

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 THIRD 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 November 22, 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 person supervising the preparation of the response on behalf of the entity that 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).

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 Kentucky Power's response to Commission Staff's Second Request for Information (Staff's Second Request), Item 1. The topographical maps in Exhibit 4 do not provide the same level of detail as the maps in Exhibit 10.

- a. Provide the siting study map of the proposed transmission route, included on pages 81 through 92 of Exhibit 10 to the Application, with the parcel numbers from Exhibit 12 to the Application used to identify any relevant parcels shown in the siting study map and showing the location of the 400-foot Filing Area.

b. Explain why there are more parcels shown on the siting study map than on the map provided as Exhibit 4 to the Application.

2. Refer to Kentucky Power's response to Staff's Second Request for Information, Item 1. Explain why the right of way (ROW) for Parcel 43 will need to be 360 feet.

3. Refer to Kentucky Power's response to Staff's Second Request, Item 9. For each encroachment:

a. Provide a map(s) of the corresponding parcel depicting each building encroachment with a scale as well as measurements depicting the encroachment into the ROW and identifying the parcel using the parcel number from Exhibit 12 to the Application, if applicable.

b. Provide the date each encroachment was discovered.

c. Provide the date of the inspection, either in person or aerial, of that area prior to the encroachment being discovered.

d. Describe Kentucky Power's actions upon discovering the encroachment in each instance.

4. Refer to Kentucky Power's response to Staff's Second Request, Item 9e, which appears to indicate that Alternate Route D is still being considered. Clarify whether the utility views the proposed route and Alternate Route D as both viable options for construction.

5. Provide the known number of buildings or other structures currently encroaching Kentucky Power transmission ROWs.

6. Explain whether a structure encroaching in a transmission line ROW is a violation of NERC reliability standards.

7. Explain whether the same Kentucky Power personnel who inspect distribution lines, especially in urban areas, also inspect transmission lines. If not, explain whether personnel who inspect distribution lines in urban areas look over nearby transmission line facilities in order to proactively identify and report problem areas.

8. Explain whether a developer or property owner is required to contact Kentucky Power prior to constructing a building or anything else that could encroach on a transmission line ROW. If so, explain whether and by what means Kentucky Power has the authority to require the proposed structure to be moved out of the encroachment area.

9. Explain whether Kentucky Power has ever required the removal of or purchased an existing structure found to be encroaching in a transmission line ROW.

10. Describe the steps Kentucky Power has taken to prevent future encroachments into Kentucky Power's ROWs.



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DATED NOV 09 2022

cc: Parties of Record

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