McBrayer, McGinnis, Leslie & Kirkland, PLLC

ATTORNEYS-AT-LAW

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September 3, 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 and one copy of Vectren's response to data request of City of Henderson. A copy of this response was filed electronically on September 3, 2010.

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

incerely,

Attorney for Vectren Energy Delivery of Indiana McBrayer, McGinnis, Leslie & Kirkland, PLLC 305 Ann Street, Suite 308

Frankfort, KY 40601 (502) 875-1176

ASHLAND

FRANKFORT

GREENUP

LEXINGTON

LOUISVILLE

COMMONWEALTH OF KENTUCKY

BEFORE THE KENTUCKY STATE BOARD ON ELECTRIC GENERATION AND TRANSMISSION SITING

In the Matter of:

APPLICATION OF SOUTHERN INDIANA GAS &	1	
ELECTRIC CO. D/B/A VECTREN ENERGY	í	
DELIVERY OF INDIANA, INC., FOR A	í	CASE NO.
CERTIFICATE TO CONSTRUCT AN ELECTRIC	í	2010-00223
TRANSMISSION LINE FROM ITS AB BROWN	í	
PLANT TO THE BIG RIVERS REID EHV STATION	í	

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

a. Please provide any and all data, reports, or other information which has not been previously provided in the Application or to the City 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 the City. 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 information accumulations or data compilations from which information can be obtained or translated including all forms of computer storage and retrieval.

Witness: Michael W. Chambliss

RESPONSE:

Object. Request is overbroad.

Vectren has provided to the City of Henderson all relevant documents within Vectren's possession, with the exception of maps which remain subject to certain protections and requirements for release dictated by the Kentucky Public Service Commission. Vectren understands that certain assurances must be provided to the Commission prior to release of such maps, and, upon demonstration by the City's Counsel that such assurances have been provided, Vectren will provide said maps. Vectren has already provided, at the City's request, certain other maps and depictions, including, but not limited to, maps depicting the City's alternate route proposals, which the City and its municipal utilities ultimately declined to support in this proceeding. Emails and other correspondence relevant to this request occurred between the representatives of the city and/or its municipal utilities and Vectren, and the City has the same access to those as does Vectren. Information related to reports and data requested by specific city utilities is provided under separate response to the specific city utilities.

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.

Witness:

Michael W. Chambliss

RESPONSE:

Please refer to materials at Tabs 3 and 4 in the Application for Certificate to

Construct Nonregulated Electric Transmission Line submitted by Southern

Indiana Gas & Electric Co. d/b/a Vectren Energy Delivery of Indiana, Inc.

(hereafter, Vectren) for the maps and list request. Said Application was

previously served on the City, per the statutory and regulatory

requirements governing this Siting Board process. Please refer to

Certificate of Service at Tab 13.

No testimony has been completed at this time. Testimony will be

completed and submitted pursuant to the procedural schedule established

within this Cause, and, as an intervening party, the City will receive a copy

of said testimony and copies of the direct testimony of all Vectren

witnesses within that schedule.

3. Please provide the "Diagram of Support Structures" identified in the Table of

Contents to the Application and the testimony of William S. Doty regarding same.

Witness:

Michael W. Chambliss

RESPONSE:

Please refer to the materials at Tab 5 in the Application for Certificate to

Construct Nonregulated Electric Transmission Line submitted by Southern

Indiana Gas & Electric Co. d/b/a Vectren Energy Delivery of Indiana, Inc.

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(hereafter, Vectren) for the Diagrams of Support Structures. Said

Application was previously served on the City, per the statutory and

regulatory requirements governing this Siting Board process. Please refer

to Certificate of Service at Tab 13.

No testimony has been completed at this time. Testimony will be

completed and submitted pursuant to the procedural schedule established

within this Cause, and as an intervening party, the City will receive a copy

of said testimony and copies of the direct testimony of all Vectren

witnesses within that schedule.

4. Please provide the "Cover Sheet and Index of Drawings (Maps)" which

referenced as being in Volume 2 of the Application.

Witness:

Michael W. Chambliss

RESPONSE:

Please see attached copy of Cover Sheet and Index of Drawings (Maps) at

Tab 2.

5. 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.

Witness:

Michael W. Chambliss

RESPONSE:

Please refer to Response to Data Request Number 1, regarding process for

release of maps prepared by Vectren and filed with the Kentucky Siting

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Board. Please refer to Response to Data Request Number 2, regarding

status of direct testimony in this Cause.

6. Please provide the "Maps" which purportedly appear in Volume 2 of the

Application on pages 19 through 45 and the testimony of Ben SHinabery

regarding same.

Witness:

Michael W. Chambliss

RESPONSE:

Please refer to Response to Data Request 5, above.

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CERTIFICATE

I certify that the responses set out above are true and accurate to the best of my knowledge, information and belief, formed after reasonable inquiry.

William S. Doty, President

Southern Indiana Gas & Electric Co.

d/b/a Vectren Energy Delivery of

Indiana, Inc.

Respectfully submitted,

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

Jason R. Bentley, Attorney

McBrayer, McGinnis, Leslie & Kirkland,

303 Ann Street, Suite 308 Frankfort, KY 40601 Telephone: 502 875 1176

Fax: 502 226 6234

Email: <u>ibentley@mmlk.com</u>

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 3

ason R. Bentley

McBrayer, McGinnis, Leslie & Kirkland, PLLC

305 Ann Street, Suite 308 Frankfort, Kentucky 40601

day of September, 2010

George L. Seay, Jr. WYATT, TARRANT & COMBS, LLP 250 West Main Street, Suite 1600 Lexington, KY 40507