

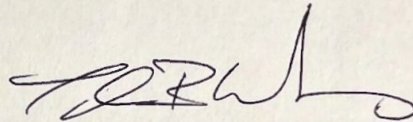
KyPSC Case No. 2026-00144
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VERIFICATION

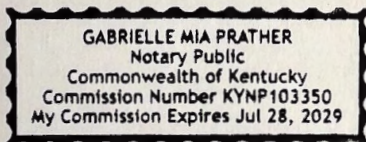
STATE OF ~~OHIO~~ ^{Kentucky})
COUNTY OF ~~HAMILTON~~ ^{Boone}) SS:

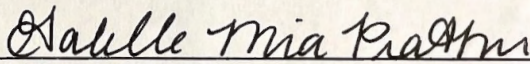
The undersigned, Tyler B. Morris, Gas Regulatory Compliance Analyst II, being duly sworn, deposes and says he has personal knowledge of the matters set forth in the foregoing data requests, and that the information contained therein is true and correct to the best of his knowledge, information, and belief.



Tyler B. Morris, Affiant

Subscribed and sworn to before me by Tyler B. Morris on this 22ND day of July, 2026.




NOTARY PUBLIC

My Commission Expires: 07/28/29

STATE OF OHIO

SS:

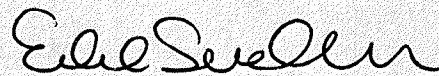
COUNTY OF HAMILTON

The undersigned, Nicholas J. Schack, Manager, Gas Customer Field Operations, 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.



Nicholas J. Schack, Affiant

Subscribed and sworn to before me by Nicholas J. Schack on this 24 day of July, 2026.



NOTARY PUBLIC

My Commission Expires: July 8, 2027

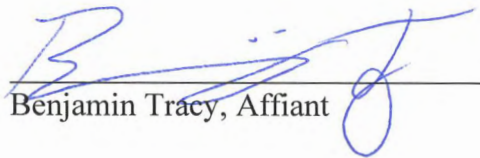


EMILIE SUNDERMAN
Notary Public
State of Ohio
My Comm. Expires
July 8, 2027

VERIFICATION

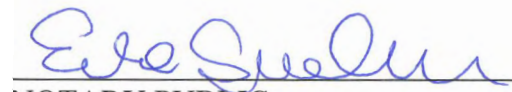
STATE OF OHIO)
) SS:
COUNTY OF HAMILTON)

The undersigned, Benjamin Tracy, Engineer III, 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.



Benjamin Tracy, Affiant

Subscribed and sworn to before me by Benjamin Tracy on this 21 day of July, 2026.



NOTARY PUBLIC

My Commission Expires: July 8, 2027

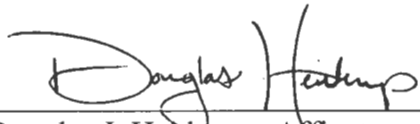


EMILIE SUNDERMAN
Notary Public
State of Ohio
My Comm. Expires
July 8, 2027

VERIFICATION

STATE OF OHIO)
) SS:
COUNTY OF HAMILTON)

The undersigned, Douglas J. Heitkamp, Manager Rates and Regulatory Strategy, 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.



Douglas J. Heitkamp, Affiant

Subscribed and sworn to before me by Douglas J. Heitkamp on this 22nd 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

Duke Energy Kentucky
Case No. 2026-00144
STAFF First Request for Information
Date Received: July 9, 2026

STAFF-DR-01-001

REQUEST:

Refer to the Application, generally. Provide the study or the analysis that resulted in filing this case.

RESPONSE:

There was not a specific study or quantitative analysis that resulted in the filing of this Application. The filing of the Application was driven by internal discussion and recognition of (1) the current reality that all Category 1 and Category 2¹ tested meters are replaced after testing, causing their effective life to be limited to either fifteen years or five years, respectively; (2) the availability of the option to seek approval of a scientific sample meter test plan (SSMT Plan) under 807 KAR 5:022, Section 3(4)(c); (3) the review of other natural gas utilities' previously approved applications for SSMT Plans; and (4) available industry standards and technical expertise. Duke Energy's purpose in filing an application to adopt a scientific sample meter test plan (SSMT Plan) is to implement a meter testing program that provides confidence that its positive displacement diaphragm gas meters operating in Kentucky accurately measure the natural gas usage of its customers, while extending the lifespan of the meters in operation.

¹ As in the Application, positive displacement meters with a rated capacity up to and including 500 cubic feet per hour (CFH) are referred to as Category 1 meters and positive displacement meters with a rated capacity above 500 CFH, up to and including 1,500 CFH are referred to as Category 2 meters. *See* Application, pp. 2-3.

Duke Energy's proposed SSMT Plan is designed to provide a high level of meter measurement accuracy for gas delivered to our customers while reducing costs associated with meter replacements for testing required by 807 KAR 5:022 Section 3, Subsection (4)(c). This high level of accuracy will be achieved by applying modern statistical meter sampling techniques that have been developed and based on widely recognized quality control standards for testing in-service gas meters taken from ANSI/ASQ Z1.4.

PERSON RESPONSIBLE: Tyler B. Morris

STAFF-DR-01-002

REQUEST:

Refer to the Application, page 4, where Duke Energy Kentucky states that “the costs to refurbish, repair, store, and redeploy a once-used diaphragm meter were determined to exceed the costs of simply purchasing a new meter” Explain the extent to which the costs to refurbish and redeploy a once-used diaphragm meter exceed the costs of purchasing a new Category 1 or 2 meter.

RESPONSE:

Duke Energy Kentucky does not currently refurbish, repair, store, and redeploy once-used diaphragm meters. Based on current practices and available cost information, the Company has determined that refurbishment and redeployment is not a cost-effective alternative to replacement with a new meter.

A new residential Category 1 diaphragm meter (250 CFH) costs approximately \$128. By comparison, it is estimated that refurbishing a used 250 CFH diaphragm meter would require approximately two labor hours. This estimate was provided by a senior Gas Metering and Communications (GMC) technician. Using a loaded labor rate of approximately \$70 per hour, the labor cost alone to rebuild a meter is approximately \$140, which exceeds the purchase cost of a new meter.

In addition to the direct labor required for disassembly, inspection, cleaning, reassembly, and testing, additional time would be required to source and procure replacement components. The availability of parts for older diaphragm meter models may

be limited or uncertain, potentially increasing both cost and processing time. Further costs associated with inventory management, storage, quality control, testing, and redeployment would also be incurred before a refurbished meter could be returned to service.

Accordingly, the Company believes that purchasing and installing a new meter is a more efficient and cost-effective approach than refurbishing and redeploying a once-used diaphragm meter. This approach aligns with the Company's current operating practices and supports the safe and reliable provision of service to customers.

PERSON RESPONSIBLE: Nicholas J. Schack

STAFF-DR-01-003

REQUEST:

Refer to the Application, pages 4-5, paragraph 8, which states that the proposed plan will generate “capital savings and improving efficiency.”

- a. Provide the specific annual capital savings Duke Kentucky expects to achieve over each of the six years of the proposed plan.
- b. Provide a detailed cost-benefit analysis comparing the status quo testing requirements against the proposed scientific sample plan.

RESPONSE:

a. Duke Energy Kentucky anticipates that implementation of the proposed Scientific Sample Meter Test (SSMT) Plan will generate capital savings by reducing the number of Category 1 and 2 meters that would otherwise be removed and replaced solely to satisfy periodic testing requirements. Under the proposed sampling methodology, qualifying meter populations may remain in service based on demonstrated performance, thereby reducing the quantity of meter replacements required each year.

The total projected annual capital savings associated with the proposed SSMT plan are shown below:

Year	Projected Capital Savings
2027	\$1,184,444
2028	\$1,299,796
2029	\$1,199,021
2030	\$2,240,531

Year	Projected Capital Savings
2031	\$1,000,562
2032	\$1,398,198

These estimates are expressed in 2026 dollars and do not account for future inflation, escalation in material costs, labor costs, or other market factors. Actual savings realized in future years may differ from the estimates presented above.

The projections are based on current meter population assumptions and estimated replacement costs. Specifically, the estimate assumes that approximately 5 percent of affected Category 1 meters are 425 CFH meters with an estimated unit cost of approximately \$317, while approximately 95 percent of affected Category 1 meters are 250 CFH meters with an estimated unit cost of approximately \$128.

In addition, the projected savings assume the annual meter replacement quantities identified under the existing program are completed within the year scheduled and are not rolled over into subsequent years. The estimated savings therefore reflect the difference between the current replacement approach and the proposed sampling methodology based on the projected annual meter counts available at the time of this filing.

b. Please see STAFF-DR-01-003 Attachment.

PERSON RESPONSIBLE: Nicholas J. Schack

Ky Age Change Current Program projected meter change

CAT I	CAT II	Total	250	425	1000	Total Spend Current Program	250=\$128
2027	6274	293	\$ 763,008.00	\$ 99,221.00	\$ 414,888.00	\$ 1,277,117.00	425=\$317
2028	6805	343	\$ 827,520.00	\$ 107,780.00	\$ 485,688.00	\$ 1,420,988.00	1000=\$1416
2029	8591	110	\$ 1,044,736.00	\$ 135,993.00	\$ 155,760.00	\$ 1,336,489.00	
2030	15111	236	\$ 1,837,568.00	\$ 239,335.00	\$ 334,176.00	\$ 2,411,079.00	
2031	6070	293	\$ 738,176.00	\$ 96,051.00	\$ 414,888.00	\$ 1,249,115.00	
2032	7845	343	\$ 953,984.00	\$ 124,264.00	\$ 485,688.00	\$ 1,563,936.00	

Ky Age Change Proposed Sample Program projected meter change

CAT I	CAT II	Total
2027	1010	100
2028	1240	87
2029	1328	159
2030	1690	116
2031	2231	164
2032	1620	130

Sequence	Sampling Year	400A	AC-250	AL-175	AL-425	MET250	Total
1	2027	19	359	4	63	565	1010
2	2028	85	273	0	42	840	1240
3	2029	7	314	2	45	960	1328
4	2030	57	418	0	77	1138	1690
5	2031	76	336	0	81	1738	2231
6	2032	52	368	0	62	1138	1620

Sequence	Sampling Year	1000A	AC 1000	AL-1000	AL-800	SL 1000	Total
1	2027	62	6	15	0	17	100
2	2028	45	4	24	1	13	87
3	2029	110	5	31	0	13	159
4	2030	71	3	35	0	7	116
5	2031	120	7	29	0	8	164
6	2032	90	5	29	0	6	130

250	425	Total CAT I
\$ 72,683.00	\$ 19,990.00	\$ 92,673.00
\$ 107,793.00	\$ 13,399.00	\$ 121,192.00
\$ 123,196.00	\$ 14,272.00	\$ 137,468.00
\$ 146,082.00	\$ 24,466.00	\$ 170,548.00
\$ 222,800.00	\$ 25,753.00	\$ 248,553.00
\$ 146,032.00	\$ 19,706.00	\$ 165,738.00

1000	Total Spend Per Year Sample Program
\$ 141,600.00	\$ 234,273.00
\$ 123,192.00	\$ 244,384.00
\$ 225,144.00	\$ 362,612.00
\$ 164,256.00	\$ 334,804.00
\$ 232,224.00	\$ 480,777.00
\$ 184,080.00	\$ 349,818.00

Total Savings per Year CAT 1 and 2

2027	\$ 1,184,444.00
2028	\$ 1,299,796.00
2029	\$ 1,199,021.00
2030	\$ 2,240,531.00
2031	\$ 1,000,562.00
2032	\$ 1,398,198.00

Duke Energy Kentucky
Case No. 2026-00144
STAFF First Request for Information
Date Received: July 9, 2026

STAFF-DR-01-004

REQUEST:

Refer to the Application, page 4, paragraph 8, which states Duke Kentucky will “replace significantly fewer Category 1 and 2 Meters each year.” Provide the projected number of meters that will be replaced annually under the proposed plan versus the number of meters replaced under the current 15-year and 5-year replacement cycles.

RESPONSE:

Under Duke Energy Kentucky's current meter testing and replacement practices, Category 1 and Category 2 meters that reach their required testing interval are removed from service and replaced. The proposed Scientific Sample Meter Test Plan (SSMT Plan) would significantly reduce the number of meters requiring replacement by allowing statistically representative samples to be tested and evaluated rather than replacing all meters that reach the current testing threshold.

The table below compares the projected annual meter replacement quantities under the current program and the proposed SSMT Plan:

Year	Current Program Projected Meter Changes (Cat I & Cat II)	Proposed SSMT Program Projected Meter Changes (Cat I & Cat II)
2027	6,567	1,110
2028	7,148	1,327
2029	8,701	1,487
2030	15,347	1,806
2031	6,363	2,395
2032	8,188	1,750

As shown above, the proposed Sample Plan is projected to substantially reduce the number of Category 1 and Category 2-meter replacements required each year when compared to the Company's current replacement methodology. The reduction in meter replacements is expected to generate capital savings while continuing to maintain confidence in meter accuracy using statistically valid sampling and testing methods.

These projections are based on internal forecasting models used by the Company to evaluate future meter sourcing and inventory requirements. The forecasts utilize current meter population data, projected testing schedules, and anticipated replacement volumes. Actual replacement quantities may differ from those projected due to changes in meter populations, meter performance results, regulatory requirements, operational priorities, or other factors outside the Company's control.

PERSON RESPONSIBLE: Nicholas J. Schack

STAFF-DR-01-005

REQUEST:

Refer to the Application, page 4, paragraphs 7 and 8. Explain how Duke Kentucky will avoid accelerated depreciation on the sampled Category 1 and 2 Meters if they are tested before the end of their useful lives.

RESPONSE:

Duke Energy's proposed SSMT Plan is expected to reduce testing frequency and thereby extend effective meter lifecycle, while maintaining confidence that Duke's meters remain accurate. The SSMT Plan would lengthen the life span of Category 1 and 2 meters by reducing the need to replace meters that are part of an SSMT control group that passed sample testing.

Currently Duke Energy replaces Category 1 (500 CFH or less) meters every 15 years and Category 2 (above 500 CFH up to and including 1500 CFH) meters every 5 years, regardless of the remaining useful life of the meters. The cost of refurbishing, repairing, storing, and redeploying once-used diaphragm meters is not a cost-effective alternative to replacing meters removed from service with new meters.

Meters selected from a control group to be sample tested will continue to be replaced with new meters. The sample tested meters would be removed from service and have their depreciation accelerated as they are depreciated fully. The remaining meters within a control group will remain in service as long as the sampled meters pass testing within an Acceptable Quality Level (AQL – Refer to Application, Exhibit 2, page 3). These

meters will not have accelerated depreciation. The number of meters within a control group that will remain in service after passing sample testing will be significant. In a control group with a minimum of 100 meters, it is expected that at least 80% of meters will remain in service after passing sample testing every 5 years for Category 1 and annually following 15 years in service.

PERSON RESPONSIBLE: Tyler B. Morris

STAFF-DR-01-006

REQUEST:

Refer to the Application, page 5, paragraph 9. Explain what Duke Kentucky expects to experience after gathering five full years of the proposed Scientific Sample Meter Test (SSMT) Plan. Further, explain why a shorter amount of time would not give Duke Kentucky enough data to determine whether to continue the proposed SSMT Plan.

RESPONSE:

It is Duke Energy Kentucky's assessment that five years will provide sufficient time to gather and analyze data from the implementation of the SSMT Plan and propose modifications before any subsequent filing. The five years would give the Company enough time to sample test 33% of all Category 1 meter control groups and 100% of all Category 2 meter control groups. Since meter control groups are based on meter model and year of interest, having data on a larger proportion of control groups will make it more likely that any anomalies or trends are encountered and identified. Based on the data obtained during the first five years of the proposed SSMT Plan, the Company will make a future filing for extension of the approved meter test plan and/or approval of any proposed modifications.

PERSON RESPONSIBLE: Tyler B. Morris

STAFF-DR-01-007

REQUEST:

Refer to the Application, generally. Refer also to the Application, Exhibit 2, page 2.

a. Provide Duke Kentucky's historical gas meter test results for the past ten years, broken down by:

(1) Manufacturer and model.

(2) Meter age at the time of the test.

b. Provide the historical percentage of meters tested that exhibited over-registration (fast) and under-registration (slow) beyond the regulatory +/- 2 percent threshold over the past ten years.

RESPONSE:

a. Please see STAFF-DR-01-007 Attachments 1 through 33. These Excel spreadsheets contain meter test results for the past ten years. The "Meter ID – Manufacturer" column contains a unique meter ID, which contains characters identifying the manufacturer. For example, Meter ID's containing "IT" indicate the meter was manufactured by Itron. The column titled "Meter Size/Type" identifies the model for that manufacturer. STAFF-DR-01-007 Attachments 1 to 33 do not contain the meter age. Duke Energy Kentucky has records of the age of meters which are currently installed but may not have records of the age of meters which have been retired.

A column with the names of the operators of each test has been removed.

b. A table providing the historical percentage of meters testing outside the regulatory +/- 2 percent threshold, by year (rounded to the nearest 1%):

2026	1%
2025	0%
2024	0%
2023	4%
2022	5%
2021	3%
2020	5%
2019	4%
2018	6%
2017	10%
2016	2%

PERSON RESPONSIBLE: Nicholas J. Schack

EXCEL FILES

STAFF-DR-01-007 ATTACHMENTS 1-33

UPLOADED ELECTRONICALLY ONLY

DUE TO SIZE

STAFF-DR-01-008

REQUEST:

Refer to the Application, Exhibit 2, page 3, which establishes an Acceptable Quality Level (AQL) of 6.5. Provide engineering and statistical justification for selecting an AQL of 6.5 rather than a stricter consumer-protection threshold (e.g., an AQL of 1.0, 2.5, or 4.0).

RESPONSE:

An AQL of 6.5 is considered sufficient when evaluating for minor defects. For purposes of the proposed SSMT Plan, Duke Energy Kentucky considers a deviation to meter accuracy to be a minor defect because it does not present a physical risk to the public or to infrastructure. These meters are tested for accuracy before they enter service and under the proposed SSMT Plan the control groups will be regularly sampled for continued accuracy, allowing for deficiencies in meter accuracy to be identified and removed before more significant deviation occurs. Therefore, it is Duke Energy Kentucky's position that an AQL of 6.5 is appropriate.

[REMAINDER OF PAGE INTENTIONALLY LEFT BLANK]

The Commission has previously approved the use of an AQL of 6.5 for other natural gas scientific sample meter test plan pilots for other utilities, including but not limited to Louisville Gas and Electric Company¹ and Columbia Gas.²

PERSON RESPONSIBLE: Benjamin Tracy

¹ *In the Matter of the Application of Louisville Gas and Electric Company for Approval of a Statistical Meter Sampling Plan for Residential Gas Meters Pursuant to 807 KAR 5:022, Section 8(5)(C) of the Commission's Regulations*, Case No. 94-046, Order, p. 1 (Aug. 23, 1995) (“[T]he Commission finds that LG&E’s revised plan should be accepted for a pilot period of 5 years.”); *id.*, Appendix, pp. 1-2 (discussing AQL of 6.5 in the approved plan). The Commission approved this utility to permanently implement its statistical meter sampling plan, with certain modifications, in its November 7, 2001, Order in Case No. 2000-00278. Based on a review of sample sizes and accept/reject levels in a relatively recent post-case filing, it appears that this utility continued using an AQL of 6.5 in the permanent program. See https://psc.ky.gov/PSCSCF/Post%20Case%20Referenced%20Correspondence/2000%20cases/2000-00278/20190329_LGE%20Gas%20Meter%20Performance%20Control%20Plan%20and%20Residential%20Gas%20Regulator%20Performance%20Control%20Program.pdf (last accessed July 22, 2026).

² *In the Matter of the Application of Columbia Gas of Kentucky, Inc. for Approval of a Statistical Sample Meter Test Plan for Residential, Industrial and Commercial Class Meters Pursuant to 807 KAR 5:022, Section 8(5)(C)*, Case No. 96-010, Order, p. 2 (May 14, 1996) (approving pilot for 5 years); *id.*, Appendix, pp. 1-2 (discussing use of AQL of 6.5). The Commission approved this utility to permanently implement its plan in its February 26, 2001, Order in Case No. 2000-00429. Based on a review of sample sizes and accept/reject levels in a relatively recent post-case filing, it appears that this utility continued using an AQL of 6.5 in the permanent program. See https://psc.ky.gov/PSCSCF/Post%20Case%20Referenced%20Correspondence/2000%20cases/2000-00429/20250331_Columbia%20Gas%20of%20Kentucky,%20Inc.%20Annual%20Statistical%20Meter%20Testing%20Plan.pdf (last accessed July 22, 2026).

Duke Energy Kentucky
Case No. 2026-00144
STAFF First Request for Information
Date Received: July 9, 2026

STAFF-DR-01-009

REQUEST:

Refer to the Application, Exhibit 2. Explain why the American National Standards Institute (ANSI) Z1.4 standard was chosen for this plan. Include in this explanation if this methodology has been utilized by other utilities in other jurisdictions.

RESPONSE:

ANSI Z1.4 is a nationally accepted standard that covers sampling procedures for inspection by attributes (i.e., pass or fail criteria). It is maintained by the American Standard for Quality Subcommittee on the Application of Statistical Methods and is the industry accepted specification for a single sample plan, at a normal inspection level.

Columbia Gas¹ and Louisville Gas & Electric² both used the predecessor of ANSI Z1.4, MIL-STD-105 for their previously approved meter sampling programs. MIL-STD-105 was retired in 2008 and that material is now covered by ANSI Z1.4.

PERSON RESPONSIBLE: Benjamin Tracy

¹ *In the Matter of the Application of Columbia Gas of Kentucky, Inc. for Approval of a Statistical Sample Meter Test Plan for Residential, Industrial and Commercial Class Meters Pursuant to 807 KAR 5:022, Section 8(5)(C)*, Case No. 96-010, Order, p. 1 (May 14, 1996) (“The plan, attached as an Appendix to this Order, is based on Military Standard 105D, Sampling Procedures and Tables for Inspection by Attributes. . .”).

² *In the Matter of the Application of Louisville Gas and Electric Company for Approval of a Statistical Meter Sampling Plan for Residential Gas Meters Pursuant to 807 KAR 5:022, Section 8(5)(C) of the Commission’s Regulations*, Case No. 94-046, Order, p. 1 (August 23, 1995) (“[T]he Commission finds that LG&E’s revised plan should be accepted for a pilot period of 5 years.”); *id.* (“The revised plan, described as an Appendix to this Order, is based upon Military Standard 105D, Sampling Procedures and Tables for Inspection by Attributes. . .”).

**Duke Energy Kentucky
Case No. 2026-00144
STAFF First Request for Information
Date Received: July 9, 2026**

STAFF-DR-01-010

REQUEST:

Refer to the Application, Exhibit 2, page 3. Provide the mathematical calculations, confidence intervals, and consumer risk profiles associated with the Single Sampling Plan for Normal Inspection detailed in Table 1.

RESPONSE:

Table 1 of the Application, Exhibit 2, page 3 is abstraction from Table I and Table II-A of ANSI Z1.4, on pages 10 and 11. Table I is used to determine the sample size required for a control group of a Single Sampling Plan at General Inspection Level II. Table II-A is used to determine the accept and reject quantities at an AQL of 6.5. In general, an AQL of 6.5 represents a maximum process average of 6.5% failure rate amongst the entire population of accepted control groups. The values tabulated are nationally accepted values.

PERSON RESPONSIBLE: Benjamin Tracy

Duke Energy Kentucky
Case No. 2026-00144
STAFF First Request for Information
Date Received: July 9, 2026

STAFF-DR-01-011

REQUEST:

Refer to the Application, exhibit 2, page 4, which proposes a 35-year maximum end-of-life duration for meters up to 500 CFH. Provide all engineering studies, manufacturer specifications, or historical performance data to support a diaphragm meter in service for up to 35 years.

RESPONSE:

The basis for a 35-year maximum end-of-life duration for meters up to 500 CFH was initially derived from precedent of similar natural gas utilities within Kentucky who have previously applied for and adopted a Scientific Sample Meter Test Plan.¹

In Duke Energy's proposed SSMT Plan it is stated, "Meter control groups up to 500 CFH will be sample-tested in their 5th, 10th, and 15th years following their instest date, after which they will be sample-tested annually." Annual meter sample testing for meter control groups in service beyond 15 years accompanied by leak surveys, atmospheric corrosion inspections, cathodic protection inspections, and regular maintenance will

¹ See *In the Matter of the Application of Louisville Gas and Electric Company for Approval of a Statistical Meter Sampling Plan for Residential Gas Meters Pursuant to 807 KAR 5:022, Section 8(5)(C) of the Commission's Regulations*, Case No. 94-046, Order, p. 2 (Aug. 23, 1995) ("No meter in this class will remain in service for more than 35 years,"); It is also the Company's understanding that Columbia Gas of Kentucky, Inc. (Columbia Gas) uses a 35-year life for residential meters, as its most recent annual report for 2024 includes meters installed as early as 1989. See, e.g., https://psc.ky.gov/PSCSCF/Post%20Case%20Referenced%20Correspondence/2000%20cases/2000-00429/20250331_Columbia%20Gas%20of%20Kentucky,%20Inc.%20Annual%20Statistical%20Meter%20Testing%20Plan.pdf, Exhibit D, pg. 2 (last accessed July 24, 2026).

provide additional safety assurances to get the maximum useful life out of these types of meters decreasing the financial burden of replacing meters when not necessary.

PERSON RESPONSIBLE: Tyler B. Morris

**Duke Energy Kentucky
Case No. 2026-00144
STAFF First Request for Information
Date Received: July 9, 2026**

STAFF-DR-01-012

REQUEST:

Refer to the Application, generally. Explain the impact of the proposed plan on the average customer bill.

RESPONSE:

There would be no immediate impact of the proposed plan on the average customer bill until the Company's next base rate case. Using the projected annual capital savings as provided in the Company's response to STAFF-DR-01-003, please see STAFF-DR-01-012 Attachment for an estimated impact on the average customer bill. The monthly bill impact amounts shown in attachment represent the estimated bill reduction for the customer.

PERSON RESPONSIBLE: Douglas J. Heitkamp

Duke Energy Kentucky
Case No. 2026-00144

Estimated Impact of the proposed plan on the average customer bill

Per Bill Impact	2027		2028		2029		2030		2031		2032	
Class	Annual Savings	Monthly Bill Impact	Annual Savings	Monthly Bill Impact	Annual Savings	Monthly Bill Impact	Annual Savings	Monthly Bill Impact	Annual Savings	Monthly Bill Impact	Annual Savings	Monthly Bill Impact
RS	\$61,731	\$0.04	\$129,472	\$0.09	\$191,963	\$0.14	\$308,734	\$0.22	\$360,880	\$0.26	\$433,751.08	\$0.31
GS	\$22,824	\$0.24	\$47,871	\$0.49	\$70,977	\$0.73	\$114,152	\$1.18	\$133,432	\$1.38	\$160,375.64	\$1.66
FT-L	\$3,901	\$2.07	\$8,183	\$4.33	\$12,132	\$6.42	\$19,512	\$10.33	\$22,808	\$12.07	\$27,413.42	\$14.51
IT - Inter. Transportation	\$508	\$2.23	\$1,065	\$4.67	\$1,579	\$6.93	\$2,539	\$11.14	\$2,968	\$13.02	\$3,566.74	\$15.64
TOTAL	\$88,964		\$186,591		\$276,650		\$444,936		\$520,088		\$625,106.88	

Inputs for Calculation

Projected Capital Savings

Year	Amount
2027	\$1,184,444
2028	\$1,299,796
2029	\$1,199,021
2030	\$2,240,531
2031	\$1,000,562
2032	\$1,398,198
TOTAL	\$8,322,552

Source: Projected Capital Savings, STAFF-DR-01-003

Weighted Cost of Capital 7.511%

Source: Approved Weighted Average Cost of Capital in last natural gas base rate case. Case No. 2025-00125. Order, page 19, December 23, 2025

Meter Cost Allocator Ratio (K413)

Class	Ratio
RS	69.388%
GS	25.656%
FT-L	4.385%
IT - Inter. Transportation	0.571%
TOTAL	100.000%

Source: Meter allocation from Cost of Service Study WP-FR-16-(7)(v) - VIII in Case No. 2025-00125.

Customer Bills (July 2025-June 2026)

Class	Annual Amount
RS	1,379,632
GS	96,837
FT-L	1,889
IT - Inter. Transportation	228
TOTAL	1,478,586

Source: Company Records

Utility_Name	DUKE ENERGY KENTUCKY									
Service Type	(Multiple Items)									
Metric_Subcategory	Rate Schedule	Rate Schedule Description	Year	Billed Contracts						
FULL SERVICE			2025	1,430			RS	1,379,632	114,969.33	
			2026	1,385			GS	96,837	8,069.75	
	KYGC_GS	KY - GAS GENERAL SERVICE	2025	47,761			FT-L	1,889	157.42	
			2026	49,060	96,837		IT	228	19.00	
	KYGC_GSGL	KY - GAS GENERAL SERVICE (GAS LIGHT)	2025	8				1,478,586	123,215.50	
			2026	8						
	KYGC_GSNM	KYGC-GAS GENERAL SERVICE UNMETERED	2025	108						
			2026	108						
	KYGR_RS	KY - GAS RESIDENTIAL SERVICE	2025	687,376						
			2026	692,256	1,379,632					
	KYGT_IT	KY - GAS TRANSPORTATION INTERPTBLE SERV	2025	-						
			2026	-						
MISC REVENUE	OHGR_RS	OH - GAS RESIDENTIAL SERVICE	2025	-						
			2026	-						
COMPANY USE			2025	-						
			2026	-						
TRANSPORTATION ONLY	KYGC_GS	KY - GAS GENERAL SERVICE	2025	72						
			2026	84						
	KYGR_RS	KY - GAS RESIDENTIAL SERVICE	2025	9						
			2026	3						
			2025	-						
			2026	-						
	KYGC_GS	KY - GAS GENERAL SERVICE	2025	-						
			2026	1						
	KYGR_RS	KY - GAS RESIDENTIAL SERVICE	2026	-	FT-L	IT	IT BILLS			
	KYGT_IT	KY - GAS TRANSPORTATION INTERPTBLE SERV	2025	1,048	2,117		19	228		
Grand Total			2026	1,069	1,889					
				1,481,786						

**Duke Energy Kentucky
Case No. 2026-00144
STAFF First Request for Information
Date Received: July 9, 2026**

STAFF-DR-01-013

REQUEST:

Refer to the Application, Exhibit 2, page 3. Explain in further detail how the random sample of the meter control groups will be selected.

RESPONSE:

Control groups will be identified by three criteria: model, manufacturer, and date of instest. Within each control group to be tested, Duke plans to use a random number generator to determine which service ID's within each control group will be selected to make up the test sample.

PERSON RESPONSIBLE: Benjamin Tracy

**Duke Energy Kentucky
Case No. 2026-00144
STAFF First Request for Information
Date Received: July 9, 2026**

STAFF-DR-01-014

REQUEST:

Provide quantifiable cost savings associated with the proposed SSMT plan as opposed to alternative methods as it pertains to Duke Kentucky's ratepayers.

RESPONSE:

Please see the Company's response to STAFF-DR-01-003 for the estimated capital cost savings relative to the Company's current practice. The Company did not consider refurbishment as a viable alternative for the reasons described in its response to STAFF-DR-01-002.

PERSON RESPONSIBLE: Nicholas J. Schack

Duke Energy Kentucky
Case No. 2026-00144
STAFF First Request for Information
Date Received: July 9, 2026

STAFF-DR-01-015

REQUEST:

Provide information regarding the applicability of the SSMT method to federal and state safety requirements.

RESPONSE:

Duke Energy's SSMT Plan directly applies to and is in compliance with Kentucky Administrative Regulations:

807 KAR 5:022 – Section 3.

807 KAR 5:022 – Section 3., Subsection (4)(c)

807 KAR 5:022 – Section 8.

807 KAR 5:006 – Section 17., Subsection (1)

Duke Energy Kentucky conducts two additional required inspections any time a meter is installed, inspected, tested, removed, or replaced during normal operations and maintenance activities, including during the execution of the Company's current meter testing program. The two additional inspections conducted by the Company are Regulator Inspections and Curb Box/Valve Inspections. These inspections are required to be conducted "at intervals not to exceed the periodic meter test intervals," pursuant to 807 KAR 5:006, Section 26(5)(b) and (c):

(b) At intervals not to exceed the periodic meter test intervals, individual residential customer service regulators, vents, and relief valve vents shall be checked for operable condition.

(c) At intervals not to exceed the periodic meter test intervals, the curb box and valve on the service line shall be inspected for operable condition.

Duke Energy is proposing to continue to conduct Regulator Inspections and Curb Box/Valve Inspections on those meters which are sampled pursuant to the proposed scientific sample meter testing plan (SSMT Plan) in the same manner as the Company currently conducts both inspections in conjunction with meter testing required by 807 KAR 5:022 – Section 3. Meters which are not included in the samples tested pursuant to the proposed SSMT Plan, *i.e.*, the remainder of each control group would no longer receive Regulator Inspections and Curb Box/Valve Inspections on a meter-testing schedule. However, their regulators, curb boxes, and valves would still be inspected under the other programs described below.

Duke Energy performs inspections on all curb boxes and valves annually through its Gas Service Curb Box and Curb Valve Accessibility Program. The Curb Box/Valve Accessibility Program ensures:

- Service information maintained in records is correct (house number, street spelling, curb line measurements, and intersecting street measurements).
- The curb box is accessible, the box has a lid and is in good condition, the valve can be seen, and a valve key can be placed on the valve to operate.
- If maintenance is required on the curb box or curb valve a work order is generated and all necessary maintenance is performed by a qualified NGBU employee or contractor.

While these inspections do not typically include operation of the valve, they are otherwise substantially similar to the Curb Box/Valve Inspections required by 807 KAR

5:006, Section 26(5)(c).

With regard to Regulator Inspections, Duke Energy Kentucky performs such inspections whenever an existing customer's natural gas service is reconnected after disconnection for any reason or whenever a new service is connected for a customer. Duke Energy also conducts additional inspections of all service regulators during routine maintenance, as follows: whenever field and contractor personnel are in the proximity of a meter and regulator installation, a routine inspection of meter, regulating equipment and gas service piping on a customer's premise is conducted. During these routine inspections regulators are inspected for:

- Ease of accessibility to the meter and regulator.
- Exposure to potential damage from equipment, vehicles, corrosive environments, or other harmful activities that might be conducted on the premise.
- Regulator relief vent clearances from building features.
- Regulator support from piping.
- Size and load requirements.
- Leak testing to ensure no leaks are found on connections or through the vent.
- Vent is free and clear of obstructions, has a screen to prevent butts or other debris from entering, and facing downward to prevent water from collecting inside.

In addition to the regulator and curb box/valve inspections, Duke Energy Kentucky also conducts additional pipeline safety inspections that include meters, regulators, and

curb valves, apart from meter testing required by 807 KAR 5:022 – Section 3., and if the proposed SSMT is approved, the Company will continue to perform these additional inspections to ensure safe pipeline operations and compliance with both State and Federal pipeline safety requirements. Those pipeline safety inspections include:

- Leak Survey,
- Inside Pipe Inspections,
- House Line Inspections,
- Meter Dial Tests, and Customer Piping Integrity Testing,
- Atmospheric Corrosion Inspections,
- Service Inspections (Cathodic Protection reads and Potential measurements),
- Odorization Checks and Odorometer Testing,
- Line Patrol and Surveillance.

Duke Energy's SSMT Plan complies with all inspections prescribed or recommended by the Department of Transportation, 49 C.F.R. Part 192 Transportation of Natural and Other Gas by Pipeline: Minimum Federal Safety Standards, for the various classes of facilities.

PERSON RESPONSIBLE: Tyler B. Morris