# MCBRAYER, MCGINNIS, LESLIE & KIRKLAND, PLC

ATTORNEYS-AT-LAW

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September 1, 2010

Mr. Jeff Derouen Executive Director Kentucky Public Service Commission Kentucky State Board on Electric Generation & Transmission Siting 211 Sower Boulevard P.O. Box 615 Frankfort, KY 40602-0615

RE: Siting Board Case No. 2010-00223

Dear Mr. Derouen:

Please find enclosed an original and one copy of Vectren's data request to intervenors. Should you have any questions or concerns, please contact me at the number below.

incerely.

Jason R. Bentley Attorney for Vectren Energy Delivery of Indiana McBrayer, McGinnis, Leslie & Kirkland, PLLC 305 Ann Street, Suite 308 Frankfort, KY 40601 (502) 875-1176

## 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 ) CERTIFICATE TO CONSTRUCT AN ELECTRIC ) TRANSMISSION LINE FROM ITS AB BROWN ) PLANT TO THE BIG RIVERS REID EHV STATION )

CASE NO. 2010-00223

# SOUTHERN INDIANA GAS & ELECTRIC CO. D/B/A VECTREN ENERGY DELIVERY OF INDIANA, INC.'S FIRST DATA REQUEST TO INTERVENORS

Southern Indiana Gas & Electric Co. d/b/a Vectren Energy Delivery of Indiana, Inc. (hereafter, Vectren) requests that the Intervenors, City of Henderson, Henderson Water Utility, and Henderson Municipal Power and Light respond with the following requested data:

# Vectren's First Data Request to the City of Henderson

- Please provide a copy of the City's proposed alternate river landing, which was provided to Vectren by a representative of the City on August 3, 2010.
- Please explain how, in the City's proposed alternate river landing proposal, the three proposed crossings of Canoe Creek is a better design of the Brown-Reid 345 kV line than the single crossing established by the Vectren Route study.

- Specifically, please explain how, in the City's proposed alternate river landing proposal, three crossings of Canoe Creek is preferable to a single such crossing from any environmental impacts perspective.
- 4. Please explain how the City's proposed alternate river landing's impacts on residential properties (including proximities to residential properties) is a better design that the design established by the Vectren route study, which maintains a separation from residential properties as required by its route study methodology.
- 5. Please explain how, in the City's proposed alternate river crossing and river landing proposal, closer proximity to both residential properties and a city-owned facility (a fire station) is preferable to the design established by the Vectren Route study.
- 6. Please provide any plans or other documentation (including documentation of discussions) involving relocation or demolition or closure of the fire station which would be impacted by the City's proposed alternate river landing proposal by city officials, elected or appointed.
- 7. Please list the names and qualifications of any experts or consultants engaged, retained, hired or otherwise involved in this matter and a synopsis of each such expert or consultant's expected testimony and any reports, studies, or other documentation which he or she will cite or upon which he or she will rely.

#### Vectren's First Data Request to the Henderson Water Utility

- Please produce a copy of any order or agreed order, settlement document or other similar document between the City or the Henderson Water Utility (HMU) and any federal, state or local regulatory or governmental entity that compels HMU to expands its water treatment facility. (Referring specifically to any "consent decree" cited to Vectren by various city and water utility officials.)
- 2. Please state whether such document, if any such document exists, compel a specific location for any compelled expansion.
- 3. Please state the date any such requirement or compulsion was established with any such regulatory or governmental entity.
- Please provide copies of any designs or construction plans related to any such requirement or compulsion and any other documentation that such design or construction has been initiated.
- Please provide copies of any requests for proposals, requests for bids, or contracts for design work or construction work related to any such requirement or compulsion.
- Please indicate and explain any technical or operational constraints that in HWU's opinion would prohibit the Brown-Reid line from crossing HWU property.
- 7. Please list the names and qualifications of any experts consulted by HWU related to HWU's evaluation of the impacts, if any, of the Brown-Reid's current design on HWU's operations, facilities, expansion plans, etc.

8. Please list the names and qualifications of any experts or consultants engaged, retained, hired or otherwise involved in this matter and a synopsis of each such expert or consultant's expected testimony and any reports, studies, or other documentation which he or she will cite or upon which he or she will rely.

### Vectren's First Data Request to Henderson Municipal Power & Light

- Please produce a copy of any long range plans, expansion plans or consulting agreements the scope of work of which requests preparation of same, for the Henderson Municipal Power & Light (HMPL) Substation 4 and vicinity.
- Please produce a copy of any long range plans, expansion plans or consulting agreements the scope of work of which anticipates or requests preparation of same for any other HMPL facility which HMPL asserts would be impacted (adversely or favorably) by the Brown-Reid project.
- 3. Please list the names and qualifications of any experts or consultants engaged, retained, hired or otherwise involved in this matter and a synopsis of each such expert or consultant's expected testimony and any reports, studies, or other documentation which he or she will cite or upon which he or she will rely.

Respectfully submitted this 1<sup>st</sup> day of September, 2010,

Jason R. Bentley
McBrayer, McGinnis, Leslie & Kirkland, PLLC
305 Ann Street, Suite 308
Frankfort, Kentucky 40601

# **CERTIFICATE OF SERVICE**

I certify a copy of the foregoing was served via US Postal Service First Class Mail, postage prepaid, on the following this  $\frac{151}{2}$  day of September, 2010

Jason R. Bentley McBrayer, McGinnis, Leslie & Kirkland, PLLC 305 Ann Street, Suite 308 Frankfort, Kentucky 40601

George L. Seay, Jr. WYATT, TARRANT & COMBS, LLP 250 West Main Street, Suite 1600 Lexington, KY 40507