

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

SITING BOARD STAFF'S SECOND 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 six 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 December 16, 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.

Refer to the comments filed into the record of this matter by the principals of Willie McLaren, LLC on December 9, 2010, in which they state:

The existing easement could and should be used. The proposed easement envisions "H" type transmission line supports. The existing easement can accommodate the proposed line if the easement uses monopole transmission lines that accommodate the current user, the proposed user, and future users. The visual impact is diminished, the loss of crop land lessened, and future expenses become avoidable using monopole equipment and engineering.

Refer also to page 3 of Vectren's October 14, 2010 amended application, in which Vectren describes the southernmost portion of its proposed transmission line route as:

[i]ntercepting and paralleling an existing Henderson Municipal Power and Light (HMPL) 161 kV Transmission Line in a Southeast direction through Henderson County (and entering Webster County) to Big River's Reid

Generating Station at N 873737.51 E 2828939.07, which is the endpoint for the 345kV Route.

1. Explain in detail whether Vectren considered using steel monopole support structures (“steel monopoles”) for the construction of its proposed transmission line along the portion of the route that would parallel the existing 161 kV transmission line owned and operated by Henderson Municipal Power & Light (HMP&L) as opposed to the H-frame support structures proposed by Vectren in its amended application.

a. If “yes,” provide an explanation of why Vectren determined not to use steel monopoles along the portion of the proposed route that would parallel HMP&L’s existing 161 kV transmission line.

b. If “no,” explain why Vectren did not consider using steel monopoles along the portion of the proposed route that would parallel HMP&L’s 161 kV transmission line.

2. Explain in detail whether Vectren considered co-locating its proposed transmission line in HMP&L’s existing right-of-way and on HMP&L’s existing support structures.

a. If “yes,” explain in detail why Vectren determined not to co-locate its proposed transmission line in HMP&L’s existing right-of-way and on HMP&L’s existing support structures.

b. If “no,” explain in detail why Vectren did not consider co-locating its proposed transmission line in HMP&L’s existing right-of-way and on HMP&L’s existing support structures.

3. Explain in detail whether Vectren considered co-locating its proposed transmission line in HMP&L’s existing right-of-way and on new support structures.

a. If “yes,” explain in detail why Vectren determined not to co-locate its proposed transmission line in HMP&L’s existing right-of-way and on new support structures.

b. If “no,” explain in detail why Vectren did not consider co-locating its proposed transmission line in HMP&L’s existing right-of-way and on new support structures.

4. Explain in detail whether there are any reliability contingencies that influenced Vectren’s decision not to co-locate the proposed transmission line with HMP&L’s 161 kV transmission line in the same right-of-way and on the same support structures.

5. Explain in detail the difference in cost between constructing the transmission line as proposed by Vectren and constructing the transmission line in the same right-of-way and on a single set of steel monopoles with HMP&L’s 161 kV transmission line.

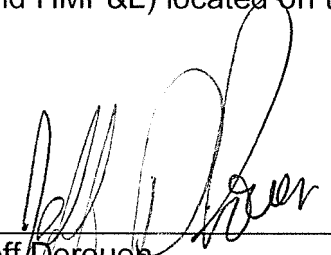
6. Assuming, hypothetically, Vectren had designed its proposed transmission line to be in the right-of-way and on the same set of support structures as HMP&L’s existing 161 kV transmission line, explain in detail the construction process, including a general description of the timeline such construction process would follow.

7. Would HMP&L’s existing 161 kV transmission line have to be de-energized in order for Vectren to move the HMP&L transmission line into one right-of-way and onto the same set of support structures with Vectren’s proposed transmission line?

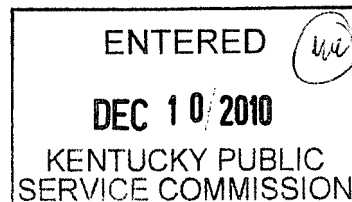
a. If "yes," explain in detail whether de-energizing HMP&L's existing 161 kV transmission line would affect electric service or reliability in the region while the construction process was underway.

b. If "yes," how long would HMP&L's existing 161 kV transmission line have to be de-energized during such construction?

8. Assuming, hypothetically, Vectren had designed its proposed transmission line to be located in the same right-of-way and on the same set of support structures as HMP&L's existing 161 kV transmission line, explain in detail the operational and maintenance issues which might arise from having two sets of transmission lines owned and operated by two separate utilities (Vectren and HMP&L) located on the same set of support structures.



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DATED: _____

cc: Parties of Record