COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

Electronic Application Of Kentucky Power Company For A Certificate Of Public Convenience And Necessity To Construct A 138 kV Transmission Line In Boyd County, Kentucky (EastPark 138 kV Transmission Line (Phase 1)	)))))	Case No. 2018-00072

APPLICATION

Kentucky Power Company moves the Public Service Commission of Kentucky pursuant to KRS 278.020(2), 807 KAR 5:001, Section 14, 807 KAR 5:001, Section 15, and 807 KAR 5:120 for a Certificate of Public Convenience and Necessity authorizing Kentucky Power: (1) to construct the approximately 2.7 mile EastPark 138 kV Transmission Line (Phase 1) in Boyd County, Kentucky; (2) to construct the new Moore Hollow 138 kV Substation near 297 South Commerce Drive in East Park Industrial Center in Boyd County, Kentucky; and (3) to upgrade certain facilities and equipment at Kentucky Power's existing Chadwick 138 kV Substation in Boyd County, Kentucky (the proposed transmission line, substation, and work at the Chadwick 138 kV Substation collectively constitute the "Project").

The Project will provide transmission electric service to the EastPark Industrial Center, including Braidy Industries Inc.'s planned aluminum mill (peak load of approximately 60 MW),[1] while improving distribution service to the general area. Kentucky Power is required under KRS 278.030(2) to provide adequate, efficient, and reasonable service to its customers. The Project, in conjunction with Phase 2, will enable the Company to meet that obligation.

[1] Braidy Industries' planned load of 60 MW would constitute the Company's second largest customer load.

In support of its application Kentucky Power states:

Applicant

1. Kentucky Power is a corporation organized on July 21, 1919 under the laws of the Commonwealth of Kentucky. The Company currently is in good standing in Kentucky.[2]

2. The post office address of Kentucky Power is 855 Central Avenue, Suite 200, Ashland, Kentucky 41101.[3] The Company's electronic mail address is kentucky_regulatory_services@aep.com.

3. Kentucky Power is engaged in the generation, purchase, transmission, distribution and sale of electric power. Kentucky Power serves approximately 166,700 customers in the following 20 counties of eastern Kentucky: Boyd, Breathitt, Carter, Clay, Elliott, Floyd, Greenup, Johnson, Knott, Lawrence, Leslie, Letcher, Lewis, Magoffin, Martin, Morgan, Owsley, Perry, Pike, and Rowan. Kentucky Power also supplies electric power at wholesale to other utilities and municipalities in Kentucky for resale. Kentucky Power is a utility as that term is defined at KRS 278.010.

4. Kentucky Power is a wholly-owned subsidiary of American Electric Power Company, Inc. ("AEP"). The AEP System is a multi-state public utility holding company system that provides electric service to customers in parts of eleven states: Arkansas, Indiana, Kentucky, Louisiana, Michigan, Ohio, Oklahoma, Tennessee, Texas, Virginia, and West Virginia.

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[2] A certified copy of the Company's Articles of Incorporation and all amendments thereto was attached to the Joint Application in *In the Matter Of: The Joint Application Of Kentucky Power Company, American Electric Power Company, Inc. And Central And South West Corporation Regarding A Proposed Merger*, P.S.C. Case No. 99-149. The Company's June 8, 2018 Certificate of Existence is filed as **EXHIBIT 1** of this Application.

[3] Kentucky Power also maintains a Regulatory Services office at 101A Enterprise Drive, P.O. Box 5190, Frankfort, Kentucky 40602-5190.

The Project

5. Kentucky Power seeks authority to construct an approximately 2.7 mile 138 kV single circuit (three phase) transmission line beginning at a point on the Company's existing Chadwick-Kentucky Electric Steel 138 kV circuit near the I-64/ U.S. 60 exit (Exit 181) and the Kentucky Electric Steel plant. The line then proceeds generally in a northwesterly direction approximately 2.7 miles to the location of the Company's proposed Moore Hollow 138 kV Substation. The Project will provide 138 kV service to the EastPark Industrial Center, including the planned Braidy Industries facility, and will improve distribution service to the general area. A map of the Project location is attached as **EXHIBIT 2**. Maps of suitable scale that meet the requirements of 807 KAR 5:120, Section 2(2) and that detail the proposed centerline are attached as **EXHIBIT 4**.[4]

6. The Project also includes the construction of the Moore Hollow 138 kV Substation to be located near 297 South Commerce Drive in the EastPark Industrial Center. Further details regarding the proposed Moore Hollow 138 kV Substation, and its components, are provided in the testimony of Company Witness Lasslo.

7. Remote work involving upgrades to certain equipment and facilities at the Company's existing Chadwick 138 kV Substation is a part of the Project. The Chadwick 138 kV Substation is located near Alley Branch Road, Catlettsburg, Kentucky, in Boyd County, Kentucky. Further details regarding the proposed upgrades to Chadwick 138 kV Substation are provided in the testimony of Company Witness Lasslo.

[4] The maps show a preferred centerline and do not illustrate the actual design. Kentucky Power will supplement its filing with maps certified in accordance with KRS 322.340 once the Project is in service.

The Facilities To Be Constructed

A. The Proposed 138 kV Transmission Line

8. The proposed 138 kV transmission line will connect to the Company's existing Chadwick-Kentucky Electric Steel 138 kV circuit at a point near the I-64/ U.S. 60 interchange (Exit 181) that is located approximately 450 feet to the southwest of the existing substation at the Kentucky Electric Steel plant. The route of the proposed line was developed using eleven study segments. From its tap point at the existing Chadwick-Kentucky Electric Steel 138 kV circuit the route of the proposed line proceeds on Segment 1 for approximately 0.2 miles to the northwest across U.S. 60 and the I-64 interchange ramps. It next proceeds first west and then north for 0.9 miles utilizing Segment 3 to avoid residential development and the Boyd County Fairgrounds to the east and the FastPitch Sports Complex to the west. This segment crosses Addington Road. The line then continues north and then northwest on Segment 5 for 0.6 miles, crossing Straight Creek Road and avoiding residential development to the southwest. From here the line proceeds for 0.8 miles to the northwest on Segment 7, crossing Buena Vista Drive, and then turns to the west for 0.2 miles on Segments 7 and 9 to enter the proposed Moore Hollow 138 kV Substation. (Map 3 of **EXHIBIT 21** (the Siting Study) to this application illustrates the segments constituting the proposed route.)

9. Further information regarding the route of the proposed 138 kV transmission line and its siting is included in the testimony of Mr. Reese. The centerline and 100 foot right-of-way (fifty feet on each side of the centerline) cross 13 parcels owned by 11 distinct landowners. The path of the proposed centerline and the identity of landowners owning property within the right-of-way are provided by **EXHIBITS 4 AND 6** respectively.

B. The Structures, Conductors, And Groundwires

10. Structure types will be determined during final engineering, which includes a ground survey and geotechnical studies. Nevertheless, based on preliminary engineering, the Company anticipates using a total of fourteen 138 kV single-circuit, galvanized steel structures: (a) three custom monopoles; (b) six H-Frame structures; and (c) five lattice towers. The specific number and type of structures used will depend on the terrain, spans, turning angles, and other engineering considerations. The average above ground height of the proposed structures will be approximately 90 feet. Illustrations of the currently anticipated proposed single-circuit structures are attached hereto as **EXHIBIT 7** (typical monopole structure), **EXHIBIT 8** (typical lattice tower structure), AND **EXHIBIT 9** (typical H-frame structure).[5]

11. The proposed single-circuit structures will support one conductor and two overhead groundwires. Three 1,033,500 cm ACSR 54/7 kcm ACSR (Curlew) conductors (one for each phase) will be used. The overhead groundwires will consist of one 7 # 8 Alumoweld wire and one 0.646 inch diameter 96 count fiber optic overhead groundwire, which will be used for communication between stations.

C. Substation Work

12. The Moore Hollow 138 kV Substation will be located in the EastPark Industrial Center approximately 1,000 feet from 297 South Commerce Drive. The proposed location is one of four possible substation sites examined by Kentucky Power. The Moore Hollow 138 kV Substation will be located behind a currently empty commercial building and was determined to be the optimal site with regard to location, visibility, topography, and access. The Moore Hollow 138 kV Substation will serve as a transmission service delivery point to industrial

[5] The structure exhibit drawings are conceptual representative sketches and not actual designs. Kentucky Power will supplement its filing with plans certified in accordance with KRS 322.340 once the Project is in service.

customers at EastPark Industrial Center, and is required to step down the voltage and provide protection and controls to serve industrial customers.

13. Kentucky Power is proposing to install the following major equipment at the Moore Hollow 138 kV Substation:

- Four 138 kV transmission line positions in a modified breaker and a half layout utilizing six 138 kV circuit breakers (3000A 40 kA) to sectionalize the transformer and transmission line component at the station;
- One 138/34.5 kV Transformer (30 MVA) and a standard 34.5 kV right hand rural distribution structure with three 34.5 kV distribution feeder positions to provide distribution service to customers at the industrial center along with customers served out of the Princess station;
- One 57.6 MVAR capacitor to provide voltage support to the area;
- One 16' x 36' mirrored base drop-in control module (DICM) to house the associated protection and controls and telecommunications equipment for the station.

The location and layout sheet for the proposed Moore Hollow 138 kV Substation is attached as **EXHIBIT 10** to this application.

14. The Chadwick 138 kV Substation improvements consist of replacing an existing relay panel with an upgraded version. The Chadwick 138 kV Substation upgrade will provide required protection and controls associated with the Project. The proposed layout and location sheet for the Chadwick 138 kV Substation is included as **EXHIBIT 11** to this application. All work at the Chadwick 138 kV Substation will take place within the existing substation footprint.

Financial Aspects Of The Project

15. The total functional estimate of the Project cost is approximately $22.4 million. That sum consists of: (a) approximately $8.4 million for transmission line work including right-of-way acquisition; (b) approximately $13.6 million for construction of the Moore Hollow 138 kV Substation; and (c) $0.4 million for remote work at the existing Chadwick 138 kV

Substation. The Project does not involve sufficient capital outlay to affect the existing financial condition of Kentucky Power. Kentucky Power anticipates funding the cost of the Project through its operating cash flow and other internally generated funds.

16. Kentucky Power projects the annual operating cost will be approximately $7,000 for general maintenance and inspection. The projected annual additional ad valorem taxes resulting from the Project are expected to total approximately $158,000.

Property Acquisition

17. The proposed Moore Hollow 138 kV Substation will be constructed on an approximately five acre parcel to be acquired from Braidy Industries. The approximately five acre tract will enable the Company to locate the substation so as to provide adequate safety clearances, to provide required ingress and egress, to permit grading and cut-fill work, and to provide for future expansion of the substation.

18. No right-of-way acquisition or property acquisition related to the Chadwick 138 kV Substation work is anticipated.

19. The 2.7 mile EastPark 138 kV Transmission Line (Phase 1) is new construction. The required transmission service cannot as a practical matter be provided by rebuilding existing transmission lines. A map of the Company's present system and the Project components is attached as **EXHIBIT 3**.

20. Kentucky Power anticipates acquiring right-of-way for the proposed line that is 100 feet in width (50 feet on each side of the centerline) for the length of the centerline. One hundred feet is typical of the right-of-way employed for 138 kV transmission lines in similar terrain. Based upon the results of final engineering, survey work, or issues encountered during construction, Kentucky Power may be required to obtain a wider right-of-way.

21. Kentucky Power to date has identified one area where a 130-foot right-of-way will be required. Company Witness Lasslo provides additional information on the expanded right-of-way and the circumstances under which additional expanded right-of-way may be required.

22. To ensure the ability to address potential issues that may emerge in connection with ground surveys, final engineering, and right-of-way negotiations, Kentucky Power requests authority to move the illustrated centerline and right-of-way, and to expand the right-of-way, within the Filing Corridor illustrated on **EXHIBIT 4**. The Filing Corridor is defined as 250 feet on each side (500-foot corridor) of the proposed centerline.

23. Kentucky Power's request to move the centerline and right-of-way, or to expand the right-of-way, within the Filing Corridor is expressly contingent upon: (1) Kentucky Power having notified the property owner onto whose property the line is moved of this proceeding in accordance with 807 KAR 5:120, Section 2(3); and (2) the written agreement of the property owner who is subject to the move or expansion. After construction is completed, Kentucky Power will file with the Commission a revised plan showing the final location of the transmission line and structures. The authority sought in this proceeding is similar, but not identical, to that granted Kentucky Power by the Commission in its Order dated the January 26, 2012 in Case No. 2011-00295.[6]

24. The Filing Corridor includes 21 parcels. A list of 18 distinct landowners owning property within the Filing Corridor is provided as **EXHIBIT 12**. Kentucky Power worked with affected property owners where requested to make adjustments to the proposed route as part of its development of the route.

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[6] *In the Matter of: The Application Of Kentucky Power Company For A Certificate Of Public Convenience And Necessity To Construct A 138 KV Transmission Line In and Associated Facilities in Breathitt, Knott and Perry Counties, Kentucky (Bonnyman-Soft Shell Line).*

25. Kentucky Power currently is negotiating with the affected property owners for acquisition of the necessary rights-of-way. Kentucky Power contacted all affected property owners the Company identified from the records of the property valuation administrator in developing the proposed route, as well as in connection with obtaining permission to survey the proposed route. The survey permission form includes a space in which the property owner may register opposition to the Project. No property owners located within the filing corridor have opposed the Project to date. The status of negotiations for acquisition of the necessary rights-of-way is set forth in more detail in **EXHIBIT 13** of this application. Kentucky Power plans to begin negotiating with the affected property owners for acquisition of the required rights-of-way in July 2018 and expects to complete acquisition by the fourth quarter of 2018. Kentucky Power will provide beginning on or about August 31, 2018 monthly property acquisition status updates in the format employed in **EXHIBIT 14**.

Notices

26. On February 19, 2018 Kentucky Power filed its Notice of Intent in conformity with 807 KAR 5:120, Section 1. Kentucky Power notified the Commission in writing on April 2, 2018 that it would file this application on or before June 29, 2018. June 29, 2018 is within the period provided by 807 KAR 5:120, Section 1(1) for filing an application following the February 19, 2018 Notice of Intent.

27. Kentucky Power provided the notice required by 807 KAR 5:120, Section 2(3) to all property owners, as indicated by the records of Boyd County Property Valuation Administrator, whose land is included within the Filing Corridor ("Affected Landowners").

28. The notice required by 807 KAR 5:120, Section 2(3) was provided by a mailing on June 18, 2018 to all Affected Landowners within the Filing Corridor. The June 18, 2018 Notice included the following information:

a. notice of the proposed construction;

b. the docket number (P.S.C. Case No. 2018-00072) under which the application will be processed;

c. the address and telephone number of the Commission's Executive Director;

d. a description of the property owners' rights to request a public hearing and the right to request intervention; and

e. a description of the Project and a map of the transmission line route.

29. A sample copy of the June 18, 2018 Notice is attached as part of **EXHIBIT 15.** The list of the persons to whom the Notice was mailed, their addresses as indicated by the records of the Boyd County Property Valuation Administrator, and the verification by Vicki L. Stone of the mailing of the letters are attached as **EXHIBIT 15**.

30. The notice required by 807 KAR 5:120, Section 2(5) was published June 20, 2018 in the Ashland *Daily Independent*. The published notice included the following information:

a. a description of the Project;

b. the docket number (P.S.C. Case No. 2018-00072) under which the application will be processed;

c. the address and telephone number of the Commission's Executive Director;

d. a description of the property owners' rights to request a public hearing and the right to request intervention; and

e. a map illustrating the route of the proposed transmission line.

The notice published in the *Daily Independent* is attached as **EXHIBIT 16.** An Affidavit of Publication is attached as **EXHIBIT 17**.

Franchises And Permits

31. Kentucky Power is not required to obtain a franchise from any public authority. *Cf.* 807 KAR 5:001, Section 15(2)(b).

32. Prior to beginning Project construction, Kentucky Power will obtain all required environmental compliance permits and complete the required studies. Work on preliminary environmental surveys and non-environmental permits has begun for the proposed right-of-way, access roads, and laydown yard associated with the Project. A complete list and summary of the environmental surveys and permitting, and non-environmental permitting completed or anticipated to be required is described in Mr. Reese's testimony filed with this application. These permits are typical for transmission line projects and the Company does not anticipate any permitting issues, risks, or delays. Attachment D to the Siting Report (**EXHIBIT 21** to this application) contains the agency correspondence to date regarding permits and other agency approvals. Following receipt of the requested authority, and completion of final design and right-of-way acquisition, but prior to the beginning of construction, Kentucky Power will update or supplement the listing in Mr. Reese's testimony of required environmental surveys or permitting.

33. The Company also will timely submit the final line design to the Federal Aviation Administration and the Kentucky Transportation Cabinet to secure a "Determination of No Hazard to Air Navigation." Other permits that will be obtained include road and railroad crossing permits. These will be submitted to the Commission once final engineering has been completed.

The Proposed Construction Is Required By The Public Convenience And Necessity

34. The Project is required by the public convenience and necessity. The need for the Project is described in detail in the testimony of Company Witness Lasslo filed with this application.

35. Kentucky Power has an obligation under KRS 278.030(2) to provide adequate, efficient, and reasonable service to its customers.[7] Encompassed within this duty is the requirement that a utility make reasonable extensions of its facilities to provide the required service.[8]

36. The project is required to provide 138 kV service to EastPark Industrial Center, including the planned Braidy Industries Inc. facility. Publicly available information indicates that Braidy Industries plans to construct a 2.5 million square-foot, fully integrated aluminum rolling mill in the EastPark Industrial Center that will be the most technologically advanced mill in the United States. The Braidy Industries website further indicates that the $1.3 billion investment will generate up to 1,000 jobs during its construction and approximately 500 full-time

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[7] *See* Order, *In the Matter of: Application Of Kentucky Power Company For A Certificate Of Public Convenience And Necessity To Construct A 138 kV Transmission Line In Floyd County, Kentucky*, Case No. 2007-00155 at (Ky. P.S.C. August 3, 2007) ("Kentucky Power is obligated under KRS 278.030(2) to provide 'adequate, efficient and reasonable service' to its customers within its service territory. Equitable's subsidiary, Equitable Gathering, will create an additional 24 MW load on Kentucky Power's system beginning in March 2008, by the addition of five natural gas compressor motors at its Maytown Compressor Station. The existing 46 kV system in the Langley area is not sufficient to serve this new load, and upgrading the system to 69 kV or tapping onto the nearby 765 kV AEP line are both too expensive and could not be completed in time for Kentucky Power to provide service to its customer. Other non-transmission options are not viable.")

[8] Order, *In the Matter of: The Tariff Filing Of South Anderson Water District Setting Policy For Water Main Extensions To Service Real Estate Developments*, Case No. 2006-00118 at 4 (Ky. P.S.C. August 16, 2007) (citing *City of Bardstown v. Louisville Gas And Electric Co*, 383 S.W.2d 918, 920 (Ky. 1964) ("We conceive that the duty of a public utility under the general public utility statutes is to render adequate, efficient and reasonable service . . . within the scope or area of service provided for in its certificate of convenience and necessity. . . . It can be compelled to make any reasonable extension of its service facilities within its certificated scope or area of service.") and (Ky. Att'y. Gen. Op. 75-719 ("a water district is 'under an obligation to serve all inhabitants . . . within its geographical area of service as fixed under KRS 74.010 and defined by the certificate of convenience and necessity.'")

skilled labor and administrative positions once it is in operation. Kentucky Power is informed that the peak load for the proposed Braidy Industries facility will be approximately 60 MW.

37. Kentucky Power's existing transmission and distribution system in the area cannot support this additional load; there are no other reasonable electrical alternatives to the Project. The Project is the most efficient and cost-effective means of providing the required service.

38. The EastPark Industrial Center, including the site of the proposed Braidy Industries facility, lies within Kentucky Power's certified territory. KRS 278.018(1) and KRS 278.018(4) prohibit any other retail electric supplier from providing retail electric service to EastPark Industrial Center and the proposed Braidy Industries facility. Absent the construction of the Project, the proposed Braidy Industries facility will lack the required electrical service to permit it to operate, thereby jeopardizing the planned $1.3 billion investment, the expected jobs, as well as consequent economic activity.

39. The Project also will strengthen distribution service by improving reliability to distribution customers currently served out of Princess Substation.

40. The Project will not compete with any public utilities, corporations, or persons, and will not result in a duplication of facilities.

Alternate Routes Considered

41. Kentucky Power retained the services of GAI Consultants, Inc. to develop and evaluate alternative transmission line routes for the proposed EastPark 138 kV Transmission Line (Phase 1). GAI prepared a Siting Study in which it evaluated the environmental suitability and feasibility of the Project, as well as the alternative routes that were reviewed. A copy of the Siting Study for the EastPark 138 kV Transmission Line (Phase 1) prepared by GAI is attached to this application as **EXHIBIT 21**. A detailed description of the siting methodologies employed

is provided in Section 2 of the Siting Study; Sections 3 and 4 of the Siting Study address the study area constraints, the development of alternative routes, and provide a comparison of the alternative routes. The siting methodology and permitting requirements also are addressed in Mr. Reese's testimony.

42. GAI employed a 6.75 square mile study area in Boyd County, Kentucky to develop and evaluate alternatives. The study area is bounded on the south by the Boyd County – Carter County line, on the west by the Boyd County – Greenup County line, on the north by a point approximately 0.1 miles north of the proposed Moore Hollow 138 kV Substation, and on the east by the valley of Williams Creek. The study area is dominated by undeveloped land on former surface mining sites, forested areas on slopes, and scattered residential development located along roadways in two intervening valley bottoms. A map of the study area is attached as **EXHIBIT 18**.

43. GAI, in conjunction with Kentucky Power, identified four alternative routes for the proposed line. The four alternative routes are identified on **EXHIBIT 5** to this Application and Map 4 of the Siting Study. Based upon siting guidelines developed jointly by Kentucky Power and GAI, Alternative D was selected as the Proposed Route. Alternative D is the shortest alternative, thereby reducing the potential for impacts. The Proposed Route also presented the greatest constructability advantages, including requiring the fewest number of access roads, fewest structures, and fewest angles. Alternative D, which crosses the fewest number of parcels was not opposed by any landowners. In addition, the Proposed Route had the second fewest residences (four) within 250 feet, required the least amount of forest clearing, and had the fewest stream crossings of the four alternatives.

Reviews And Stakeholder Input

44. Kentucky Power, working in conjunction with GAI, solicited and received local stakeholder input. Meetings were conducted with representatives of Boyd and Greenup counties, as well as local landowners. In addition, a public open house was held on February 20, 2018 at the Ashland Community and Technical College campus located in EastPark Industrial Center. Through these efforts, Kentucky Power and GAI worked with local stakeholders to identify and resolve siting and other concerns. Further details concerning efforts to solicit and respond to local stakeholder input is provided in the testimony of Mr. Reese.

45. The Company also will provide information on or before June 30, 2018 about the Project to PJM Interconnection LLC ("PJM") and the stakeholders participating in PJM's Transmission Expansion Advisory Committee ("TEAC"). The Project constitutes a change in the topology of the transmission grid and thus is subject to the Regional Expansion Transmission Plan ("RTEP") review process described in PJM's Open Access Transmission Tariff in effect with the Federal Energy Regulatory Commission and PJM's operation manuals, consistent with PJM's FERC-approved operating agreement. The Project, which will provide an interconnection to a Kentucky Power customer, is classified as a "Supplemental" project as defined in PJM's operating agreement. Kentucky Power is not required to obtain approval of the Project from either PJM or the TEAC.

46. Representatives of Kentucky Power have contacted each of the 18 owners of the 21 parcels within the filing corridor. None of the 18 owners have expressed opposition to the Project to date.

Commencement Of Work And Anticipated In-Service Date

47. Kentucky Power anticipates commencing work, subject to the grant of the requested authority, in the first quarter of 2019. The anticipated in-service date for the project is June 2020.

Exhibits And Testimony

48. The exhibits and testimony listed in the Appendix to this application are attached to and made a part of this application.

Communications

49. Kentucky Power respectfully requests that communications in this matter be addressed to the e-mail addresses identified on Kentucky Power's February 19, 2018 Notice of Election of Use of Electronic Filing Procedures.

Filing Requirements

50. Kentucky Power's compliance with the requirements of 807 KAR 5:001, Section 14, 807 KAR 5:001, Section 15, and 807 KAR 5:120 is detailed in **EXHIBIT 20** to the application.

WHEREFORE, Kentucky Power Company respectfully requests that the Commission issue an Order:

(a) Granting Kentucky Power a Certificate of Public Convenience and Necessity for the Project authorizing the construction of the EastPark 138 kV Transmission Line (Phase 1); authorizing the construction of the Moore Hollow 138 kV Substation; and authorizing

the remote work at the Company's existing Chadwick 138 kV Substation; and

(b) Granting Kentucky Power such other relief as may be appropriate.

Respectfully submitted,

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APPENDIX

TESTIMONY

DIRECT TESTIMONY OF RANIE K. WOHNHAS ..... Regulatory Information

DIRECT TESTIMONY OF MICHAEL G. LASSLO ..... Project Need

DIRECT TESTIMONY OF GEORGE T. REESE ..... Transmission Line Siting

DIRECT TESTIMONY OF KAMRAN ALI .....PJM Review

LIST OF EXHIBITS

EXHIBIT 1: June 8, 2018 Certificate of Existence.

EXHIBIT 2: Project location map.

EXHIBIT 3: Map of present system and project components.

EXHIBIT 4: Maps of suitable scale that meet the requirements of 807 KAR 5:120, Section 2(2).

EXHIBIT 5: Maps illustrating alternative routes.

EXHIBIT 6: List of landowners of parcels within the proposed right-of-way.

EXHIBIT 7: Illustrations of typical monopole structure.

EXHIBIT 8: Illustrations of typical lattice tower structure.

EXHIBIT 9: Illustrations of typical H-frame structure.

EXHIBIT 10: Moore Hollow 138 kV Substation location and layout.

EXHIBIT 11: Chadwick 138 kV Substation layout and location.

EXHIBIT 12: List of landowners within the filing corridor.

EXHIBIT 13: Status of rights-of-way acquisition.

EXHIBIT 14: Property acquisition update format.

EXHIBIT 15: Affected landowner notice and verification.

EXHIBIT 16: Notice published June 20, 2018 in *Ashland Daily Independent*.

EXHIBIT 17: Affidavit of publication.

EXHIBIT 18: Map of study area.

EXHIBIT 19: Photographs from February 20, 2018 open house.

EXHIBIT 20: Filing requirements.

EXHIBIT 21: GAI Consultants, Inc. siting study.