

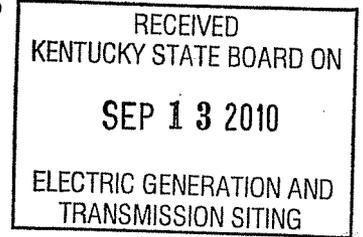
COMMONWEALTH OF KENTUCKY

BEFORE THE KENTUCKY STATE BOARD ON
ELECTRIC GENERATION AND TRANSMISSION SITING

In the Matter of:

APPLICATION OF SOUTHERN INDIANA)
GAS & ELECTRIC CO., D/B/A VECTREN)
ENERGY DELIVERY OF INDIANA, INC.)
FOR A CONSTRUCTION CERTIFICATE TO)
CONSTRUCT AN ELECTRIC TRANSMISSION)
LINE FROM ITS A.B. BROWN PLANT TO THE)
BIG RIVERS EHV STATION)

CASE NO.
2010-00223



HENDERSON MUNICIPAL POWER & LIGHT RESPONSE
TO VECTREN'S FIRST DATA REQUEST

Comes Henderson Municipal Power & Light (hereinafter referred to as "HMP&L"), by counsel, and for its Response to Vectren's (9/1/2010) Data Request states as follows:

1. Please produce a copy of any long range plans, expansion plans or consulting agreements the scope of work of which requests preparation of same, for the Henderson Municipal Power & Light (HMPL) Substation 4 and vicinity.

Response: The construction of Henderson Municipal Power & Light's (HMP&L) Substation 4 began in 1981 and it has remained in service since that time. Substation 4 is the primary substation for HMP&L and it provides electric service to the citizens of Henderson. HMP&L's Station Two Power Plant provides service over an existing 161kV transmission line to Substation 4 which distributes the power to the other HMP&L substations for the use of the citizens of Henderson, Kentucky. When a new commercial or industrial customer locates within HMP&L's utility service area, the expansion of

Substation 4 may be required. This projection is based on the existing capacity of Substation 4 and the peak loads placed on the said substation. If an existing commercial or industrial customer elected to expand a business requiring a high electric consumption, expansion of Substation 4 may be required.

Economic Development and/or recruitment of industry is directly affected by the ability of HMP&L to provide low cost, efficient, utility service to both prospective and current customers. Expansion is reasonably expected and would require HMP&L to utilize its existing public property around the substation which Vectren's proposed route crosses for the construction of new facilities.

HMP&L does not currently have consultants engaged to design the expansion of Substation 4. The proposed route Applicant has selected to cross the Substation 4 property not only prevents future expansion of the Substation, it also places the entire Substation at risk for a catastrophic failure and outage. In 1981, Substation 4 was sited and designed for future expansion. The equipment at Substation 4 is thirty years old and nearing its expected usage life. The age of such equipment assures the need to replace and/or refurbish the existing facility. Replacing and/or refurbishing such equipment requires the ability to move and/or relocate the Substation and transmission facilities within the public property owned by HMP&L and would result in additional cost and/or the significant adverse impacts on the ability to expand and maintain the existing facility under the proposed Vectren easement, if said construction could even be accomplished. Any activity or expansion, service or repair requires the usage of the existing HMP&L land surrounding Substation 4. Vectren's easement would prohibit such usage of the public property. Vectren can easily bypass the HMP&L public property as shown on

attached Exhibit 1. Why Vectren has chosen to angle their proposed route over and directly through the existing HMP&L facility and property has never been answered by Vectren officials and/or in their Application.

There are a host of better routes on adjoining properties for the Applicant's proposed 345kV transmission line. Those routes would bypass Substation 4. However, by siting the proposed line on Substation 4, it appears to HMP&L that Applicant is making a veiled attempt to prevent the future expansion of Substation 4 and therefore limit HMP&L's ability to serve present and future customers.

2. Please produce a copy of any long range plans, expansion plans or consulting agreements the scope of work of which anticipates or requests preparation of same for any other HMPL facility which HMPL asserts would be impacted (adversely or favorably) by the Brown-Reid project.

Response: HMP&L has not been given any final approved design or plan and profile drawings for the proposed Brown-Reid Project. HMP&L can not respond to this Data Request until the final approved design or plan and profile drawings are provided. Applicant has refused HMP&L's numerous requests for the required information.

3. Please list the names and qualifications of any experts or consultants engaged, retained, hired or otherwise involved in this matter and a synopsis of each such expert or consultant's expected testimony and any reports, studies, or other documentation which he or she will cite or upon which he or she will rely.

Response: HMP&L has not selected its experts and consultants as of this time. HMP&L will provide the requested information when the selection process is completed.

Person Responsible: Gary Quick

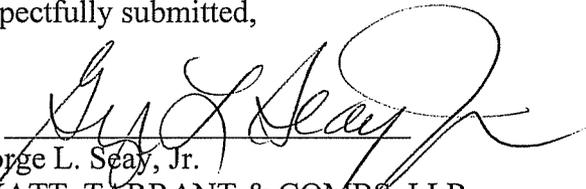
CERTIFICATE

I certify that the responses set out above are true and accurate to the best of my knowledge, information and belief, formed after reasonable inquiry.



Gary Quick, General Manager
Henderson Municipal Power & Light

Respectfully submitted,

By: 

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*Counsel for Henderson Municipal Power &
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CERTIFICATE OF SERVICE

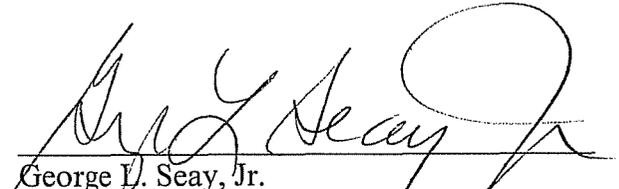
This is to certify that the original and ten true and correct copies of the foregoing has been served upon the following, by hand delivery, at the filing office of the Kentucky Public Service Commission, on this the 13th day of September, 2010:

Hon. Richard W. Bertelson, III
Counsel
Public Service Commission
211 Sower Blvd
P.O. Box 615
Frankfort, KY 40602-0615

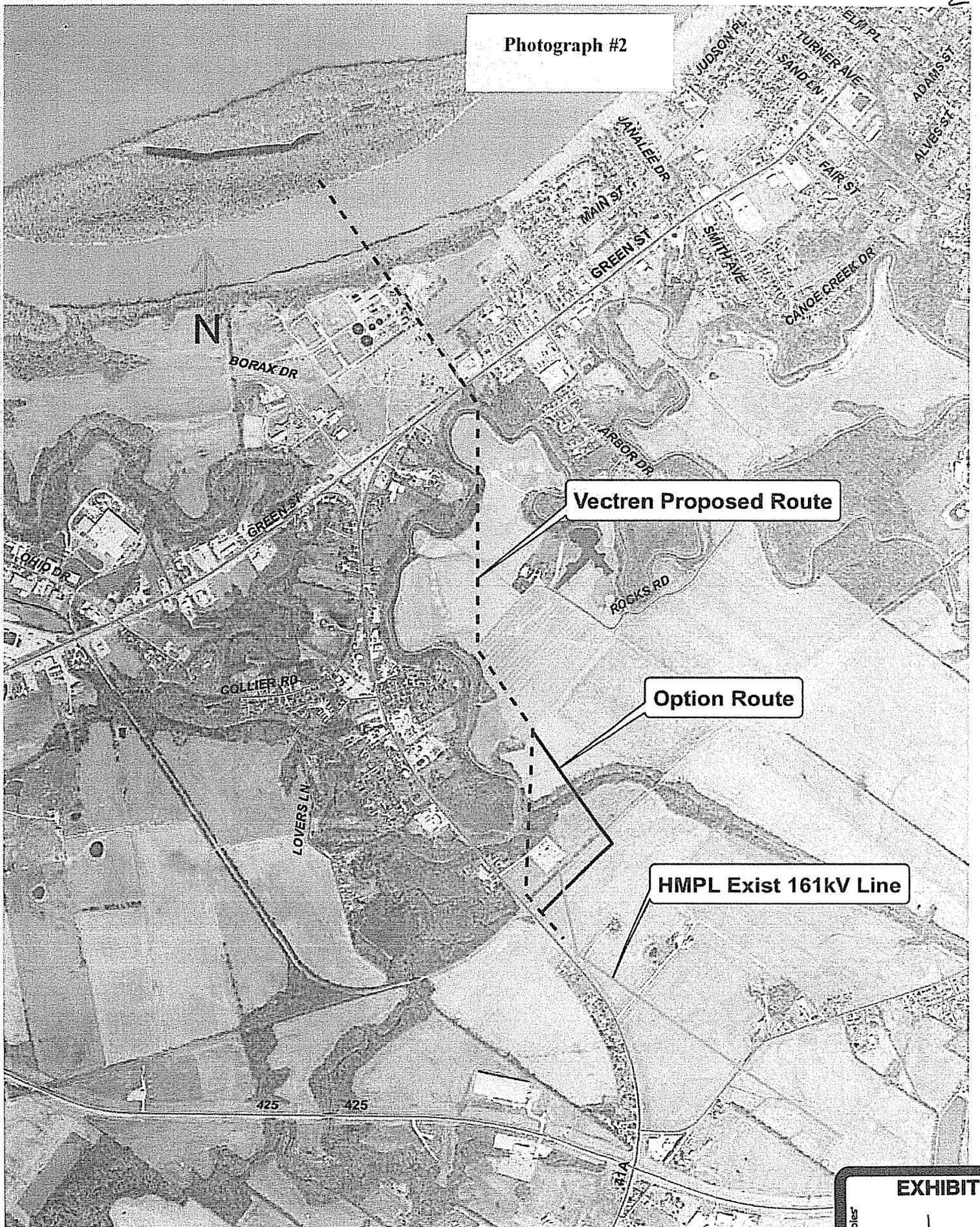
Mr. Jeff Derouen
Executive Director
Public Service Commission
P.O. Box 615
Frankfort, KY 40602

and via U.S. Mail, postage prepaid to:

Jason R. Bentley, Esq
McBRAYER, MCGINNIS, LESLIE & KIRKLAND, PLLC
201 East Main Street, Suite 1000
Lexington, KY 40507


George D. Seay, Jr.
Counsel for Henderson Municipal Power & Light

Photograph #2



Vectren Proposed Route

Option Route

HMPL Exist 161kV Line

EXHIBIT

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