

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

IN THE MATTER OF:

THE ELECTRONIC APPLICATION OF KENTUCKY )  
UTILITIES COMPNAY FOR A CERTIFICATE OF )  
PUBLIC CONVENIENCE AND NECESSITY FOR ) Case No. 2022-00066  
THE CONSTRUCITON OF TRANSMISSION )  
FACILITIES IN HARDIN COUNTY, KENTUCKY )

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**WADE FAMILY FARM MANAGEMENT, LLC'S**  
**INITIAL DATA REQUESTS TO KENTUCKY UTILITIES COMPANY**

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April 14, 2022

## I. DEFINITIONS AND INSTRUCTIONS

1. With respect to each discovery request, all information is to be divulged that is within the knowledge, possession or control of the parties to whom it is addressed, including their agents, employees, advisors, consultants, attorneys and/or investigators.

2. Please identify the witness(es) who will be prepared to answer questions concerning each request.

3. These requests shall be deemed continuing so as to require further and supplemental responses if the party receives or generates additional information within the scope of these requests between the time of the response and the time of any hearing conducted hereon.

4. All answers must be separately and fully stated in writing under oath.

5. Where a data request calls for an answer in more than one part, each part should be separated in the answer so that the answer is clearly understandable.

6. If any request appears confusing, please request clarification directly from counsel for Wade Family Farm Management, LLC, (“Wade Family Farm”).

7. For purpose of these discovery requests, the following terms shall have meanings set forth below:

- (a) As used herein, “document,” “documentation” and/or “record,” whether stated as the singular or the plural, means any course of binders, book, pamphlet, periodical, letter, correspondence, memoranda, including but not limited to, any memorandum or report of a meeting or telephone or other conversation, invoice, account, credit memo, debit memo, financial statement, general ledger, ledger, journal, work papers, account work papers, report, diary, telegram, record, contract, agreement, study, draft,

telex, handwritten or other note, sketch, picture, photograph, plan, chart, paper, graph, index, tape, data processing card, data processing disc, data cells or sheet, check acceptance draft, e-mail, studies, analyses, contracts, estimates, summaries, statistical statements, analytical records, reports and/or summaries of investigations, opinions or reports of consultants, opinions or reports of accountants, trade letters, comparisons, brochures, pamphlets, circulars, bulletins, notices, forecasts, electronic communication, printouts, all other data compilations from which information can be obtained (translated if necessary by defendants into usable form), any preliminary versions, drafts or revisions of any of the foregoing, and/or any other written, recorded, transcribed, punched, taped, filmed or graphic matter, however produced or reproduced and regardless of origin or location, in the possession, custody and/or control of the defendant and/or their agents, accountants, employees, representatives and/or attorneys. "Document" and "record" also mean all copies of documents by whatever means made, if the copy bears any other markings or notations not found on the original.

- (b) The terms "relating to," "referring to," "referred to," "pertaining to," "pertained to" and "relates to" means referring to, reporting, embodying, establishing, evidencing, comprising, connected with, commenting on, responding to, showing, describing, analyzing, reflecting, presenting and/or constituting and/or in any way involving.

- (c) The terms “and,” “or,” and “and/or” within the meaning of this document shall include each other and shall be both inclusive and disjunctive and shall be construed to require production of all documents, as above-described, in the broadest possible fashion and manner.
- (d) The terms “KU” and “Company” shall mean Kentucky Utilities Company, and shall include, but is not limited to, each and every agent, employee, servant, advisor, consultant, insurer and/or attorney of Kentucky Utilities Company. The term “you” shall be deemed to refer to KU and the Company.
- (e) The term “Commission” shall mean the Kentucky Public Service Commission.
- (f) To “identify” shall mean:
  - (1) With respect to a document, to state its date, its author, its type (for example, letter, memorandum, chart, photograph, sound reproduction, etc.), its subject matter, its present location, and the name of its present custodian. The document may be produced in lieu of supplying the foregoing information. For each document which contains information as privileged or otherwise excludable from discovery, there shall be included a statement as to the basis for such claim of privilege or other grounds for exclusion.
  - (2) With regard to a natural person, to state his or her full name, last known employer or business affiliation, title and last known home address.

- (3) With regard to a person other than a natural person, state the title of that person, any trade name, or corporate name or partnership name used by that person, and the principal business address of that person.
- (g) To “produce” or to “identify and produce,” shall mean that KU shall produce each document or other requested tangible thing. For each tangible thing which KU contends is privileged or otherwise excludable from discovery, there shall be included a statement as to the basis for such claim of privilege or other grounds for exclusion.
- (h) The terms “Party or Parties” shall mean any organization, person, corporation, entity, etc., which intervened, or whose request for intervention is still pending, in the above-captioned proceeding and shall further include the Commission Staff.
- (i) The term “Ford” shall mean both the “Ford Motor Company” and “SK Innovations” collectively, however, any specific reference to either company shall refer only to that company.
- (j) The term “Western 345 kV Transmission Line” refers to the transmission line for which KU seeks a CPCN and, unless specifically described otherwise, all alternative routes considered by KU.

## II. INITIAL DATA REQUESTS

### **Request No. 1.**

With regard to the Study Area set forth in the Team Spatial Report:

- (a) Please identify by name, organization and title, the person(s) who determined the boundaries of the Study Area;
- (b) Please describe in detail how the boundaries of the Study Area were determined.
- (c) Please identify any alternatives to the Study Area in the Team Spatial report that were considered by KU or Team Spatial.

### **Response.**

### **Request No. 2.**

Please describe why two 345 kV transmission lines are necessary to serve the proposed load at Glendale.

### **Response.**

### **Request No. 3.**

Please describe each and every reason that KU chose not to co-locate the proposed Western 345 kV Transmission Line in or adjacent to the existing Bonnierville-Hardin County 69 kV transmission line right-of-way.

### **Response.**

**Request No.4.**

Please refer to paragraph four of the Company’s application. Please provide any and all documents that support the Company’s “expected need for future development in the area including other customers supporting Ford.”

**Response.**

**Request No. 5.**

Please refer to paragraph ten of the Company’s application wherein the Company requests permission to deviate from the proposed centerline by up to 500 feet on either side of the centerline. Please confirm whether KU would agree to shift the centerline for that portion of the Western 345 kV Transmission Line Route A that is proposed to cross the Wade Family Farm’s property by 500 feet to the east.

**Response.**

**Request No. 6.**

Please refer to paragraph fourteen and exhibit twenty of the Company’s application. Confirm that KU did not give notice of the proposed Western 345 kV Transmission Line to any landowners whose property would be located on alternative Routes B, C, D, or E.

**Response.**

**Request No. 7.**

For each of the Western 345 kV Transmission Line alternative routes, please identify:

- (a) How many residential landowners would have be affected if the transmission line used that alternative route.
- (b) How many non-residential landowners would be affected if the transmission line used that alternative route.
- (c) What percentage of the route is located within a 100-year floodplain.
- (d) What percentage of the route is developed land.
- (e) What percentage of the route is forested land.
- (f) What percentage of the route is agricultural land.
- (g) The length (in linear feet).

**Response.**

**Request No. 8.**

Please refer to Exhibit two, page 54 of KU's application. Please identify who prepared the figures included in the row labeled "Total Project Costs."

**Response.**



**Request No. 9.**

For the Western 345 kV Transmission Line Route A proposal, please identify each nearby historic structure of which KU is aware and the distance of each such structure from the proposed centerline.

**Response.**

**Request No. 10.**

Please state whether KU is aware of any known Sandhill Crane roost sites or foraging habitat in the vicinity of the Western 345 kV Transmission Line Route A proposal.

**Response.**

**Request No. 11.**

Please state whether Team Spatial or Arcadis performed any field surveys or site reconnaissance of the Western 345 kV Transmission Line. If the answer is “yes,” please provide any documents prepared or created by Team Spatial or Arcadis arising from or relating to said field survey(s).

**Response.**

**Request No. 12.**

Please refer to exhibit two, page sixty of KU’s application. With regard to the Expert Judgment Model, please identify:

- (a) Who determined what weighting would be applied to the four specified criteria.
- (b) Whether the weighting approach was determined prior to, or after, the proposed and alternative routes for the Western 345 kV transmission line were developed.
- (c) Please also provide any documents that support your response to subparts (a) - (b) above.

**Response.**

**Request No. 13.**

Please refer to exhibit two, page sixty-one of KU's application. With regard to the Expert Judgment Model, please provide the composite scores for Western 345 kV Transmission Line Route B and Route C.

**Response.**

**Request No. 14.**

Please refer to the "Glendale West Proposed Route Map Index" included with the Company's application. For each of the three inset maps, please provide a new inset map that includes the planned locations of transmission towers or other structures, with the type and height of structures (single shaft, H-frame, lattice, etc.) identified.

**Response.**

**Request No. 15.**

Please refer to page six of the testimony of Beth McFarland. Please state when the TSR submitted to KU's ITO on March 11, 2022 is expected to be completed.

**Response.**

**Request No. 16.**

Please refer to Source Data Exhibit A, Streams and Wetlands. Please state how Arcadis identified wetlands as there are no source notes.

**Response.**

**Request No. 17.**

Please refer to Description of Proposed Facilities relating to proposed Glendale South Substation and Glendale Industrial Substation.

- (a) Please identify and describe the methodology for developing and determining the proposed locations for the substations.
- (b) If alternative locations were considered/evaluated, please provide all information on these locations and why they were not selected.
- (c) Did the locations of the proposed substations influence potential transmission line corridors?

**Response.**

**Request No. 18.**

Please refer to Built Criteria section on page eleven and Figure 11: Proximity to Historic Sites Suitability Grid of the Team Spatial report. The Model considers Proximity to “Eligible” Historic and Archaeological Sites.

- (a) Please clarify that the Model and Figure 11 includes both “listed” and “eligible” for listing on the NRHP buildings, districts, and sites.
- (b) Please provide a list of the historic resources and archaeological sites (for archaeological sites only requesting site numbers).

**Response.**

**Request No. 19.**

Please refer to Figure 11: Proximity to Historic Sites Suitability Grid. The Siting Study identifies “known” cultural resources (e.g., historic resources and archaeological sites listed on the National Register of Historic Places (NRHP)) using data from the Kentucky Heritage Council and Office of State Archaeology.

- (a) Please identify and prepare a figure of what areas of the Study Areas have had cultural resource surveys conducted and areas where no cultural resource surveys have occurred.
- (b) Please identify acres and percentages of each transmission line alternative that have been surveyed for cultural resources.
- (c) Please include a list of the cultural resource surveys conducted in the Study Area.

**Response.**

**Request No. 20.**

Please confirm that the Wade Family Farm is identified on Figure 4 of the Team Spatial report as having the center pivot irrigation system. If the answer is “yes,” how does this impact transmission line planning/siting?

**Response.**

**Request No. 21.**

Please confirm that Arcadis looked only at EPA data in identifying Areas of Concern. If the answer is “no,” please identify what Kentucky specific data was reviewed by Arcadis.

**Response.**

**Request No. 22.**

Please confirm that Arcadis did not identify underground storage tanks as part of its analysis.

**Response.**

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'D.S. Samford', is positioned above a horizontal line.

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David S. Samford

L. Allyson Honaker

GOSS SAMFORD, PLLC

2365 Harrodsburg Road, Suite B-325

Lexington, KY 40504

(859) 368-7740

david@gosssamfordlaw.com

allyson@gosssamfordlaw.com

*Counsel for Wade Family Farm Management, LLC*

**CERTIFICATE OF SERVICE**

This will certify that the foregoing document was filed via the Commission's electronic filing system this 14<sup>th</sup> day of April 2022; there are currently no parties that the Commission has excused from participation by electronic means in this proceeding and pursuant to prior Commission orders, no paper copies of this filing will be made. .

A handwritten signature in blue ink, appearing to be 'D. A. [unclear]', written over a horizontal line.

*Counsel for Wade Family Farm Management, LLC* .