

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

**RESPONSE OF VECTREN TO HENDERSON WATER UTILITY  
MOTION FOR NEW PROCEDURAL SCHEDULE AND  
SECOND MOTION TO COMPEL**

Comes now Southern Indiana Gas & Electric Co., d/b/a Vectren Energy Delivery of Indiana, Inc. (“Vectren”), by counsel, in response to two motions by Henderson Water Utility (HWU): Second Motion to Compel; and Motion to Reschedule Formal Evidentiary Hearing; and to Extend Deadlines for the Filing of Witness Lists, Summaries of Witness Testimony and Direct Testimony; and respectfully states as follows:

Regarding HWU’s Second Motion to Compel, the diagrams and location of proposed structures requested in HWU’s first motion to compel were publicly available from the date of filing of the present application and had been provided to the City of Henderson as part of the initial application. Nevertheless, Vectren has provided additional copies to HWU in response to their motion. The information contained at Tab 20 of Volume II of the application shows the type and location of proposed support structures, and Tab 5 of Volume I contains detailed engineering diagrams of each of the proposed structures.

The diagrams of support structures at Volume I, Tab 5 are typical of those used by the utility industry and represent the best information Vectren currently has available regarding the design specifications of said structures. The Map at Volume 2, Tab 20, shows the proposed location of a lattice tower and three single towers.

Good utility practice requires that the exact, final location of the support structures within a right-of-way have some degree of variability in order to accommodate the reasonable concerns of land owners. It is Vectren's practice to work with land owners and to accommodate reasonable concerns regarding the placement of structures, and Vectren intends to do so with regards to this transmission project.

The detailed work required to determine the final construction design and placement of structures for this proposed project will require four-to-six million dollars of additional engineering studies. It would not be good utility practice for Vectren to incur the costs of final design engineering work without approval of the Siting Board for the proposed transmission line and route.

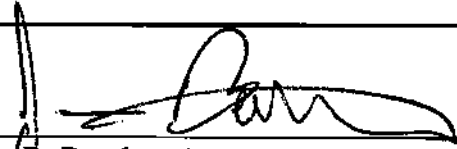
Regarding HMU's motion to extend the procedural schedule, Vectren does not object to extending the deadline for filing of witness lists and summary of testimony from September 20 to September 27, and the deadline for filing final prehearing testimony from September 28 to October 4, 2010.

WHEREFORE, Vectren respectfully requests that the Siting Board deny HWU's Second Motion to Compel on the grounds that all such information in Vectren's possession has already been provided to Intervenor, and Vectren does not object to Intervenor HWU's requested extension of time.

Filed with the Siting Board this 20<sup>th</sup> day of September, 2010.

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

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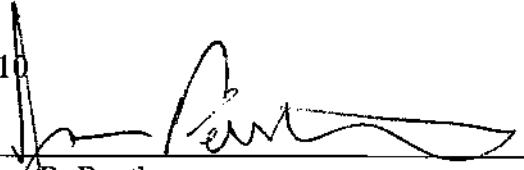
**CERTIFICATE OF SERVICE**

I certify a copy of the foregoing was served via US Postal Service First Class Mail, postage prepaid, on the following:

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

And I hereby certify that an original and one copy were hand delivered to the Kentucky State Board on Electric Transmission and Siting, c/o the Kentucky Public Service Commission, 211 Sower Boulevard, P.O. Box 615, Frankfort, Kentucky 40601.

Done this 20<sup>th</sup> day of September, 2010

  
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