

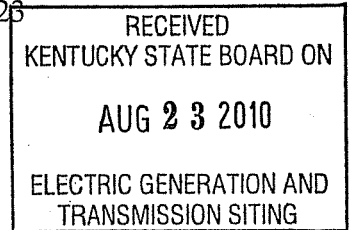
COMMONWEALTH OF KENTUCKY

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.
2010-00226



FIRST DATA REQUEST OF INTERVENOR HENDERSON WATER UTILITY

Comes Henderson Water Utility (hereinafter referred to as "HWU"), by counsel, and in accordance with the Procedural Schedule entered in this matter, files the following Data Request to be responded to by the Applicant no later than August 30, 2010:

1. Please provide any and all data, reports or other information which has not been previously provided in the Application or to HWU which is associated with, is in any manner related to, or was prepared in connection with the Application filed herein and which impacts and/or effects the property and facilities of HWU. This request includes but is not limited to: data, reports, information, documents, files, drawings, charts, records, analyses, memoranda, diagrams, maps, calculations, letters, communications of all types, photographs, images, notes, recordings, correspondence, computer data including computerized electronic mail, videotapes, films, forms, tests, test data, test methodologies, graphs, telephone reports, or any and all other informational accumulations or data compilations from which information can be obtained or translated including all forms of computer storage and retrieval.

2. Please provide a complete analysis, including all maps, plats, designs, reports and calculations, describing the potential interference to electric motors, controls and other electronics, including, but not limited to: VFD's (Variable Frequency Drives) and SCADA (Supervisory Control and Data Acquisition), all of which are utilized in the water treatment and wastewater treatment facilities which will be affected by the proposed transmission line.

3. Please provide any and all analysis, reports, maps, plats, designs, and calculations which address the potential interference with radio signals, cell phones and other equipment, such as GPS, which may result from the construction and/or operation of the proposed 345 kV transmission line.

4. Please describe in detail the potential for ground faults in the HWU equipment and or its facilities which will be in close proximity to the transmission line as proposed, including all reports, maps, plats, and calculations utilized in such analysis.

5. Please describe in detail all electrolysis or corrosion potential regarding equipment and pipelines under and/or around the transmission lines which are proposed to be constructed in Application. Specifically, please address whether Vectren will pay for any necessary retrofitting of existing lines to prevent such corrosion and other measures which may be required in the future as a result of the construction and operation of the 345 kV line where future pipelines or equipment may of necessity cross or parallel the proposed transmission line.

6. Please describe in detail with all appropriate maps, diagrams, plats, reports, and calculations the location of any cross easements or concurrent easements

which will be necessary for existing and future infrastructure, maintenance and/or construction as this may affect HWU.

7. Please provide an analysis of the affect of the proposed line on the current lift station on the HWU property southeast of the intersection of US 60 west and Canoe Creek (2060 US 60 west). Please provide an analysis of how the proposed transmission line and its operation will affect this lift station including all maps, diagrams, plats, reports, analysis utilized in your response.

8. Please specifically identify where the proposed transmission line will be located on the property of Big Rivers, particularly with regard to the current easements, facilities, operations and equipment of HWU and which affect the HWU raw water intake and sewer effluent lines as those lines cross the property currently owned by Big Rivers.

9. Please provide all “Maps of Residential Neighborhoods, Schools and Parks within One Mile of the Proposed Facilities” and the “List of all Affected Property Owners in Henderson County and Webster County” identified in the Table of Contents of the Application, including the testimony of Benjamin Shinabery regarding the same.

10. Please provide the “Diagram of Support Structures” identified in the Table of Contents to the Application and the testimony of William S. Doty regarding the same.

11. Please provide the “Cover Sheet and Index of Drawings (Maps)” which is referenced as being in Volume 2 of the Application.

12. Please provide the “Map of the North Portion of the River Crossing” as identified in the Table of Contents of the Application and the testimony of Ben Shinabery

regarding these documents.

13. Please provide the "Maps" which purportedly appear in Volume 2 of the Applications on pages 19 through 45 and the testimony of Ben Shinabery regarding the same.

These items have all been listed as being contained within the Application, but have not been made available to the Intervenors.

WHEREFORE, Henderson Water Utility respectfully requests that the Applicant fully respond to this Data Request by no later than August 30, 2010.

So moved this the 22nd day of August, 2010.

By: 
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CERTIFICATE OF SERVICE

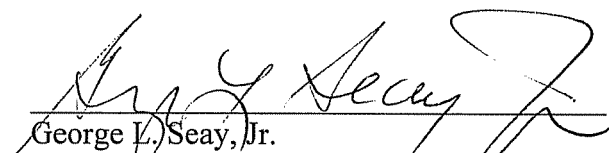
This is to certify that the original and ten true and correct copies of the foregoing has been served upon the following, by hand delivery, at the filing office of the Kentucky Public Service Commission, on this the 23rd day of August, 2010:

Hon. Richard W. Bertelson, III
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211 Sower Blvd
P.O. Box 615
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Mr. Jeff Derouen
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and via U.S. Mail, postage prepaid to:

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