

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF DUKE ENERGY)	
KENTUCKY, INC. FOR A CERTIFICATE OF)	
PUBLIC CONVENIENCE AND NECESSITY TO)	CASE NO.
CONSTRUCT A 138-KV TRANSMISSION LINE)	2022-00364
AND ASSOCIATED FACILITIES IN BOONE)	
COUNTY, KENTUCKY)	

COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
TO DUKE ENERGY KENTUCKY, INC.

Duke Energy Kentucky, Inc. (Duke Kentucky), pursuant to 807 KAR 5:001E, shall file with the Commission an electronic version of the following information. The information requested is due on May 1, 2023. The Commission directs Duke Kentucky to the Commission's July 22, 2021 Order in Case No. 2020-00085¹ regarding filings with the Commission. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the question to which the response is made and 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 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

¹ Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC July 22, 2021), Order (in which the Commission ordered that for case filings made on and after March 16, 2020, filers are NOT required to file the original physical copies of the filings required by 807 KAR 5:001, Section 8).

response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Duke Kentucky shall make timely amendment to any prior response if Duke Kentucky obtains information that indicates the response was incorrect or incomplete when made or, though correct or complete when made, is now incorrect or incomplete in any material respect.

For any request to which Duke Kentucky fails or refuses to furnish all or part of the requested information, Duke Kentucky shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied and scanned 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, Duke Kentucky shall, in accordance with 807 KAR 5:001E, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to the Application, Exhibit 7, page 17. Provide information regarding the comment and virtual public meetings. Include how the public meeting was advertised, the attendance, and whether any information about the additional projects in the application were presented. Include a summary of each of the landowners' or interested persons' concerns that were raised at the meeting. Also, include any materials that were distributed or a PDF of any presentation materials.

2. Provide a written copy of any landowner comments or concerns with any portion of the proposed projects in the application. If not written, provide a summary of any verbal conversations with landowners.

3. Refer to Application, Exhibit 7, Section 3.5, pages 3.16-3.18. Explain, in greater detail, why Route R was not chosen as the preferred route considering the overall score appears to be the same as the chosen Route L.

4. Provide information about how many structure or cross-arm failures there have been on the current 69 kV transmission line in the last five years.

5. Provide the known number of buildings or other structures currently encroaching on the existing 69 kV transmission line.

6. Explain whether a structure encroaching in a transmission line right-of-way (ROW) is a violation of North American Electric Reliability Corporation (NERC) reliability standards.

7. Explain whether Duke Kentucky plans to file any additional Certificate of Public Convenience and Necessity (CPCN) applications for future transmission projects in the next 12 months. If yes, include whether the applications will be related to this project.

8. Provide the ROW widths for 138 kV and 69 kV transmission lines and explain whether the existing ROW is sufficient for collocating the 138 kV line with the rebuilt 69 kV line. Provide a citation to any safety regulation or industry-accepted best practice that supports the response.

9. Refer to Direct Testimony of Yanthi Boutwell (Boutwell Direct Testimony), page 7. Provide supporting documentation for the following conclusion, “[t]he Company

feels that it would be wasteful of resources and more impactful to the public to build the new facilities capable of operation at only 69 kV and then return in five or ten years and have to essentially completely rebuild the same facilities to upgrade to operation at 138 kV.”

10. Refer to Boutwell Direct Testimony, page 10. Provide supporting documentation supporting the conclusion that the ROW needs to be only 70 feet in certain circumstances.

11. Refer to Boutwell Direct Testimony, page 16. Duke Kentucky states that supplemental PJM projects are expansions of the system that do not address reliability criteria, but other needs. This need includes items like equipment condition, performance and risk, operational flexibility and efficiency, infrastructure resilience, and customer service. Duke Kentucky stated that this project is centered around customer service and meeting internal criteria.

a. Explain whether Duke Kentucky needs the project to address any of the other needs listed above besides customer service.

b. Explain whether Duke Kentucky could still provide reliable service to its territory currently, without the approval of this CPCN, and provide any supporting documentation including load forecasts

c. Explain in further detail how this project is labeled as a supplemental PJM project but is justified by Duke Kentucky’s internal criteria and does not require PJM’s review to determine if this project is needed.

12. Refer to Boutwell Direct Testimony, page 11. Confirm that the expense of a land acquisition vendor is included in the budget for the project. If not, explain why not.

13. Refer to the Application, Exhibits 1-3, Exhibit 7, Appendix A, Figure A-3, page 27 and Exhibit 14.

a. Provide an update to each of the listed Exhibits' maps identifying the circuit name, voltage and owner of all existing and proposed transmission lines and the service boundaries of Duke Kentucky and that of any other Kentucky neighboring electric utilities. Include in the response the anticipated East Kentucky Power Cooperative (EKPC) transmission line.

b. Confirm that all the substations shown in each listed Exhibit map is owned by Duke Kentucky. If not, identify the owner of each substation and provide an updated map for the corresponding exhibit containing the information.

14. Refer to the Application, Exhibits 1-3 and Exhibit 15, the Boutwell Direct Testimony, page 5 lines 8-23 and page 6, lines 1-7. Explain Duke Kentucky's plans for that portion of the existing 69 kV line running north from the Limaburg substation to the proposed interconnection point 138 kV line intersects the existing 69 kV line.

15. Refer to the Application, Exhibits 1-3 and Exhibit 15, the Boutwell Direct Testimony, pages 5- 6 and page 16.

a. Provide the PJM and Duke Kentucky transmission studies that identify any contingencies that will be cured by the proposed projects. Include in the response the "do-no-harm" analysis specifically referenced on Boutwell Direct Testimony, page 16.

b. Provide a map depicting the proposed project and include transmission lines and the Woodspoint and Aero and new Litton substations, as described by Boutwell Direct Testimony

c. Explain the types of equipment to be installed at the new Litton substation, the total estimated installation cost and why a CPCN for the new Litton substation was not included in the application.

16. Refer to the Application, Exhibit 3. Explain which of the 69 kV lines connecting to the Oakbrook substation are associated with the Buffington #6763 retirement project.

17. Refer to Exhibit 14 and Exhibit 15, and Boutwell Direct Testimony, page 6.

a. With the exception of the proposed project, explain what additional planned electrical infrastructure in the area surrounding the proposed project is Duke Kentucky planning to build and the expected timeline for these additional projects.

b. Explain in detail how the existing and planned electrical infrastructure in the area is not sufficient to serve the anticipated load without the addition of the proposed project. Include in the explanation the existing capacity of the 69 kV line, the anticipated line capacity deficit once the load growth materializes, and the sources of the anticipated load growth. Include all supporting forecasts, load studies and contracts for service to substantiate the answer.

18. Refer to the Application, Exhibit 14 and Exhibit 15, Boutwell Direct Testimony, page 4 and page 12.

a. Provide the remaining useful life of that portion of the Buffington #6763 circuit to be retired and explain if there are existing issues with that line segment other than the construction of the new proposed circuit that would warrant retirement as opposed to rebuild or repair.

b. For any distribution circuits along Buffington #6763, explain how they will be served once the line segment is retired.

c. Confirm that Duke Kentucky will relinquish its easements associated with the Buffington #6763 as part of the retirement project. If not, explain why not.

d. Explain the timeline for the Buffington #6763 retirement project and how it relates to the proposed project.

19. Confirm that Duke Kentucky is requesting to recover the entirety of the cost of this project in its rate case, Case No. 2022-00372.² If confirmed, provide justification for its inclusion based on an in-service date of 2025.



Linda C. Bridwell, PE
Executive Director
Public Service Commission
P.O. Box 615
Frankfort, KY 40602

DATED APR 19 2023

cc: Parties of Record

² Case No. 2022-00372, *Electronic Application of Duke Energy Kentucky, Inc. For (1) An Adjustment of Electric Rates; (2) Approval of New Tariffs; (3) Approval of Accounting Practices to Establish Regulatory Assets and Liabilities; and (4) All Other Required Approvals and Relief.* (Ky. PSC Dec. 14, 2022).

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