

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 69KV TRANSMISSION LINES AND	)	2026-00184
ASSOCIATED TRANSMISSION GRID	)	
UPGRADES IN PIKE COUNTY, KENTUCKY	)	
(BREAKS-DORTON PROJECT)	)	

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

Kentucky Power Company (Kentucky Power), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due on October 21, 2026. The Commission directs Kentucky Power 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

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).

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 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 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 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, 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. Explain how Kentucky Power prioritizes the order in which to complete projects approved through the PJM Interconnection LLC (PJM) Regional Transmission Expansion Plan (RTEP) process.

2. In submitting a proposed route to the PJM RTEP process, explain the extent to which Kentucky Power evaluates different route segments for encroachments, any

environmentally sensitive areas, roads, landslide prone areas, right-of-way (ROW) outage risk or any other constraints.

3. Refer to Application, page 7, paragraphs 19–21. Explain if Kentucky Power plans to reutilize or otherwise recover its investment in the removed wooden structures and provide the remaining net book value of the removed structures.

4. Refer to Application, page 7, paragraph 23. For the years 2020 through 2025, provide the following by month for each year:

- a. Number of Outages and Duration of each outage;
- b. Number of Voltage Violations in the area of the proposed project and location for each;
- c. Number of Voltage Drops in the area of the proposed project and location for each.

5. Refer to Application, page 9, paragraphs 29–30. Paragraph 29 states the Supplemental Project need was reviewed but paragraph 30 states a Baseline Project review and identification number. State whether these are two different projects or if the projects were moved from supplemental to baseline.

6. Refer to Application, page 9, paragraph 32.
- a. Provide a breakdown of the specific cost components set forth in paragraph 32. Include, at a minimum, in that breakdown: labor, engineering estimates, transmission components by component, land acquisition, remediation.
 - b. For the five highest scoring alternatives, provide an identical cost component breakdown for each alternative.

c. Explain whether these estimates include consideration of the costs associated with identified encroachments.

d. Identify the contingency amount included for each cost category.

7. Refer to Application, page 9, paragraph 33. Based on the allocation methodology provided, provide Kentucky Power's share of the project's costs.

8. Refer to the Application, page 11, paragraph 38. Explain what is meant by "landowner input".

9. Refer to the Application, page 16, paragraphs 58–60. Provide any updates for environmental permitting or other studies performed or to be performed. Consider this a continuing request through the date of issuance of the final Order.

10. Refer to the Application, page 15, paragraph 54 and the Direct Testimony of Lerah Kahn (Kahn Direct Testimony), page 7. The application states the proposed project's construction timeline is approximately 28 months while the Kahn Direct Testimony states construction will take approximately 25 months. Provide an explanation for the difference in the estimated timelines.

11. Refer to the Direct Testimony of Nicolas Koehler (Koehler Direct Testimony), pages 6–7.

a. State whether Kentucky Power expects to present the modified project to PJM before construction of the project.

b. Explain whether the supplemental needs were ever presented in the Subregional RTEP Committee – Western region meetings other than the February 21, 2020 Needs Meeting referenced. If not, explain why the supplemental needs were not brought back for presentation at a Solutions Meeting.

c. State whether Kentucky Power received any stakeholder feedback on these supplemental needs, and if so, provide such feedback.

12. Refer to the Direct Testimony of Caleb McAllister (McAllister Direct Testimony), page 6.

a. Explain in detail the process of removing existing lines and removing stations for the Project including any other existing structures to be removed.

b. Explain the costs associated with the removal and decommissioning of the existing lines, stations, and structures, including the proposed use of helicopters, and whether all these associated costs are included in the estimated \$2.4 million for station removals and \$23.7 million for transmission line removals.

c. Explain what will happen to the existing ROW, or how Kentucky Power plans to utilize the existing ROW, that will no longer be used after completion of the proposed Project.

d. Explain any environmental remediation measures Kentucky Power plans to take with the existing ROW that will no longer be used.

e. Explain whether Kentucky Power plans to reutilize or reuse any existing lines or structures it plans to remove or decommission to offset costs associated with the project.

f. Provide any cost-mitigating measures Kentucky Power will utilize in removing or decommissioning existing lines, stations, or structures from the existing ROW proposed to be disused.

13. Refer to the McAllister Direct Testimony, pages 8–9, providing areas that require a ROW greater than 100 ft. Witness McAllister states these are typically long

spans that cause conductors to sway outside of the typical 100 ft ROW. Provide any factors other than length of the span that Kentucky Power considers when determining if a span could require a larger ROW.

14. Refer to the McAllister Direct Testimony, pages 8–9. State whether there are any spans Kentucky Power intends to clear less than the recommended 100 ft ROW range. If yes, provide a description of the span and an explanation for why that span has a lower ROW range.

15. Refer to the Direct Testimony of Emily Hartje (Hartje Direct Testimony), page 7, describing the methodology used in this proceeding.

a. Explain whether Kentucky Power has ever employed the siting methodology used in this application in any other previous applications before the Commission.

b. If known, provide a list of any other utilities in Kentucky utilizing this siting methodology.

c. Compare the various evaluation steps in the Electric Power Research Institute (EPRI) / Kentucky EPRI methodology to the “traditional and accepted multi-step methodology” employed by Kentucky Power.

16. Refer to Hartje Direct Testimony, page 15. Provide a copy of, or summary of, all public comments made at the public meetings, as part of the Outreach or received by Kentucky Power regarding this proposed project.

17. Refer to Hartje Direct Testimony, page 17. Confirm the landowners impacted by the modification have been notified of the modification in addition to the

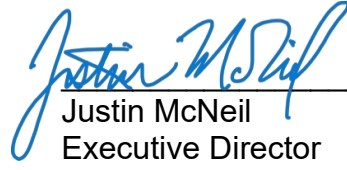
original public announcement. If confirmed, provide copies of all communications or notifications with the landowners.

18. State whether there are any existing encroachments, including habitable and non-habitable structures in the planned ROW.

19. Refer to the Application, page 14, paragraph 51. State whether all new and supplemental easements have been obtained.

20. If granted a Certificate of Public Convenience and Necessity (CPCN), state whether Kentucky Power will request a rate increase as a result of the project.

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Justin McNeil
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Public Service Commission
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DATED OCT 06 2026

cc: Parties of Record

Case No. 2026-00184

Service List for Case 2026-00184

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