

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF KENTUCKY POWER)	
COMPANY FOR: (1) AN ORDER DECLARING)	CASE NO.
AND CLARIFYING THE APPLICATION OF THE)	2014 -00479
INSPECTION REQUIREMENTS OF 807 KAR)	
5:006, SECTION 26(4), TO CERTAIN OF THE)	
COMPANY'S TRANSMISSION FACILITIES; OR)	
(2) IN THE ALTERNATIVE, AND TO THE)	
EXTENT REQUIRED, A DEVIATION IN PART)	
FROM THE INSPECTION REQUIREMENTS OF)	
807 KAR 5:006, SECTION 26(4), WITH)	
RESPECT TO THE COMPANY'S)	
TRANSMISSION FACILITIES; AND (3) ALL)	
OTHER REQUIRED APPROVALS AND RELIEF)	

COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
TO KENTUCKY POWER COMPANY

Kentucky Power Company ("Kentucky Power"), pursuant to 807 KAR 5:001, is to file with the Commission the original and ten copies of the following information, with a copy to all parties of record. The information requested herein is due within 14 days from the issuance of this request. 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.

Kentucky Power 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 Kentucky Power 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 should be given to copied material to ensure its legibility. 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 filing a document containing personal information, Kentucky Power shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the document so that personal information cannot be read.

1. Refer to Kentucky Power's Application, numbered paragraph 8. Kentucky Power states, "Approximately one-half of the Company's [ten miles of] 34.5 kV transmission lines are supported by structures constructed of wood; the balance of the 34.5 kV transmission lines are supported by structures constructed with metal lattice." In response to Commission Staff's First Request for Information ("Staff's First Request"), Item 1, Kentucky Power states, "Upon further review, the Company has determined there are approximately two miles of 34.5-kV line in the Company's service

territory functioning and classified as transmission facilities.” State the portion of Kentucky Power’s approximate two miles of 34.5-kV line that is supported by structures constructed of wood and the portion of the approximate two miles of 34.5-kV line that is supported by structures constructed with metal lattice.

2. Refer to Kentucky Power’s Application, numbered paragraph 12. Kentucky Power states, “It is presumed the Commission intended to change the regulation [807 KAR 5:006, Section 26(4)(e)] governing the inspection of electric lines operating at less than 69 kV by the addition of the language ‘to the point of service.’” Fully describe the inspection of the 46-kV and 34.5-kV lines for the three-year period prior to the amendments to 807 KAR 5:006 in 2013. State whether Kentucky Power changed or modified its inspection of these facilities as a result of the amendments in 2013. If so, identify the changes or modifications.

3. Refer to Kentucky Power’s Application, numbered paragraphs 13 through 16. Does Kentucky Power conduct any type of non-aerial inspection of its 34.5-kV or 46-kV electric facilities at intervals not exceeding six months? If so, describe the inspections and state the corresponding inspection schedule.

4. Refer to Kentucky Power’s response to Staff’s First Request, Item 7, page 19 of 28. Kentucky Power provides a table containing transmission line clearance guidelines. State whether Kentucky Power utilizes the guidelines listed on Table 3 for 69-kV transmission lines for its 34.5-kV and 46-kV lines. If not, provide, in a format similar to Table 3, the transmission line clearance guidelines for the 34.5-kV and 46-kV lines and explain the reason(s) for any difference.

5. Refer to Kentucky Power's response to Staff's First Request, Item 9. Kentucky Power states that there is one point of service on its "Armco-Bellefonte 34.5 kV" line. Explain why the Armco-Bellefonte 34.5-kV line should be considered a transmission facility rather than a distribution facility and why a ground inspection to the point of service at an interval not to exceed two years is not necessary.

6. Refer to Kentucky Power's response to Staff's First Request, Item 5. For the 34.5-kV facilities that were not constructed or have not been rebuilt to 69-kV construction standards, explain why these facilities should be treated, for purposes of 807 KAR 5:006, Section 26(4), in a manner similar to the treatment of electric facilities operating at 69-kV or greater.

7. Refer to Kentucky Power's response to Staff's First Request, Item 6. For the 46-kV facilities that were not constructed or have not been rebuilt to 69-kV construction standards, explain why these facilities should be treated, for purposes of 807 KAR 5:006, Section 26(4), in a manner similar to the treatment of electric facilities operating at 69 kV or greater.

8. In its response to Staff's First Request, Item 1, Kentucky Power revised the amount of 34.5-kV line from ten miles down to approximately two miles. Does the revision change or modify Kentucky Power's request, made in the alternative, for a deviation?

9. Refer to Kentucky Power's Application, numbered paragraph 12. Kentucky Power states, "Transmission lines, including the Company's 34.5 kV and 46 kV transmission lines, run from station to station and do not directly serve customers. They have no "point of service" for transmission lines" (paragraph 12(a)). Kentucky

Power then indicates further that “transmission lines lack a point-of-service” (paragraph 12(b)). Fully discuss how these statements may be reconciled with Kentucky Power’s response to Commission Staff’s First Request, Item No. 9, in which Kentucky Power identified four electric-service arrangements that directly utilize electricity from 34.5-kV and 46-kV transmission lines.

a. Explain how these electric service arrangements are classified (i.e., whether they are treated as distribution or transmission) for inspection purposes, and describe the inspections performed the corresponding inspection schedules for each electric-service arrangement.

b. Are the lengths of the facilities supplying these electric-service arrangements included in the overall transmission-line lengths identified in the Application?

c. What aspect of the electric-service arrangements constitutes the demarcation point between Kentucky Power’s facilities and that of the customer, and what is the distance of each electric service arrangement to this point?

10. Refer to Kentucky Power’s Application, numbered paragraph 17.

a. Describe the nature and extent of damage and deterioration of supporting facilities that may be inspected from the air and explain how these conditions are detected.

b. If any damage or deterioration of a supporting facility is identified from the air, explain the process for documenting and reporting such conditions and describe the follow-up activities that would occur to ensure that adequate corrective action is taken. Provide documentation of an example demonstrating this process.

c. Are there any portions of Kentucky Power's transmission system, including electric lines below 69-kV as identified in this proceeding, which cannot be effectively inspected by air? If so, explain the nature and extent of inspections of supporting facilities that occurs to comply with 807 KAR 5:006, Section 26(4)(b)(2).

11. Refer to Kentucky Power's response to Commission Staff's First Request for Information, Item 5. For the following classes of facilities:

- a. Existing 34.5-kV lines identified in this proceeding.
- b. New/Rebuilt 34.5-kV lines identified in this proceeding.
- c. Existing 46-kV lines identified in this proceeding.
- d. New/Rebuilt 46-kV lines identified in this proceeding.
- e. Existing 69-kV and above lines identified in this proceeding.
- f. New/Rebuilt 69-kV and above lines identified in this proceeding.

(1) Describe the zone (Zone 1 – Heavy or Zone 2 – Medium) identified in the National Electrical Safety Code ("NESC") (Rule 230B) utilized for ice and wind loading clearances for the design and construction of each of the class of facilities above.

(2) Refer to Kentucky Public Service Commission's Ike and Ice Report, dated November 19, 2009, at page 82. Kentucky Power was identified as one of the jurisdictional utilities with transmission facilities of which most have decided to build 69-kV and above transmission lines to meet the heavy loading requirements. In light of this information, describe in detail Kentucky Power's design and construction practices with regard to each class of facility identified above and fully explain the reason for any differences.

(3) Explain any additional design considerations that are typically incorporated or may be considered as added safety factors when applying the NESC construction standards for each class of facility identified above.



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

DATED **JUN 03 2015**

cc: Parties of Record

*Kentucky Power Company
101 A Enterprise Drive
P. O. Box 5190
Frankfort, KY 40602

*Honorable Mark R Overstreet
Attorney at Law
Stites & Harbison
421 West Main Street
P. O. Box 634
Frankfort, KENTUCKY 40602-0634