

KyPSC Case No. 2025-00142
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VERIFICATION

STATE OF OHIO)
) SS:
COUNTY OF HAMILTON)

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 supplemental 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 30th day of March, 2026.



NOTARY PUBLIC

My Commission Expires: July 8, 2027



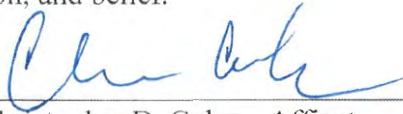
EMILIE SUNDERMAN
Notary Public
State of Ohio
My Comm. Expires
July 8, 2027

VERIFICATION

STATE OF OHIO)
)
COUNTY OF HAMILTON)

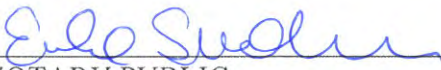
SS:

The undersigned, Christopher D. Colyer, Project Director, being duly sworn, deposes and says that he has personal knowledge of the matters set forth in the foregoing supplemental 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 30th 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

SUPPLEMENTAL 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.

SUPPLEMENTAL RESPONSE:

The request seeks documents. The document provided is the only document that was created in support of the \$25,000 amount. The information was derived through telephone conversations with a propane supplier, plumber, and through online research, including home supply websites to provide a high-level estimate of costs to convert. The spreadsheet provided is the sole workpaper.

ORIGINAL RESPONSE:

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

PERSON RESPONSIBLE: Jeff Schuchter

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

SUPPLEMENTAL 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).

SUPPLEMENTAL RESPONSE:

The Company did not perform a study for electric capacity availability. The response referenced the only study that was performed. If customers are converted, the individual customer could choose whether or not it would be to electric or another fuel source. The property at 2895 Baynum Hill Road is not in Duke Energy Kentucky's electric service territory and would not be a Duke Energy Kentucky customer if converted to electric.

ORIGINAL 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

SUPPLEMENTAL 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.

SUPPLEMENTAL RESPONSE:

The question requests “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.” As stated in the Company’s response, the question misstates facts. There has not been any forced conversion to date. The Company has not made any statements regarding the \$25,000 is “sufficient.” Therefore, there is nothing responsive to this question. Nonetheless, the Company acknowledges that in accordance with the Commission’s Order dated December 16, 2025, Duke Energy Kentucky was ordered to “serve by first class mail copies of its application for a declaratory Order and this Order on each of its customers who will lose gas service if the TC Energy transmission pipeline is abandoned no later than 1/05/2026.” Duke Energy Kentucky objects to providing copies of each and every notice to each and every customer as being overly broad, unduly

burdensome, and irrelevant. A copy of this notice sent to the property at 2895 Baynum Hill Road is provided as MORNING SCOTT-DR-01-020 Supplemental Attachment.

ORIGINAL 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.”¹

PERSON RESPONSIBLE: Jeff Schuchter

¹ Application, p. 4.

HONAKER
LAW
OFFICE

Meredith L. Cave
(859) 368-8803
meredith@hloky.com.com

January 5, 2026

RE: *Electronic Application of Duke Energy Kentucky, Inc. for a Declaratory Order Regarding Recovery of Costs to Convert Customers to Alternate Source of Fuel*, Case No. 2025-00142

Dear Duke Energy Kentucky Customer:

This firm represents Duke Energy Kentucky, Inc. (“Duke Energy”). As you may already know, Duke Energy filed an application in the above referenced matter with the Kentucky Public Service Commission (“PSC”) and the PSC ordered that you receive notice of the application. A copy of the order is attached and a copy of the application was mailed to you on January 2, 2026. Duke Energy is seeking guidance from the PSC regarding TC Energy’s actions resulting in the abandonment of the transmission line to which you are connected. Duke Energy intends for you to continue receiving service whether it be by natural gas or an alternate source. Duke Energy will be in touch with you regarding the Commission’s decision.

Kind regards,



Meredith L. Cave

Enclosure

HONAKER
LAW
OFFICE

Meredith L. Cave
(859) 368-8803
meredith@hloky.com.com

January 7, 2026

RE: *Electronic Application of Duke Energy Kentucky, Inc. for a Declaratory Order Regarding Recovery of Costs to Convert Customers to Alternate Source of Fuel*, Case No. 2025-00142

Dear Duke Energy Kentucky Customer:

This firm represents Duke Energy Kentucky, Inc. (“Duke Energy”). As you may already know, Duke Energy filed an application in the above referenced matter with the Kentucky Public Service Commission (“PSC”) and the PSC ordered that you receive notice of the application. A copy of the order is attached and a copy of the application was mailed to you on January 2, 2026. Duke Energy is seeking guidance from the PSC regarding TC Energy’s actions resulting in the abandonment of the transmission line to which you are connected. Duke Energy intends for you to continue receiving service whether it be by natural gas or an alternate source. Duke Energy will be in touch with you regarding the Commission’s decision.

Kind regards,



Meredith L. Cave

Enclosure

HONAKER
LAW
OFFICE

Meredith L. Cave
(859) 368-8803
meredith@hloky.com.com

January 9, 2026

RE: *Electronic Application of Duke Energy Kentucky, Inc. for a Declaratory Order Regarding Recovery of Costs to Convert Customers to Alternate Source of Fuel*, Case No. 2025-00142

Dear Duke Energy Kentucky Customer:

This firm represents Duke Energy Kentucky, Inc. (“Duke Energy”). As you may already know, Duke Energy filed an application in the above referenced matter with the Kentucky Public Service Commission (“PSC”) and the PSC ordered that you receive notice of the application. A copy of the application and order is enclosed. Duke Energy is seeking guidance from the PSC regarding TC Energy’s actions resulting in the abandonment of the transmission line to which you are connected. Duke Energy intends for you to continue receiving service whether it be by natural gas or an alternate source. Duke Energy will be in touch with you regarding the Commission’s decision.

Kind regards,



Meredith L. Cave

Enclosure

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

SUPPLEMENTAL 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.

SUPPLEMENTAL RESPONSE:

The Company objects to this request to the extent it is seeking a legal opinion. Without waiving said objection, and to the extent discoverable, the Company estimated \$25,000 as a reasonable and average cost of conversion to an alternative fuel source and presented that to the Commission as a lower cost alternative to extending a natural gas main. If the Commission determines in this proceeding that the Company should proceed with the lower cost conversion to an alternative source of fuel, versus extending natural gas mains to continue service, and if a customer has evidence that the costs to convert will exceed \$25,000, the Company will evaluate that information. The Company is willing to work with the customer to determine the appropriate amount to cover the actual cost to convert to the alternative fuel. However, this is contingent upon receiving the requested guidance from the Commission in this proceeding that the alternative fuel conversion is the appropriate remedy.

ORIGINAL 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

SUPPLEMENTAL 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.

SUPPLEMENTAL RESPONSE:

Duke Energy Kentucky has not retained any contractors or vendors to perform conversion work. The Commission has not yet issued a decision in this case as to whether or not the Company's request will be granted. The cost estimates were obtained through informal telephone conversations with a propane supplier, plumber, and through online research, including home supply websites to provide a high-level estimate of costs to convert. The Company personnel who made the estimate did not document these conversations, which occurred more than a year ago.

ORIGINAL 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

SUPPLEMENTAL 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.

SUPPLEMENTAL RESPONSE:

The information requested is contained in the KyPSC Presentation filed under seal on November 17, 2025 and will be provided in accordance with the confidentiality agreement executed between Morning Scott and the Company.

ORIGINAL 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

SUPPLEMENTAL 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.

SUPPLEMENTAL RESPONSE:

The information requested is contained in the KyPSC Presentation filed under seal on November 17, 2025 and will be provided in accordance with the confidentiality agreement executed between Morning Scott and the Company.

ORIGINAL 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

SUPPLEMENTAL MORNING SCOTT-DR-01-035

REQUEST:

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

SUPPLEMENTAL RESPONSE:

After Duke Energy Kentucky filed its responses to Morning Scott's data requests, Morning Scott requested an NDA which the Company provided. Morning Scott signed the NDA on late Wednesday afternoon, March 25, 2026 and Duke Energy Kentucky executed it on Thursday morning, March 26, 2026. The Company began providing the confidential information in the afternoon of March 26, 2026. Due to some of the documents containing customer specific information not pertaining to Morning Scott, Duke Energy Kentucky had to redact some of the documents and is providing those documents with these responses.

ORIGINAL 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

SUPPLEMENTAL MORNING SCOTT-DR-01-036

REQUEST:

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

SUPPLEMENTAL RESPONSE:

The attachment to STAFF-DR-02-009 as referenced in the Company's response to MORNING SCOTT-DR-01-036 includes written communication between Duke Energy Kentucky and TC Energy related to TC Energy's Gateway Project, which is resulting in the abandonment of TC Energy's pipeline and thus prompting Duke Energy Kentucky's Application in these proceedings. This information has already been provided to Morning Scott in accordance with the executed confidentiality agreement.

ORIGINAL 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