

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF KENTUCKY UTILITIES)	
COMPANY CONCERNING THE NEED TO OBTAIN)	
CERTIFICATES OF PUBLIC CONVENIENCE AND)	CASE NO.
NECESSITY FOR THE CONSTRUCTION OF)	2009-00325
TEMPORARY TRANSMISSION FACILITIES IN)	
HARDIN COUNTY, KENTUCKY)	

COMMISSION STAFF'S FIRST DATA REQUEST

Pursuant to 807 KAR 5:001, Kentucky Utilities Company ("KU") is to file with the Commission the original and seven copies of the following information, with a copy to all parties of record. The information requested herein is due on or before October 30, 2009. 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 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.

KU 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

KU fails or refuses to furnish all or part of the requested information, KU 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.

1. Assume the temporary work-arounds are constructed and are removed within the initial three-year easement term.

a. Does KU anticipate having a significant amount of salvageable material resulting from the removal of the temporary line?

b. If KU anticipates salvageable material, explain the types of material KU would expect to salvage, the quantities KU would expect to salvage, and KU's best estimate as to the value of the salvaged material.

2. Explain whether the physical characteristics of the temporary work-around line would make the line more vulnerable to wind and ice loading than the existing portion of the permanent line. Include in the explanation a comparison of the load characteristics of the temporary facilities and the permanent line.

3. Provide an estimate of the proximity of the nearest residential structure to the temporary line. Include in the explanation whether the structure is located upon the property of those landowners agreeable to the temporary line.

4. Refer to page 7 of the pre-filed Direct Testimony of Edwin R. Staton. Mr. Staton testified that “KU chose the shortest and most direct routes that would avoid the contested properties without traversing buildings or trees,” and that KU then retained PhotoScience, Inc. to assess the suitability of the proposed temporary routes. Explain whether PhotoScience, Inc.’s assessment confirmed that the proposed temporary routes were the shortest and most direct routes with minimal impact on buildings and trees.

5. The MC-HC 345 kV circuit with the three temporary by-passes will be a longer circuit than the 42.03-mile circuit approved in Case No. 2005-00467.¹

a. What would be the total length of the MC-HC circuit with the three temporary bypasses?

b. List and describe any electrical or other technical characteristics of the MC-HC circuit with temporary bypasses that would differ from the approved MC-HC circuit.

c. List and provide any analyses that support the company’s conclusion about the existence or lack of such differences.

d. List and explain any impacts that the MC-HC circuit with temporary bypasses would have on the operation of the TC2 unit.

e. List and provide any analyses that support the company’s conclusion about the existence or lack of such impacts.

¹ Case No. 2005-00467, Application of Louisville Gas and Electric Company and Kentucky Utilities Company for a Certificate of Public Convenience and Necessity for the Construction of Transmission Facilities in Jefferson, Bullitt, Meade and Hardin Counties, Kentucky (Ky. PSC May 26, 2006).

6. Ms. Slay testified about KU's receipt of temporary easements for up to 10 years from the landowners on whose property the temporary bypasses would be constructed (page 6, lines 13-15). Describe all alternatives considered and all plans made to address the consequences if one or more of the three property owners involved in the appeal of the Certificate of Public Convenience and Necessity in Case No. 2005-00467 prevails in their litigation.

7. With respect to whether the construction of the CDH and Jent temporary lines is the least-cost alternative:

a. Provide all analyses performed by KU to identify alternatives and address their costs.

b. Should such analyses not be reflected in documents, describe them and their results.

c. List and describe all alternatives considered to the extent not provided as part of the response to the preceding two items.

8. Provide the current projected start-up, testing, and commercial in-service dates for the TC2 generating unit.


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DATED OCT 21 2009

cc: All parties

Case No. 2009-00325

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