

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

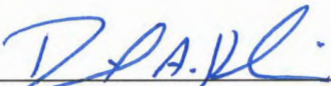
ELECTRONIC APPLICATION OF DUKE	)	
ENERGY KENTUCKY, INC. FOR A	)	
CERTIFICATE OF PUBLIC CONVENIENCE	)	
AND NECESSITY FOR TO CONSTRUCT	)	CASE NO.
GAS DISTRIBUTION LINES IN CAMPBELL,	)	2026-00114
PENDLETON, AND BRACKEN COUNTIES	)	
KENTUCKY AND OTHER GENERAL	)	
RELIEF	)	

RESPONSES TO COMMISSION’S STAFF’S
SECOND INFORMATION REQUEST TO DUKE ENERGY KENTUCKY, INC.
DATED JUNE 26, 2026

VERIFICATION

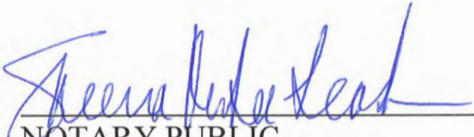
STATE OF OHIO)
) SS:
COUNTY OF HAMILTON)

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 13th day of July, 2026.



NOTARY PUBLIC

My Commission Expires:

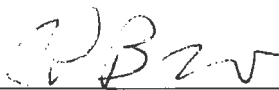


Sheena McGee Leach
Attorney at Law
Notary Public, State of Ohio
My Commission Has No Expiration Date
Sec 147.03 RC

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.



Jefferson "Jay" P. Brown, Affiant

Subscribed and sworn to before me by Jefferson "Jay" P. Brown on this 13th day of July, 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 NORTH CAROLINA)
) SS:
COUNTY OF MECKLENBURG)

The undersigned, Neil M. Moser, Vice President Gas Major Projects, being duly sworn, deposes and says that he has personal knowledge of the matters set forth in the foregoing data requests and that the answers contained therein are true and correct to the best of his knowledge, information, and belief.

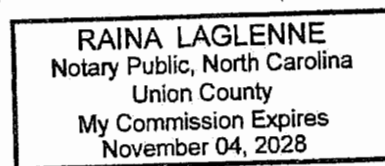


Neil M. Moser, Affiant

Subscribed and sworn to before me by Neil M. Moser on this 6th day of
July, 2026.


NOTARY PUBLIC

My Commission Expires:



VERIFICATION

STATE OF OHIO)
) SS:
COUNTY OF HAMILTON)

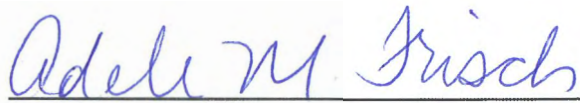
The undersigned, Jeff Schuchter, Manager Project Management, being duly sworn, deposes and says that he has personal knowledge of the matters set forth in the foregoing data requests, and that the answers contained therein are true and correct to the best of his knowledge, information, and belief.



Jeff Schuchter, Affiant

Subscribed and sworn to before me by Jeff Schuchter on this 14 day of July, 2026.





NOTARY PUBLIC

My Commission Expires: 1/5/2029

Duke Energy Kentucky
Case No. 2026-00114
STAFF Second Request for Information
Date Received: June 26, 2026

STAFF-DR-02-001

REQUEST:

Refer to the Application, the Direct Testimony of Jefferson Brown (Brown Direct Testimony), page 4. Provide the breakdown for the estimated minimal (<\$10,000 per year) incremental operational and maintenance expense (O&M).

RESPONSE:

A leak survey for the proposed distribution lines would occur at intervals to not exceed three years. The leak survey would include an in-person field inspection with a combustible gas indicator to check for leaks. 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
Jefferson “Jay” P. Brown

**Duke Energy Kentucky
Case No. 2026-00114
STAFF Second Request for Information
Date Received: June 26, 2026**

STAFF-DR-02-002

REQUEST:

Refer to Brown Direct Testimony, page 4, lines 18-20. Confirm if the estimated in-service date remains the same. If not confirmed, provide the revised Attachment_DAK_1.

RESPONSE:

The estimated in-service dates remain the same.

PERSON RESPONSIBLE: David A. Klein

**Duke Energy Kentucky
Case No. 2026-00114
STAFF Second Request for Information
Date Received: June 26, 2026**

STAFF-DR-02-003

REQUEST:

Refer to the Application, the Direct Testimony of David Klein (Klein Direct Testimony), page 5 and CONFIDENTIAL Attachment DAK-2. Provide a table showing the mileage of the pipelines, with a breakdown by pipeline size.

RESPONSE:

A detailed breakdown of the proposed pipeline diameters and associated lengths is provided in tabular form in Exhibits DAK-1 and DAK-2. Accordingly, please refer to those exhibits for the requested information.

PERSON RESPONSIBLE: David A. Klein

Duke Energy Kentucky
Case No. 2026-00114
STAFF Second Request for Information
Date Received: June 26, 2026

STAFF-DR-02-004

REQUEST:

Refer to the Application, the Direct Testimony of Neil M. Moser (Moser Direct Testimony), page 10. Explain if Duke Kentucky expects to have more customers in the same territory in the future.

RESPONSE:

The proposed gas main extensions pass existing potential customers who may convert to natural gas in the future as they replace or upgrade their appliances. In addition, the extensions are located in a rural area that may experience future development, creating opportunities for additional customer growth over time. While Duke Energy Kentucky cannot predict when such conversions or development may occur, nor the number of customers that may ultimately be added, the Company's experience demonstrates that the availability of natural gas infrastructure generally leads to customer growth over time in areas served by gas mains.

PERSON RESPONSIBLE: Neil M. Moser

Duke Energy Kentucky
Case No. 2026-00114
STAFF Second Request for Information
Date Received: June 26, 2026

STAFF-DR-02-005

REQUEST:

Refer to Moser Direct Testimony, page 4, refer also to Brown Direct Testimony, page 2, and refer to Case No. 2025-00142, Application, page 4 which states:

Duke Energy Kentucky also plans to file an application to approve the abandonment of these lines once Duke Energy Kentucky converts the customers to an alternate fuel source to avoid any uncertainty on whether Duke Energy Kentucky has an obligation to serve these customers. Duke Energy Kentucky believes converting these twenty-five (25) customers into an alternative fuel source and to connect the two (2) customers that are in close proximity to Duke Energy Kentucky's pipelines, is what is best for not only these twenty seven (27) customers, but also all of Duke Energy Kentucky customers. Based on Duke Energy Kentucky's due diligence, this alternative is the most economic for Duke Energy Kentucky, its customers, and the least impactful to the service provided for these Duke Energy Kentucky "farm tap" customers.

- a. Confirm if the certificate of public convenience and necessity (CPCN) filed in this case includes 27 customers or it is only for 25 customers.
- b. Explain what tariff classifications these 27 customers were assigned under KO Transmission (a subsidiary of Duke Energy Corporation) before KO was acquired by TC Energy in 2023.
- c. Provide any case numbers or applications, in any jurisdiction or with any regulatory agency, filed by Duke Energy and TC Energy related to the abandonment.

RESPONSE:

a. There are 27 customers currently served from TC Energy's transmission line. Duke Energy Kentucky has existing facilities in close proximity to two of these customers and intends to transfer those customers to its existing facilities. The remaining 25 customers are included in this CPCN request and will be served through the proposed facilities.

b. These customers are Duke Energy Kentucky customers, not KO Transmission customers.

c. Duke Energy Kentucky is not aware of any filings related to the abandonment.

PERSON RESPONSIBLE: Neil M. Moser

Duke Energy Kentucky
Case No. 2026-00114
STAFF Second Request for Information
Date Received: June 26, 2026

STAFF-DR-02-006

REQUEST:

Refer to the Application and the Direct Testimony of Brown, page 5, lines 1–2.

- a. Provide the total number of Duke Kentucky's natural gas customers in Kentucky.
- b. Provide the estimated impact of the project on customers' monthly bills.
- c. Based on the total project cost and the unique circumstances associated with this issue, explain whether Duke Kentucky considered alternative cost recovery approaches, such as amortizing and recovering the project costs over a ten-year period.

RESPONSE:

- a. Duke Energy Kentucky's natural gas customer classes include approximately 98,918 residential customers, 7,304 commercial customers, and 211 industrial customers.
- b. Please see STAFF-DR-02-006 Attachment.
- c. The Company has only considered the options presented in this proceeding, and in Case No. 2025-00142. Please note that accelerating the recovery period as implied in the question above as well as extending it would violate the cost matching principle.

PERSON RESPONSIBLE: Jefferson "Jay" P. Brown

**ATTACHMENT
A IS AN EXCEL
SPREADSHEET
AND UPLOADED
SEPARATELY**

**Duke Energy Kentucky
Case No. 2026-00114
STAFF Second Request for Information
Date Received: June 26, 2026**

**CONFIDENTIAL STAFF-DR-02-007
(As to Attachment only)**

REQUEST:

Refer to Duke Kentucky's responses to Commission Staff First Request for Information (Staff's First Request), item 2b. Provide the average monthly bill for the 27 affected customers. In addition, for each of the 27 affected customers, provide the estimated average monthly energy cost following conversion to the alternative fuel source expected to serve that customer. Compare those estimated monthly energy costs to the customers' current average monthly natural gas bills and identify the estimated monthly increase or decrease in monthly energy costs for each customer and on average.

RESPONSE:

CONFIDENTIAL PROPRIETARY TRADE SECRET (As to Attachment only)

Please see STAFF-DR-02-007 Confidential Attachment 1 provided herewith pursuant to a motion for confidential treatment for the 27 customers' average monthly bill.

For a typical home in Kentucky or Ohio, natural gas has the lowest operating cost and is most economical where service is available. A high-efficiency heat pump is similar in cost to natural gas and sometimes lower depending on electric rates. Propane is usually 40-90% higher in cost than natural gas, and electric resistance heat, like a baseboard/electric furnace, usually has the highest operating cost. Additionally, please see STAFF-DR-02-007 Attachment 2.

PERSON RESPONSIBLE: Jeff Schuchter

**ATTACHMENT
A IS AN EXCEL
SPREADSHEET
AND UPLOADED
SEPARATELY**

ATTACHMENT
FILED UNDER SEAL
PURSUANT TO A
MOTION FOR
CONFIDENTIAL
TREATMENT