

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

SITING BOARD STAFF'S FIRST INFORMATION REQUEST
TO HENDERSON WATER UTILITY

Henderson Water Utility ("HWU"), pursuant to 807 KAR 5:001, is to file with the Commission the original and 10 copies of the following information, with a copy to all parties of record. If a requested document consists of 20 or more pages, HWU may file two copies. The information requested is due no later than September 13, 2010. 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.

HWU 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 HWU fails or refuses to furnish all or part of the requested information, HWU 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. Refer to page 2 of HWU's August 16, 2010 Motion for Intervention, in which HWU states that "the proposed route for the Vectren line and its subsequent operation will directly and adversely affect property owned and maintained by HWU."

a. Explain in detail HWU's assertion that the proposed route for the transmission line proposed in Vectren's July 15, 2010 application in this case "will directly and adversely affect" HWU's property.

b. Provide any data, reports, analyses, or any other information in HWU's possession which support HWU's assertions regarding adverse effects on HWU's property from Vectren's proposed transmission line.

2. Refer to page 2 of HWU's August 16, 2010 Motion for Intervention, in which HWU states that "the proposed route of the Vectren line will adversely affect HWU operations and obligations"

a. Explain in detail HWU's assertion that the proposed route for the transmission line proposed in Vectren's July 15, 2010 application in this case will adversely affect HWU's operations and obligations.

b. Provide any data, reports, analyses, or any other information in HWU's possession which support HWU's assertion that Vectren's proposed transmission line will adversely affect HWU's operations and obligations.

3. Refer to page 2 of HWU's August 16, 2010 Motion for Intervention, in which HWU states that Vectren's proposed transmission line "will have a significant adverse impact upon legal, scenic, historic, aesthetic and perhaps archeological assets and property of HWU and [the] Commonwealth."

a. Explain in detail HWU's assertion that Vectren's proposed transmission line will have a significant adverse impact upon:

- (1) Legal assets and property of HWU and the Commonwealth.
- (2) Scenic assets of HWU and the Commonwealth.
- (3) Historic assets of HWU and the Commonwealth.
- (4) Aesthetic assets of HWU and the Commonwealth.
- (5) Archeological assets of HWU and the Commonwealth.

b. Provide any data, reports, analyses, or any other information in HWU's possession which support HWU's assertion that Vectren's proposed transmission line will adversely affect "legal, scenic, historic, aesthetic and perhaps archeological assets and property of HWU and [the] Commonwealth."

4. Refer to page 2 of HWU's August 16, 2010 Motion for Intervention, in which HWU states that Vectren's proposed transmission line "will be in violation of applicable law."

a. Explain in detail HWU's assertion that Vectren's proposed transmission line will violate applicable law.

b. Provide any data, reports, analyses, or any other information in HWU's possession which support HWU's assertions regarding the legality of Vectren's proposed transmission line.

5. Refer to page 2 of HWU's August 16, 2010 Motion for Intervention, in which HWU states that Vectren's proposed transmission line "will adversely impact the ability of HWU to comply with existing legal orders and obligations and to conduct its business of providing water to its customers, both current and future."

a. Explain in detail HWU's assertion that Vectren's proposed transmission line will inhibit HWU's ability to comply with existing legal orders and obligations.

b. Provide any data, reports, analyses, or any other information in HWU's possession which support HWU's assertions that Vectren's proposed transmission line will inhibit HWU's ability to comply with existing legal orders and obligations.

c. Explain in detail HWU's assertion that Vectren's proposed transmission line will inhibit HWU's ability to provide adequate service to its current and future customers.

d. Provide any data, reports, analyses, or any other information in HWU's possession which support HWU's assertions that Vectren's proposed transmission line will inhibit HWU's ability to provide adequate service to its current and future customers.

6. Explain in detail whether HWU has proposed any alternative route for the transmission line to Vectren.

7. Provide, in both electronic (.pdf) format and paper format, a copy of any maps in HWU's possession of any alternative transmission line routes that HWU has proposed to Vectren for its proposed transmission line.



Jeff Derbuen
Executive Director
Public Service Commission
P.O. Box 615
Frankfort, KY 40602

DATED: SEP - 1 2010

cc: Parties of Record

Bob Amato
Energy and Environment Cabinet
500 Mero Street
Frankfort, KY 4061

Mary-James Young
Senior Regulatory Counsel
Vectren Corporation
One Vectren Square
Evansville, IN 47708

Sue Baker
Office of the County Judge/Executive
Courthouse - 20 N. Main
Henderson, KY 42420

Honorable Jason R Bentley
Attorney at Law
McBrayer, McGinnis, Leslie & Kirkland PLLC
305 Ann Street
Suite 308
Frankfort, KY 40601

Tommy Chandler
218 Benjamin Terrace
Providence, KY 42450

William S Doty
President
Southern Indiana Gas & Electric Co.
One Vectren Square
Evansville, IN 47708

Ken Robinson
Cabinet for Economic Development
Old Capitol Annex
300 West Broadway
Frankfort, KY 40601

Honorable George L Seay, Jr.
Attorney at Law
Wyatt, Tarrant & Combs, LLP
250 West Main Street
Suite 1600
Lexington, KY 40507-1746