

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)	CASE NO.
CONSTRUCT 69 KV TRANSMISSION LINES)	2022-00236
AND ASSOCIATED FACILITIES IN PIKE)	
COUNTY, KENTUCKY)	

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 October 7, 2022. The Commission directs Kentucky Power to the Commission's July 22, 2021 Order in Case No. 2020-00085¹ 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

¹ 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, page 1. Explain whether there is an active case in West Virginia before the West Virginia Public Service Commission regarding that portion of the Stone-Sprigg 46 kV line located in West Virginia. If so, provide a link to the case and a corresponding timeline for the case. If not, explain whether a case will or will not be opened, including a timeline for the case. If a case will not be opened, explain why not.

2. Refer to the Application, Exhibit 10 for Belfry Area Transmission Line Project, Section 4, page 5. Provide a copy of all landowner and stakeholder comments received and explain the extent to which specific actions were taken as a result.

3. Refer to Exhibit 10. Section 4.0 “Alternate Route Comparison” discusses a specific landowner in the vicinity of New Camp Substation whose property cannot be avoided.

a. If not provided above, provide a copy of the landowner’s comments, or if not written, provide a summary of any verbal comments. Explain Kentucky Power’s continuing efforts to accommodate (if possible) the landowner’s concerns.

b. If provided above, identify the comments received from this particular landowner and provide an update on the efforts to accommodate the landowner’s concerns.

4. Refer to the Application, Exhibit 10, Attachment C, Map 3 Alternative Routes, page 47 of 92; and Attachment H, Sheet 9 of 12, page 89. Map 3 shows a cemetery very close to the line entering the proposed Orinoco substation from the north. Confirm that the map on Sheet 9 of 12 and Map 3 depict the same cemetery location.

5. Refer to the Application, Exhibit 10, Attachment C, Map 4, page 48 of 92 and Attachment H, pages 81–92. Provide an update to the maps showing the placement of towers along the proposed route and the areas where Kentucky Power believes that it may be necessary to move the centerline 200 feet in any direction in order to avoid an obstacle.

6. Refer to the Application, Exhibit 10, page 12 of 92. Kentucky Power states Alternative Route D would require it to enter the Stone Substation on the south side. Explain why this is considered to be less desirable by the engineering team.

7. Refer to the Application, Exhibit 10, page 12 of 92. Explain whether the distribution lines along the Orinoco-Stone Project Component necessitate a northern orientation, and if so, why.

8. Refer to the Application, Exhibit 10, page 12 of 92. Kentucky Power states that Alternative Route D is susceptible to outage constraints during its construction timeline. Explain how and why potential outage constraints exist and provide all applicable supporting documentation.

9. Refer to the Application, Exhibit 10, page 16 of 92. Kentucky Power states that there is one residence within 100 feet of the centerline for Alternate Route B for the New Camp Orinoco route and one residence within 100 feet of the centerline for Alternate Route D. Identify on a map where these two residences are located and include the proposed route on said map.

10. Provide an explanation for choosing to retire certain portions of the 46 kV line from an engineering and reliability perspective. Please reference both the preferred routes and the alternatives in this explanation as well as duplication or cost considerations.

11. Refer to the Application, page 12. Provide a chart containing a cost breakdown of each route including both the preferred route and the alternative route, including the categories as broken down at the bottom of page 12.

12. Refer to the Direct Testimony of Brian West (West Testimony), page 9, line 4. Explain what the North American Electric Reliability Council (NERC) Right-Of-Way (ROW) requirement is for both 46 kV transmission lines and 69 kV transmission lines.

13. Refer to the West Testimony, page 9, lines 6–16. Explain what conductor blowout requirements are and how they impact ROW requirements.

14. State whether the spans identified in the West Testimony, page 9, lines 8–16 are more subject to, or at risk for, conductor blowout issues than other spans of transmission line in the proposed project.

15. Refer to the Direct Testimony of George T Reese (Reese Testimony), page 5–6. Further explain why expanding the existing Belfry Substation in its current location is not possible, and why doing so would require the purchase of three residences.

16. Compare the estimated cost of constructing the proposed Orinoco Substation at the location that was selected to the estimated cost of constructing the proposed substation at each of the alternative locations considered. Provide any supporting documentation or cost breakdown for each option.

17. Refer to the Reese Testimony, page 15, lines 4–5. Provide a copy of the letter and fact sheet provided in the August 26, 2021 packet mailing and explain whether any additional information was handed out at the public meetings. If so, provide copies of that additional information.

18. Refer to the Reese Testimony, page 15, lines 20–22; and page 16, lines 1–2; and page 21, lines 20–22. Also, refer to the West Testimony, page 7, lines 20–21; and page 8, lines 1-16. Explain whether any landowner who may be affected by the movement of the center line in any direction was notified of the possibility that the

centerline and associated ROW could shift up to 200 feet in any direction from the selected location in the landowner notifications or public meetings prior to the filing of this proceeding. If not, explain why not.

19. Refer to the Reese Testimony, page 17, lines 1–4. Explain why the two Study Segments were eliminated.

20. Refer to the Reese Testimony, page 22, lines 3–11. If the proposed ROW is approved as proposed and if there were to be another landslide along the route, explain whether the line would be impacted. If so, explain why Kentucky Power would not move the centerline and ROW further away from the danger initially in the application.

21. Refer to the Reese Testimony, page 22, lines 11–13.

a. Explain what the required in-service date is and how it was decided and set.

b. Explain the ramifications of not meeting the required in-service date. For example, is there a NERC safety regulation or PJM requirement that mandates that the required in-service date be met.

22. Refer to the Direct Testimony of Nicolas C. Koehler (Koehler Testimony), page 10, lines 21–23; and page 11, lines 1–10.

a. Explain the date of the last two inspections of the Sprigg-Stone 46 kV circuit.

b. Explain how many of the current open conditions were found at each of the last two Sprigg-Stone 46 kV circuit inspections.

c. Provide a list of the open conditions that were repaired at each of the last two Sprigg-Stone 46 kV circuit inspections.

23. Refer to the Koehler Testimony, page 11, lines 11–14. Explain whether the voltage drop violations identified at the New Camp 69 kV substation in the event of an N-1-1 scenario involving the loss of the 138/69 kV transformer at Johns Creek and loss of the Inez-Sprigg 138 kV line were the only violations identified that would be alleviated with the proposed project. If not, explain what other violations will be alleviated.

24. Refer to the Kohler Testimony, page 11, lines 15–20. State whether the voltage drop violations occurred prior to the addition of the loads of Cyber Innovation Group LLC (Cyber Innovation) and Discover AI LLC (Discover AI).

25. Provide the available capacity of Kentucky Power’s transmission facilities located in the area referred to in the Application as the “Belfry Area” prior to the addition of the loads of Cyber Innovation and Discover AI.

26. Provide the current available capacity of Kentucky Power’s transmission facilities in the Belfry Area.

27. Provide the expected available capacity in the Belfry Area once the proposed project is complete.

28. Refer to the Direct Testimony of Nicolas Koehler (Koehler Testimony), pages 14 and 15. Provide the estimated cost of constructing the electrical alternatives to the proposed project that were evaluated by Kentucky Power.

29. Refer to the Koehler Testimony, page 11, lines 20-23. Confirm that the Hatfield substation is located where the Hatfield-Inez 138 kV circuit intersects the Hatfield-Williamson 69 kV circuit. If not, provide an updated map showing the correct location.

30. Refer to the Koehler Testimony, page 14, lines 17–18.

a. Explain why the Turkey Creek Tap is being retired.

b. Explain whether the ROW for both the Turkey Creek Tap and the Stone-Sprigg 46 kV circuit is being retained or relinquished.

31. Refer to the Koehler Testimony, page 15, lines 8 and 9. Explain the outage and terrain constraints that limit the ability to rebuild fully within the existing ROW. Identify all areas in which greenfield construction has been chosen instead of building within the existing ROW and provide the reasons for the decision

32. Refer to the Application, Exhibit 10. For the areas identified as areas where greenfield construction has been chosen, provide the cost difference of building in the existing ROW as compared to greenfield construction.

33. Provide documentation regarding the specific voltage violations, including locations, frequencies and any charts documenting the PJM violations.

34. Explain if the recent flooding in Eastern Kentucky affected the proposed route in this matter. If not, explain whether Kentucky Power² considered making any additional changes to this project based on the damage caused by the recent flooding.

35. Explain whether Kentucky Power considered updating its Siting Study to include additional or new factors based on the destruction and information learned from the recent Eastern Kentucky flooding. If not, explain why.

36. Refer to the Application, Exhibit 10, Attachment H, page 80 of 92. Currently, the Stone-Sprigg 46 kV line and the Sprigg-Beaver Creek 138 kV circuit both connect substations located in Kentucky and West Virginia. Other than monitoring the energy flows and load in order to maintain the operational integrity of the transmission system,

² Case No. 2022-00293, *Electronic Application of Kentucky Power Company for an Order Approving Accounting Practices to Establish a Regulatory Asset Related to the Extraordinary Expenses Incurred in Connection with June 2022 and July 2022 Major Storm Events* (Ky. PSC Aug. 30, 2022).

explain whether the energy flows between the substations represent specific transactions between Kentucky Power and Appalachian Power, both affiliates of AEP. If so, explain how each transaction is determined.

37. Refer to the Application, Exhibit 10, Map 3, page 47. In reference to the Stone-Sprigg (KY) 46 kV transmission line and the Sprigg-Beaver Creek (KY) 138 kV transmission line, provide the following information:

a. An explanation as to how the energy flows and operational loads are measured and attributed to Kentucky Power and Appalachian Power.

b. A detailed analysis of how the energy cost is attributed to Kentucky Power or Appalachian Power for purposes of ratemaking.

c. Explain how line losses are calculated on transmission lines connecting substations belonging to Kentucky Power and the other individual state(s).

38. State whether AEP Kentucky Transmission Company (Kentucky Transco) owns or operates any transmission lines in Kentucky.

39. If Liberty Utilities Company consummates its purchase of Kentucky Power, explain whether the current arrangement in the assignment of costs between AEP affiliates for 46 kV, 69 kV, 138 kV, or 161 kV transmission lines that connect to substations in both Kentucky and another state will change. If so, provide a detailed explanation of how the assignment of costs will change.



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DATED SEP 22 2022

cc: Parties of Record

Case No. 2022-00236

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