

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

May 2, 2022

IN THE MATTER OF:

THE 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

STEPHEN L. DOBSON, DEANNA D. DOBSON, BETTY J. DOBSON, RAYMOND E. DOBSON, LARRY L.  
HAGAN AND KAY HAGAN

DATA REQUESTS TO KENTUCKY UTILITIES COMPANY

## I. DEFINITIONS AND INSTRUCTIONS

1. With respect to each discovery request, all information is to be disclosed 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 Stephen L. Dobson, spokesperson for the owners filing jointly with interests in the Hagan property.
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, 3 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. 5

(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 “Eastern Route 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. DATA REQUESTS**

### **Question 1.**

Please specify the total load (annualized) KU will initially provide to the Ford facility upon the scheduled opening date.

**Response:**

### **Question 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?

**Response:**

### **Question 3.**

What will be the Ford facility’s load profile at maturity (peak capacity)?

**Response:**

### **Question 4.**

What percentage of KU’s Hardin County Kentucky load will the Ford facility consume initially?

**Response:**

**Question 5.**

What percentage of KU's Hardin County load will the Ford facility consume at maturity (peak load)?

**Response:**

**Question 6.**

What were the total number of alternate routes considered for the Eastern Route 345 kV transmission line?

**Response:**

**Question 7.**

What other routes were considered other the Eastern Route alternatives designated as Alternatives A, B & C ?

**Response:**

**Question 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?

**Response:**

**Question 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).

**Response:**

**Question 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?

**Response:**

**Question 11.**

What were the scoring differences between East routes A, B, & C? What were the cost differences between A,B & C?

**Response:**

**Question 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?

**Response:**

**Question 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.

**Response:**

**Question 14.**

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

**Response:**

**Question 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?

**Response:**

**Question 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?

**Question 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?

**Response:**

**Question 18.**

What is the total design/build cost per line mile for KU's proposed Eastern route 345 kV Line, alternative B?

**Response:**

**Question 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?

**Response:**

**Question 20.**

Does KU have knowledge of additional rights of way required and/or planned for solar farm interconnections?

**Response:**

**Question 21.**

What is KU's projected revenue (annualized) from the Ford plants?

**Response:**

**Question 22.**

What is the KU's projected revenue (annualized) to be generated from the solar farm if built on the Ford site?

**Response:**