

**COMMONWEALTH OF KENTUCKY**  
**BEFORE THE PUBLIC SERVICE COMMISSION**

In the Matter of:

ELECTRONIC APPLICATION OF KENTUCKY	)	
UTILITIES COMPANY FOR AN ADJUSTMENT OF	)	Case No. 2016-00370
ITS ELECTRIC RATES AND FOR CERTIFICATES	)	
OF PUBLIC CONVENIENCE AND NECESSITY	)	

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**EAST KENTUCKY POWER COOPERATIVE, INC.’S  
FIRST REQUEST FOR INFORMATION TO KENTUCKY UTILITIES COMPANY**

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Comes now East Kentucky Power Cooperative, Inc., (“EKPC”), by counsel, and hereby respectfully propounds its first set of requests for information upon Kentucky Utilities Company (“KU”).<sup>1</sup> KU’s response is requested and expected to be in conformity with the Order entered herein by the Kentucky Public Service Commission on December 13, 2016, 807 KAR 5:001 and the following:

**INSTRUCTIONS**

- (a) Please provide written responses, together with any and all exhibits pertaining thereto, in one or more bound volumes, separately indexed and tabbed by each response.
- (b) If any request appears confusing, please request clarification directly from EKPC, by and through the undersigned.
- (c) The responses provided should first restate the relevant request, as well as identify the person(s) supplying the information.

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<sup>1</sup> EKPC’s request to intervene in this proceeding is presently pending before the Commission. *See* EKPC’s Motion for Leave to Intervene (filed Dec. 21, 2016). Because the Commission’s Order entered herein on December 13, 2016, requires that requests for information to KU be filed no later than January 11, 2017, EKPC tenders this request for information now to avoid any disruption of the procedural schedule.

(d) Please respond to each designated part of each request separately. If you do not have complete information with respect to any request, so state and give as much information as you do have with respect to the matter inquired about, and identify each person whom you believe may have additional information with respect thereto.

(e) These requests shall be deemed continuing so as to require further and supplemental responses if KU receives or generates additional information within the scope of these requests between the time of the original responses and the entry of a final Order in this proceeding.

(f) To the extent that the specific document, workpaper or information does not exist as requested, but a similar document, workpaper or information does exist, please provide the similar document, workpaper, or information.

(g) To the extent that any request may be answered by way of a computer printout, please identify each variable contained in the printout which would not be self-evident to a person not familiar with the printout.

(h) If you object to any request on the grounds that the requested documentation or information is proprietary in nature, or for any other reason, please notify EKPC as soon as possible.

(i) For any document or information withheld on the basis of privilege, state the following: date; author; addressee; indicated or blind copies; all persons to whom distributed, shown, or explained; and, the nature and legal basis for the privilege asserted.

(j) "And" and "or" should be considered to be both conjunctive and disjunctive, unless specifically stated otherwise. "Each" and "any" should be considered to be both singular and plural, unless specifically stated otherwise. Words in the past tense should be considered to include the present, and words in the present tense include the past, unless specifically stated otherwise.

## REQUESTS FOR INFORMATION

1. Please provide a detailed description of how decisions have been/will be made regarding which specific transmission line/substation facilities (that is, specific locations) are addressed in each year of the Transmission System Improvement Plan (“Plan”) for each of the described programs/initiatives.
2. Does KU track transmission-level SAIDI and CAIDI for individual substations served from its transmission system? If so, provide a comparison of the transmission-level SAIDI and CAIDI values for the company’s own substations versus foreign-served substations for the 2012-2016 period. Also, if available, provide a listing of the twenty (20) substations served from the KU/LG&E transmission system with the highest SAIDI and highest CAIDI values for each year from 2012 through 2016.
3. Please refer to KU’s Application, Tab 14, Testimony of Paul W. Thompson, Exhibit PWT-2, and related testimony. The Plan discusses the transition from an inspection-driven maintenance approach to an average five-year cycle.
  - a. Please provide the details of this average five-year cycle, including which line segments will be included in which years.
  - b. Please provide the year(s) the following line segments are included:
    - i. Elihu – Wofford
    - ii. Wofford – Park Plant
    - iii. Beattyville – West Irvine
    - iv. Loudon Avenue – Winchester
    - v. Harlan Wye – Dayhoit
  - c. Has KU already begun this transition?

4. The Plan discusses the installation of in-line circuit breakers, automated switches, motor-operated switches (MOS), or tap switches on long lines with multiple distribution stations in order to decrease customer exposure to transmission outages.

a. Please provide the details of this program, including where such devices will be installed and in what years.

b. Please confirm whether such devices will be installed at the following switch locations, in what year, and in what configuration:

- i. 573-625 and 573-635
- ii. 848-605
- iii. 93-625 and 93-635
- iv. 2-615 and 2-625
- v. 96-605 and 96-615
- vi. 536-615 and 536-625
- vii. 93-605 and 93-615
- viii. 20-675 and 20-695
- ix. 433-625 and 433-635
- x. 140-615 and 140-625
- xi. 768-605 and 768-635
- xii. 608-615
- xiii. 662-1 and 662-2
- xiv. 662-3 and 662-5
- xv. 676-9 and 676-11
- xvi. 403-625 and 403-635

xvii. 686-4 and 686-6

xviii. 175-605 and 175-615

c. Is the Pleasant Grove tap included in plans to improve automated sectionalization?

In what year? Please describe in detail.

d. Do the plans include addressing the 3-terminal location where the WHAS – Crestwood and Crestwood – Centerfield lines meet? In what year? Please describe

in detail.

e. Do the plans include eliminating the 3-terminal line connection at Dale – Avon – Boonesboro North? In what year? Please describe in detail.

f. Do the plans include eliminating the 3-terminal line connection for Tyner – Pittsburg – Laurel County? In what year? Please describe in detail.

g. Are there plans to add breakers on the Bonnieville transformer? In what year? Please describe in detail.

h. Are there plans to install breakers at the Stanford substation? In what year? Please describe in detail.

i. Are there plans to install breakers on the 161/69 kV transformers at the Elihu substation? In what year? Please describe in detail.

5. The Plan discusses the replacement of defective line equipment and overhead lines.

a. What defective equipment and line will be replaced on the Spencer Road to Salt Lick line? What percentage of the line equipment on this segment does this represent?

b. What defective equipment and line will be replaced on the Brush Creek – Carpenter line? What percentage of the line equipment on this segment does this represent?

- c. What defective equipment and line will be replaced on the Knob Creek – South Park line? What percentage of the line equipment on this segment does this represent?
  - d. What defective equipment and line will be replaced on the WHAS – Centerfield – Crestwood line? What percentage of the line equipment on this segment does this represent?
  - e. Are there any plans to install static wire on circuits where none exist? If so, please describe in detail. Please also state whether such plans include the Somerset North – Stanford line, and in what year (if applicable).
6. The Plan discusses the replacement of control houses.
- a. Will the control house at the Lynch substation be replaced? In what year?
7. The Plan discusses the replacement of relay panels.
- a. Will there be changes to the relaying package at Blue Lick? In what year? Please describe in detail.
  - b. Will there be changes to the relaying package at Hardinsburg? In what year? Please describe in detail.
8. In addition to the programs mentioned in the Plan, has consideration been given to other transmission service improvement options? Please describe in detail.
- a. Was consideration given to the acquisition of additional ROW on particularly problematic line segments such as the Elihu – Wofford circuit? Is this in the Plan? Please describe in detail.
  - b. Are there plans to add additional transmission lines into areas of the system where the additional lines do not provide strong voltage support and ease of load

restoration? The Rogersville area is an example. Please describe in detail any plans to strengthen the system in this area.

- c. What are KU's plans regarding installation of optical ground wire to support relaying and communications across line segments such as the Rowen – Rodburn line?

This 10<sup>th</sup> day of January, 2017.

Respectfully submitted,



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**CERTIFICATE OF SERVICE**

In accordance with 807 KAR 5:001, Section 8, the undersigned certifies that this document is a true and accurate copy of the same document being filed in paper medium; that the electronic filing has been transmitted to the Commission on January 10, 2017, and thereby served upon the parties via electronic transmission; and that there are currently no parties to this proceeding that the Commission has excused from participation by electronic means.



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*Counsel for East Kentucky Power Cooperative, Inc.*