

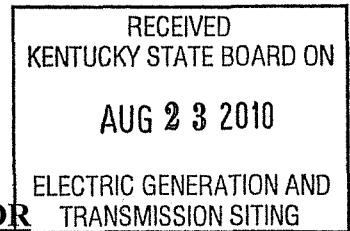
COMMONWEALTH OF KENTUCKY

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 CONSTRUCTION CERTIFICATE TO)
CONSTRUCT AN ELECTRIC TRANSMISSION)
LINE FROM ITS A.B. BROWN PLANT TO THE)
BIG RIVERS EHV STATION)

CASE NO.
2010-00223



**FIRST DATA REQUEST OF INTERVENOR
HENDERSON MUNICIPAL POWER & LIGHT**

Comes Henderson Municipal Power & Light (hereinafter referred to as "HMP&L"), by counsel, and in accordance with the Procedural Schedule entered in this matter, files the following Data Request to be responded to by the Applicant no later than August 30, 2010:

1. Please provide any and all data, reports or other information which has not been previously provided in the Application or to HMP&L which is associated with, is in any manner related to, or was prepared in connection with the Application filed herein and which impacts and/or effects the property and facilities of HMP&L. This request includes but is not limited to: data, reports, information, documents, files, drawings, charts, records, analyses, memoranda, diagrams, maps, calculations, letters, communications of all types, photographs, images, notes, recordings, correspondence, computer data including computerized electronic mail, videotapes, films, forms, tests, test data, test methodologies, graphs, telephone reports, or any and all other informational

accumulations or data compilations from which information can be obtained or translated including all forms of computer storage and retrieval. Additionally, this request includes, but is not limited to, any and all information or data as described herein which has been redacted from the Application or any other filing in this matter by the Applicant.

2. Please provide all plats and drawings, sketches, reports or calculations of any nature of the proposed location of the transmission line including but not limited to, the extent of the easements sought. These plats and drawings should be from the point where the proposed transmission line crosses the Ohio River to the point of its termination at the Reed EHV substation. These drawings of the transmission line and its easements should identify the current location of all HMP&L existing transmission lines and poles including associated easements and should further locate the lines of all properties currently owned by HMP&L which will be affected, crossed or adjacent to the proposed transmission line and its easement boundaries. Particularly, emphasis should be placed upon locations where the proposed transmission line and its easement will cross over or parallel existing distribution and transmission lines and facilities owned or operated by HMP&L.

3. Please provide all plan and profile sheets, including but not limited to, those diagrams and designs, plats or maps or calculations which show side elevations, and/or aerial views of proposed poles and lines and an evaluation of the proposed transmission line upon existing HMP&L easements and properties. Please provide this information from a point where the proposed line crosses the Ohio River to the point of its termination at Reed EHV substation.

4. Please provide a detailed analysis including appropriate diagrams, maps, plats, sketches and calculations of how the existing HMP&L 69 kV and 161 kV distribution and transmission lines which operate closed between BREC Henderson County substation and the Reed plant 69 kV and 161 kV substations may be affected by the proposed line. Please include an analysis of how any power flow between the Brown and Reed plants may result in and/or affect flows through the HMP&L transmission system.

5. Please describe in detail, using appropriate diagrams, maps, plats and supporting calculations, how the fault current increase due to the 345 kV line may impact the HMP&L generating properties as well as its transmission and distribution lines. Please include an analysis of HMP&L substation fault values for all fault types with the 345 kV line included. Please further provide all fault values through the HMP&L lines and substation 4 due to 345 kV line ground fault at its closest point to substation 4 (345 kV angles structure at substation for entry road).

6. Please further provide an analysis of whether the mutual fault flow will require change of HMP&L 161 kV line relaying due to the parallel route which we currently understand is proposed by the Applicant.

7. Please provide in detail an analysis of the load flow change due to the operation of the 345 kV line. Please include in the analysis all maps, diagrams, drawings, reports and calculations including HMP&L 69 kV and 161 kV line flows for normal operating conditions, HMP&L line flows (a) with the 345 kV line in service, and (b) with the 345 kV line open. Please further provide an analysis of the HMP&L 69 kV and 161

kV line flows for power transfer due to loss of generation of the Brown plant (two units) (a) with the 345 kV line in service, and (b) with the 345 kV line open. Please describe the situation with generation lost replaced by BREC and generation to the south of BREC. Further provide an analysis of the affect of the HMP&L 69 kV and 161 kV line flows for power transfer due to loss of generation of Henderson Station Two (two units), Reid Station (one unit), or Green Station (two units) (a) with the 345 kV line in service, and (b) with the 345 kV line open. Explain if this generation loss will be replaced by Vectren in generation to the north of Vectren.

8. Please provide a complete analysis, including all maps, sketches, designs, reports, and calculations, to support the analysis of the affect that the 345 kV line which is proposed to parallel in close proximity to the existing HMP&L lines and substation 4, will have on (a) the 900 megahertz SCADA radios; (b) on the power line carrier on HMP&L 161 kV line; (c) and on the fiber optic circuit on HMP&L 161 kV line.

9. Please describe in detail whether there will be an unbalanced power flow if single pole tripping is utilized and further the affects of such an unbalanced power flow on the current HMP&L system. Please include any and all diagrams, maps, charts, plats, analysis and calculations in support of your response.

10. Please provide a complete analysis of the affect of the NESC horizontal line clearance with maximum crosswind, including all data, maps, diagrams, designs, plats and reports in support of your response. Please evaluate the worst case scenario which would exist in each scenario, i.e. when the HMP&L structure is located at the point of mid/maximum span of the proposed 345 kV transmission line.

11. Please provide all “Maps of Residential Neighborhoods, Schools and Parks within One Mile of the Proposed Facilities” and the “List of all Affected Property Owners in Henderson County and Webster County” identified in the Table of Contents of the Application, including the testimony of Benjamin Shinabery regarding the same.

12. Please provide the “Diagram of Support Structures” identified in the Table of Contents to the Application and the testimony of William S. Doty regarding the same.

13. Please provide the “Cover Sheet and Index of Drawings (Maps)” which is referenced as being in Volume 2 of the Application.

14. Please provide the “Map of the North Portion of the River Crossing” as identified in the Table of Contents of the Application and the testimony of Ben Shinabery regarding the same.

15. Please provide the “Maps” which purportedly appear in Volume 2 of the Applications on pages 19 through 45 and the testimony of Ben Shinabery regarding the same.

These items have all been listed as being contained within the Application, but have not been made available to the Intervenors.

WHEREFORE, Henderson Municipal Power & Light respectfully requests that the Applicant fully respond to this Data Request by no later than August 30, 2010.

So moved this the 23rd day of August, 2010.

By: 

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*Counsel for Henderson Municipal Power &
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CERTIFICATE OF SERVICE

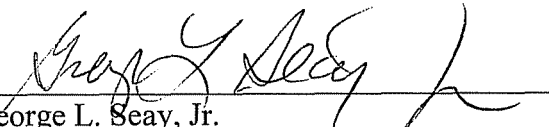
This is to certify that the original and ten true and correct copies of the foregoing has been served upon the following, by hand delivery, at the filing office of the Kentucky Public Service Commission, on this the 23rd day of August, 2010:

Hon. Richard W. Bertelson, III
Counsel
Public Service Commission
211 Sower Blvd
P.O. Box 615
Frankfort, KY 40602-0615

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

and via U.S. Mail, postage prepaid to:

Jason R. Bentley, Esq
McBRAYER, McGINNIS, LESLIE & KIRKLAND, PLLC
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Lexington, KY 40507



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Counsel for Henderson Municipal Power & Light