COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

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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 COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION DATED APRIL 29, 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

Notary Public

Notary Public ID No. 603967

My Commission Expires:

Jely 11, 2022

VERIFICATION

COMMONWEALTH OF KENTUCKY	
COUNTY OF JEFFERSON	

The undersigned, **Elizabeth J. McFarland**, being duly sworn, deposes and says that she is Vice President, Transmission, for Kentucky Utilities Company and an employee of LG&E and KU Services Company, and that she has personal knowledge of the matters set forth in the responses for which she is identified as the witness, and the answers contained therein are true and correct to the best of her information, knowledge, and belief.

Elizabeth J. McFarland

Beth Mcfall

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

Notary Public

Notary Public ID No. 603967

My Commission Expires:

July 11, 2025

KENTUCKY UTILITIES COMPANY

Response to Commission Staff's Third Request for Information Dated April 29, 2022

Case No. 2022-00066

Question No. 1

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

- Q-1. Refer to KU's response to Wade Farm Management, LLC's First Request for Information (filed April 21, 2022) (Wade Farm's First Request), Item 5, and KU's response to Frank Brown and Martha Brown's First Request for Information (filed April 21, 2022) (Brown's First Request), Item 3. In these responses KU references working with the property owners. Confirm that KU did not give notice to property owners within the 1,000-foot corridor of the proposed centerline, unless the proposed transmission line route passed directly over the property.
- A-1. KU has not provided notice to property owners within the 1,000 foot corridor unless the proposed transmission line route and 200 foot right of way directly crosses over the property. (See Paragraph 10 of KU's Application and Ms. McFarland's testimony, page 9).

KENTUCKY UTILITIES COMPANY

Response to Commission Staff's Third Request for Information Dated April 29, 2022

Case No. 2022-00066

Question No. 2

Responding Witness: Elizabeth J. McFarland

- Q-2. Refer to KU's response to Wade Farm's First Request, Item 22. This response indicates KU has not conducted any on-site field studies.
 - a. Confirm that KU has not done any on-site field studies.
 - b. State when KU anticipates performing on-site field studies.
 - c. Refer also to the Application, numbered paragraph 4, which states that KU anticipates beginning pre-construction in July 2022. Explain what preconstruction activities KU anticipates beginning in July 2022, given that the statutory deadline for issuance or denial of the requested CPCN is June 28, 2022, and no on-site field studies have been performed.

A-2.

- a. At the time of the original filing KU had not begun field studies; however at this time KU has completed an on-site field wetland delineation survey within the proposed 200 foot right of way. Also, KU has completed on-site field geotechnical exploration (borings) at select locations along the proposed route. The wetland delineation confirmed the lines could be constructed outside of wetlands. The geotechnical exploration provides further documentation for structure foundation design.
- b. KU is currently performing on-site field geotechnical exploration at the proposed drilled shaft foundation locations. This work is anticipated to be completed in May 2022. All wetland delineation surveys are completed.
- c. In paragraph 4 of the Application, pre-construction in July 2022 refers to the substation site preparation work such as vegetation clearing, placement of soil erosion and storm water controls. Transmission lines would also likely begin pre-construction work in July 2022 which would include structure/foundation staking, as well as vegetation clearing, placement of soil erosion and storm water controls.

KENTUCKY UTILITIES COMPANY

Response to Commission Staff's Third Request for Information Dated April 29, 2022

Case No. 2022-00066

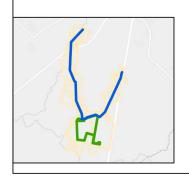
Question No. 3

Responding Witness: Elizabeth J. McFarland

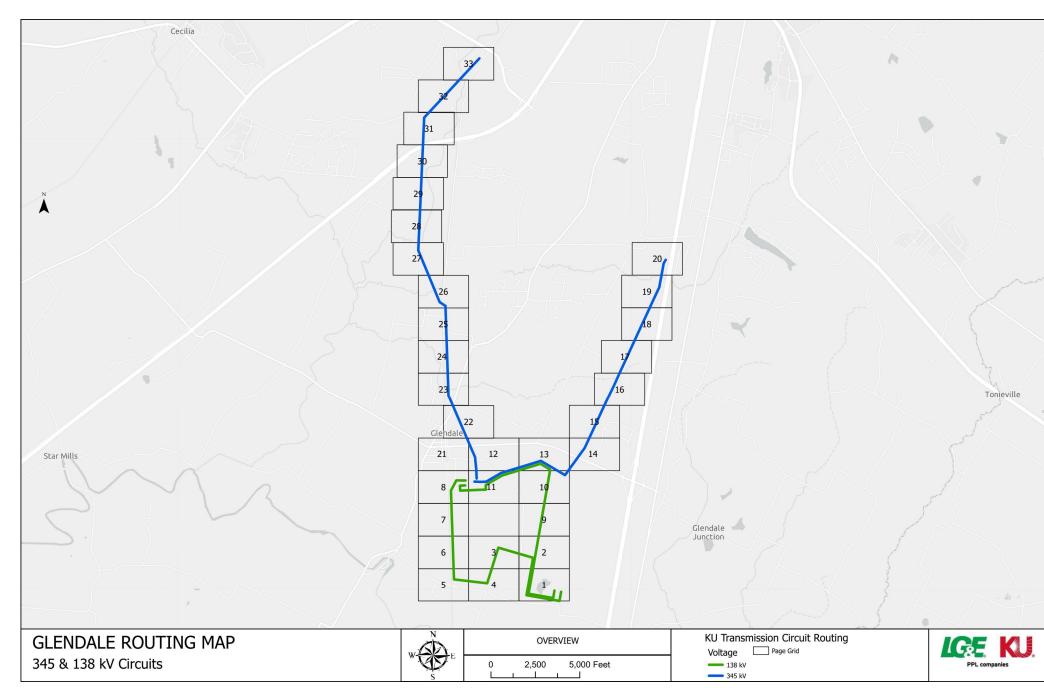
- Q-3. Provide a map of the existing KU easements as well as any other known utility easements for the properties directly affected by all the transmission line routes superimposed on the maps provided in KU's response to Commission Staff's First Request for Information (filed April 8, 2022), Item 1.
- A-3. Due to the number of utility easements (e.g., electric transmission, electric distribution, natural gas, water, sewer, telecommunication, etc., some of which are as small as 10 feet wide) on the affected properties, KU estimates that it would require at least 30 45 days to complete this mapping request. However, in an effort to be as responsive as possible, the attached map book illustrates the easements that are relatively large and material in nature (e.g., electric transmission, and large sewage lines) on the affected properties.

KENTUCKY UTILITIES GLENDALE (FORD) PROJECT

345 & 138 kV TRANSMISSION ROUTING MAPS



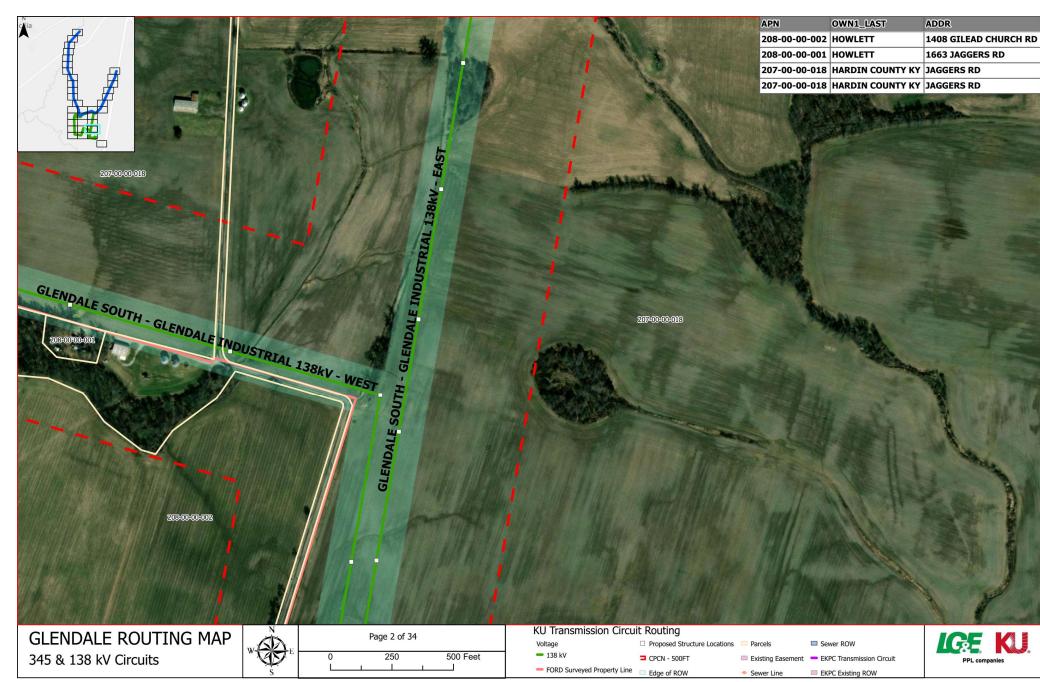




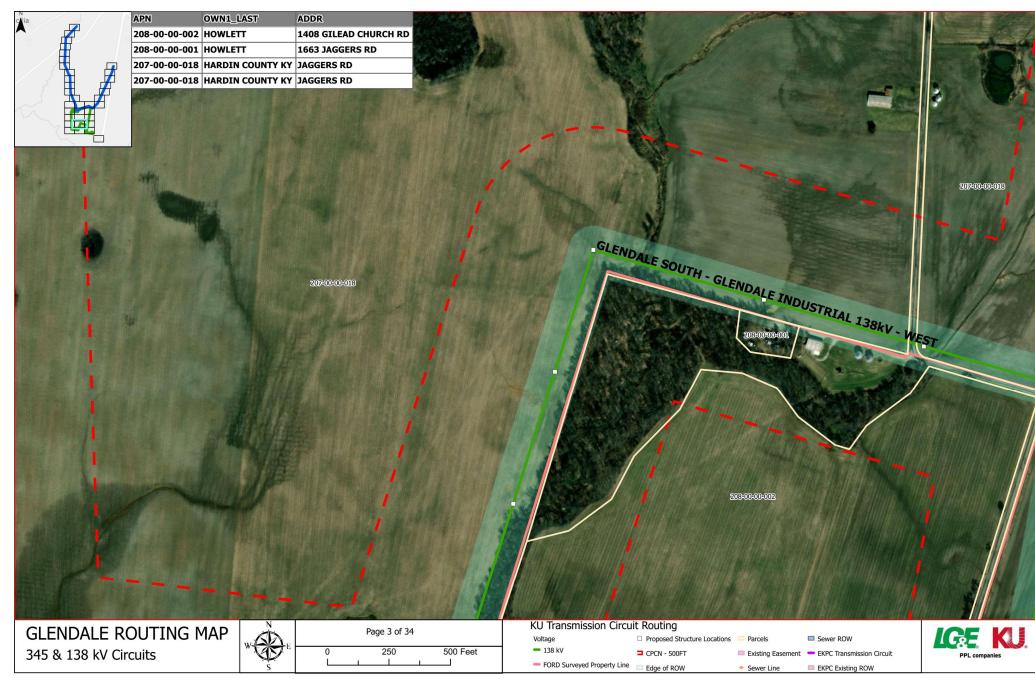
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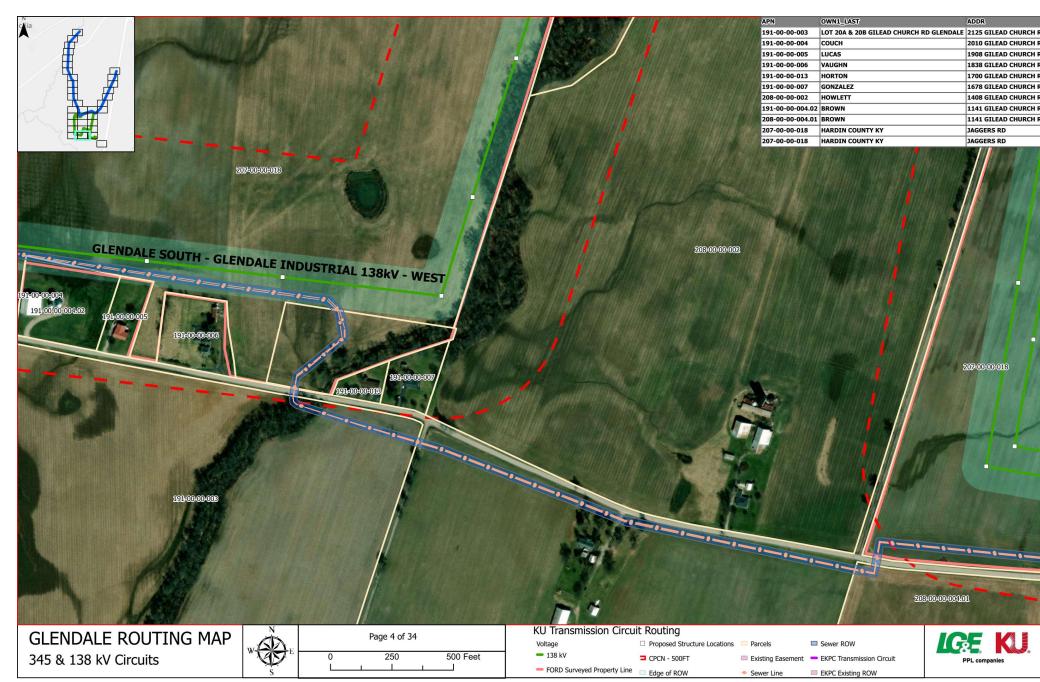
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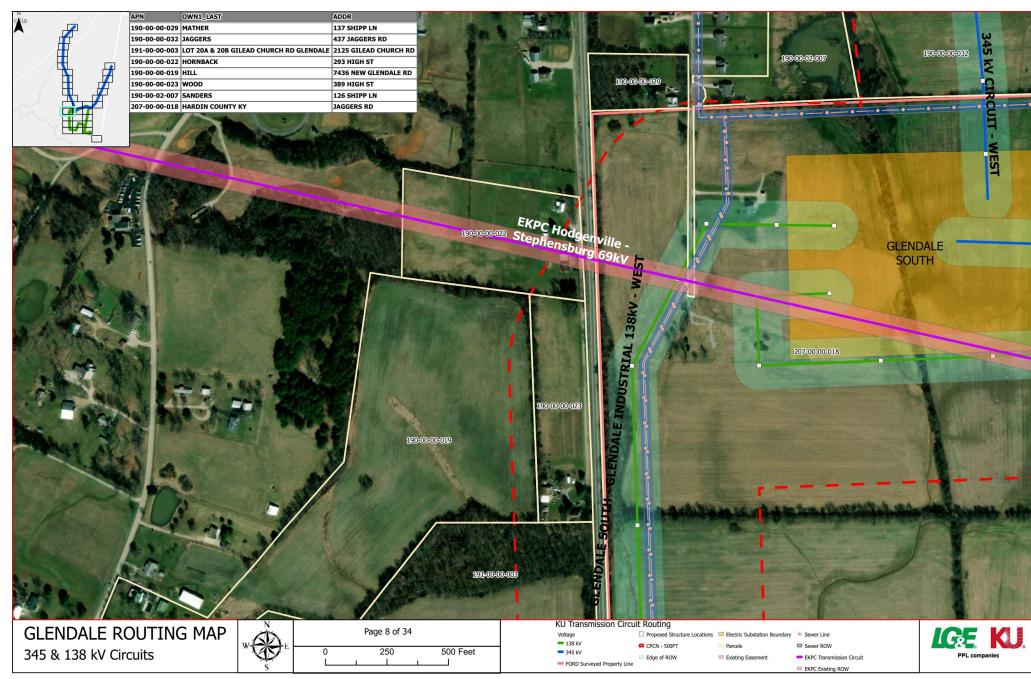


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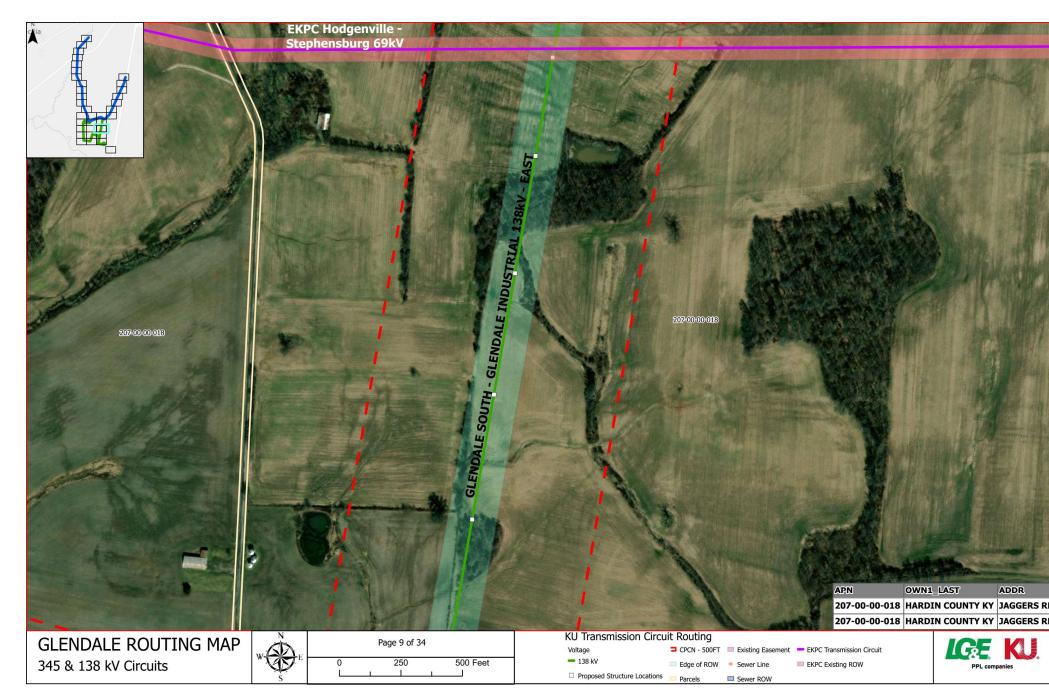


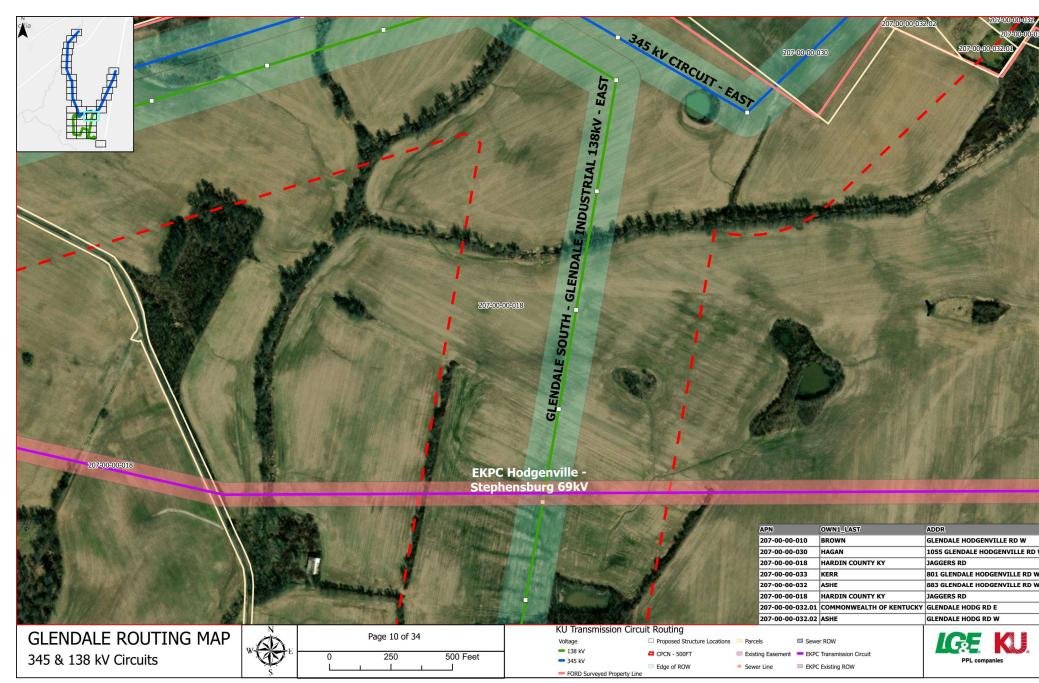
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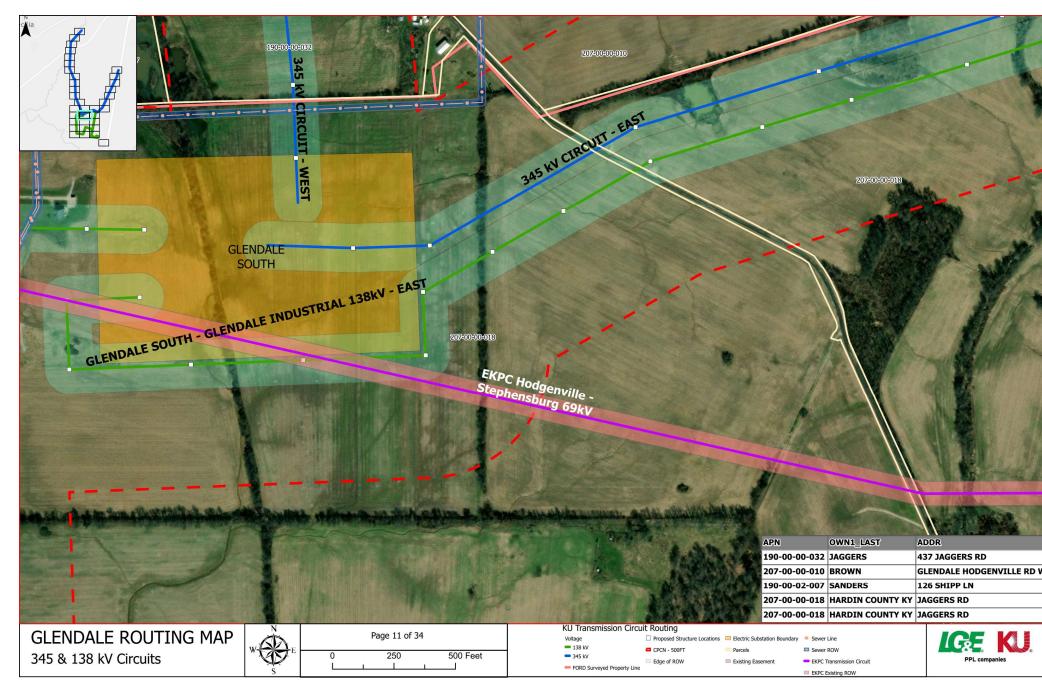


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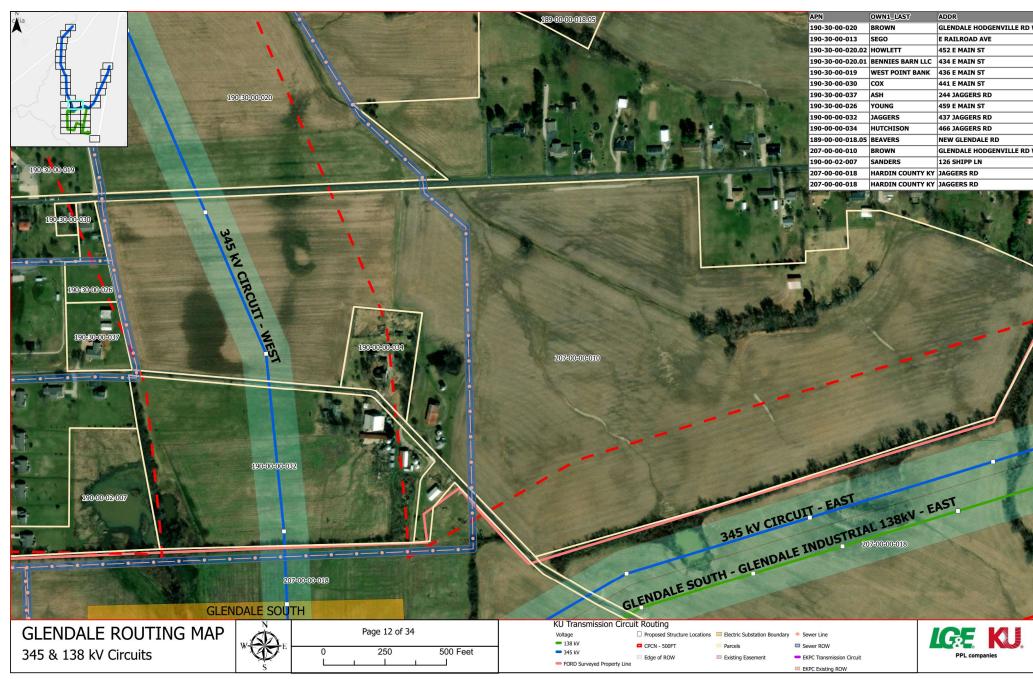




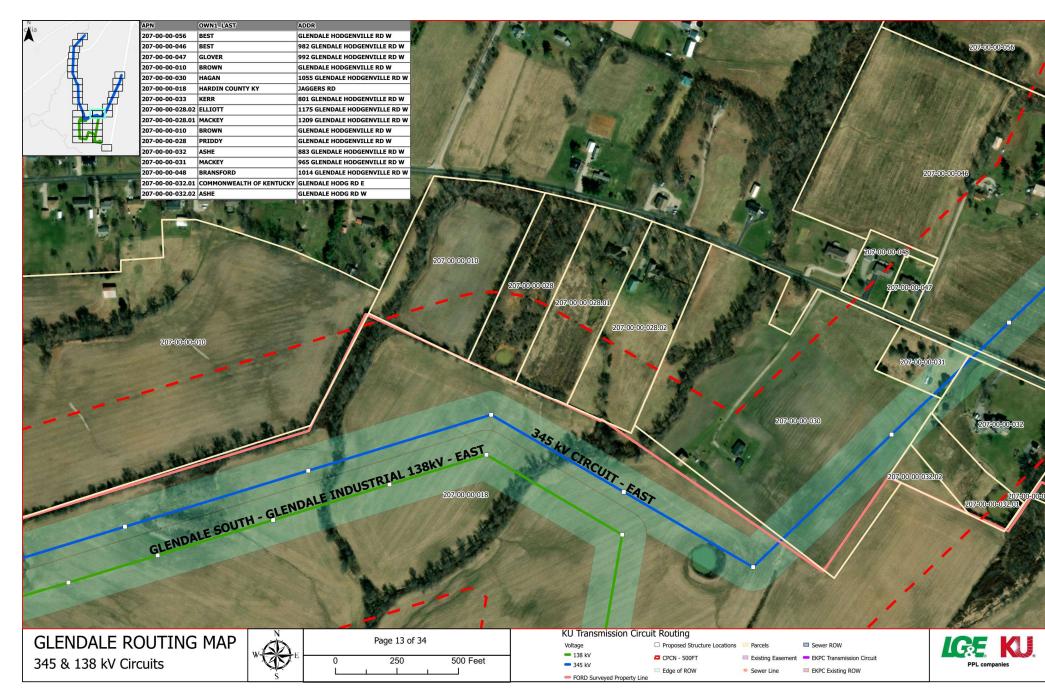
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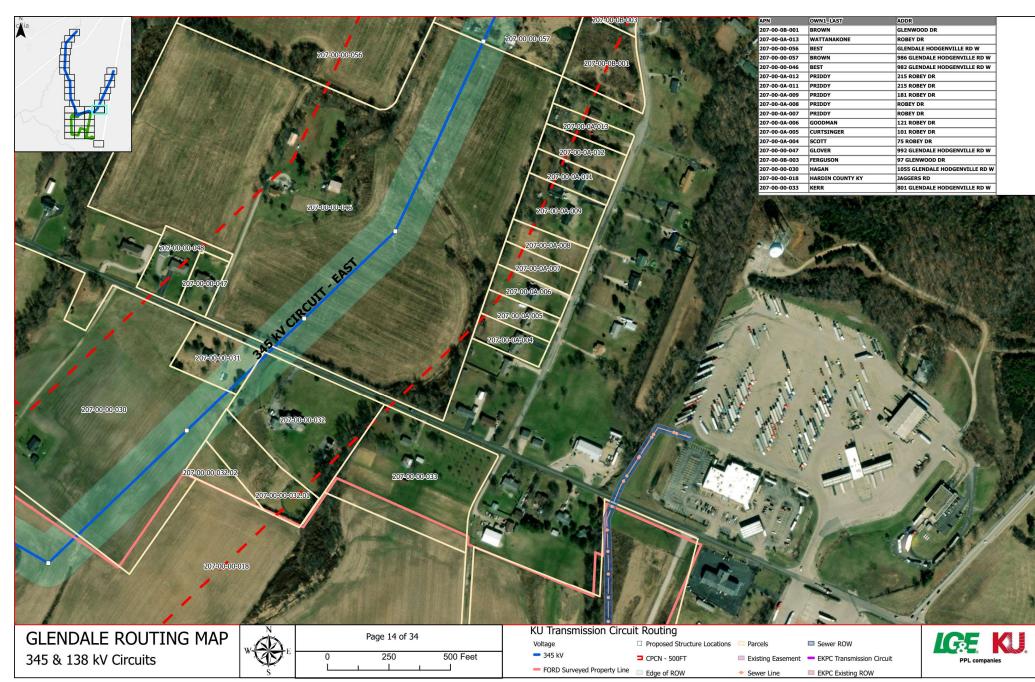
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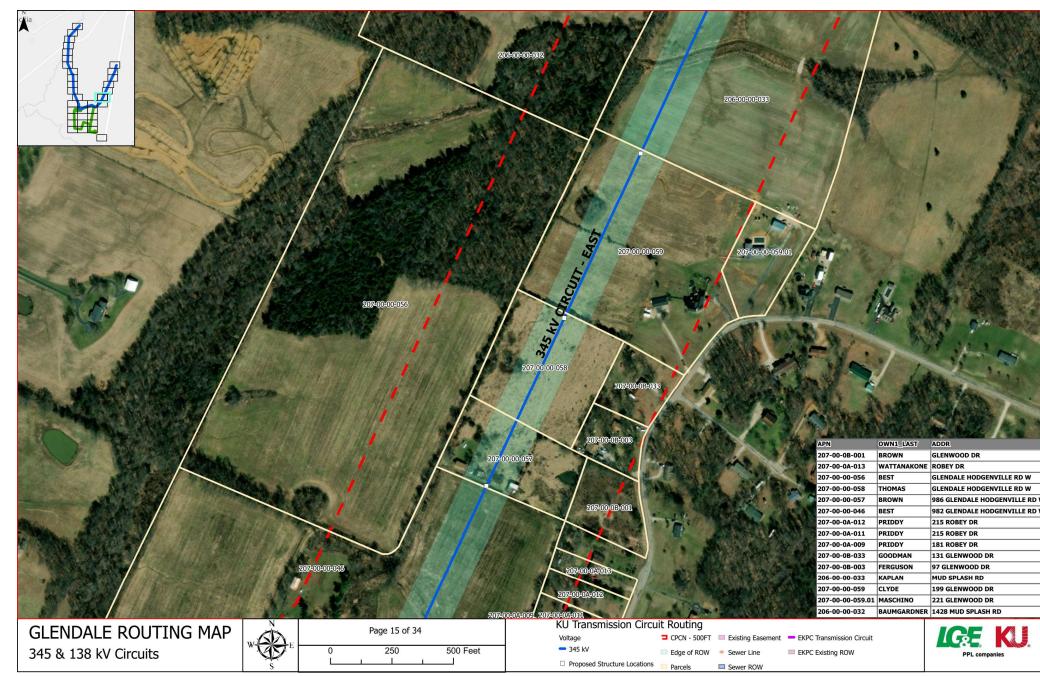


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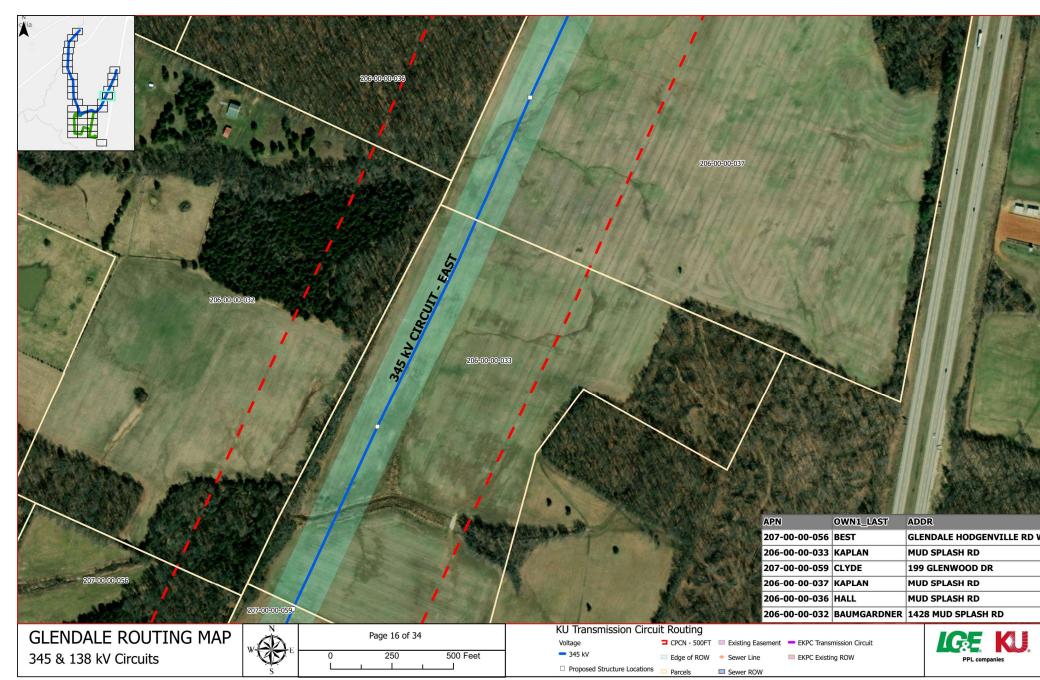


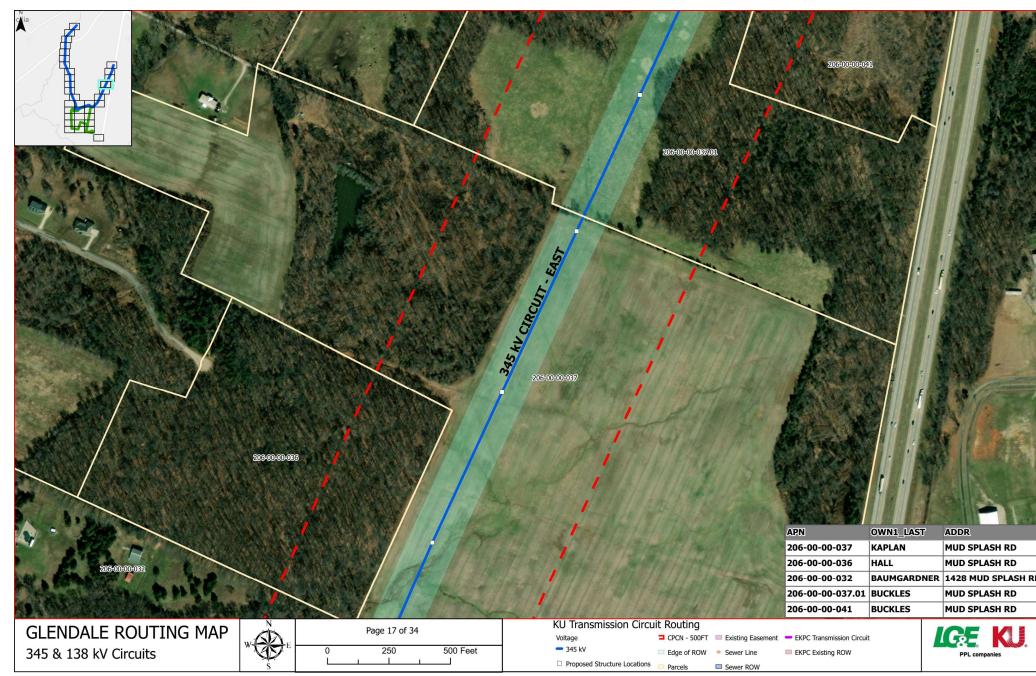
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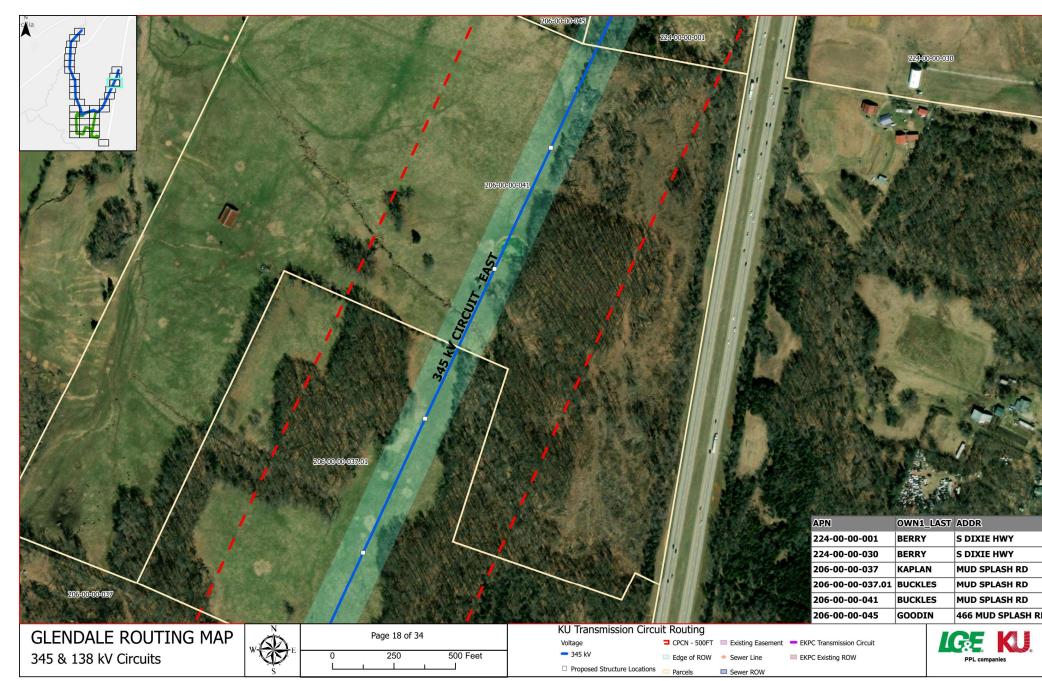


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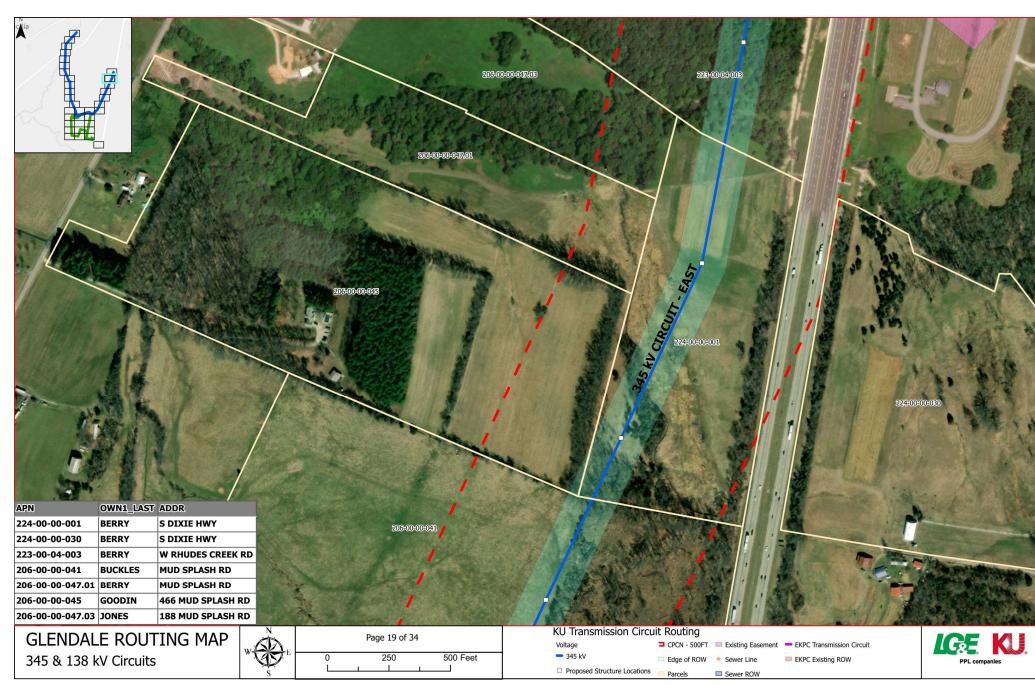


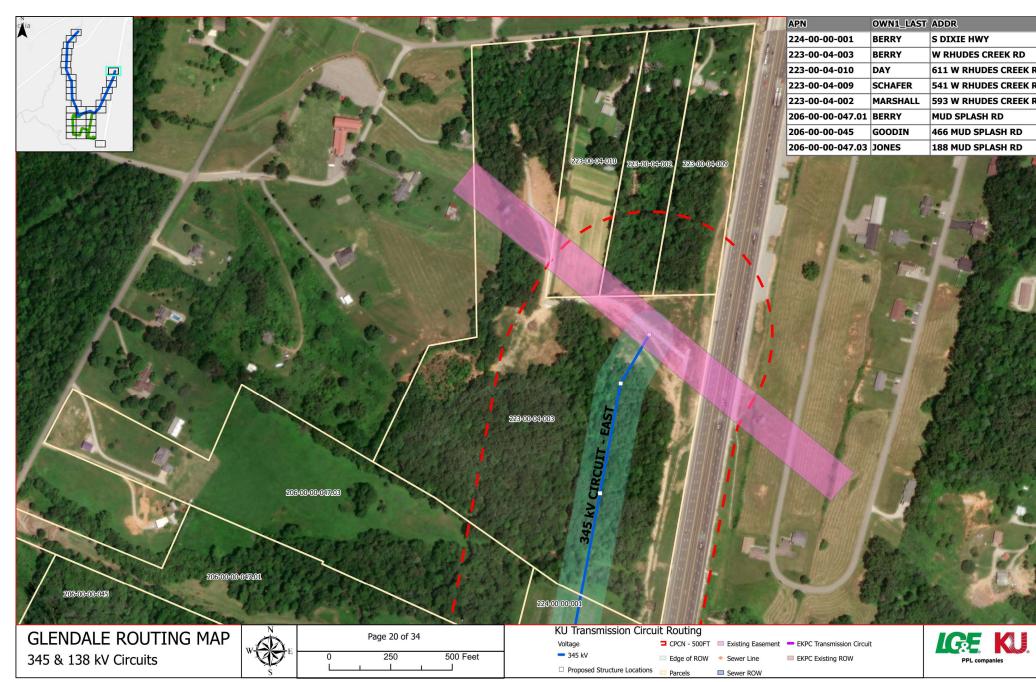


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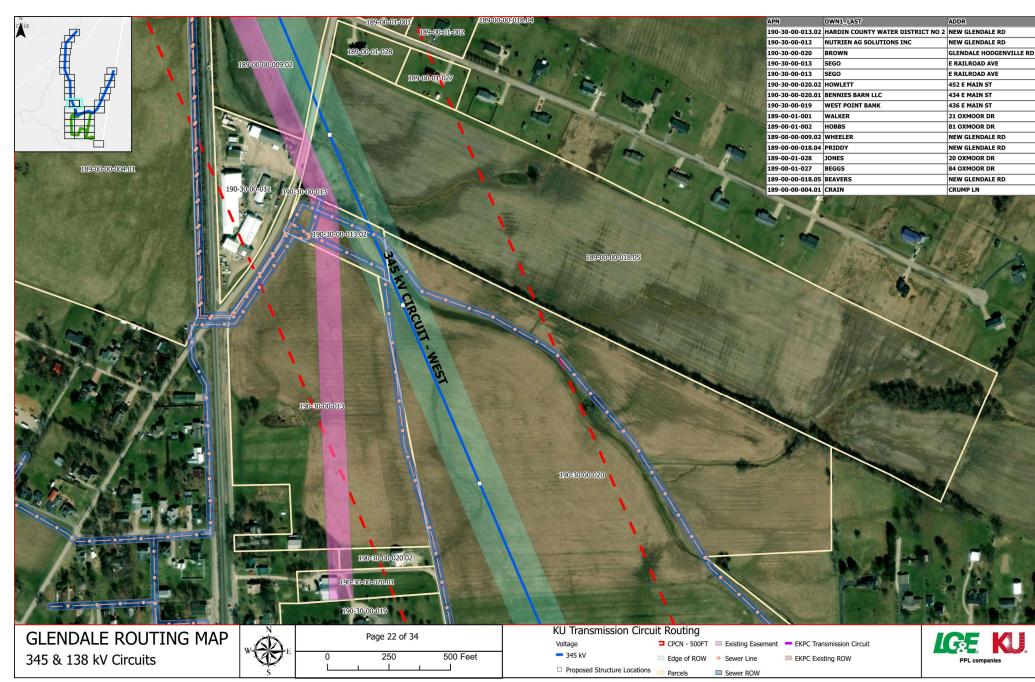


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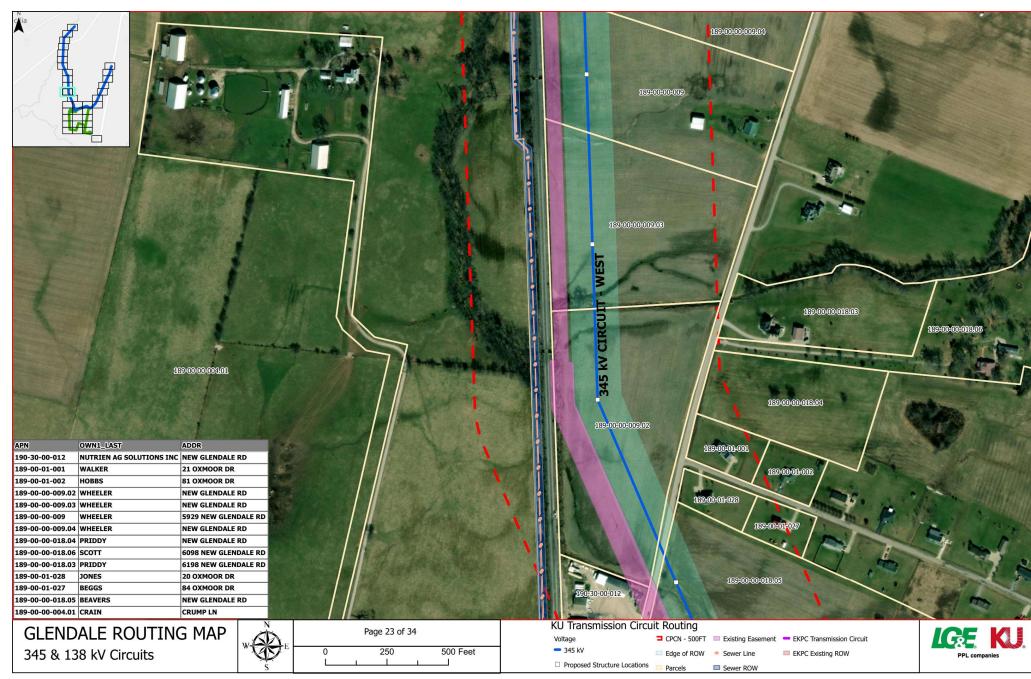


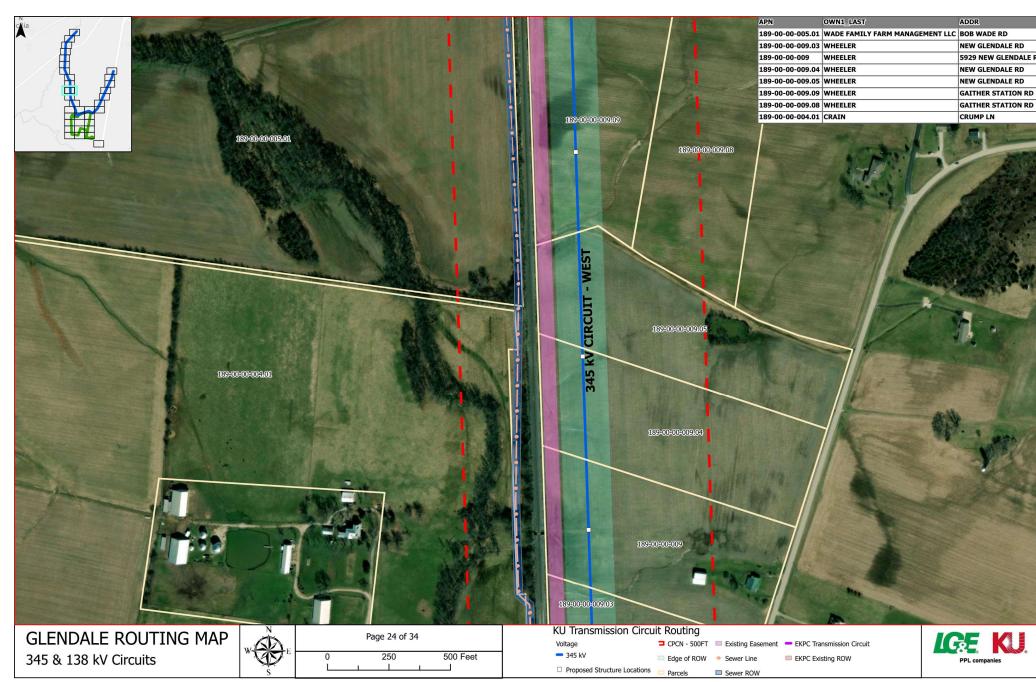


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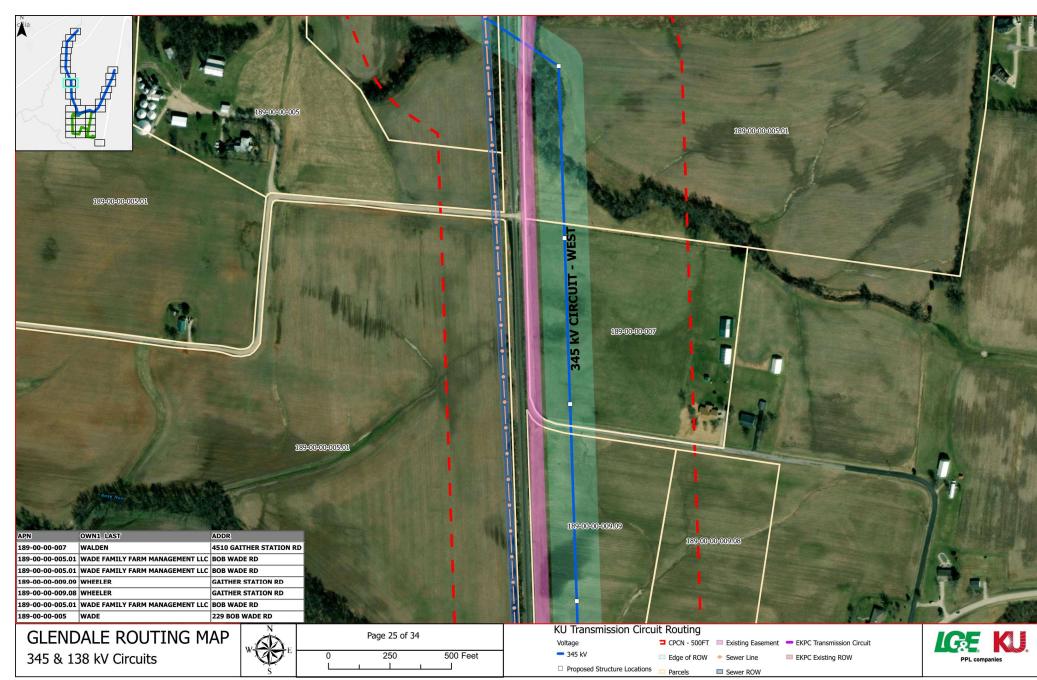


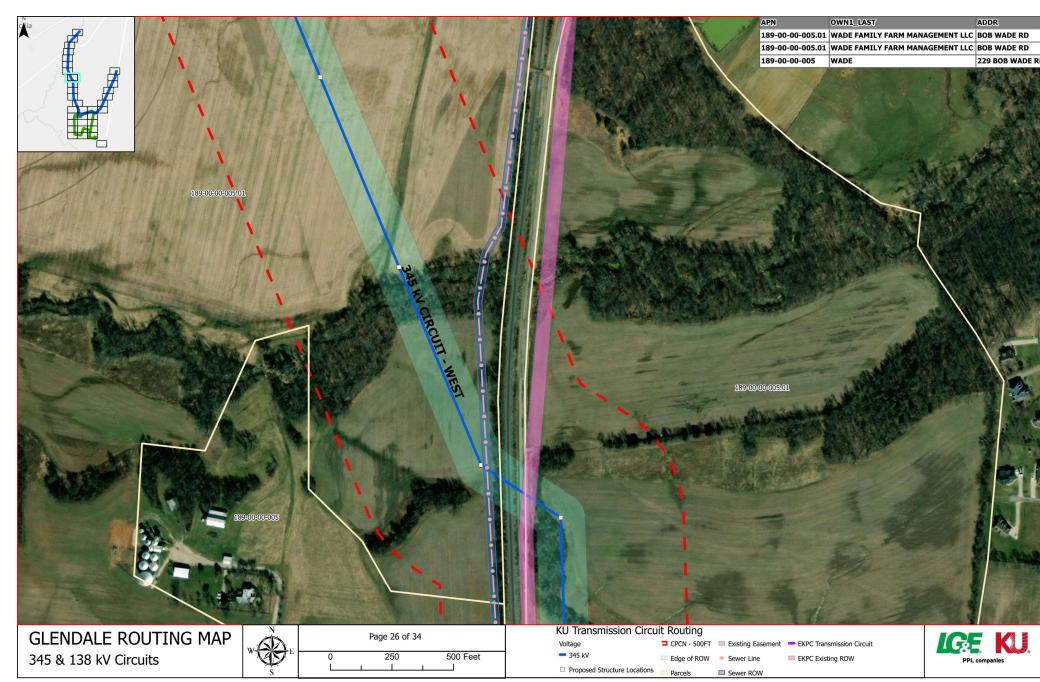
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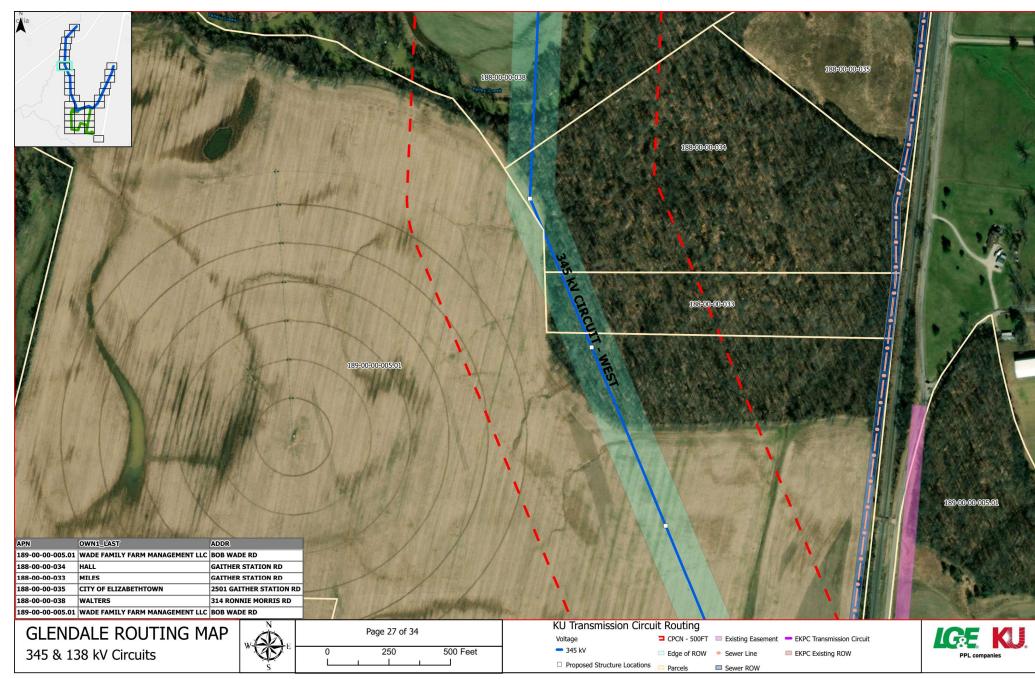


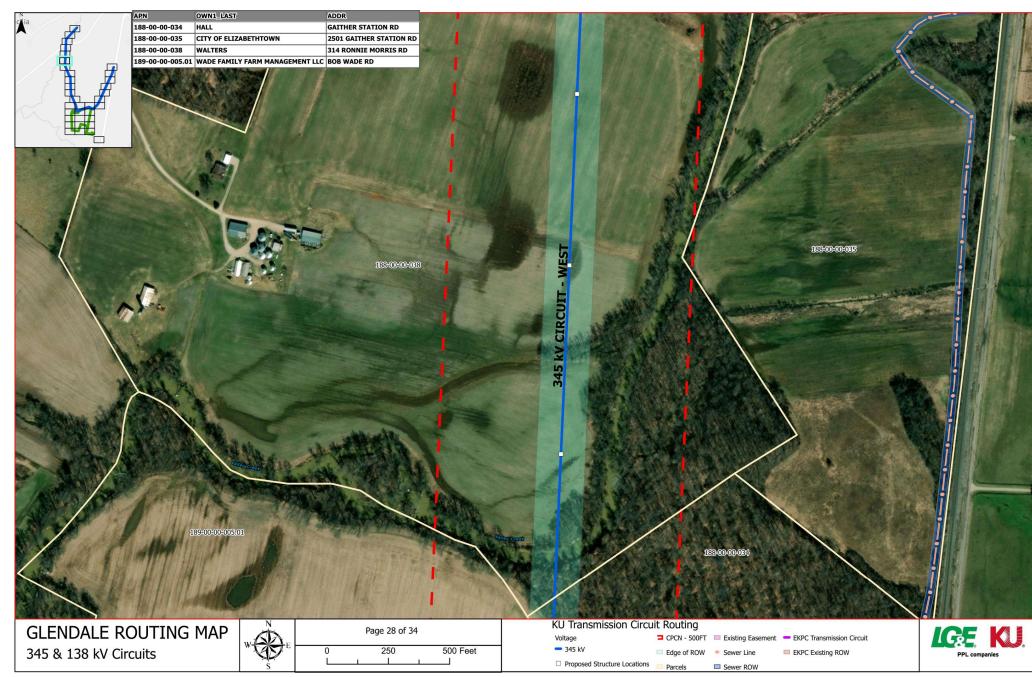
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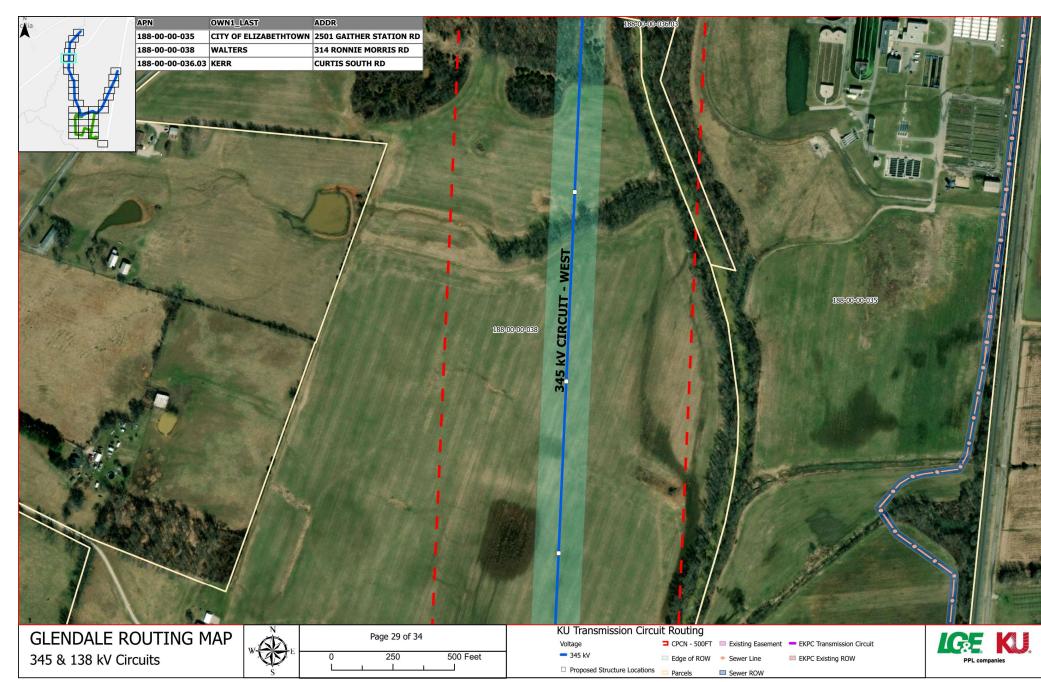




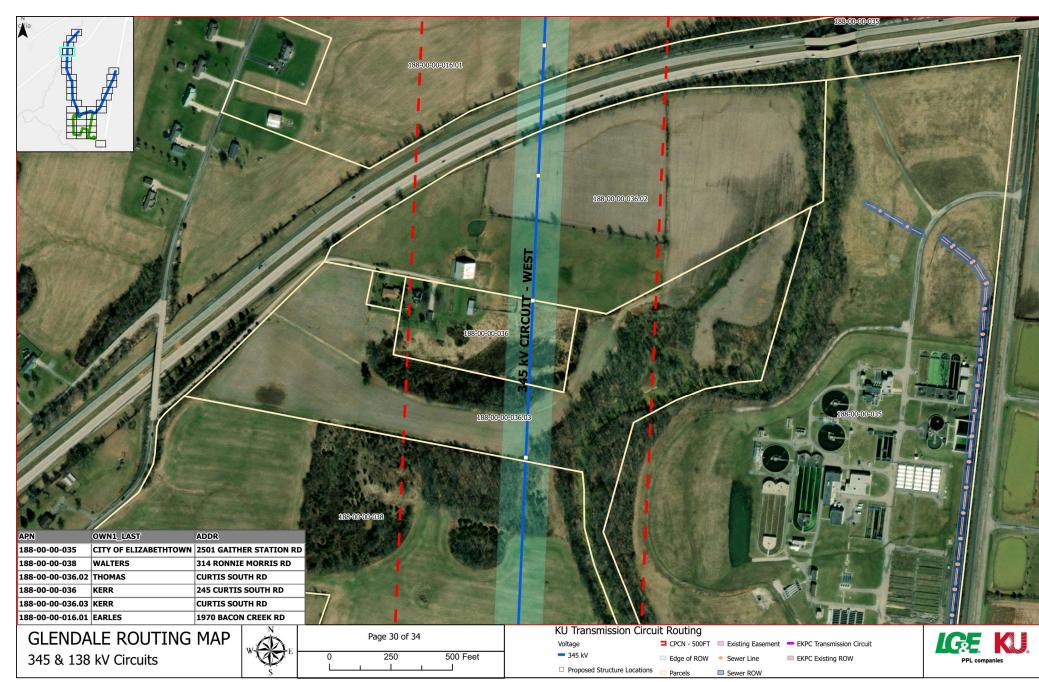
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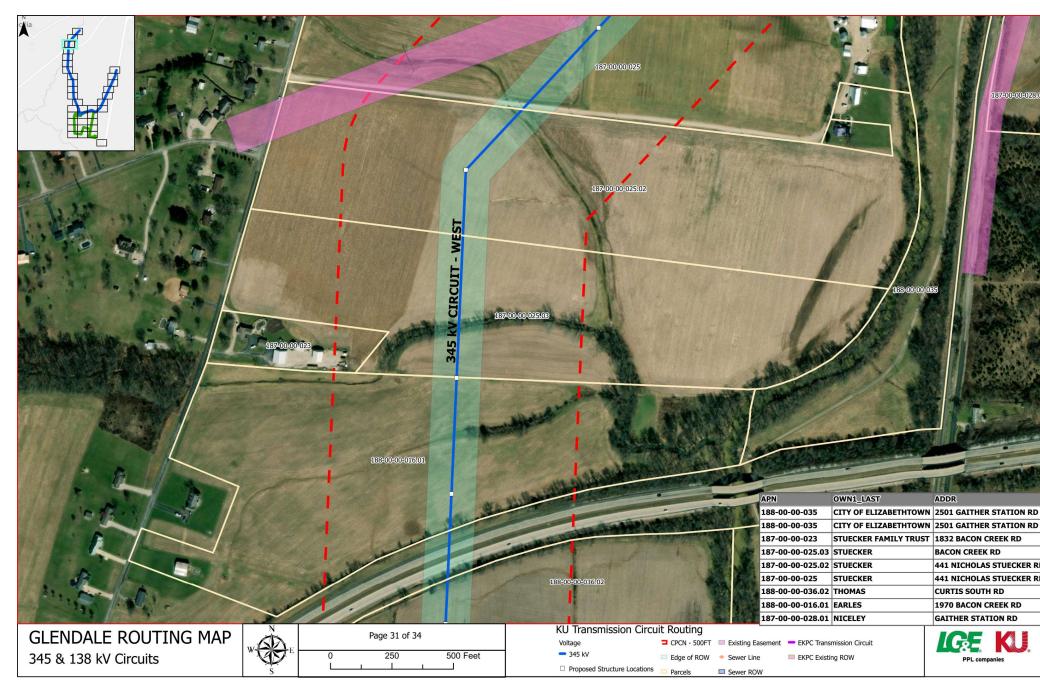




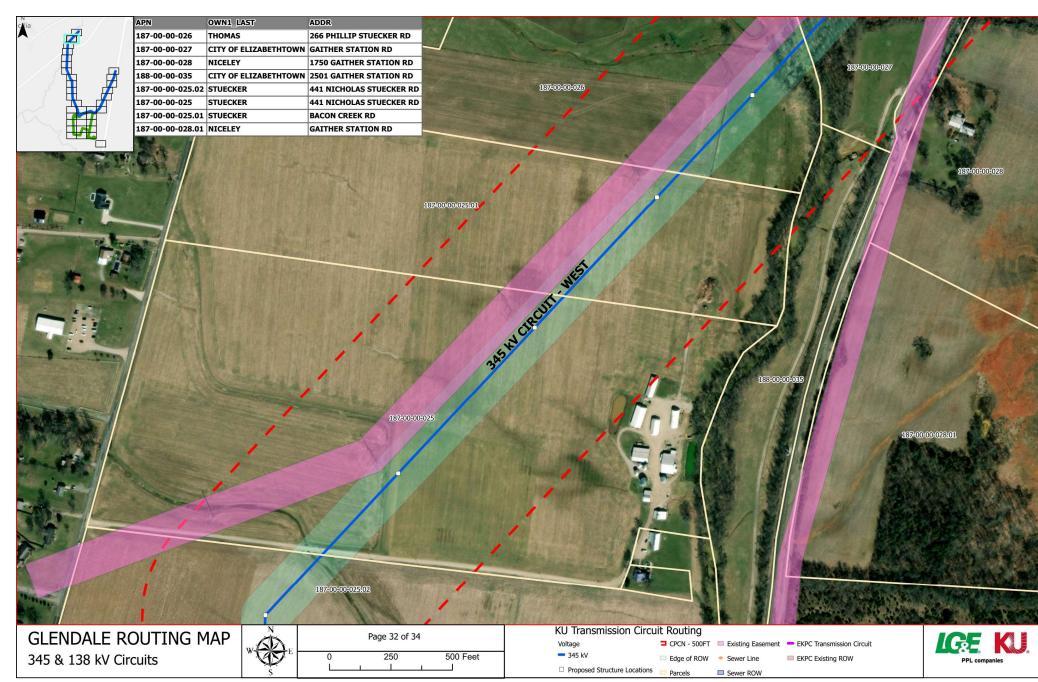


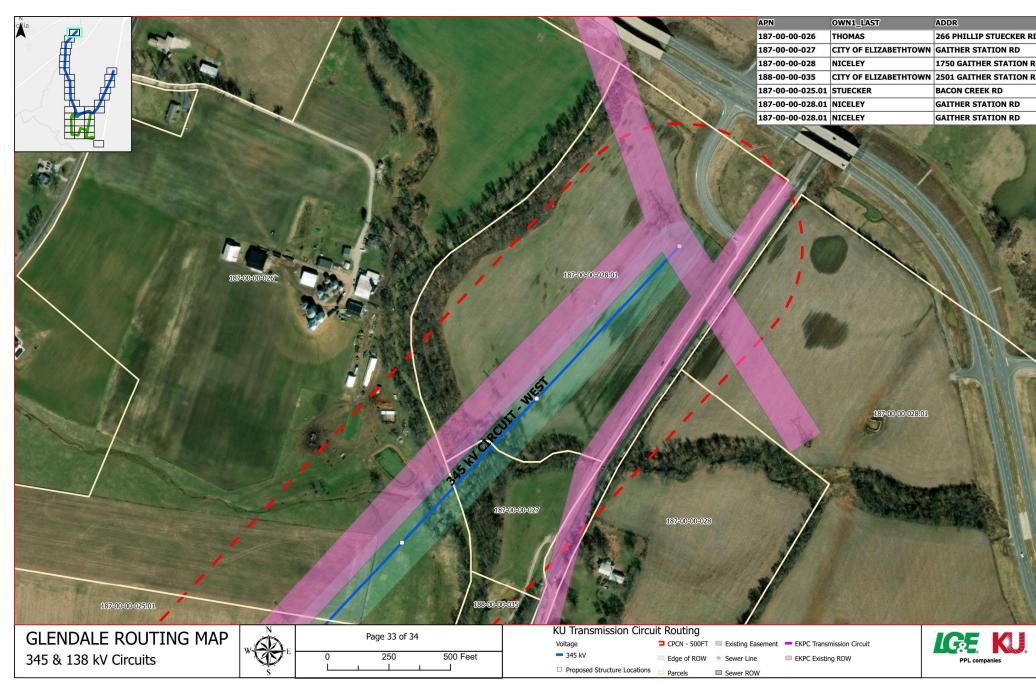
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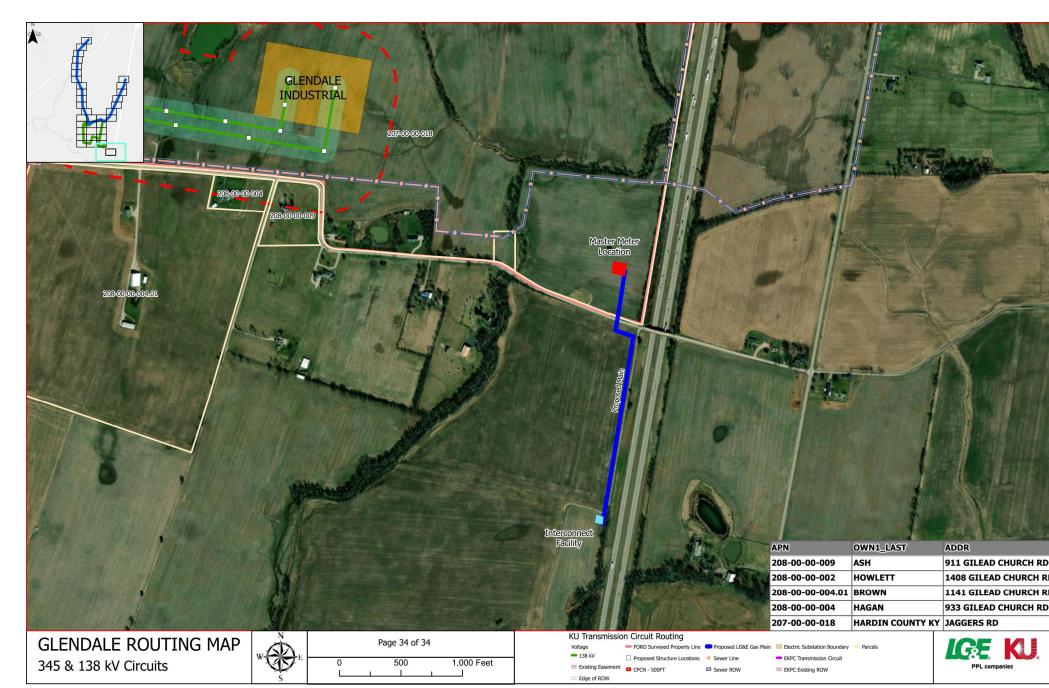


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224-00-00-001 E	BERRY	S DIXIE HWY	188-	00-00-036	KERR	245 CURTIS SOUTH RD	[:	189-00-00-005	WADE	229 BOB WADE RD
224-00-00-030 E	BERRY	S DIXIE HWY	188-	00-00-036.03	KERR	CURTIS SOUTH RD	- [:	187-00-00-028.01	NICELEY	GAITHER STATION RD
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191-00-00-004 C	соисн	2010 GILEAD CHURCH RD	189-	00-00-009	WHEELER	5929 NEW GLENDALE RD	- [208-00-00-004	HAGAN	933 GILEAD CHURCH RD
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188-00-00-035 C	CITY OF ELIZABETHTOWN	2501 GAITHER STATION RD	189-	00-00-005.01	WADE FAMILY FARM MANAGEMENT LLC	BOB WADE RD	- [207-00-00-032.02	ASHE	GLENDALE HODG RD W
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187-00-00-025 S	STUECKER	441 NICHOLAS STUECKER RD	189-	00-01-027	BEGGS	84 OXMOOR DR	:	208-00-00-006	MEADOWVIEW FARMS INC	949 GILEAD CHURCH RD
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188-00-00-038 V	WALTERS	314 RONNIE MORRIS RD	223-	00-04-009	SCHAFER	541 W RHUDES CREEK RD	-			-

GLENDALE ROUTING MAP

345 & 138 kV Circuits

COMPLETE LIST OF ADJACENT PROPERTY OWNERS



Response to Commission Staff's Third Request for Information Dated April 29, 2022

Case No. 2022-00066

Question No. 4

- Q-4. Explain whether KU considered future load requirements in the location of the proposed transmission line routes and proposed substations, and if so, how this affected the routes and locations chosen.
- A-4. KU considered current and future load requirements when locating the proposed substations on the Glendale Megasite. The substations were located based upon the master plan for the development of the Glendale Megasite as well as considerations for future growth needs outside of the Glendale Megasite. The 345kV transmission lines were located based upon the Team Spatial Siting Study, which considered the proposed Glendale South Substation location.

Response to Commission Staff's Third Request for Information Dated April 29, 2022

Case No. 2022-00066

Question No. 5

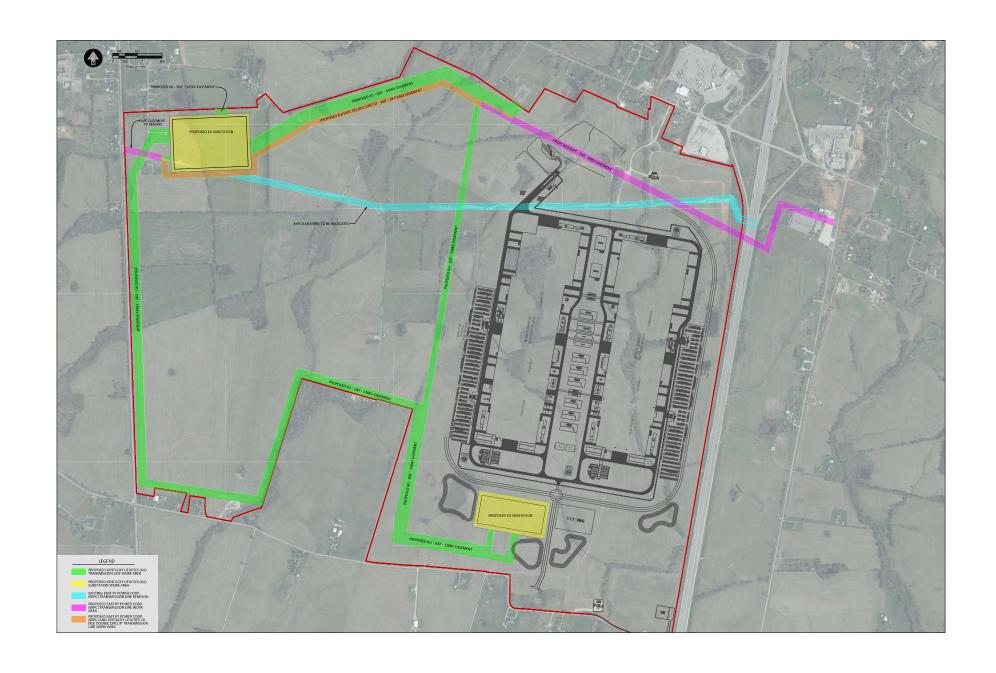
Responding Witness: Elizabeth J. McFarland

- Q-5. Refer to KU's response to Commission Staff's Second Request for Information (filed April 21, 2022) (Staff's Second Request), Item 4.
 - a. Confirm that no additional easements will be requested to place the new East Kentucky Power Cooperative (EKPC) 69 kV line.
 - b. Explain whether EKPC is responsible for removing the 69 kV line and constructing the line again to co-locate with KU's 138 kV line.
 - c. Provide any maps or diagrams depicting the co-location of the new 69 kV EKPC line and the new 138 kV KU line.
 - d. Confirm that the new 69 kV EKPC line will not be serving any of the same area as KU intends to serve with this new construction.

A-5.

- a. The East Kentucky Power Cooperative ("EKPC") line will require a new easement on the Glendale Megasite. This easement is for the relocation of their Hodgenville-Stephensburg 69kV line to be routed across the north-east side of the Glendale Megasite property. It is KUs understanding that EKPC will also be relocating portions of the Hodgenville-Stephensburg 69kV line to the east of I-65 for the KYTC Highway project, however KU is not aware of details regarding that scope of work. The new EKPC line and co-location of the KU/EKPC 69 kV and 138 kV lines are depicted in the attached map requested in part c of this request.
- b. As part of their responsibility, EKPC will be removing its Hodgenville-Stephensburg 69kV line across the Glendale Megasite property and constructing it back across the northern section of the site (see attached map for part c below). EKPC will be responsible for the removal and construction of its line on the Glendale Megasite property per the terms of the *Joint Settlement and Transfer of Service Territories Agreement Pursuant to KRS* 278.016(6) approved by the Commission in Case No. 2021-00462.

- c. See attached.
- d. Confirmed. The Hodgenville-Stephensburg 69kV EKPC line is an existing transmission line that was required to be relocated across the Glendale Megasite and will not be serving any of the KU service territory on the Megasite per the terms of the *Joint Settlement and Transfer of Service Territories Agreement Pursuant to KRS* 278.016(6) approved by the Commission in Case No. 2021-00462.



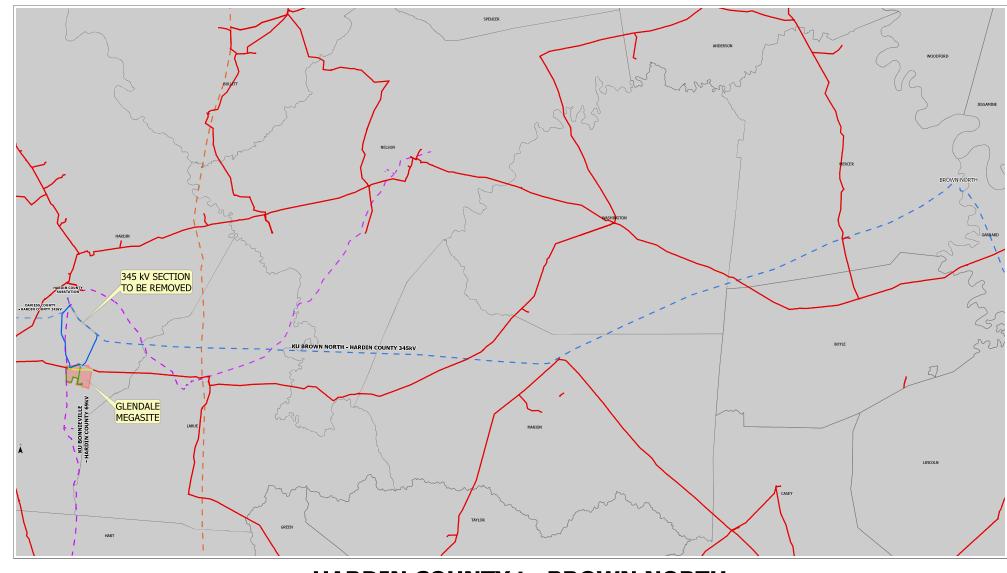
Attachment to Response to PSC-3 Question No. 5
Page 1 of 1
McFarland

Response to Commission Staff's Third Request for Information Dated April 29, 2022

Case No. 2022-00066

Question No. 6

- Refer to KU's response to Staff's Second Request, Item 1. Provide a map that Q-6. illustrates the data request response. Include all the features mentioned in the statement: "... the existing Brown North – Hardin 345kV line will be segmented near the Hardin County Substation (West tap point) and rerouted into and out of the new Glendale South Substation, tying back into the 345kV line at the East tap point (a total of approximately 9 miles of new 345 kV line). The existing 2.7 mile segment of line between the two new tap points will be retired and removed. This will create one 345 kV source into the Glendale South Substation coming from the Hardin County Substation (i.e., the Glendale South – Hardin County 345 kV line), and a second 345 kV source from the Brown North Substation (i.e., the Glendale South – Brown North 345 kV line)." The new map should be similar to the maps in the Application, Exhibit 5, page 1, and Exhibit 6, page 1, without the blue index lines. Symbolize the area of the Glendale Megasite and keep the road network as shown. Include and label the Hardin County Substation, the Brown North Substation, and the proposed Glendale South Substation. Keep the existing and proposed transmission lines as shown in Exhibits 5 and 6 and add symbolization and label the 345 kV transmission line segment that will be retired and removed. Include the existing EKPC 69 kV line as well as the planned EKPC 69 kV line.
- A-6. See attached.



HARDIN COUNTY to BROWN NORTH

"CONFIDENTIAL INFORMATION"



The information contained in/on this media is made without representation or warranty of or any nature by LGSE and KU or any affiliated company, is not guaranteed by LGSE and KU or any affiliated company and is furnished selder for the convenience of the contractor using it.

Unless otherwise indicated, all locations are taken from office records and must be verified in the field prior to any construction where there is a possibility of interference with existing KULGSE facilities.

Legend		
KU Transmission Circuit Routing	KU Electric Transmission Circuit - Existing	EKPC Transmission Circuit
Voltage	Voltage	EKPC Transmission Circuit
69 kV	69 kV	EKPC Transmission Circuit To Be Removed
138 kV	161 kV	- FORD Surveyed Property Line
161 KV	= 345 kV	Glendale Megasite
- 345 kV - 500 kV	345 kV CIRCUIT TO BE REMOVED	_



Kentucky Utilities - Glendale Circuit Routing



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Response to Commission Staff's Third Request for Information Dated April 29, 2022

Case No. 2022-00066

Question No. 7

- Q-7. Provide the amount the retirement and removal of the 2.7 mile segment of the 345 kV line will cost. Explain whether it is included with the cost of this project.
- A-7. The estimated cost for the removal of the 2.7 mile segment of 345kV line is \$1.7 million. This amount was included in the total estimated cost of the project.

Response to Commission Staff's Third Request for Information Dated April 29, 2022

Case No. 2022-00066

Question No. 8

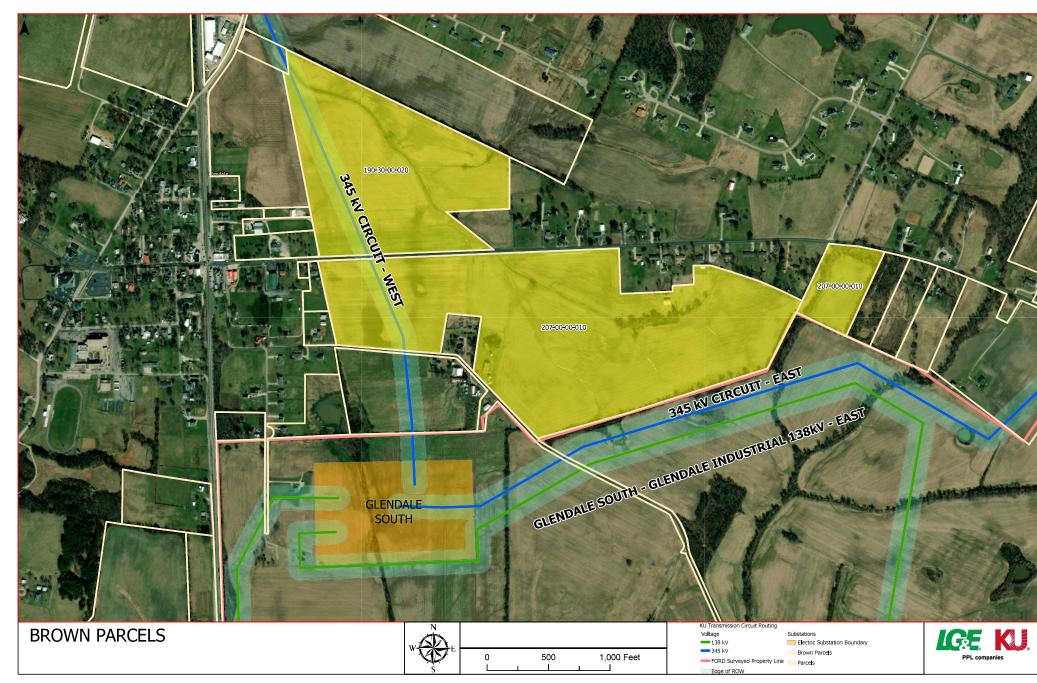
- Q-8. Refer to the Team Spatial Siting Study, page 6, which defines the limits of the study area. Explain why the initial area of study does not extend beyond Route 31W and take into account a further length of the 345 kV line towards the Brown North Substation.
- A-8. The Team Spatial Siting Study encompasses an area that is approximately 2.8 miles by 4 miles. The initial area of the study does not extend beyond Route 31W due to the Brown North Hardin County 345kV line turning to the east and shifting away from the proposed Glendale South Substation site. If KU tapped the Brown North Hardin County 345kV further east, there would be a longer line to construct, additional permitting requirements, additional property owners impacted, and an increase in the total project cost.

Response to Commission Staff's Third Request for Information Dated April 29, 2022

Case No. 2022-00066

Question No. 9

- Q-9. Refer to KU's response to Brown's First Request, Items 11, 12, and 13. Submit a similar map of the Brown parcels with yellow boundaries and the West and East 345 kV routes proposed by KU to the proposed substation.
- A-9. See attached.



Attachment to Response to PSC-3 Question No. 9
Page 1 of 1
McFarland

Response to Commission Staff's Third Request for Information Dated April 29, 2022

Case No. 2022-00066

Question No. 10

Responding Witness: Elizabeth J. McFarland

- Q-10. Clarify how moving the proposed centerline 500 feet for the 345 kV lines is related to the 200-foot right of way (ROW) and the parcel boundaries by commenting on the following two statements:
 - a. If the centerline is moved 500 feet within a parcel, this will keep the centerline and the ROW within a 1,200-foot corridor.
 - b. In order to keep the ROW within a parcel, if the centerline is moved 500 feet or less, it must be 100 feet from the parcel boundary.

A-10.

- a. The corridor was proposed to be 1,000 feet. The centerline could shift 400 feet to ensure it remained in the corridor and still maintain 100 feet of ROW to each side of the line.
- b. Yes. The 100 feet of ROW for each side of the line would not extend upon an adjacent property owner or outside the 1,000 foot corridor.

Response to Commission Staff's Third Request for Information Dated April 29, 2022

Case No. 2022-00066

Question No. 11

Responding Witness: Elizabeth J. McFarland

- Q-11. Provide the distance of the nearest residence from each of the proposed substations. Provide the estimated noise level from the substation at each of the nearest residences.
- A-11. The nearest residence to the Glendale South substation was measured at 452 feet using Google Earth imagery. The nearest residence to the Glendale Industrial substation was measured at 936 feet using Google Earth imagery.

Audible noise levels from substations are a product of the substation transformers. KU utilizes NEMA TR1 standards to specify maximum noise levels for substation transformers. The two power transformers that will be installed at Glendale South Substation are specified to produce at maximum, 70dB each. The six power transformers at Glendale Industrial Substation are specified to produce at maximum, 80 dB each. Sound is measured via IEEE standard that specifies measurements starting at 1 meter from the transformer. Sound waves dissipate as they travel farther from the source. Within the substation the sound levels will diminish to below conversational sound levels.