

ORIGINAL



COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

**ELECTRONIC APPLICATION OF)
BIG RIVERS ELECTRIC CORPORATION)
FOR A CERTIFICATE OF PUBLIC)
CONVENIENCE AND NECESSITY TO)
CONSTRUCT A 161 KV TRANSMISSION LINE)
IN HENDERSON COUNTY, KENTUCKY)**

**Case No.
2022-00012**

**Responses to Commission Staff's
Second Request for Information
dated April 1, 2022**

FILED: April 18, 2022

ORIGINAL

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


In the Matter of:

ELECTRONIC APPLICATION OF)
BIG RIVERS ELECTRIC CORPORATION)
FOR A CERTIFICATE OF PUBLIC)
CONVENIENCE AND NECESSITY TO)
CONSTRUCT A 161 KV TRANSMISSION LINE)
IN HENDERSON COUNTY, KENTUCKY)

Case No.
2022-00012

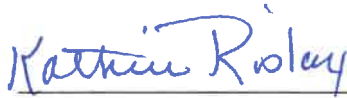
VERIFICATION

I, Christopher S. Bradley, verify, state, and affirm that the data request responses filed with this verification for which I am listed as witness are true and accurate to the best of my knowledge, information, and belief formed after a reasonable inquiry.


Christopher S. Bradley

COMMONWEALTH OF KENTUCKY)
COUNTY OF HENDERSON)

SUBSCRIBED AND SWORN TO before me by Christopher S. Bradley on this
the 18th day of April, 2022.


Notary Public, Ky. State at Large
My Commission Expires October 31, 2024
Notary ID: KYNP16841

BIG RIVERS ELECTRIC CORPORATION
ELECTRONIC APPLICATION OF
BIG RIVERS ELECTRIC CORPORATION
FOR A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY
TO CONSTRUCT A 161 KV TRANSMISSION LINE
IN HENDERSON COUNTY, KENTUCKY
CASE NO. 2022-00012

Response to Commission Staff's
Second Request for Information
dated April 1, 2022

April 18, 2022

1 **Item 1)** *Refer to BREC's response to Commission Staff's First Request for*
2 *Information, Item 1. Even though BREC is seeking private financing and*
3 *thus not required to conduct a National Environmental Policy Act (NEPA)*
4 *review, explain whether any sort of similar review has been undertaken for*
5 *this project. If so, explain what study BREC has undertaken and the results*
6 *of the study.*

7

8 **Response)** Online resources were utilized to ensure endangered species habitats
9 and historical listings are not being impeded upon or destroyed during the
10 installation of the transmission line. The vast majority of the line is traversing
11 cultivated farmland or a tree farm where environmental risks are at a minimum.
12 There are 10 endangered species listed in Henderson County, KY – two species of
13 bats and eight species of clams. With all crossing occurring overhead, the risk of loss
14 of habitat to the clams is extremely minimal as no disturbance to waterways is
15 occurring. Tree clearing will be kept to a minimum in order to ensure the least
16 disruptive impact as possible will be made to any bat habitats that may occur in the

BIG RIVERS ELECTRIC CORPORATION
ELECTRONIC APPLICATION OF
BIG RIVERS ELECTRIC CORPORATION
FOR A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY
TO CONSTRUCT A 161 KV TRANSMISSION LINE
IN HENDERSON COUNTY, KENTUCKY
CASE NO. 2022-00012

Response to Commission Staff's
Second Request for Information
dated April 1, 2022

April 18, 2022

1 area. Where tree clearing is required along the Right-of-Way, a wetland delimitation
2 will be performed. Where clearing within wetlands is required, the proper permits
3 will be filed to receive a Kentucky Water Quality Certification. In addition, all
4 required permits from the Army Corp. of Engineers will also be filed.

5

6 There are multiple historical listings within Henderson County with the vast
7 majority being for existing structures that the project will not impact. There are two
8 archeological sites listed in Henderson, KY with unlisted addresses. If any artifacts
9 are found during the construction of the proposed transmission line, all work will
10 immediately stop until a cultural survey can be performed. As no buildings will be
11 built and a permanent easement granted for the transmission line – it can be
12 assumed minimal impact of historical land will occur.

13

14 **Witness)** Christopher S. Bradley

15

BIG RIVERS ELECTRIC CORPORATION
ELECTRONIC APPLICATION OF
BIG RIVERS ELECTRIC CORPORATION
FOR A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY
TO CONSTRUCT A 161 KV TRANSMISSION LINE
IN HENDERSON COUNTY, KENTUCKY
CASE NO. 2022-00012

Response to Commission Staff's
Second Request for Information
dated April 1, 2022

April 18, 2022

1 **Item 2)** *Refer to BREC's response to Commission Staff's First Request for*
2 *Information, Item 9.*

3 *a. Confirm that BREC does not own the HMPL 161 kV line that will*
4 *parallel the proposed line for part of the proposed route.*

5 *b. Explain why the proposed substation and the Pratt paper mill could*
6 *not be served from the existing BREC 161 kV T Line.*

7 *c. Also refer to BREC's response to Commission Staff's First request,*
8 *Item 12. It appears that the proposed 161 kV line will tie in with the existing*
9 *161 kV T Line at the new proposed substation, perhaps looping two circuits.*
10 *Provide a map which shows the broader transmission configuration and*
11 *explain further how tying the two lines together enhances reliability and*
12 *accommodates expected load growth.*

13

14 **Response)**

15 a. The HMPL 161kV line that parallels a portion of the proposed line is not
16 owned by Big Rivers. It is owned by HMPL.

BIG RIVERS ELECTRIC CORPORATION
ELECTRONIC APPLICATION OF
BIG RIVERS ELECTRIC CORPORATION
FOR A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY
TO CONSTRUCT A 161 KV TRANSMISSION LINE
IN HENDERSON COUNTY, KENTUCKY
CASE NO. 2022-00012

Response to Commission Staff's
Second Request for Information
dated April 1, 2022

April 18, 2022

- 1 b. The Pratt Paper mill will be served from the existing Big Rivers 161 kV
2 transmission line. The new substation necessary to provide service to Pratt
3 Paper will be constructed adjacent to the Pratt Paper facility. The location
4 of this planned substation is approximately 7.1 miles from the nearest Big
5 Rivers owned 161 kV transmission line. The proposed 161 kV line addition
6 is needed to connect the Pratt Paper mill substation to the nearest Big
7 Rivers owned 161 kV facility. The proposed 161 kV South Henderson
8 switching station will allow the new 161 kV transmission line to connect
9 with the existing Big Rivers owned 161 kV transmission line.
- 10 c. Please see the attached Exhibit PSC 2-2(c), which expands on the
11 previously provided vicinity map to show the Big Rivers transmission
12 system between the Reid Substation and the Henderson County
13 Substation. The exhibit depicts the existing 161 kV transmission line
14 described in the response to subpart b of this response. This existing
15 transmission line connects the Big Rivers owned Reid Substation to the
16 Big Rivers owned Henderson County Substation. A HMPL owned 161 kV

BIG RIVERS ELECTRIC CORPORATION
ELECTRONIC APPLICATION OF
BIG RIVERS ELECTRIC CORPORATION
FOR A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY
TO CONSTRUCT A 161 KV TRANSMISSION LINE
IN HENDERSON COUNTY, KENTUCKY
CASE NO. 2022-00012

Response to Commission Staff's
Second Request for Information
dated April 1, 2022

April 18, 2022

1 circuit connects the existing HMPL Sub 4 to a midpoint on this same Big
2 Rivers owned transmission line with three line switches. This connection
3 of the Big Rivers and HMPL owned transmission lines create a three
4 terminal facility with circuit breakers located at each of the three
5 terminals (Reid Substation, Henderson County Substation and HMPL
6 Sub 4). A fault on any portion of these lines will result in an outage of the
7 entire Big Rivers 161 kV transmission line and the HMPL 161 kV line.
8 The replacement of the line switches with a switching station that
9 includes 161 kV circuit breakers creates a more robust, flexible, and
10 reliable configuration allowing for restoration of the 161 kV line after a
11 fault more quickly than the existing design. With the proposed switching
12 station configuration and the proposed transmission line, four individual
13 161 kV line sections with circuit breakers at each terminal of each line
14 will be created:

BIG RIVERS ELECTRIC CORPORATION
ELECTRONIC APPLICATION OF
BIG RIVERS ELECTRIC CORPORATION
FOR A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY
TO CONSTRUCT A 161 KV TRANSMISSION LINE
IN HENDERSON COUNTY, KENTUCKY
CASE NO. 2022-00012

Response to Commission Staff's
Second Request for Information
dated April 1, 2022

April 18, 2022

- 1 1. Reid Substation (BREC) to the proposed South Henderson Switching
2 Station (BREC) – *portion of existing Big Rivers owned transmission*
3 *line*
- 4 2. Henderson Co. Substation (BREC) to South Henderson Switching
5 Station (BREC) – *portion of existing Big Rivers owned transmission*
6 *line*
- 7 3. South Henderson Switching Station (BREC) to HMPL Sub 4 (HMPL) –
8 *existing HMPL owned transmission line*
- 9 4. South Henderson Switching Station (BREC) to Henderson Paper Mill
10 Substation (BREC) – *the proposed transmission line.*

11 Any of the four individual line sections can be outaged on a planned or
12 unplanned basis without impacting the other line sections. Additionally,
13 the proposed South Henderson Switching Station will be constructed to
14 allow the future addition of 161/69 kV transformer(s) to provide service to
15 Kenergy distribution substations in the vicinity as needed.

16

BIG RIVERS ELECTRIC CORPORATION
ELECTRONIC APPLICATION OF
BIG RIVERS ELECTRIC CORPORATION
FOR A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY
TO CONSTRUCT A 161 KV TRANSMISSION LINE
IN HENDERSON COUNTY, KENTUCKY
CASE NO. 2022-00012

Response to Commission Staff's
Second Request for Information
dated April 1, 2022

April 18, 2022

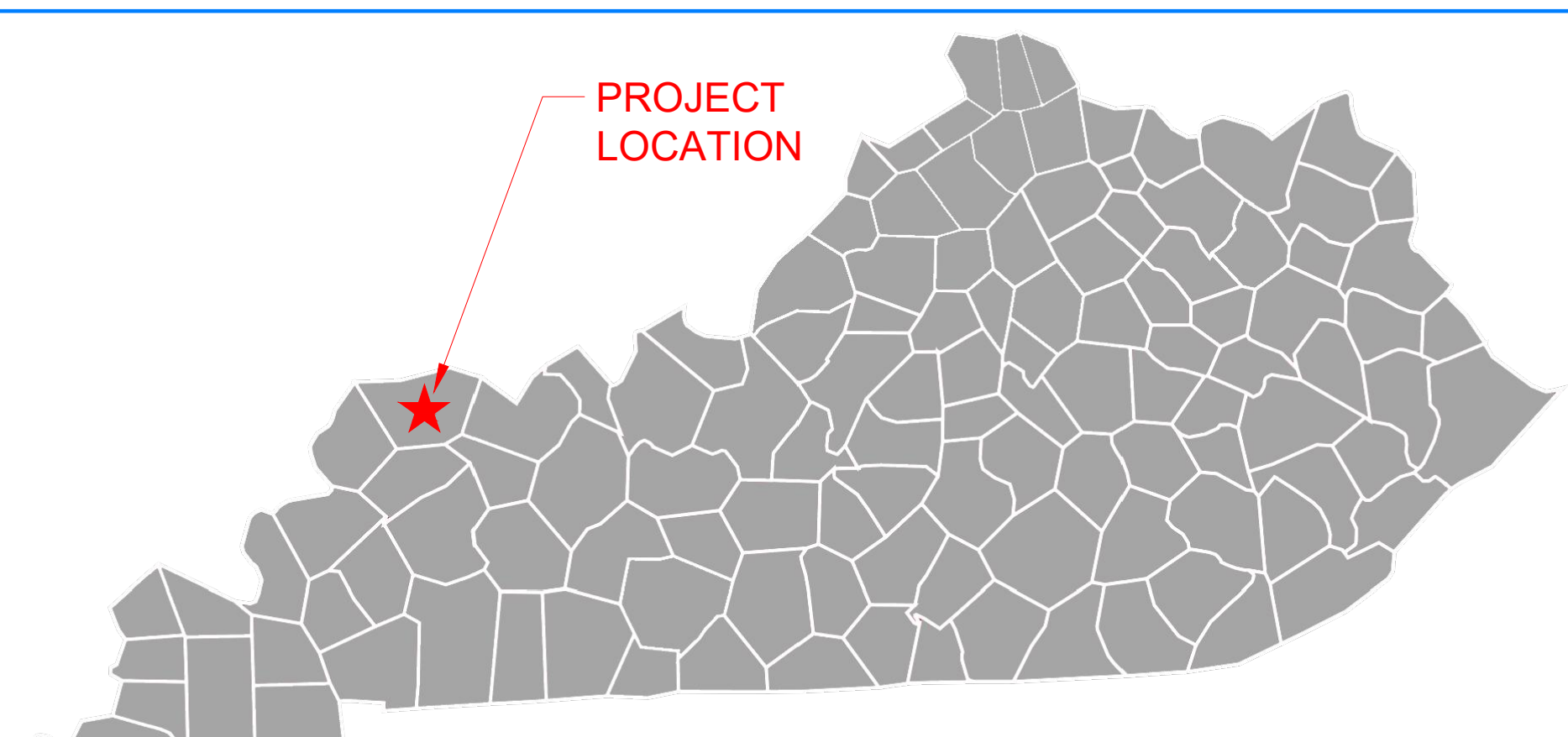
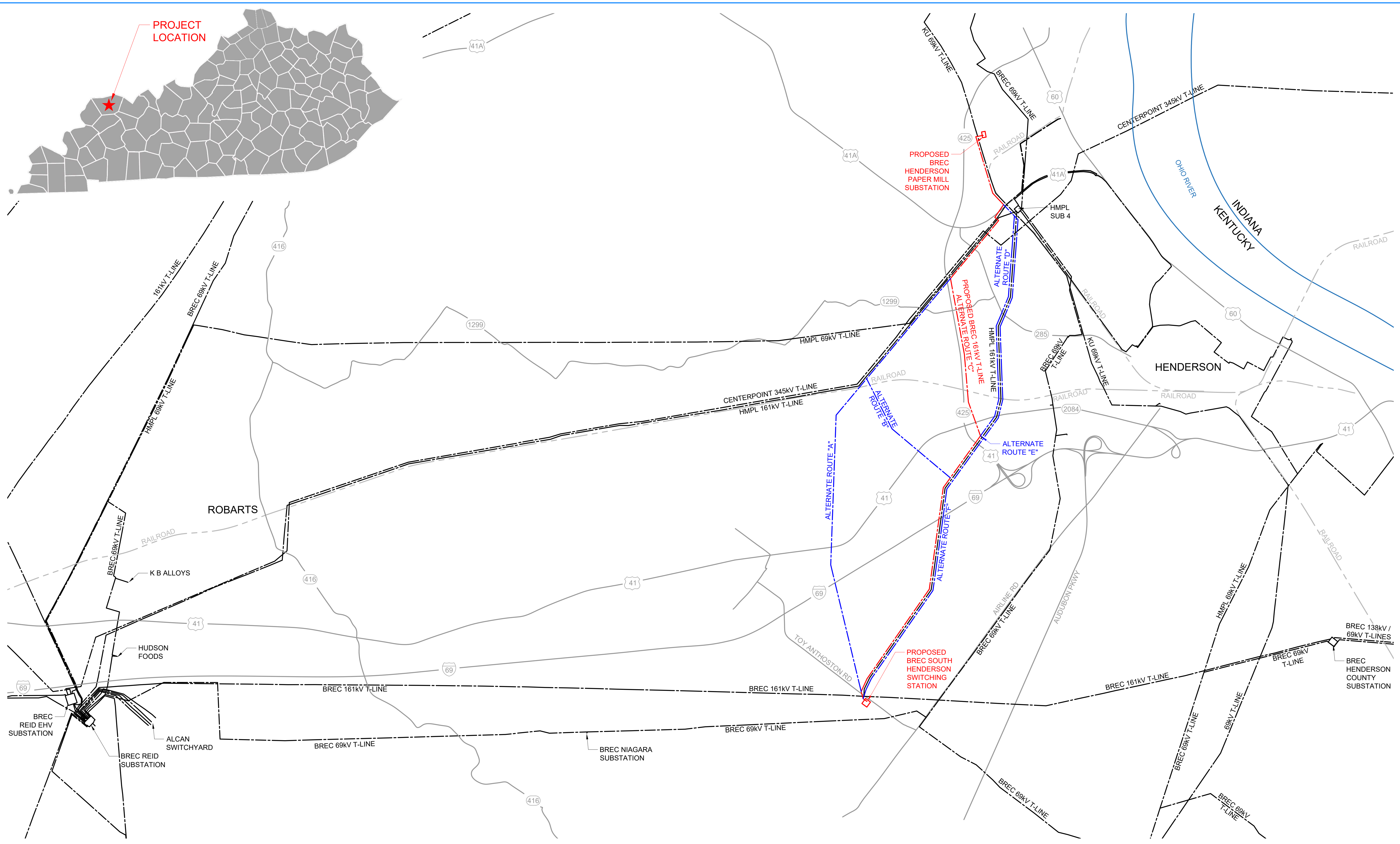
1

2

3 **Witness)** Christopher S. Bradley

4

PROJECT LOCATION



PROPOSED BREC HENDERSON PAPER MILL SUBSTATION

PROPOSED BREC SOUTH HENDERSON SWITCHING STATION

LEGEND

- ROAD
- RAILROAD
- EXISTING T-LINE
- PROPOSED T-LINE
- ALTERNATE T-LINE ROUTE

REV	DATE	DRFT	ENGR	REVISION DESCRIPTION
A	04/04/22		ABG	ISSUED FOR REFERENCE

**TRANSMISSION SYSTEM
HENDERSON AREA**

W.O.	DRAWING REVIEW	DATE	
SCALE: 1" = 2500'	ENGINEER: ABG (P&D ENGINEERS)	04-04-2022	
	DRAWN		SHEET 1 of 1

- PRELIMINARY
- FOR BID
- FOR CONSTRUCTION
- FOR RECORD
- "AS BUILT"
- REFERENCE

BIG RIVERS ELECTRIC CORPORATION
ELECTRONIC APPLICATION OF
BIG RIVERS ELECTRIC CORPORATION
FOR A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY
TO CONSTRUCT A 161 KV TRANSMISSION LINE
IN HENDERSON COUNTY, KENTUCKY
CASE NO. 2022-00012

Response to Commission Staff's
Second Request for Information
dated April 1, 2022

April 18, 2022

1 **Item 3)** *Refer to BREC's response to Commission Staff's First Request for*
2 *Information, Item 13. Confirm that BREC has permission from existing*
3 *affected landowners to move the proposed transmission line up to 500 feet on*
4 *either side of the center line, if necessary, so long as no new landowners are*
5 *affected.*

6

7 Response) Big Rivers has not received permission to move the proposed
8 transmission line up to 500' of the center line and Big Rivers does not anticipate a
9 need to move the line 500'. A move 500' from the centerline shown would only be
10 considered if conditions as described in Big Rivers' response to Item No. 13 of the
11 Commission Staff's First Request for Information are encountered or if the property
12 owner has a justified request for relocating the line segment.

13

14 **Witness)** Christopher S. Bradley

15

BIG RIVERS ELECTRIC CORPORATION
ELECTRONIC APPLICATION OF
BIG RIVERS ELECTRIC CORPORATION
FOR A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY
TO CONSTRUCT A 161 KV TRANSMISSION LINE
IN HENDERSON COUNTY, KENTUCKY
CASE NO. 2022-00012

Response to Commission Staff's
Second Request for Information
dated April 1, 2022

April 18, 2022

1 **Item 4)** *Refer to BREC's response to Commission Staff's First Request for*
2 *Information, Item 15. Confirm that BREC has the requisite permission from*
3 *affected landowners to move the proposed substation to a different location*
4 *within the property boundary.*

5

6 **Response)** Big Rivers has neither requested nor received permission from the
7 affected landowners to move the proposed substation to a different location. Big
8 Rivers has shared preliminary plans with the property owner regarding the planned
9 location of the switching station¹. There has been no objection to the plans submitted
10 to the property owner and Big Rivers does not anticipate a need to move the location
11 of the switching station.

12

13

14 **Witness)** Christopher S. Bradley

¹ The Commission Staff's First Request for Information, Item 15 was related to the proposed South Henderson Switching Station (*Project B*).