

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF KENTUCKY	)	
POWER COMPANY FOR A CERTIFICATE OF	)	
PUBLIC CONVENIENCE AND NECESSITY TO	)	
CONSTRUCT A 138 KV TRANSMISSION LINE	)	CASE NO.
AND ASSOCIATED FACILITIES IN BREATHITT,	)	2021-00346
FLOYD AND KNOTT COUNTIES, KENTUCKY	)	
(GARRETT AREA IMPROVEMENTS 138 KV	)	
TRANSMISSION PROJECT)	)	

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

Kentucky Power Company (Kentucky Power), pursuant to 807 KAR 5:001, is to file with the Commission an electronic version of the following information. The information requested is due on December 7, 2021. The Commission directs Kentucky Power to the Commission's July 22, 2021 Order in Case No. 2020-00085<sup>1</sup> regarding filings with the Commission. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the question to which the response is made, and 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

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<sup>1</sup> Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC July 22, 2021), Order (in which the Commission ordered that for case filings made on and after March 16, 2020, filers are NOT required to file the original physical copies of the filings required by 807 KAR 5:001, Section 8).

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 Kentucky Power obtains information that indicates 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, Kentucky Power 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. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, Kentucky Power shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to the Application, generally.
  - a. Provide a copy of the PJM RTEP analysis results showing the contingency and double contingency problems that will be alleviated by the transmission line and substation upgrades. Include in the response whether there were any alternate solutions evaluated but not selected as a cost-effective solution.

b. Explain whether the projects were at some point considered as separate or in smaller bundles in the RTEP process, and then combined into the proposed bundle as presented in the Application.

2. Refer to the Application, page 6, paragraph 16. Explain whether an environmental impact assessment is required or has been completed for the proposed line. If so, provide a copy of the assessment.

3. Refer to the Application, generally. Explain what will happen to the material that is retired.

4. Refer to the Application, page 7, paragraph 22. Explain whether the 4.131-acre tract has already been acquired.

5. Refer to the Application, page 11, paragraph 40.

a. Explain what is meant by the following statement: "Kentucky Power projects the Company's share of the annual operating cost will be approximately \$96,400."

b. Explain what other entities will share in the operating costs of the project and state the total annual operating cost.

6. Refer to the Application, page 11, paragraph 41. Explain whether the 4.373-acre tract has already been acquired.

7. Refer to the Direct Testimony of George T. Reese (Reese Testimony), page 26, lines 1–5. Provide the bat portal studies conducted relative to the expansion of the Garrett Substation.

8. Refer to the Direct Testimony of Nicholas C. Koehler (Koehler Testimony), page 10, lines 11–21.

a. Provide the inspection reports that indicate 142 open conditions have been observed along the Beaver Creek-McKinney 46 kV #1 Circuit.

b. Provide the final reports of all investigations conducted by Kentucky Power in relation to the 36 momentary and 6 permanent outages that occurred on the Beaver Creek-McKinney 46 kV #1 Circuit in the last five years.

9. Refer to the Koehler Testimony, page 11, lines 1-4, and page 13, lines 4-9.

a. Explain why looping is preferred over radial feed.

b. Explain how providing looped service to radially fed customers improves service to customers.

c. Explain how many radially fed customers will be provided looped service under Kentucky Power's proposal.

d. Explain how Kentucky Power determines whether looping or radial feed is appropriate for a given line.

e. Explain why the 8.25-mile-long radial line out of Morgan Fork Station was not constructed using looping.

10. Refer to the Application page 17, paragraph 67.

a. Provide support for the statement that the operation and maintenance (O&M) costs associated with the Beaver Creek-McKinney 46 kV #1 Circuit are higher than the O&M costs with a comparable 138 kV transmission line.

b. Compare the required frequency of inspection for the Beaver Creek-McKinney 46 kV #1 Circuit to the required frequency of the 138 kV line proposed to replace it in this proposal.

11. Refer to the Application, page 12, paragraphs 43 and 44.

a. State how wide Kentucky Power expects a widened right-of-way to be.

b. State what methodology Kentucky Power will use to determine when a widened right-of-way is appropriate.

12. Refer to Reese Testimony, page 8, lines 17–22. The following projects with the same methodology for identifying and evaluating alternative routes are referenced: Hays Branch-Morgan Fork (Case No. 2007-00155), Bonnyman-Soft Shell (Case No. 2011-00295), Hazard-Wooton (Case No. 2017-00328), East Park (Case No. 2018-00072), Leeco (Case No. 2009-00235) and Kewanee-Enterprise Park (Case No. 2020-00062).

a. State the width of the right-of-way for each project and how much authority was given to Kentucky Power to move the centerline and right-of-way within the Filing Corridor.

b. Explain any differences with the present Case No. 2021-00346.

13. Refer to the Application, Exhibit 3. There are several parcels with the Map ID of 027, 172, and 149 in Knott County and the owners are not on the list in Exhibit 15. State the owners of these parcels.



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DATED NOV 29 2021

cc: Parties of Record

Case No. 2021-00346

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