

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF KENTUCKY)	
POWER COMPANY FOR A CERTIFICATE OF)	
PUBLIC CONVENIENCE AND NECESSITY TO)	CASE NO.
CONSTRUCT A 138 KV TRANSMISSION LINE)	2020-00062
AND ASSOCIATED FACILITIES IN PIKE AND)	
FLOYD COUNTIES, KENTUCKY)	

COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
TO KENTUCKY POWER COMPANY

Kentucky Power Company (Kentucky Power), pursuant to 807 KAR 5:001, is to file with the Commission an electronic version of the following information. The information requested herein is due on December 2, 2020. The Commission directs Kentucky Power to the Commission's March 16, 2020 and March 24, 2020 Orders in Case No. 2020-00085¹ regarding filings with the Commission. The Commission expects the original documents to be filed with the Commission within 30 days of the lifting of the current state of emergency. All responses in paper medium shall be appropriately bound, tabbed, and indexed. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the name of the witness responsible for responding to the questions related to the information provided. Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or

¹ Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC Mar. 16, 2020), Order at 5–6. Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC Mar. 24, 2020), Order at 1–3.

association or a governmental agency, be accompanied by a signed certification of the preparer or the person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Kentucky Power shall make timely amendment to any prior response if Kentucky Power obtains information that indicates the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which Kentucky Power fails or refuses to furnish all or part of the requested information, Kentucky Power shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, Kentucky Power shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to Response to Staff's First Request, Item 8h(2). The attachment for this response is missing from the filing. Provide a copy of the map referenced in the response as "KPCO_R_KPSC_1_8_Attachment4."

2. Refer to the Application, Exhibit 6: Proposed Route;² the Application, Exhibit 11: Parcel List and List Of Landowners within Right-of-Way and Filing Corridor; Kentucky Power's October 2020 Property Acquisition Report filed with the Commission on October 14, 2020, and Kentucky Power's November 2020 Property Acquisition Report filed with the Commission on November 4, 2020.

Of the five parcels that are identified in the October 2020 Property Acquisition Report as no longer required for right-of-way or construction, three appear on Exhibit 6 of the Application, as necessary. The three are (1) Richard E. and Annette Ray (Map Id. No. 34); (2) Appalachian Land Company (Map Id. No. 36); and (3) Appalachian Land Company (Map Id. No. 40). The seven newly identified parcels listed in the October 2020 Property Acquisition Report do not have a Parcel Reference (Map Id. Number) in Exhibit 2 of the Property Acquisition Report.

In the November 2020 Property Acquisition Report, Kentucky Power states that ongoing survey and title work demonstrated that Parcel 9 will not be affected by proposed route of the line or the required right-of-way. However, Exhibit 6 of the Application clearly shows the line crossing Parcel 9.

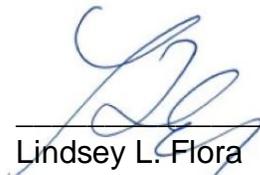
a. Provide an updated Exhibit 2 of the October Property Acquisition Report, including map identification numbers for the newly identified parcels.

² The legend of the map refers to it as "Exhibit 3: Proposed Route." However, the document is marked "Exhibit 6" in the upper right hand corner and the application, pages 7, 14, and 27 refer to the map as "Exhibit 6: Proposed Route (USGS and Ariel Base). In filing a revised map of the proposed route, Kentucky Power should make the necessary correction to the legend so that the map can be accurately referenced as Exhibit 6 of the application.

b. Provide a revised Exhibit 6 of the Application (map of proposed route) showing the current proposed route, and include all parcel references (Map Id. Number).

c. Provide an accurate updated Exhibit 11 of the Application (list of parcels and landowners within the right-of-way and filing corridor).

d. Explain the inconsistencies between Exhibit 6 of the Application and the October 2020 and November 2020 Property Acquisition Reports discussed above.



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DATED NOV 06 2020

cc: Parties of Record

Case No. 2020-00062

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