

**COMMONWEALTH OF KENTUCKY**  
**BEFORE THE PUBLIC SERVICE COMMISSION**

**IN THE MATTER OF:**

**ELECTRONIC APPLICATION OF DUKE ENERGY )**  
**KENTUCKY, INC. FOR A DECLARATORY ORDER ) CASE NO. 2025-00142**  
**REGARDING RECOVERY OF COSTS TO )**  
**TO CONVERT CUSTOMERS TO ALTERNATE )**  
**SOURCE OF FUEL )**

**FIRST REQUEST FOR INFORMATION OF MORNING SCOTT, LLC**

Comes now, Morning Scott, LLC (“Scott”), by and through counsel, and submits its First Request for Information to Duke Energy Kentucky, Inc., (“Duke KY”), to be answered by March 23, 2026, as specified in the Commission’s Order dated March 10, 2026, and in accordance with the following instructions:

**DEFINITIONS**

Unless otherwise specified in each individual interrogatory or request, “you,” “your,” the “Company,” or “Duke KY,” refers to KO Transmission, a Duke Energy Corporation subsidiary also known as Duke Energy Kentucky, Inc., and its affiliates, directors, officers, employees, consultants, attorneys, and authorized agents.

Unless otherwise specified in each individual interrogatory or request, the “Predecessor Utility,” or “TC” refers to TC Energy, and its affiliates, directors, officers, employees, consultants, attorneys, and authorized agents.

Unless otherwise specified in each individual interrogatory or request, the “Pipeline” refers to the “KO Transmission Pipeline” as described on page 1 of the Verified Application.

“And” and “or” shall be construed either conjunctively or disjunctively as required by the

context to bring within the scope of these interrogatories and requests for production of documents any information which might be deemed outside their scope by another construction.

“Any” means all, each and every example of the requested information.

“Communication” means any transmission or exchange of information between two or more persons, whether orally or in writing, and includes, without limitation, any conversation or discussion by means of letter, telephone, note, memorandum, telegraph, telex, telecopy, cable, email, or any other electronic or other medium.

“Control” means, without limitation, that a document is deemed to be in your control if you have the right to secure the document or a copy thereof from another person or public or private entity having actual possession thereof. If a document is responsive to a request, but is not in your possession or custody, identify the person with possession or custody. If any document was in your possession or subject to your control, and is no longer, state what disposition was made of it, by whom, the date on which such disposition was made, and why such disposition was made.

“Document” refers to written matter of any kind, regardless of its form, and to information recorded on any storage medium, whether in electrical, optical or electromagnetic form, and capable of reduction to writing by the use of computer hardware and software, and includes all copies, drafts, proofs, both originals and copies either (1) in the possession, custody or control of Duke KY regardless of where located, or (2) produced or generated by, known to or seen by Duke KY, but now in their possession, custody or control, regardless of where located whether or still in existence. Such “documents” shall include, but are not limited to, applications, permits, monitoring reports, computer printouts, contracts, leases, agreements, papers, photographs, tape recordings, transcripts, letters or other forms of correspondence, folders or similar containers, programs, telex, TWX and other teletype communications, memoranda, reports, studies, summaries, minutes,

minute books, circulars, notes (whether typewritten, handwritten or otherwise), agenda, bulletins, notices, announcements, instructions, charts, tables, manuals, brochures, magazines, pamphlets, lists, logs, telegrams, drawings, sketches, plans, specifications, diagrams, drafts, books and records, formal records, notebooks, diaries, registers, analyses, projections, email correspondence or communications and other data compilations from which information can be obtained (including matter used in data processing) or translated, and any other printed, written, recorded, stenographic, computer-generated, computer-stored, or electronically stored matter, however and by whomever produced, prepared, reproduced, disseminated or made. For purposes of the production of “documents,” the term shall include copies of all documents being produced, to the extent the copies are not identical to the original, thus requiring the production of copies that contain any markings, additions or deletions that make them different in any way from the original.

“Identify” means:

a. With respect to a person, state the person’s name, address and business relationship (e.g., “employee”) with Duke KY;

b. With respect to a document, to state the nature of the document in sufficient detail for identification in a request for production, its date, its author, and to identify its custodian. If the information or document identified is recorded in electrical, optical or electromagnetic form, identification includes a description of the computer hardware or software required to reduce it to readable form.

“Person” means, without limitation, every natural person, corporate entity, partnership, association (formal or otherwise), joint venture, unit operation, cooperative, municipality, commission, governmental body or agency.

“Relating to” or “concerning” means and includes pertaining to, referring to, or having as

a subject matter, directly or indirectly, expressly or implied, the subject matter of the specific request.

“Workpapers” are defined as original, electronic, machine-readable, unlocked, in native format, and with formulae and links intact.

### **INSTRUCTIONS**

1. The Definitions, Instructions, and Claim of Privilege set out in this Request for Information apply to these questions.

2. In answering these questions, furnish all information that is available to you, including information in the possession of your agents, employees, and representatives, all others from whom you may freely obtain it, and your attorneys and their investigators.

3. Please answer each question based upon your knowledge, information, or belief, and any answer that is based upon information or belief should state that it is given on that basis.

4. If you have possession, custody, or control of the originals of these documents requested, please produce the originals or a complete copy of the originals and all copies that are different in any way from the original, whether by interlineation, receipt stamp, or notation.

5. If you do not have possession, custody, or control of the originals of the documents requested, please produce copies of the documents, however made, in your possession, custody, or control. If any document requested is not in your possession or subject to your control, please explain why not, and give the present location and custodian of any copy or summary of the document.

6. If any question appears confusing, please request clarification from the undersigned counsel.

7. In providing your responses, please start each response on a separate page and type, at the top of the page, the question that is being answered.

8. As part of the response to each question, please state, at the bottom of the answer, the name and job position of each person who participated in any way, other than providing clerical assistance, in the preparing of the answer. If the question has sub-parts, please identify the person or persons by sub-part. Please also state the name of the witness in this docket who will sponsor the answer to the question and who can vouch for the truth of the answer. If the question has sub-parts, please identify the witness or witnesses by sub-part.

9. Rather than waiting to provide all of the responses at the same time, please provide individual responses as each becomes available.

10. Wherever the response to a request for information consists of a statement that the requested information is already available to Scott, please provide a detailed citation to the document that contains the information. The citation shall include the title of the document, relevant page number(s), and to the extent possible paragraph number(s) and/or chart(s)/table(s)/figure number(s).

11. In the event that any document referred to in response to any request for information has been destroyed, specify the date and the manner of such destruction, the reason for such destruction, the person authorizing the destruction and the custodian of the document at the time of its destruction.

12. These questions are continuing in nature. If there is a change in circumstances or facts or if you receive or generate additional information that changes your answer between the time of your original response and the time of the hearings, then you should submit, under oath, a supplemental response to your earlier answer.

13. If you consider any question to be unduly burdensome, or if the response would require the production of a voluminous amount of material, please call the undersigned counsel as soon as possible in order to discuss the situation and to try to resolve the problem. Likewise, if you object to any of the questions on the grounds that the question seeks confidential information, or on any other grounds, please call the undersigned counsel as soon as possible.

14. If the response to any question is voluminous, please provide separately an index to the materials contained in the response.

15. If the information requested is included in previously furnished exhibits, workpapers, or responses to other discovery inquiries or otherwise, in hard copy or electronic format, please furnish specific references thereto, including Bates Stamp page citations and detailed cross-references.

16. Data should be provided in native electronic format including active EXCEL workbooks and all linked workbooks, with all formulas, cell references, links, etc., intact, functioning, and complete for all tables, figures, and attachments in the testimony.

17. To the extent that a question asks for the production of copyrighted material, it is sufficient to provide a listing of such material, indicating the title, publisher, author, edition, and page references relied on or otherwise relevant to the question.

18. Scott reserves the right to serve supplemental, revised, or additional information requests as permitted in this proceeding.

### **PRIVILEGE**

If you claim a privilege including, but not limited to, the attorney-client privilege or the work product doctrine, as grounds for not fully and completely responding to any request for information or request for production, describe the basis for your claim of privilege in sufficient

detail so as to permit meaningful evaluation of the validity of the claim. With respect to documents for which a privilege is claimed, produce a “privilege log” that identifies the author, recipient, date and subject matter of the documents or interrogatory answers for which you are asserting a claim of privilege and any other information pertinent to the claim that would likewise enable evaluation of the validity of such claims.

## **REQUESTS FOR INFORMATION**

### **Request No. 1**

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.

### **Request No. 2**

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.

### **Request No. 3**

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.

### **Request No. 4**

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.

**Request No. 5**

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.

**Request No. 6**

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.

**Request No. 7**

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.

**Request No. 8**

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.

**Request No. 9**

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.

**Request No. 10**

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.

**Request No. 11**

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.

**Request No. 12**

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.

**Request No. 13**

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.

**Request No. 14**

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.

**Request No. 15**

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.

**Request No. 16**

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.

**Request No. 17**

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.

**Request No. 18**

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).

**Request No. 19**

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.

**Request No. 20**

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.

**Request No. 21**

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.

**Request No. 22**

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.

**Request No. 23**

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.

**Request No. 24**

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.

**Request No. 25**

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.

**Request No. 26**

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.

**Request No. 27**

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

**Request No. 28**

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.

**Request No. 29**

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.

**Request No. 30**

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.

**Request No. 31**

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.

**Request No. 32**

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.

**Request No. 33**

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

**Request No. 34**

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.

**Request No. 34**

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

**Request No. 35**

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

**Request No. 36**

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

**Request No. 37**

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

Respectfully submitted,

*/s/ Mickey T. Webster*

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Mickey T. Webster

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**CERTIFICATE OF SERVICE**

This is to certify that foregoing electronic filing was transmitted to the Commission on March 16, 2026, and that it has been served upon the following counsel of record by electronic means in compliance with 805 KAR 5:001(4)(8):

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