

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

JOINT APPLICATION OF LOUISVILLE)
GAS AND ELECTRIC COMPANY AND)
KENTUCKY UTILITIES COMPANY)
FOR A CERTIFICATE OF PUBLIC) CASE NO. 2004-00507
CONVENIENCE AND NECESSITY, AND)
A SITE COMPATIBILITY CERTIFICATE,)
FOR THE EXPANSION OF THE TRIMBLE)
COUNTY GENERATING STATION)

COMMISSION STAFF'S SUPPLEMENTAL DATA REQUEST
TO LOUISVILLE GAS AND ELECTRIC COMPANY
AND KENTUCKY UTILITIES COMPANY

Pursuant to 807 KAR 5:001, Commission Staff requests that Louisville Gas and Electric Company ("LG&E") and Kentucky Utilities Company ("KU") file the original and 5 copies of the following information with the Commission on or before April 22, 2005, with a copy to all parties of record. Each copy of the information requested should be placed in a bound volume with each item tabbed. When a number of sheets are required for an item, each sheet should be appropriately indexed, for example, Item 1(a), Sheet 2 of 6. Include with each response the name of the witness who will be responsible for responding to questions relating to the information provided. Careful attention should be given to copied material to ensure its legibility. 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.

1. Identify the other permits that LG&E and KU are seeking in order to construct Trimble County #2 (e.g., air, NPDES), indicate the status of each permitting process, and provide copies of the permit applications.
2. Provide a map of the subject property corresponding to the Appendix A Legal Description.
3. Provide citations, documents, or underlying studies performed or gathered to complete the traffic analysis (Section 6.0 of the Site Assessment Report).
4. If Section 3.0, Scenic Compatibility, was based on a separately documented visual impact study, provide a complete copy of that study.
5. Provide the original data sets on property sales and assessed values used in the Property Value Assessment (Section 4.0), prior to any adjustments (a) for inflation or (b) to exclude the value of structures or improvements on the properties.
6. If Section 5.0, Noise Assessment, was based on a separately documented study, provide a complete copy of that study.
7. Supplement the map showing the location of facility buildings and other structures by adding the existing or proposed transmission lines.
8. Supplement the description of utility service to the site (Section 2.6) as follows:
 - a. Provide more information on how contractors are expected to provide water and wastewater service during construction.
 - b. Indicate the source of potable water after plant operations commence.

c. Indicate the source of natural gas for the site after plant operations commence.

d. Indicate the source of electricity, for plant use, after plant operations commence.

9. Will access control and security at the site need to be increased during construction to handle the large volume of temporary workers and materials shipments? If yes, indicate how the current access controls will be modified to accommodate these demands.

10. Provide a schedule indicating the projected construction workforce, by month, during project construction.

11. Name the communities or general locations where you anticipate that most of the workers will reside during construction.

12. From where will most of the coal used at the plant be shipped?

13. From where will most of the limestone used at the plant be shipped?

14. Will the major power plant components to be shipped in, mostly by barge, come from outside Kentucky?

15. Provide the highway capacities for Highway 754 and Highway 625.

16. Section 6.2.1 indicates that “deliveries for this equipment type (heavy haul equipment) could generate an additional three to five barges during the peak (construction) delivery period.” Clarify whether this means three to five barges per hour, day, week, or month.

17. Clarify the size of the project site. Section 3.0, refers to the site containing 650 acres. Appendix A and other documents indicate the site contains over 2,100 acres.

18. State whether any siting issues arose during the construction or operation of Trimble County Unit #1 and how those issues were resolved.

19. Describe any complaints received from local or state entities related to Trimble County Unit #1. Are you aware of any current concerns about visual, noise, traffic, or property value effects?

20. What is the distance between the closest boundary of the site and the nearest home in Wises Landing? How many homes are located in Wises Landing?

21. Is there any relationship between the plant, or the plant's owners, and the community of Wises Landing? (E.g., is Wises Landing a "company town"?)

a. Do the homes in Wises Landing generally pre-date development of Trimble County Unit #1?

b. Provide a map showing the location of residences around the plant site, excluding Wises Landing.

22. Provide the amounts of state and local taxes your facility paid for calendar year 2004. Distinguish between local property taxes paid to Trimble County and local property taxes paid to the school district and other taxing authorities.

23. Provide detailed information from your Trimble County Station partners -- Indiana Municipal Power Agency and Illinois Municipal Electric Agency -- regarding the amount of state and local taxes they paid based upon their ownership of Trimble County facilities and generation in 2004.

24. Provide the documents and data which John L. Carman and Associates, Inc. provided to Black & Veatch for use in developing the Siting Assessment Report.

25. Provide a paper copy and electronic file copy of the color map entitled "Trimble County – PSI Interconnection 345 KV Line."

26. Provide a copy of the visitor information pamphlet entitled "Trimble County Generating Station LG&E Energy."



Beth O'Donnell
Executive Director
Public Service Commission
P. O. Box 615
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DATED: April 15, 2005

cc: Parties of Record