

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 TO )	CASE NO.
CONSTRUCT GAS DISTRIBUTION LINES IN )	2026-00114
CAMPBELL, PENDLETON, AND BRACKEN )	
COUNTIES, KENTUCKY, AND OTHER GENERAL )	
RELIEF )	

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

Duke Energy Kentucky, Inc. (Duke Kentucky), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due on June 16, 2026. The Commission directs Duke Kentucky to the Commission's July 22, 2021 Order in Case No. 2020-00085<sup>1</sup> regarding filings with the Commission. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the question to which the response is made and 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 the

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<sup>1</sup> Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC July 22, 2021), Order (in which the Commission ordered that for case filings made on and after March 16, 2020, filers are NOT required to file the original physical copies of the filings required by 807 KAR 5:001, Section 8).

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 amendment to any prior response if Duke Kentucky obtains information that indicates the response was incorrect or incomplete when made or, though correct or complete when made, is now incorrect or incomplete in any material respect.

For any request to which Duke Kentucky fails or refuses to furnish all or part of the requested information, Duke Kentucky shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied and scanned 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, 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.
- 2. Refer to the Application, page 3, paragraph 5.
    - a. Provide all analyses, studies, workpapers, or evaluations comparing conversion of customers to alternative fuel sources verses 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.
- 3. 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.
- 4. 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.
5. 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.
6. 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.
7. 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."

8. 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.

9. 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.

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

11. 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.



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Linda C. Bridwell, PE  
Executive Director  
Public Service Commission  
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DATED   **MAY 29 2026**  

cc: Parties of Record

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