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August 25, 2010

Mr. Jeff Derouen
Executive Director
Kentucky Public Service Commission
Kentucky State Board on Electric Generation & Transmission Siting
211 Sower Boulevard
P.O. Box 615
Frankfort, KY 40602-0615

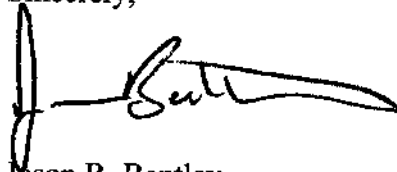
RE: Siting Board Case No. 2010-00223

Dear Mr. Derouen:

Please find enclosed a Motion by Vectren for an extension of time to issue data requests, respond to data requests, and to request that Intervenor enter into a Use Constraint Agreement regarding certain data contained in the Application. This motion was filed electronically on August 25, 2010.

Should you have any questions or concerns, please contact me at the number below.

Sincerely,



Jason R. Bentley
Attorney for Vectren Energy Delivery of Indiana
McBrayer, McGinnis, Leslie & Kirkland, PLLC
305 Ann Street, Suite 308
Frankfort, KY 40601
(502) 875-1176

COMMONWEALTH OF KENTUCKY

BEFORE THE KENTUCKY STATE BOARD

ON ELECTRIC GENERATION AND TRANSMISSION SITING

In the Matter of the 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 Reid EHV)
Station)

Case No. 2010-00223

**MOTION OF VECTREN ENERGY DELIVERY OF INDIANA
FOR EXTENSION OF TIME TO RESPOND TO INTERVENOR DATA REQUESTS
AND FOR CONFIDENTIAL PROTECTION OF**

Comes now Applicant, Southern Indiana Gas & Electric Co., d/b/a Vectren Energy Delivery of Indiana, Inc. (“Vectren”), by counsel, and moves for an extension of time to file data requests upon the City of Henderson, Henderson Municipal Power and Light (“HMPL”), and Henderson Water Utility (“HWU”) (collectively “Intervenors”); respond to data requests from Intervenors; and for use constraint protection for location data of proposed critical utility structures. In support of its motion, Vectren states as follows:

1. As of August 23, 2010, the deadline for filing of data requests, no parties had been granted intervention by the Siting Board in this proceeding. Vectren was engaged in substantive discussions with the City of Henderson, HMPL, and HWU that did not require formal evidentiary inclusion in this proceeding.

2. On August 23, 2010, Vectren received data requests from the Siting Board Staff and Intervenors: City of Henderson, Henderson Municipal Power and Light (“HMPL”) and Henderson Water Utility (“HWU”).

3. The data requested by Intervenors has largely been addressed in meetings with City, HMPL, and HWU officials and raises numerous questions which require Vectren to similarly establish a record through data requests.

4. On August 20, 2010, Intervenors each filed Motions for Extension of Time to File Data Requests requesting that the procedural schedule be amended to allow three business days after the entry of an order granting its Motion to Intervene to file data requests, and that the Applicant be granted a period of no longer than seven days from the date of filing of the data requests to respond thereto. Vectren filed a response in which it did not object to the Motions for Extension of Time.

5. Vectren likewise now requests that the Siting Board amend the Procedural Schedule to allow an additional three days after the entry of an order granting Intervention to file data requests upon Intervenors, and grant them a period of no longer than seven days from the date of filing of the data requests to respond.

6. In addition, Vectren requests an additional two days to respond to the data requests of the Board and Intervenors. Certain maps requested by the Board and the large amounts of data requested by Intervenors will require more than the allotted seven days set forth in the procedural schedule to prepare and submit to the Board. The deadline to for Vectren to respond to data requests would thus be no later than September 1, 2010.

7. Intervenors will not be prejudiced by this delay, since responses to the data requests will be received in advance of the local public meeting on September 2, 2010, and much of the data requested has already been shared with Intervenors during meetings with them in recent weeks.

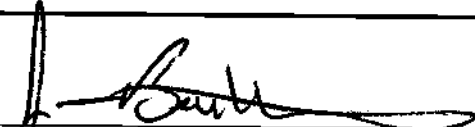
8. Intervenor's data requests include requests for copies of certain maps and diagrams contained in Volume II of Vectren's Application for Certificate to Construct Nonregulated Electric Transmission Line. The Kentucky Open Records Act and Siting Board regulations exempt certain critical systems vulnerability information from public disclosure. *See* KRS 61.878(1)(m)(1)(f) and (g), and 807 KAR 5:110 Section 5. The Public Service Commission requires persons requesting maps of such information to execute a Use Constraint Agreement which restricts public dissemination of the information.

9. Because the information requested by Intervenor contains proposed location data of critical utility structures considered sensitive by the Siting Board and the Public Service Commission (PSC), Vectren will only make available such information to Intervenor's counsel at the Siting Board's direction or upon execution by Intervenor of a Use Constraint Agreement as required by the Public Service Commission. Intervenor were previously extended an invitation and have viewed the Maps in Volume II at Vectren's offices, and would likely be required to execute such an Agreement before obtaining such maps from the PSC.

WHEREFORE, Vectren moves that an Order be entered in this proceeding modifying the procedural schedule to allow Vectren to submit data requests to Intervenor within three days of an Order granting intervention, that Intervenor be granted no more than seven days after receipt of a data request to file a response, and that Intervenor be required to execute a Use Constraint Agreement prior to receiving a copy of Volume II of the Application.


So moved this _____ day of August, 2010.

SOUTHERN INDIANA GAS & ELECTRIC CO.,
D/B/A VECTREN ENERGY DELIVERY OF INDIANA, INC.

By: 
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CERTIFICATE OF SERVICE

I certify a copy of the foregoing was served via US Postal Service First Class Mail, postage prepaid, on the following this 25th day of August, 2010



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