

KyPSC Case No. 2026-00086
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Duke Energy Kentucky
Case No. 2026-00086
STAFF First Request for Information
Date Received: April 27, 2026

STAFF-DR-01-001

REQUEST:

Refer to the Direct Testimony of David A. Klein (Klein Direct Testimony), page 3, lines 19-20. Provide the following information:

- a. The actual final cost of Phases One, Two, and Three;
- b. The estimated cost of Phases Four and Five; and
- c. The actual or estimated mileage of each of the five phases.

RESPONSE: Please see table below for all of the requested information. The “Length” column refers to the length of the pipeline built in each Phase, not to the lengths that were being replaced.

	Length (miles)	Final Cost	Estimated Cost
Phase 1	2.94	\$50,019,211	N/A
Phase 2	3.65	\$49,553,913	N/A
Phase 3	3.50	\$53,724,951	N/A
Phase 4	2.19	TBD	\$42,500,000
Phase 5	2.02	TBD	\$34,890,000

PERSON RESPONSIBLE: David A. Klein

**Duke Energy Kentucky
Case No. 2026-00086
STAFF First Request for Information
Date Received: April 27, 2026**

STAFF-DR-01-004

REQUEST:

Refer to the Klein Direct Testimony, page 4, lines 12-15. Confirm whether Duke Kentucky has analyzed the prospect of relying entirely on public rights-of-way if private easements are not feasible and how that would impact the project.

RESPONSE:

Analyzing the prospect of installing entirely on public rights-of-way was not considered to be a practically viable option, due in part to the need to connect the tie in points installed in Phase 2 and Phase 3. There is not a feasible continuous public right-of-way between the tie points to replace the existing AM07.

Private easements are feasible. Locating 91.1% of the route in private easements will minimize the overall length, increase installation production, decrease potential for third-party damages, and ultimately decrease overall project cost.

PERSON RESPONSIBLE: David A. Klein

**Duke Energy Kentucky
Case No. 2026-00086
STAFF First Request for Information
Date Received: April 27, 2026**

STAFF-DR-01-005

REQUEST:

Refer to the Klein Direct Testimony, page 9. Provide a detailed cost breakdown of each task in the second table.

RESPONSE:

Please see previously provided Confidential Attachment DAK-1 to the Direct Testimony of David A. Klein, filed on March 31, 2026, for cost breakdown.

PERSON RESPONSIBLE: David A. Klein

Duke Energy Kentucky
Case No. 2026-00086
STAFF First Request for Information
Date Received: April 27, 2026

STAFF-DR-01-006

REQUEST:

Refer to the Klein Direct Testimony, page 10, line 9. Provide the breakdown of the incremental cost of \$10,000 per year and explain how it is calculated.

RESPONSE:

Quarterly line inspections <\$2,000 per inspection (4 times a year)

Annual cathodic protection maintenance (\$1,000-1,500 once a year)

The annual ongoing cost of operation is inclusive of periodic testing/inspections. The only outlier to this is in-line inspection work that is completed every seven (7) years on the pipeline. This work is not included in the cost of the annual operating costs.

PERSON RESPONSIBLE: David A. Klein

Duke Energy Kentucky
Case No. 2026-00086
STAFF First Request for Information
Date Received: April 27, 2026

STAFF-DR-01-007

REQUEST:

Refer to the Klein Direct Testimony, page 11, lines 10-11 and page 13, lines 5-7. Provide a detailed cost breakdown of the estimated \$11 million for hydro pressure testing, and \$400,000-\$500,000 of typical in-line inspection (ILI).

RESPONSE:

\$11 million for hydro pressure testing

Estimated cost is based off historical averages for retrofit (for hydro pressure testing) of a 24” pipeline on a per mile basis. It includes the following categories of costs: engineering, permitting, land costs, materials and equipment, construction services, inspections, testing, direct labor, overheads, and AFUDC.

\$400,00-\$500,000 typical in-line inspection

This represents the historical average costs to facilitate in-line inspection of a 24” pipeline. This includes the following categories of costs, permitting, land costs/support, materials, and equipment, construction services, inspections, direct labor, and overheads.

This does not include the cost for any retrofit work that is found as a result of the in-line inspection itself.

PERSON RESPONSIBLE: David A. Klein