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August 30, 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

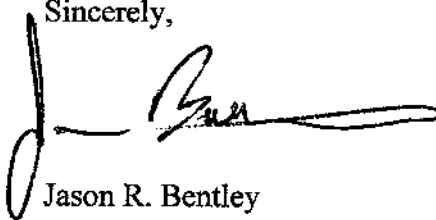
RE: Siting Board Case No. 2010-00223

Dear Mr. Derouen:

Please find enclosed an original copy of Vectren's response to Staff's data request of August 23, 2010. A copy of this response was filed electronically on August 30, 2010.

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

Sincerely,



Jason R. Bentley
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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)	CASE NO.
CERTIFICATE TO CONSTRUCT AN ELECTRIC)	2010-00223
TRANSMISSION LINE FROM ITS AB BROWN)	
PLANT TO THE BIG RIVERS REID EHV STATION)	

SOUTHERN INDIANA GAS & ELECTRIC CO. D/B/A VECTREN ENERGY
DELIVERY OF INDIANA, INC.'S RESPONSE TO SITING BOARD STAFF'S
FIRST DATA REQUEST

1. Refer to page 116 of the Electric Transmission Route Selection Technical Report ("Technical Report"), filed with the Application at Tab 7. Under the heading "Expert Judgment" the Technical Report states that "visual issues" were assigned a weight of 5%, "community issues" were assigned a weight of 25%, "project management" (schedule and cost) issues were assigned a weight of 25%, "construction/maintenance accessibility/reliability" issues were assigned a weight of 25%, and "special permit issues" (COE permits) were assigned a weight of 20%.
 - a. Explain in detail why "visual issues" are assigned a relative weight of only 5% as compared to the other issues considered by the Vectren routing team.

RESPONSE:

The route study utilized the preferred route selection methodology for Kentucky transmission projects to identify suitable corridors for the route. Prior to determining the "expert judgment" as set out the route study, many of the project's effects had already been taken into consideration,

including the natural environment, the built environment, and the engineering environment, and a simple average of those considerations had been established. After identifying the variously weighted corridors, the Vectren Routing Team considered many issues in the “expert judgment” portion of the route study that, from the team’s perspective as the designer, constructor and operator of the line are essential to any engineering, design, financing, construction, and operation of a high-voltage transmission line. The weights set out in the expert judgment reflect the weights assigned to those various concerns by the team.

- b. Explain in detail whether the criteria to be considered by the Siting Board in determining whether to grant or deny the Application filed in this matter include “community issues,” “project management” (schedule and cost) issues, “construction/maintenance accessibility/reliability” issues, or “special permit issues” (COE permits).

RESPONSE: The criteria to be considered by the Siting Board have been established by statute and regulation, and include the Board’s “determination that the proposed route of the line will minimize significant adverse impact on the scenic assets of Kentucky and that the applicant will construct and maintain the line according to all applicable legal requirements.” (KRS 278.714(3).) Thus, the Board must evaluate an applicant’s ability to address scenic impacts while ensuring that the project meets all applicable legal requirements for siting and constructing a high-voltage transmission line. To the extent that “community issues,” project management” (schedule and cost) issues, “construction/maintenance accessibility/reliability” issues, and “special permit issues” (COE permits) are encompassed in “applicable legal requirements,” then the Siting Board must consider them in determining whether to issue a certificate. Clearly, construction/maintenance accessibility/reliability issues and special permit issues are applicable legal requirements. Arguably, project management

(schedule and costs) are applicable legal requirements since the Applicant has a legal obligation to manage costs as a MISO member, for customers, and as a fiduciary duty to shareholders. Although not explicitly required under Kentucky law, the Kentucky Siting Model, which incorporates significant elements of a visual impact analysis, was utilized by the Applicant's consultant to determine suitable routes. The purpose "expert judgment" component of the route study methodology, as Vectren understands it, is to bring into consideration those aspects of the project that might not otherwise have been considered in the other aspects of the study. Specifically, the group responsible for the design, construction and eventual operation of the transmission line (the group providing the "expert judgment for the route study) has some specific considerations, in addition to those covered elsewhere in the route study methodology. Those considerations include both the visual impacts and the design and construction challenges inherent in a transmission line crossing a river of the size and significance of the Ohio River, the impacts of the construction of the line on the affected communities (both positive and negative impacts), project management concerns, the underlying regional reliability concerns that this line is designed to address, and the special permitting requirements that this project will require. Additionally, the expert judgment weighed input (in the community impacts consideration) from local officials whom Vectren consulted concerning the route corridor selection, and the expert judgment conclusions reflect a deliberate decision by Vectren (in deference to comments from local officials) to route the line in a way that keeps it in Indiana for as long as possible prior to crossing the river.

2. Refer to page 116 of the Technical Report. Under the heading "Community Issues" the Technical Report states that the transmission line route designated as "Route D" received a score of 5 or "high impact," and the transmission line route designated as "Route C" received a score of 3 or "medium impact."

- a. Explain in detail whether community leaders with whom Vectren met prior to filing the application expressed a preference for Route C, Route D, or another transmission line route—either a route identified in the Technical Report or another route not examined in the Technical Report.

RESPONSE:

Vectren engaged in numerous consultations with local leaders in Kentucky, from 2008 to the present, and Vectren’s decisions with regard to corridor selection reflect directly the input from those local leaders.

Although a digest of those meetings is set out below, the meeting most relevant to this question is the meeting that occurred on June 30, 2009, attended by the Mayor of the City of Henderson, and the County Judge/Executives for both Henderson County and Webster County. At that meeting the Route C and Route D corridors were discussed, and the guidance provided by the elected officials was that they favored the route which kept the line in Indiana for as long as possible (Route C), and they indicated that a landing on city-owned property would be less problematic for Vectren than a landing on privately-held property. No concerns related to effects of the corridor on any Henderson utility was expressed.

Detail of the Consultations with Local Leaders, 2008-Present

Those consultations included an initial introductory phase (2008-2009):

- 2/20/2008 Meeting in Henderson, KY with County Judge/Executive Sandy Lee Watkins**
- 3/6/2008 Attendance at the Energy Summit in Henderson County**
- 8/11/2008 Meeting in Henderson, KY at Northwest Kentucky Forward, with Mayor Tom Davis and HMP&L General Manager Gary Quick**

- 8/27/2008** Follow Up Meeting with HMP&L staff at HMP&L Offices
- 12/2008** Meeting in Henderson KY with Mayor Tom Davis to apprise him that Vectren will be conducting a route study using the preferred Siting Methodology
- 4/21/2009** Meeting with General Manager of HMP&L to provide update on status of the route study and overall project status

A preliminary corridor selection phase (2009-2010):

- 6/26/2009** Meeting with General Manager of HMP&L to discuss route corridors resulting from the route study
- 6/30/2009** Meeting with Henderson Mayor Tom Davis, Henderson County Judge/Executive Sandy Lee Watkins and Webster County Judge/Executive Jim Townsend at Vectren offices to discuss route corridors resulting from the route study.
- 8/2009** Initial request by Vectren to HMP&L Board to appear and present a project proposal (and review route corridor).
- 8/12/2009** Initial Meeting with Henderson City/County Planning Commission staff to discuss project, applicability of local ordinances, regulations, zoning requirements and review route corridor
- 9/28/2009** Formal Presentation in closed session of the HMP&L Board
- 10/13/2009** Meeting with General Manager at HMP&L Offices
- 10/21/2009** Meeting with General Manager at HMP&L Offices
- 10/28/2009** Meeting with General Manager at HMP&L Offices

11/2009 – 5/2010 Consultations and discussions with other regional utilities concerning the project, which discussions remain subject to confidentiality agreements between the parties.

A final route phase (June 2010-present):

6/1/2010 Meeting in closed session of Henderson Fiscal Court to discuss project, and expected filing of an application before the Kentucky Siting Board.

Week of 6/1/2010 Courtesy communications to Mayor Tom Davis and HMP&L General Manager concerning expected filing of an application before the Kentucky Siting Board.

7/6/2010 Public Meeting focused on residential property owners affected by the project and open to members of the public. Interested members of the community, including affected property owners and some people who identified themselves as employees of HMP&L, attended.

8/3/2010 Meeting with Assistant City Manager Buzzy Newman to review an alternate route proposed by him.

8/4/2010 Meeting with representatives of the City of Henderson, HWU and HMP&L, and Henderson Gas Utility, to discuss project and to establish points of contact to schedule follow up meetings with the various municipal utilities to work to address their concerns.

8/2010 Series of meetings and phone consultations with City of Henderson, HWU and HMP&L staffs to discuss certain alternate route proposals proposed by the City, HWU and HMP&L, and none of which as of this date (August 30, 2010) the City, HWU and HMP&L could agree to support.

- b. Explain in detail the significance of the number of properties over which Route D would run, as compared to the number of properties over which Route C would run, with regard to their respective scores of 5 and 3 under “Community Issues.”

RESPONSE:

Vectren’s Expert Judgment, taking into account the preference expressed by local officials in Henderson that the line stay in Indiana for as long as possible, was that Route C affected fewer Kentucky properties and property owners than did Route D.

- c. Was the difference between the score of “5” for Route D and the score of “3” for Route C under “Community Issues,” primarily the result of the higher number of properties over which Route D would run, as compared to the number of properties over which Route C would run?

RESPONSE:

Yes, the difference in the scores reflects the fact that fewer properties and property owners in Kentucky would be affected by Route C.

3. Refer to the Technical Report at page 117. Under the heading “Special Permit Issues” the Technical Report states, “[i]t is expected that the Corps of Engineers (USACE) will prefer the Ohio River crossing of Route D over Route C...because Route C will need a [support] structure placed on Henderson Island in the Ohio River.”
 - a. If the Siting Board approved Vectren’s application and Route C, with no modifications, and if the USACE later denied Vectren a permit to place a support structure on Henderson Island, would Vectren have to re-apply to the Siting Board for a new

construction certificate for its nonregulated transmission line that is the subject of this case?

RESPONSE:

Vectren initiated discussions with the US Army Corps of Engineers in August 2009, and those preliminary discussions resulted in Vectren's decision to move forward with Route C. Under the regulations governing the Siting Process, Vectren would need to re-apply to the Siting board if significant changes to any part of the route were to become necessary for engineering, construction or other reasons.

- b. Refer to "Figure 25: Wetlands" at page 60 of the Technical Report. If the Siting Board required Vectren to use Route D as opposed to Route C, explain in detail what "Special Permit Issues" Vectren would have to address in order to apply for and obtain a permit from the USACE and other regulatory agencies to construct the transmission line and support structures through the wetlands areas shown on the map in Figure 25 of the Technical Report.

RESPONSE:

Vectren's decision to pursue Route C included, in addition to the preferences expressed by local leaders, Vectren's initial determination that the wetlands issues and endangered species issues concentrated along Route D made Route D far less favorable for construction of the Project. In Vectren's experience, wetlands can be difficult terrain for construction and maintenance of electric facilities. That fact, coupled with the greater distance from public roadways to the Route D corridor (as compared to distance from public roadways to the Route C corridor, caused Vectren to conclude that the Route C corridor is the better choice for the line. Vectren

has not yet had the opportunity to conduct field surveys of the area, and cannot cite to specific permits that may be required.

4. Refer to “Figure 11: Airports & Glide Paths” at page 32 of the Technical Report.
 - a. If the Siting Board required Vectren to use Route D as opposed to Route C, and Vectren completed its construction of the transmission line along Route D prior to the Henderson City-County Airport (“airport”) implementing its planned expansion, as shown in Figure 11, what restrictions would the placement of the Vectren transmission line pose on the airport’s expansion plans?

RESPONSE:

Vectren had informal consultation with the airport authority at the time this project was announced in 2008, and, more recently, additional informal discussions with the consulting engineering firm working on airport expansions. Early in its route corridor assessments, Vectren was advised by local officials of the planned airport expansion, and another difficulty identified by Vectren and related to the Route D corridor was the corridor’s proximity to the airport expansion glidepath.

- b. Assuming the same hypothetical scenario as outlined in Item 4a. above, is it possible that Vectren would have to move the transmission line in order to accommodate the airport’s future expansion plans?

RESPONSE:

It is possible. However, Vectren’s selection of Corridor C eliminates the need to speculate on this possibility.

- c. If the answer to Item 4b. above is “yes,” would Vectren have to re-apply to the Siting Board for a new construction certificate in order to move the transmission line?

RESPONSE:

Under the regulations governing the Siting Process, Vectren would need to re-apply to the Siting board if significant changes to any part of the route were to become necessary for engineering, construction or other reasons.

5. Explain in detail whether customers of any electric utility subject to the jurisdiction of the Kentucky Public Service Commission will be subject to higher rates as a result of the construction of Vectren’s proposed transmission line.

RESPONSE:

Vectren is constructing this electric transmission line. This line has been identified by the Midwest Independent Transmission System Operator (Midwest ISO) as a baseline reliability project. As such, Vectren and the other members of the Midwest ISO (members as of 2006 when this project was approved by the Midwest ISO) who benefit from the line, will pay proportionately for its construction. Any electric utility that uses this line will pay for that use, pursuant to the federal Open Access Transmission Tariff. Vectren’s purpose in constructing the line is two-fold – first, to enhance electric reliability within the Northwest Kentucky/Southwest Indiana region along a particularly congested area of the Eastern Interconnection (identified by the US Department of Energy as one of the top 50 constraints in the Eastern Interconnect), and, secondly, to ease the import (purchase) and export (sale) of power in the Midwest ISO energy markets by means of this transmission line. Both of those purposes benefit utility customers in Southwest Indiana and in Northwest Kentucky.

6. Explain in detail whether the transmission line proposed by Vectren could adversely impact the facilities or operations of Henderson Municipal Power and Light (“HMP&L”).

RESPONSE:

Vectren does not expect the proposed line to adversely impact any facilities or operations of HMP&L. The proposed line will be designed and built to meet or exceed all required NESC clearances and applicable codes. The proposed line will be in a separate private Right-of-Way and will not share common structures with any HMP&L facilities. Where the proposed line is required to cross existing HMP&L facilities such as distribution facilities along roads or transmission lines to or from existing HMP&L substations, Vectren will design the line for all appropriate required clearances. If HMP&L has any specific requirements defined in any standards that they can provide that are more stringent, those requirements will be incorporated into the detailed design as well. The proposed line will not hinder HMP&L’s ability to access, maintain, or operate the existing facilities. The Midwest ISO studies have found no adverse effects and have not shown any additional projects such as breaker replacements to be required due to fault current changes attributed to the proposed line installation.

7. Explain in detail whether the transmission line proposed by Vectren could adversely impact the ability of HMP&L to expand its facilities in the future.

RESPONSE:

Vectren has requested copies of expansion plans from HMP&L. None has been provided. Vectren was informed by HMP&L that none currently exists. Without having details of the HMP&L’s future plans and the opportunity to study those plans, Vectren cannot provide a definitive answer to this question.

While Vectren had offered to coordinate closely with HMP&L to avoid conflicts with future plans, HMP&L proposed instead an alternate route. Vectren studied that alternate route, and presented a design of that alternate to HMP&L for its consideration, and HMP&L expressed no interest in supporting its own proposed alternate route in this proceeding or any subsequent proceeding. A member of the HMP&L team meeting with Vectren to review the alternate indicated that not only didn't the team like their own alternate, but that Vectren should "stay out of Henderson County." The HMP&L general manager in a subsequent discussion stated he wanted Vectren "nowhere on HMP&L property." Absent strong support from the affected entity, Vectren could not justify such any change to its route (even one proposed by HMP&L) on the mere hope that HMP&L might support it.

Vectren has met with representatives of HMP&L to discuss detailed operational and engineering concerns. Vectren does not anticipate or intend that the proposed line would impact any future HMP&L facilities adversely. Vectren is aware that HMP&L has a substation located along the path of the proposed line. (Initial discussions indicate that it is referenced as HMP&L Substation # 4.) As proposed, the centerline of the Vectren line does not encroach on the substation, but the outer edge of the ROW does overlap the substation fence. Vectren does not require and does not expect to be granted access to the Substation inside the fence. The Vectren project's final design, including location and type of structures for the proposed line, is not complete, but the Vectren preliminary design proposed in Vectren's application to the Siting Board can accommodate future expansion of the substation to either the west or the east with minimal conflicts. Vectren routinely works effectively with neighboring utilities, and Vectren would expect to work effectively with HMP&L to address any concerns.

8. Explain in detail whether the transmission line proposed by Vectren could adversely impact the facilities or operations of Henderson Water Utility ("HWU").

RESPONSE:

Vectren has met with representatives of HMU to discuss detailed operational and engineering concerns. Vectren does not expect that the proposed line would adversely impact any facilities or operations of HWU. The proposed line will be designed and built to meet or exceed all required NESC clearances and applicable codes for above ground facilities. Any below grade facilities will be coordinated to prevent corrosion or acceleration of the aging of the facilities. Bonding of facilities will be coordinated so as to not conflict or interfere with existing corrosion control equipment such as anodes or rectifier systems. The proposed line will be in private ROW and cross known facilities at right angles where possible. The proposed line would not restrict access, maintenance or operational capability of HMU facilities. In Vectren's discussions with representatives of the City of Henderson and its utilities, Vectren has pledged to follow good utility practice with regard to siting or crossing of facilities within transmission line easements where possible, generally by means of an encroachment agreement or other such documentation, as appropriate. Because each such circumstance is unique, Vectren has proposed to the City of Henderson and its utilities that each such circumstance be considered on a case by case basis.

9. Explain in detail whether the transmission line proposed by Vectren could adversely impact the ability of HWU to expand its facilities in the future.

RESPONSE:

In Vectren's discussions in August 2010 with representatives of HMU, HMU has expressed concerns that Vectren's line is not compatible with HMU

plans for expansion. While Vectren had offered to coordinate closely with HMU to avoid conflicts with those future plans, HMU and the City of Henderson proposed instead an alternate route. Vectren studied that alternate route, and presented a design of that alternate to the City and HMU for their consideration, and neither the City nor HMU expressed interest in supporting their proposed alternate route in this proceeding or any subsequent proceeding. Absent strong support from the affected entities, Vectren could not justify any change to its route (even one proposed by the City and HMU) on the mere hope that the City and HMU might support it.

10. Explain in detail whether the transmission line proposed by Vectren could adversely impact the ability of HMP&L to operate its supervisory control and data acquisition ("SCADA") systems.

RESPONSE:

Vectren has met with representatives of HMP&L to discuss detailed operational and engineering concerns. Vectren does not anticipate or intend that the proposed line would impact any HMP&L facilities adversely. Vectren has explained to HMP&L that Vectren uses 900Mhz licensed and unlicensed spread-spectrum radio, microwave, single mode fiber, and dial-up wire communication networks in its own SCADA systems at its transmission and distribution electric substations. Vectren does not have any interference or issues attributed to Extra High Voltage (EHV) lines. There is presently an AEP 765kV line EHV that crosses Vectren 138kV and 69kV lines near Vectren's Newtonville and Grandview Substations. Vectren has SCADA at these sites and Vectren does not have issues with EHV interference with communications. Vectren cites this practical application in support of its answer that the Vectren line would not affect HMP&L SCADA systems.

11. Explain in detail whether the transmission line proposed by Vectren could adversely impact the ability of HWU to operate its SCADA systems.

RESPONSE:

See answer to 10, above. Vectren has met with representatives of HMU to discuss detailed operational and engineering concerns. Vectren does not anticipate or intend that the proposed line would impact any future HMU facilities adversely.

12. Explain in detail whether the City of Henderson has identified to Vectren any adverse visual impacts it believes the transmission line proposed by Vectren will have on any scenic assets located within its jurisdictional boundaries.

RESPONSE:

Discussions with the representatives from the City of Henderson have focused on addressing concerns related to city utilities, their futures, their current operations and alternate routing possibilities. Vectren has not had formal discussions with the City related to adverse visual impacts. Vectren is aware that BBC Consulting, hired by the Siting Board to evaluate visual impacts has filed a report outlining its findings related to Vectren's proposed route.

13. Explain in detail whether the City of Henderson has identified to Vectren any adverse visual impacts it believes the transmission line proposed by Vectren will have on any scenic assets located outside its jurisdictional boundaries.

RESPONSE:

Please see response to 12, above.

14. Refer to the two documents titled "Henderson County Property Owner Mailing List," and "Webster County Property Information," found at Tab 4 of the Application, which lists 64 property parcels that are potentially affected by the proposed transmission line and the owners of those properties.
- a. Did Vectren send an invitation letter to the July 6, 2010 public meeting to all of the owners of the 64 property parcels listed in the documents in Tab 4 of the Application?

RESPONSE:

Vectren undertook this public meeting on July 6, 2010, as a courtesy to residential property owners along its proposed route. The meeting was not required by regulation or statute, but, Vectren initiated the meeting as an opportunity to introduce the project to those within the Henderson community who might not be familiar with it, or, with Vectren. As Vectren had had frequent contacts with local leaders over the past two years, Vectren focused this effort on residential property owners with whom Vectren had not yet met. Consequently, Vectren sent invitations to those 53 residential property owners. The event was also publicized in the media (print and electronic) and on Vectren's project website (www.kentuckypowerup). Vectren representatives interacted with all attendees, including attendees who indicated they represented local utilities and local government, speaking at length with representatives who indicated they were from HMP&L.

- b. Please list any property owners who were not notified by mail of the July 6, 2010 public meeting or whose invitation was returned due to an incorrect address and/or no forwarding address.

RESPONSE:

While the meeting was open to the public, held in a public area of the Henderson Community College, publicized in the local media (print and electronic) and on Vectren's project website (www.kentuckypowerup.com) and representatives from one or more City of Henderson departments or agencies did in fact attend and discuss the project with Vectren representatives, the focus of the meeting was outreach to private property owners along the route, and letters were mailed to 53 property owners.

Given previous consultations with local leaders, Vectren anticipated the contacts with those responsible for public properties would be handled by direct contact later in the process. When it became clear from an inquiry from the Henderson Assistant City Manager that the City of Henderson held a different expectation, Vectren scheduled meetings with the City and city utilities, and those meetings have been ongoing throughout the month of August 2010.

Following are the property owners who did not receive an individualize, mailed invitation to the meeting:

- **City of Henderson – Hwy 60 W**
- **City of Henderson Humane Society – Municipal Center**
- **City of Henderson – Borax Dr.**
- **City of Henderson - Fairmount Cemetery**
- **City of Henderson – Hwy 41 A**
- **Henderson County – Hwy 41 S**
- **City of Henderson Water and Sewer Commission – Drury Lane**
- **City of Henderson – Mt. Zion Cemetery**

15. How many members of the public attended the July 6, 2010 public meeting?

- a. Provide a copy of any minutes, attendance sheets, or other documents produced at the July 6, 2010 public meeting.

RESPONSE:

Please see materials related to the public meeting attached and tabbed as part of this Response. Those materials include the “Sign In” sheet from the meeting. Thirty one persons signed in. While Vectren asked attendees to kindly sign in, Vectren could not compel any attendee to sign in.

- b. Did Vectren send a follow-up letter to those property owners who did not attend the July 6, 2010 public meeting?

RESPONSE:

Yes, please see materials related to the public meeting attached and tabbed as part of this Response. Those materials include the letter to residential and commercial property owners who did not attend. The letter included the materials the property owner would have received had he, she or they attended the public meeting. Contacts with City of Henderson and City of Henderson utilities have been handled separately.

- c. If the response to Item 15b, above, is “yes,” how many property owners were sent a follow-up letter and how many property parcels does that number reflect?

RESPONSE:

28 property owners received follow up letters and packets, those 28 property owners represent 32 parcels along the route.

- 16. Provide a map showing both Route C and Route D from the AB Brown Generating Station to the point where they share a common route to the Reid Substation. The map shall be a single oversize map, at a scale of 1” = 3,500’ or of greater detail, with a base map of aerial photography and the road network.

RESPONSE:

Please see the map tabbed and attached as part of this Response.

Respectfully submitted this 30th 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 30th day of August, 2010



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