

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 Initial Data Requests to
Kentucky Utilities Company**

Pursuant to the Commission’s Order dated April 6, 2022, Frank D. Brown and Martha V.

Brown (together, “the Browns”) propound the following data requests to be answered by

Kentucky Utilities Company (“KU”):

DEFINITIONS

- “Document” means the original and all copies (regardless of origin and whether or not including additional writing thereon or attached thereto) of memoranda, reports, books, manuals, instructions, directives, records, forms, notes, letters, notices, confirmations, telegrams, pamphlets, notations of any sort concerning conversations, telephone calls, meetings or other communications, bulletins, transcripts, diaries, analyses, summaries, correspondence investigations, questionnaires, surveys, worksheets, and all drafts, preliminary versions, alterations, modifications, revisions, changes, amendments and written comments concerning the foregoing, in whatever form, stored or contained in or on whatever medium, including computerized memory or magnetic media.
- “Study” means any written, recorded, transcribed, taped, filmed, or graphic matter, however produced or reproduced, either formally or informally, a particular issue or situation, in whatever detail, whether or not the consideration of the issue or situation is in a preliminary stage, and whether or not the consideration was discontinued prior to completion.
- “Person” means any natural person, corporation, professional corporation, partnership, association, joint venture, proprietorship, firm, or the other business enterprise or legal entity.
- A request to identify a natural person means to state his or her full name and residence address, his or her present last known position and business affiliation at the time in question.

- A request to identify a document means to state the date or dates, author or originator, subject matter, all addressees and recipients, type of document (e.g., letter, memorandum, telegram, chart, etc.), number of code number thereof or other means of identifying it, and its present location and custodian. If any such document was, but is no longer in KU's possession or subject to its control, state what disposition was made of it.
- A request to identify a person other than a natural person means to state its full name, the address of its principal office, and the type of entity.
- "Identify" used in a fashion other than as described above means to provide in detail, including all assumptions, bases, facts considered, and rationale if not called for in another part of the data request, the requested information.
- "And" and "or" should be considered to be both conjunctive and disjunctive, unless specifically stated otherwise.
- "Each" and "any" should be considered to be both singular and plural, unless specifically stated otherwise.
- Words in the past tense should be considered to include the present, and words in the present tense include the past, unless specifically stated otherwise.
- "You" or "your" means the person whose filed testimony is the subject of these interrogatories and, to the extent relevant and necessary to provide full and complete answers to any request, "you" or "your" may be deemed to include any person with information relevant to any interrogatory who is or was employed by or otherwise associated with the witness or who assisted, in any way, in the preparation of the witness' testimony.
- "Brown Parcels" means the parcels owned by the Browns with Hardin County Parcel ID nos. 190-30-00-020 and 207-00-00-010.

INSTRUCTIONS

1. If any matter is evidenced by, referenced to, reflected by, represented by, or recorded in any document, please identify and produce for discovery and inspection each such document.
2. These interrogatories are continuing in nature, and, without regard to the date created or obtained, information which the responding party later becomes aware of, or has access to, and which is responsive to any request is to be made available to the Browns. Any studies, evaluations, analyses, documents, or other subject matter not yet completed that will be relied upon during the course of this case should be so identified and provided as soon as they are completed. The respondent is obliged to change, supplement and correct all answers to interrogatories to conform to available information, including such information as it first becomes available to the respondent after the answers hereto are served.
3. Unless otherwise expressly provided, each interrogatory should be construed independently and not with reference to any other interrogatory herein for purpose of limitation.
4. The answers provided should first restate the question asked and also identify the person(s) supplying the information.
5. Please answer each designated part of each information request separately. If you do not have complete information with respect to any interrogatory, so state and give as much information as you do have with respect to the matter inquired about, and identify each person whom you believe may have additional information with respect thereto.
6. In the case of multiple witnesses, each interrogatory should be considered to apply to each witness who will testify to the information requested. Where copies of testimony, transcripts or depositions are requested, each witness should respond individually to the information request.
7. The interrogatories are to be answered under oath by the witness(es) responsible for the answer.
8. Please furnish any non-disclosure or other required for disclosure of any information or response for which confidential treatment provided.

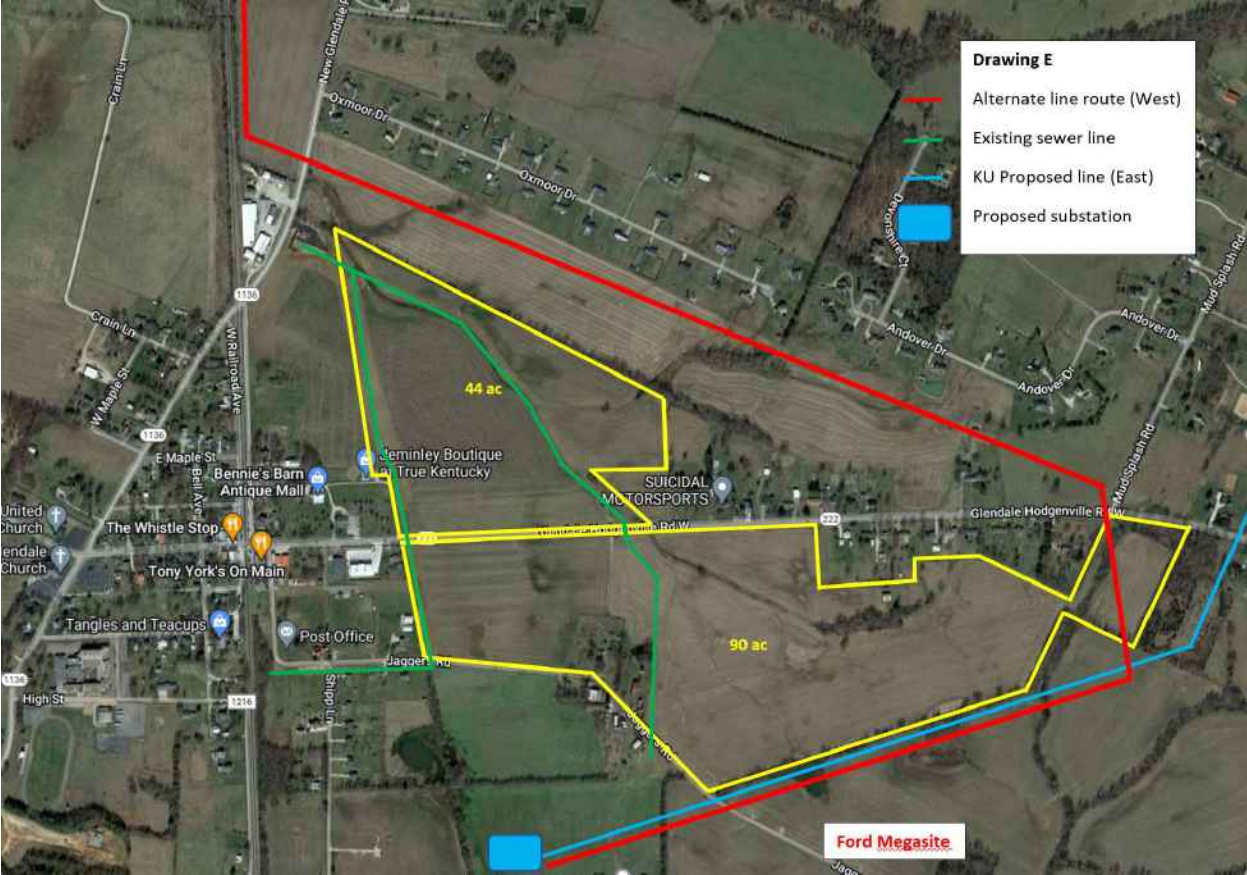
DATA REQUESTS

1. Please confirm where any and all structures will be located on the Brown Parcels and explain in detail each type of structure that will be located on the Brown Parcels.
2. Please explain whether KU has planned any additional future transmission projects (including, but not limited to, the rebuild or construction of any transmission line or substation) in or around the Glendale area. If yes, please describe any such future project in as much detail possible at this time.

3. Please explain whether the proposed Glendale West 345kV transmission line could be sited above, or parallel to, the two existing sewer easements across and through the Brown Parcels, of record at Book 1385, Page 1343, and Book 1385, Page 1346, in the Office of the Hardin County Clerk.
4. Please explain whether the requested 200-foot right-of-way is necessary, or if some narrower right-of-way could be utilized. If KU's position is that the requested 200-foot right-of-way is necessary, please explain in detail why it believes that to be the case, and why a narrower right-of-way would not suffice.
5. Please explain whether the requested 1,000 foot-wide corridor is necessary, or if some narrower corridor could be utilized. If KU believes that a 1,000 foot-wide corridor is necessary, please explain why, considering that the topography in and around Glendale, KY is relatively flat and clear of trees.
6. Please explain whether the proposed Glendale West 345kV line could run parallel to the proposed Glendale East 345kV line for its entirety. If no, please explain in detail why not.
7. Please explain whether any other locations for the proposed 345kV Glendale Industrial Substation were considered. If yes, please give the locations of the alternatives considered and why the alternatives were not selected.
8. Please explain whether KU considered an alternative path for the proposed Glendale West 345kV line where the line would come out of the proposed Glendale Industrial Substation on the western side, and go around the city of Glendale to the west. If yes, please explain why this alternative was not selected. If no, please explain why this alternative was not considered.
9. When selecting the proposed routes of the Glendale West 345kV line and Glendale East 345kV line, did KU consider routing either line along the path of any future roads that may be built in or around the Ford Megasite, if KU has knowledge of any such future roads?
10. Please explain whether KU considered any alternate routes for either proposed 345kV line other than those contained in the Siting Study. If yes, please detail any such routes and why they were not selected or contained in the Siting Study. If no, please explain why not.

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11. Please refer to the below map, which shows the Brown Parcels highlighted by yellow lines, the general location of an existing sewer line and easement in green, an approximation of the Glendale East 345kV line as proposed by KU in blue, and a potential alternate path for the Glendale West 345kV line in red. Please explain whether the path proposed in red is feasible to the best of KU's ability.



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12. Please refer to the below map and Question 11, above. Please explain whether the path proposed in red is feasible for placement of the proposed Glendale West 345kV line, to the best of KU's ability.



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13. Please refer to the below map and Questions 3 and 11, above. Please explain whether the path proposed in red is feasible for placement of the proposed Glendale West 345kV line, to the best of KU's ability.



Respectfully submitted,



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