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 |) | |
| CERTIFICATE TO CONSTRUCT AN ELECTRIC |) | CASE NO. |
| TRANSMISSION LINE FROM ITS A.B. BROWN |) | 2010-00223 |
| PLANT TO THE BIG RIVERS REID EHV |) | |
| STATION |) | |

SITING BOARD STAFF'S FIRST DATA REQUEST TO VECTREN GENERATION, LLC

Board Staff requests that Southern Indiana Gas & Electric Co. D/B/A Vectren Energy Delivery of Indiana, Inc. ("Vectren") file with the Board the original and ten copies of the following information. If a requested document consists of 20 or more pages, Vectren may file two copies. The information requested is due no later than August 30, 2010.

Each copy of the data 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 person who will be responsible for responding to questions relating to the information provided. Careful attention should be given to copied material to ensure that it is legible. Where information requested has been previously provided, in the format requested, reference may be made to the specific location of that information in responding to this information request.

Each response shall be 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.

Vectren 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 Vectren fails or refuses to furnish all or part of the requested information, Vectren shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

- 1. Refer to page 116 of the Electric Transmission Route Selection Technical Report ("Technical Report"), filed with the Application at Tab 7. Under the heading "Expert Judgment" the Technical Report states that "visual issues" were assigned a weight of 5%, "community issues" were assigned a weight of 25%, "project management" (schedule and cost) issues were assigned a weight of 25%, "construction/maintenance accessibility/reliability" issues were assigned a weight of 25%, and "special permit issues" (COE permits) were assigned a weight of 20%.
- a. Explain in detail why "visual issues" are assigned a relative weight of only 5% as compared to the other issues considered by the Vectren routing team.
- b. Explain in detail whether the criteria to be considered by the Siting Board in determining whether to grant or deny the Application filed in this matter include "community issues," "project management" (schedule and cost) issues,

"construction/maintenance accessibility/reliability" issues, or "special permit issues" (COE permits).

- 2. Refer to page 116 of the Technical Report. Under the heading "Community Issues" the Technical Report states that the transmission line route designated as "Route D" received a score of 5 or "high impact," and the transmission line route designated as "Route C" received a score of 3 or "medium impact."
- a. Explain in detail whether community leaders with whom Vectren met prior to filing the application expressed a preference for Route C, Route D, or another transmission line route—either a route identified in the Technical Report or another route not examined in the Technical Report.
- b. Explain in detail the significance of the number of properties over which Route D would run, as compared to the number of properties over which Route C would run, with regard to their respective scores of 5 and 3 under "Community Issues."
- c. Was the difference between the score of "5" for Route D and the score of "3" for Route C under "Community Issues," primarily the result of the higher number of properties over which Route D would run, as compared to the number of properties over which Route C would run?
- 3. Refer to the Technical Report at page 117. Under the heading "Special Permit Issues" the technical Report states, "[i]t is expected that the Corps of Engineers (USACE) will prefer the Ohio River crossing of Route D over Route C ... because Route C will need a [support] structure placed on Henderson Island in the Ohio River."
- a. If the Siting Board approved Vectren's application and Route C, with no modifications, and if the USACE later denied Vectren a permit to place a

support structure on Henderson Island, would Vectren have to re-apply to the Siting Board for a new construction certificate for its nonregulated transmission line that is the subject of this case?

- b. Refer to "Figure 25: Wetlands" at page 60 of the Technical Report. If the Siting Board required Vectren to use Route D as opposed to Route C, explain in detail what "Special Permit Issues" Vectren would have to address in order to apply for and obtain a permit from the USACE and other regulatory agencies to construct the transmission line and support structures through the wetlands areas shown on the map in Figure 25 of the Technical Report.
- 4. Refer to "Figure 11: Airports & Glide Paths" at page 32 of the Technical Report.
- a. If the Siting Board required Vectren to use Route D as opposed to Route C, and Vectren completed its construction of the transmission line along Route D prior to the Henderson City-County Airport ("airport") implementing its planned expansion, as shown in Figure 11, what restrictions would the placement of the Vectren transmission line pose on the airport's expansion plans?
- b. Assuming the same hypothetical scenario as outlined in Item 4a. above, is it possible that Vectren would have to move the transmission line in order to accommodate the airport's future expansion plans?
- c. If the answer to Item 4b. above is "yes," would Vectren have to reapply to the Siting Board for a new construction certificate in order to move the transmission line?

- 5. Explain in detail whether customers of any electric utility subject to the jurisdiction of the Kentucky Public Service Commission will be subject to higher rates as a result of the construction of Vectren's proposed transmission line.
- 6. Explain in detail whether the transmission line proposed by Vectren could adversely impact the facilities or operations of Henderson Municipal Power and Light ("HMP&L").
- 7. Explain in detail whether the transmission line proposed by Vectren could adversely impact the ability of HMP&L to expand its facilities in the future.
- 8. Explain in detail whether the transmission line proposed by Vectren could adversely impact the facilities or operations of Henderson Water Utility ("HWU").
- 9. Explain in detail whether the transmission line proposed by Vectren could adversely impact the ability of HWU to expand its facilities in the future.
- 10. Explain in detail whether the transmission line proposed by Vectren could adversely impact the ability of HMP&L to operate its supervisory control and data acquisition ("SCADA") systems.
- 11. Explain in detail whether the transmission line proposed by Vectren could adversely impact the ability of HWU to operate its SCADA systems.
- 12. Explain in detail whether the City of Henderson has identified to Vectren any adverse visual impacts it believes the transmission line proposed by Vectren will have on any scenic assets located within its jurisdictional boundaries.
- 13. Explain in detail whether the City of Henderson has identified to Vectren any adverse visual impacts it believes the transmission line proposed by Vectren will have on any scenic assets located outside its jurisdictional boundaries.

- 14. Refer to the two documents titled "Henderson County Property Owner Mailing List," and "Webster County Property Information," found at Tab 4 of the Application, which lists 64 property parcels that are potentially affected by the proposed transmission line and the owners of those properties.
- a. Did Vectren send an invitation letter to the July 6, 2010 public meeting to all of the owners of the 64 property parcels listed in the documents in Tab 4 of the Application?
- b. Please list any property owners who were not notified by mail of the July 6, 2010 public meeting or whose invitation was returned due to an incorrect address and/or no forwarding address.
- 15. How many members of the public attended the July 6, 2010 public meeting?
- a. Provide a copy of any minutes, attendance sheets, or other documents produced at the July 6, 2010 public meeting.
- b. Did Vectren send a follow-up letter to those property owners who did not attend the July 6, 2010 public meeting?
- c. If the response to Item 15b, above, is "yes," how many property owners were sent a follow-up letter and how many property parcels does that number reflect?

16. Provide a map showing both Route C and Route D from the AB Brown Generating Station to the point where they share a common route to the Reid Substation. The map shall be a single oversize map, at a scale of 1" = 3,500' or of greater detail, with a base map of aerial photography and the road network.

Executive Director

Public Service Commission

P.O. Box 615

Frankfort, KY 40602

DATED: _ AUG 2 3 2010

cc: Parties of Record

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