

**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	)	

**DIRECT TESTIMONY OF MICHAEL P. BILLINGS, PE, PLS**  
**ENGINEERING DESIGN GROUP, PLLC**  
**ON BEHALF OF FRANK D. BROWN AND MARTHA V. BROWN**

1 **Please state your name, employer, position, and business address.**

2 My name is Michael P. Billings. I am Owner, Vice President, and General Manager of  
3 Engineering Design Group, Inc. ("EDG"), and my business address is 315 South Mulberry  
4 Street, P.O. Box 2484, Elizabethtown, Kentucky 42701.

5 **Please summarize your educational background and professional experience.**

6 I hold a Bachelor of Science with distinction in Civil Engineering from the University of  
7 Kentucky. I am a Professional Engineer and Professional Land Surveyor licensed in Kentucky. I  
8 have nearly thirty years of professional experience in engineering and surveying. Specifically, I  
9 have experience in project engineering, project surveying, cost control/budgeting, project  
10 management, maintenance management, purchasing, and strategic planning.

11 I began my engineering and surveying career at Hawkins Engineering in Elizabethtown,  
12 Kentucky where I was a junior engineer and land surveyor from 1993-1999. During my time at  
13 Hawkins Engineering I was responsible for the design of and preparation of design plans for  
14 numerous civil engineering and surveying projects, including the layout and design of state,  
15 county, and city roadways; layout and design of public and private utility systems with regards to  
16 drainage systems, sanitary sewer systems, and potable water systems; design of storm water  
17 drainage systems for both public and private projects; and development of land for residential,  
18 commercial, and industrial sites and subdivisions.

19 In 1999 I joined EDG, a small locally owned surveying and civil engineering company. Our  
20 business has been located in the City of Elizabethtown since 1999 and was formerly known as  
21 Clifford Engineering, LLP which began operation in the City of Elizabethtown in 1978. Over  
22 this time most of our work has focused on residential and commercial site development,  
23 boundary surveying, potable water, sanitary sewer, and storm drainage design and construction

1 staking. Since the conception of EDG, I have been the Professional Engineer and Licensed  
2 Surveyor responsible for all activities of the company. EDG has provided services of some  
3 fashion to nearly all of the local public municipalities and entities, as well as, nearly all of the  
4 local developers in and around Elizabethtown, Kentucky. EDG also has worked with numerous  
5 other engineering firms over the years on a number of various projects. A copy of my resume  
6 and a Company profile of EDG are attached to my testimony as **Exhibit 1**.

7 **On whose behalf are you testifying?**

8 I am testifying on behalf of intervenors Frank and Martha Brown (“the Browns”).

9 **What do you understand KU’s proposal in this case to be?**

10 It is my understanding that KU proposes to construct, among other things, the Glendale West  
11 345 kV Transmission Line (“Glendale West Line”). KU has represented that the right-of-way  
12 required for a 345 kV transmission line is 200 feet (100 feet on either side of the centerline). KU  
13 proposes to route the Glendale West Line through the middle of the two parcels of land owned  
14 by the Browns located in Hardin County with parcel numbers 190-30-00-020 and 207-00-00-010  
15 (“Brown Parcels”).<sup>1</sup>

16 **Are you familiar with the Brown Parcels?**

17 Yes. I have personally visited and observed the Brown Parcels on multiple occasions. I am  
18 familiar with the property boundaries and the topography of the Brown Parcels. The Brown  
19 Parcels currently are used for agricultural, or farming, purposes.

20 **Please explain your role in this matter and your opinions based on your knowledge and**  
21 **experience with respect to the Brown Property.**

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<sup>1</sup> The Brown Parcels are depicted on KU’s Attachment 1 to Response to PSC-1 Question No. 1, Pages 14 and 24 (filed April 8, 2022).

1 In the course of my work I have been involved in development of agricultural properties for  
2 other uses, including commercial use. I have spoken with Allen Summers regarding Frank and  
3 Martha Brown's intentions to develop the Brown Parcels for commercial use, consistent with the  
4 development of the Glendale Megasite.

5 From an engineering perspective as it relates to the Browns' intentions to develop the Brown  
6 Parcels for commercial use, KU's proposal to route the Glendale West Line through the middle  
7 of the Brown Parcels would have a significant negative effect on the Browns' ability to develop  
8 the property for commercial use. The proposed route of the Glendale West Line crosses through  
9 the middle of both Brown Parcels. Considering the substantial 200-foot right-of-way that KU  
10 claims is required for 345 kV transmission lines, the Brown Parcels would be substantially  
11 affected if the line is constructed as proposed by KU. The 200-foot right-of-way would not only  
12 render useless for commercial purposes a broad section across the middle of the Brown Parcels,  
13 but it would also have a substantial negative impact on the ability to use the remainder of the  
14 property for commercial or industrial purposes.

15 Utilities like KU impose conditions on the use of any property on which they are granted an  
16 easement. These conditions include restrictions on constructing any structures within the right-  
17 of-way easement. Sometimes utilities will also restrict the type and extent of grading that can be  
18 done within the right-of-way easement.

19 Therefore, if the Glendale West Line is constructed as proposed by KU, the line will divide the  
20 usable acreage into smaller sections, and the Brown Parcels will be much more limited with  
21 respect to the types and sizes of structures or operations that could be constructed or sited for  
22 commercial or industrial use. The Browns may lose significant commercial opportunities if they  
23 no longer have a large contiguous piece of property able to be developed. The Browns'

1 alternative route Alternative C (described more fully in the testimony of Allen Summers) would  
2 minimize the impact to the Brown Parcels and allow the Browns significantly more flexibility  
3 and options for developing the Brown Parcels for commercial or industrial use.

4 **Does this conclude your testimony?**

5 Yes.



**MICHAEL P. BILLINGS**  
**315 South Mulberry Street**  
**Elizabethtown, Kentucky 42701**  
**(270) 982-5102 (H) (270) 268-1425 (C)**  
**(270) 769-1436 (Office)**  
**Mbillings@engdesgrp.com**

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## **SUMMARY**

A positive, hard working individual, showing a resourcefulness for problem solving, with a wide range of engineering, surveying and project management experience. Strives to meet all challenges while considering new and innovative ways to achieve success for the needs of all involved parties. Extremely goal orientated and project driven. Is sensitive to the demands of engineering and surveying responsibilities. Has demonstrated the required administrative and technical skills to successfully complete projects on time and within budget. Is respectful to the needs of others and will work as necessary to successfully complete a project. Has illustrated talents and skills necessary for success in the following areas:

- ◆ Project Engineering
- ◆ Project Surveying
- ◆ Cost Control/Budgeting
- ◆ Project Management
- ◆ Maintenance Management
- ◆ Purchasing
- ◆ Staff Supervision
- ◆ Strategic Planning

## **ENGINEERING DESIGN GROUP, INC.**

### ***Owner/Vice-President/General Manager***

(May 1999 – Present)

Engineering Design Group, Inc. is a small locally owned surveying and civil engineering company. We take great pride and responsibility to provide high quality service, timely and cost effective designs, and in creating an outstanding working relationship with our clients. Our business has been located in the City of Elizabethtown since 1999 and was formerly known as Clifford Engineering, LLP which began operation in the City of Elizabethtown in 1978. Over this time most of our work has focused on residential and commercial site development, boundary surveying, potable water, sanitary sewer, and storm drainage design and construction staking. Since the conception of Engineering Design Group, Inc. I have been the Professional Engineer and Licensed Surveyor in responsible charge for all activities of the company. I share all business decisions associated with the company with my business partner, Ellis Raine, President, of Engineering Design Group, Inc. Over the years, we have worked very hard to establish a strong client base and we take great pride in the fact that many of our clients are repeat customers. We have provided services of some fashion to nearly all of the local developers, as well as, all of the public municipalities and entities. We have also worked with numerous architectural firms over the years on a number of projects.

### **ADDITIONAL EXPERIENCE**

**Hawkins Engineering**, Elizabethtown, KY  
**Junior Engineer and Land Surveyor**

(May 1993 –May 1999)

During this time, I was responsible for the design of and preparation of design plans for numerous civil engineering and surveying projects. This included direct contact with clients, city and government officials, field inspections and supervision of other employees. I was responsible for personnel decisions within the company and I contributed to the financial and growth decisions of the company. My design experience included:

- A) The layout and design of state, county, and city roadways. This included decisions into both the horizontal and vertical alignment of said roadways, as well as, the design and layout of the required drainage systems. The coordination of contract documents, bid documents, and construction documents. The supervision of construction and field inspections.
- B) The layout and design of public and private utility systems with regards to drainage systems, sanitary sewer systems, and potable water systems. This included the design of collector sewer and potable water systems for local cities. And the design of residential and commercial sewer and water systems that connect to existing public utility mains. As well as following the construction of said utility systems from start to finish including contract administration, bid preparation, and construction supervision and inspection.
- C) The design of storm water drainage systems for both public and private projects. This included the layout of said systems. Determining the size and material of drainage pipes. And the design of storm water retention/detention basins for various projects.
- D) The development of land for residential, commercial, and industrial sites and subdivisions. The development of sites for public and school related improvements. The coordination of said projects with clients, other disciplines, state, county, and city officials and contractors. The preparation of design plans, specifications, and contracts for said projects. And the supervision and inspection of construction.

**Dr. Lindell Ormsbee**, Lexington, KY  
**Research Assistant**

(January 1993 – May 1993)

Research assistant for combined sewer overflow project in and near Covington, KY

### **EDUCATION**

University of Kentucky, Lexington, KY  
Bachelor of Science with distinction in Civil Engineering

### **PROFESSIONAL REGISTRATIONS**

Professional Engineer, Kentucky  
Professional Land Surveyor, Kentucky

### **PROFESSIONAL MEMBERSHIPS**

National Society of Professionals Engineers  
Kentucky Society of Professional Engineers  
Kentucky Association of Professional Surveyors





**Engineering Design  
Group, Inc.**

315 South Mulberry Street  
P.O. Box 2484  
Elizabethtown, KY 42701  
Voice: (270) 769-1436  
Fax: (270) 765-9908

Michael P. Billings, PE, PLS  
Ellis W. Raine, President  
Celise Mercer  
Warren L. Clifford, PE, PLS

Engineering  
Land Surveying  
Site Design

Email  
MBILLINGS@ENGDESGRP.COM  
ERAINE@ENGDESGRP.COM  
CMERCER@ENGDESGRP.COM  
WCLIFFORD@ENGDESGRP.COM



**Project Organization:**

During the design and construction, Michael Billings, P.E., P.L.S., will be the principal-in-charge and the project manager for the project.

Throughout the conception and design of the project Mr. Billings and the staff at Engineering Design Group, Inc. will work closely with Client and all other design team members to insure an effective and economical design. During the design and construction phases each of the personnel and resources listed herein will be directed and utilized as necessary to ensure that the project is completed on schedule and within budget.

**Company Profile:**

Engineering Design Group, Inc. is a small locally owned surveying and civil engineering company. We take great pride and responsibility to provide high quality service, timely and cost-effective designs, and in creating an outstanding working relationship with our clients. Our business has been located in the City of Elizabethtown since 1999 and was formerly known as Clifford Engineering, LLP which began operation in the City of Elizabethtown in 1978. Over this time most of our work has focused on residential and commercial site development, boundary surveying, potable water, sanitary sewer, and storm drainage design and construction staking. Since the conception of Engineering Design Group, Inc. Michael Billings, P.E., P.L.S., has been the Professional Engineer and Licensed Surveyor in responsible charge for all activities of the company. Mr. Billings shares all business decisions associated with the company with his business partner, Ellis Raine, President, of Engineering Design Group, Inc. Over the years, we have worked very hard to establish a strong client base and we take great pride in the fact that many of our clients are repeat customers. We have provided services of some fashion to nearly all of the local public municipalities and entities, as well as, nearly all of the local developers. We have also worked with numerous other engineering firms over the years on a number of various projects in an effort to provide the best service available to our clients.



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Celise Mercer  
Warren L. Clifford, PE, PLS

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CMERCER@ENGDESGRP.COM  
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**Capabilities:**

Engineering Design Group, Inc. possesses the administrative and technical capabilities to handle this project in the allotted time frame, funding requirements and scope. A major portion of our business includes the development of sites of this nature. Our professional and technical staff is well versed at the design requirements necessary to successfully develop the proposed site. Conducting most of our business in the Hardin County and City of Elizabethtown area, has allowed us the advantage of being extremely knowledgeable with the local design and development requirements and regulations. Over the years we have established a strong working relationship with each of the utility companies for this site as well as the City of Elizabethtown and Kentucky Department of Transportation District #4. These relationships allow us to provide a level of service above and beyond most all other engineering firms. These relationships also allow us the opportunity to provide a cost effective and timely design to our clients.

**Proposed Project Team:**

Engineering Design Group, Inc.  
315 S. Mulberry Street  
P.O. Box 2484  
Elizabethtown, Ky. 42701  
Phone: (270) 769-1436  
Fax: (270) 765-9908  
Designated Contact: Michael P. Billings, Vice-President, P.E., P.L.S  
Number of years firm has been in business – 17 years

**Personnel:**

Michael P. Billings, P.E., P.L.S. – Vice President - 25 years experience  
Engineer  
BS in Civil Engineering  
Kentucky PE #21230  
Kentucky PLS #3472

Ellis W. Raine – President – 35 years experience  
Design & Administration

Warren L. Clifford, P.E., P.L.S. - 36 years experience  
Senior Engineer  
BS & MS in Civil Engineering  
Kentucky PE #10627  
Kentucky PLS #2124

Marina C. Mercer  
27 years drafting experience  
Drafting & Clerical

Vincent W. Carpenter  
14 years field experience  
Field Crew – Party Chief



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 Land Surveying  
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**Similar Projects:**

The following table represents similar projects that Engineering Design Group, Inc. has designed or is currently designing:

CLIENT	PROJECT	DESCRIPTION
Hardin County Government	Hardin County Government Building	75,000 sf., 5-story building Approx. 22 acre site improvements
Hardin Memorial Hospital	Hardin Memorial Hospital Ambulance Station	13,000 sf., 2-story building Approx. 10 acre site improvements
Rural King	Rural King Intersection 31W & Hwy. 220	120,000 s.f., 1-story building Approx. 12 acre site improvements
Altec Industries, Inc.	2012-2016 Site Improvements and Building Additions	Over 42,000 s.f. of building additions. Approx. 82 acre site improvements.
Hardin County Schools	Multiple School Sites	Building Additions/Renovations Site Improvements, including parking lot renovations.
Accumetric, LLC.	2015 Building Expansion	98,000 s.f., building addition Approx. 22 acre site improvements
TDA Properties, (Tim Aulbach)	Cool Springs Shopping Center	89,000 s.f., multiple buildings Approx. 11 acre site improvements.
City of Radcliff	Radcliff Fire Station No. 1	15,000 s.f., building Approx. 7 acre site improvements
City of Vine Grove	Vine Grove Fire Station / Storm Shelter Building	3000 s.f., 2-story building Approx. 2 acre site improvements
Nolin R.E.C.C.	Nolin R.E.C.C. Parking Lot Improvements	Parking Lot Improvements Phases 1 and 2 Approx. 40 acre site
Severns Valley Baptist Church	Severns Valley Baptist Church	91,000 s.f., building Approx. 65 acre site improvements
Mark Jones	Herb Jones Chevrolet Intersection 31W and Ring Road	30,000 s.f. building Approx. 4 acre site improvements
Carl Swope	Swope Toyota	30,000 s.f. building Approx. 4 acre site improvements
First Christian Church	First Christian Church 1807 North Miles Street	53,000 s.f. building Approx. 17 acre site improvements
Cecilia Bank	Cecilia Bank 3460 Leitchfield Road	11,000 s.f., 2-story building Approx. 9 acre site improvements

Engineering Design Group, Inc. has designed numerous other commercial, industrial, and residential sites and well as subdivisions in the City of Elizabethtown and throughout Hardin County.



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**Summary Statement:**

Engineering Design Group, Inc. has built our business in the Hardin County area and most all of us have grown up and lived in this area all of our lives and we have strong roots here. We feel that the quality of our services and design are exceptional and that we have the best interest of the Client and public in mind during all phases of design. We currently have a business license in the City Elizabethtown. We carry all required insurances on our employees as well as our business and we also carry the errors and omissions insurance.

Engineering Design Group, Inc. looks forward to continuing and building or relationship with our Client's and would like to thank you in advance for the opportunity to provide our services.

Respectfully Submitted,  
Engineering Design Group, Inc.

**Michael P. Billings**

Michael P. Billings, P.E., P.L.S.