

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF KENTUCKY UTILITIES)	
COMPANY FOR A CERTIFICATE OF PUBLIC)	CASE NO.
CONVENIENCE AND NECESSITY FOR THE)	2010-00164
CONSTRUCTION OF TRANSMISSION)	
FACILITIES IN MCCRACKEN COUNTY,)	
KENTUCKY)	

FIRST INFORMATION REQUEST OF COMMISSION STAFF
TO KENTUCKY UTILITIES COMPANY

Kentucky Utilities Company ("KU"), pursuant to 807 KAR 5:001, is to file with the Commission the original and eight copies of the following information, with a copy to all parties of record. The information requested herein is due on or before January 14, 2011. Responses to requests for information 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.

KU shall make timely amendment to any prior response if it 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 KU fails or refuses to furnish all or part of the requested information, it 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.

1. Provide a one-line diagram for the transmission area surrounding the proposed line.

2. Provide the design and reliability criteria used for the transmission system power flow studies.

3. Provide the following information for the power flow scenarios studied:

- a. What season and year system models were used in the power flow studies?
- b. What area transfers were in place in these models?
- c. Discuss the sensitivity of the results of the studies to these transfers.

4. Provide the generation dispatch scenarios used at the Tennessee Valley Authority's ("TVA") Shawnee Steam and other electrically close generation plants in each case studied and discuss the sensitivity of the results of these studies to these transfers.

5. TVA recently announced plans to retire older fossil generating units including Unit 10 at Shawnee Steam Plant. Were the Shawnee Steam Plant and future

additional retirements considered in these analyses? If so, which units were considered and for what timeframe?

6. Provide a summary of the short-circuit analysis performed for the proposed new transmission line.

7. It is stated that, currently, only 125 MW of firm load can be provided to the Paducah Power System and the Princeton Electric Plant Board (collectively referred to by KU as the "Kentucky Municipal Power Agency") without the proposed system improvements. How much total load can be supplied to these two entities once the proposed line is in service?

8. What are the projected load growth rates (normal and extreme) for the Kentucky Municipal Power Agency?

9. Were the prior TVA developed load growth studies for the Kentucky Municipal Power Agency used for load forecasting or were new ones developed by KU or others?

10. Provide a brief description of the load forecasting processes used for the Kentucky Municipal Power Agency.

11. How will the proposed transmission line be terminated at the Department of Energy ("DOE") end?

12. How close will the nearest residential structure be to the new transmission line?

13. What alternative line designs such as single pole, vertical phase, etc. were considered to increase the distance to structures?

14. Provide the load levels studied at the DOE Gaseous Diffusion Plant for this project.

15. Provide a copy of the "2008-00004 Facility Study" associated with this project.

16. Refer to the direct testimony of Edwin Staton. At pages 2-3, he states that the proposed transmission line is needed to provide Network Integration Transmission Service to the Kentucky Municipal Power Agency.

a. Is the Kentucky Municipal Power Agency either a full-power requirements or a partial-power requirements customer of KU? If yes, explain in detail the annual quantities of power (demand and energy) sold by KU to the Kentucky Municipal Power Agency from 2008 through 2010, and provide a copy of each power sale contract.

b. Was the electric load (i.e. either demand, energy, or both) of the Kentucky Municipal Power Agency included in the load forecast set forth in KU's Integrated Resource Plan ("IRP") as filed with the Commission in 2008? If yes, indicate where in that IRP the load of the Kentucky Municipal Power Agency is shown.

17. KRS 278.020(1) prohibits KU from beginning the construction of any facility for furnishing to the public any of the services listed in KRS 278.010 until the Commission has certified that public convenience and necessity require the construction. Explain how KU's provision of transmission service to the Kentucky Municipal Power Agency constitutes utility service to or for the public as defined in KRS 278.010(3)(a).

18. KRS 278.030(2) provides, in pertinent part, that "[e]very utility shall furnish adequate, efficient and reasonable service" Is the transmission line proposed in this case needed by KU to meet its statutory obligation under KRS 278.030(2) to

provide adequate, efficient and reasonable service to the Kentucky Municipal Power Agency? If yes, explain in detail.


19. KRS 278.040(2) provides, in pertinent part, that “[t]he Commission shall have exclusive jurisdiction over the regulation of rates and service of utilities”

a. Is the transmission service provided by KU to the Kentucky Municipal Power Agency an activity regulated by this Commission, and is that transmission service subject to this Commission’s jurisdiction? If yes, explain in detail.

b. Does KU provide any service to the Kentucky Municipal Power Agency that is regulated by this Commission? If yes, explain in detail.

20. Explain why the transmission line proposed in this case to serve the Kentucky Municipal Power Agency is not a “nonregulated electric transmission line” as that term is defined in KRS 278.700(5).

21. Revise the map of the preferred route and include parcel identifiers on those parcels crossed by the proposed transmission line. Revise the list of property owners in Exhibit 7 to include the parcel identifiers with the corresponding property owner.



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DATED JAN 07 2011

cc: Parties of Record

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