

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.
THE CONSTRUCITON OF TRANSMISSION) 2022-00066
FACILITIES IN HARDIN COUNTY, KENTUCKY)**

**RESPONSES TO COMMISSION STAFF'S INITIAL REQUEST FOR
INFORMATION TO WADE FAMILY FARM MANAGEMENT, LLC,
DATED MAY 16, 2022**

Filed: May 23, 2022

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF:

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

VERIFICATION OF MARTY MARCHATERRE

COMMONWEALTH OF KENTUCKY)
)
 COUNTY OF GARRARD)

Marty Marchaterre of Copperhead Environmental Consulting, on behalf of Wade Family Farm, LLC, being duly sworn, states that he has supervised the preparation of certain responses to Commission Staff's First Request for Information in the above-referenced case and that the matters and things set forth therein are true and accurate to the best of his knowledge, information and belief, formed after reasonable inquiry.


 Marty Marchaterre

The foregoing Verification was signed, acknowledged and sworn to before me this 18 day of May, 2022, by Marty Marchaterre.




 Commission expiration: 10-06-25

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF:

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

VERIFICATION OF THOMAS C. WADE

COMMONWEALTH OF KENTUCKY)
)
COUNTY OF HARDIN)

Thomas C. Wade, on behalf of Wade Family Farm, LLC, being duly sworn, states that he has supervised the preparation of certain responses to Commission Staff's First Request for Information in the above-referenced case and that the matters and things set forth therein are true and accurate to the best of his knowledge, information and belief, formed after reasonable inquiry.

Thomas C Wade
Thomas C. Wade

The foregoing Verification was signed, acknowledged and sworn to before me this 19th day of May, 2022, by Thomas C. Wade.

Deanna Cambron
Commission expiration: 7-9-2022



WADE FAMILY FARM, LLC
PSC CASE NO. 2022-00066
FIRST REQUEST FOR INFORMATION RESPONSE

COMMISSION STAFF'S FIRST DATA REQUEST—05/16/22

REQUEST 1

RESPONSIBLE PERSON: Marty Marchaterre

COMPANY: Wade Family Farm Management, LLC

Request 1. Refer to the Direct Testimony of Marty Marchaterre, page 11, lines 14-20 and page 13, lines 1 and 15-16.

- a. Explain whether it is Wade Farm's position that only a single line be built in order to service the Megasite and that the eastern transmission line is the line that should be built.
- b. Explain whether Wade Farm is aware of standard electric utilities practice of furnishing power to large industrial sites and whether these sites are usually served by more than one transmission line for reliability purposes.

Response 1.

- a. Based upon the information currently included in the case record, it is the position of Wade Family Farm Management, LLC ("Wade Family Farm") that the need for two 345 kV transmission lines has not been demonstrated. As between the proposed western transmission line and the proposed eastern transmission line, the eastern transmission line is: (1) considerably shorter (3.7 miles v. 4.9 miles); (2) significantly less costly (\$14.8 million

v. \$19.5 million); (3) impacts no residential (0 v. 7) or industrial buildings (0 v. 4) within 300' of the proposed centerline; (4) impacts fewer agricultural buildings (1 v. 4) within 300' of the proposed center line; (5) requires much less clearing of forested acreage (12.4 acres v. 20.9 acres); (6) involves approximately half as many water crossings (9 v. 16); and (7) includes less than half as many right-of-way acres within stream buffers (1.8 acres v. 4.8 acres). Overwhelmingly, the proposed eastern transmission line is superior to the proposed western transmission line.

- b. There is no information in the record concerning what is “standard electric utilities practice of furnishing power to large industrial sites.” However, the record demonstrates that KU’s 345 kV electric transmission system is very reliable historically speaking and that it does in fact serve at least one other large industrial customer with a single radial 345 kV transmission line.¹ Thus, the need for constructing a redundant high-voltage transmission line at a cost of nearly \$20 million dollars to ratepayers is unclear. Wade Family Farm has not undertaken any independent analysis of what standard utility practices may entail.

¹ See Kentucky Utilities Company Response to Wade Family Farm’s Supplemental Request for Information, Requests 3 and 4 (May 6, 2022).

WADE FAMILY FARM, LLC
PSC CASE NO. 2022-00066
FIRST REQUEST FOR INFORMATION RESPONSE

COMMISSION STAFF’S FIRST DATA REQUEST—05/16/22

REQUEST 2

RESPONSIBLE PERSON: Marty Marchaterre

COMPANY: Wade Family Farm, LLC

Request 2. Refer to the Direct Testimony of Marty Marchaterre, page 12, lines 1-6 and the Application, Exhibit 2, page 46. Exhibit 2 on page 46 is a map showing the Western Alternate Routes. On the map, the West A Route is longer and, hence more costly, than the West D Route.

- a. Explain whether Wade Farm is proposing that rather than take a route that primarily stays away from residential areas, Kentucky Utilities should take the West D Route through a residential neighborhood, where no transmission line currently exists.
- b. Explain whether Wade Farm has contacted the residential neighborhood homeowners concerning its desire to not have the transmission line encroach on its farm, but to have it run through their neighborhood.

Response 2.

- a. According to the Team Spatial Report prepared on behalf of Kentucky Utilities Company (“KU”), the only Built Environment metric where Route D outperforms

Route A in the proposed Western Alternate Routes is where there are fourteen (14) residences within three hundred feet of the centerline for Route D whereas there are seven (7) residents within three hundred feet of the centerline for Route A. Wade Family Farms is unaware of any authority that suggests avoidance of residential structures is the primary purpose of electric transmission siting. The Kentucky version of the EPRI-Georgia Transmission Siting is intended to *objectively* look at all relevant factors in making transmission siting decisions. In this particular case, Route D overwhelmingly scored as the preferred route in every category (Built, Natural, Engineering and Simple Average). Route A only became KU's preferred route after Route B and Route C were excluded and Route D was eliminated in the Expert Judgment phase. The Expert Judgment phase appears to be when KU adjusted the weighting assigned to the various components of its analysis so that the outcome would be heavily skewed towards avoiding residential structures. Thus, only by making subjective judgments as to the weight to be assigned to siting criteria was KU able to come to the conclusion that Route D was preferrable to Route A for the Western Transmission Line despite Route D actually scoring two times better than Route A in the objective phase of the Siting Study (Route A scored 0.54 on a Simple Average while Route D scored 0.27 on a Simple Average).

On information and belief, KU has numerous high-voltage transmission lines that are in close proximity to, or even in the middle of, residential neighborhoods across Kentucky. This is not uncommon. In this case, KU's stated metric was whether a residential structure would be within three hundred feet of the proposed centerline – not whether the residential property was actually within the necessary right-of-way. From that standard, the number of truly impacted residential structures is likely to be less.

Moreover, if avoiding residential neighborhoods is a criteria that is assigned greater weight than other considerations, Route B, and also Route C perhaps, should not have been excluded from the Expert Judgment phase.

- b. Wade Family Farms has not given notice to anyone concerning any of the transmission line routes considered by KU. Wade Family Farms understands that notice requirements imposed by Kentucky law fall to the applicant and not an intervenor.

**WADE FAMILY FARM, LLC
PSC CASE NO. 2022-00066
FIRST REQUEST FOR INFORMATION RESPONSE**

COMMISSION STAFF'S FIRST DATA REQUEST—05/16/22

REQUEST 3

RESPONSIBLE PERSON: Thomas Wade

COMPANY: Wade Family Farm, LLC

Request 3. Provide a map of the current Gaither Station line and proposed line route that Wade Farm mentions in its Direct Testimony of Thomas Wade, pages 8-9.

Response 3. Refer to Direct Testimony of Thomas Wade, Exhibit TCW-2. The current 69 kV Gaither Station Line is denoted in the pink shaded area. KU's proposed 345 kV transmission line route is shown as a blue line. Wade Family Farm has not proposed a line route that is different from KU has proposed, but reserves the right to do so.

**WADE FAMILY FARM, LLC
PSC CASE NO. 2022-00066
FIRST REQUEST FOR INFORMATION RESPONSE**

COMMISSION STAFF'S FIRST DATA REQUEST—05/16/22

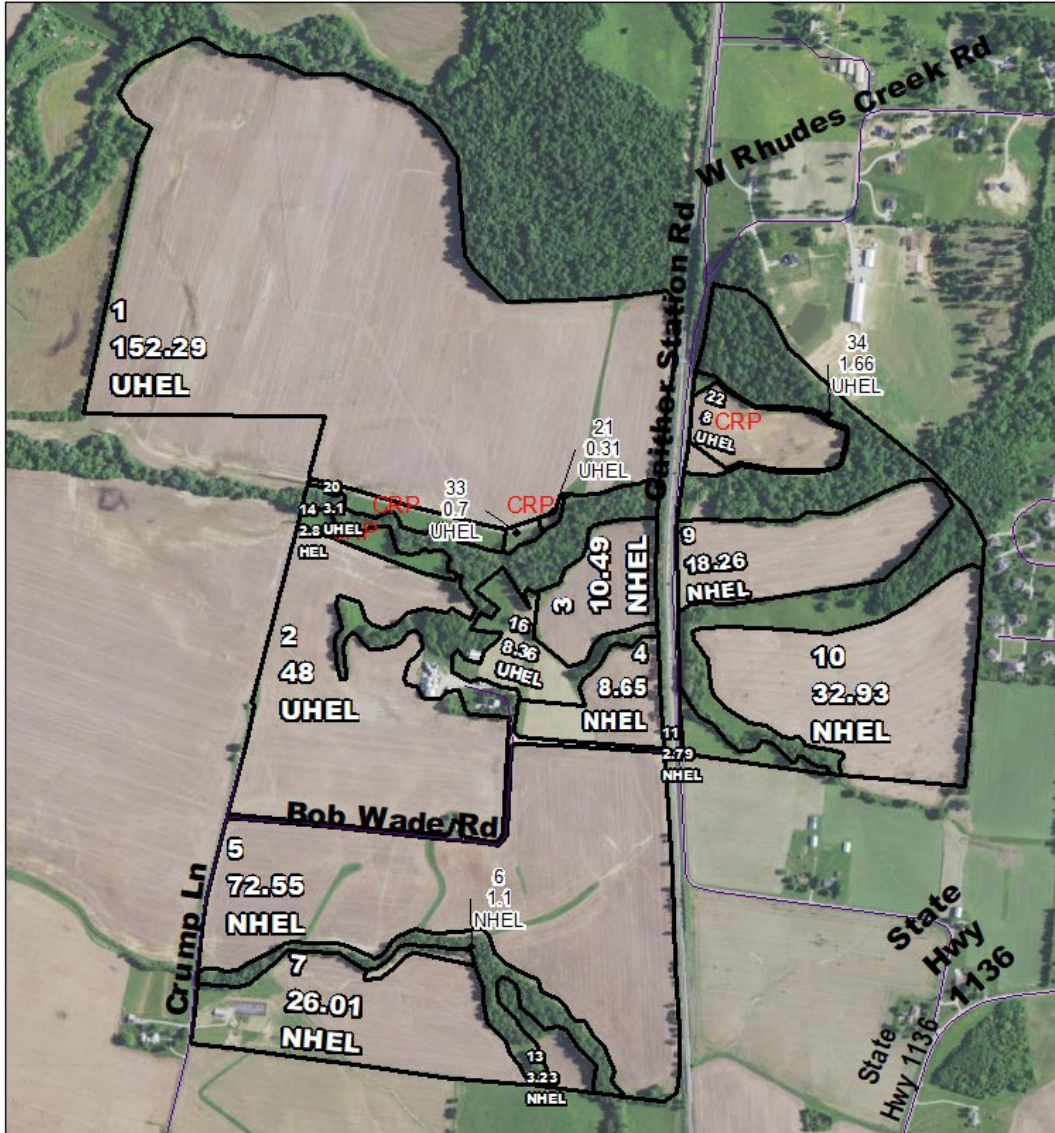
REQUEST 4

RESPONSIBLE PERSON: Thomas Wade

COMPANY: Wade Family Farm, LLC

Request 4. List and describe all conservation easements to which the Wade Farm property is subject.

Response 4. Refer to the attached map from the U.S. Department of Agriculture's Farm Services Administration ("FSA"). Areas denoted with the red "CRP" notation are enrolled in the Conservation Reserve Program.



United States Department of Agriculture
Farm Service Agency

Farm: 5289
Tract: 2390

Hardin County, KY
1:10,062

April 29, 2022

CROP YEAR _____



Legend

- CRP as of 09/30
- National Wetland SDE wetlands
- Wetland Determination Identifiers
- Restricted Use
- Limited Restrictions
- Exempt from Conservation Compliance Provisions

Disclaimer: Wetland identifiers do not represent the size, shape or specific determination of the area. Refer to your original determination (CPA-026 and attached maps) for exact wetland boundaries and determinations, or contact NRCS.

THIS MAP IS FOR FSA PROGRAM PURPOSES ONLY.
ALL ACRES NON-IRRIGATED