

VERIFICATION

STATE OF OHIO                    )  
  )     SS:  
COUNTY OF HAMILTON         )

The undersigned, Marc A. Bell, Lead Engineer, being duly sworn, deposes and says that he has personal knowledge of the matters set forth in the foregoing data requests, and that the answers contained therein are true and correct to the best of his knowledge, information and belief.

Marc A. Bell  
Marc A. Bell Affiant

Subscribed and sworn to before me by Marc A. Bell on this 9<sup>th</sup> day of October, 2019.

E. Minna Rolfes-Adkins  
NOTARY PUBLIC

My Commission Expires: July 8, 2022

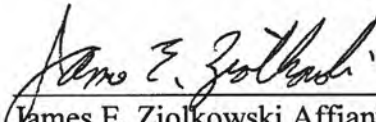


**E. MINNA ROLFES-ADKINS**  
Notary Public, State of Ohio  
My Commission Expires  
July 8, 2022

**VERIFICATION**

STATE OF OHIO                    )  
  )  
COUNTY OF HAMILTON        )        SS:

The undersigned, James E. Ziolkowski, Director, Rates & Regulatory Planning, being duly sworn, deposes and says that he has personal knowledge of the matters set forth in the foregoing data requests, and that the answers contained are true and correct to the best of his knowledge, information and belief.

  
\_\_\_\_\_  
James E. Ziolkowski Affiant

Subscribed and sworn to before me by James E. Ziolkowski on this 10<sup>th</sup> day of October, 2019.



SHELIA J. ROGERS  
Notary Public, State of Ohio  
My Commission Expires 10-17-2022

  
\_\_\_\_\_  
NOTARY PUBLIC

My Commission Expires: 10-17-2022

**VERIFICATION**

STATE OF OHIO                    )  
  )     SS:  
COUNTY OF HAMILTON        )

The undersigned, Jeff O. Turner, Principal Engineer, being duly sworn, deposes and says that he has personal knowledge of the matters set forth in the foregoing data requests, and that the answers contained therein are true and correct to the best of his knowledge, information and belief.

  
\_\_\_\_\_  
Jeff O. Turner Affiant

Subscribed and sworn to before me by Jeff O. Turner on this 9<sup>th</sup> day of October, 2019.

  
\_\_\_\_\_  
NOTARY PUBLIC

My Commission Expires: July 8, 2022




**VERIFICATION**

STATE OF OHIO                    )  
  )     SS:  
COUNTY OF HAMILTON        )

The undersigned, John Hurd, Lead Transmission Siting Specialist, being duly sworn, deposes and says that he has personal knowledge of the matters set forth in the foregoing data requests, and that the answers contained therein are true and correct to the best of his knowledge, information and belief.

  
\_\_\_\_\_  
John Hurd Affiant

Subscribed and sworn to before me by John Hurd on this 9 day of October,  
2019.

  
\_\_\_\_\_  
NOTARY PUBLIC

My Commission Expires: July 8, 2022

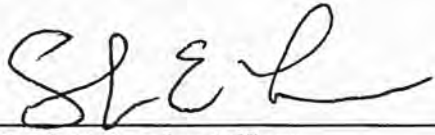


**E. MINNA ROLFES-ADKINS**  
Notary Public, State of Ohio  
My Commission Expires  
July 8, 2022


**VERIFICATION**

STATE OF OHIO                    )  
  )     SS:  
COUNTY OF HAMILTON        )

The undersigned, Sarah E. Lawler, Director Rates & Regulatory Planning, being duly sworn, deposes and says that she has personal knowledge of the matters set forth in the foregoing data requests, and that the answers contained therein are true and correct to the best of her knowledge, information and belief.

  
\_\_\_\_\_  
Sarah E. Lawler Affiant

Subscribed and sworn to before me by Sarah E. Lawler on this 4<sup>th</sup> day of October, 2019.

  
\_\_\_\_\_  
NOTARY PUBLIC

My Commission Expires: July 8, 2022



**E. MINNA ROLFES-ADKINS**  
Notary Public, State of Ohio  
My Commission Expires  
July 8, 2022

**VERIFICATION**

STATE OF OHIO                    )  
  )     SS:  
COUNTY OF HAMILTON        )

The undersigned, John K. Rogers, Lead Engineer, being duly sworn, deposes and says that he has personal knowledge of the matters set forth in the foregoing data requests, and that the answers contained therein are true and correct to the best of his knowledge, information and belief.

  
\_\_\_\_\_  
John K. Rogers Affiant

Subscribed and sworn to before me by John K. Rogers on this   9   day of   October  , 2019.

  
\_\_\_\_\_  
NOTARY PUBLIC

My Commission Expires:   July 8, 2022  



**E. MINNA ROLFES-ADKINS**  
Notary Public, State of Ohio  
My Commission Expires  
July 8, 2022

**VERIFICATION**

STATE OF OHIO                            )  
  )  
COUNTY OF HAMILTON                 )        SS:

The undersigned, Yanthi W. Boutwell, Director of Midwest Transmission Resource & Project Management, being duly sworn, deposes and says that she has personal knowledge of the matters set forth in the foregoing data requests, and that the answers contained therein are true and correct to the best of her knowledge, information and belief.

*Yanthi W. Boutwell*  
Yanthi W. Boutwell Affiant

Subscribed and sworn to before me by Yanthi W. Boutwell on this 8<sup>th</sup> day of October, 2019.

*E. Minna Rolfes-Adkins*  
NOTARY PUBLIC

My Commission Expires: July 8, 2022



**KyPSC Case No. 2019-00251**  
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**REQUEST:**

Refer to the application, paragraph 5, and the Direct Testimony of Edward F. Kirschner, page 5.

- a. Provide an estimation of the load growth related to the proposed transmission project for each year from 2019 through 2021.
- b. Provide the number of customers that Duke Kentucky has for each of the five years ended December 31, 2018, and as of June 30, 2019.
- c. Identify and explain the system reliability issues associated with Duke Kentucky's transmission and distribution systems that will be addressed by the proposed transmission project.

**RESPONSE:**

a. The estimated load growth related to the proposed transmission project are 5 MW for 2019, 35 MW for 2020 and 5 MW for 2021.

b. Following are the electric customer counts at December 31 and June 30:

Dec-2014	138,657
Dec-2015	139,182
Dec-2016	140,966
Dec-2017	142,278
Dec-2018	142,755
Jun-2019	142,745

c. In addition to providing a transmission circuit to serve the new Aero Substation, which will which will supply the Amazon Prime Air Hub and existing and

projected new load in the vicinity, the proposed transmission improvements associated with this new transmission circuit will reinforce the Duke Energy Kentucky 69 kV system. These reinforcements will improve reliability to Duke Energy Kentucky customers by eliminating a low capacity transmission circuit that is in need of being rebuilt for higher capacity, reconfiguring the transmission system to allow load to be reliably served under various transmission circuit outages and providing transmission capacity to serve future substations that will be required as load continues to grow in this area.

**PERSON RESPONSIBLE:**

Marc A. Bell – a.  
James E. Ziolkowski – b.  
Jeff O. Turner – c.

**Duke Energy Kentucky  
Case No. 2019-00251  
Staff First Set Data Requests  
Date Received: September 27, 2019**

**STAFF-DR-01-002**

**REQUEST:**

Refer to the application, paragraph 7, and Exhibit 6, page 6 of 60. Explain the discrepancy in the width of the right-of-way.

**RESPONSE:**

Exhibit 6, page 6 of 60 describes the standard right-of-way for 138-kilovolt (kV) transmission lines for Duke Energy Kentucky. Where the proposed transmission line is cross country, the standard right-of-way for new lines is 100 feet. Where the proposed transmission line parallels an existing road right-of-way, the standard right-of-way for new lines is 75 feet. The application in paragraph 7 describes the proposed right-of-way for the preferred route which parallels road right-of-way for its entire length and therefore is proposed at 75 feet.

**PERSON RESPONSIBLE:** John K. Hurd

**Duke Energy Kentucky  
Case No. 2019-00251  
Staff First Set Data Requests  
Date Received: September 27, 2019**

**STAFF-DR-01-003**

**REQUEST:**

Refer to the application, paragraph 28, the Direct Testimony of Yanthi W. Boutwell (Boutwell Testimony), page 13, and the Direct Testimony of Sarah E. Lawler, page 4. Explain in more detail how the transmission project will be financed with respect to the circumstances that would give rise to the use of debt instruments.

**RESPONSE:**

As both Ms. Lawler and Ms. Boutwell indicated in their testimony, the Company proposes to finance the construction of the project through continuing operations and, if necessary, through debt issuances.

The Company is not planning a discrete debt issuance specifically for this project, but rather evaluates the capital structure of Duke Energy Kentucky as a whole. The Company regularly reviews and monitors its current capital structure to ensure it is financing capital expenditures and ongoing operations in accordance with its regulatory capital structure as approved in the Company's last electric base rate case.

**PERSON RESPONSIBLE:** Sarah E. Lawler

**Duke Energy Kentucky  
Case No. 2019-00251  
Staff First Set Data Requests  
Date Received: September 27, 2019**

**STAFF-DR-01-004**

**REQUEST:**

Refer to the application, paragraph 29. Provide a breakdown of the total cost by the Federal Energy Regulatory Commission account number.

**RESPONSE:**

The estimated cost of the initial construction for the Project of approximately \$32.3 million is expected to be recorded to the following FERC Accounts:

- a) FERC Account 356: approximately \$2.1 million for the construction of the overhead line, including right-of-way acquisition;
- (b) FERC Account 362: approximately \$7.2 million for expansion and equipment at Oakbrook Substation; and
- (c) FERC Account 362: approximately \$23 million at Aero Substation.

The estimated annual ongoing cost of operations of approximately \$5,000 is expected to be recorded to FERC Account 571.

Final FERC accounting will be determined when the actual costs are incurred.

**PERSON RESPONSIBLE:** Sarah E. Lawler

**Duke Energy Kentucky  
Case No. 2019-00251  
Staff First Set Data Requests  
Date Received: September 27, 2019**

**STAFF-DR-01-005**

**REQUEST:**

Refer to the application, Exhibit 6, page 7 of 60, regarding the line route evaluation report prepared by Stantec Consulting Services Inc. (Stantec Report). Map ID 3 identifies "KY18 ACRES LLC" as the property owner of the tract of land north of the proposed route. Explain whether KY18 ACRES LLC was provided notice of the proposed transmission line route.

**RESPONSE:**

At the time of the line route evaluation study, KY18 ACRES LLC, was the property owner but at the time of filing the application the property ownership changed to Kenton County Airport Board. Kenton County Airport Board was provided notice as included Exhibit 10 of the Application.

**PERSON RESPONSIBLE:** John K. Hurd

**Duke Energy Kentucky  
Case No. 2019-00251  
Staff First Set Data Requests  
Date Received: September 27, 2019**

**STAFF-DR-01-006**

**REQUEST:**

Refer to the application, Exhibit 6, page 8 of 60. The Stantec Reports states that no public meeting to review the alternative routes was conducted given that Duke Kentucky had "willing landowners for the easements." Refer also to the application, Exhibit 10, pages 4-5 of 5. Confirm that the only property owners whose property the transmission line right-of-way is proposed to cross are Duke Kentucky, the Kenton County Airport Board, and the Union Light, Heat, and Power Company.

**RESPONSE:**

Duke Energy Kentucky has confirmed by overlaying the proposed route over the Boone County GIS parcel layer that the only property owners whose property the transmission line right-of-way is proposed to cross are Duke Kentucky, the Kenton County Airport Board, and the Union, Light, Heat, and Power Company.

**PERSON RESPONSIBLE:** John K. Hurd



**Duke Energy Kentucky  
Case No. 2019-00251  
Staff First Set Data Requests  
Date Received: September 27, 2019**

**STAFF-DR-01-007**

**REQUEST:**

Refer to the application, Exhibit 6, page 10 of 60, regarding the tree clearing and earthwork that has already occurred along the preferred route. Confirm that the tree clearing and the earthwork were not done in connection with the proposed transmission line. If confirmed, explain the nature of the tree clearance and earthwork that has already occurred.

**RESPONSE:**

The tree clearing and earthwork in progress is being completed by Amazon to support their construction of its Amazon Prime Air Hub facility at Cincinnati/Northern Kentucky International Airport. The areas where the majority of this new line is proposed will be located within Amazon's construction zone. The work that has been completed by Amazon is completely grubbing the site of trees. Earthwork is underway for their facilities to level the area where the hangers and facilities will be built and stockpiling material on site that will not be hauled off by Amazon.

**PERSON RESPONSIBLE:** John K. Hurd

**Duke Energy Kentucky  
Case No. 2019-00251  
Staff First Set Data Requests  
Date Received: September 27, 2019**

**STAFF-DR-01-008**

**REQUEST:**

Refer to the application, Exhibit 6, page 13 of 60, regarding the comparative evaluation of the four alternative routes. Explain in detail how Duke Kentucky and Stantec arrived at weights assigned to each of the Criteria Group.

**RESPONSE:**

The weights assigned to each of the Criteria Group were decided based on the combination of public feedback gathered on many projects over many years, project specific considerations, and the combined experience of the siting team for this project. Once the data was collected the siting team met to review previous projects weights and decide on weights that were appropriate for this project.

**PERSON RESPONSIBLE:** John K. Hurd

**Duke Energy Kentucky  
Case No. 2019-00251  
Staff First Set Data Requests  
Date Received: September 27, 2019**

**STAFF-DR-01-009**

**REQUEST:**

Refer to the application, Exhibit 6, page 19 of 60, regarding the statement that roadside siting is less optimal for transmission line voltages of 138 kV and above because of access constraints during construction and operations and the risk of the roadway being widened in the future necessitating in the relocation of the transmission line. Explain whether Duke Kentucky has engaged in any discussions with state or county officials regarding the potential for widening Burlington Pike and Aero Parkway in the future and also explain how Duke Kentucky intends to mitigate this risk given that the preferred route runs parallel to a roadway for a significant portion of the length of the route.

**RESPONSE:**

The centerline for the proposed Oakbrook to Aero transmission line is approximately 75 feet north of the edge of the Aero Parkway road right-of-way. Duke Energy Kentucky did meet with the Kentucky Transportation Cabinet in the summer of 2019 to discuss the project and the locations of the proposed transmission line does not appear to conflict with any known future road expansion projects on Aero Parkway or Burlington Pike.

**PERSON RESPONSIBLE:** John K. Hurd

**Duke Energy Kentucky  
Case No. 2019-00251  
Staff First Set Data Requests  
Date Received: September 27, 2019**

**STAFF-DR-01-010**

**REQUEST:**

Refer to the application, Exhibit 6, page 21 of 60, regarding the Stantec recommendations that Duke Kentucky remain in contact with municipal authorities and affected property owners to ensure that pole siting does not interfere with existing or proposed underground utilities and that Duke Kentucky coordinate with the appropriate roadway authorities to confirm that pole placement does not encroach on clear zones and that future road widening projects are taken into consideration. Explain how Duke Kentucky intends to carry out these recommendations.

**RESPONSE:**

Duke Energy Kentucky has been in contact with both the Kentucky Transportation Cabinet and Boone County about our proposed line along Aero Parkway (State Route 1017) or Burlington Pike (State Route 18) to verify there will be no conflicts with proposed development including road improvements and proposed underground utilities. We have also maintained steady contact with the site developer (Amazon) to verify the improvements they are planning (both site grading and proposed underground and overhead utilities) do not interfere with pole siting.

**PERSON RESPONSIBLE:** John K. Hurd

**Duke Energy Kentucky  
Case No. 2019-00251  
Staff First Set Data Requests  
Date Received: September 27, 2019**

**STAFF-DR-01-011**

**REQUEST:**

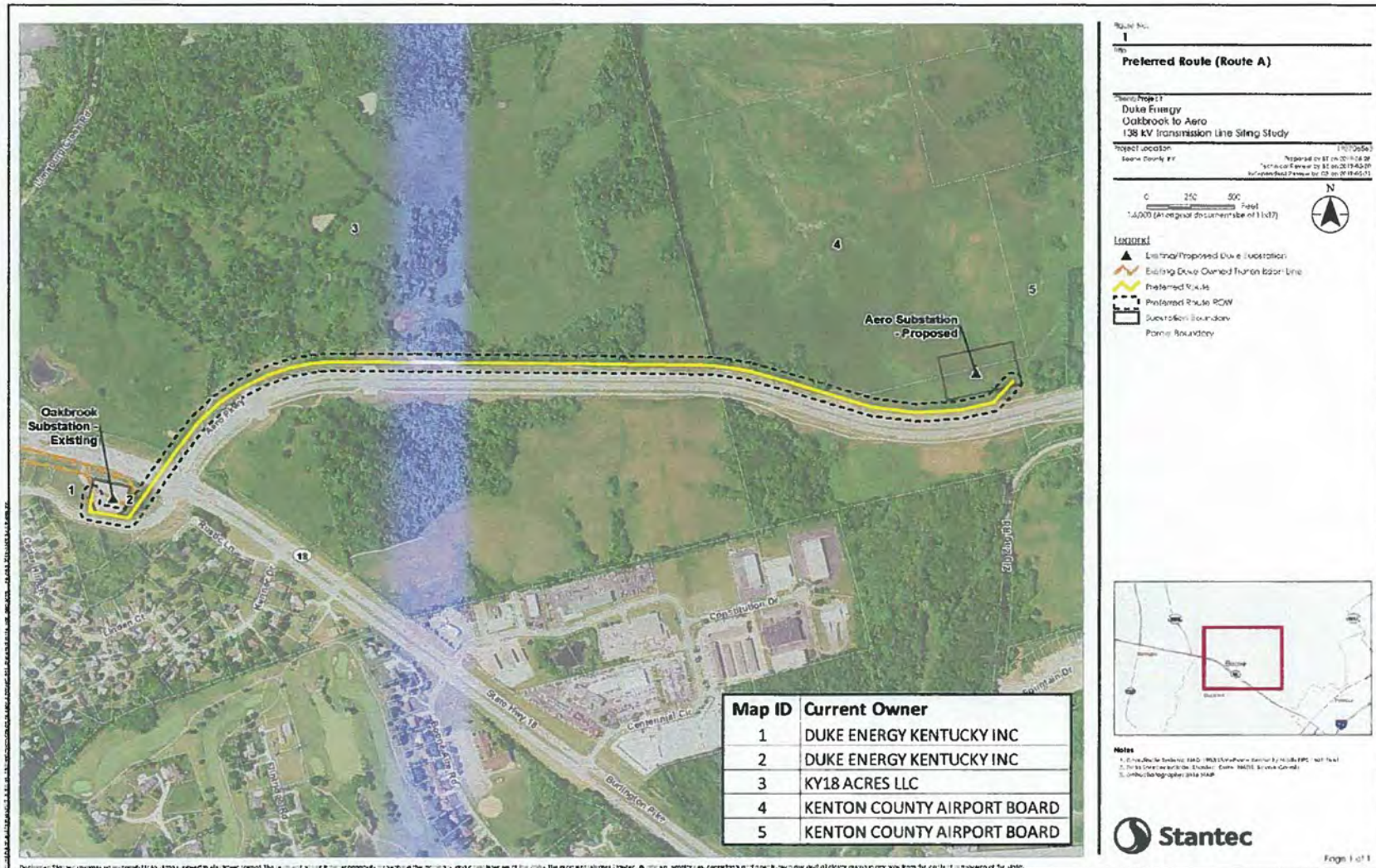
Provide in portable document format (PDF) the maps contained in Figures 1-6 of the Stantec Report that provides for a legible view of the markings and the legend. An oversized PDF document for each of the maps is acceptable.

**RESPONSE:**

The portable document format (PDF) of Figures 1 to 6 of the Stantec Report are attached as STAFF-DR-01-011 Attachment.

**PERSON RESPONSIBLE:** John K. Hurd

OAKBROOK TO AERO TRANSMISSION LINE PROJECT



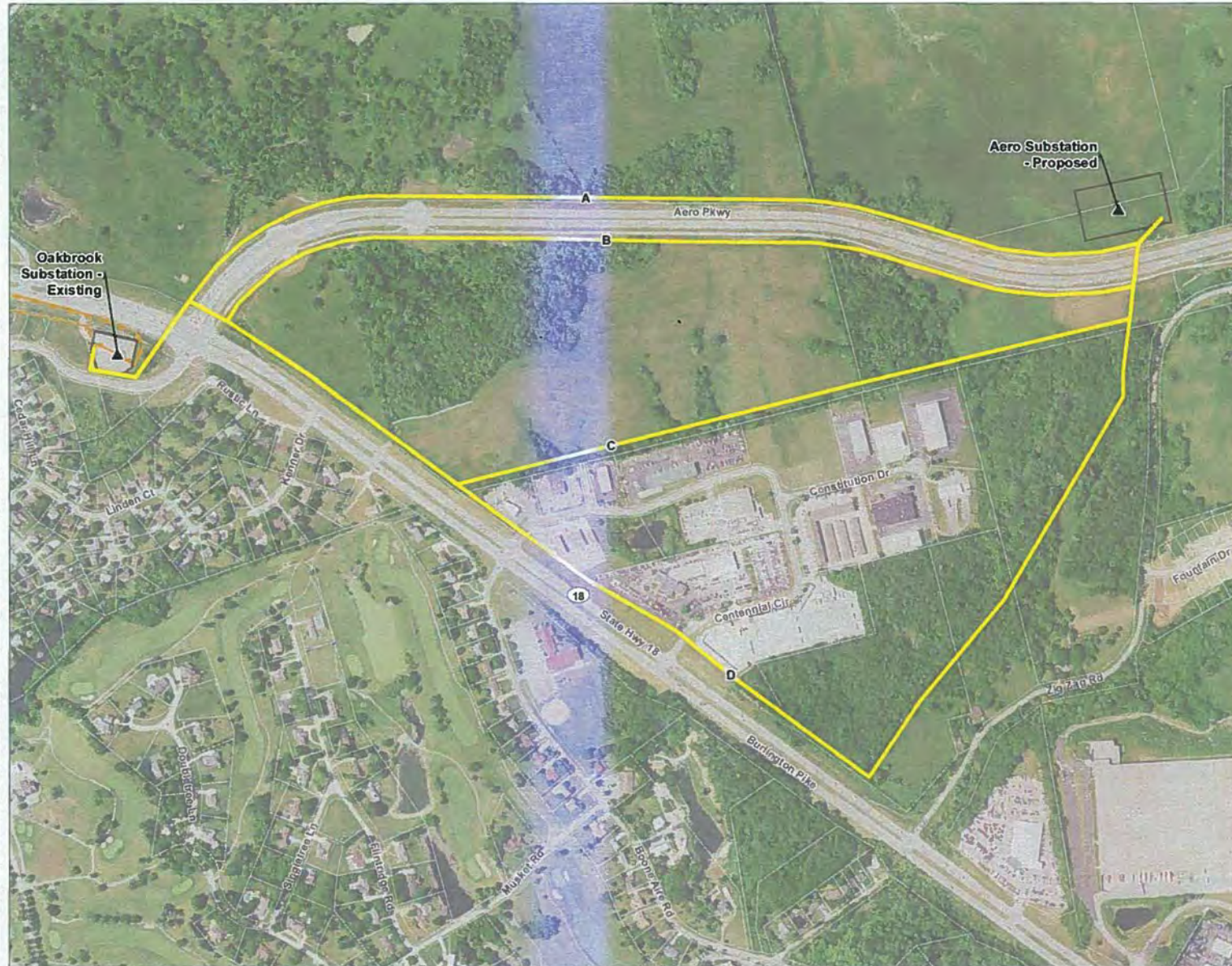


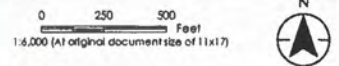
Figure No. **2**

Title  
**Alternative Routes**

Client/Project  
 Duke Energy  
 Oakbrook to Aero  
 138 KV Transmission Line Siting Study

Project Location  
 Boone County, KY

193706563  
 Prepared by BE on 2019-05-28  
 Technical Review by BE on 2019-05-28  
 Independent Review by CR on 2019-05-31



- Legend**
- ▲ Existing/Proposed Duke Substation
  - ~ Alternative Route
  - Existing Duke Owned Transmission Line
  - Substation Boundary
  - Parcel Boundary



- Notes**
1. Coordinate System: NAD 1983 StatePlane Kentucky North FIPS 1601 feet
  2. Data Sources include: Stantec, Duke, HADS, Boone County
  3. Orthophotography: 2016 NAD



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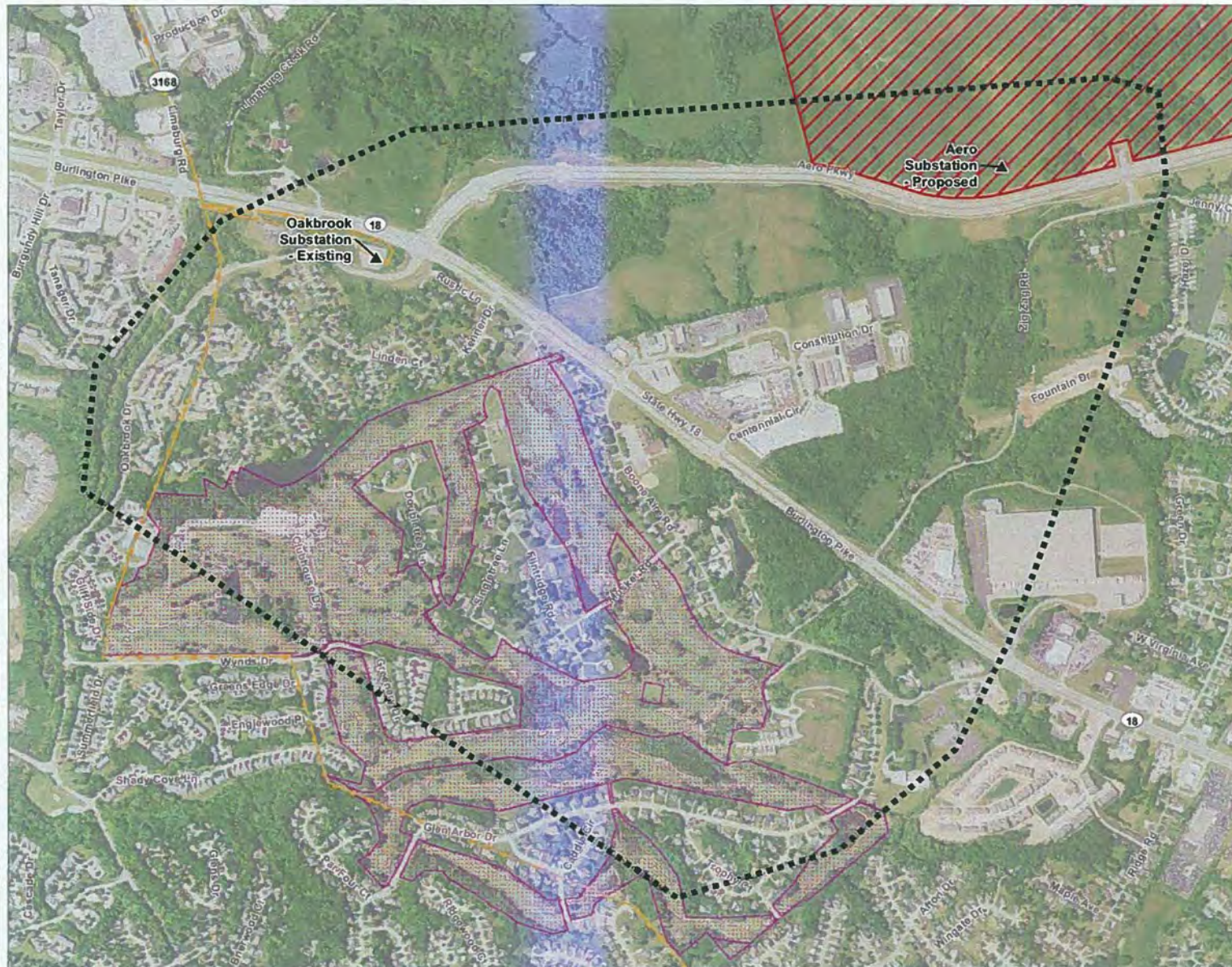


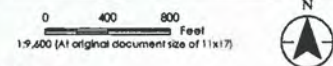
Figure No.  
**3**

**Title**  
 Study Area Map

**Client/Project**  
 Duke Energy  
 Oakbrook to Aero  
 138 kV Transmission Line Siting Study

**Project Location**  
 Boone County, KY

193706563  
 Prepared by BE on 2019-05-28  
 Technical Review by BE on 2019-05-28  
 Independent Review by CB on 2019-05-31



- Legend**
- ▲ Existing/Proposed Duke Substation
  - Existing Duke Owned Transmission Line
  - Study Area
  - ▨ Airport Property
  - ▨ Boone Links Golf Course



- Notes**
1. Coordinate System: NAD 1983 StatePlane Kentucky North FIPS 1401 Feet
  2. Data Sources include Stantec, Duke, NAD's Boone County
  3. Orthophotography: MAP 2014





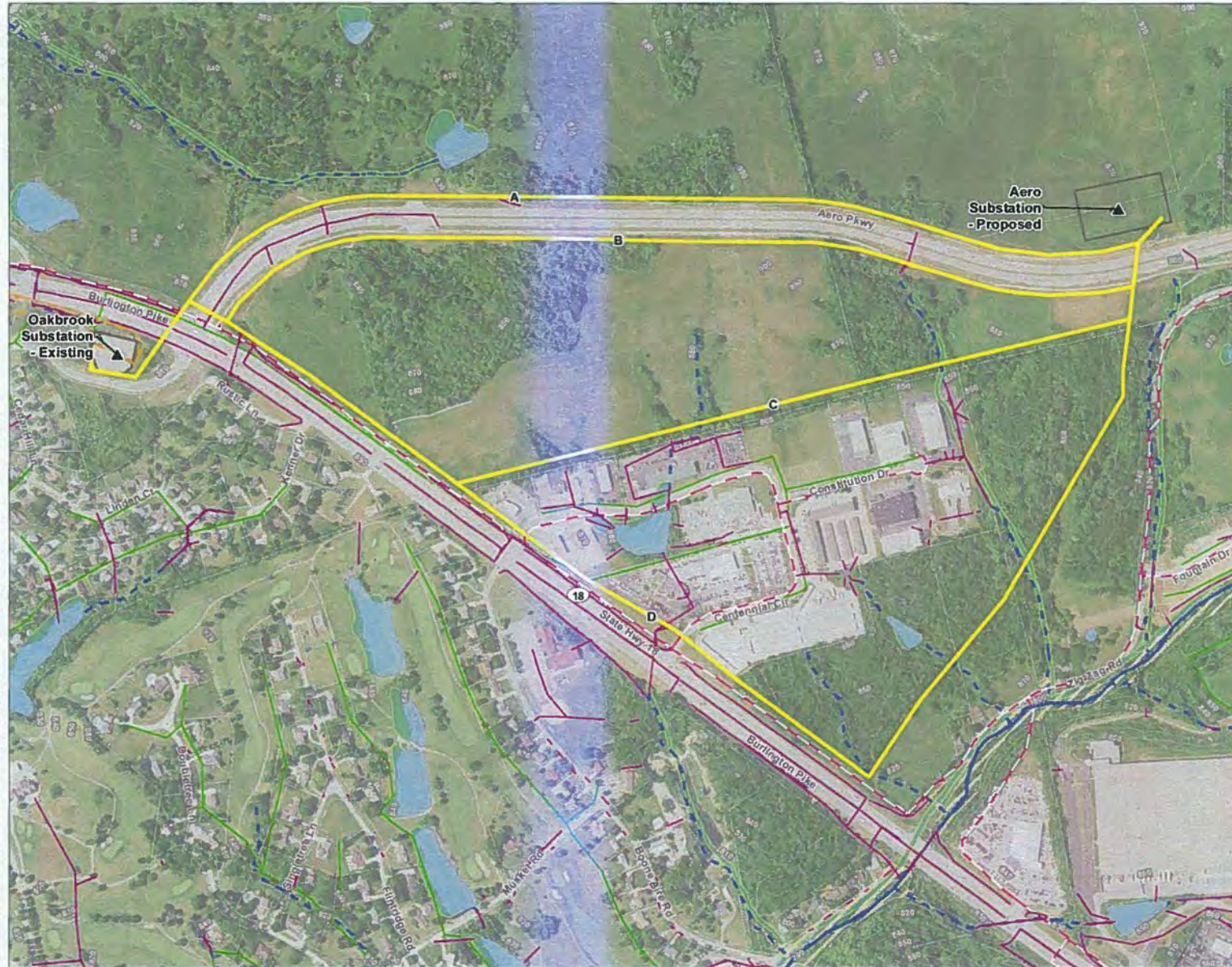


Figure No.

4

The  
**Environmental and Engineering  
 Constraints**

Client/Project  
 Duke Energy  
 Oakbrook to Aero  
 138 kV Transmission Line Siting Study

Project Location  
 Boone County, KY

192706563  
 Prepared by BE on 2018-05-28  
 Technical Review by BE on 2018-05-28  
 Independent Review by CB on 2019-05-31

0 250 500 Feet  
 1:6,000 (At original document size of 11x17)



**Legend**

- ▲ Existing/Proposed Duke Substation
- Yellow line Alternative Route
- Orange line Existing Duke Owned Transmission Line
- Black outline Substation Boundary
- Red dashed line Water Lines
- Purple dashed line Buried Storm Sewer Lines
- Green dashed line Sewer Line
- Blue dashed line 10ft Elevation Contours
- Black outline Parcel Boundary
- Green circle NW1 Wetlands
- Yellow shaded area FEMA Flood Hazard Areas
- Orange shaded area 100 Year Flood Zone
- Blue dashed line National Hydrography Dataset
- Blue dashed line Perennial
- Blue dashed line Intermittent
- Blue shaded area Waterbody



**Notes**

1. Coordinate System: NAD 1983 StatePlane Kentucky North FIPS 1601 Feet
2. Data Sources include: Stantec, Duke, HAD's USFWS, USGS, FEMA, Boone Co.
3. Orthophotography: 2016 NAD



Figure No.  
**5**

**Social and Land Use Constraints**

Client/Project  
 Duke Energy  
 Oakbrook to Aero  
 138 kV Transmission Line Siting Study

Project Location 193706563  
 Boone County, KY Prepared by E1 on 2019-05-28  
 Technical Review by E2 on 2019-05-28  
 Independent Review by C8 on 2019-05-31

0 300 400 Feet  
 1:7,200 (At original document size of 11x17)



**Legend**

- ▲ Existing/Proposed Duke Substation
- ⚡ Alternative Route
- ⚡ Existing Duke Owned Transmission Line
- ▭ Substation Boundary
- ▭ Parcel Boundary
- KHC Historic Structures (NHRP Undetermined)
- Aero Bike Trail
- ▨ Archaeological Site (NHRP not assessed)
- ▨ Airport Property
- ▭ Zoning District
- Cemetery
- ⊙ Place of Worship
- ⚡ Daycare
- ▭ Building Type
- ▭ Church
- ▭ Commercial
- ▭ Daycare
- ▭ Industrial
- ▭ Single Family Residential
- ▭ Multi-Family Residential



- Notes**
1. Coordinate System: NAD 1983 StatePlane Kentucky North FIPS 1601 Feet
  2. Data Sources Include: Stantec, Duke, HADS, EYOS\*, Boone Co., KHC, ESN
  3. Orthophotography: 2016 NAB



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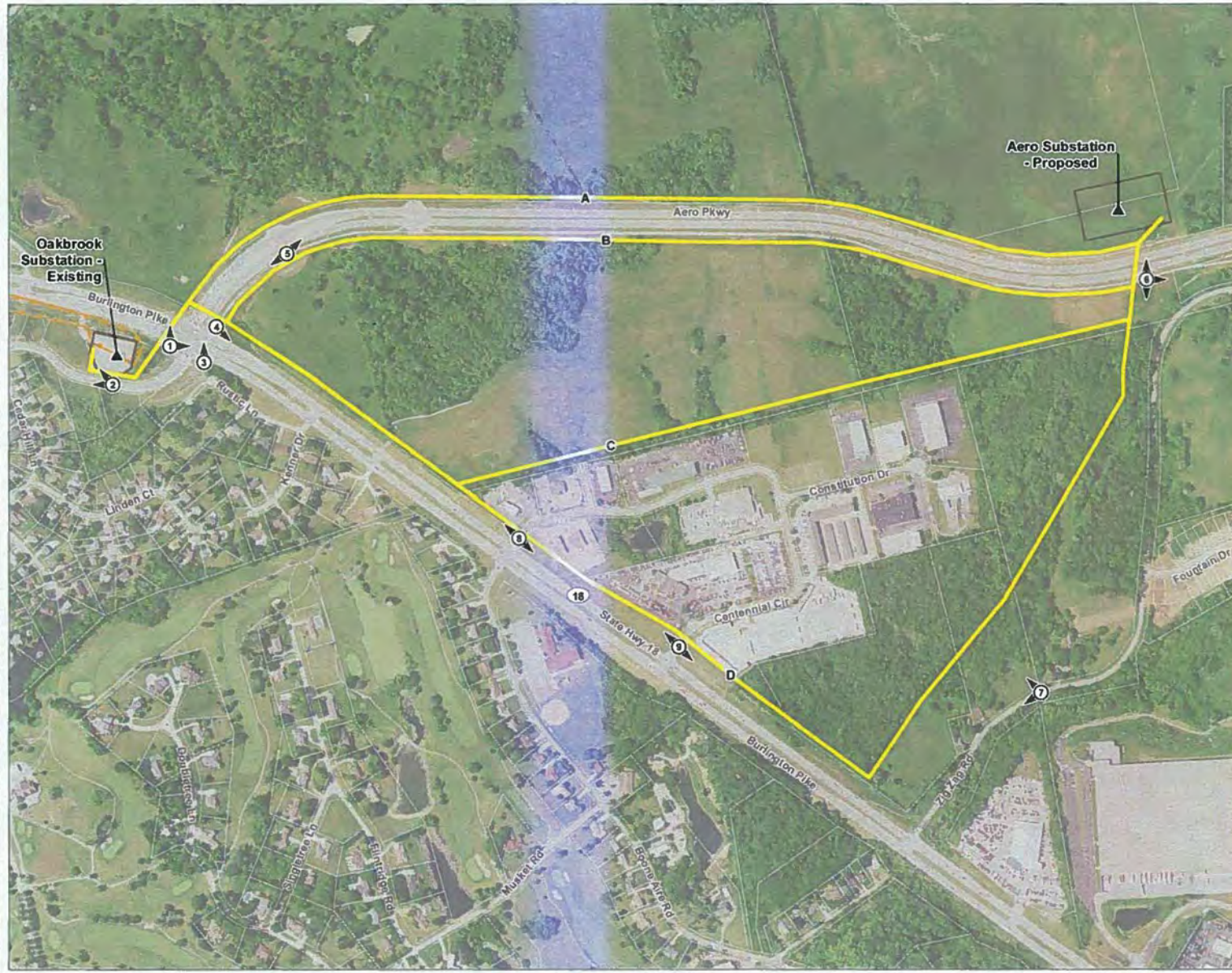


Figure No.  
 6

The  
**Photo Location Map**

Client/Project  
 Duke Energy  
 Oakbrook to Aero  
 138 kV Transmission Line Siting Study

Project Location  
 Boone County KY

193706563  
 Prepared by BE on 2019-05-28  
 Technical Review by RE on 2019-05-28  
 Independent Review by CR on 2019-05-31

0 250 500 Feet  
 1:8,000 (at original document size of 11x17)



**Legend**

- Study Area
- Existing/Proposed Duke Substation
- Photo Location
- Alternative Route
- Existing Duke Owned Transmission Line
- Substation Boundary
- Parcel Boundary



- Notes**
1. Coordinate System: NAD 1983 StatePlane Kentucky North FIPS 1401 feet
  2. Data Sources include: Stantec, Duke, NADS, Boone County
  3. Orthophotography: 2016 HAP



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**Duke Energy Kentucky  
Case No. 2019-00251  
Staff First Set Data Requests  
Date Received: September 27, 2019**

**STAFF-DR-01-012**

**REQUEST:**

Refer to the Boutwell Testimony, page 4, lines 10-11. Provide an estimate of when the engineering and design work for the proposed transmission project will be finalized.

**RESPONSE:**

Engineering design is scheduled to be complete by November 2019.

**PERSON RESPONSIBLE:** John K. Rogers

**Duke Energy Kentucky  
Case No. 2019-00251  
Staff First Set Data Requests  
Date Received: September 27, 2019**

**STAFF-DR-01-013**

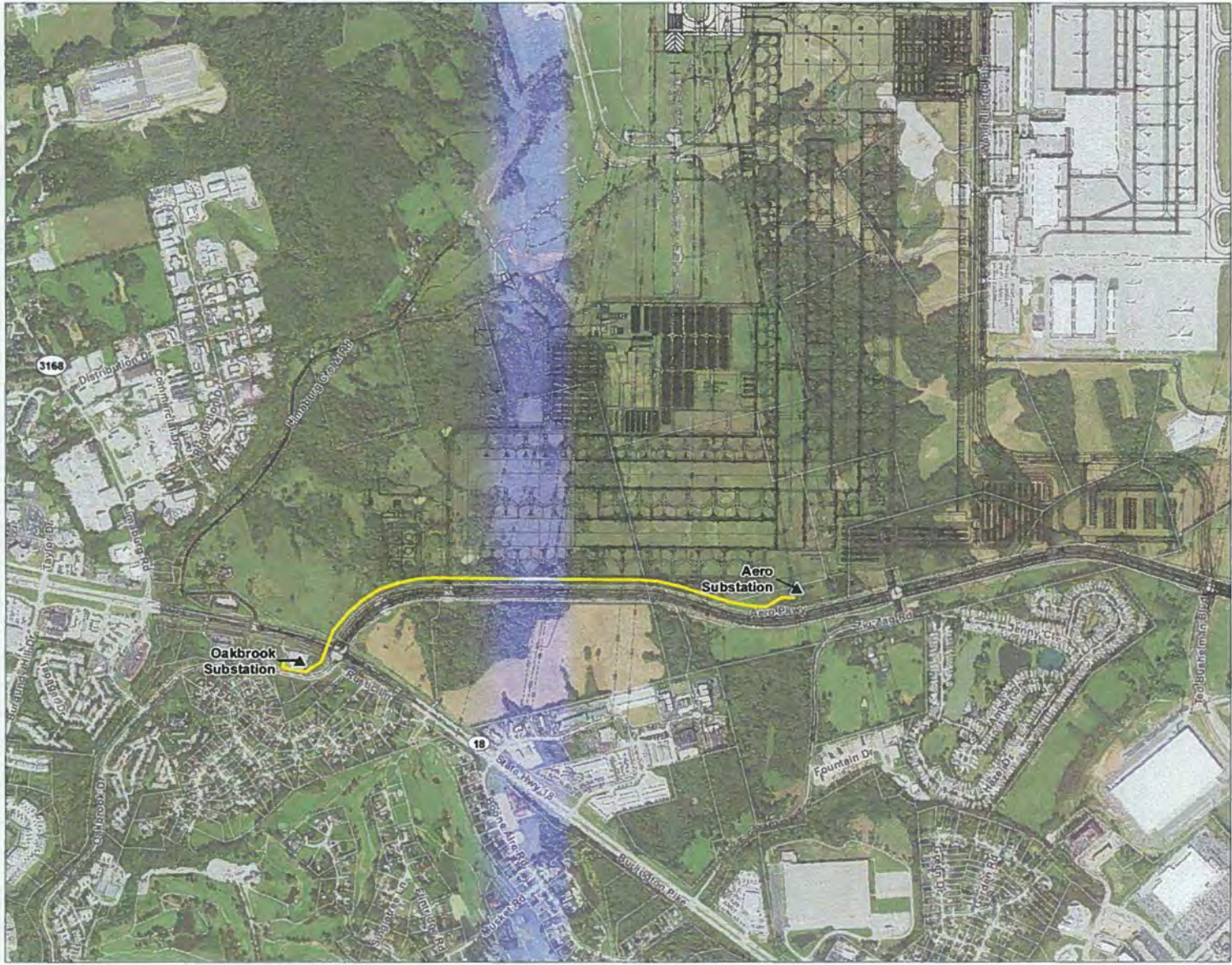
**REQUEST:**

Refer to the Boutwell Testimony, page 7, lines 1-13. Provide a map rendering which identifies the footprint of the Amazon Prime Air Hub, the Northern Kentucky International Airport, and the proposed transmission project.

**RESPONSE:**

A map providing the footprint provided to Duke Energy Kentucky from Amazon's engineering team, the Cincinnati/Northern Kentucky International Airport and the proposed transmission project is attached as STAFF-DR-01-013 Attachment.

**PERSON RESPONSIBLE:** John K. Hurd

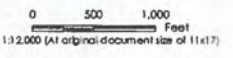


**Title**  
 Preferred Route and Proposed Amazon Air Hub

**Client/Project**  
 Duke Energy  
 Oakbrook to Aero  
 138 kV Transmission Line Siting Study

**Project Location**  
 Boone County, KY

193706563  
 Prepared by BF on 2018-10-03  
 Technical Review by JH on 2018-10-03  
 Independent Review by CB on 2018-10-03



- Legend**
- Existing/Proposed Duke Substation
  - Oakbrook to Aero Preferred Route
  - Amazon Air Hub Site Plan
  - Parcel Boundary



- Notes**
1. Coordinate System: NAD 1983 StatePlane Kentucky North FIPS 1401 Feet
  2. Data Sources include: Stantec; Duke; HADS; Boone Co.; Amazon
  3. Orthophotography: 2018 NAF



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**REQUEST:**

Refer to the Boutwell Testimony, page 8, lines 3-7. Provide the timeline for when the Amazon Prime Air Hub facility will reach the following loads: 20 MW, 40 MW, and 60 MW.

**RESPONSE:**

The information below is the latest timeline of load projections received from Amazon for their Amazon Prime Air Hub facilities.

- 10 MW anticipated by June 30, 2020.
- 30 MW anticipated by December 31, 2020.
- 60 MW anticipated when Amazon will have its additional facilities installed to support its growth in 2025.
- 90 MW is the final planned buildout of the Amazon Prime Air Hub which is anticipated for 2031.

**PERSON RESPONSIBLE:** Yanthi W. Boutwell

**Duke Energy Kentucky  
Case No. 2019-00251  
Staff First Set Data Requests  
Date Received: September 27, 2019**

**STAFF-DR-01-015**

**REQUEST:**

Refer to the Boutwell Testimony, page 10, lines 3-5. Provide an estimate as to when Duke Kentucky anticipates obtaining the final easements needed for the proposed transmission line.

**RESPONSE:**

The final easements are anticipated to be obtained for the proposed transmission line by January 31, 2020.

**PERSON RESPONSIBLE:** Yanthi W. Boutwell



**REQUEST:**

Refer to the Boutwell Testimony, page 10, lines 10-23.

- a. Provide an estimate as to when Duke Kentucky anticipates the plans with Amazon's site developer regarding access during construction and post-construction to be completed.
- b. Explain whether landowners other than those identified in Exhibits 9 and 10 to the application will be impacted if the proposed centerline is changed.
- c. Explain whether a change in the proposed centerline could occur along portions of the proposed route corridor that is located outside of Amazon Prime Air Hub's footprint.

**RESPONSE:**

- a. Duke Energy Kentucky has coordinated with Amazon so that access to the Duke Energy Kentucky equipment being installed has been accounted for during construction and post-construction in Amazon's design of their overall site plan and it is anticipated to be complete by the end of 2019.
- b. There are no foreseeable circumstances that would require a relocation far enough for it to impact any other property owners.

c. There are no foreseeable circumstances that would cause the proposed route corridor to relocate outside of the Amazon Prime Air Hub or Duke Energy Kentucky footprint.

**PERSON RESPONSIBLE:** John K. Rogers

**REQUEST:**

Refer to the Boutwell Testimony, pages 13, line 19 through page 14, line 2, stating that the driver for the proposed transmission project is "being able to meet a customer's schedule for when it will need electric service."

- a. Confirm that the customer referred to in the testimony is the Amazon Prime Air Hub.
- b. If confirmed, explain why Amazon is not being required to contribute to the cost of the transmission project when Amazon is the reason for the construction of the transmission project.

**RESPONSE:**

- a. The driver for the project is overall customer service not specific to Amazon. On page 14, lines 1 and 2 are in reference to Amazon and its schedule for when service is needed.
- b. Amazon is not the sole reason for the project. The need for this new transmission project has been in the Duke Energy Kentucky's plan for several years prior to Amazon's interest to build at CVG. This transmission improvement was based upon the tremendous growth that area has experienced over the past few years in retail, commercial, residential and industrial customers and will continue to see, based upon enquires from developers for future plans in the area. This project will improve the capacity and reliability

to all customer classes and will allow for additional development opportunities for the foreseeable future.

**PERSON RESPONSIBLE:** Yanthi W. Boutwell

**Duke Energy Kentucky  
Case No. 2019-00251  
Staff First Set Data Requests  
Date Received: September 27, 2019**

**STAFF-DR-01-018**

**REQUEST:**

Refer to the Direct Testimony of John K. Hurd (Hurd Testimony), page 4, lines 1-3. Explain how a 1.3 square mile study area rather than a larger study area was determined to be reasonable by Duke Kentucky.

**RESPONSE:**

For this project, Duke Energy Kentucky selected a Study Area that contained all potential linear features with opportunities to parallel between the existing Oakbrook Substation and the proposed Aero Substation. Linear features included the State Highway 18 corridor and the Aero Parkway corridor. The Study Area also allowed for multiple cross-country alternatives.

**PERSON RESPONSIBLE:** John K. Hurd

**REQUEST:**

Refer to the Hurd Testimony, page 6, lines 3-12.

a. Explain in detail why the Duke Energy standard methodology to evaluate transmission routes is better suited to evaluate a small study area as compared to the Kentucky Electric Power Institute/Georgia Transmission Corporation's Methodology (Kentucky EPRI Methodology).

b. Provide the similarities and differences between the Kentucky EPRI Methodology and Duke Energy's standard methodology for evaluating transmission routes.

**RESPONSE:**

a. The siting Methodology that Duke Energy Kentucky utilized on this project was able to quickly identify all feasible potential route alternatives. Since the project end points were only about 1 mile apart, Duke Energy Kentucky was able to identify all feasible route alternatives. The benefits of the Macro and Alternative Corridor steps in the Kentucky EPRI Methodology are realized on longer transmission lines where defining the study area and identifying alternative corridors are more time consuming and complicated.

b. Both methodologies utilize Geographic Information Systems and incorporate a broad array of criteria that represent the built environment, natural environment, and engineering considerations. Both rely on input from a multi-disciplinary group of subject matter experts. Both aim to identify existing linear features to follow as

well as identify cross country alternatives and both methodologies utilize a quantitative approach to compare route alternatives.

One of the differences between the two methods is the Kentucky EPRI Methodology utilizes a raster based GIS process to identify the study area and alternative corridors and for this project the Duke Energy Kentucky siting team identified the study area and route alternatives directly. The EPRI methodology uses a stakeholder group to identify weights while the Duke Energy Kentucky methodology uses many years of public feedback on similar projects combined with the siting team's subject matter expertise to establish the criteria and weighting.

**PERSON RESPONSIBLE:** John K. Hurd

**REQUEST:**

Refer to the Hurd Testimony, page 9, line 20 through page 10, line 9, concerning Duke Kentucky's public outreach efforts.

- a. Explain whether there was any positive or negative feedback from local officials or relevant regulatory agencies.
- b. Explain whether Duke Kentucky contacted any landowners other than those identified in Exhibits 9 and 10 to the application.
- c. Provide any positive or negative communications received through the project website, the toll-free phone number, or the email address associated with the proposed transmission line project.
- d. Explain whether Duke Kentucky has received any other communications related to the proposed transmission line project. If so, provide a summary of the nature of those communications.

**RESPONSE:**

- a. Duke Energy Kentucky talked with Boone County planners and officials in the summer and received a letter from Kevin Costello, the executive director of the planning commission, on July 19, 2019. The letter states they understand the need for the project but have concerns over the aesthetic impact of the project.



b. In addition to the landowners identified in Exhibits 9 and 10 of the application, Duke Energy Kentucky sent a letter to property owners within 500 feet of the proposed route on August 26, 2019.

c. After receiving the letter sent out on August 26, 2019 two property owners called the toll-free phone number with additional information requests. Neither property owner expressed positive or negative comments about the project.

d. There were no other communications received in addition to what was previously mentioned.

**PERSON RESPONSIBLE:** John K. Hurd

**Duke Energy Kentucky  
Case No. 2019-00251  
Staff First Set Data Requests  
Date Received: September 27, 2019**

**STAFF-DR-01-021**

**REQUEST:**

Refer to the Hurd Testimony, page 12, lines 20-22, noting that Route B ranked as the best route overall, but this route would affect owners on properties that are planned for future development. Identify the owners of the properties that would be impacted by Route B and explain what the future development of these properties would entail.

**RESPONSE:**

According to Boone County GIS the current property owners along Route B that would be affected are BRG Parkway Trails LLC, AERO AN USICIV LLC, and Boone County. Conceptual site plans for a mixed-use development for Al Neyer LLC were received on the properties owned by BRG Parkway Trails LLC and AERO AN USICIV LLC. This mixed-use development is currently being constructed.

**PERSON RESPONSIBLE:** John K. Hurd

**Duke Energy Kentucky  
Case No. 2019-00251  
Staff First Set Data Requests  
Date Received: September 27, 2019**

**STAFF-DR-01-022**

**REQUEST:**

Refer to the Hurd Testimony, page 13, line 6-8. Explain what is meant by the term "alignment shifts."

**RESPONSE:**

This term refers to modifications to the alignment of any of the alternative routes due to additional information received.

**PERSON RESPONSIBLE:** John K. Hurd

**REQUEST:**

Refer to the Hurd Testimony, page 13, line 15 through page 15, line 3. Provide a schedule identifying each environmental and engineering permit that will be needed along with an estimated timeline of when the application requesting each permit will be submitted and when a decision regarding each permit is expected to be obtained.

**RESPONSE:**

- 404/401 Permit Nationwide Permit (NWP) (USACE & KDOW):
  - Duke Energy Kentucky does not anticipate requiring a 401/404 permit since no impact to regulated waters for the Aero Substation, Oakbrook Substation or the transmission line are planned.
- USFWS Coordination to address rare, threatened, and endangered (RTE) species:
  - Stantec on Duke Energy Kentucky's behalf completed survey of the project area for potential impact to RTE species; a coordination letter dated August 7, 2019 from USFWS indicating the project is not anticipated to impact RTE species. No additional coordination is anticipated for this project.
- KPDES permit due to earth disturbance greater than 1 acre:
  - Duke Energy Kentucky is working with a consultant to develop a Stormwater Pollution Prevention Plan (SWPPP) to address erosion control measures during active construction and slope stabilization upon the

completion of construction activities and apply for a KPDES permit. A permit application is anticipated to be submitted by January 2020 and approved by February 2020.

- KHC (SHPO) consultation/review:
  - A data request has been completed. Additional coordination with KHC is not anticipated to be needed.
- Local Municipality & County Permits:
  - Duke Energy Kentucky will obtain the necessary permit applications to obtain approval for the proposed retaining wall at the Oakbrook Substation, curb cuts/driveways for the Oakbrook Substation, and temporary access drives along the transmission route. Duke Energy Kentucky anticipates submitting these permits by January 2020 and receive approvals by February 2020.
  - A clearing, grading, and land disturbance permit will be submitted to Sanitation District No. 1 (SD1) for approval by January 2020 and approval is anticipated by February 2020.
  - FAA (Federal Aviation Administration) permits will be filed by November 2019 and we anticipate obtaining them by February 2020.
  - The aerial crossing road permits will be filed by January 2020 and we anticipate receiving these permits by March 2020.

**PERSON RESPONSIBLE:** John K. Hurd

**REQUEST:**

Refer to the Direct Testimony of Edward R. Kirschner (Kirschner Testimony), page 4, line 20 through page 5, line 2.

- a. Provide the capacity of the current Oakbrook substation.
- b. Provide the capacity of the Oakbrook substation after its upgrade.
- c. Provide the capacity of the proposed Aero substation.

**RESPONSE:**

- a. Oakbrook Substation currently has one 69-13 kV transformer with a capacity of 22.4 MVA to supply the local 12.47 kV distribution system.
- b. A 138-69 kV transformer with a capacity of 150 MVA will be installed at Oakbrook Substation to supply the 69 kV system. The 69-13 kV transformer capacity will remain 22.4 MVA.
- c. Four 138-13 kV transformers, each with a capacity of 22.4 MVA for a total of 89.6 MVA will be installed in Aero Substation to supply the 12.47 kV distribution system.

**PERSON RESPONSIBLE:** Jeffrey O. Turner

**Duke Energy Kentucky  
Case No. 2019-00251  
Staff First Set Data Requests  
Date Received: September 27, 2019**

**STAFF-DR-01-025**

**REQUEST:**

Refer to the Kirschner Testimony, page 5, lines 4-13. Provide the projected future load that is expected to increase in the Boone County, Kentucky, area within the next five years.

**RESPONSE:**

Within the next five years the expected power loading is anticipated to increase 90 MVA.

**PERSON RESPONSIBLE:** Marc A. Bell