

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF DUKE ENERGY)	
KENTUCKY, INC. FOR A CERTIFICATE OF)	
PUBLIC CONVENIENCE AND NECESSITY TO)	CASE NO.
CONSTRUCT A 138 KV TRANSMISSION LINE AND)	2019-00251
ASSOCIATED FACILITIES IN BOONE COUNTY,)	
KENTUCKY (OAKBROOK TO AERO)	
TRANSMISSION LINE PROJECT))	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO DUKE ENERGY KENTUCKY, INC.

Duke Energy Kentucky, Inc. (Duke Kentucky), pursuant to 807 KAR 5:001, is to file with the Commission the original and an electronic version of its responses to the following information. The information requested herein is due on October 10, 2019. Responses to requests for information in paper medium shall be appropriately bound, tabbed, and indexed. Electronic documents shall be in portable document format (PDF), shall be searchable and shall be appropriately bookmarked.

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 the 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.

Duke Kentucky shall make timely amendment to any prior response if Duke Kentucky 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 Duke Kentucky fails or refuses to furnish all or part of the requested information, Duke Kentucky shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall 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 filing a paper containing personal information, Duke Kentucky shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to the application, paragraph 5, and the Direct Testimony of Edward F. Kirschner, page 5.

a. Provide an estimation of the load growth related to the proposed transmission project for each year from 2019 through 2021.

b. Provide the number of customers that Duke Kentucky has for each of the five years ended December 31, 2018, and as of June 30, 2019.

c. Identify and explain the system reliability issues associated with Duke Kentucky's transmission and distribution systems that will be addressed by the proposed transmission project.

2. Refer to the application, paragraph 7, and Exhibit 6, page 6 of 60. Explain the discrepancy in the width of the right-of-way.

3. Refer to the application, paragraph 28, the Direct Testimony of Yanthi W. Boutwell (Boutwell Testimony), page 13, and the Direct Testimony of Sarah E. Lawler, page 4. Explain in more detail how the transmission project will be financed with respect to the circumstances that would give rise to the use of debt instruments.

4. Refer to the application, paragraph 29. Provide a breakdown of the total cost by the Federal Energy Regulatory Commission account number.

5. Refer to the application, Exhibit 6, page 7 of 60, regarding the line route evaluation report prepared by Stantec Consulting Services Inc. (Stantec Report). Map ID 3 identifies “KY18 ACRES LLC” as the property owner of the tract of land north of the proposed route. Explain whether KY18 ACRES LLC was provided notice of the proposed transmission line route.

6. Refer to the application, Exhibit 6, page 8 of 60. The Stantec Reports states that no public meeting to review the alternative routes was conducted given that Duke Kentucky had “willing landowners for the easements.” Refer also to the application, Exhibit 10, pages 4–5 of 5. Confirm that the only property owners whose property the transmission line right-of-way is proposed to cross are Duke Kentucky, the Kenton County Airport Board, and the Union Light, Heat, and Power Company.

7. Refer to the application, Exhibit 6, page 10 of 60, regarding the tree clearing and earthwork that has already occurred along the preferred route. Confirm that the tree clearing and the earthwork were not done in connection with the proposed transmission line. If confirmed, explain the nature of the tree clearance and earthwork that has already occurred.

8. Refer to the application, Exhibit 6, page 13 of 60, regarding the comparative evaluation of the four alternative routes. Explain in detail how Duke Kentucky and Stantec arrived at weights assigned to each of the Criteria Group.

9. Refer to the application, Exhibit 6, page 19 of 60, regarding the statement that roadside siting is less optimal for transmission line voltages of 138 kV and above because of access constraints during construction and operations and the risk of the roadway being widened in the future necessitating in the relocation of the transmission line. Explain whether Duke Kentucky has engaged in any discussions with state or county officials regarding the potential for widening Burlington Pike and Aero Parkway in the future and also explain how Duke Kentucky intends to mitigate this risk given that the preferred route runs parallel to a roadway for a significant portion of the length of the route.

10. Refer to the application, Exhibit 6, page 21 of 60, regarding the Stantec recommendations that Duke Kentucky remain in contact with municipal authorities and affected property owners to ensure that pole siting does not interfere with existing or proposed underground utilities and that Duke Kentucky coordinate with the appropriate roadway authorities to confirm that pole placement does not encroach on clear zones and that future road widening projects are taken into consideration. Explain how Duke Kentucky intends to carry out these recommendations.

11. Provide in portable document format (PDF) the maps contained in Figures 1–6 of the Stantec Report that provides for a legible view of the markings and the legend. An oversized PDF document for each of the maps is acceptable.

12. Refer to the Boutwell Testimony, page 4, lines 10–11. Provide an estimate of when the engineering and design work for the proposed transmission project will be finalized.

13. Refer to the Boutwell Testimony, page 7, lines 1–13. Provide a map rendering which identifies the footprint of the Amazon Prime Air Hub, the Northern Kentucky International Airport, and the proposed transmission project.

14. Refer to the Boutwell Testimony, page 8, lines 3–7. Provide the timeline for when the Amazon Prime Air Hub facility will reach the following loads: 20 MW, 40 MW, and 60 MW.

15. Refer to the Boutwell Testimony, page 10, lines 3–5. Provide an estimate as to when Duke Kentucky anticipates obtaining the final easements needed for the proposed transmission line.

16. Refer to the Boutwell Testimony, page 10, lines 10–23.

a. Provide an estimate as to when Duke Kentucky anticipates the plans with Amazon’s site developer regarding access during construction and post-construction to be completed.

b. Explain whether landowners other than those identified in Exhibits 9 and 10 to the application will be impacted if the proposed centerline is changed.

c. Explain whether a change in the proposed centerline could occur along portions of the proposed route corridor that is located outside of Amazon Prime Air Hub’s footprint.

17. Refer to the Boutwell Testimony, pages 13, line 19 through page 14, line 2, stating that the driver for the proposed transmission project is “being able to meet a customer’s schedule for when it will need electric service.”

a. Confirm that the customer referred to in the testimony is the Amazon Prime Air Hub.

b. If confirmed, explain why Amazon is not being required to contribute to the cost of the transmission project when Amazon is the reason for the construction of the transmission project.

18. Refer to the Direct Testimony of John K. Hurd (Hurd Testimony), page 4, lines 1–3. Explain how a 1.3 square mile study area rather than a larger study area was determined to be reasonable by Duke Kentucky.

19. Refer to the Hurd Testimony, page 6, lines 3–12.

a. Explain in detail why the Duke Energy standard methodology to evaluate transmission routes is better suited to evaluate a small study area as compared to the Kentucky Electric Power Institute/Georgia Transmission Corporation’s Methodology (Kentucky EPRI Methodology).

b. Provide the similarities and differences between the Kentucky EPRI Methodology and Duke Energy’s standard methodology for evaluating transmission routes.

20. Refer to the Hurd Testimony, page 9, line 20 through page 10, line 9, concerning Duke Kentucky’s public outreach efforts.

a. Explain whether there was any positive or negative feedback from local officials or relevant regulatory agencies.

b. Explain whether Duke Kentucky contacted any landowners other than those identified in Exhibits 9 and 10 to the application.

c. Provide any positive or negative communications received through the project website, the toll-free phone number, or the email address associated with the proposed transmission line project.

d. Explain whether Duke Kentucky has received any other communications related to the proposed transmission line project. If so, provide a summary of the nature of those communications.

21. Refer to the Hurd Testimony, page 12, lines 20–22, noting that Route B ranked as the best route overall, but this route would affect owners on properties that are planned for future development. Identify the owners of the properties that would be impacted by Route B and explain what the future development of these properties would entail.

22. Refer to the Hurd Testimony, page 13, line 6–8. Explain what is meant by the term “alignment shifts.”

23. Refer to the Hurd Testimony, page 13, line 15 through page 15, line 3. Provide a schedule identifying each environmental and engineering permit that will be needed along with an estimated timeline of when the application requesting each permit will be submitted and when a decision regarding each permit is expected to be obtained.

24. Refer to the Direct Testimony of Edward R. Kirschner (Kirschner Testimony), page 4, line 20 through page 5, line 2.

a. Provide the capacity of the current Oakbrook substation.

b. Provide the capacity of the Oakbrook substation after its upgrade.

c. Provide the capacity of the proposed Aero substation.

25. Refer to the Kirschner Testimony, page 5, lines 4–13. Provide the projected future load that is expected to increase in the Boone County, Kentucky, area within the next five years.



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DATED SEP 27 2019

cc: Parties of Record

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