

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	)	2023-00040
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, shall file with the Commission an electronic version of the following information. The information requested is due on July 12, 2023. 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 person supervising the preparation of the response on behalf of the entity that 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).

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 or incomplete when made or, though correct or complete when made, is now incorrect or incomplete 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 and scanned 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 12, Customer Notice, page 4 of 4. Also refer to the Application, Exhibit 22. In addition to the proposed transmission line project, provide an updated map showing all the transmission lines and substations referenced in the Alternative Solutions 1 and 2.

2. Refer to the Application, Exhibit 22.

a. Provide a comparison of the project components in Alternative Solutions 1 and 2 to the two Alternative Solutions provided in Case No. 2022-00236.<sup>2</sup> Include in the comparison the estimated cost of each project component.

b. In the present proceeding, for each Alternative Solution project component not included as part of the Alternative Solutions in Case No. 2022-00236, explain why the project was not included previously.

c. In the present proceeding, for each Alternative Solution project component not included as part of the Alternative Solutions in Case No. 2022-00236, explain whether the separate project components were already in Kentucky Power's construction work plan when Case No 2022-00236 was filed.

3. Refer to the Application, Exhibit 22. If one of the Alternative Solutions were to be constructed in lieu of the proposed project and the Belfry substation is not retired, explain whether the Belfry substation would need to be retired and replaced by the Orinoco substation at a later date. Include in the response the proposed date the Belfry substation would be retired.

4. Explain whether and to what extent either of the alternative solutions would remedy the specific issues being addressed by this project.

5. Refer to the Direct Testimony of Nicholas Koehler, page 19, lines 10–13 and line 23. Also refer to the Application, Exhibit 22. Provide supporting calculations and documentation for the allegation that the cost of Alternatives 1 and 2 is \$15 million more than the proposed project.

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<sup>2</sup> Case No. 2022-00236, *Electronic Application of Kentucky Power Company for a Certificate of Public Convenience and Necessity to Construct 69 KV Transmission Lines and Associated Facilities in Pike County, Kentucky* (filed Sept. 8, 2022).

6. Refer to the Direct Testimony of George Reese . Define “conductor sway” and describe how it factors into Kentucky Power’s siting study.

7. Explain the difference in the meanings of “conductor blow-out” and “conductor sway” in terms of how Kentucky Power has used them in this Application.

8. Refer to Case No. 2022-00236, Kentucky Power’s response to Staff’s First Request for Information (Staff’s First Request), Item 11. Provide an updated chart containing a cost breakdown of each route including both the preferred route and the alternative route.

9. Refer to Case No. 2022-00236, Kentucky Power’s response to Staff’s First Request, Item 28. Explain whether there are any changes in the estimated \$32.1 million supplemental alternative and \$0.37 baseline alternative transmission costs.

10. Refer to Case No. 2022-00236, January 5, 2023 Order. Provide a detailed explanation and analysis of how the 69 kV transmission line and substation upgrades proposed in this application do not result in wasteful duplication. In the response, specifically address how the proposed project would not result in an excess of capacity over need or excessive investment in relation to productivity or efficiency.

11. Explain whether Kentucky Power considered any other alternate solutions other than those discussed in the Application.



Linda C. Bridwell, PE  
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DATED         JUN 23 2023        

cc: Parties of Record

Case No. 2023-00040

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