

ORIGINAL



COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

**Revised Response to Item No. 13 of
Commission Staff's First Request for Information**

dated February 28, 2022

FILED: April 1, 2022

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

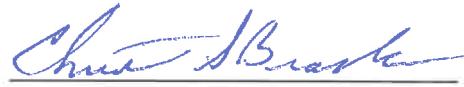
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VERIFICATION

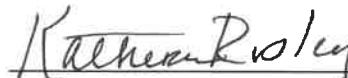
I, Christopher S. Bradley, verify, state, and affirm that the revised data request response filed with this verification for which I am listed as witness is true and accurate to the best of my knowledge, information, and belief formed after a reasonable inquiry.



Christopher S. Bradley

COMMONWEALTH OF KENTUCKY)
COUNTY OF HENDERSON)

SUBSCRIBED AND SWORN TO before me by Christopher S. Bradley on this
the 1st day of March, 2022.
April



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

BIG RIVERS ELECTRIC CORPORATION
ELECTRONIC APPLICATION OF
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FOR A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY
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1 Item 13) *Refer to the Application, page 9, lines 1-4.*

2 a. *Explain why BREC anticipates needing to move the location of the*
3 *proposed transmission line up to 500 feet on either side of the*
4 *centerline.*

5 b. *Explain all measures taken by BREC, in the planning process for*
6 *the proposed transmission line, to avoid the need to move the*
7 *proposed transmission line up to 500 feet on either side of the*
8 *centerline from location shown on the maps filed with the*
9 *application.*

10

11 **Response)**

12 a. Big Rivers does not anticipate a need to move the location of the proposed
13 transmission line unless unexpected conditions are discovered. However, Big
14 Rivers is requesting authority if such a scenario arises, to move the
15 transmission line up to 500 feet on either side of the centerline, provided that

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1 no new property owners are affected. Unexpected conditions may include, but
2 are not limited to the following: unsuitable subsurface conditions, new
3 development not present during the route study, and landowner requests for
4 changes to the line locations.

5 b. While unexpected conditions cannot be fully accounted for during the planning
6 phase, Big Rivers' preliminary engineering has included measures to minimize
7 the potential for changes to the proposed route. These measures include the
8 completion of a route study, an aerial LiDAR survey, a field review of the
9 proposed route, and meetings with impacted *utility* owners along the route *and*
10 *discussions with the owner of the property on which the proposed switching*
11 *station (Project B) would be constructed.* The measures have provided Big
12 Rivers with a high degree of confidence in the feasibility of building the
13 transmission line along the proposed route.

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1

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3 **Witness)** Christopher S. Bradley