

**KyPSC Case No. 2025-00142**  
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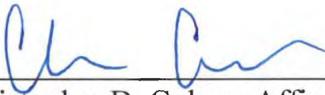
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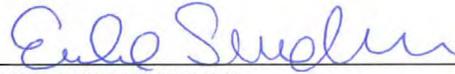
**VERIFICATION**

STATE OF OHIO                    )  
  )  
COUNTY OF HAMILTON        )        **SS:**

The undersigned, Christopher D. Colyer, Project Director, 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.

  
\_\_\_\_\_  
Christopher D. Colyer, Affiant

Subscribed and sworn to before me by Christopher D. Colyer on this 17<sup>th</sup> day of March, 2026.

  
\_\_\_\_\_  
NOTARY PUBLIC

My Commission Expires: July 8, 2027



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

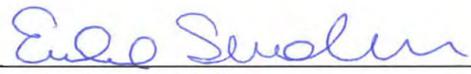
**VERIFICATION**

STATE OF OHIO                    )  
  )  
COUNTY OF HAMILTON        )        **SS:**

The undersigned, 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 17<sup>th</sup> day of March, 2026.

  
\_\_\_\_\_  
NOTARY PUBLIC

My Commission Expires: July 8, 2027

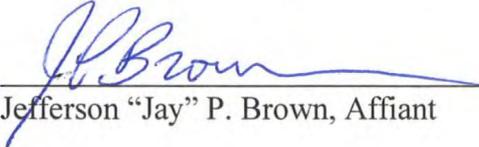


EMILIE SUNDERMAN  
Notary Public  
State of Ohio  
My Comm. Expires  
July 8, 2027

**VERIFICATION**

STATE OF OHIO                    )  
  )     SS:  
COUNTY OF HAMILTON        )

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 17<sup>th</sup> day of March, 2026.

  
\_\_\_\_\_  
NOTARY PUBLIC

My Commission Expires: July 8, 2027



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

**Duke Energy Kentucky**  
**Case No. 2025-00142**  
**MORNING SCOTT First Request for Information**  
**Date Received: March 16, 2026**

**MORNING SCOTT-DR-01-001**

**REQUEST:**

Identify all statutory, regulatory, tariff, contractual, or Commission-order authority Duke KY relies on to: (a) discontinue natural gas distribution service to existing customers; (b) require conversion to an alternative fuel; and (c) cap, abandon, or remove existing gas service lines located on or serving customer premises. Produce all cited provisions.

**RESPONSE:**

Objection. Vague and ambiguous and contains undefined terms and thus requires the company to engage in speculation and guess work as to what is meant by the term “Commission- order.” Moreover, the request is objectionable in that it seeks legal opinion. Without waiving said objection, and to extent discoverable, assuming the question is referring to the Kentucky Public Service Commission, please see the Company’s initial filing in Case No. 2025-00142 and also see KRS 278.485.

**PERSON RESPONSIBLE:**           Legal

**Duke Energy Kentucky**  
**Case No. 2025-00142**  
**MORNING SCOTT First Request for Information**  
**Date Received: March 16, 2026**

**MORNING SCOTT-DR-01-002**

**REQUEST:**

State whether Duke KY sought or obtained explicit Kentucky PSC approval to discontinue natural gas service to existing distribution customers and remove service lines. Identify all case numbers and orders.

**RESPONSE:**

Objection. This request misstates facts and is overly broad and unduly burdensome in that it seeks information that is publicly available and accessible to counsel through reasonable efforts. Without waiving said objection, and to the extent discoverable, please see the Company's initial filing in Case No. 2025-00142.

**PERSON RESPONSIBLE:**           Legal

**Duke Energy Kentucky**  
**Case No. 2025-00142**  
**MORNING SCOTT First Request for Information**  
**Date Received: March 16, 2026**

**MORNING SCOTT-DR-01-003**

**REQUEST:**

Identify the date of acquisition, the Predecessor Utility, and the Commission case number(s) approving the acquisition of the gas distribution system now serving Scott.

**RESPONSE:**

Objection. Vague and ambiguous and contains undefined terms and thus requires the company to engage in speculation and guess work as to what is meant by the term “Commission.” Moreover, the request assumes facts not in evidence and is objectionable in that it seeks legal opinion. Without waiving said objection, and to extent discoverable, assuming the question is referring to the Kentucky Public Service Commission, the Kentucky Public Service Commission did not have jurisdiction over the Predecessor Utility, as the predecessor was not a utility as the term is defined in KRS 278.010(3), and its acquisition of the Pipeline company. Furthermore, the Predecessor Utility did not acquire the gas distribution system serving Scott as there is not a “gas distribution system” currently serving Scott. Scott is served by a tap into the Pipeline company now owned by the Predecessor Utility as defined by these interrogatories. Duke Energy Kentucky is the local gas distribution company that is providing the metering service and billing from that tap into the Pipeline Company.

**PERSON RESPONSIBLE:**

As to objection, Legal  
As to response, Christopher D. Colyer

**Duke Energy Kentucky**  
**Case No. 2025-00142**  
**MORNING SCOTT First Request for Information**  
**Date Received: March 16, 2026**

**MORNING SCOTT-DR-01-004**

**REQUEST:**

Produce all acquisition-related filings (applications, testimony, stipulations, and orders) that address: (a) continued provision of gas service to existing customers; (b) expected service life and planned use of the acquired gas system; and (c) any representation regarding discontinuing service or converting customers to alternative fuels.

**RESPONSE:**

Objection. This request is overly broad and unduly burdensome in that it seeks information that is publicly available and accessible to counsel and therefore, it is interpreted as intended to harass. Without waiving said objection, and to the extent discoverable, please see the response to STAFF-DR-01-004.

**PERSON RESPONSIBLE:**           As to objection, Legal  
  As to response, Christopher D. Colyer

**Duke Energy Kentucky**  
**Case No. 2025-00142**  
**MORNING SCOTT First Request for Information**  
**Date Received: March 16, 2026**

**MORNING SCOTT-DR-01-005**

**REQUEST:**

State all obligations Duke KY assumed at acquisition concerning: (a) continued service to existing customers; (b) maintenance of service lines; and (c) honoring existing service arrangements. Include any assumption agreements or conditions in Commission orders.

**RESPONSE:**

Objection. Vague and ambiguous. Moreover, this request is objectionable insofar as it seeks legal opinions and analysis. Without waiving said objection, and to the extent discoverable, none. Please see the Company's application filed in this proceeding.

**PERSON RESPONSIBLE:**

As to objection, Legal

As to response, Christopher D. Colyer

**Duke Energy Kentucky**  
**Case No. 2025-00142**  
**MORNING SCOTT First Request for Information**  
**Date Received: March 16, 2026**

**MORNING SCOTT-DR-01-006**

**REQUEST:**

State whether Duke KY disclosed in the acquisition proceeding any plan to: (a) discontinue gas service to existing distribution customers; (b) require conversion to propane/electric; or (c) remove service lines. If not disclosed, explain why.

**RESPONSE:**

Objection. Assumes facts not in evidence. Duke Energy Kentucky did not decide to abandon and replace the pipeline to which the customers were attached. That decision was made by TC Energy.

**PERSON RESPONSIBLE:**

As to objection, Legal  
As to response, Christopher D. Colyer

**Duke Energy Kentucky**  
**Case No. 2025-00142**  
**MORNING SCOTT First Request for Information**  
**Date Received: March 16, 2026**

**MORNING SCOTT-DR-01-007**

**REQUEST:**

Describe how discontinuing gas service to customers served for 50+ years and requiring conversion is consistent with Duke KY's obligations as a successor utility under the Commission's approval and Kentucky law.

**RESPONSE:**

Objection. Seeks legal analysis and opinion.

**PERSON RESPONSIBLE:**           Legal

**Duke Energy Kentucky**  
**Case No. 2025-00142**  
**MORNING SCOTT First Request for Information**  
**Date Received: March 16, 2026**

**MORNING SCOTT-DR-01-008**

**REQUEST:**

Explain whether, and how, the purchase price or valuation in the acquisition included: (a) the gas distribution system and service lines at issue; (b) the ongoing revenue-producing use of those assets; and (c) recovery of acquisition-related costs through rates now charged to the Scott.

**RESPONSE:**

Objection. Misstates facts. Without waiving said objection, to the extent discoverable, the acquisition of the former KO Transmission by TC Energy did not include any distribution facilities owned by Duke Energy Kentucky. Duke Energy Kentucky does not have any gas distribution mains in place to serve the Scott. The Scott is served directly off the former KO Transmission pipeline. Duke Energy Kentucky's only facilities are the service line, meter, and pressure regulators that are connected to the former KO transmission pipeline that's being abandoned by TC Energy.

**PERSON RESPONSIBLE:**

As to objection, Legal  
As to response, Christopher D. Colyer

**Duke Energy Kentucky**  
**Case No. 2025-00142**  
**MORNING SCOTT First Request for Information**  
**Date Received: March 16, 2026**

**MORNING SCOTT-DR-01-009**

**REQUEST:**

Explain how Duke KY determined the \$25,000 payment amount offered to customers in exchange for: loss of gas service; mandatory conversion; and capping/removal of the gas service line. Identify whether the number originated with TC Energy or was recalculated post-acquisition.

**RESPONSE:**

When the application in this proceeding was being compiled, Duke Energy Kentucky estimated an initial amount to compensate customers for an assumed average cost per conversion of \$25,000. The \$25,000 was an estimate intended to assist the Commission's evaluation of prudence. This figure represents an estimated cost of potential re-wiring/plumbing and equipment, including the replacement of any natural gas appliances. Duke Energy Kentucky understands that every customer's situation is unique and the cost to convert might be less or more than \$25,000 depending on the situation. The \$25,000 is an estimate that could be negotiated once a final order is received in this proceeding.

**PERSON RESPONSIBLE:** Christopher D. Colyer  
Jeff Schuchter

**Duke Energy Kentucky**  
**Case No. 2025-00142**  
**MORNING SCOTT First Request for Information**  
**Date Received: March 16, 2026**

**MORNING SCOTT-DR-01-010**

**REQUEST:**

Produce all documents referencing or supporting the \$25,000 amount, including internal memoranda, cost studies, engineering analyses, vendor/contractor quotes, workpapers, presentations, emails, and communications with the Commission or third parties. If none exist, expressly state that no documented cost basis exists.

**RESPONSE:**

Please see MORNING SCOTT-DR-01-010 Attachment.

**PERSON RESPONSIBLE:** Jeff Schuchter

### Estimated Cost to Convert to Propane

	Low End	Mid	High End	
Set Tank	\$ 120.00	\$ 310.00	\$ 500.00	Tank must be 10' min from structure
Install Regulators	\$ 200.00	\$ 600.00	\$ 1,000.00	2 @ \$100/each
Line Cost from Tank to House	\$ 800.00	\$ 2,400.00	\$ 4,000.00	\$5-8/ft
Initial Fill of Propane	\$ 1,020.00	\$ 1,110.00	\$ 1,200.00	Fill is 400 gallons @ \$2.55-3.00

#### Appliance Conversion

Furnace	\$ 200.00	NA
Hot Water Heater	\$ 200.00	NA
Fireplace	\$ 200.00	NA
Stove	\$ 200.00	NA
Clothes Dryer	\$ 200.00	NA

#### New Appliances

Furnace	NA	\$ 7,500.00	\$ 15,000.00
Hot Water Heater	NA	\$ 1,500.00	\$ 3,000.00
Fireplace	NA	\$ 1,000.00	\$ 2,000.00
Stove	NA	\$ 1,250.00	\$ 2,500.00
Clothes Dryer	NA	\$ 1,250.00	\$ 2,500.00
Total Cost	\$ 3,140.00	\$ 16,920.00	\$ 31,700.00

\*cost varies depending on location of tank, size, number of appliances, if appliances can be converted, installation costs

## Estimated Cost to Convert to Electric

	Low End	Mid	High End
Electric Service Work	\$ 2,000.00	\$ 3,000.00	\$ 4,000.00
Misc. Conversions Electrical work in Home	\$ 2,000.00	\$ 3,500.00	\$ 5,000.00
New Appliances			
Furnace	\$ 6,000.00	\$ 10,500.00	\$ 15,000.00
Hot Water Heater	\$ 1,500.00	\$ 2,250.00	\$ 3,000.00
Fireplace	\$ 1,000.00	\$ 1,500.00	\$ 2,000.00
Stove	\$ 1,500.00	\$ 2,250.00	\$ 3,000.00
Clothes Dryer	\$ 1,200.00	\$ 1,850.00	\$ 2,500.00
Total Cost	\$ 15,200.00	\$ 24,850.00	\$ 34,500.00

\*cost varies depending on extent of electrical work needed, size of home, number of appliances, installation costs

**Duke Energy Kentucky**  
**Case No. 2025-00142**  
**MORNING SCOTT First Request for Information**  
**Date Received: March 16, 2026**

**MORNING SCOTT-DR-01-011**

**REQUEST:**

Identify each cost element Duke KY contends the \$25,000 covers and the assumed dollar for each: (a) appliance replacement/modification; (b) electrical service upgrades (panel, service entrance, transformer); (c) propane tank purchase/installation (above-ground/buried); (d) fuel piping, venting, and safety systems; (e) permits/inspections/code compliance; (f) site work and restoration; and (g) temporary loss of heat/hot water/operations.

**RESPONSE:**

Please see the responses to MORNING SCOTT-DR-01-009 and MORNING SCOTT-DR-01-010.

**PERSON RESPONSIBLE:** Christopher D. Colyer  
Jeff Schuchter

**Duke Energy Kentucky**  
**Case No. 2025-00142**  
**MORNING SCOTT First Request for Information**  
**Date Received: March 16, 2026**

**MORNING SCOTT-DR-01-012**

**REQUEST:**

State whether the Duke KY represents that \$25,000 is sufficient to fully convert a typical long-standing customer to propane and/or electric. If yes, identify the factual basis and the studies, quotes, or estimates relied upon.

**RESPONSE:**

Please see the responses to MORNING SCOTT-DR-01-009 and MORNING SCOTT-DR-01-010.

**PERSON RESPONSIBLE:** Christopher D. Colyer  
Jeff Schuchter

**Duke Energy Kentucky**  
**Case No. 2025-00142**  
**MORNING SCOTT First Request for Information**  
**Date Received: March 16, 2026**

**MORNING SCOTT-DR-01-013**

**REQUEST:**

Provide Duke KY's total estimated cost to convert a typical existing gas customer to propane, itemized by: appliance replacement or conversion kits; propane tank (purchase/lease, size, burial if applicable); pad or trenching; supply lines and regulators; venting and safety compliance; electrical modifications; permits and inspections; meter/distribution isolation; and site restoration.

**RESPONSE:**

Please see the responses to MORNING SCOTT-DR-01-009 and MORNING SCOTT-DR-01-010.

**PERSON RESPONSIBLE:** Christopher D. Colyer  
Jeff Schuchter

**Duke Energy Kentucky**  
**Case No. 2025-00142**  
**MORNING SCOTT First Request for Information**  
**Date Received: March 16, 2026**

**MORNING SCOTT-DR-01-014**

**REQUEST:**

State whether Duke KY acknowledges that actual propane conversion costs commonly exceed \$25,000, particularly for customers with multiple gas-fired appliances or older facilities. If Duke KY does not acknowledge this, provide all evidence supporting that position.

**RESPONSE:**

Please see the responses to MORNING SCOTT-DR-01-009 and MORNING SCOTT-DR-01-010.

**PERSON RESPONSIBLE:** Christopher D. Colyer  
Jeff Schuchter

**Duke Energy Kentucky**  
**Case No. 2025-00142**  
**MORNING SCOTT First Request for Information**  
**Date Received: March 16, 2026**

**MORNING SCOTT-DR-01-015**

**REQUEST:**

Identify any supply, delivery, or storage risks unique to propane service (supplier availability, delivery schedules, minimum purchase obligations, safety standards) and whether those risks were included in Duke KY's cost and feasibility analysis.

**RESPONSE:**

Please see the responses to MORNING SCOTT-DR-01-009 and MORNING SCOTT-DR-01-010.

**PERSON RESPONSIBLE:** Christopher D. Colyer  
Jeff Schuchter

**Duke Energy Kentucky**  
**Case No. 2025-00142**  
**MORNING SCOTT First Request for Information**  
**Date Received: March 16, 2026**

**MORNING SCOTT-DR-01-016**

**REQUEST:**

Provide Duke KY's total estimated cost to convert a typical existing gas customer to electric, including: (a) service size upgrades (ampacity), panel and feeder upgrades, grounding; (b) appliance replacement (furnace/boiler to heat pump, water heater, cooking, dryers); (c) utility-side upgrades beyond the meter (transformer/conductor capacity); (d) ventilation or building modifications; (e) permits/inspections; and (f) site restoration.

**RESPONSE:**

Please see the responses to MORNING SCOTT-DR-01-009 and MORNING SCOTT-DR-01-010.

**PERSON RESPONSIBLE:** Christopher D. Colyer  
Jeff Schuchter

**Duke Energy Kentucky**  
**Case No. 2025-00142**  
**MORNING SCOTT First Request for Information**  
**Date Received: March 16, 2026**

**MORNING SCOTT-DR-01-017**

**REQUEST:**

State whether Duke KY acknowledges that electric conversion costs frequently exceed \$25,000, particularly where substantial electrical upgrades are required. If Duke KY does not acknowledge this, provide all supporting evidence.

**RESPONSE:**

Please see the responses to MORNING SCOTT-DR-01-009 and MORNING SCOTT-DR-01-010.

**PERSON RESPONSIBLE:** Christopher D. Colyer  
Jeff Schuchter

**Duke Energy Kentucky**  
**Case No. 2025-00142**  
**MORNING SCOTT First Request for Information**  
**Date Received: March 16, 2026**

**MORNING SCOTT-DR-01-018**

**REQUEST:**

Provide any load studies or engineering assessments Duke KY performed to confirm available electric capacity for converted customers and identify who bears the cost of utility-side electric upgrades (e.g., transformer upsizing).

**RESPONSE:**

Please see the responses to MORNING SCOTT-DR-01-009 and MORNING SCOTT-DR-01-010.

**PERSON RESPONSIBLE:** Christopher D. Colyer  
Jeff Schuchter

**Duke Energy Kentucky**  
**Case No. 2025-00142**  
**MORNING SCOTT First Request for Information**  
**Date Received: March 16, 2026**

**MORNING SCOTT-DR-01-019**

**REQUEST:**

State whether Duke KY performed a site-specific conversion cost analysis for Scott before offering \$25,000. If not, explain how a uniform figure reasonably accounts for: (a) building size/use; (b) number and type of gas-fired appliances; (c) existing electric capacity; and (d) local code requirements.

**RESPONSE:**

Objection. Misstates facts. The Company has not made any offers to customers as it awaits Commission guidance. See application filed in this proceeding. Without waiving said objection and to the extent discoverable, site-specific conversion cost analysis has not yet been performed for Scott.

**PERSON RESPONSIBLE:**

As to objection, Legal  
As to response, Christopher D. Colyer  
Jeff Schuchter

**Duke Energy Kentucky**  
**Case No. 2025-00142**  
**MORNING SCOTT First Request for Information**  
**Date Received: March 16, 2026**

**MORNING SCOTT-DR-01-020**

**REQUEST:**

Produce all customer communications regarding the forced conversion, including initial and follow-up notices, conversion timelines, any statement that \$25,000 is “sufficient,” disclosure (or lack thereof) that actual costs may substantially exceed \$25,000, and any hardship, low-income, elderly, or small-business accommodations.

**RESPONSE:**

Objection. Misstates facts and assumes facts not in evidence. Without waiving said objection and to the extent discoverable, Duke Energy Kentucky stated in its Application in this proceeding that “Duke Energy Kentucky determined that a fair amount to compensate these customers for the costs of conversion to an alternate fuel is \$25,000. This figure represents the estimated costs of converting customers, potential re-wiring/plumbing and equipment, including replacement of any natural gas appliances. Contingent upon the Commission’s issuance of a declaratory order approving of this approach, Duke Energy Kentucky will contact each affected customer and offer them the \$25,000 to convert to an alternate fuel source and waive their right to request Duke Energy Kentucky provide them with natural gas service.”<sup>1</sup>

**PERSON RESPONSIBLE:** Jeff Schuchter

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<sup>1</sup> Application, p. 4.

**Duke Energy Kentucky**  
**Case No. 2025-00142**  
**MORNING SCOTT First Request for Information**  
**Date Received: March 16, 2026**

**MORNING SCOTT-DR-01-021**

**REQUEST:**

State whether Duke KY intends for Scott to bear all conversion costs exceeding \$25,000. If yes, explain how that is reasonable, just, and non-discriminatory for a customer with a history of continuous service.

**RESPONSE:**

Objection. Misstates facts. Without waiving said objection and to the extent discoverable, please see the response to MORNING SCOTT-DR-01-020.

**PERSON RESPONSIBLE:**            Jeff Schuchter

**Duke Energy Kentucky**  
**Case No. 2025-00142**  
**MORNING SCOTT First Request for Information**  
**Date Received: March 16, 2026**

**MORNING SCOTT-DR-01-022**

**REQUEST:**

Identify all costs associated with the conversion program that Duke KY proposes to: (a) include in rate base; (b) recover through base rates or riders; or (c) expense. Explain the proposed ratemaking treatment for both the \$25,000 payments and associated program/administrative costs.

**RESPONSE:**

Objection. Calls for speculation and legal conclusion. In addition, the information doesn't exist and is outside the scope of the proceeding. Without waiving said objection and to the extent discoverable, all costs should be recoverable through rates. If conversion of customers to an alternative source of energy is approved as cost of removal, the conversion costs would be recorded as cost of removal, and recorded as a credit to cash, and a debit to FERC 108 – Accumulated Depreciation. If approved as an expense, the Company has requested regulatory authority to defer the expenses and recover them in a subsequent base rate case. Costs would be recorded as a credit to cash, and a debit to a FERC 182 account. Both treatments would result in the costs being recovered through a future base rate case.

**PERSON RESPONSIBLE:**

As to objection, Legal  
As to response, Jefferson “Jay” P. Brown

**Duke Energy Kentucky**  
**Case No. 2025-00142**  
**MORNING SCOTT First Request for Information**  
**Date Received: March 16, 2026**

**MORNING SCOTT-DR-01-023**

**REQUEST:**

Provide the net book value, accumulated depreciation, and cost of removal for the gas service line and any related mains/regulators/meters to be abandoned or removed serving Scott. State how Duke KY proposes to treat any gain/loss and removal costs for ratemaking purposes.

**RESPONSE:**

The Company does not record assets as individual assets and instead depreciates assets based on group depreciation. Therefore, it is not possible to provide the individual net book value of each asset. Group depreciation of assets does not incur gains or losses for assets and therefore there would not be a gain or loss recorded as part of the retirement/removal. An individual assessment of the future removal costs of each customer has not been estimated and is not known at this time and is not at issue in this case. Please see MORNING SCOTT-DR-01-022 for a description of how costs of removal may be recorded depending on the Commission's decision in this case.

**PERSON RESPONSIBLE:**           Jefferson "Jay" P. Brown  
  Sharif S. Mitchell

**Duke Energy Kentucky**  
**Case No. 2025-00142**  
**MORNING SCOTT First Request for Information**  
**Date Received: March 16, 2026**

**MORNING SCOTT-DR-01-024**

**REQUEST:**

Explain why costs associated with removing long-existing, rate-supported gas infrastructure are not borne by Duke KY (or recovered system-wide) instead of shifted to individual customers as out-of-pocket conversion expenses.

**RESPONSE:**

Objection. Misstates facts. Seeks legal opinion. Without waiving said objection and to the extent discoverable, the Company did not state the individual customers would be responsible for any conversion expenses in this application.

**PERSON RESPONSIBLE:**

As to objection, Legal  
As to response, Jefferson "Jay" P. Brown

**Duke Energy Kentucky**  
**Case No. 2025-00142**  
**MORNING SCOTT First Request for Information**  
**Date Received: March 16, 2026**

**MORNING SCOTT-DR-01-025**

**REQUEST:**

Describe in detail Duke KY's plans to cap, abandon, or remove Scott's service line: (a) scope of work; (b) whether work occurs on private property; (c) existence and scope of easements or licenses; (d) restoration standards and obligations; and (e) allocation of all costs.

**RESPONSE:**

Objection. The request seeks information that does not exist, has not been compiled and is not maintained in the ordinary course of business.

**PERSON RESPONSIBLE:**           Legal

**Duke Energy Kentucky**  
**Case No. 2025-00142**  
**MORNING SCOTT First Request for Information**  
**Date Received: March 16, 2026**

**MORNING SCOTT-DR-01-026**

**REQUEST:**

State whether Scott's consent is required for removal/abandonment activities on private property. If not, identify the legal authority allowing Duke KY to proceed without consent and produce all supporting documents.

**RESPONSE:**

Objection. Seeks legal analysis and opinion. Without waiving said objection and to the extent discoverable, please see KRS 278.020.

**PERSON RESPONSIBLE:**           Legal

**Duke Energy Kentucky**  
**Case No. 2025-00142**  
**MORNING SCOTT First Request for Information**  
**Date Received: March 16, 2026**

**MORNING SCOTT-DR-01-027**

**REQUEST:**

Identify the schedule for removal/abandonment work, safety protocols, inspection sign-offs, and any environmental compliance required.

**RESPONSE:**

Duke Energy Kentucky has not yet developed a schedule for the items listed in the request. Duke Energy Kentucky is awaiting guidance from the Kentucky Public Service Commission in this proceeding. Depending on the guidance received from the Kentucky Public Service Commission, Duke Energy Kentucky will develop any schedules required at that time.

**PERSON RESPONSIBLE:** Jeff Schuchter

**Duke Energy Kentucky**  
**Case No. 2025-00142**  
**MORNING SCOTT First Request for Information**  
**Date Received: March 16, 2026**

**MORNING SCOTT-DR-01-028**

**REQUEST:**

Describe all alternatives Duke KY evaluated that would allow affected customers to: (a) continue gas service; (b) transfer service responsibility to another provider; (c) utilize on-site propane without mandatory removal of the gas service line; or (d) decline conversion without penalty. Provide cost comparisons and reasons for rejection.

**RESPONSE:**

Please see the Application filed in this proceeding. Duke Energy Kentucky is awaiting guidance from the Kentucky Public Service Commission to complete the entire evaluation process depending on the guidance received.

**PERSON RESPONSIBLE:**            Jeff Schuchter

**Duke Energy Kentucky**  
**Case No. 2025-00142**  
**MORNING SCOTT First Request for Information**  
**Date Received: March 16, 2026**

**MORNING SCOTT-DR-01-029**

**REQUEST:**

Explain how forcing long-standing customers to abandon gas service, incur conversion costs that substantially exceed \$25,000, and permit removal of service lines is reasonable, just, and non-discriminatory.

**RESPONSE:**

Objection. Calls for speculation, argumentative, and seeks legal opinion.

**PERSON RESPONSIBLE:**           Legal

**Duke Energy Kentucky**  
**Case No. 2025-00142**  
**MORNING SCOTT First Request for Information**  
**Date Received: March 16, 2026**

**MORNING SCOTT-DR-01-030**

**REQUEST:**

Identify all third-party contractors or vendors (engineering, electricians, plumbers/HVAC, propane suppliers) Duke KY relied on for cost estimates or intends to use for conversions. Provide RFPs, bids, contracts, and unit pricing.

**RESPONSE:**

Please see the responses to MORNING SCOTT-DR-01-009 and MORNING SCOTT-DR-01-010.

**PERSON RESPONSIBLE:** Christopher D. Colyer  
Jeff Schuchter

**Duke Energy Kentucky**  
**Case No. 2025-00142**  
**MORNING SCOTT First Request for Information**  
**Date Received: March 16, 2026**

**MORNING SCOTT-DR-01-031**

**REQUEST:**

State whether the \$25,000 figure was constrained by budget, policy, or optics (e.g., per-customer cap) rather than engineering or market pricing. If yes, produce documents so indicating.

**RESPONSE:**

No. Please see responses to MORNING SCOTT-DR-01-009 and MORNING SCOTT-DR-01-010.

**PERSON RESPONSIBLE:** Christopher D. Colyer  
Jeff Schuchter

**Duke Energy Kentucky  
Case No. 2025-00142  
MORNING SCOTT First Request for Information  
Date Received: March 16, 2026**

**MORNING SCOTT-DR-01-032**

**REQUEST:**

State whether Duke KY acknowledges that actual propane or electric conversion costs may substantially exceed \$25,000 for many customers and, if so, identify the expected cost range and explain why customers must proceed regardless.

**RESPONSE:**

Objection. Duplicative and harassing in nature.

**PERSON RESPONSIBLE:**           Legal

**Duke Energy Kentucky**  
**Case No. 2025-00142**  
**MORNING SCOTT First Request for Information**  
**Date Received: March 16, 2026**

**MORNING SCOTT-DR-01-033**

**REQUEST:**

Produce any map, drawing or other document showing the location of the 27 customers identified in the Verified Application.

**RESPONSE:**

Objection. Without waiving said objection and to the extent discoverable, Duke Energy Kentucky has filed maps in this proceeding under seal and pursuant to a motion for confidential treatment. Duke Energy Kentucky will share confidential information with parties who enter into a confidentiality agreement, but reserve the right to refuse to disclose any confidential information to any party that could be a competitor of Duke Energy Kentucky and could use the information to cause competitive harm to Duke Energy Kentucky.

**PERSON RESPONSIBLE:**           Legal

**Duke Energy Kentucky**  
**Case No. 2025-00142**  
**MORNING SCOTT First Request for Information**  
**Date Received: March 16, 2026**

**MORNING SCOTT-DR-01-034**

**REQUEST:**

Produce any map, drawing or other document showing the distance from or relative location of the 27 customers identified in the Verified Application in relation to “Duke Energy Kentucky’s existing infrastructure” described on page 3 of the Verified Application.

**RESPONSE:**

Please see the response to MORNING SCOTT-DR-01-033.

**PERSON RESPONSIBLE:**           Legal

**Duke Energy Kentucky**  
**Case No. 2025-00142**  
**MORNING SCOTT First Request for Information**  
**Date Received: March 16, 2026**

**MORNING SCOTT-DR-01-034[sic]**

**REQUEST:**

State the distance between property owned by Scott to “Duke Energy Kentucky’s existing infrastructure” described on page 3 of the Verified Application.

**RESPONSE:**

Approximately 0.8 miles.

**PERSON RESPONSIBLE:**            Jeff Schuchter

**Duke Energy Kentucky**  
**Case No. 2025-00142**  
**MORNING SCOTT First Request for Information**  
**Date Received: March 16, 2026**

**MORNING SCOTT-DR-01-035**

**REQUEST:**

Produce all documents filed in the record in this action under seal.

**RESPONSE:**

Duke Energy Kentucky will provide copies of all confidential materials upon Morning Scott's execution of a confidentiality agreement with the Company. However, Duke Energy Kentucky reserves the right to refuse to provide any confidential information to a party that could be considered a competitor of Duke Energy Kentucky and could use the confidential information to cause competitive harm to Duke Energy Kentucky.

**PERSON RESPONSIBLE:**           Legal

**Duke Energy Kentucky**  
**Case No. 2025-00142**  
**MORNING SCOTT First Request for Information**  
**Date Received: March 16, 2026**

**MORNING SCOTT-DR-01-036**

**REQUEST:**

Produce any communications with TC Energy concerning the matters raised in the Verified Application.

**RESPONSE:**

Objection. Duplicative and harassing in nature. Without waiving said objection and to the extent discoverable, please see the response to STAFF-DR-02-009.

**PERSON RESPONSIBLE:**            Jeff Schuchter

**Duke Energy Kentucky  
Case No. 2025-00142  
MORNING SCOTT First Request for Information  
Date Received: March 16, 2026**

**CONFIDENTIAL MORNING SCOTT-DR-01-037  
(As to Attachment only)**

**REQUEST:**

Produce any document discussing or showing the initial connection between the Pipeline and the property owned by Scott.

**RESPONSE:**

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

Duke Energy Kentucky has no documents discussing the initial connection between the pipeline and the property owned by Scott. Duke Energy Kentucky is providing MORNING SCOTT-DR-01-037 Confidential Attachment.

**PERSON RESPONSIBLE:** Jeff Schuchter

**CONFIDENTIAL PROPRIETARY TRADE SECRET**

**CONFIDENTIAL ATTACHMENT**

**SCOTT DR-01-037**

**FILED UNDER SEAL**