

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

Electronic Application Of Kentucky Utilities)	
Company For A Certificate Of Public Convenience)	
And Necessity For The Construction Of)	Case No. 2022-00066
Transmission Facilities In Hardin County, Kentucky)	

Frank D. Brown and Martha V. Brown’s Response to Commission Staff’s First Request for Information to Frank and Martha Brown Dated May 16, 2022

Question 1: Refer to the Direct Testimony of Allen Summers, page 7. State whether the engineering review conducted by G-tower was presented to Kentucky Utilities (KU) at the May 3, 2022 meeting or at any time prior to being filed as evidence in this proceeding. If so, please provide the date the engineering report was shared with KU.

Response: The G-Tower, PLLC (“G-Tower”) engineering review and associated report (Exhibit 3 to the testimony of expert witness Gunes Demirbas, referred to herein as “Engineering Report”) was not presented to KU at the May 3, 2022 meeting because it was not yet completed at that time. The Browns received the Engineering Report shortly before the deadline to file intervenor testimony, and therefore KU first received a copy of the Engineering Report on May 12, 2022, when the Browns filed intervenor testimony.

However, the Browns presented to KU three of the four possible alternative routes that are contained in the Engineering Report (Alternatives B, C, and E) prior to the May 3, 2022 meeting by way of the Browns’ first set of data requests to KU dated April 14, 2022 (*see* Brown DR 1-11, 1-12, and 1-13 filed April 14, 2022). The alternative that the Browns ultimately propose in testimony (Alternative C) was one of the alternative routes included in the Browns’ first set of data requests to KU. KU representatives had in their possession at the May 3, 2022 meeting copies of these alternative route drawings included in the Browns’ data requests.

Moreover, Allen Summers prepared additional drawings on behalf of the Browns which were shared with KU and discussed in detail at the May 3, 2022 meeting with KU. These are attached hereto as BROWN_R_KPSC_1_1_Attachment1 and BROWN_R_KPSC_1_1_Attachment2. Both of the attachments were prepared by Allen Summers and depict informal renderings of KU and the Browns’ proposed and alternative routes for the Glendale West 345 kV Transmission Line. Mr. Summers drew over top of a boundary survey of the Brown Parcels that was prepared by Pence Surveys in 2000.

Attachment 1 shows an informal rendering of KU’s proposed route drawn by Mr. Summers. Attachment 2 shows an informal rendering of the Browns’ Alternative B and Alternative C routes, drawn by Mr. Summers. Although these alternatives were discussed in detail with KU at the May 3, 2022 meeting, KU made clear that it would not agree to any changes to the proposed

route of the line at that time. KU retained a copy of Attachment 1 and Attachment 2 after the May 3, 2022 meeting, and KU subsequently indicated on May 11, 2022 a willingness to consider the alternate route proposed by the Browns.

Witness: Allen Summers

