

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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PUBLIC SERVICE
COMMISSION

IN THE MATTER OF:

APPLICATION OF EAST KENTUCKY)
POWER COOPERATIVE FOR A CERTIFICATE OF) CASE NO.
PUBLIC CONVENIENCE AND NECESSITY FOR) 2005-00207
CONSTRUCTION OF TRANSMISSION FACILITIES)
IN BARREN, WARREN, BUTLER, AND OHIO)
COUNTIES, KENTUCKY)

SECOND DATA REQUEST TO EAST KENTUCKY POWER COOPERATIVE
BY INTERVENORS CARROLL AND DORIS TICHENOR

Intervenors Carroll and Doris Tichenor request that East Kentucky Power Cooperative ("EKPC") file with the Kentucky Public Service Commission the following information, with a copy to all parties of record.

1. Please provide any and all documents which form the basis of the estimate of the total costs of acquiring all rights-of-way necessary for construction of the transmission line project as currently proposed.

2. Please identify the total costs, per mile, of acquiring all rights-of-way necessary for construction of the transmission line project as it is currently proposed, discretely identified and classified by transmission line segment. For example, identify the total cost for acquisition of rights-of way along Mile 1, Segment 1, of the proposed route.

3. To determine its routing options, EKPC engaged the services of Photo Science Geospatial Solutions (Photo Science) of Lexington, Kentucky. Photo Science performed aerial data collection, field reconnaissance and modeling for comparison of

viable alternative routes over which the new transmission lines would be built. Please explain how routes were determined to be “viable.”

4. Please explain how EKPC chose the macro-corridor in which the proposed transmission line was sited, and provide all documents which form the basis of that choice.

5. EKPC adopted an approach in its transmission line siting that used several parameters or factors to determine the most favorable line route within a general macro transmission corridor. Some of the factors considered were proximity to residences, commercial and industrial buildings, forests, wetlands, and line length co-location opportunities with roads and existing transmission lines. Please identify what other factors were considered. Also, please list all factors considered in the siting of the proposed transmission line. Please list them in order of priority, with an explanation of how factors are distributed in the list of priorities.

6. EKPC’s siting approach selected sample routes within the macro-corridor and ranked them. Please provide all documentation relating to the sample routes, including but not limited to maps, surveys, and accounting (cost estimates) documents, and documents that describe how the sample routes are ranked. Please provide all documents related to how the sample routes compared to one another. Please provide their rankings and all related documents.

7. For each sample route within the macro-corridor, the line siting approach used by EKPC assigned weights to each factor and ranked the various routing options to

select the best option. Please provide all documents related to EKPC's selection of the "best option."

8. EKPC selected a preliminary route subject to further refinements and enhancements based on local input and detailed data. Please provide all documentation of the local input and detailed data that has been obtained by or for EKPC thus far. Please state whether and how EKPC has considered and/or will consider each item of input and piece of data for purposes of modifying the proposed route.

9. Please identify all existing rights-of-way and transmission lines within the proposed macro-corridor. As to each of the four proposed transmission line segments, identify which rights-of-way and transmission lines are proposed to be used for the project. Identify which rights-of-way and transmission lines are not proposed to be used for the project, and explain why not.

10. Please explain why the fourth transmission line segment uses significantly more new rights-of-way than co-location and rebuilds.

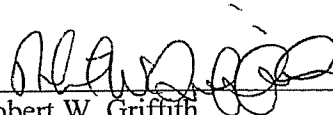
11. EKPC proposed a certain capital outlay for the proposed plan, both in its original and modified plans. However, cost details for other alternative plans were not provided. Please provide all cost details for all alternative plans and routes that are technically feasible, and all related documents.

12. ICF Resources, L.L.C., ("ICF") the Commission's Consultant, suggests that an assessment of a line routing alternative that adds the goal of minimizing the need for new rights-of-way is needed. Please provide all documents which relate to such an

assessment. If you disagree with ICF's suggestion, please provide all documents which support or form the basis of your disagreement.

13. ICF Resources notes that EKPC provided insufficient information to examine EKPC's selection of the proposed path to minimize the need to acquire new rights-of-way. If you disagree with ICF's observation, please provide all information which you believe supports your position and all documents upon which your position is based.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing was duly served by mailing, first class postage prepaid to the following:

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This 10th day of August, 2005.


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