

**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**  
**POST-HEARING DATA REQUESTS TO KENTUCKY UTILITIES COMPANY**

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June 3, 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. POST-HEARING DATA REQUESTS

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

Please provide a detailed map of the portion of Route D on the Western 345 kV Transmission Line that identifies the two residential structures KU would have to purchase in order to construct the proposed Western 345 kV Transmission Line along Route D. Please make certain the map includes the proposed centerline, the 100' right-of-way boundaries and the 500' corridor boundaries on each side of the proposed centerline.

**Response.**

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

Please identify in detail the basis for having to purchase two residences in order to construct the proposed Western 345 kV Transmission Line along Route D, including the authority supporting your response.

**Response.**

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

Please provide any and all documentation of any kind that is in KU's custody, possession or control that arises from or relates to the determination of values and weights assigned to the perspectives, layers and features of the siting model used in this case.

**Response.**

**Request No. 4.**

Please provide any and all documentation of any kind that is in KU's custody, possession or control that arises from or relates to the determination of the categories and weights assigned to the expert judgment analysis used in this case.

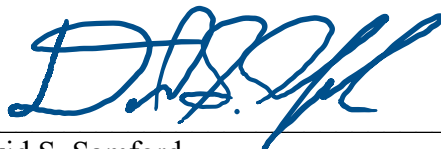
**Response.**

**Request No. 5.**

Please provide a copy of the application submitted to the U.S. Army Corps of Engineers for the project that is the subject of KU's application.

**Response.**

Respectfully submitted,



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*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 3<sup>rd</sup> day of June 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 read 'D. A. [unclear]', is written over a horizontal line.

*Counsel for Wade Family Farm Management, LLC* .