

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF DUKE ENERGY)	
KENTUCKY, INC., FOR DEVIATION FROM)	CASE NO.
ALLIATE PRICING REQUIREMENTS AND TO)	2016-00312
AMEND EXISTING SERVICE AGREEMENTS TO)	
INCLUDE PEIDMONT NATURAL GAS COMPANY)	
AS PARTY)	

COMMISSION STAFF'S INITIAL REQUEST FOR INFORMATION TO
DUKE ENERGY KENTUCKY, INC.

Duke Energy Kentucky, Inc. ("Duke Kentucky"), pursuant to 807 KAR 5:001, is to file with the Commission the original and six copies in paper medium and an electronic version of the following information. The information requested herein is due on or before January 26, 2017. Responses to requests for information in paper medium shall be appropriately bound, tabbed and indexed. Each response shall include the name of the witness responsible for responding to the questions related to the information provided.

Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

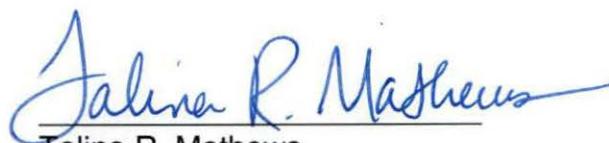
Duke Kentucky shall make timely amendments to any prior response if it obtains information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which Duke Kentucky fails or refuses to furnish all or part of the requested information, it shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention should be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, Duke Kentucky shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to the Application, paragraph 9. Duke Kentucky references its ability to pool resources and share natural gas stores/parts inventories with its parent, Duke Energy Ohio (“Duke Ohio”). Provide the annual dollar amount of natural gas stores/parts inventory transfers, by category (e.g., pipe, fittings, meters, and regulators¹) from Duke Ohio to Duke Kentucky and from Duke Kentucky to Duke Ohio for the years 2012 through 2016.

¹ Case No. 2008-00122, *Application of Duke Energy Kentucky, Inc. for Deviation from Affiliate Pricing Requirements and Approval of an Intercompany Asset Transfer Agreement*, Duke Kentucky’s response to First Data Request of Commission Staff, Item 1.b.

2. Explain in detail why the Intercompany Asset Transfer Agreement should not be amended to include, in Article 4, a section expressly stating that no electric assets or gas assets owned or controlled by Duke Kentucky and having an original book value of \$1,000,000 or more shall be acquired or transferred without the approval of the Kentucky Public Service Commission, unless the assets are obsolete or will not continue to be used to provide the same or similar service to Duke Kentucky or its customers.



Talina R. Mathews
Executive Director
Public Service Commission
P.O. Box 615
Frankfort, KY 40602

DATED JAN 19 2017

cc: Parties of Record

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