

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF KENTUCKY)	
UTILITIES COMPANY FOR A CERTIFICATE OF)	CASE NO.
PUBLIC CONVENIENCE AND NECESSITY FOR)	2022-00066
THE CONSTRUCTION OF TRANSMISSION)	
FACILITIES IN HARDIN COUNTY, KENTUCKY)	

COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION
TO KENTUCKY UTILITIES COMPANY

Kentucky Utilities Company (KU), pursuant to 807 KAR 5:001, is to file with the Commission an electronic version of the following information. The information requested is due on May 6, 2022. The Commission directs KU to the Commission's July 22, 2021 Order in Case No. 2020-00085¹ regarding filings with the Commission. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the question to which the response is made and 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

¹ Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC July 22, 2021), Order (in which the Commission ordered that for case filings made on and after March 16, 2020, filers are NOT required to file the original physical copies of the filings required by 807 KAR 5:001, Section 8).

response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

KU shall make timely amendment to any prior response if KU obtains information that indicates the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which KU fails or refuses to furnish all or part of the requested information, KU 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 applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, KU 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 KU's response to Wade Farm Management, LLC's First Request for Information (filed April 21, 2022) (Wade Farm's First Request), Item 5, and KU's response to Frank Brown and Martha Brown's First Request for Information (filed April 21, 2022) (Brown's First Request), Item 3. In these responses KU references working with the property owners. Confirm that KU did not give notice to property owners within the 1,000-foot corridor of the proposed centerline, unless the proposed transmission line route passed directly over the property.

2. Refer to KU's response to Wade Farm's First Request, Item 22. This response indicates KU has not conducted any on-site field studies.

- a. Confirm that KU has not done any on-site field studies.
- b. State when KU anticipates performing on-site field studies.
- c. Refer also to the Application, numbered paragraph 4, which states that KU anticipates beginning pre-construction in July 2022. Explain what pre-construction activities KU anticipates beginning in July 2022, given that the statutory deadline for issuance or denial of the requested CPCN is June 28, 2022, and no on-site field studies have been performed.

3. Provide a map of the existing KU easements as well as any other known utility easements for the properties directly affected by all the transmission line routes superimposed on the maps provided in KU's response to Commission Staff's First Request for Information (filed April 8, 2022), Item 1.

4. Explain whether KU considered future load requirements in the location of the proposed transmission line routes and proposed substations, and if so, how this affected the routes and locations chosen.

5. Refer to KU's response to Commission Staff's Second Request for Information (filed April 21, 2022) (Staff's Second Request), Item 4.

- a. Confirm that no additional easements will be requested to place the new East Kentucky Power Cooperative (EKPC) 69 kV line.
- b. Explain whether EKPC is responsible for removing the 69 kV line and constructing the line again to co-locate with KU's 138 kV line.

c. Provide any maps or diagrams depicting the co-location of the new 69 kV EKPC line and the new 138 kV KU line.

d. Confirm that the new 69 kV EKPC line will not be serving any of the same area as KU intends to serve with this new construction.

6. Refer to KU's response to Staff's Second Request, Item 1. Provide a map that illustrates the data request response. Include all the features mentioned in the statement: ". . . the existing Brown North – Hardin 345kV line will be segmented near the Hardin County Substation (West tap point) and rerouted into and out of the new Glendale South Substation, tying back into the 345kV line at the East tap point (a total of approximately 9 miles of new 345 kV line). The existing 2.7 mile segment of line between the two new tap points will be retired and removed. This will create one 345 kV source into the Glendale South Substation coming from the Hardin County Substation (i.e., the Glendale South – Hardin County 345 kV line), and a second 345 kV source from the Brown North Substation (i.e., the Glendale South – Brown North 345 kV line)." The new map should be similar to the maps in the Application, Exhibit 5, page 1, and Exhibit 6, page 1, without the blue index lines. Symbolize the area of the Glendale Megasite and keep the road network as shown. Include and label the Hardin County Substation, the Brown North Substation, and the proposed Glendale South Substation. Keep the existing and proposed transmission lines as shown in Exhibits 5 and 6 and add symbolization and label the 345 kV transmission line segment that will be retired and removed. Include the existing EKPC 69 kV line as well as the planned EKPC 69 kV line.

7. Provide the amount the retirement and removal of the 2.7 mile segment of the 345 kV line will cost. Explain whether it is included with the cost of this project.

8. Refer to the Team Spatial Siting Study, page 6, which defines the limits of the study area. Explain why the initial area of study does not extend beyond Route 31W and take into account a further length of the 345 kV line towards the Brown North Substation.

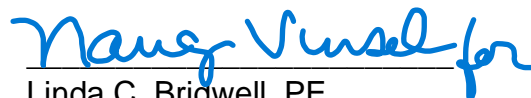
9. Refer to KU's response to Brown's First Request, Items 11, 12, and 13. Submit a similar map of the Brown parcels with yellow boundaries and the West and East 345 kV routes proposed by KU to the proposed substation.

10. Clarify how moving the proposed centerline 500 feet for the 345 kV lines is related to the 200-foot right of way (ROW) and the parcel boundaries by commenting on the following two statements:

a. If the centerline is moved 500 feet within a parcel, this will keep the centerline and the ROW within a 1,200-foot corridor.

b. In order to keep the ROW within a parcel, if the centerline is moved 500 feet or less, it must be 100 feet from the parcel boundary.

11. Provide the distance of the nearest residence from each of the proposed substations. Provide the estimated noise level from the substation at each of the nearest residences.



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DATED APR 29 2022

cc: Parties of Record

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