

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF KENTUCKY POWER)	
COMPANY FOR: (1) AN ORDER DECLARING)	CASE NO.
AND CLARIFYING THE APPLICATION OF THE)	2014 -00479
INSPECTION REQUIREMENTS OF 807 KAR)	
5:006, SECTION 26(4), TO CERTAIN OF THE)	
COMPANY'S TRANSMISSION FACILITIES; OR)	
(2) IN THE ALTERNATIVE, AND TO THE)	
EXTENT REQUIRED, A DEVIATION IN PART)	
FROM THE INSPECTION REQUIREMENTS OF)	
807 KAR 5:006, SECTION 26(4), WITH)	
RESPECT TO THE COMPANY'S)	
TRANSMISSION FACILITIES; AND (3) ALL)	
OTHER REQUIRED APPROVALS AND RELIEF)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO KENTUCKY POWER COMPANY

Kentucky Power Company ("Kentucky Power"), pursuant to 807 KAR 5:001, is to file with the Commission the original and ten copies of the following information, with a copy to all parties of record. The information requested herein is due 14 days from the date of this request. Responses to requests for information 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 the 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.

Kentucky Power shall make timely amendment 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 Kentucky Power 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 filing a paper containing personal information, Kentucky Power shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. State the factors that Kentucky Power believes are relevant in classifying its 34.5-kV lines as transmission facilities.

2. Are the 34.5-kV electric facilities inspected on the same schedule as facilities operating at or above 69 kV? If not, explain in detail the inspection schedule and types of inspections performed on the 34.5-kV facilities.

3. State the factors that Kentucky Power believes are relevant in classifying its 46-kV lines as transmission facilities.

4. Are the 46-kV electric facilities inspected on the same schedule as facilities operating at or above 69 kV? If not, explain in detail the inspection schedule and types of inspections performed on the 46-kV facilities.

5. Are the construction standards utilized for the approximate ten miles of 34.5-kV electric facilities the same as those utilized for electric facilities operating at or above 69 kV? Identify in the response any difference in construction standards.

6. Are the construction standards utilized for the 166 miles of 46-kV electric facilities the same as those utilized for electric facilities operating at or above 69 kV? Identify in the response any difference in construction standards.

7. State the vegetation management plan and practices for the approximate ten miles of 34.5-kV electric facilities. Identify in the response any vegetation management practice for these facilities that differs from vegetation management practices for transmission facilities operating at or above 69 kV. Provide all documentation supporting the response.

8. State the vegetation management plan and practices for the 166 miles of 46-kV electric facilities. Identify in the response any vegetation management practice for these facilities that differs from vegetation management practices for transmission facilities operating at or above 69 kV. Provide all documentation supporting the response.

9. Are there any points of service or other electric service arrangements that directly utilize electricity for the 34.5-kV or 46-kV electric facilities? If so, identify each point of service or other electric service arrangement.

10. Refer to the record in Case No. 2006-00494.¹ At page 3 of the Direct Testimony and Exhibits of Everett G. Phillips, filed with the Commission on April 13, 2007, Mr. Phillips states the following: “Our transmission system includes 1,235 miles of transmission lines in Kentucky with voltages ranging up to 765 kV. Our distribution system includes more than 9,636 miles of lower voltage lines on 205,915 company owned poles.” Answer the following questions.

a. What portion of the 166 miles of 46-kV electric facilities were included as part of the 1,235 miles of transmission lines in Kentucky identified in Mr. Phillips’ testimony in Case No. 2006-00494?

b. What portion of the 166 miles of 46-kV electric facilities were included as part of the more than 9,636 miles of lower-voltage lines?

c. What portion of the approximate ten miles of 34.5-kV electric facilities were included as part of the 1,235 miles of transmission lines in Kentucky identified in Mr. Phillips’ testimony in Case No. 2006-00494?

d. What portion of the approximate ten miles of 34.5-kV electric facilities were included as part of the more than 9,636 miles of lower-voltage lines?

11. Refer to the record in PSC Case No. 2006-00494.² At page 4 of the Direct Testimony and Exhibits of Everett G. Phillips, Mr. Phillips discusses ongoing “Distribution Asset Management Programs” and “Transmission Asset Management Programs.” Answer the following questions.

¹ Case No. 2006-00494, *An Investigation of the Reliability Measures of Kentucky’s Jurisdictional Electric Distribution Utilities and Certain Reliability Maintenance Practices* (Ky. PSC Oct. 26, 2007).

² *Id.*

a. What portion of the 166 miles of 46-kV electric facilities are included as part of a Distribution Asset Management Program? Provide all documentation supporting the response.

b. What portion of the 166 miles of 46-kV electric facilities are included as part of a Transmission Asset Management Program? Provide all documentation supporting the response.

c. What portion of the approximate ten miles of 34.5-kV electric facilities are included as part of a Distribution Asset Management Program? Provide all documentation supporting the response.

d. What portion of the approximate ten miles of 34.5-kV electric facilities are included as part of a Transmission Asset Management Program? Provide all documentation supporting the response.

12. Identify the portion of the 166 miles of 46-kV pole miles that Kentucky Power includes in determining any allocation factors relating to maintenance of transmission right-of-way.

13. Identify the portion of the approximate ten miles of 34.5-kV pole miles that Kentucky Power includes in determining any allocation factors relating to maintenance of transmission right of way.

14. Indicate the functional class of property ("transmission" or "distribution") that Kentucky Power utilizes for recording the 166 miles of 46-kV electric facilities as property, plant, and equipment. Provide in the response the account number(s) in Kentucky Power's Chart of Accounts for these electric facilities.

15. Indicate the functional class of property (“transmission” or “distribution”) that Kentucky Power uses for recording the approximate ten miles of 34.5-kV electric facilities as property, plant, and equipment. Provide in the response the account number(s) in Kentucky Power’s Chart of Accounts for these electric facilities.

16. Identify the depreciation practices for the 166 miles of 46-kV electric facilities. Provide in the response the deprecation rate(s) for the facilities.

17. Identify the depreciation practices for the approximate ten miles of 34.5-kV electric facilities. Provide in the response the depreciation rate(s) for the facilities.

18. Refer to the record in PSC Case No. 2006-00494.³ At page 14 of the Direct Testimony and Exhibits of Everett G. Phillips, filed with the Commission on April 13, 2007, Mr. Phillips describes Kentucky Power’s “Transmission Vegetation Management Program” and makes the following statement: “KPCo performs aerial vegetation patrols of its entire transmission system once a year to assist in developing a vegetation management work plan. In addition, vegetation maintenance on transmission lines is performed on an ongoing basis, depending upon the rate of growth of the vegetation and the voltage of specific transmission lines rather than on a rigid cycle basis, which would schedule circuits for maintenance, based upon the time elapsed since the last maintenance work was performed.” Answer the following questions.

a. Identify the vegetation maintenance schedule Kentucky Power would utilize for the 166 miles of 46-kV electric facilities if the Commission were to grant Kentucky Power’s request for a deviation. Provide in the response an explanation of

³ *Id.*

whether Kentucky Power plans to synchronize its inspection of these facilities with its vegetation maintenance patrols.

b. Identify the vegetation maintenance schedule Kentucky Power would utilize for the approximate ten miles of 34.5-kV electric facilities if the Commission were to grant Kentucky Power's request for a deviation. Provide in the response an explanation of whether Kentucky Power plans to synchronize its inspection of these facilities with its vegetation maintenance patrols.

c. Does Kentucky Power plan to utilize a "rigid cycle basis" for inspecting its 46-kV or 34.5-kV electric facilities if the Commission were to grant Kentucky Power's request for a deviation? If so, explain why. If not, identify and explain the inspection plan.

19. Refer to the record in Case No. 2006-00494.⁴ At pages 14 and 15 of the Direct Testimony and Exhibits of Everett G. Phillips, filed with the Commission on April 13, 2007, Mr. Phillips discusses reliability. Has a Regional Reliability Council determined that all or any portions of the 46-kV or 34.5-kV electric facilities are "critical transmission lines of lower voltage," as that phrase is used in Mr. Phillips' testimony? Provide all documentation in support of the response.



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cc: Parties of Record

⁴ *Id.*

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