KyPSC Case No. 2026-00112
TABLE OF CONTENTS

DATA REQUEST	WITNESS	TAB NO.
STAFF-DR-01-001	Megan J. Riley	1
STAFF-DR-01-002	Megan J. Riley	2
STAFF-DR-01-003	David A. Klein	3
STAFF-DR-01-004	Jefferson "Jay" P. Brown	4
STAFF-DR-01-005	Megan J. Riley	5
STAFF-DR-01-006	David A. Klein	6
STAFF-DR-01-007	David A. Klein	7
STAFF-DR-01-008	Jefferson "Jay" P. Brown David A. Klein	8

VERIFICATION

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

The undersigned, Jefferson "Jay" P. Brown, being duly sworn, deposes and says 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.

JP Brown
Jefferson "Jay" P. Brown, Affiant

Subscribed and sworn to before me by Jefferson "Jay" P. Brown on this 12th day of June, 2026.

Emilie Sunderman
NOTARY PUBLIC

My Commission Expires: July 8, 2027

NOTARY PUBLIC STATE OF OHIO

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

VERIFICATION

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

The undersigned, David A. Klein, Senior Project Manager, being duly sworn, deposes and says 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.

David A. Klein, Affiant

Subscribed and sworn to before me by David A. Klein on this 16th day of June, 2026.

ADELE M. FRISCH, NOTARY PUBLIC
COMM. EXP. JANUARY 5, 2029
STATE OF OHIO

Adele M. Frisch
NOTARY PUBLIC

My Commission Expires: 1/5/2029

VERIFICATION

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

The undersigned, Megan J. Riley, GM Engineering, Planning & Pipeline Integrity, being duly sworn, deposes and says that she 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 her knowledge, information, and belief.

Megan J. Riley, Affiant

Subscribed and sworn to before me by Megan J. Riley on this 22ND day of June, 2026.

ADELE M. FRISCH, NOTARY PUBLIC
COMM. EXP. JANUARY 5, 2029
STATE OF OHIO

Adele M. Frisch
NOTARY PUBLIC

My Commission Expires: 1/5/2029

Duke Energy Kentucky
Case No. 2026-00112
STAFF First Request for Information
Date Received: June 9, 2026

STAFF-DR-01-001

REQUEST:

Refer to Application, pages 2-3, paragraph 5.

a. Provide current customer demand and forecasted demand for the next five years in total and broken down by the three customer segments.

b. Provide current system capacity calculations and projected capacity under the proposed extension in total and broken down by the three customer segments.

RESPONSE:

a. Duke Energy Kentucky does not prepare forecasts by customer segment. The current customer demand is 184,032 DT/d. The design day forecast for Duke Energy Kentucky for the next five years is as follows:

Year	DT/d
2027	184,877
2028	185,727
2029	186,586
2030	187,431
2031	188,354

b. The current capacity of the UL07 system is approximately 8,750 DT/d, the future capacity with the UL45 Extension will be approximately 12,000 DT/d. Gas is commingled in the system with other supply sources, it is not possible to accurately determine customer segments served.

PERSON RESPONSIBLE: Megan J. Riley

Duke Energy Kentucky
Case No. 2026-00112
STAFF First Request for Information
Date Received: June 9, 2026

STAFF-DR-01-002

REQUEST:

Refer to Application, page 3, paragraphs 5 and 7.

a. Explain how the proposed project increases capacity.

b. Explain how the proposed project reduces pressure losses and provides necessary inlet pressures to local delivery stations.

c. Describe any other option that was considered to achieve the improvements referenced above and why those were not chosen.

d. Provide cost estimates for any other options that were considered.

RESPONSE:

a. Currently gas flows from pipeline AM03 thru the 4” diameter UL07 pipeline to reach the existing UL45 pipeline. UL07 is utilized to its maximum capacity and is experiencing high pressure losses from the demand. As proposed, the UL45 pipeline extension will provide an alternative path for gas to flow directly from AM03. This will reduce demand, and pressure losses, on the UL07 pipeline. This will increase gas capacity by allowing more gas to flow through the pipeline without experiencing pressure loss.

b. See response to (a) above.

c. This project was identified because of the high pressure losses in UL07 and was seen as the most straightforward mitigation. No other improvements were seen as viable.

d. N/A; see response to (c) above.

PERSON RESPONSIBLE: Megan J. Riley

Duke Energy Kentucky
Case No. 2026-00112
STAFF First Request for Information
Date Received: June 9, 2026

CONFIDENTIAL STAFF-DR-01-003
(As to Attachment (b)(1) only)

REQUEST:

Refer to Application, page 4, paragraph 10, page 7, paragraph 16, and Confidential Exhibit 4.

a. Explain how Duke Kentucky determined where the proposed pipeline should be built.

b. Describe any other routes that were considered and why those were not chosen.

c. Provide cost estimates for any other routes that were considered.

RESPONSE:

CONFIDENTIAL PROPRIETARY TRADE SECRET
(As to Attachment (b)(1) only)

a. With the goal of the proposed line being to connect AM03 and UL07, the proposed route was determined through conversations and negotiations with landowners.

b. Please see STAFF-DR-01-003(b) Confidential Attachment 1and STAFF-DR-01-003(b) Attachment 2 for depictions of routes that were considered but not selected. The route depicted on STAFF-DR-01-003(b) Confidential Attachment 1 was not selected due to its anticipated direct impact on existing and proposed developments; it would also have been longer than the ultimately-selected route. The route depicted on STAFF-DR-01-003(b) Attachment 2, within the road ROW of Harris Pike, was considered, but ultimately not pursued due to the constructability challenges along the road and the potential of a road widening project.

c. Given the considerations identified in part (b), no other routes, apart from the selected route, developed enough to establish cost estimates.

PERSON RESPONSIBLE: David A. Klein

CONFIDENTIAL PROPRIETARY TRADE SECRET

CONFIDENTIAL ATTACHMENT
STAFF-DR-01-003(b)(1)

FILED UNDER SEAL


Harris Pike
The route along Harris Pike which was considered
Area of proposed route

Duke Energy Kentucky
Case No. 2026-00112
STAFF First Request for Information
Date Received: June 9, 2026

STAFF-DR-01-004

REQUEST:

Refer to the Application, page 7, paragraph 17. Explain which debt instruments Duke Kentucky proposes to use to finance the construction.

RESPONSE:

The Company proposes to finance the construction of the project through continuing operations and, if necessary, through debt issuances. The Company is not planning a discrete debt issuance specifically for this project but rather evaluates the capital structure of Duke Energy Kentucky as a whole. The Company regularly reviews and monitors its current capital structure to ensure it is financing capital expenditures and ongoing operations in accordance with its regulatory capital structure as approved in the Company’s last natural gas base rate case. Typically, the Company will fund capital expenditures through continuing operations and short-term debt until it is able to price a debt issuance of sufficient size (recently about $80-150 million unsecured private placement notes with a tenor range of 7 to 15 years per issuance).

PERSON RESPONSIBLE: Jefferson “Jay” P. Brown

Duke Energy Kentucky
Case No. 2026-00112
STAFF First Request for Information
Date Received: June 9, 2026

STAFF-DR-01-005

REQUEST:

Refer to Direct Testimony of David A. Klein. Explain how Duke Kentucky determined what diameter pipe to use for each segment of the proposed pipeline extension.

RESPONSE:

Duke Energy Kentucky uses Synergi Gas software to simulate the natural gas system to assess system pressures and determine appropriate pipe diameters for each segment. An 8” pipeline from AM03 to UL45 was determined to be adequate to relieve the pressure losses based on this modeling. Due to routing considerations, pipeline segments of 6” and 4” were determined to be necessary for constructability reasons.

PERSON RESPONSIBLE: Megan J. Riley

Duke Energy Kentucky
Case No. 2026-00112
STAFF First Request for Information
Date Received: June 9, 2026

STAFF-DR-01-006

REQUEST:

Refer to the Application, Exhibit 6, Direct Testimony of David A. Klein (Klein Direct Testimony), page 3, line 15, regarding the proposed 24-inch pipeline. Explain why a pipeline of this size is necessary, including any calculations.

RESPONSE:

The mention of a 24-inch pipeline was an inadvertent error. The proposed pipeline diameter size is 8-inches for the majority of pipeline length, with smaller segments of 6-inch and 4-inch diameter.

PERSON RESPONSIBLE: David A. Klein

Duke Energy Kentucky
Case No. 2026-00112
STAFF First Request for Information
Date Received: June 9, 2026

STAFF-DR-01-007

REQUEST:

Refer to Klein Direct Testimony, page 8, lines 17-18.

a. Explain how often the required periodic inspections and testing occur.

b. Provide the costs associated with the required periodic inspections and testing.

RESPONSE:

a. The leak survey for the proposed distribution line would occur at intervals to not exceed 3 years. The leak survey would include boots on the ground with a CGI to check for leaks.

b. The O&M costs associated with the required periodic leak survey inspections would be approximately $500/mile plus an estimated 5% annual increase.

PERSON RESPONSIBLE: David A. Klein

Duke Energy Kentucky
Case No. 2026-00112
STAFF First Request for Information
Date Received: June 9, 2026

CONFIDENTIAL STAFF-DR-01-008
(As to Attachment only)

REQUEST:

Refer to the Application, Exhibit 6, Klein Direct Testimony, page 10. Provide the breakdown of the Confidential Attachment DAK-1 with attention to the applicable Federal Energy Regulatory Commission (FERC) accounts in Excel spreadsheet format with all formulas, rows, and columns fully accessible and unprotected.

RESPONSE:

CONFIDENTIAL PROPRIETARY TRADE SECRET (As to Attachment only)

Please see STAFF-DR-01-008 Confidential Attachment. This information was included in Confidential Attachment DAK-1 as well; however, the columns were inadvertently hidden. All costs incurred are expected to be recorded to utility account 27602/FERC account 376 except for the line item labeled "Land – Permanent" which will be recorded to utility account 27400/FERC account 374.

PERSON RESPONSIBLE: Jefferson "Jay" P. Brown, as to FERC account
David A. Klein, as to confidential attachment

\

CONFIDENTIAL PROPRIETARY TRADE SECRET

CONFIDENTIAL ATTACHMENT
STAFF-DR-01-008

FILED UNDER SEAL