

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF EAST	)	
KENTUCKY POWER COOPERATIVE, INC. FOR	)	
AN AMENDMENT TO ITS CERTIFICATE OF	)	CASE NO.
PUBLIC CONVENIENCE AND NECESSITY FOR	)	2024-00263
THE CONSTRUCTION OF TRANSMISSION	)	
FACILITIES IN MADISON COUNTY, KENTUCKY	)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION  
TO EAST KENTUCKY POWER COOPERATIVE, INC.

East Kentucky Power Cooperative, Inc. (EKPC), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due on November 4, 2024. The Commission directs EKPC to the Commission's July 22, 2021 Order in Case No. 2020-00085<sup>1</sup> 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

---

<sup>1</sup> 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.

EKPC shall make timely amendment to any prior response if EKPC 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 EKPC fails or refuses to furnish all or part of the requested information, EKPC 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, EKPC shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Provide a map for the proposed amended transmission line route, anticipated easement and proposed switching station. On the map, identify each parcel of property affected by the project with corresponding identification of the property owner(s).

2. Provide a map for the entirety of the southern portion of the project affected by the proposed amendment. Including the line, easement and location approved to run to and from the switching station to the New Industrial Substation.

3. Refer to the map provided in response to Item 2 and identify each parcel of property affected by the project with corresponding identification of the property owner(s).

4. Refer to the Direct Testimony of Laura LeMaster (LeMaster Direct Testimony), unnumbered page, Application at PDF pages 20–23. Provide an update on the following:

a. Confirm an agreement has been reached with the property owner of the parcel of the proposed switching station. If not confirmed, explain the status of that negotiation. If an agreement has been reached, provide the lease or deed.

b. Confirm that an agreement has been reached with the property owner of the New Industrial Substation. If not confirmed, explain the status of that negotiation. If an agreement has been reached, provide the lease or deed.

c. Confirm that the owner of the original site of the switching station will still own the land over which this transmission line will run and, as a result, EKPC will need to negotiate an easement. If not confirmed, explain why not.

5. Refer to LeMaster Direct Testimony, unnumbered page, Application PDF pages 24–25.

a. Provide the specific estimate of costs is referenced in the Lemaster Direct Testimony.

b. Provide a breakdown of the expenses alleged to have increased for the entirety of the project including expenses for, but not limited to, property, labor and specific equipment.

c. Identify which items and amounts are attributable to the new proposed location of the switching station.

6. Refer to LeMaster Direct Testimony, unnumbered page, lines 1–9, Application PDF page 21. Explain further what aspects of the best engineering option / design changed between the original project and the current proposal that necessitates relocating the switching station.

7. Refer to the LeMaster Direct Testimony, unnumbered page, lines 10–13, Application, PDF page 21 and Attachment LL-3.

a. Using Attachment LL-3, provide a new exhibit on which the property belonging to the Ramseys is identified and state the reasons why the original site became unsuitable.

b. There is a parcel of land between the original and proposed switching station sites. Explain whether the property owner of this property was noticed of the change in location.

c. There is a parcel of land between the original and proposed switching station sites. Explain whether EKPC considered this property as a suitable location site switching station.

8. Refer to the LeMaster Direct Testimony unnumbered page, lines 14–23, Application PDF page 21; Application unnumbered page 22, lines 1–3; and Attachment

LL-3. Explain where the 138 kV to 69 kV transformer will be located. Show the proposed location in an updated Attachment LL-3.

9. Refer to the LeMaster Direct Testimony unnumbered page, Application, PDF page 22, line 5. Explain whether “substation” should read “switching station”.

10. Refer to the LeMaster Direct Testimony, Attachment LL-3.

a. Explain whether the portion of the 138 kV Route from the Certificate of Public Convenience and Necessity (CPCN) 138 kV Endpoint extending northwest to where the Amended 138 kV Route 1,700 Feet intersects the 138 kV Route will still be constructed under the current proposal to change the switching station location.

b. Explain whether the industrial substation will be connected to the switching station and if so, how.

11. Refer to LeMaster Direct Testimony, unnumbered page, Application at PDF page 22. Confirm that the property owner for the original proposed switching location is the same property owner for the proposed New Industrial Substation. If not confirmed, identify the two respective property owners and their respective portions of the project.

12. Refer to Attachment LL-1. Identify the costs eliminated by the proposed new location, if any.

13. Refer to Attachment LL-1. Confirm that the removal of old lines was an expense proposed in the original CPCN case. If not confirmed, explain why not.

14. Refer to Attachment LL-3. Provide an updated map similar in nature to this exhibit and identify the length of original CPCN transmission line to the CPCN endpoint, beginning at the intersection of the red line and green line on Exhibit LL-3.

15. Identify the length of the proposed transmission line from the intersection of the red line and the green line to the new proposed Switching Station.

a. The proposed route to the New Industrial Substation as referenced in the LeMaster Direct Testimony at unnumbered PDF page 22.

b. Length of the proposed transmission line from the proposed switching station location to the New Industrial Substation.



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

DATED   OCT 22 2024  

cc: Parties of Record

\*L. Allyson Honaker  
Honaker Law Office, PLLC  
1795 Alysheba Way  
Suite 1203  
Lexington, KENTUCKY 40509

\*Brittany H. Koenig  
Honaker Law Office, PLLC  
1795 Alysheba Way  
Suite 1203  
Lexington, KENTUCKY 40509

\*Greg Cecil  
East Kentucky Power Cooperative, Inc.  
4775 Lexington Road  
P. O. Box 707  
Winchester, KY 40392-0707

\*East Kentucky Power Cooperative, Inc.  
4775 Lexington Road  
P. O. Box 707  
Winchester, KY 40392-0707