

McBRAYER, MCGINNIS, LESLIE & KIRKLAND, <sup>PLLC</sup>  
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

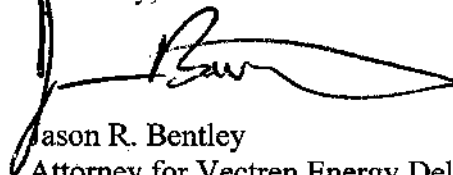
RE: Siting Board Case No. 2010-00223

Dear Mr. Derouen:

Please find enclosed an original and one copy of Vectren's response to data requests of Henderson Water Utility. 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.

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:**

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

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

1. 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 Henderson Water Utility (HWU) 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 HWU's Counsel that such assurances have been provided, Vectren will provide said maps. Vectren has already provided, at the City of Henderson's request and/or at HWU'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 as of this date have 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 HWU has the same access to those as does Vectren.**

2. Please provide a complete analysis, including all maps, plats, diagrams, 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.

**Witness: Michael W. Chambliss**

**RESPONSE:**

**Vectren has previously met with HWU to address these issues several times during the month of August, 2010, and has discussed concerns with HWU as recently as August 30, 2010. HWU and the City of Henderson have indicated that they expect these contacts and this dialogue to be on-going, and Vectren supports continued dialogue as well.**

**Vectren's project is in the preliminary design phase. Consequently, a complete analysis has not yet been performed.**

**Vectren Energy Delivery ("Vectren") uses SCADA in many of Vectren's substations and uses all three of the communications methods HMP&L references. Specifically, 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 operates lines that use both Power Line Carrier (PLC) and Optical Ground Wire (OPWG-Fiber) within our substations without any issues. Vectren does not anticipate any negative affects on any substation facilities based on preliminary analysis and previous experiences.**

**Vectren also uses VFDs (Variable Frequency Drives), many large motors, controls, and electronics in Vectren plants and Vectren has not experienced problems with this equipment due to close proximity to transmission lines. Vectren also uses electro-mechanical and**

**microprocessor-based relays, other electronic controls and automation, and has not experienced problems with these devices in Substations due to transmission lines. This proposed transmission line will be connected to Vectren's AB Brown Generation station which also uses VFDs and SCADA. Vectren does not anticipate negative affects on its own facilities or on the facilities of any other utility, based on Vectren's preliminary analysis and Vectren's previous experiences.**

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 consruction and/or operation of the prosed 345 kV transmission line.

**Witness: Michael W. Chambliss**

**RESPONSE:**

**See Response to Data Request 3, above. Additionally, Vectren's project is in the preliminary design phase. Consequently, a complete analysis has not yet been preformed. 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 experience, and has not experienced, 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's substation employees use cell phone frequently inside the substation as part of our normal operational communications and do not experience interference due to the electrical lines. GPS clocks are presently used in most Vectren Substations and no interference issues for satellite communications are experienced. Vectren does not anticipate negative affects on its own facilities or on the facilities of any other utility, based on Vectren's preliminary analysis and Vectren's previous experiences.**

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.

**Witness: Larry Rogers**

**RESPONSE:**

**See Response to Data Request 3, above.**

**Vectren has previously requested but has not received an inventory of the HWU facilities (including the specific characteristics that may lead HWU to believe that said facilities are susceptible to being affected by Vectren's proposed transmission line). Vectren has also previously requested but**

**has not received information regarding any future, proposed, or planned HWU facilities.**

**The detailed engineering for the proposed construction is not complete and will not be prepared prior to the conclusion of this Siting Board proceeding. Thus, fault information of the structures along the path of the line is not available, but such information can be provided after the detailed engineering is completed. Vectren's preliminary information, previously communicated to HWU, indicates that faults of the proposed line will not adversely affect the HWU facilities.**

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.

**Witness: Larry Rogers**

**RESPONSE:**

**Please see response to Data Request 4, above. Additionally, Vectren is a combination natural gas and electric utility with considerable experience coordinating natural gas pipelines within our own electric easements, as**

**well as within the easements of other electric utilities within our Indiana and Ohio gas service territories. Vectren does include reasonable costs of mitigating electrolysis or corrosion potential on metal facilities as part of our project, for existing facilities within or adjacent to our ROW. Vectren does not generally include mitigation on any non-metal facilities such as PVC. Any actual mitigation plan is always coordinated with the affected utility, using standards and best practices both for equipment longevity and for personnel safety.**

**Vectren, and all other utilities sharing utility corridors, whether above ground, on the ground, or in the ground, share those facilities as they find them – if Vectren facilities already in place affect HWU or other utility facilities proposed for the vicinity, good utility practice would dictate that the later in time utility would either design in such a way as to not disturb utility facilities already in place or, in the alternative, locate outside that easement. Vectren has reviewed with the City of Henderson and HWU Vectren’s standard practice for review and response to proposed easement encroachments, including but not limited to, Vectren’s commitment to accommodate any easement encroachment which it can feasibly accommodate.**

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.



**Witness: Michael W. Chambliss**

**RESPONSE:**

**Please see response at Data Request 1, above.**

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 60West and Canoe Creek (2060 US 60 West). Please provide an analysis of how the proposed transmission line and its operation will affect thislift station including all maps, diagrams, plats, reports, analysis utilized in your response.

**Witness: Michael W. Chambliss**

**RESPONSE:**

**See Response to Data Request 4, above. Vectren has previously requested from HWU any such studies and analyses, and Vectren has previously indicated its willingness to design around any such concerns that HWU may decide to bring to Vectren's attention. HWU has indicated in the August meetings with Vectren its own need for certain easements from a third party utility, as well as HWU's and the City of Henderson's intent to attempt to "leverage" Vectren's need for easements in this Vectren project (which is subject of this Application) to somehow attempt to induce that third party utility to provide easements or other accommodations.**

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, operation and equipment of HWU and which affect the

HWU raw water intake and sewer effluent line as those lines cross the property currently owned by Big Rivers.

**Witness: Michael W. Chambliss**

**RESPONSE:**

**Please see response to Data Request 1, above, for access to the maps which address this request. Vectren has previously indicated to HWU and the City of Henderson that, pursuant to caselaw and good utility practice, any easement which Vectren obtains which crosses existing easement(s) will be obtained subject to any such existing easement.**

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.

**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 of Henderson, 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, HWU will receive a copy of said testimony and copies of the direct testimony of all Vectren witnesses within that schedule.**

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 same.

**Witness: Michael W. Chambliss**

**RESPONSE:**

**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. (hereafter, Vectren) for the Diagrams of Support Structures. Said Application was previously served on the City of Henderson, per the statutory and regulatory requirements governing this Siting Board process. Please refer to Certificate of Service at Tab 13 in the Application.**

**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, HWU will receive a copy of said testimony and copies of the direct testimony of all Vectren witnesses within that schedule.**

11. 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 to this Response.**

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.

**Witness: Michael W. Chambliss**

**RESPONSE:**

**Please refer to Response to Data Request Number 9, regarding process for release of maps prepared by Vectren and filed with the Kentucky Siting Board. Please refer to Response to Data Request Number 10, regarding status of direct testimony in this Cause.**

13. 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 12, 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.



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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.

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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 3<sup>rd</sup> day of September, 2010



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Jason R. Bentley  
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