

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY TO CONSTRUCT AND ACQUIRE A 345 KV TRANSMISSION LINE IN MEADE COUNTY, KENTUCKY))))))	CASE NO. 2019-00417
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COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO BIG RIVERS ELECTRIC CORPORATION

Big Rivers Electric Corporation (BREC), pursuant to 807 KAR 5:001, is to file with the Commission the original and six copies of the following information, with copies to all parties of record. The information requested herein is due on March 9, 2020. Responses to requests for information in paper medium 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 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.

BREC shall make timely amendment to any prior response if BREC 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 BREC fails or refuses to furnish all or part of the requested information, BREC 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, BREC 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 2. Confirm that projects F&G are contingent upon the Commission approval of the Certificate on Public Convenience and Necessity in Case No. 2019-00370.¹
2. Refer to the application, paragraph 14. State BREC's anticipated return on investment and the amount of offsets to future rate increases.
3. Refer to the application, paragraph 17. Explain whether the rights-of-way have been acquired yet and whether BREC has encountered any public resistance to the project.
4. Refer to the application, paragraph 18.

¹ Case No. 2019-00370, *Electric Joint Application of Louisville Gas and Electric Company, Meade County Rural Electric Cooperative Corporation, and Big Rivers Electric Corporation for (1) Approval of an Agreement Modifying an Existing Territorial Boundary Map and (2) Establishing Meade County Rural Electric Cooperative Corporation as the Retail Electric Supplier for Nucor Corporation's proposed Steel Plate Mill in Buttermilk Falls Industrial Park in Meade County, Kentucky* (filed Oct. 18, 2019).

a. What is the monetary impact resulting from the higher transmission rates on BREC's system under MISO's Open Access Transmission Tariff?

b. Explain the reasoning for transferring Project F to Louisville Gas and Electric Company (LG&E) upon its completion.

c. Once the switching station is complete and transferred to LG&E, explain the extent to which BREC anticipates drawing energy through the station to serve the Nucor load.

5. As 807 KAR 5:120, Section 2(2)a, provides: "The map detail shall show the location of the proposed transmission line centerline and right of way, and boundaries of each property crossed by the transmission line right of way" The proposed route map submitted in paragraph 13 of the application does not show those features. Submit new maps with centerlines, right-of-way boundaries, and property boundaries. Be sure to label the properties with the names of the owners that correspond to the Property Owner Listing in the application, Exhibit F.

6. Provide a copy of the map included in the letter to property owners (Exhibit E) and described in paragraph 21 of the application.

7. State whether any of the first class letters described in paragraph 21 of the application were returned to BREC. If so, please describe how the property owner was notified.

8. Identify the property owners that Hunter Rickard, Real Estate Agent at BREC, has contacted.

9. Refer to the application, Appendix C, Routing Study, pages 48, 49, 54, and 55 for the merits of the proposed route selection in which Route B has better scores using

the EPRI model but Route A was selected as the proposed route using the Expert Judgment Model.

a. State whether the Expert Judgment Model is part of the EPRI Model.

b. Identify the BREC employees and their positions who designed the Categories and Weights on page 56 for the Expert Judgment Model.

c. State whether the Expert Judgment Model has been used in any electric transmission line Certificate of Public Convenience and Necessity cases in Kentucky.

d. Identify the transmission line experts on the project team that determined Route A was the better choice using the Expert Judgment Model.

e. On page 49, it appears that Route B is less expensive by \$311,302. Explain why Route B was not selected as the preferred route when Cost was weighed the most at 40 percent in the Expert Model.

f. Considering the Community Criteria on the Expert Judgment Model, it appears that Route A was given the best score since the route goes on the outside of a property near the proposed Redmon Road substation, and it would not affect a possible new apartment complex. Fully explain how the number of residences (four on Route A and two on Route B) and the agricultural building (one on Route A) were evaluated by the experts.

g. According to Expert Judgment, Route A is preferred to Route B's proximity to sensitive bat habitat. Provide the distance from the cave, which may have sensitive bats, to Route A and to Route B. State also whether these sensitive bats have been observed in the area or in the cave.

h. Proximity to sensitive bat habitat appears to affect the risk of schedule delay and also natural environment consideration in the Expert Judgment Model. By using proximity to bats in both categories, the risk of schedule delay, and natural environment considerations, state whether the bat factor is double counted and, thus, results in Route A being the preferred route.

i. On the new maps requested in Item 5 above, please indicate the 4 residences and 1 agricultural building that are within 300 feet of the centerline for Route A. For Route B, please indicate the location of the proposed new apartment complex. On both the proposed and alternative route maps, indicate which property near the proposed Redmon Road substation received consideration in the Expert Judgment Model.

j. Identify the owner of the property of the proposed new apartment complex. How far along are the plans for this apartment complex? Who is the contractor for the apartment complex? How many units will it have? Have plans been submitted to planning and zoning, or to water, sewer, or electric utilities?

k. Identify the property owners of the 4 residences and 1 agricultural building that are within 300 feet of the centerline for Route A. State whether these property owners were notified by letter of the proposed transmission line.

l. Explain the statement on page 55 that "Route A has a slightly better score than Route B in terms of reliability due to the fact that Route A has less angles" when the raw data on page 48 indicates that each route has 6 angles with Route B having fewer sharp angles.



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DATED FEB 24 2020

cc: Parties of Record

Case No. 2019-00417

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