

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 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 an electronic version of the following information. The information requested is due on December 28, 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

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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).

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 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, Exhibit 20, generally. Provide cost estimates for each of the eliminated alternatives included in the Siting Study.
2. Refer to the Application, Exhibit 16, page 1 of 3; Exhibit 20, Attachment H; and Nicholas C. Koehler Direct Testimony (Koehler Testimony) pages 13–15.

a. Explain why the proposed Eastern Substation does not represent a duplication of resources in the sense that the equipment and upgrades proposed for the Eastern Substation could be installed at the existing Hays Branch substation.

b. Explain the need and reasons for constructing a double circuit between the proposed Eastern Substation and the Hays Branch Substation as opposed to a single circuit.

c. Explain what, if any, are the future plans of the Eastern Substation, except for providing another feed from the Garrett Substation into the Hays Branch Substation via the proposed Eastern Substation.

3. Refer to the Koehler Testimony, page 13 lines 18–21 and Application, Exhibit 20, page 19 of 112. Explain why the proposed greenfield line from the Saltlick Substation to the Garrett Substation does not follow the existing right-of-way for the to-be-retired Spring Fork Tap line.

4. In Kentucky Power's recent CPCN Case No. 2020-00062,<sup>2</sup> the PJM Regional Transmission Expansion Process (RTEP) identified both Baseline thermal and voltage Criteria violations with the existing 46 kV subtransmission network that would be alleviated through that proposed project. Confirm that there are no thermal or voltage criteria violations associated with the current 46 kV sub transmission network or associated with the current subject 138 kV network that will be alleviated by the current proposed project. If there are any thermal or voltage violations, explain how each one will be alleviated through the proposed project.

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<sup>2</sup> See generally *Electronic Application of Kentucky Power Company for a Certificate of Public Convenience and Necessity to Construct a 138 KV Transmission Line and Associated facilities in Pike and Floyd Counties, Kentucky*, (filed Sept. 3, 2020).

5. Refer to the Koehler Testimony, page 10, lines 5–21.
  - a. Provide a more detailed explanation of the various outages broken out by year for the various segments of the 46 kV subtransmission line that is to be retired for the last five years.
  - b. Provide the reliability indices annually for the current and last five years associated with the 46 kV circuit that is to be retired.
  - c. Explain whether and how the retirement of the 46 kV circuit affects the Salt Lick Substation.
  - d. Explain whether the 142 open conditions identified through inspections have all been identified in the last year or whether they have been open/ongoing from previous inspections.
  - e. Explain whether the 142 open conditions pertain to the entirety of the 46 kV line that will be retired. If not, explain the number of open conditions that exist for the remainder of the 46 kV line not discussed on page 10.
6. Refer to the Koehler Testimony, page 12, lines 5–14.
  - a. Explain and illustrate where the Spring Fork Substation is located, who owns it, and what transmission lines are connected to it.
  - b. Explain who owns the Salt Lick Substation and whether the Spring Fork Tap line is connected to it.
  - c. Refer also to the Application, Exhibit 20, Attachment H, page 25 of 112. Explain whether there are any East Kentucky Power Company transmission lines that would appear, if they were to be added to the maps on pages 21 and 25. If so, provide updated maps,

7. Refer to the Application, Exhibit 20, Attachment H, pages 21 and the Koehler Testimony, page 13, lines 4–9.

a. Explain the identified needs associated with the Beaver Creek-McKinney #1 circuit.

b. Explain whether the Beaver Creek-McKinney line depicted on page 21 has more than one circuit.

8. Refer to the Application, Exhibit 20, Attachment H, pages 21 and 25 of 112.

a. To the extent that the McKinney-Garrett 46 kV line and the Beaver Creek-Garrett 46 kV line are retired, explain how any customer served off of those two lines will be served.

b. Explain whether there are any customers served by the Spring Fork Tap from the Salt Lick Substation to the end of the Tap. If so, explain how these customers will be served.

c. Confirm that line segments 28, 26, 24, and 22 represent the preferred route for the new 138 kV line between Soft Shell and Salt Lick Substations.

d. Once these line segments are constructed, explain whether there will be two circuits emanating from Soft Shell Substation, the new line and the existing Soft Shell Extension.

e. Explain whether the new line will provide a second connection point to the Beaver Creek-Harbert–Spicewood line.

f. Explain why the new line could not begin at the Beaver Creek-Harbert–Spicewood line and then extend on to the Salt Lick Substation.

g. Line segment 28 parallels Highway 80 E part way. Explain why the new line could not follow the highway up to the point where it intersects line segment 26 and then proceed on the preferred path from there.

9. Refer to the Koehler Testimony at 13, lines 18–21 and the Application, Exhibit 20, Attachment H, page 25 of 112. Explain what and where on the map is the location of Snag Fork.

10. Refer to the Application, Exhibit 20, Attachment H, pages 21 and 24 of 112.

a. Confirm that the line segments 18 and 14 represent the preferred route for connecting the Salt Lick and Garrett Substations.

b. Explain why it is less expensive or preferable to construct a greenfield line (segments 18 and 14) rather than build the new line on existing Spring Fork Tap right-of-way.

c. Refer also to the Koehler Testimony, page 10. It is not clear from either of the maps or the description how the Spring Fork Tap relates to the Beaver Creek-McKinney 46 kV circuit. Explain whether the Spring Fork Tap line is included in the reference to Beaver Creek-McKinney 46 kV circuit.

11. Refer to Refer to the Application, Exhibit 20, Attachment H, pages 21–25 of 112 and Koehler Testimony, pages 13–15. The 12 project components descriptions of lines, switching stations or substations on pages 13–15 either do not appear or if they are on the maps, do not appear as described on the map on page 21 or on pages 22–25 provide an updated map which matches exactly the description of all 12 project components on pages 13–15.

12. Refer to Kentucky Power's response to Staff's First Request for Information (Staff's First Request), Items 11 and 12.

a. State whether Kentucky Power has ever had to reopen Commission proceedings in any of the cases provided in the response for the purpose of amending the granted authority to construct a transmission line, when later developments during construction necessitated moving it.

b. State whether Kentucky Power anticipates widening the right-of-way from 100 feet in any part of the proposed project. All of the maps submitted show a 100 foot right-of-way. If there is any part of the project that needs a wider right-of-way, submit new maps for Exhibit 3B.

c. State where along the proposed route mining affects the engineering design and right-of-way width?

13. Refer to the map filed by Western Pocahontas Properties on December 7, 2021, showing an alternative route through their property.

a. State on what maps in Exhibit 3A and Exhibit 3B this area is located.

b. State on what maps in Exhibit 4A and Exhibit 4B this area is located.

c. State on what maps in Exhibit 20 this area is located.

d. State whether the route proposed by Western Pocahontas Properties was along one of the alternative routes considered in Exhibit 20. If so, name the alternative and describe why it was not chosen.

e. If the route proposed by Western Pocahontas Properties was not considered as an alternative route, state why it was not considered.

f. State whether the route proposed by Western Pocahontas Properties involves fewer property owners than the route chosen by Kentucky Power.

g. If the route proposed by Western Pocahontas Properties involves fewer property owners, explain why it is not preferable to the route Kentucky Power proposes.

14. Refer to Kentucky Power's response to Western Pocahontas Properties' December 7, 2021 motion.

a. Provide the individual or individuals representing Western Pocahontas Properties with whom Kentucky Power has discussed the proposed route.

b. Provide the date on which the first discussion occurred and the date on which the most recent discussion occurred.



Linda C. Bridwell, PE  
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Public Service Commission  
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DATED DEC 15 2021

cc: Parties of Record



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