

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION  
CASE NO. 2005-00154

RECEIVED

JUL 19 2005

PUBLIC SERVICE  
COMMISSION

IN THE MATTER OF:

KENTUCKY UTILITIES, COMPANY

APPLICANT

and

CONCERNED CITIZENS AGAINST THE TRANSMISSION LINE

INTERVENOR

**REQUEST FOR CLARIFICATION OF KU'S RESPONSES TO DATA REQUESTS  
FROM CONCERNED CITIZENS AGAINST POWER LINE EXTENSION**

Come the Intervenors, Concerned Citizens Against The Power Line Extension ("Citizens"), and seek clarification from the Applicant, Kentucky Utilities Company ("KU") of its following Responses to the Citizens' Data Requests and Requests for Production of Documents, as set forth below:

1. Clarification on Response to Question No. 1 and Question No. 2

What does KU mean "the topography of the transmission system in the area limits construction alternatives to the proposed Tyrone to West Frankfort 138 kilovolt? Please explain and describe in detail.

Explain the discrepancy in the answer to Question No. 1 that "no cost analyses were performed" and the statement on page 2 (Mullins) of the attachment to Question No. 2 that "a thorough cost analysis was performed on each alternative." Identify whether those costs analysis referred to have been produced.

2. Clarification on Response to Question No. 3

Explain the statement "during the rebuilding of either 138 kilovolt line, the City of Frankfort would be vulnerable to an outage of either one of the two remaining 138 kilovolt

lines.” Describe what you mean by “outage” in terms of duration, frequency, impact and number of homes affected.

3. Clarification on Response to Question No. 5

Is the EPRI analysis and report the same as the photo science process?

4. Clarification on Response to Question No. 8

KU has responded to the first part of Question No. 8 but appears to have overlooked the second part which asks KU to “describe any operating problems it would incur if this proposed transmission line is not operational.”

5. Clarification on Response to Question No. 8

How did KU determine that the property values set forth in response to this question should be set at 30 percent of the fair market value of Property Valuation Administrator’s assessment?

6. Clarification on Response to Question No. 16

What company serves the BFI line and is KU stating it has absolutely no knowledge of that line’s site and capacity?

7. Clarification on Response to Question No. 17

What does “contingency overload” mean and how is it identified?

8. Clarification on Response to Question No. 18

Is this line’s purpose only to alleviate expected overloads or is it part of delivery system of new power; and if so, to whom is the power being delivered? Furthermore, what contingencies other than contingencies of extra high voltage are being referred to in this Answer?

9. Clarification on Response to Question No. 19

Why is it overly burdensome to provide documents showing the existing rights of way owned by KU in Frankfort, Anderson or Woodford Counties?

10. Clarification on Response to Question No. 24

By referring to Response No. 17, does this answer mean that KU is not operating at peak capacity? Additionally, please state how many hours a year the current system operates at peak capacity.

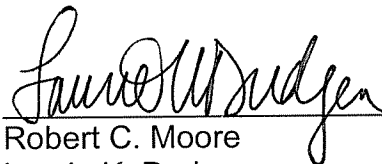
11. Clarification on Response to Question No. 25

Can only a 138 kilovolt line be built between two stations with 138 kilovolt busses?

12. Clarification on Response to Question No. 28

Please state in the affirmative or negative whether KU or any of its employees have notes from the 1/13/05 meeting at PSC or the 4/26/05 Anderson County meeting with the citizens.

Respectfully submitted,



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**CERTIFICATE OF SERVICE AND FILING**

Undersigned counsel certifies that an original and ten photocopies of this Request for Clarification were served and filed by hand delivery upon Elizabeth O'Donnell, Executive

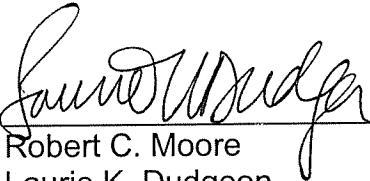
Director, Kentucky Public Service Commission, 211 Sower Boulevard, Frankfort, Kentucky 40601; furthermore, it was served by mailing a true and correct copy of the same, first class postage prepaid to the following counsel for Kentucky Utilities Company, by first class mail, postage prepaid, as follows:

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All on this the 19<sup>th</sup> day of July, 2005.

  
Robert C. Moore  
Laurie K. Dudgeon