

**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 FIRST INFORMATION REQUEST**

**TO DUKE ENERGY KENTUCKY, INC.**

**DATED MAY 29, 2026**

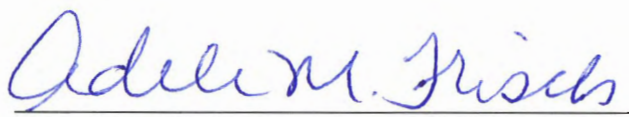
VERIFICATION

STATE OF OHIO                    )  
                                          )  
COUNTY OF HAMILTON        )        SS:

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 this 2<sup>ND</sup> day of June, 2026.

  
\_\_\_\_\_  
NOTARY PUBLIC



My Commission Expires: 1/5/2029

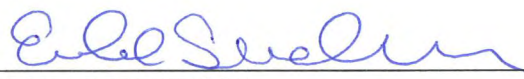
**VERIFICATION**

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 this 15<sup>th</sup> day of June, 2026.

  
\_\_\_\_\_  
NOTARY PUBLIC

My Commission Expires: July 8, 2027



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

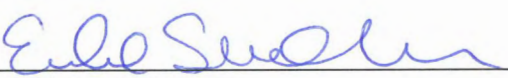
**VERIFICATION**

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

The undersigned, 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 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   3<sup>rd</sup>   day of June, 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. 2026-00114  
STAFF First Request for Information  
Date Received: May 29, 2026**

**CONFIDENTIAL STAFF-DR-01-001  
(As to Attachment only)**

**REQUEST:**

Refer to the Application, pages 2-3, paragraphs 3-6. Provide the following regarding the 27 affected customers:

- a. Customer class for each customer;
- b. Service address for each customer;
- c. Annual usage for each customer for the last three calendar years; and
- d. Whether any customer has declined continued natural gas service.

**RESPONSE:**

**CONFIDENTIAL PROPRIETARY TRADE SECRET (As to Attachment only)**

- a. Please see STAFF-DR-01-001 Confidential Attachment.
- b. Please see STAFF-DR-01-001 Confidential Attachment.
- c. Please see STAFF-DR-01-001 Confidential Attachment.
- d. None of the existing 27 customers have declined continued natural gas

service. Duke Energy Kentucky has not made offers to the 27 customers to select between any of the options listed in Declaratory Order Case No. 2025-00142 since the Case is still pending.

**PERSON RESPONSIBLE:** David A. Klein

**Duke Energy Kentucky**  
**Case No. 2026-00114**  
**STAFF First Request for Information**  
**Date Received: May 29, 2026**

**STAFF-DR-01-002**

**REQUEST:**

Refer to the Application, page 3, paragraph 5.

a. Provide all analyses, studies, workpapers, or evaluations comparing conversion of customers to alternative fuel sources versus extending Duke Kentucky's distribution mains to continue serving those customers.

b. State whether Duke Kentucky continues to believe conversion to alternative fuel sources is the least-cost alternative and, if not, identify all facts, analyses, or assumptions supporting any change in that position.

c. Identify all facts, assumptions, timeline changes, or operational considerations that caused Duke Kentucky to determine that it must now simultaneously pursue expedited approval for construction of distribution facilities while Case No. 2025-00142 remains pending.

**RESPONSE:**

a. Please see STAFF-DR-01-002(a) Attachment. When the application in Case No. 2025-00142<sup>1</sup> was compiled, Duke Energy Kentucky estimated an initial amount to compensate customers for an assumed average cost per conversion of \$25,000. The \$25,000 was an estimate intended to assist the Commission's evaluation of prudence. This figure represents an estimated cost of potential re-wiring/plumbing and equipment,

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<sup>1</sup> *In the Matter of the 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, Application (June 3, 2025).

including the replacement of any natural gas appliances. Duke Energy Kentucky understands that every customer's situation is unique and the cost to convert might be less or more than \$25,000 depending on the situation. The \$25,000 is an estimate that could be negotiated once a final order is received in this proceeding. The document provided is the only document that was created in support of the \$25,000 amount. The supporting information was derived through phone conversations with a propane supplier, plumber, and through online research, including home supply websites to provide a high-level estimate of costs to convert.

b. Yes, Duke Energy Kentucky believes that conversion to an alternative fuel source is the least-cost alternative. If converting to an alternative fuel source is not a viable solution for the Commission, the other reasonable alternative is to extend Duke Energy Kentucky's mains as soon as possible, before TC Energy completes its pipeline abandonment, in order to provide continuity of natural gas service to the affected customers.

c. On June 3, 2025, in Case No. 2025-00142, Duke Energy Kentucky filed an Application seeking a Declaratory Order from the Commission that recovery of the costs of converting these customers to an alternative fuel source was reasonable as the least cost-solution for addressing the abandonment of the natural gas transmission line by TC Energy. In addition, as that case progressed, Duke Energy Kentucky informed the Commission and the parties that the Company is not opposed to building infrastructure to serve the affected customers.

However, construction of new mains takes time. And as stated in that proceeding, since time was of the essence Duke Energy Kentucky requested the Commission determine

that the construction would be in the normal course of business and a CPCN would not be required for the infrastructure needed to serve these customers. To date, the Commission has not issued a decision in that proceeding and a year has passed. In the event the Commission finds that conversion to alternative fuel source is not recommended and the Company should act to extend its mains to continue natural gas service for the affected customers, the time for the Company to complete construction before TC Energy decommissions the pipeline serving these customers is running short, especially if a full CPCN is required.

Therefore, if the Commission issues an Order in Case No. 2025-00142 that Duke Energy Kentucky should extend service to these customers and that a CPCN is not required, Duke Energy Kentucky reserved the right to withdraw this Application. Similarly, if the Commission determines that the Company should assist these customers through a fuel conversion, then this application will be withdrawn. If, however, the Commission determines that the Company's gas mains should be extended, natural gas service should continue for the customers, and a CPCN is necessary, then this proceeding is the vehicle for that decision.

**PERSON RESPONSIBLE:** David A. Klein

### Estimated Cost to Convert to Propane

	Low End	Mid	High End	
Set Tank	\$ 120.00	\$ 310.00	\$ 500.00	Tank must be 10' min from structure
Install Regulators	\$ 200.00	\$ 600.00	\$ 1,000.00	2 @ \$100/each
Line Cost from Tank to House	\$ 800.00	\$ 2,400.00	\$ 4,000.00	\$5-8/ft
Initial Fill of Propane	\$ 1,020.00	\$ 1,110.00	\$ 1,200.00	Fill is 400 gallons @ \$2.55-3.00

### Appliance Conversion

Furnace	\$ 200.00	NA
Hot Water Heater	\$ 200.00	NA
Fireplace	\$ 200.00	NA
Stove	\$ 200.00	NA
Clothes Dryer	\$ 200.00	NA

### New Appliances

Furnace	NA	\$ 7,500.00	\$ 15,000.00
Hot Water Heater	NA	\$ 1,500.00	\$ 3,000.00
Fireplace	NA	\$ 1,000.00	\$ 2,000.00
Stove	NA	\$ 1,250.00	\$ 2,500.00
Clothes Dryer	NA	\$ 1,250.00	\$ 2,500.00
<b>Total Cost</b>	\$ 3,140.00	\$ 16,920.00	\$ 31,700.00

\*cost varies depending on location of tank, size, number of appliances, if appliances can be converted, installation costs

## Estimated Cost to Convert to Electric

	Low End	Mid	High End
Electric Service Work	\$ 2,000.00	\$ 3,000.00	\$ 4,000.00
Misc. Conversions Electrical work in Home	\$ 2,000.00	\$ 3,500.00	\$ 5,000.00
New Appliances			
Furnace	\$ 6,000.00	\$ 10,500.00	\$ 15,000.00
Hot Water Heater	\$ 1,500.00	\$ 2,250.00	\$ 3,000.00
Fireplace	\$ 1,000.00	\$ 1,500.00	\$ 2,000.00
Stove	\$ 1,500.00	\$ 2,250.00	\$ 3,000.00
Clothes Dryer	\$ 1,200.00	\$ 1,850.00	\$ 2,500.00
Total Cost	\$ 15,200.00	\$ 24,850.00	\$ 34,500.00

\*cost varies depending on extent of electrical work needed, size of home, number of appliances, installation costs

**Duke Energy Kentucky**  
**Case No. 2026-00114**  
**STAFF First Request for Information**  
**Date Received: May 29, 2026**

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

**REQUEST:**

Refer to the Application, pages 7-10, paragraphs 15-18.

- a. Provide a detailed breakdown of the estimated \$17.3 million project cost by project segment.
- b. Provide the estimated cost per customer for the proposed project.
- c. Provide the estimated mileage, pipe size, and estimated cost for each project segment.

**RESPONSE:**

**CONFIDENTIAL PROPRIETARY TRADE SECRET (As to Attachment only)**

- a. Please see STAFF-DR-01-003 Confidential Attachment.
- b. Please see STAFF-DR-01-003 Confidential Attachment, Excel line 34.
- c. Please see STAFF-DR-01-003 Confidential Attachment.

**PERSON RESPONSIBLE:** David A. Klein

**Duke Energy Kentucky**  
**Case No. 2026-00114**  
**STAFF First Request for Information**  
**Date Received: May 29, 2026**

**STAFF-DR-01-004**

**REQUEST:**

Refer to the Application, pages 10-11, paragraph 20, and Attachment DAK-1.

- a. Provide the current construction schedule for each project segment.
- b. State the anticipated in-service date for each segment.
- c. State the date by which TC Energy is expected to abandon service to each affected area.
- d. Identify any project segments or affected customers for which Duke Kentucky anticipates a risk of temporary interruption of natural gas service and explain the expected duration and cause of any such interruption.
- e. Identify all construction, permitting, procurement, contractor scheduling, or operational deadlines that Duke Kentucky contends would be impacted if a final Order is not issued by August 1, 2026.

**RESPONSE:**

- a. Please see Attachment DAK-1 and testimony submitted with the Company's Application in this proceeding on May 4, 2025.
- b. Please see Attachment DAK-1 and testimony submitted with the Company's Application in this proceeding on May 4, 2025. The Company expects in-service at the completion of construction of each segment.
- c. Please see Attachment DAK-1 and testimony submitted with the Company's Application in this proceeding on May 4, 2025. TC Energy is expected to

abandon the gas line feeding the Customers on Cabin Creek, Carthage, Gubser Mill Daniels, and Pendelton segments by April 2027. TC Energy is expected to abandon the gas line feeding the Customers on Poplar Ridge, Upper Tug Fork, and Gubser Mill Wagoner by November 2027.

d. The Company's proposed construction schedule and achieving service for customers without interruption is based upon receiving an order by August 1, 2026. If a final Order is not received by August 1, 2026, each day of delay the Company cannot commence or complete its construction could result in a temporary interruption of natural gas service by a corresponding day. While the Company will make every effort to avoid an interruption of service, it is likely that every day of delay in commencing construction will result in a day of gas service interruption for the customer as the Company will be unable to complete construction before TC Energy decommissions its pipeline.

e. Due to the urgency of the installation of the distribution mains, construction, permitting, procurement, contractor scheduling, and operational deadlines could all be impacted if a final Order is not received by August 1, 2026.

**PERSON RESPONSIBLE:** David A. Klein

**Duke Energy Kentucky**  
**Case No. 2026-00114**  
**STAFF First Request for Information**  
**Date Received: May 29, 2026**

**STAFF-DR-01-005**

**REQUEST:**

Refer to the Application, pages 7-10, paragraphs 16-19. Identify all specific facts relied upon by Duke Kentucky in concluding the proposed construction will not result in wasteful duplication, materially affect Duke Kentucky's financial condition, or immediately increase rates.

**RESPONSE:**

The proposed construction will not result in wasteful duplication because Duke Energy Kentucky does not have distribution mains in place today to serve the customers that will be affected by TC Energy's abandonment of its line. If Duke Energy Kentucky does not build, the customers will not have natural gas. The costs to serve these customers are capital expenses and would be included in rate base in the next base rate case after the project is placed in-service.

**PERSON RESPONSIBLE:** Neil M. Moser

**REQUEST:**

Refer to the Application, page 9-10, paragraph 18(c)-(d).

- a. Provide all analyses relied upon to conclude the project will not materially affect Duke Kentucky's financial condition.
- b. Explain whether Duke Kentucky anticipates seeking recovery of project costs in a future base rate proceeding.
- c. Explain whether the project is expected to increase rates for existing customers.

**RESPONSE:**

- a. Duke Energy Kentucky reviewed the current long-range plan and determined that it is capable of adjusting its capital plan so as not to materially impact its financial condition. Duke Energy Kentucky did not perform a written or formal analysis to conclude the project will not materially affect the Company's financial condition.
- b. Duke Energy Kentucky anticipates seeking recovery of project costs in a future bas rate proceeding. The costs to serve these customers are capital expenses and would be included in rate base in the next base rate case assuming the project is placed in-service.
- c. The project would not have an immediate impact on rates for existing customers, but the Company would seek recovery in a future base rate case.

**PERSON RESPONSIBLE:** Jefferson "Jay" P. Brown

**Duke Energy Kentucky**  
**Case No. 2026-00114**  
**STAFF First Request for Information**  
**Date Received: May 29, 2026**

**STAFF-DR-01-007**

**REQUEST:**

Refer to the Application, page 3, paragraphs 5-6, page 9, paragraph 18(c), and page 14, paragraph 27.

a. Identify all alternatives considered by Duke Kentucky to continue service to the affected customers.

b. For each alternative identified in response to Item 7(a), explain all economic, operational, timing, reliability, customer-service, or feasibility considerations that caused Duke Kentucky not to select that alternative.

c. Confirm whether Duke Kentucky evaluated propane conversion, electric conversion, or other distributed alternatives on a customer-by-customer basis. If unable to confirm, explain Duke Kentucky's evaluation procedure.

d. Provide all analyses, studies, workpapers, or evaluations supporting Duke Kentucky's conclusion that the proposed construction is the "least cost, most reasonable alternative."

**RESPONSE:**

a. Duke Energy Kentucky does not have natural gas available directly adjacent to the 27 Customers who are currently fed from TC Energy natural gas lines. Therefore, the only available alternative to converting these customers to an alternative fuel source (e.g., electric, propane, etc.) would be for Duke Energy Kentucky to extend the closest existing natural gas mains to these customers.

b. Please see response to (a) above.

c. Duke Energy Kentucky did not perform such an analysis, as Declaratory Case No. 2025-00142 is still pending and no option has been approved. In filing Case No. 2025-00142, the Company was agnostic to fuel sources and willing to work with the affected customers on selecting the fuel of their choice (*e.g.*, electric, propane, etc.). The Company did not want to choose for the customer or limit them.

d. Duke Energy Kentucky believes that converting to an alternative fuel source is the least-cost alternative solution. If converting to an alternative fuel sources is not a viable solution for the Commission, the other reasonable alternative is to extend Duke Energy Kentucky's mains as soon as possible, before TC Energy completes its pipeline abandonment. Construction of the new natural gas mains as proposed is the least-cost, most reasonable alternative that allows these customers to continue with natural gas service secondary to converting these customers to an alternative fuel source. Exhibit 4 to the Company's Application includes the proposed route, construction specs, maps, etc., that support the chosen route is the least cost solution to extend its natural gas mains for Duke Energy Kentucky to continue supplying natural gas service to these affected customers.

**PERSON RESPONSIBLE:** Neil M. Moser

**STAFF-DR-01-008**

**REQUEST:**

Refer to the Application, page 6, paragraph 11, and Exhibit 3.

- a. Provide the current status of all permits required for the proposed project.
- b. Identify any permits or approvals that could delay construction.
- c. State whether any stream crossings, wetland impacts, or environmental impacts are anticipated.

**RESPONSE:**

- a. There is no change in permit status.
- b. The Company is not aware of, nor does it anticipate, any permitting delays at this time. However, all permits could delay construction if not approved by the proper authorities.
- c. A crossing of a twelve mile creek is shown on the design drawings as an HDD crossing. No wetlands will be impacted. Crossing numerous ephemeral channels and intermittent streams via open cut installation is anticipated. Channel and stream impacts will be minimal as work would be completed within the same day. There will be minimal tree clearing, only as needed within road ROW, mostly impacting scrub/shrub.

**PERSON RESPONSIBLE:** David A. Klein

**Duke Energy Kentucky**  
**Case No. 2026-00114**  
**STAFF First Request for Information**  
**Date Received: May 29, 2026**

**STAFF-DR-01-009**

**REQUEST:**

Refer to Confidential Exhibit 4 and the Direct Testimony of David Klein.

- a. Provide the expected useful life of the proposed facilities.
- b. Identify any alternative routing, pipe sizing, or design options evaluated for the proposed project.
- c. Identify all routing, constructability, environmental, right-of-way, operational, customer-service, and cost considerations evaluated in selecting the proposed routing and design.

**RESPONSE:**

- a. Based on the most recent depreciation study, the average service line for a plastic natural gas main is 70 years with an approved depreciation rate of 1.69 percent, and the average service life for a plastic natural gas service is 50 years with an approved depreciation rate of 2.77 percent.
- b. Proposed routes were selected to mainly follow the existing road ROW from the closest existing natural gas mains. Minor private easements were included in the design. The existing farm tap locations are generally remote with limited options to be served from the existing natural gas system, for this reason, no other combination of pipe sizes or routing alternatives were considered.
- c. Please see the response to (b) above.

**PERSON RESPONSIBLE:** Jefferson “Jay” P. Brown – a.  
David A. Klein – b., c.

**Duke Energy Kentucky  
Case No. 2026-00114  
STAFF First Request for Information  
Date Received: May 29, 2026**

**CONFIDENTIAL STAFF-DR-01-010  
(As to Attachment only)**

**REQUEST:**

Provide all communications between Duke Kentucky and TC Energy regarding abandonment timing, customer impacts, continuation of customer service, and coordination of construction activities.

**RESPONSE:**

**CONFIDENTIAL PROPRIETARY TRADE SECRET (As to Attachment only)**

Please see STAFF-DR-01-010 Confidential Attachment.

**PERSON RESPONSIBLE:** Jeff Schuchter

**Duke Energy Kentucky**  
**Case No. 2026-00114**  
**STAFF First Request for Information**  
**Date Received: May 29, 2026**

**STAFF-DR-01-011**

**REQUEST:**

Refer to the Application, page 10, paragraph 20, and page 14, paragraph 27. Reconcile Duke Kentucky’s statements that alternative fuel conversion is the “least cost alternative” with its statement that the proposed construction is the “least cost, most reasonable alternative,” including identification of all non-cost considerations incorporated into Duke Kentucky’s evaluation.

**RESPONSE:**

The CPCN is the least cost solution to continue *natural gas service*, but conversion to an alternate fuel source (e.g., propane, electric, etc.), other than natural gas, would be a less expensive overall solution for all other customers. While Duke Energy Kentucky believes that converting the affected customers to an alternative fuel source remains the least-cost solution to mitigate the impact of TC Energy abandoning its pipeline, if converting to an alternative fuel source is not a viable solution for the Commission, the other reasonable alternative is to extend Duke Energy Kentucky’s mains to continue natural gas service for these affected customers as soon as possible, before TC Energy completes its pipeline abandonment. The Company’s proposal in this Application is the least cost solution that maintains natural gas service for the affected customers.

**PERSON RESPONSIBLE:** Neil M. Moser