

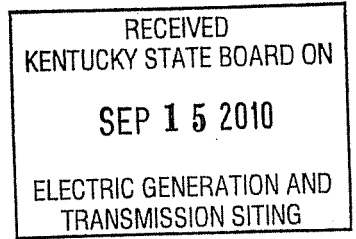
COMMONWEALTH OF KENTUCKY

BEFORE THE KENTUCKY STATE BOARD ON
ELECTRIC GENERATION AND TRANSMISSION SITING

In the Matter of:

APPLICATION OF SOUTHERN INDIANA)
GAS & ELECTRIC CO., D/B/A VECTREN)
ENERGY DELIVERY OF INDIANA, INC.)
FOR A CONSTRUCTION CERTIFICATE TO)
CONSTRUCT AN ELECTRIC TRANSMISSION)
LINE FROM ITS A.B. BROWN PLANT TO THE)
BIG RIVERS EHV STATION)

CASE NO.
2010-00223



HENDERSON WATER UTILITY'S
SECOND MOTION TO COMPEL

Comes the Intervenor, Henderson Water Utility (hereinafter referred to as the "HWU"), by counsel, and for it's Second Motion to Compel additional and complete information from the Applicant concerning previous information requests, states as follows:

1. HWU has previously filed a Motion to Compel in this matter;
2. That the Applicant provided to HWU a copy of a structural design drawing late on Monday afternoon, September 13, 2010;
3. That HWU has reviewed those designs, but those drawings do not contain the information which will allow HWU to evaluate, specifically, the location and impact the proposed structures will have upon the property owned by HWU which is within the transmission route proposed in this Application;

A. Specifically, HWU needs to know the exact location of each structure which is proposed to be placed upon its property and which of the 8 different types of structures identified in the structural detail are proposed to be placed upon its property;

B. How will those structures be anchored;

C. What will be the size and composition of the base of the structures;

D. What are the design and foundation specifications for each structure; and

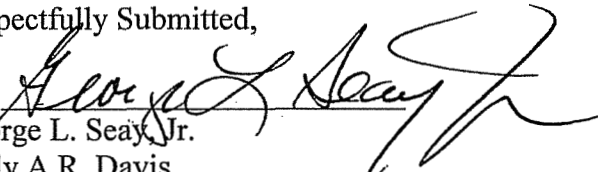
E. If these items have not been reduced to drawings at this time, what are the typical design criteria relating to each structure.

4. It is absolutely necessary that HWU have this information so that it may evaluate completely and fully the impacts which the proposed structures will have upon its property and its ability to utilize that property in its expansion program which has been previously described here.

WHEREFORE, the Intervenor, Henderson Water Utility, moves the Kentucky Siting Board to require that the Applicant immediately supply the information which has been requested in order that it may properly prepare for the formal hearing in this matter currently scheduled for October 13, 2010. Upon receipt HWU requests that it be granted a reasonable time to review comment and supplement its prior responses to data and information requests filed in this matter.

So Moved this the 15th day of September, 2010.

Respectfully Submitted,

By: 
George L. Seay, Jr.
Lesly A.R. Davis

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CERTIFICATE OF SERVICE

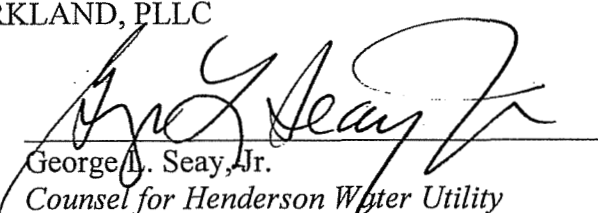
This is to certify that the original and ten true and correct copies of the foregoing has been served upon the following, by hand delivery, at the filing office of the Kentucky Public Service Commission, on this the 15th day of September, 2010:

Hon. Richard W. Bertelson, III
Counsel
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211 Sower Blvd
P.O. Box 615
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Mr. Jeff Derouen
Executive Director
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and via U.S. Mail, postage prepaid to:

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