



139 East Fourth Street, Room 2500 AT II  
P.O. Box 960  
Cincinnati, Ohio 45201-0960  
Tel: 513-419-1847  
Fax: 513-419-1846  
[anita.schafer@duke-energy.com](mailto:anita.schafer@duke-energy.com)

Anita M. Schafer  
Sr. Paralegal

**VIA HAND DELIVERY**

May 20, 2010

RECEIVED

MAY 20 2010

PUBLIC SERVICE  
COMMISSION

Mr. Jeff Derouen  
Executive Director  
Kentucky Public Service Commission  
211 Sower Blvd.  
Frankfort, KY 40601

Case No. 2010-00203

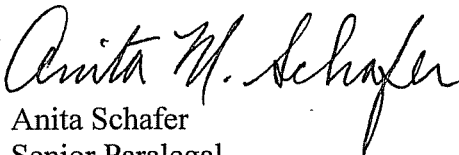
Re: *Duke Energy Kentucky, Inc.'s Application For Approval to Transfer Functional Control of Certain Transmission Assets From the Midwest Independent Transmission System Operator to the PJM Interconnection Regional Transmission Organization and Request for Expedited Treatment*  
Case No. 2010-xxxx

Dear Mr. Derouen:

Enclosed please find an original and twelve copies of *Duke Energy Kentucky Inc.'s Application for Approval* for filing in the above referenced matter.

Please date-stamp the two copies of the letter and the filings and return to me in the enclosed envelope.

Sincerely,

  
Anita Schafer  
Senior Paralegal

cc: Dennis Howard

RECEIVED

MAY 20 2010

PUBLIC SERVICE  
COMMISSION

BEFORE THE  
KENTUCKY PUBLIC SERVICE COMMISSION

In The Matter of:

Duke Energy Kentucky, Inc.'s Application for Approval )  
To Transfer Functional Control of its Transmission Assets )  
From the Midwest Independent Transmission System )  
Operator to the PJM Interconnection Regional Transmission )  
Organization And Request for Expedited Treatment )

Case No. 2010- 00203

---

DUKE ENERGY KENTUCKY, INC.'S APPLICATION FOR APPROVAL TO TRANSFER  
FUNCTIONAL CONTROL OF CERTAIN TRANSMISSION ASSETS FROM THE  
MIDWEST INDEPENDENT TRANSMISSION SYSTEM OPERATOR TO THE PJM  
INTERCONNECTION REGIONAL TRANSMISSION ORGANIZATION AND REQUEST  
FOR EXPEDITED TREATMENT

---

Now comes Duke Energy Kentucky, Inc. (Duke Energy Kentucky or the Company), and hereby requests that the Kentucky Public Service Commission (Commission) approve the transfer of functional control over the Company's transmission assets consisting of eighteen 138 kV "high side" connections including breakers and switches (138 kV Connections) from the Midwest Independent System Transmission Operator Inc., (the Midwest ISO) Regional Transmission Organization (RTO) to the PJM Interconnection, L.L.C. This transfer is appropriate because Duke Energy Ohio, Inc., (Duke Energy Ohio) which owns and operates the 138 kV and above transmission delivery system by which Duke Energy Kentucky is currently interconnected to the Midwest ISO, will leave the Midwest ISO RTO and join the PJM RTO.

The transfer of control will not harm the Company's ratepayers and will not affect rates or prejudice the outcome of any future rate case. Moreover, the RTO realignment will not adversely affect the Company's ability to continue to provide safe and reliable electric service to customers. Further, Duke Energy Kentucky commits that it will not seek to recover through base

rates, any exit fees imposed by the Midwest ISO, nor will it seek to simultaneously recover transmission expansion costs from both PJM and the Midwest ISO for the same periods, even though the Company itself may face such double charges of transmission expansion costs as a result of this RTO realignment.<sup>1</sup>

Because Duke Energy Kentucky commits to hold customers harmless from any exit fees and overlapping (same time period) transmission expansion costs resulting from this RTO realignment, Duke Energy Kentucky requests that the Commission approve this Application without evidentiary hearing as it is in the public interest. In the alternative, if the Commission determines that a hearing is necessary, Duke Energy Kentucky requests that the Commission issue a procedural schedule including dates for filing of intervention, filing of comments and direct testimony, and discovery. Due to the timing of this transaction, as explained below, Duke Energy Kentucky requests the Commission issue an order approving the proposed RTO realignment prior to December 1, 2010.

#### **I. NOTICE OF RTO REALIGNMENT.**

Duke Energy Kentucky's RTO alignment will come about because its parent, Duke Energy Ohio has elected to leave the Midwest ISO and join PJM. Duke Energy Kentucky has limited transmission facilities, consisting solely of eighteen 138 kV Connections, the functional control of which would be transferred from the Midwest ISO to PJM. These eighteen 138 kV Connections serve as bridges between the Duke Energy Ohio transmission system and the high

---

<sup>1</sup> Currently a portion of the FERC-jurisdictional transmission rate paid for service to Duke Energy Kentucky includes an RTO-wide allocation of the costs for certain high-voltage transmission expansions, referred to as MTEP. It appears that Duke Energy Kentucky may be obligated to pay a share of these costs, for expansions already "in the queue," even after Duke Energy Kentucky leaves the Midwest ISO. Once Duke Energy Kentucky joins PJM, the new FERC-jurisdictional transmission rate paid for service to Duke Energy Kentucky will include an RTO-wide allocation of the costs for certain high-voltage transmission expansions, referred to as RTEPP. Duke Energy Kentucky reserves the right to contest its own requirement to "double pay" for transmission expansion costs, but in any event commits that it will not seek to pass through both MTEP and RTEPP costs for the same time period to its ratepayers.

side of Duke Energy Kentucky transformers that step down to serve the Duke Energy Kentucky distribution system. The Company's transmission and distribution system is not interconnected to any Midwest ISO utility other than Duke Energy Ohio and, consequently, would no longer have a direct point of interconnection to the Midwest ISO once Duke Energy Ohio transfers control of its transmission facilities to PJM. Thus the RTO realignment will keep outage coordination and related functions for these eighteen 138 kV Connections under the functional control of the same RTO as the Duke Energy Ohio transmission system to which they are tied.

Kentucky Revised Statutes (KRS) 278.020 and 278.218 vest the Commission with jurisdiction over a change in control such as that contemplated here. Nonetheless, the Company respectfully submits that the limited and discrete nature of the facilities at issue sets this case apart from a typical merger, or even an RTO membership decision by a larger company with a more developed transmission system. Accordingly, Duke Energy Kentucky requests the Commission approve the transaction as being for a proper purpose and in the public interest.<sup>2</sup> The Company further requests that, given the *de minimis* nature of the jurisdictional facilities at issue, such an order be issued on a summary basis without hearing.

Duke Energy Ohio has informed Duke Energy Kentucky that pending Federal Energy Regulatory Commission (FERC) approval, it will withdraw from the Midwest ISO and join PJM effective January 1, 2012. Upon its joining the Midwest ISO as a member, Duke Energy Ohio transferred functional control over its entire 138 kV (and higher voltage) transmission to the Midwest ISO. Because of its interconnectivity to the Duke Energy Ohio transmission system, and its effective status as a transmission dependent utility, Duke Energy Kentucky likewise became a Midwest ISO participant, and the Midwest ISO assumed control over the Company's

---

<sup>2</sup> KRS 278.218 provides the Commission shall grant its approval of a transfer of ownership of or control, or the right to control, any assets if the transaction is for a proper purpose and is consistent with the public interest.

eighteen 138 kV Connections. For operational purposes, the same relationship between Duke Energy Ohio and Duke Energy Kentucky should be maintained when Duke Energy Ohio completes its PJM realignment. Therefore, when Duke Energy Ohio moves to PJM, the Company respectfully submits that it will be in the public interest for Duke Energy Kentucky to move as well to participate fully in the PJM market and to avoid potential inefficiencies, operational complexities, and costs that would be created by introducing a Midwest ISO/PJM seam affecting both Duke Energy Kentucky's generation and its load.<sup>3</sup>

Duke Energy Kentucky is submitting its regulatory filings to the Commission at the present time so that the Company may complete its realignment prior to the 2011 PJM capacity auction for the 2014/2015 planning period. A Midwest ISO withdrawal requires a one-year advance notification. Participation in the capacity auction, which requires submission of data to PJM near the beginning of 2011, will place financially binding commitments on Duke Energy Kentucky for both its generation and its load. These commitments cannot easily be unwound. Accordingly, in order to avoid any regulatory uncertainty, Duke Energy Kentucky respectfully requests that the Commission take final action on this Application before December 1, 2010. This will permit Duke Energy Kentucky to participate in the PJM forward capacity auctions in 2011 for the planning year 2014/2015. The actual effective date for Duke Energy Kentucky joining PJM will be the date that Duke Energy Ohio's transmission system is realigned to PJM, which is anticipated to be January 1, 2012. Duke Energy Ohio will apply to the FERC to seek its

---

<sup>3</sup> Once Duke Energy Ohio moves from the Midwest ISO to PJM, Duke Energy Kentucky's generation, which is connected to Duke Energy Ohio's transmission system, will be in PJM. Duke Energy Kentucky's distribution system will be separated from the Midwest ISO by Duke Energy Ohio's transmission system (i.e., PJM will be between Duke Energy Kentucky and the Midwest ISO). While it is technically possible to *pseudo-tie* Duke Energy Kentucky's load *through* PJM to the Midwest ISO, and to further *pseudo-tie* Duke Energy Kentucky's generation *from* PJM to the Midwest ISO and thus, preserve in virtual form, some mode of Duke Energy Kentucky participation in the Midwest ISO, such an arrangement would add unnecessary complexity and costs.

approval of the Midwest ISO withdrawal and the alignment with PJM, and Duke Energy Kentucky will join in that petition for the reasons described above.

**II. THE RTO REALIGNMENT WILL RESULT IN A TECHNICAL CHANGE IN CONTROL OVER THE COMPANY'S EIGHTEEN 138 kV CONNECTIONS.**

Duke Energy Kentucky submits that the contemplated move from one RTO to another will result only in a transfer of control over eighteen limited 138 kV Connections as described above. Duke Energy Kentucky respectfully submits that the switch to PJM will not result in a change in control over the utility itself under KRS 278.020(4) and (5). Moreover, the RTO realignment will not result in a change and control over Duke Energy Kentucky's generation or 69 kV transmission facilities. Accordingly, given the limited nature of the facilities subject to a change in control, and further given the Company's commitments to hold customers harmless for any exit fees and overlapping transmission expansion costs resulting from this realignment, this realignment does not warrant a full scale investigation.

Duke Energy Kentucky can only change its rates through a base rate case filed before the Commission. The RTO realignment will not affect the Commission's jurisdiction to determine whether Duke Energy Kentucky's rates are fair, just and reasonable. At this time, costs associated with the RTO realignment cannot be known or evaluated with the precision that would come in such a future rate case. Accordingly, the Company proposes that any issues involving rate impacts resulting from the RTO realignment, if any, be addressed in the context of the Company's next electric base rate case. Further, as noted Duke Energy Kentucky commits that it will not seek to include in base rates, the recovery of any exit fees imposed by the Midwest ISO as a part of this realignment. Similarly, Duke Energy Kentucky will not seek to double recover transmission expansion fees for the same periods as assessed by both RTOs. As with any rate increase petition under Kentucky law, the Company has the burden of supporting,

and the Commission (as well as any intervening party in that future rate case) has the opportunity to review, the fairness, justness, and reasonableness of the expenses at that time. Because any rate issues will be addressed in such a future rate proceeding, ratepayers will not be harmed by a finding that the RTO Realignment is consistent with the public interest. In other words, the Commission will not abdicate any authority over any change in Kentucky rates by granting the relief requested in this pleading.

WHEREFORE, Duke Energy Kentucky respectfully requests that before December 1, 2010, the Commission issue an Order pursuant to KRS 278.218 declaring that the anticipated withdrawal from the Midwest ISO and enrollment into PJM is in the public interest and should be approved.

#### **Introduction**

1. Duke Energy Kentucky is a Kentucky corporation with its principal office and principal place of business at 139 East Fourth Street, Cincinnati, Ohio 45202. Its Kentucky office is 525 West Fifth Street, Suite 228, Covington, Kentucky 41011.<sup>4</sup> Its mailing address is P.O. Box 960, Cincinnati, Ohio 45201.

2. Duke Energy Kentucky is a utility engaged in the gas and electric business. Duke Energy Kentucky purchases, sells, and transports natural gas in Boone, Campbell, Gallatin, Grant, Kenton and Pendleton Counties, Kentucky. Duke Energy Kentucky also generates electricity, which it distributes and sells in Boone, Campbell, Grant, Kenton and Pendleton Counties.

3. A copy of Duke Energy Kentucky's Articles of Incorporation is on file with this Commission in Case Number 2009-00202 and is hereby incorporated herein by reference.

---

<sup>4</sup> As of September 10, 2009, Duke Energy Kentucky relocated its principal Kentucky office. Duke Energy Kentucky filed notice of this change pursuant to 807 KAR 5:003, on or about August 28, 2009.

## Background

4. Duke Energy Kentucky, f/k/a The Union Light Heat & Power Company, through its then-ultimate parent company Cinergy Corp. (Cinergy), joined the Midwest ISO in 1997. Cinergy joined as a transmission owner on behalf of its then three utility operating companies, Duke Energy Ohio (f/k/a The Cincinnati Gas & Electric Company), Duke Energy Kentucky and Duke Energy Indiana (f/k/a PSI Energy). At the time of Cinergy's membership, Duke Energy Kentucky did not own its own generation and procured those services from its immediate parent, Duke Energy Ohio. Similarly, Duke Energy Kentucky relied upon Duke Energy Ohio's 138 kV and above transmission delivery system to serve its load.

5. On or about December 5, 2003, in Case No. 2003-00252, the Commission approved Duke Energy Kentucky's acquisition of three generation assets from Duke Energy Ohio - East Bend Unit 2, Miami Fort Unit 6 and six combustion turbines at the Woodsdale Station. Effective January 1, 2006, Duke Energy Kentucky completed the acquisition of these generation assets.

6. Since acquiring the generating units, Duke Energy Kentucky has operated these units, considering bilateral contract options but otherwise buying and selling energy and ancillary services through the markets administered by the Midwest ISO and supplying the Company's load obligation.

7. PJM is an RTO that coordinates the movement of wholesale electricity in all or parts of Delaware, Illinois, Indiana, Kentucky, Maryland, Michigan, New Jersey, North Carolina, Ohio, Pennsylvania, Tennessee, Virginia, West Virginia and the District of Columbia.<sup>5</sup>

8. Currently, Duke Energy Kentucky is the only investor-owned electric utility

---

<sup>5</sup> PJM's footprint includes only a very small portion of northeastern North Carolina that is served by an affiliate of Dominion Resources and, as such, Duke Energy Carolinas' service territory is not within the PJM footprint.



under the Commission's jurisdiction that is a member of the Midwest ISO.<sup>6</sup> With the recently announced withdrawal of the FirstEnergy Company utility companies from the Midwest ISO and enrollment with PJM,<sup>7</sup> Duke Energy Ohio would be the only Ohio utility with transmission facilities operated by the Midwest ISO. Duke Energy Ohio has notified Duke Energy Kentucky that it will withdraw from the Midwest ISO and join the PJM RTO effective January 1, 2012. This move presents many benefits for Duke Energy Ohio, including lower RTO administration fees, aligning co-owners of Duke Energy Ohio's jointly-owned generating stations in a single RTO for future investment planning, and improved efficiencies in Ohio's competitive retail and wholesale markets. For example, when Duke Energy Ohio does join PJM, the entire state of Ohio will be within one RTO footprint, allowing state regulators to work with a single RTO to ensure reliable and cost-effective service for the state.

9. Following Duke Energy Ohio to PJM will provide benefits and efficiencies to Duke Energy Kentucky and its customers. As described above, once Duke Energy Ohio is moved from the Midwest ISO to PJM, Duke Energy Kentucky's generation, located in Ohio and Kentucky and attached to and dependent upon Duke Energy Ohio's transmission delivery system, will be in PJM regardless of whether Duke Energy Kentucky moves to PJM. Consequently, unless Duke Energy Kentucky also moves to PJM, the Company's generation will be in PJM but its load will be in the Midwest ISO, creating potential inefficiencies and additional, unnecessary costs to serve load. PJM's transparent capacity market should also facilitate off-system sales of capacity or, in the event that the Company requires additional capacity in the future, allows for the economic purchase of capacity through a carefully

---

<sup>6</sup> Kentucky Power is a member of PJM. In Case No. 2010-0043, Big Rivers Electric Corporation has recently filed its application requesting transfer of control to the Midwest ISO.

<sup>7</sup> *FirstEnergy Service Company v. PJM Interconnection LLC*, Docket Nos. ER09-1589 and EL10-6-00, Order Addressing RTO Alignment and Complaint, December 17, 2009.

monitored market.<sup>8</sup> Finally, as the capacity market for the PJM market is forward looking, the Company, and in turn customers, are afforded a greater level of certainty with regard to future capacity prices, and less price volatility than what is in the Midwest ISO. The Midwest ISO's resource adequacy paradigm uses a month-ahead capacity auction that does not provide good market signals because it is a thinly-traded backstop to the much larger, non-transparent underlying bilateral capacity market. By contrast, PJM's capacity market looks much further into the future (three years ahead) and is robust. This forward transparency will facilitate and increase the efficiency of planning for both off-system sales and addition or retirement of resources.

#### **Kentucky Law**

10. The transfer of control statute, KRS 278.020, prohibits any transfer of control, or the right to control any utility by the "sale of assets, transfer of stock, or otherwise," absent Commission approval.<sup>9</sup>

11. Similarly, Kentucky's asset transfer statute, KRS 278.218, provides in relevant part that "[N]o person shall acquire or transfer ownership of or control, or the right to control, any assets that are owned by a utility...without prior approval of the commission, if the assets have an original book value of one million dollars (\$1,000,000) or more and:

- a. The assets are to be transferred by the utility for reasons other than obsolescence; or

---

<sup>8</sup> Duke Energy Kentucky has an off-system sales mechanism in place whereby customers receive the first \$1,000,000 in net off system sales (including energy, capacity and ancillary services) and 50% of all sales thereafter on an annual basis.

<sup>9</sup> KY. REV. STAT. ANN §278.020(5) (2010).

- b. The assets will continue to provide the same or similar service to the utility or its customers.”<sup>10</sup>

KRS 278.218 further sets forth the standard under which the Commission will consider a transaction, providing in relevant part, that the “Commission shall grant its approval if the transaction is for a proper purpose and consistent with the public interest.”<sup>11</sup>

12. Duke Energy Kentucky owns and operates three generating stations, representing a total of 1,141 megawatts of capacity (winter rating), and a 69 kV distribution and transmission system to serve its retail load. The only transmission facilities greater than 69 kV owned by Duke Energy Kentucky consist of the eighteen “high side” 138 kV Connections. Duke Energy Ohio owns the transmission delivery facilities located in Kentucky above 69 kV. Neither the Midwest ISO nor PJM typically assumes functional control over transmission facilities under 100 kV. Since joining the Midwest ISO, Duke Energy Kentucky has participated in the energy and ancillary markets but has maintained functional/operational control over its generation and distribution and transmission facilities (other than the 138 kV Connections). This will not change with the move to PJM.

13. Attachment 1 is a copy of the Midwest ISO’s list of all transmission facilities owned by Duke Energy Corporation (or its subsidiary Duke Energy Business Services, Inc. that have functional control transferred to the Midwest ISO as of June 2009.<sup>12</sup> As demonstrated by this document, the Duke Energy-owned transmission facilities transferred to the Midwest ISO’s functional control are only 138 kV and above. There are eighteen 138 kV Connections that are owned by Duke Energy Kentucky that are technically under the functional control of the

---

<sup>10</sup> KY. REV. STAT. ANN §278.218 (2010).

<sup>11</sup> *Id.*

<sup>12</sup> See [http://www.midwestmarket.org/publish/Document/7be606\\_10b7aacd66e\\_-7f0f0a48324a/Duke%20Energy%20Business%20Services,%20LLC\\_June%202009.pdf?action=download&\\_property=Attachment](http://www.midwestmarket.org/publish/Document/7be606_10b7aacd66e_-7f0f0a48324a/Duke%20Energy%20Business%20Services,%20LLC_June%202009.pdf?action=download&_property=Attachment) (last visited February 19, 2010).

Midwest ISO. As part of the historical arrangement with the Midwest ISO, Duke Energy Kentucky's transmission facilities (69 kV and aforementioned 138 kV Connections) are allocated a portion of the transmission revenues collected by the Midwest ISO as agent for Duke Energy under the Midwest ISO Attachment O. As noted, those 69 kV facilities are not, nor have they ever been, subject to the Midwest ISO functional control.<sup>13</sup> The same will hold true following the move to PJM. Duke Energy Kentucky's 69 kV transmission facilities and 138 kV Connections will be included in the overall transmission revenue requirement calculation for Duke Energy Corp. under PJM Schedules, and PJM will function as revenue collection agent for those facilities. PJM will not have functional control over those Duke Energy Kentucky-owned 69 kV facilities, but it will have control over the eighteen 138 kV Connections.

14. Duke Energy Kentucky's move from the Midwest ISO to PJM does not constitute a change in control of the utility itself as contemplated under KRS 278.020. The RTO realignment does not involve an acquisition or transfer of ownership of, control, or the right to control the utility under the jurisdiction of the Commission. There is neither a sale of any asset nor transfer of any stock involved in the contemplated RTO realignment.<sup>14</sup> However, the contemplated alignment will result in a transfer of a right to control a utility asset, namely the eighteen 138 kV Connections, thereby invoking the Commission's jurisdiction under KRS 278.218. Duke Energy Kentucky respectfully asserts that the contemplated RTO realignment meets the proper purpose and public interest standard under KRS 278.218.

15. As part of the membership agreement with the Midwest ISO, upon the companies' withdrawal from the Midwest ISO, Duke Energy Kentucky will incur an exit fee

---

<sup>13</sup> See Attachment 1.

<sup>14</sup> See *In the Matter of the Investigation into the Membership of Louisville Gas and Electric Company and Kentucky Utilities Company in the Midwest Independent Transmission System Operator, Inc.* (Case No. 2003-00266) (Order April 23, 2004 at 28).

from the Midwest ISO. And for some period of time to be determined through negotiations with the Midwest ISO, Duke Energy Kentucky will continue to be obligated to pay its allocated portion of the Midwest ISO Transmission Expansion Planning (MTEP) fees for those transmission expansion projects approved when the Company was a member. Based upon initial discussions with Duke Energy Ohio, Duke Energy Kentucky estimates its pro rata share of the exit fees to be approximately 15% of the total amount to be assessed to the two companies. Although the precise dollar impact of Duke Energy Kentucky's withdraw from the Midwest ISO is not yet known, based upon fee determinations in recent similar RTO withdrawals in other jurisdictions,<sup>15</sup> Duke Energy Kentucky roughly estimates that its share of the assessed Midwest ISO costs upon leaving will be approximately \$11 million.<sup>16</sup> Similarly, upon joining PJM, Duke Energy Kentucky will incur membership obligations such as membership/administrative fees and its fair share of Regional Transmission Expansion Planning Protocol (RTEPP) costs (similar to the Midwest ISO's MTEP). Duke Energy Kentucky commits that it will not seek to recover through base rates, any exit fee imposed by the Midwest ISO as a result of this realignment. Further, Duke Energy Kentucky commits that in its next electric base rate case, the Company will not seek to recover from customers transmission expansion costs from both RTEPP and MTEP assessments for the same time periods.

16. In this filing, Duke Energy Kentucky is not seeking the Commission's approval for cost recovery for any costs not already included in base rates. Nor is Duke Energy Kentucky requesting the Commission pre-approve recovery of the PJM administrative fees and RTEPP costs at this time. In fact, those costs have yet to be determined. Duke Energy Kentucky will

---

<sup>15</sup> In the matter of the Application of Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company for Authority to Establish a Standard Service Offer Pursuant To R.C. § 4928.143 in the Form of an Electric Security Plan, Case No. 10-388-EL-SSO, (Attachment WRR-1, line 12 of the Direct Testimony of William R. Ridmann) (Filed March 31, 2010); estimating FirstEnergy's Midwest ISO Exit Fees to be \$39.7 million.

<sup>16</sup> This includes an estimation of exit fees based upon the FirstEnergy proceeding and the estimated MTEP costs.

address cost recovery issues, if any, during its next retail electric rate case. At that time, the Company will have a more accurate total of the final costs of its RTO realignment. Further, the Company will have the burden of proof that any costs are fair just and reasonable and appropriate for recovery as an appropriate test year expense.

17. The Company hereby acknowledges that the Commission's issuance of an Order approving the RTO realignment does not constitute a Commission decision on any rate increase associated with the RTO realignment, and will not argue to the contrary in the future.

**The RTO Realignment is in the Public Interest**

18. Duke Energy Kentucky respectfully submits that its realignment is in the public interest.

19. The RTO realignment will not adversely affect the Company's reliability. Both the Midwest ISO and PJM have proven track records for operating reliable transmission systems in the Commonwealth of Kentucky. PJM has a long history of success in coordinating the movement of wholesale electricity. In 1997, PJM became the first fully functioning Independent System Operator approved by FERC. In 2002, PJM became the nation's first fully functioning RTO. PJM has been coordinating transmission in Kentucky since 2004 when American Electric Power became a member. Moreover, as noted above, putting Duke Energy Kentucky in the same RTO as Duke Energy Ohio will keep coordination of outages on Duke Energy Kentucky's 138 kV Connections under the control of the RTO that will control the appurtenant transmission system.

20. As reflected in its most recently filed Integrated Resource Plan, Duke Energy Kentucky has sufficient generation to satisfy its load, with surplus to provide the ability to

engage in off-system sales for several years.<sup>17</sup> Duke Energy Kentucky expects that the RTO realignment will not adversely affect the Company's ability to engage in off-system sales and its ability will likely be enhanced in a PJM alignment because PJM's transparent, forward capacity market will facilitate capacity sales. This in turn directly benefits Kentucky customers because Duke Energy Kentucky has an off-system sales sharing mechanism (Rider PSM) under which its customers enjoy the benefit of the first \$1 million of net benefit from off-system sales (capacity, energy and ancillary services) and a 50% share of the net benefit from off-system sales in excess of \$1 million. This is reflected through a credit on customers' bills, thereby reducing their ultimate electric rate.

21. PJM's forward-looking capacity market will also provide benefits to Duke Energy Kentucky as it conducts its future resource planning in that the Company will have the benefit of transparent forward pricing data farther into the future. This information will assist the Company and the Commission in evaluating over time appropriate changes to the capacity resources secured to serve the Company's customers.

22. Duke Energy Kentucky expects that there will be no material change in the wholesale cost of energy arising from this change. The marginal price differential between the PJM and Midwest ISO energy markets in this region tends to be relatively small. Therefore, the effect on cost to serve load – positive or negative – should be small in the event that Duke Energy Kentucky needs to purchase any energy in a real-time market. Likewise, the value realized for off-system sales of economy energy will not be materially affected by the proposed change.

---

<sup>17</sup> In the matter of the 2008 Integrated Resource Plan of Duke Energy Kentucky, Inc., Case No. 2008-00248, (filed July 1, 2008) (Staff Report Issued April 22, 2010).

23. The estimated annual membership and administrative fees for PJM are comparable to or slightly less than those for the Midwest ISO.

24. As discussed above, Duke Energy Kentucky is directly tied into Duke Energy Ohio's 138 kV and higher voltage transmission delivery systems to provide safe, reliable and affordable electric service to its Kentucky customers. Duke Energy Ohio is realigning with PJM. Although it is technically feasible for Duke Energy Kentucky to remain in the Midwest ISO after Duke Energy Ohio realigns with PJM, the complexity created by remaining in the Midwest ISO would translate into additional costs to customers because:

- a. Duke Energy Kentucky's distribution system serving its entire load will be separated from the Midwest ISO by Duke Energy Ohio's transmission system (*i.e.*, PJM will be between Duke Energy Kentucky and the Midwest ISO). Although it is technically possible to pseudo-tie Duke Energy Kentucky's load *through* PJM to the Midwest ISO, and to further pseudo-tie Duke Energy Kentucky's generation *from* PJM to the Midwest ISO, and thus preserve, in virtual form, some mode of Duke Energy Kentucky participation in the Midwest ISO, the pseudo-tie arrangements will add unnecessary complexity and costs.
- b. To continue to deliver power into the Midwest ISO, Duke Energy Kentucky would need to install additional metering and other equipment. Duke Energy Kentucky would also need personnel to complete additional scheduling functions.

The operational complexities and additional costs associated with remaining in the Midwest ISO would be avoided if Duke Energy Kentucky realigns with PJM at the same time as Duke Energy



Ohio.

25. In addition to the types of explicit costs referenced above, the Company is concerned that in such a setup there is a greater potential for a differential between the price Duke Energy Kentucky is paid for the power it generates, and the price the load pays for the power it consumes, even without factoring in the added costs for the pseudo-tie arrangement. This could be a significant “hidden cost” of staying behind in the Midwest ISO.

26. It should be noted that Duke Energy Kentucky also considered, for sake of completeness, a third alternative, namely dropping Duke Energy Kentucky out of the Midwest ISO but not joining PJM. It quickly became apparent that this alternative is unworkable, starting with the basic proposition that Duke Energy Kentucky is too small to operate on an economically efficient basis as its own balancing area authority. And, as in the scenario involving staying in the Midwest ISO, Duke Energy Kentucky would lose the benefit of having dispatch of generation to serve its load optimized as part of a single market because its generation would be in PJM. In both these regards, Duke Energy Kentucky differs from Louisville Gas & Electric and Kentucky Utilities, which have significantly larger scope and are served by generation completely within their footprints.

27. The Company hereby acknowledges, and commits it will not argue in the future that a Commission finding in this case that the RTO realignment is in the public benefit constitutes a Commission decision on any rate increase or decrease associated with RTO realignment.

#### **Requested Relief**

28. Duke Energy Kentucky respectfully requests that the Commission grant the relief

requested herein expeditiously, but prior to December 2010. Duke Energy Kentucky must provide the Midwest ISO official notice of its withdrawal no later than December 31, 2010. Duke Energy Kentucky will also seek FERC approval of this transaction.

WHEREFORE, Duke Energy Kentucky respectfully requests that the Commission expeditiously issue an Order declaring that the Company's RTO realignment is for a proper purpose and in the public interest. If the Commission determines that a hearing is necessary, the Company requests that the Commission issue a procedural schedule including dates for intervention, filing of comments and direct testimony, and discovery sufficient to permit the Commission to enter an order approving the requested realignment prior to December 1, 2010.

Respectfully submitted,

DUKE ENERGY KENTUCKY, INC.



Rocco Q. D'Ascenzo (92796)

Senior Counsel

Amy B. Spiller (85309)

Associate General Counsel

Duke Energy Business Services, LLC

139 East Fourth Street, Rm 25 AT II

Cincinnati, Ohio 45201-0960

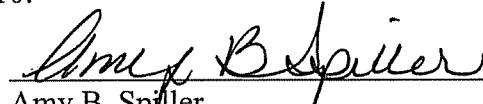
Phone: (513) 419-1852

Fax: (513) 419-1846

e-mail:rocco.d'ascenzo@duke-energy.com

**CERTIFICATE OF SERVICE**

This is to certify that a copy of the foregoing has been served via hand delivery to the following party on this 20th day of May 2010:

  
Amy B. Spiller

Hon. Dennis Howard  
Office of the Attorney General  
Utility Intervention and Rate Division  
1024 Capital Center Drive  
Frankfort, Kentucky 40601

**Transmission Owner: Duke Energy Business Services, LLC  
Transmission Facilities Transferred to The Midwest ISO's Functional Control  
June 2009**

<b>Substations</b>					
Substation Name	State	Max kV	Min kV	Sub ID (optional)	Comments
A. E. Staley	IN	138	138	138 side transferred to MISO functional control	
Airwest	IN	138	138	138 side transferred to MISO functional control	
Amax Chinook	IN	138	138	138 side transferred to MISO functional control	
AMO	IN	345	345	345 side transferred to MISO functional control	
Anaconda	IN	138	138	138 side transferred to MISO functional control	
Applied Extrusion Technologies	IN	138	138	138 side transferred to MISO functional control	
ATTICA	IN	230	230	230 side transferred to MISO functional control	
BATESVILLE 345kV	IN	345	138		
BEDFORD	IN	345	138		
Bethlehem	IN	138	138	138 side transferred to MISO functional control	
BLOOMINGTON 230	IN	230	138		
Bloomington Dillman Road	IN	138	138	138 side transferred to MISO functional control	
Bloomington North West	IN	138	138	138 side transferred to MISO functional control	
Bloomington Rogers St	IN	138	138	138 side transferred to MISO functional control	
Bloomington West	IN	138	138	138 side transferred to MISO functional control	
Bloomington Whitehall Pike	IN	138	138	138 side transferred to MISO functional control	
C. F. Industries	IN	138	138	138 side transferred to MISO functional control	
Cadiz	IN	138	138	138 side transferred to MISO functional control	
CARMEL 146TH ST	IN	230	230		
Carmel Southeast	IN	138	138	138 side transferred to MISO functional control	
CAYUGA 345	IN	345	345	IMPA owned 345/69 sub, 345 side transferred to MISO operational control	
CAYUGA CT	IN	345	345		
CAYUGA STATION	IN	345	230		
Clark Martime	IN	138	138	138 side transferred to MISO functional control	
Clarksville	IN	138	138	138 side transferred to MISO functional control	
Cloverdale	IN	138	138	138 side transferred to MISO functional control	
COLUMBUS 345kV	IN	345	230		
COLUMBUS DENOIS CREEK	IN	230	230		
COLUMBUS NORTH	IN	230	230		

**Transmission Owner: Duke Energy Business Services, LLC**  
**Transmission Facilities Transferred to The Midwest ISO's Functional Control**  
**June 2009**

**Substations**

Substation Name	State	Max kV	Min kV	Sub ID (optional)	Comments
Connersville	IN	138	138	138 side transferred to MISO functional control	
Crawfordsville	IN	138	138	138 side transferred to MISO functional control	
DEEDSVILLE	IN	345	345	IMPA owned 345/69 sub, 345 side transferred to MISO operational control	
DRESSER 345	IN	345	138		
Edwardsport Station	IN	138	138	138 side transferred to MISO functional control	
Fairview	IN	138	138	138 side transferred to MISO functional control	
FIVE POINTS	IN	230	138		
FRANKFORT 230	IN	230	230		
FRANKLIN	IN	230	230		
French Lick	IN	138	138	138 side transferred to MISO functional control	
French Lick Texas Eastern (TETC)	IN	138	138	138 side transferred to MISO functional control	
Friar Tuck	IN	138	138	138 side transferred to MISO functional control	
GALLAGHER STA	IN	230	138		
GEIST	IN	230	230	WVPA owned 230/69 sub, 230 side transferred to MISO operational control	
GIBSON STATION	IN	345	138		
Glenview	IN	138	138	138 side transferred to MISO functional control	
Greencastle	IN	138	138	138 side transferred to MISO functional control	
Greendale	IN	138	138	IMPA owned 138/34.5 sub, 138 side transferred to MISO operational control	
Greenfield Hastings Park	IN	138	138	IMPA owned 138/12 sub, 138 side transferred to MISO operational control	
Greenfield North	IN	138	138	IMPA owned 138/12 sub, 138 side transferred to MISO operational control	
GREENSBORO 345	IN	345	138	WVPA owned 345/69 sub, 345 side transferred to MISO operational control	
Greensburg 138kV	IN	138	138	138 side transferred to MISO functional control	
GREENTOWN 765	IN	765	138		
GREENWOOD CLARK TOWNSHIP	IN	230	230	WVPA owned 230/69 sub, 230 side transferred to MISO operational control	
GWYNNEVILLE	IN	345	345		
Hanover	IN	138	138	138 side transferred to MISO functional control	

**Transmission Owner: Duke Energy Business Services, LLC  
Transmission Facilities Transferred to The Midwest ISO's Functional Control  
June 2009**

<b>Substations</b>					
Substation Name	State	Max kV	Min kV	Sub ID (optional)	Comments
Hardinsburg	IN	138	138	138 side transferred to MISO functional control	
Henry County	IN	138	138	138 side transferred to MISO functional control	
HORTONVILLE	IN	345	345		
Huntington	IN	138	138	138 side transferred to MISO functional control	
Huntington River Fork	IN	138	138	138 side transferred to MISO functional control	
Indiana Arsenal	IN	138	138	138 side transferred to MISO functional control	
Jasonville	IN	138	138	138 side transferred to MISO functional control	
Jeffersonville	IN	138	138	138 side transferred to MISO functional control	
Kentucky Avenue	IN	138	138	138 side transferred to MISO functional control	
Klondike	IN	138	138	138 side transferred to MISO functional control	
Kokomo Chrysler South	IN	138	138	138 side transferred to MISO functional control	
Kokomo DELCO	IN	138	138	138 side transferred to MISO functional control	
KOKOMO EAST	IN	230	230		
KOKOMO HIGHLAND PK	IN	230	138		
LAFAYETTE 230	IN	230	138		
Lafayette AE Staley North	IN	138	138	138 side transferred to MISO functional control	
Lafayette Alcoa	IN	138	138	138 side transferred to MISO functional control	
Lafayette Caterpillar	IN	138	138	138 side transferred to MISO functional control	
Lafayette Cincinnati St	IN	138	138	138 side transferred to MISO functional control	
Lafayette Concord Road	IN	138	138	138 side transferred to MISO functional control	
Lafayette Cumberland Ave	IN	138	138	138 side transferred to MISO functional control	
Lafayette General Foods	IN	138	138	138 side transferred to MISO functional control	
Lafayette Haggerty	IN	138	138	138 side transferred to MISO functional control	
Lafayette REA Magnet	IN	138	138	138 side transferred to MISO functional control	
Lafayette South	IN	138	138	138 side transferred to MISO functional control	
Lafayette Southeast Switching Sta	IN	138	138	WVPA owned sub, 138 side transferred to MISO functional control	
Lafayette Subaru	IN	138	138	138 side transferred to MISO functional control	

Transmission Owner: Duke Energy Business Services, LLC					
Transmission Facilities Transferred to The Midwest ISO's Functional Control					
June 2009					
<b>Substations</b>					
Substation Name	State	Max kV	Min kV	Sub ID (optional)	Comments
Lafayette Tippecanoe Lab	IN	138	138	138 side transferred to MISO functional control	
Lake Holiday	IN	138	138	138 side transferred to MISO functional control	
Lapel	IN	138	138	138 side transferred to MISO functional control	
Laurel	IN	138	138	138 side transferred to MISO functional control	
Lewisville	IN	138	138	138 side transferred to MISO functional control	
Linton	IN	138	138	138 side transferred to MISO functional control	
LOGANSPORT SOUTH	IN	230	230		
Lone Star	IN	138	138	138 side transferred to MISO functional control	
Louisville Cement	IN	138	138	138 side transferred to MISO functional control	
Madison	IN	138	138	138 side transferred to MISO functional control	
Madison Michigan Ave	IN	138	138	138 side transferred to MISO functional control	
Madison West	IN	138	138	138 side transferred to MISO functional control	
Maple	IN	138	138	138 side transferred to MISO functional control	
Markland	IN	138	138	138 side transferred to MISO functional control	
Milltown 138kV	IN	138	138	138 side transferred to MISO functional control	
MITCHELL LOST RIVER	IN	345	345		
Mohawk	IN	138	138	138 side transferred to MISO functional control	
Mount Comfort	IN	138	138	138 side transferred to MISO functional control	
Mount Tabor	IN	138	138	138 side transferred to MISO functional control	
New Albany	IN	138	138	138 side transferred to MISO functional control	
New Albany Central	IN	138	138	138 side transferred to MISO functional control	
New Castle	IN	138	138	138 side transferred to MISO functional control	
New Castle Chrysler	IN	138	138	138 side transferred to MISO functional control	
NEW LONDON SWITCHING STA.	IN	230	230		
NOBLESVILLE STA	IN	345	138		
North Vernon	IN	138	138	138 side transferred to MISO functional control	
North Vernon West	IN	138	138	138 side transferred to MISO functional control	
NUCOR SWITCHING STA.	IN	345	345		

**Transmission Owner: Duke Energy Business Services, LLC**  
**Transmission Facilities Transferred to The Midwest ISO's Functional Control**  
**June 2009**

**Substations**

Substation Name	State	Max kV	Min kV	Sub ID (optional)	Comments
Oakland City	IN	138	138	138 side transferred to MISO functional control	
Old Ben Coal Co. Westfield	IN	138	138	138 side transferred to MISO functional control	
Parke County REMC	IN	138	138	138 side transferred to MISO functional control	
Peabody Hawthorn	IN	138	138	138 side transferred to MISO functional control	
PERU SOUTHEAST	IN	230	230		
Plainfield South	IN	138	138	138 side transferred to MISO functional control	
Pleasant Grove	IN	138	138	138 side transferred to MISO functional control	
PRESCOTT	IN	345	345		
Princeton	IN	138	138	138 side transferred to MISO functional control	
PUMPKIN CENTER	IN	230	230		
Purdue	IN	138	138	138 side transferred to MISO functional control	
Purdue N.W.	IN	138	138	138 side transferred to MISO functional control	
QUALITECH	IN	345	345		
Rockville	IN	138	138	138 side transferred to MISO functional control	
Sandborn	IN	138	138	138 side transferred to MISO functional control	
Sandcut	IN	138	138	138 side transferred to MISO functional control	
Scottsburg	IN	138	138	138 side transferred to MISO functional control	
Seymour	IN	138	138	138 side transferred to MISO functional control	
Seymour Airport Road	IN	138	138	138 side transferred to MISO functional control	
Seymour Industrial Park	IN	138	138	138 side transferred to MISO functional control	
Seymour Obrien St	IN	138	138	138 side transferred to MISO functional control	
Shawswick	IN	138	138	138 side transferred to MISO functional control	
Shelbyville North East	IN	138	138	138 side transferred to MISO functional control	
Shelbyville South West	IN	138	138	138 side transferred to MISO functional control	
Shoals	IN	138	138	138 side transferred to MISO functional control	
SPEED 345	IN	345	138		
SPENCER	IN	230	230		
Springboro	IN	138	138	138 side transferred to MISO functional control	
STAUNTON 230	IN	230	138	IMPA owned sub	



Transmission Owner: Duke Energy Business Services, LLC					
Transmission Facilities Transferred to The Midwest ISO's Functional Control					
June 2009					
Substations					
Substation Name	State	Max kV	Min kV	Sub ID (optional)	Comments
Stilesville	IN	138	138	138 side transferred to MISO functional control	
SUGAR CREEK	IN	345	345		
Terre Haute Allendale	IN	138	138	138 side transferred to MISO functional control	
Terre Haute East	IN	138	138	138 side transferred to MISO functional control	
Terre Haute Fruitridge	IN	138	138	138 side transferred to MISO functional control	
Terre Haute Margaret Ave	IN	138	138	138 side transferred to MISO functional control	
Terre Haute Pfizer	IN	138	138	138 side transferred to MISO functional control	
Terre Haute South 1st St	IN	138	138	138 side transferred to MISO functional control	
Terre Haute Vigo Industrial Park	IN	138	138	138 side transferred to MISO functional control	
Terre Haute Water St	IN	138	138	138 side transferred to MISO functional control	
THORNTOWN	IN	230	230		
	IN			WVPA owned 230/69 sub, 230 side transferred to MISO operational control	
TIPTON WEST		230	230		
VEEDERSBURG WEST	IN	230	230		
Vincennes	IN	138	138	138 side transferred to MISO functional control	
Wabash	IN	138	138	138 side transferred to MISO functional control	
WABASH RIVER STA.	IN	230	138		
WALTON 345	IN	345	230		
	IN			IMPA owned sub, 138 side transferred to MISO functional control	
Washington Municipal		138	138		
WEBSTER 230 YARD	IN	230	230		
	IN			138 side transferred to MISO functional control	
West Lafayette		138	138		
WESTWOOD 345	IN	345	138		
WHEATLAND	IN	345	345		
WHITESTOWN 345 KV YARD	IN	345	345	WVPA owned sub	
WHITESVILLE SOUTH	IN	230	230		
	IN			138 side transferred to MISO functional control	
Whitfield		138	138		
	IN			138 side transferred to MISO functional control	
Wilmington		138	138		
	KY			138 side transferred to MISO functional control	
AUGUSTINE		138	138		
	KY			138 side transferred to MISO functional control	
BELLEVUE		138	138		
BUFFINGTON	KY	345	138		
	KY			138 side transferred to MISO functional control	
COLD SPRING		138	138		

**Transmission Owner: Duke Energy Business Services, LLC  
Transmission Facilities Transferred to The Midwest ISO's Functional Control  
June 2009**

**Substations**

Substation Name	State	Max kV	Min kV	Sub ID (optional)	Comments
CONSTANCE	KY	138	138	138 side transferred to MISO functional control	
CRESCENT	KY	138	138	138 side transferred to MISO functional control	
DAYTON	KY	138	138	138 side transferred to MISO functional control	
DONALDSON	KY	138	138	138 side transferred to MISO functional control	
EAST BEND	KY	345	345		
FLORENCE	KY	138	138	138 side transferred to MISO functional control	
HANDS	KY	138	138	138 side transferred to MISO functional control	
HEBRON	KY	138	138	138 side transferred to MISO functional control	
KENTON	KY	138	138	138 side transferred to MISO functional control	
KENTUCKY UNIVERSITY	KY	138	138	138 side transferred to MISO functional control	
LAFARGE	KY	138	138	138 side transferred to MISO functional control	
LONGBRANCH	KY	138	138	138 side transferred to MISO functional control	
SILVER GROVE	KY	345	138		
WILDER	KY	138	138	138 side transferred to MISO functional control	
YORK	KY	138	138	138 side transferred to MISO functional control	
AK STEEL	OH	138	138	138 side transferred to MISO functional control	
ASHLAND	OH	138	138	138 side transferred to MISO functional control	
BECKETT	OH	138	138	138 side transferred to MISO functional control	
BECKJORD	OH	138	138	138 side transferred to MISO functional control	
BETHANY	OH	138	138	138 side transferred to MISO functional control	
BROWN	OH	138	138	138 side transferred to MISO functional control	
CARLISLE	OH	138	138	138 side transferred to MISO functional control	
CEDARVILLE	OH	138	138	138 side transferred to MISO functional control	
CHARLES	OH	138	138	138 side transferred to MISO functional control	
CITY OF HAMILTON	OH	138	138	138 side transferred to MISO functional control	
CLERMONT	OH	138	138	138 side transferred to MISO functional control	

**Transmission Owner: Duke Energy Business Services, LLC  
Transmission Facilities Transferred to The Midwest ISO's Functional Control  
June 2009**

<b>Substations</b>					
Substation Name	State	Max kV	Min kV	Sub ID (optional)	Comments
CLINTON COUNTY	OH	138	138	138 side transferred to MISO functional control	
COLLINSVILLE	OH	138	138	138 side transferred to MISO functional control	
COOPER	OH	138	138	138 side transferred to MISO functional control	
CORNELL	OH	138	138	138 side transferred to MISO functional control	
CUMMINSVILLE	OH	138	138	138 side transferred to MISO functional control	
DEER PARK	OH	138	138	138 side transferred to MISO functional control	
DICKS CREEK	OH	138	138	138 side transferred to MISO functional control	
DIMMICK	OH	138	138	138 side transferred to MISO functional control	
EASTWOOD	OH	138	138	138 side transferred to MISO functional control	
EBENEZER	OH	138	138	138 side transferred to MISO functional control	
ELMWOOD	OH	138	138	138 side transferred to MISO functional control	
EVENDALE	OH	138	138	138 side transferred to MISO functional control	
FAIRFIELD	OH	138	138	138 side transferred to MISO functional control	
FELDMAN	OH	138	138	138 side transferred to MISO functional control	
FINNEYTOWN	OH	138	138	138 side transferred to MISO functional control	
FORD BATAVIA	OH	138	138	138 side transferred to MISO functional control	
FOSTER	OH	345	138		
GOLF MANOR	OH	138	138	138 side transferred to MISO functional control	
HALL	OH	138	138	138 side transferred to MISO functional control	
HENKEL	OH	138	138	138 side transferred to MISO functional control	
HILLCREST	OH	345	138		
KEMPER	OH	138	138	138 side transferred to MISO functional control	
KLEEMAN	OH	138	138	138 side transferred to MISO functional control	
LATERAL	OH	138	138	138 side transferred to MISO functional control	
MAINEVILLE	OH	138	138	138 side transferred to MISO functional control	
MAPLEKNOLL	OH	138	138	138 side transferred to MISO functional control	

**Transmission Owner: Duke Energy Business Services, LLC  
Transmission Facilities Transferred to The Midwest ISO's Functional Control  
June 2009**

**Substations**

Substation Name	State	Max kV	Min kV	Sub ID (optional)	Comments
METRO SEWER	OH	138	138	138 side transferred to MISO functional control	
MIAMI FORT	OH	345	138		
MIAMI FORT GT	OH	138	138	138 side transferred to MISO functional control	
MIDWAY	OH	138	138	138 side transferred to MISO functional control	
MILLIKIN	OH	138	138	138 side transferred to MISO functional control	
MITCHELL	OH	138	138	138 side transferred to MISO functional control	
MONTGOMERY	OH	138	138	138 side transferred to MISO functional control	
MORGAN	OH	138	138	138 side transferred to MISO functional control	
MOUNT HEALTHY	OH	138	138	138 side transferred to MISO functional control	
MULHAUSER	OH	138	138	138 side transferred to MISO functional control	
NEWTOWN	OH	138	138	138 side transferred to MISO functional control	
NICKEL	OH	138	138	138 side transferred to MISO functional control	
OAKLEY	OH	138	138	138 side transferred to MISO functional control	
OBANNONVILLE	OH	138	138	138 side transferred to MISO functional control	
PARK	OH	138	138	138 side transferred to MISO functional control	
PIERCE	OH	345	138	Tie w/ OVEC through banks A, B and TB18	
PORT UNION	OH	345	138		
QUEENSGATE	OH	138	138	138 side transferred to MISO functional control	
RED BANK	OH	345	138		
REMINGTON	OH	138	138	138 side transferred to MISO functional control	
ROCHELLE	OH	138	138	138 side transferred to MISO functional control	
ROCKIES EXPRESS	OH	138	138	138 side transferred to MISO functional control	
SCP EASTWOOD	OH	138	138	138 side transferred to MISO functional control	
SEWARD	OH	138	138	138 side transferred to MISO functional control	
SHAKER RUN	OH	138	138	138 side transferred to MISO functional control	
SIMPSON	OH	138	138	138 side transferred to MISO functional control	
SOCIALVILLE	OH	138	138	138 side transferred to MISO functional control	

**Transmission Owner: Duke Energy Business Services, LLC**  
**Transmission Facilities Transferred to The Midwest ISO's Functional Control**  
**June 2009**

**Substations**

Substation Name	State	Max kV	Min kV	Sub ID (optional)	Comments
SUMMERSIDE	OH	138	138	138 side transferred to MISO functional control	
TERMINAL	OH	345	138		
TOBASCO	OH	138	138	138 side transferred to MISO functional control	
TODHUNTER	OH	345	138		
TRENTON	OH	138	138	138 side transferred to MISO functional control	
TWENTY MILE	OH	138	138	138 side transferred to MISO functional control	
UNION	OH	138	138	138 side transferred to MISO functional control	
WARDS CORNER	OH	138	138	138 side transferred to MISO functional control	
WARREN	OH	138	138	138 side transferred to MISO functional control	
WEST END	OH	138	138	138 side transferred to MISO functional control	
WILLEY	OH	138	138	138 side transferred to MISO functional control	
WOODSDALE	OH	345	345		
ZIMMER	OH	345	345		
Indiana facilities filed on behalf of IMPA and WVPA to include facilities owned by IMPA and WVPA as joint owners of the Joint Transmission System but operated and maintained by Duke Energy Indiana.					

**Transmission Owner: Duke Energy Business Services, LLC**  
**Transmission Facilities Transferred to The Midwest ISO's Functional Control**  
**June 2009**

**Transformers**

Substation Name	Transformer ID	High Side kV	Low Side kV	MVA	Comments
BUFFINGTON	TB #45	345	138	400	
BUFFINGTON	TB #46	345	138	400	
FOSTER	TB #11	345	138	400	
HILLCREST	TB #21	345	138	400	
MIAMI FORT	TB #9	345	138	400	
MIAMI FORT	TB #10	345	138	400	
PIERCE	TB A	345	138	125	
PIERCE	TB B	345	138	125	
PIERCE	TB 18	345	138	400	
PORT UNION	TB #19	345	138	400	
PORT UNION	TB #20	345	138	400	
RED BANK	TB #27	345	138	400	
RED BANK	TB #28	345	138	400	
SILVER GROVE	TB #23	345	138	400	
TERMINAL	TB #11	345	138	400	
TERMINAL	TB #12	345	138	400	
TODHUNTER	TB #15	345	138	400	
TODHUNTER	TB #16	345	138	400	
TODHUNTER	TB #17	345	138	400	
BATESVILLE 345kV	BK 3	345	138	672	
BEDFORD	BK5	345	138	448	
BEDFORD	BK7	345	138	448	
BLOOMINGTON 230	BK1	230	138	120	
CAYUGA STATION	BK 9	345	230	350	
CAYUGA STATION	BK10	345	230	392	
COLUMBUS 345kV	BK1	230	69	40	
COLUMBUS 345kV	BK2	230	69	40	
COLUMBUS 345kV	BK3	230	69	40	
COLUMBUS 345kV	BK 5	345	230	560	
DRESSER 345	BK1	345	138	448	
DRESSER 345	BK2	345	138	450	
FIVE POINTS	BK1	230	138	180	
FIVE POINTS	BK2	230	138	180	
GALLAGHER STA	BK 10	230	138	300	
GIBSON STATION	BK 9	345	138	280	
GREENSBORO 345	BK1	345	138	448	
GREENTOWN 765	BK 1	765	138	672	
GREENTOWN 765	BK 2	765	138	1401	
KOKOMO HIGHLAND PK	BK 4	230	69	50	
KOKOMO HIGHLAND PK	BK 5	230	69	50	
KOKOMO HIGHLAND PK	BK 6	230	69	50	
KOKOMO HIGHLAND PK	BK 8	230	138	224	
LAFAYETTE 230	BK 1	230	138	180	
LAFAYETTE 230	BK 4	230	138	224	
NOBLESVILLE STA	BK 7	230	138	112	
NOBLESVILLE STA	BK 11	345	230	392	

**Transmission Owner: Duke Energy Business Services, LLC**  
**Transmission Facilities Transferred to The Midwest ISO's Functional Control**  
**June 2009**

**Transformers**

Substation Name	Transformer ID	High Side kV	Low Side kV	MVA	Comments
SPEED 345	BK 3	345	138	448	
STAUNTON 230	BK1	230	138	134.4	
STAUNTON 230	BK2	230	138	134.4	
WABASH RIVER STA.	BK 9	230	138	60	
WABASH RIVER STA.	BK 10A	230	138	60	
WABASH RIVER STA.	BK 10B	230	138	201.6	
WALTON 345	BK 2	345	230	560	
WESTWOOD 345	BK1	345	138	336	
WESTWOOD 345	BK2	345	138	400	

**Transmission Owner: Duke Energy Business Services, LLC**  
**Transmission Facilities Transferred to The Midwest ISO's Functional Control**  
**June 2009**

**Transmission Lines** (Lines must be listed as individual branches between substations. Line Mileages are required for Cost Allocation)

From Substation	To Substation	kV	Circuit ID	Length (miles) <sup>1</sup>	State	Line ID (optional)	Segment # (Optional)	Comments (tie line or joint ownership)
Pierce (OVEC)	Beckjord	345	4501			CCD		Tie w/OVEC, CCD
Foster	Pierce (OVEC)	345	4502			CCD		Tie w/OVEC, CCD
Miami Fort	Tanners Creek (AEP)	345	4504			DEO/AEP		Tie W/AEP
Foster	Port Union	345	4508			DEO		
Hillcrest	Stuart (DPL)	345	4511			DEO		Tie w/DPL
East Bend	Tanners Creek (AEP)	345	4512			DEO/AEP		Tie W/AEP
Port Union	Terminal	345	4513			DEO		
Miami Fort	Terminal	345	4514			DEO		
Foster	Todhunter	345	4515			DEO		
East Bend	Terminal	345	4516			DEO		
Foster	Sugar Creek (DPL)	345	4524			CD		Tie w/DPL, CD line
Zimmer	Spurlock (EKPC)	345	4541			CCD		Tie w/EKPC, CCD line
Port Union	Zimmer	345	4544			CCD		CCD line
Red Bank	Zimmer	345	4545			CCD		CCD line
Red Bank	Terminal	345	4546			CCD		CCD line
Todhunter	Woodsdale	345	4561			CD		CD line
Todhunter	Woodsdale	345	4562			DEO		
Miami Fort	West Milton (DPL)	345	4591			CD		Tie w/DPL, CD line
Miami Fort	Woodsdale	345	4592			CD		CD line
Woodsdale	Madison	345	4599			DEO		
Foster	Hillcrest	345	34569			CCD		CCD line
Foster	Bath (DPL)	345	34598			CD		Tie w/DPL, CD line
Elmood	Lateral	138	684			DEO		
Elmood	Terminal	138	689			DEO		
Oakley	Red Bank	138	885			DEO		
Oakley	Beckjord	138	886			DEO		
Mitchell	Terminal	138	1284			DEO		
West End	Mitchell	138	1286			DEO		
Ashland	Mitchell	138	1288			DEO		
Charles	West End	138	1385			DEO		UG
Charles	West End	138	1389			DEO		UG



**Transmission Owner: Duke Energy Business Services, LLC**  
**Transmission Facilities Transferred to The Midwest ISO's Functional Control**  
**June 2009**

**Transmission Lines** (Lines must be listed as individual branches between substations. Line Mileages are required for Cost Allocation)

From Substation	To Substation	kV	Circuit ID	Length (miles) <sup>1</sup>	State	Line ID (optional)	Segment # (Optional)	Comments (tie line or joint ownership)
Crescent	West End	138	1587			DEO		
Greendale	Miami Fort	138	1681			DEO		
Clifty Creek (OVEC)	Miami Fort	138	1682			DEO/OVEC		Tie w/LGEE, OVEC
Miami Fort	Miami Fort	138	1688			DEO		
Miami Fort	Morgan	138	1689			DEO		
Glenview	Terminal	138	1782			DEO		
Ebenzer	Terminal	138	1783			DEO		
Silver Grove	Beckjord	138	1880			DEO		
Beckjord	Wilder	138	1881			DEO		
Red Bank	Beckjord	138	1883			DEO		
Tobasco	Beckjord	138	1885			DEO		
Pierce	Beckjord	138	1887			DEO		
Pierce	Beckjord	138	1889			DEO		
Warren	Hillsboro (AEP)	138	2381			DEO/AEP		Tie W/AEP, DEO owns Warren-Clinton, AEP owns Clinton-Hillsboro
Cedarville	Ford Batavia	138	2986			DEO		
College Corner (AEP)	Trenton	138	3281			DEO		Tie w/AEP
Todhunter	Trenton	138	3284			DEO		
Port Union	Summerside	138	3881			DEO		
Fairfield	Port Union	138	3885			DEO		
Port Union	Willey	138	3886			DEO		
Port Union	Todhunter	138	3887			DEO		
Port Union	Todhunter	138	3888			DEO		
City of Hamilton 138	Port Union	138	3889			DEO		
Lateral	Red Bank	138	4187			DEO		
Evendale	Port Union	138	4683			DEO		
Evendale	Terminal	138	4685			DEO		
Port Union	Foster	138	5483			DEO		
Foster	Warren	138	5484			DEO		
Foster	Shaker Run	138	5485			DEO		
Foster	Remington	138	5487			DEO		

**Transmission Owner: Duke Energy Business Services, LLC**  
**Transmission Facilities Transferred to The Midwest ISO's Functional Control**  
**June 2009**

**Transmission Lines** (Lines must be listed as individual branches between substations. Line Mileages are required for Cost Allocation)

From Substation	To Substation	kV	Circuit ID	Length (miles) <sup>1</sup>	State	Line ID (optional)	Segment # (Optional)	Comments (tie line or joint ownership)
Cedarville	Foster	138	5489			DEO		
Todhunter	Warren	138	5680			DEO		
Armco	Todhunter	138	5682			DEO		
Armco	Dicks Creek	138	5686			DEO		
Shaker Run	Todhunter	138	5689			DEO		
City of Hamilton 138	Fairfield	138	5781			DEO		
Fairfield	Morgan	138	5783			DEO		
Brown	Eastwood	138	5884			DEO		
Brown	Stuart (DPL)	138	5886			DEO		Tie w/DPL
Silver Grove	Wilder	138	5983			DEO		
West End	Wilder	138	5985			DEO		
Silver Grove	Wilder	138	5987			DEO		
Beckjord	Wilder	138	5988			DEO		
Buffington	Silver Grove	138	6282			DEO		
Buffington	Crescent	138	6782			DEO		
Buffington	Boone (EKPC)	138	6785			DEO/EKPC		Tie w/EKPC
Ebenzer	Miami Fort	138	6885			DEO		
Summerside	Beckjord	138	6984			DEO		
Miami Fort	Crescent	138	7086			DEO		
Glenview	Miami Fort	138	7284			DEO		
Red Bank	Terminal	138	7481			DEO		
Ashland	Red Bank	138	7484			DEO		UG to Oakley
Red Bank	Tobasco	138	7489			DEO		
Charles	Rochelle	138	8283			DEO		UG
Rochelle	Terminal	138	8286			DEO		UG to Greendale
Eastwood	Ford Batavia	138	8481			DEO		
Hillcrest	Eastwood	138	8887			DEO		
Beckjord	Remington	138	9482			DEO		
Miami Fort	Willey	138	9784			DEO		
Terminal	Willey	138	9787			DEO		
Cayuga Sta	Nucor	345	34501			WVPA		WVPA owned.

**Transmission Owner: Duke Energy Business Services, LLC**  
**Transmission Facilities Transferred to The Midwest ISO's Functional Control**  
**June 2009**

**Transmission Lines** (Lines must be listed as individual branches between substations. Line Mileages are required for Cost Allocation)

From Substation	To Substation	kV	Circuit ID	Length (miles) <sup>1</sup>	State	Line ID (optional)	Segment # (Optional)	Comments (tie line or joint ownership)
Cayuga 345KV Sub.	AEP Eugene	345	34502			DEI		Tie line with IPL, IPL owns line
Whitestown	Guion Road (IP&L)	345	34503			IPL		IPL owns and maintains line but DEI operates it.
Hortonville	Whitestown	345	34504			DEI		Tie line with AEP
Westwood	Dequine (AEP)	345	34505			DEI		
Gibson Sta	Bedford 345	345	34506			DEI/WVPA		WVPA owns the "tap" into Petersburg. Tie with IPL
Gibson Sta	Petersburg - (IP&L)	345	34507			DEI		
Gibson Sta	Wheatland	345	34508			DEI		
Gibson Sta	Albion (AMRN)	345	34509			(to state line)		Tie with Ameren, DEI owns to state line
Batesville	Ghent (LGEE)	345	34510			DEI		Tie with LGEE
Gibson Sta	Merom (HED)	345	34511			DEI		Tie with HED
Sugar Creek	Cayuga CT	345	34513			IMPA		IMPA owned line
Gwynneville	Prescott	345	34515			IPL		IPL owns and maintains line but DEI operates it.
Gibson Sta	Vectren Francisco	345	34516			DEI		
Bedford	Columbus	345	34517			DEI		
Walton	Leesburg (NIPSCO)	345	34518			(to 13 mi north of Deedsville)		Tie with NIPSCO, DEI owns to 13 mi north of Deedsville
						IPL		Tie line with AEP. IPL owns and maintains line but DEI operates it.
Noblesville	Fall Creek (AEP)	345	34519			IMPA		IMPA owned line
Merom	Dresser	345	34520			DEI/WVPA		WVPA owns the "tap" into Petersburg. Tie with IPL
Bedford	Petersburg (IP&L)	345	34521			IMPA		IMPA owned line
Greensboro	Gwynneville	345	34522			IPL		IPL owns line. Tie with IPL at
Gwynneville	Sunnyside (IP&L)	345	34523			DEI		
Qualitech	Whitestown	345	34524			DEI		

**Transmission Owner: Duke Energy Business Services, LLC**  
**Transmission Facilities Transferred to The Midwest ISO's Functional Control**  
**June 2009**

<b>Transmission Lines</b> (Lines must be listed as individual branches between substations. Line Mileages are required for Cost Allocation)								
From Substation	To Substation	kV	Circuit ID	Length (miles) <sup>1</sup>	State	Line ID (optional)	Segment # (Optional)	Comments (tie line or joint ownership)
Nucor	Whitestown	345	34526			WVPA		IPL owns 5 miles @ Whitestown end. WVPA owns remainder
Hortonville	Noblesville	345	34527			IPL		IPL owns and maintains line but DEI operates it.
Wheatland	Amo	345	34528			DEI		
Westwood	AEP Dequine	345	34529			DEI		Westwood #2 Tie line with AEP
Speed	Ghent (LGEE)	345	34530			DEI		Tie with LGEE
Amo	Qualitech	345	34531			DEI		
Cayuga	Cayuga CT	345	34533			IMPA		IMPA owned line
Cayuga 345KV Sub.	Vermillion	345	34535			DEI		
Columbus	Prescott	345	34536			IPL		IPL owns and maintains line but DEI operates it.
Vectren Francisco	Vectren Duff	345	34537			DEI		
Dresser	Sugar Creek	345	34538			IMPA		IMPA owned line
Vectren Duff	Speed	345	34539			DEI		
Wabash River	Whitesville South	230	23001			DEI		
Wabash River Station	Staunton	230	23002			DEI		
Clinton 230	Cayuga	230	23003			DEI		
Gallagher Station	Columbus	230	23004			DEI		
Gallagher Station	Columbus	230	23005			DEI		
Columbus	Franklin	230	23006			DEI		
Geist	Noblesville	230	23007			DEI		
Noblesville Station	Tipton West	230	23008			DEI		
Kokomo H.P.	New London Sw. Sta.	230	23009			DEI		
Frankfort	New London	230	23010			WVPA		WVPA owned line.
Cayuga	Veedersburg West	230	23011			DEI		
Cayuga	Frankfort	230	23013			WVPA		WVPA owned line.
Lafayette 230	New London	230	23015			DEI		
New London	Kokomo Webster St.	230	23016			DEI		
Staunton	Bloomington 230 KV	230	23017			DEI		
Bloomington 230	Columbus Denois Cr	230	23018			DEI		

**Transmission Owner: Duke Energy Business Services, LLC**  
**Transmission Facilities Transferred to The Midwest ISO's Functional Control**  
**June 2009**

**Transmission Lines** (Lines must be listed as individual branches between substations. Line Mileages are required for Cost Allocation)

From Substation	To Substation	kV	Circuit ID	Length (miles) <sup>1</sup>	State	Line ID (optional)	Segment # (Optional)	Comments (tie line or joint ownership)
Columbus	Greenwood Clark Twp.	230	23019			DEI		
Kokomo Webster St.	Walton	230	23020			DEI		
Greentown	Walton.	230	23021			IMPA		IMPA owned line
Greentown	Kokomo Webster St	230	23022			WVPA		WVPA owned line.
Walton	Logansport South	230	23023			DEI		
Wabash River Sta	Clinton 230	230	23025			DEI		
Greenwood Clark Twp.	Five Points	230	23026			DEI		
Lafayette 230	Veedersburg West	230	23027			DEI		
Kokomo Highland Park	Whitesville South	230	23028			DEI		
Franklin	Five Points	230	23029			DEI		
Five Points	Geist	230	23030			DEI		
Columbus Denois Cr	Columbus 345	230	23031			DEI		
Tipton West	Kokomo Highland Park	230	23032			DEI		
Staunton	Cloverdale	138	13801			DEI		
Staunton	Greencastle Jct. 1	138	13802			DEI		
Five Points	Shelbyville Northeast	138	13803			DEI		
Five Points	Mohawk	138	13804			DEI		
New Castle	Fall Creek (AEP)	138	13805			DEI		Tie with AEP.
Lafayette 230	Westwood	138	13806			DEI		
Springboro	Monticello (NIPSCO)	138	13807			DEI		Tie with NIPSCO
Lafayette Southeast	Westwood	138	13808			DEI		
Five Points	Southeast (IP&L)	138	13809			DEI		Tie with IPL.
Kokomo Delco	Greentown 765	138	13810			DEI		
Kokomo Chrysler South	Greentown 765	138	13811			DEI		
Plainfield South	Five Points	138	13813			DEI		
Vincennes	Lawrenceville (AMRN)	138	13815			DEI		Tie with Ameren.
Wabash	Huntington Riverfork	138	13816			DEI		
Huntington	Huntington Jct. (AEP)	138	13817			DEI		Tie with AEP.
Lafayette 230	Lafayette Caterpillar	138	13818			DEI		
Lafayette Southeast	Crawfordsville	138	13819			DEI		
Lafayette Caterpillar	Westwood	138	13820			DEI		

**Transmission Owner: Duke Energy Business Services, LLC**  
**Transmission Facilities Transferred to The Midwest ISO's Functional Control**  
**June 2009**

**Transmission Lines** (Lines must be listed as individual branches between substations. Line Mileages are required for Cost Allocation)

From Substation	To Substation	kV	Circuit ID	Length (miles) <sup>1</sup>	State	Line ID (optional)	Segment # (Optional)	Comments (tie line or joint ownership)
TH Pfizer Jct.	Worthington (HED), Linton	138	13821			DEI		Tie with HE
Gallagher	Bedford	138	13822			DEI		
Edwardsport	Bedford	138	13823			DEI		
Edwardsport	HE Georgetown	138	13824			DEI		
Vincennes	Petersburg (IP&L), Wash. Mun 10th St.	138	13825			DEI/IMPA		(Tie w/IPL.), IMPA owns Wash. 10th St to Vincennes Jct.
Oakland City	Francisco (VECTREN)	138	13826			Vectren		Tie with Vectren at Oakland City
Gallagher	Paddy's West (LGEE)	138	13827			DEI		Tie with LG&E.
Madison	North Vernon	138	13828			DEI		
Bedford	Seymour	138	13829			DEI		
Columbus	Seymour	138	13830			DEI		
Batesville	Columbus	138	13831			DEI		
Hubbell (HE)	Miami Ft. (CG&E), Wilmington	138	13832			DEI		
Connersville	Batesville	138	13833			DEI		
Connersville	New Castle	138	13835			DEI		
Bloomington 230	Bloomington Rogers St.	138	13836			DEI		
Bedford	Bloomington Rogers St.	138	13837			DEI		
Oakland City	Petersburg (IP&L)	138	13838			DEI		Tie with IPL.
Batesville	Napoleon (HED)	138	13839			DEI		Tie with HE.
Bedford	Worthington (HED)	138	13840			DEI		Tie with HE
Henry Co. CT	New Castle	138	13842			DEI		
New Castle	Chrysler	138	13843			DEI		
Crawfordsville	Crawfordsville Municipal	138	13844			IMPA		IMPA owned line
Wabash River Sta	Terre Haute Water St	138	13845			DEI		
Wabash River Sta	Crawfordsville	138	13846			DEI		
Wabash River Sta	Terre Haute East	138	13847			DEI		
Wabash	Greentown	138	13848			DEI		
Cadiz 138kV	Anderson South CT.	138	13849			DEI		
Gallagher Sta	New Albany, Speed	138	13850			DEI		
Seymour	North Vernon	138	13851			DEI		

**Transmission Owner: Duke Energy Business Services, LLC**  
**Transmission Facilities Transferred to The Midwest ISO's Functional Control**  
**June 2009**

<b>Transmission Lines</b> (Lines must be listed as individual branches between substations. Line Mileages are required for Cost Allocation)								
From Substation	To Substation	kV	Circuit ID	Length (miles) <sup>1</sup>	State	Line ID (optional)	Segment # (Optional)	Comments (tie line or joint ownership)
Gallagher	New Albany	138	13852			DEI		
Madison	Fairview	138	13854			DEI		
Fairview	Ghent (LGEE)	138	13855			DEI (to state line) DEI/IMPA		Tie with LG&E. DEI owns to state line IMPA owns Wash. 10th St to Wash. Mun. Jct.
Edwardsport	Washington Mun, Linton	138	13856			DEI		
Madison West	Speed	138	13857			DEI		
Fairview, Markland Sta	Wilmington	138	13858			DEI		
Dresser	Terre Haute East	138	13859			DEI		
Edwardsport	Vincennes	138	13860			DEI		
Dresser	Staunton	138	13861			DEI		
Oakland City	Old Ben Coal	138	13862			DEI		
Gibson Sta	HE Owensville	138	13863			DEI		
Batesville	Hubbell (HE)	138	13864			DEI		
HE Decatur Co Sw Sta	Shelbyville Northeast	138	13865			DEI		
Gallagher Sta	Clarksville	138	13866			DEI		
Cloverdale	Plainfield South	138	13867			DEI		
Dresser	Terre Haute Water Street	138	13868			WVPA		WVPA owned line
Carmel SE Jct (IPL)	Carmel SE	138	13870			DEI		
Bedford	Bloomington Rogers St.	138	13871			DEI		
Greenfield Hastings Park	Mohawk	138	13872			DEI		
Greensboro	New Castle 138	138	13873			DEI		
Greensburg	Batesville	138	13874			DEI		
Crawfordsville 138	Big 4 Arch. Rd.(Crawfordsville	138	13875			IMPA		IMPA owned line
Lafayette 230	Lafayette Concord Rd.	138	13876			DEI		
Lafayette 230	Lafayette Subaru Isuzu	138	13877			DEI		
Lafayette Subaru Isuzu	Lafayette S.E.	138	13878			DEI		
Kokomo H.P	Kokomo Chrysler South	138	13879			DEI		
Seymour	Seymour Industrial Park	138	13880			DEI		
Speed	North Side (LGEE)	138	13881			DEI		Tie with LG&E.

**Transmission Owner: Duke Energy Business Services, LLC**  
**Transmission Facilities Transferred to The Midwest ISO's Functional Control**  
**June 2009**

<b>Transmission Lines</b> (Lines must be listed as individual branches between substations. Line Mileages are required for Cost Allocation)								
From Substation	To Substation	kV	Circuit ID	Length (miles) <sup>1</sup>	State	Line ID (optional)	Segment # (Optional)	Comments (tie line or joint ownership)
Jeffersonville 138	Northside - Beargrass (LGEE)	138	13882			DEI		Tie with LG&E.
Westwood	South Prairie (NIPSCO)	138	13883			DEI		Tie with NIPSCO.
Huntington	Huntington Riverfork	138	13884			DEI		
HE Georgetown	Gallagher Sta	138	13885			DEI		
Anderson South CT	Noblesville Sta	138	13886			DEI		
Kokomo Highland Park	Kokomo Delco	138	13887			DEI		
Pfizer Jct.	Dresser	138	13888			DEI		
Henry Co. CT	Cadiz	138	13889			DEI		
Clarksville	Jeffersonville 138	138	13890			DEI		
Lafayette 230	Springboro	138	13891			DEI		
Madison	Scottsburg	138	13892			WVPA		WVPA owned line
Cloverdale	Cloverdale Industrial	138	13893			DEI		
Greenfield Hastings Park	Greensboro	138	13894			DEI		
HE Owensville	Oakland City	138	13895			DEI		
Greensburg	HE Decatur Co Sw Sta	138	13896			DEI		
Footnote 1 - Line mileages submitted to MISO as part of annual MTEP process and were based on powerflow bus names and powerflow bus to bus segments and so are not included here.								
CCD = facilities jointly owned by AEP, DEO and Dayton Power & Light								
CD = facilities jointly owned by DEO and Dayton Power & Light								
Indiana facilities filed on behalf of IMPA and WVPA to include facilities owned by IMPA and WVPA as joint owners of the Joint Transmission System but operated and maintained by Duke Energy Indiana.								
DEO = Duke Energy Ohio								
DEI = Duke Energy Indiana								