

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) CASE NO. 2022-00066
THE CONSTRUCTION OF TRANSMISSION)
FACILITIES IN HARDIN COUNTY, KENTUCKY)

RESPONSE OF
KENTUCKY UTILITIES COMPANY
TO
HAGAN PROPERTY OWNERS' INITIAL DATA REQUESTS
DATED MAY 2, 2022

FILED: MAY 6, 2022

VERIFICATION

COMMONWEALTH OF KENTUCKY)
)
COUNTY OF JEFFERSON)

The undersigned, **Robert M. Conroy**, being duly sworn, deposes and says that he is Vice President, State Regulation and Rates, for Kentucky Utilities Company and an employee of LG&E and KU Services Company, and that he has personal knowledge of the matters set forth in the responses for which he is identified as the witness, and the answers contained therein are true and correct to the best of his information, knowledge, and belief.



Robert M. Conroy

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 5th day of May 2022.



Notary Public

Notary Public ID No. 603967

My Commission Expires:

July 11, 2022

KENTUCKY UTILITIES COMPANY

**Response to Hagan Property Owners'
Initial Request for Information
Dated May 2, 2022**

Case No. 2020-00066

Question No. 1

Responding Witness: Robert M. Conroy / Elizabeth J. McFarland

- Q-1. Please specify the total load (annualized) KU will initially provide to the Ford facility upon the scheduled opening date.
- A-1. As Ms. McFarland described in her testimony at page 2, based on current information provided by Ford, each battery facility is expected to require 160MW for a total need of 320MW. As Ms. McFarland described in her testimony at page 5, Ford has requested an August 2023 in-service date for electric service based on Ford's anticipated early 2024 full scale production date for the first battery facility.

KENTUCKY UTILITIES COMPANY

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Question No. 2

Responding Witness: Robert M. Conroy / Elizabeth J. McFarland

- Q-2. What will be the total load (annualized) KU will provide to the Ford facility when the facility reaches capacity? What is the projected date of the load maturity?
- A-2. See the response to Question No. 1.

KENTUCKY UTILITIES COMPANY

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Question No. 3

Responding Witness: Robert M. Conroy / Elizabeth J. McFarland

- Q-3. What will be the Ford facility's load profile at maturity (peak capacity)?
- A-3. KU continues to work with Ford to gain a full understanding of the load profile for each of the battery facilities. As discussed in response to Question No. 1, Ford has provided the expected demand of 160 MW for each battery facility with a total expected demand of 320 MW for its site. KU does not have the requested information at this time.

KENTUCKY UTILITIES COMPANY

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Question No. 4

Responding Witness: Robert M. Conroy / Elizabeth J. McFarland

- Q-4. What percentage of KU's Hardin County Kentucky load will the Ford facility consume initially?
- A-4. Based on current estimates of Ford's consumption and assuming consumption (MWh) in 2021 for KU's existing Hardin County customers remains unchanged, Ford's facility would represent approximately 60% of KU's annual load delivered to customers in Hardin County, Kentucky in its first full year of initial operations.

KENTUCKY UTILITIES COMPANY

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Question No. 5

Responding Witness: Robert M. Conroy / Elizabeth J. McFarland

- Q-5. What percentage of KU's Hardin County load will the Ford facility consume at maturity (peak load)?
- A-5. Based on current estimates of Ford's consumption and assuming consumption (MWh) in 2021 for KU's existing Hardin County customers remains unchanged, Ford's facility would represent approximately 75% of the county's annual consumption in its first full year of full-scale operations.

KENTUCKY UTILITIES COMPANY

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Question No. 6

Responding Witness: Elizabeth J. McFarland

- Q-6. What were the total number of alternate routes considered for the Eastern Route 345 kV transmission line?
- A-6. The Team Spatial Siting Study is a comprehensive data-driven analysis of all possible routes within the study area. It applied the Kentucky Siting Model to the EPRI-GTC Siting Methodology in determining the corridors inside the study area (Team Spatial Report Page 7 of 87). This methodology evaluates the entire area for identifying potential corridors. These corridors were then used to develop three alternate routes for the East 345 kV line for further evaluation.

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Question No. 7

Responding Witness: Elizabeth J. McFarland

- Q-7. What other routes were considered other the Eastern Route alternatives designated as Alternatives A, B & C?
- A-7. The Team Spatial Siting Study is a comprehensive data-driven analysis of all possible routes within the study area. It evaluates the entire study area for possible corridors. Refer to the EPRI-GTC Siting Methodology (Team Spatial Report Page 7 of 87). Alternatives A, B, and C were routed in these corridors identified in the Team Spatial Report.

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Question No. 8

Responding Witness: Elizabeth J. McFarland

- Q-8. Given the relatively sparse population between the Robey Drive and Mud Splash Road coupled with the closer proximity to the Glendale substation, why were routes that run diagonally from the Robey Drive area to the Highway 222 and Mud Splash Road area considered?
- A-8. Through the Team Spatial Siting Study, the corridor was defined to run diagonally from the Robey Drive area across Highway 222 to maintain the 200 foot right-of-way needed for the 345kV line and minimize impact to residential buildings and places of worship along KY 222.

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Question No. 9

Responding Witness: Elizabeth J. McFarland

- Q-9. What were the evaluation factors and weights established for evaluating the alternate routes A, B & C? Please provide itemized detail (i.e. the evaluation model and mathematical formulae).
- A-9. See the Application, Exhibit 2, Team Spatial Siting Study. Specifically, Figure 64 – Eastern Simple Average (page 74 of 87), Figure 65 – Eastern Alternate Route Graph (page 75 of 87) and Figure 66 – Eastern Expert Judgement Model (Page 77 of 87). Also refer to the EPRI-GTC Siting Methodology, and the Kentucky Siting Model for detailed evaluation methods used on routes A, B, and C.

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Question No. 10

Responding Witness: Elizabeth J. McFarland

Q-10. Why was alternative A not selected over alternative B for the East route? What were the determining factors in proposing Alternative B? Would not Option A be the preferred option in most cases such as it is on the West route?

A-10. Route A was removed from further consideration as quoted below from the Team Spatial Siting Report, page 76 of 87.

“Route A is removed from further consideration because there are 45 residences within 300’ of the centerline and 84 parcels crossed. Therefore, Route A was eliminated from further consideration.”

The determining factors of routes A, B, and C are summarized for the Built, Natural, Engineering, and Simple Average as shown in the Team Spatial Siting Report Figure 65, page 75 of 87.

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Question No. 11

Responding Witness: Elizabeth J. McFarland

- Q-11. What were the scoring differences between East routes A, B, & C? What were the cost differences between A, B & C?
- A-11. See the Team Spatial Report, Pages 69 – 77 of 87 for scoring evaluation details. See the Team Spatial Report, Page 69 of 87 for total project cost analysis.

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Question No. 12

Responding Witness: Elizabeth J. McFarland

- Q-12. Did specific landowners or groups of land owners impact the evaluation or other decisions regarding the route? For example, did land ownership or influence by any current or past politicians or public officials, appraisers or attorneys influence the decision regarding the Eastern route selected?
- A-12. No. The Team Spatial Siting Study uses the EPRI-GTC Siting Methodology, the Kentucky Siting Model to determine route selection.

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Question No. 13

Responding Witness: Elizabeth J. McFarland

- Q-13. Does KU have knowledge of any future development, roads, or future transmission construction plans that impacted the selection of the East route? If so, please disclose the details known.
- A-13. In developing its study, Team Spatial contacted the Kentucky Transportation Cabinet ("KYTC") for road information. All current and future roadway projects that were supplied by KYTC were incorporated into Team Spatial's Siting Study. See page 27 of 87 and Appendix A Page 82 of the study. No future transmission projects are currently planned at this site.

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Question No. 14

Responding Witness: Elizabeth J. McFarland

Q-14. Is KU aware that the property behind Ashe is already publicly owned land (Transportation Cabinet & Economic Development Cabinet)?

A-14. Yes. This is referenced on KU map book attached to the response to PSC 3-3.

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Question No. 15

Responding Witness: Elizabeth J. McFarland

Q-15. Is KU willing to mitigate damages to landowners by utilizing publicly owned land? What methods or criteria does KU use to mitigate damages to owners related to eminent domain?

A-15. KU does not agree with the assertion in the request that landowners sustain damages through the acquisition of property through eminent domain. When an easement is acquired through eminent domain, the property owner receives just compensation.

Public lands, as identified by the Team Spatial Siting report, page 8 of 87, were not available for corridor analysis. KU first works directly with landowners to reach a voluntary agreement and acquire necessary easements in exchange for reasonable compensation. KU considers eminent domain to be a last resort and exercises it only when a voluntary agreement cannot be reached and other suitable alternatives do not exist.

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Question No. 16

Responding Witness: Elizabeth J. McFarland

- Q-16. Why did KU elect to impact two properties (965 Glendale-Hodgenville Rd. W. and 1055 Glendale-Hodgenville Rd. W.) when the proposed transmission line could be routed more easterly where it would only impact one property owner (Ashe) and publicly owned land of the Transportation Cabinet and Elizabethtown-Hardin County Industrial Foundation?
- A-16. The Team Spatial Siting Study is a comprehensive data-driven analysis of all possible routes within the study area and it considers the effects of a route on existing residences. The impact to Ashe's property would have directly impacted the residence and other structures on the Ashe property. This impact would have involved the removal of these structures from the proposed right-of-way. See the Team Spatial Siting Study, Page 63 of 87.

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Question No. 17

Responding Witness: Elizabeth J. McFarland

Q-17. Is KU aware that the property owners at 883 Glendale Hodgenville Road W. (Parcel 207-00-00-032), 1055 Glendale-Hodgenville Road W. (Parcel 207-00-00-030, and 965 Glendale-Hodgenville Rd. W. (Parcel ID 207-00-00-031) have already had land taken for the Ford facility and/or the Highway 222 road project?

A-17. Yes.

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Question No. 18

Responding Witness: Elizabeth J. McFarland

- Q-18. What is the total design/build cost per line mile for KU's proposed Eastern route 345 kV Line, alternative B?
- A-18. The costs per mile for Route B is approximately \$4 million per mile. See the Team Spatial Siting Report, Figure 59 – Eastern Routes Data, Page 69 of 87 for both route costs and line lengths for Route B.

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Question No. 19

Responding Witness: Elizabeth J. McFarland

Q-19. Will KU operate a solar farm on any of the megasite property? If yes to the previous question, what will be the capacity of the solar farm?

A-19. At this time, it is unknown whether there will be a solar farm on any portion of the Glendale Megasite property.

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Question No. 20

Responding Witness: Elizabeth J. McFarland

- Q-20. Does KU have knowledge of additional rights of way required and/or planned for solar farm interconnections?
- A-20. No, at this time, KU does not have knowledge of additional rights-of-way required and/or planned for solar farm interconnections at the Glendale Megasite.

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Question No. 21

Responding Witness: Robert M. Conroy

- Q-21. What is KU's projected revenue (annualized) from the Ford plants?
- A-21. KU continues to work with the Customer to finalize the electrical requirements including electric demand, load profile and other design specifications to meet the short and long term service needs of the Glendale Megasite. The requested information is not available in final form at this time. The preliminary estimates of projected revenue are considered confidential and proprietary to both KU and the Customer; the request is not reasonably calculated to lead to the discovery of relevant information in this case.

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Question No. 22

Responding Witness: Robert M. Conroy

- Q-22. What is the KU's projected revenue (annualized) to be generated from the solar farm if built on the Ford site?
- A-22. At this time, it is unknown whether there will be a solar farm on any portion of the Glendale Megasite property. See the response to Question No. 19.