

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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IN THE MATTER OF:

PUBLIC SERVICE
COMMISSION

JOINT APPLICATION OF LOUISVILLE GAS)
AND ELECTRIC COMPANY AND KENTUCKY)
UTILITIES COMPANY FOR A CERTIFICATE OF) CASE NO.
PUBLIC CONVENIENCE AND NECESSITY FOR) 2005-00467
CONSTRUCTION OF TRANSMISSION FACILITIES)
IN JEFFERSON, BULLITT, MEADE, AND HARDIN)
COUNTIES, KENTUCKY)

JOINT APPLICATION OF LOUISVILLE GAS)
AND ELECTRIC COMPANY AND KENTUCKY)
UTILITIES COMPANY FOR A CERTIFICATE OF) CASE NO.
PUBLIC CONVENIENCE AND NECESSITY FOR) 2005-00472
CONSTRUCTION OF TRANSMISSION FACILITIES)
IN JEFFERSON, BULLITT, MEADE, AND HARDIN)
COUNTIES, KENTUCKY)

* * * * *

INTERVENORS DENNIS AND CATHY CUNNINGHAM;
CDH PRESERVE, LLC; HARRISON AND HARDIN
FIRST DATA REQUEST TO LOUISVILLE GAS AND
ELECTRIC COMPANY AND KENTUCKY UTILITIES COMPANY

* * * * *

Pursuant to the scheduling order adopted by the Commission in this case, Intervenor Dennis Cunningham and Cathy Cunningham, CDH Preserve, LLC, Lisa Harrison, and Jennifer Hardin, (referred to collectively as "Cunningham") request that Louisville Gas and Electric Company ("LG&E") and Kentucky Utilities Company ("KU") (collectively "LG&E/KU") file with the Kentucky Public Service Commission ("Commission") the following information, with a copy to all parties of record.

1. Any studies, evaluations, discussions, and/or communications concerning alternative routes or alternative configurations for the proposed transmission facilities and all related documents performed by or for LG&E/KU that relate to the location of a transmission line from LG&E's Mill Creek Station, in Jefferson County to the KU Hardin County Substation, near Elizabethtown, Ky.

2. Any studies, evaluations, discussions, and/or communications, including any environmental impact statement or environmental assessment, produced by or on behalf of LG&E/KU or by any federal or state agency, evaluating the environmental impacts of the proposed transmission facilities and alternatives and all related documents.

3. The total combined acreage of the properties that will be affected by the proposal and the total combined acreage of the easements required for the project for Route #1, as described in Case No. 2005-00467 and for Route #2 as described in Case No. 2005-00472.

4. Any studies, evaluations, discussions, and/or communications concerning the historical and cultural resources that may be affected by the proposed transmission facilities and all related documents, for Route #1 and Route #2.

5. An identification and description of all sites on or eligible for the National Register of Historic Places which are in the Area of Potential Effect of the proposed transmission facilities for Route #1 and Route #2.

6. Any studies, evaluations, discussions, and/or communications concerning LG&E/KU's obligation and effort toward complying with section 106 of the National Historic Preservation Act, 16 U.S.C. & 470 et seq., and its implementing regulations, 36 C.F.R. Part 800, and all related documents.

7. Any studies, evaluations, discussions, and/or communications which form the basis for:

a. LG&E/KU's statement at Application, paragraph 6, "Statement of Convenience" that: "The route of the transmission line is designed to serve the projected load with as little negative impact as can be reasonably afforded while maximizing the use of existing facilities and utility corridors to the extent practicable."

b. "In deciding upon the route for this proposed line, the Companies addressed the Commission's directive in its final order in Case No. 2005-0142, to thoroughly review "all reasonable alternatives, including locating the line partially or fully along existing transmission corridors."

c. "the proposed route was determined through extensive study, conducting field surveys, evaluating the

topography along the routes considered and adjusting the routes as appropriate, consistent with sound engineering and regulatory principles.”

d. Please provide all field surveys, evaluations, studies, documentation of adjustments made, and the engineering and regulatory principles referred to in that statement.

8. Please provide all correspondence between LG&E/KU and all federal and state agencies, including but not limited to the Department of the Army (or related entities acting for or on behalf of Fort Knox US Army Garrison; United States Department of Interior; Kentucky Department of Fish & Wildlife Resources; United States Army Corps of Engineers, regarding the subject of these applications.

9. Please provide any studies, reports, or other written documentation of the “upcoming voltage problems” in Hardin County that provide a basis for the need to construct the subject transmission line.

10. What is the current estimate of the date by which LG&E/KU will need to have TC2 on line?

11. Is the current estimate for the need for the subject line to address “upcoming voltage problems” in Hardin County still from 5 to 8 years after the TC2 comes on line?

12. What alternatives other than the subject transmission line did LG&E/KU consider as a remedy for the "upcoming voltage problems" in Hardin County? Provide all studies or other documentation of all such alternatives considered and the reasons they were not implemented.

13. Please provide the *Alternative Route Analysis and Evaluation* model taken from EPRI and GTC (Georgia Transmission Lines) used by Linear Projects and Photo Science referenced in testimony of Doherty, and identify any variations from the Georgia model that were used in this case.

14. Please provide the results of using the above model (Request # 13) with the criteria adjusted to reflect the results of the stakeholders' meeting held in Lexington, Kentucky on February 28, 2006.

15. Please identify by product name any herbicides or pesticides that will be used, if any, and the manner of application for the transmission line right-of-way.

16. Have LG&E/KU made application to any federal or state agency for any permits, licenses, authorizations or other approvals necessary for these proposed transmission facilities?

17. If the answer to Question 16 is "yes," please identify each application by date and agency to which application was made.

18. Does LG&E/KU intend to acquire the necessary rights-of-way on a voluntary basis or through condemnation?

19. Please provide a copy of all applications that have been made to any federal and/or state agency related to any permit or other authorization for the proposed transmission facilities and provide a copy of the response, if any, from such agency.

20. Please provide the identification of all residences that would be acquired, by owners and street address, and the proximity of the residence to an existing transmission line, and the identification of all listed or eligible NRHP properties within 3,000 feet of the routes identified as:

ROUTE ACQ

ROUTE ACU

ROUTE ADC

ROUTE ADS

ROUTE ADK

ROUTE AGU

ROUTE E

ROUTE G

ROUTE AGW

ROUTE ADG

21. For each of the above routes (Request #20) please describe the portion of the line that would be rebuilt and

the portion of the line that would be collocated without rebuilding existing lines, and provide the estimated cost of rebuilding.

22. Please provide all field surveys and other site specific data collected by or for LG&E/KU for each of the above routes (Request #20).

23. Please identify all existing rights-of-way and utility lines within the proposed macro-corridor. As to each of the proposed transmission line segments, identify which rights-of-way and transmission lines are proposed to be used for the project. Identify which rights-of-way and transmission lines are not proposed to be used for the project and explain why not.


Respectfully submitted,

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By:


W. Henry Graddy, IV

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was filed and copies have been duly served by first-class mail upon the following:

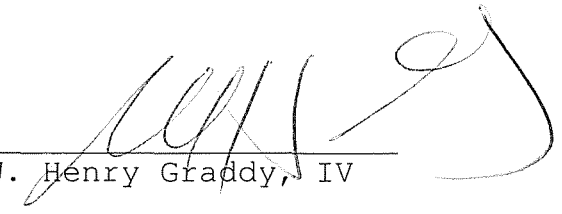
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This the 6 day of March, 2006.


W. Henry Graddy, IV