIETARY TRADE SECRET

CONFIDENTIAL ATTACHMENT

STAFF-DR-01-008

FILED UNDER SEAL

Duke Energy Kentucky
Case No. 2025-00142
STAFF First Request for Information
Date Received: December 16, 2025

STAFF-DR-01-009

REQUEST:

Identify each option that Duke of Kentucky has considered to mitigate the harm to the 27 customers who will lose access to gas if the transmission line is abandoned.

RESPONSE:

Duke Energy Kentucky has considered the three below options:

1. Compensate the customer to convert to an alternate energy source such as propane or electric;
2. Run distribution extensions to each customer. This may require a Certificate of Public Convenience and Necessity (CPCN) for construction of new mains and extending services; and
3. Abandon the customers' service.

PERSON RESPONSIBLE: Jeff Schuchter

STAFF-DR-01-010

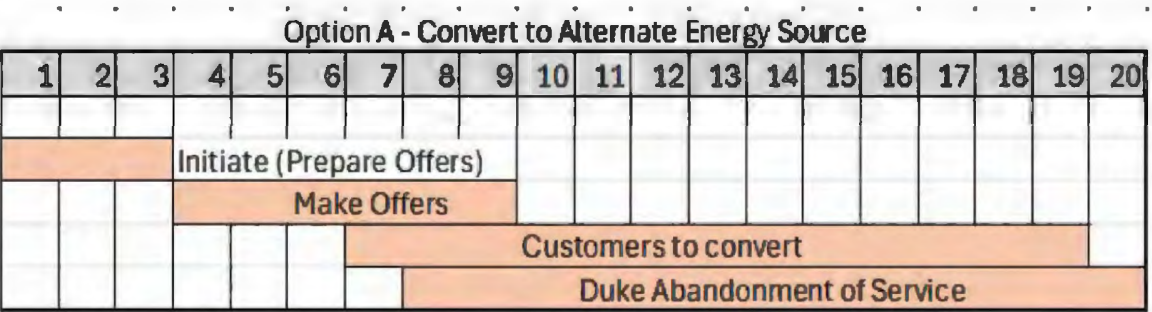
REQUEST:

Provide Duke Kentucky's expected timeline to implement each of its proposed solutions given that the transmission line will continue in operation and will not be abandoned by TC Energy until 2028.

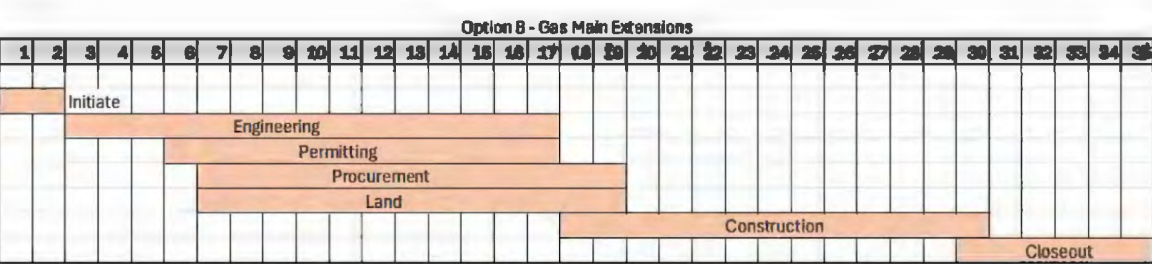
RESPONSE:

Timelines assume a start date of when Duke Energy Kentucky receives a declaratory order from the Kentucky Public Service Commission and are in months.

1. Convert to an Alternate Energy Source



2. Gas Main Extensions



3. Abandon Services

Option C - Abandon Service																			
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20
			Initiate (Prepare Abandonment Filings)																
						File for Abandonment													
						Customers to convert													
							Duke Abandonment of Service												

PERSON RESPONSIBLE: Jeff Schuchter

**Duke Energy Kentucky
Case No. 2025-00142
STAFF First Request for Information
Date Received: December 16, 2025**

STAFF-DR-01-011

REQUEST:

Identify the alternative fuel source(s) that Duke Kentucky intends to provide or pay for in a settlement agreement with the customers who cannot be connected to Duke Kentucky's existing distribution system.

RESPONSE:

Duke Energy Kentucky proposed this alternative as one of three options to the commission to offset costs associated with conversion to an energy source other than natural gas. The other two options were abandonment of service with no payment or installation of incremental distribution pipeline assets by Duke Energy Kentucky to serve these customers via typical natural gas distribution assets.

In the alternative fuel source option, selection of the alternative energy source would be the decision of the customer. The customer would choose their desired alternative fuel and would need to work with the other energy provider of their choice, which could be electric, propane, fuel oil, etc., as well as Plumbers or HVAC Contractors, to select and modify or replace current natural gas appliances with those that would use their selected alternative energy.

PERSON RESPONSIBLE: Neil Moser

Duke Energy Kentucky
Case No. 2025-00142
STAFF First Request for Information
Date Received: December 16, 2025

STAFF-DR-01-012

REQUEST:

Identify any tariff or rate changes that may be necessitated by Duke Kentucky's proposed solutions to the abandonment of the TC Energy line.

RESPONSE:

There are no immediate tariff or rate changes that will be necessary for any of the proposed solutions.

If the Company is required to extend its distribution system to all 27 customers, those costs will be included in a subsequent base rate case to recover prudently incurred costs (e.g. increase to rate base, depreciation, and property taxes) and the Company would submit new rates in that proceeding.

If the Company is required to abandon service, the costs to do so would be charged to cost of removal, and the impact would also be incorporated into a subsequent base rate case (a reduction of accumulated depreciation related to the cost of removal and a reduction to depreciation expense and property tax related to the retirement of the abandoned equipment) and the Company would submit new rates in that proceeding.

PERSON RESPONSIBLE: Jefferson “Jay” P. Brown