

VERIFICATION

STATE OF OHIO)
)
COUNTY OF HAMILTON) SS:

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 12th day of December, 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, 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 9TH day of DECEMBER,
2019.



ADELE M. FRISCH
Notary Public, State of Ohio
My Commission Expires 01-05-2024

Adele M. Frisch
NOTARY PUBLIC

My Commission Expires: 1/5/2024

VERIFICATION

STATE OF OHIO)
)
COUNTY OF HAMILTON) SS:

The undersigned, Yanthi W. Boutwell, General Manager 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 16th day of December, 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, 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 11 day of December, 2019.



NOTARY PUBLIC

My Commission Expires: July 8, 2022



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

KyPSC Case No. 2019-00361
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**Duke Energy Kentucky
Case No. 2019-00361
Staff First Set Data Requests
Date Received: December 6, 2019**

STAFF-DR-01-001

REQUEST:

Refer to the application, paragraph 18, regarding the proposed Woodspoint Substation. Explain why Duke Kentucky requested Duke Energy Ohio to construct, own, and operate the Woodspoint Substation.

RESPONSE:

The 138-kV bulk energy system that serves Duke Energy Kentucky is currently owned by Duke Energy Ohio. In all cases for 138 kV, Duke Energy Ohio owns the facilities required to establish a point of service to Duke Energy Kentucky from the Duke Energy Ohio facility that will provide the service. Woodspoint Substation will provide service to the proposed Duke Energy Kentucky 138-kV transmission line to Aero Substation from a 138-kV line owned and operated by Duke Energy Ohio, and as such, will be constructed, owned, and operated by Duke Energy Ohio. This connection at Woodspoint Substation will provide reliable service to Aero Substation and the overall local Duke Energy Ohio 138-kV system.

PERSON RESPONSIBLE: Jeff O. Turner

**Duke Energy Kentucky
Case No. 2019-00361
Staff First Set Data Requests
Date Received: December 6, 2019**

STAFF-DR-01-002

REQUEST:

Refer to the application, paragraph 13. Provide the anticipated load growth for each year in 2021, 2022, and 2023.

RESPONSE:

Based on known and anticipated growth in the area and customer requests:

- In 2021 is 35 MVA.
- In 2022 is 10 MVA.
- In 2023 is 10 MVA.

PERSON RESPONSIBLE: Marc A. Bell

**Duke Energy Kentucky
Case No. 2019-00361
Staff First Set Data Requests
Date Received: December 6, 2019**

STAFF-DR-01-003

REQUEST:

Refer to the application, paragraph 24. Provide a breakdown of the total estimated cost of the proposed transmission line project.

RESPONSE:

Refer to STAFF-DR-01-003 Attachment for the estimated cost breakdown for the transmission line project.

PERSON RESPONSIBLE: Yanthi W. Boutwell

Detail Project: M19022601 - 138 kV F23983 Woodspoint to Aero

Category	Estimated Cost	FERC Account / Plant	Description	Estimated Cost
Labor	\$ 2,793,470.88	355	Poles and Fixtures	\$ 3,244,049.11
Outside Services	\$ 214,465.21	356	Overhead Conductors and Devices	\$ 1,956,642.22
Material	\$ 341,703.84	354	Towers and Fixtures	\$ -
Fleet	\$ 1,020,007.93	350	Land and Land Rights	\$ -
Contingency	\$ 813,706.13	357	Underground Conduit	\$ -
Grants and Easements	\$ 17,337.33	358	Underground Conductors and Devices	\$ -
Total	\$ 5,200,691.33	Total		\$ 5,200,691.33

Detail Project: M19022602 - F23983 T Line RLE

Category	Estimated Cost	FERC Account / Plant	Description	Estimated Cost
Labor	\$ 471.16	355	Poles and Fixtures	\$ -
Outside Services	\$ 431.60	356	Overhead Conductors and Devices	\$ -
Material	\$ -	354	Towers and Fixtures	\$ -
Fleet	\$ 8,952.47	350	Land and Land Rights	\$ 2,107,387.44
Contingency	\$ 329,724.26	357	Underground Conduit	\$ -
Grants and Easements	\$ 1,767,807.96	358	Underground Conductors and Devices	\$ -
Total	\$ 2,107,387.44	Total		\$ 2,107,387.44

Detail Project: M19022604 - Florence to Woodspoint D-Line

Category	Estimated Cost	FERC Account / Plant	Description	Estimated Cost
Labor	\$ 84,986.39	355	Poles and Fixtures	\$ 153,035.91
Outside Services	\$ 4,249.32	356	Overhead Conductors and Devices	\$ -
Material	\$ 16,997.28	354	Towers and Fixtures	\$ -
Fleet	\$ 22,858.74	350	Land and Land Rights	\$ -
Contingency	\$ 23,944.17	357	Underground Conduit	\$ -
Grants and Easements	\$ -	358	Underground Conductors and Devices	\$ -
Total	\$ 153,035.91	Total		\$ 153,035.91

Detail Project: M19022605 - Donaldson to Woodspoint D-Line

Category	Estimated Cost	FERC Account / Plant	Description	Estimated Cost
Labor	\$ 84,986.39	355	Poles and Fixtures	\$ 153,035.91
Outside Services	\$ 4,249.32	356	Overhead Conductors and Devices	\$ -
Material	\$ 16,997.28	354	Towers and Fixtures	\$ -
Fleet	\$ 22,858.74	350	Land and Land Rights	\$ -
Contingency	\$ 23,944.17	357	Underground Conduit	\$ -
Grants and Easements	\$ -	358	Underground Conductors and Devices	\$ -
Total	\$ 153,035.91	Total		\$ 153,035.91

Detail Project: M19022606 - Woodspoint to Aero D-Line

Category	Estimated Cost	FERC Account / Plant	Description	Estimated Cost
Labor	\$ 424,931.97	355	Poles and Fixtures	\$ 826,053.12
Outside Services	\$ 16,997.28	356	Overhead Conductors and Devices	
Material	\$ 127,479.59	354	Towers and Fixtures	
Fleet	\$ 127,399.07	350	Land and Land Rights	
Contingency	\$ 129,245.22	357	Underground Conduit	
Grants and Easements	\$ -	358	Underground Conductors and Devices	
Total	\$ 826,053.12	Total		\$ 826,053.12

STAFF-DR-01-004

REQUEST:

Refer to the application, Exhibit 4, Aero to Woodspoint Transmission Line Project Line Route Evaluation Report for Detailed Project No. M18007706 by Stantec (Stantec Siting Study), page 14 of 96. Explain how the proposed route takes into account the concerns expressed by the property owners at the open house meeting.

RESPONSE:

The selection of the proposed route took into account the concerns expressed by property owners at the open house meeting by first incorporating the public rank of routing considerations into the weighting of the scoring and ranking criteria. In addition, Duke Energy Kentucky reviewed and considered comments on specific segments mentioned by property owners. The comments and concerns helped guide the selection of the proposed route to understand how to best minimize impacts to property owners.

Comments concerning Segments 23, 47, and 46 were addressed as the proposed route does not incorporate those segments. The comment concerning Segment 25 is unavoidable since crossing Aero Parkway is required of this line to feed Aero Substation. During design and construction, Duke Energy Kentucky will be taking this into consideration and will work to minimize impacts to Aero Parkway and the bike path.

Residential criteria were the highest weighted criteria in the scoring and ranking evaluation. Additionally, impacts to commercial properties were considered by selecting

Segments 4 and 8 over 5, 6, 9, and 10 as it reduces the number of signs, poles, and lights owned by businesses that would need to be relocated.

PERSON RESPONSIBLE: John K. Hurd

**Duke Energy Kentucky
Case No. 2019-00361
Staff First Set Data Requests
Date Received: December 6, 2019**

STAFF-DR-01-005

REQUEST:

Refer to the Direct Testimony of Yanthi W. Boutwell (Boutwell Testimony), pages 4-6. State whether the looped feed design is principally driven by the needs of the new Amazon Prime Air Hub facility and whether a looped feed configuration would be needed to serve future loads absent the Amazon Prime Air Hub facility.

RESPONSE:

Aero Substation is being installed to supply both existing and projected future loads in the vicinity of the new substation. Those loads are not limited to the Amazon Air Hub Facility but also will support known and anticipated general development in the area. Duke Energy Kentucky believes it to be prudent to provide looped feed to substations supplying significant customer loads. Absent the Amazon Air Hub Facility, Duke Energy Kentucky expects the area load to develop, so the loop feed would still be required for reliability.

PERSON RESPONSIBLE: Jeff O. Turner

**Duke Energy Kentucky
Case No. 2019-00361
Staff First Set Data Requests
Date Received: December 6, 2019**

STAFF-DR-01-006

REQUEST:

Refer to the Boutwell Testimony, pages 10-11, regarding the selection of a land acquisition vendor. State whether Duke Kentucky has selected a land acquisition vendor and, if so, identify the vendor and provide a timeline for the land acquisition process.

RESPONSE:

Duke Energy Kentucky held a bid event in November 2019. Burns & McDonnell Engineering Company, Inc. was selected as the successful bidder. Property acquisition is anticipated to start in early 2020.

PERSON RESPONSIBLE: Yanthi W. Boutwell

REQUEST:

Refer to the Direct Testimony of John K. Hurd, page 12, regarding stakeholder and landowner input.

- a. Provide specific examples of how the siting team worked with affected landowners to identify and alleviate any concerns raised by affected landowners.
- b. Identify any outstanding issues raised by affected landowners and explain how Duke Kentucky is working to resolve those issues.

RESPONSE:

- a. Duke Energy Kentucky and the property owner of parcels 25, 26, 27, 28, 29, and 30 on Exhibit 5 of the application have met and discussed the concerns of the property owner and Duke Energy Kentucky's design considerations and requirements. Duke Energy Kentucky explained to the property owner the details of what the proposed route would entail across their property including how the line would be constructed. The property owner discussed concerns about impacts to businesses during and after construction and Duke Energy Kentucky presented solutions to minimize those impacts and ways to communicate further as the Project progressed.
- b. The public comments raised by Michael Rouse are currently being evaluated by the Duke Energy Kentucky project team. Representatives from Duke Energy Kentucky

met with Mr. Rouse in person to understand his concerns and various route alternatives within his property are being evaluated. Some of these alternatives are outside of the Filing Corridor, but still within his property, and Duke Energy Kentucky will notify the Commission if the preferred route is adjusted as a result of conversations with the property owner. No additional easements would be required from other property owners by alternative route adjustments. Discussions are ongoing.

PERSON RESPONSIBLE: John K. Hurd

**Duke Energy Kentucky
Case No. 2019-00361
Staff First Set Data Requests
Date Received: December 6, 2019**

STAFF-DR-01-008

REQUEST:

Refer to the public comments submitted by Duane Dringenburg, Michael Rouse, and Ireland Properties, LLC, on November 5, 2019, November 21, 2019, and November 21, 2019, respectively.

- a. Provide a response addressing the concerns raised by each of the public comment letters.
- b. Also provide an explanation regarding the proposed route and how the proposed route satisfies or confirms to the siting guidelines provided in the Stantec Siting Study, particularly those guidelines that sought to minimize interference with the use of existing residences and economic activities in light of the comments expressed in the public comments received in the record of this case.
- c. State whether Duke Kentucky has confirmed that there are no deed restrictions on the parcels for its proposed preferred route related to placement or height of poles.

RESPONSE:

- a. The property owned by Duane Dringenburg is approximately 90 feet at its closest point from the proposed route centerline and therefore is within the 125 foot filing corridor but is not currently within the right-of-way for the proposed route. If no additional information is discovered during more detailed field surveys and engineering evaluations that would require an adjustment to route alignment, the

proposed Project is not anticipated to require an easement on Mr. Dringenburg's property.

The comments and concerns from Mr. Rouse have been considered and the alternative route he presented is currently being reviewed and alternatives crossing Mr. Rouse's property will be presented for discussion in a future meeting between Duke Energy Kentucky and Mr. Rouse. The route alternative that Mr. Rouse has presented in the public comment does have some challenges associated with it. The alternative route he has drawn, follows road right-of-way for Zig Zag Road and is currently being evaluated. Further discussions with Mr. Rouse will be conducted and feasible alternatives will be presented.

The property owner by Ireland Properties, LLC is approximately 50 feet from the proposed route centerline and therefore is within the 125-foot filing corridor but is not currently with the right-of-way for the proposed route. The proposed route is currently planned to be 50 feet east of the property line and therefore all of the right-of-way is currently proposed to be on the adjacent property owner. If no additional information is discovered during more detailed field surveys and engineering evaluations that would require an adjustment to route alignment, the proposed Project should not require an easement on property owned by Ireland Properties, LLC.

Duke Energy Kentucky will notify the Commission if the preferred route is adjusted as a result of conversations with the property owner.

- b. The siting guidelines presented in the Stantec Siting Study were followed and applied in the selection of the proposed route. While the public comments highlight concerns of impacts to the individual property owners, the selection of the preferred route must consider the impacts of the entire transmission line route and potential impacts to adjacent property owners and land uses. Often, individual property owner concerns do conflict with the cumulative impacts to a project and both considerations need to be taken into account when making the final route selection.
- c. Duke Energy Kentucky has confirmed that the Boone County parcel (Parcel #3 on Exhibit 5) contains a deed restriction created and enforceable by the Kenton County Airport Board which is related to the placement and height of our poles. We plan to work with the Kenton County Airport Board for its consent to our electric line facilities along Aero Parkway. We are not aware of any additional restrictions; however, Duke Energy Kentucky has not completed the deed evaluation. Once a land acquisition vendor is selected, identifying restrictions is included in the property title and research work.

PERSON RESPONSIBLE: John K. Hurd