

Kentucky Power Company
KPSC Case No. 2022-00236
Commission Staff's First Set of Data Requests
Dated September 22, 2022

DATA REQUEST

KPSC 1_1 Refer to the Application, page 1. Explain whether there is an active case in West Virginia before the West Virginia Public Service Commission regarding that portion of the Stone-Sprigg 46 kV line located in West Virginia. If so, provide a link to the case and a corresponding timeline for the case. If not, explain whether a case will or will not be opened, including a timeline for the case. If a case will not be opened, explain why not.

RESPONSE

No, there is not an active case before the West Virginia Public Service Commission regarding any portion of the Stone-Sprigg 46 kV Transmission Line to be retired. Although I am not an attorney, it is my understanding that the portion of the Belfry Area Transmission Line Project (Project) in West Virginia falls within the ordinary course of business and does not require approval from the West Virginia Public Service Commission to remove existing facilities.

Witness: Nicolas C. Koehler

Kentucky Power Company
KPSC Case No. 2022-00236
Commission Staff's First Set of Data Requests
Dated September 22, 2022

DATA REQUEST

KPSC 1_2 Refer to the Application, Exhibit 10 for Belfry Area Transmission Line Project, Section 4, page 5. Provide a copy of all landowner and stakeholder comments received and explain the extent to which specific actions were taken as a result.

RESPONSE

Please see the landowner comment cards and outreach tracker provided as KPCO_R_KPSC_1_2_Attachment1 which contains the landowner and stakeholder comments received and subsequent actions taken.

Witness: George T. Reese

AEP New Camp/Belfry (KY): Outreach and Stakeholder Feedback Tracking

DAY	DATE	TIME (ET)	TYPE Phone/Voice Mail Email/US Mail In Person/Virtual Incoming/Outgoing	CONTACT VEHICLE or LOCATION	FIRSTNAME	LASTNAME	LO ID	MAP	TEAM MEMBER	NOTES Feedback Comments Questions	FOLLOW UP/ACTION ITEMS
MON	8/16/2021		Phone	REDACTED	REDACTED	REDACTED	116	4,5	Vickie Stone, AEP ROW Jason Crum, Emerald Leah Jackson, GAI Bill Johnson, AEP	Concerns over the Belfry Substation REDACTED left a voice mail with Vickie Stone to express his concerns.	8/16/21: Vickie Stone forwarded information to J.Crum. J.Crum forwarded to L Jackson for follow up. 8/17/21: L Jackson contacted REDACTED. He owns the property across from the Library outside of Orinoco. He wants to put storage lockers on it and was concerned we might hold up that process. I told him he will be getting more information in the mail in the next couple weeks, but that as of right now it looked like one of our study segments skirted the edge of his property. He bought the property from Lauren Land Co a couple years ago, but our parcel data still has it under Lauren Land Co. We will change it in our parcel data. 8/24/21: B Johnson reports that the landowner's claims of ownership do not match Pike County parcel maps and that the LO has referred the project team to attorney, REDACTED. See additional correspondence w/ REDACTEDbelow
SUN	8/22/2021		Web Contact Form	REDACTED	REDACTED	REDACTED	178	3,4	Alyse Rooks, ERM	Concerned about what properties, if any, in Hurricane Branch, or Chapman Branch, are involved in this project, because We own acreage in both places. You can reach us at REDACTED. Appreciate any information. We are 80 & 82, so not too savvy with this computer, so would appreciate a phone call, or a map of the properties that are involved. Thanks.	9/14/21: A.Rooks forwarded to land and siting, requested summary of their follow up. 9/22/21 Update - ROW left messaged for the REDACTED.
TUES	8/24/2021		Web Contact Form	REDACTED	REDACTED	REDACTED	4	5	Alyse Rooks, ERM	Landowner listed on mailing list is REDACTED not REDACTED. Comments: I have a couple of questions. What would be the supporting structures for the following study segments(11,12,13,15 &16)? Some of the study segments appear to be redundant, for example 15 & 16 and 11&12. Will there be redundant lines, or will one or the other study segment move forward as the proposed route? There's currently a lot of unneeded 3 phase power structures in the Sharondale community along US 119, most prominent in and around the old Loftus Tipple area. Will these structures including the proposed retired structures be removed and remediated after the new upgrades are installed? REDACTED	9/14/21: A.Rooks forwarded to land and siting, requested summary of their follow up. 9/22/21 Update- J. Crum spoke to REDACTED. He is not affected. He has recently purchased the property from REDACTED. He has requested a packet that you sent to landowners of study segment 15. His property is next to a parcel affect by segment 15.
TUES	9/14/2021		Voicemail	REDACTED	REDACTED	REDACTED	25	4,5	Alyse Rooks, ERM	Touching base regarding the Belfry packet. Looking forward to hearing from you.	9/14/21: A.Rooks forwarded to land and siting, requested summary of their follow up. 9/22/21 Update - ROW left messaged for REDACTED.
WED	9/15/2021		Voicemail	REDACTED	REDACTED	REDACTED	238	1,2	Alyse Rooks, ERM	I manage a property on the route and we need to sit down and discuss this. Its looks like its coming right through the center of the property and I have timber.	9/17/21: A.Rooks forwarded to land and siting, requested summary of their follow up. 9/28/21 Update - ROW is in contact with REDACTED. An on-site meeting will be scheduled.
WED	9/15/2021		Voicemail (3)	REDACTED	REDACTED	REDACTED	5	5	Leah Jackson, GAI	His son is planning on building a house under where we are planning the line. He stated that his sons is ready to break ground very soon. (Email recaps saved in folder)	9/15/21: L Jackson talked with the landowner. Discussed the location of the son's future home in relation to the line. Also discussed a helipad that is in use on the property. Leah is unable to confirm the helipad through ususal sources for helipads/airports. Note potential issues with lighting/marker balls. 9/20/21: L Jackson spoke with REDACTED again. He wanted to let me know he is supposed to submit a down payment for his storage lockers this week, which he is "placing them 100-feet to the right of this fence line." I believe with our changes to the study segment, his storage lockers should be entirely outside of our ROW. Fred can you confirm that? He didn't mention his sons house this time, and I thought the house was going where the storage lockers are now supposed to be going. I asked him for a map but he said he couldn't get one together. Ultimately I would just like confirmation that we wont be impacting his parcel any longer so I/we can tell him that. It might be worth sending him a screenshot of the property lines we have just to confirm they are correct since the PVA is historically somewhat inaccurate. L Jackson asked J Crum (ROW) to contact REDACTED as he has compensation questions. 9/22/21: REDACTED contacted L Jackson again. L Jackson asked F Collard to confirm impacts to property. F Collard unable to confirm since several elements need to be clarified. Also mentioned that Distribution may need to cross property as well. L Jackson let the team know that REDACTED is moving forward with his plans for his property (additional follow up phone call). He indicated the team can discuss compensation with him down the road if there are future impacts. L Jackson asked J Crum to give the LO a call to establish contact w/ ROW and indicated that the LO has been very nice and cooperative so far.
MON	9/20/2021		Email (2)	REDACTED	REDACTED	REDACTED	79	2,3	Alyse Rooks, ERM	I have concerns about the need for this project, what it will cost ratepayers, the decision by AEP to not utilize existing right of way, the proposed location of the new right of way running directly through a residential area and the resulting diminution in property value that will be incurred by residents living near the new right of way. (NOTE: REDACTED asked the same questions on the virtual town hall)	9/20/21: REDACTED sent multiple e-comments in on the same day. 10/12/21: A.Rooks forwarded to land and siting, requested summary of their follow up.

AEP New Camp/Belfry (KY): Outreach and Stakeholder Feedback Tracking

DAY	DATE	TIME (ET)	TYPE Phone/Voice Mail Email/US Mail In Person/Virtual Incoming/Outgoing	CONTACT VEHICLE or LOCATION	FIRSTNAME	LASTNAME	LO ID	MAP	TEAM MEMBER	NOTES Feedback Comments Questions	FOLLOW UP/ACTION ITEMS
TUES	9/21/2021		Comment Card	REDACTED	REDACTED	REDACTED	52	6	Alyse Rooks, ERM	REDACTED No comments included	
TUES	9/21/2021		Comment Card	REDACTED	REDACTED	REDACTED	120	4	Alyse Rooks, ERM	REDACTED No comments included	
TUES	9/21/2021		Comment Card	REDACTED	REDACTED	REDACTED	78	1	Alyse Rooks, ERM	The property was previously owned by REDACTED and REDACTED. REDACTED and REDACTED now own both 335 and 337. The 337 property is occupied by our daughter REDACTED. (AR note -- Per the stakeholder list the REDACTED are listed as ID # 78. Property IDs for Belfry Project only go to #245)	10/12/21: A.Rooks forwarded to land and siting, requested summary of their follow up.
MON	9/27/2021		Voicemail (3)	REDACTED	REDACTED	REDACTED	200	4	Alyse Rooks, ERM	If someone could please give me a call back. I have questions about the Belfry Area, New Camp project.	9/28/21- A.Rooks spoke to REDACTED as his property abuts the line but is not crossed. He asked about compensation, I told his there was not any to be offered but if anything changed the route changed or his property was needed for access or surveying our ROW team would reach out directly. He and his brother own 60 acres in the area, we checked while on the call and his brother is not listed on our stakeholder list. 10/12/21: A.Rooks forwarded to land and siting, requested summary of their follow up.
TUES	10/5/2021		Comment Card	REDACTED	REDACTED	REDACTED	25	4,5	Alyse Rooks, ERM	There is someone buired on the property. There is a gas line on the property. How will this affect my property. Could someone contact me please about my questions.	
TUES	10/5/2021		Comment Card	REDACTED	REDACTED	REDACTED	143	4	Alyse Rooks, ERM	We need a pole replaced at the end of REDACTED. The pole is leaning and we could have an accident. It might fall on road to hurt someone. P.S. We also need some trees cut off of lines. Thank you.	10/12/21: A.Rooks forwarded to land and siting, requested summary of their follow up.
TUES	10/5/2021		Comment Card	REDACTED	REDACTED	REDACTED	189	3,4	Alyse Rooks, ERM	REDACTED At REDACTED., a cemetary is located at the beginning of this property on the right side. This is not affected by your routes. However Route #05 crosses a coal slog dump that is leased to KY2energy. This lease expires on 2/27/24. I am not sure if it would be a problem for you or not. Thanks.	10/12/21: A.Rooks forwarded to land and siting, requested summary of their follow up.
THU	10/7/2021		Voicemail	REDACTED	REDACTED	REDACTED	189	3,4	Alyse Rooks, ERM	Please give me a call back, would like to discuss the Belfry project.	10/12/21: A.Rooks forwarded to land and siting, requested summary of their follow up.
THU	10/7/2021		Voicemail	REDACTED	REDACTED	REDACTED	184	5	Alyse Rooks, ERM	Need to talk about the Belfry project. Would appreciate it very much if you could call me back.	10/12/21: A.Rooks forwarded to land and siting, requested summary of their follow up.
MON	6/27/2022		Voicemail	REDACTED	REDACTED	REDACTED	92	2	McKenzy Moreno, ERM	Her son, REDACTED, is the one who is reaching out to us. "I'm REDACTED. I'm calling for my mother, REDACTED. She lives at REDACTED. I'm calling about the Belfry Area Transmission Line Project. They sent us a map and a letter but the map was such a poor scale. It shows the line and four fields of the general area. We'd like to know who's property that line is proposed to go over for the Belfry to New Camp substation. REDACTED. Thanks."	6/28/2022: MM forwarded to siting/ROW to follow up 6/28-2022: ROW called REDACTED to setup an in-person meeting for 7/14/2022 with him and his mother. 7/14/2022: ROW met with REDACTED & REDACTED at REDACTED residents REDACTED. He explained the project and the need to do some survey work on the property. REDACTED agreed grant permission and signed the PTS document
TUES	6/28/2022		Voicemail	REDACTED	REDACTED	REDACTED	92	2	McKenzy Moreno, ERM	"Hi Cortney, this is REDACTED. I'm calling for my mother REDACTED, in regards to the Belfry Area Transmission Line Project. You sent her a letter and a little map. From the map we can't tell if it's going over the top of her property, to the left or right of her property. We'd like to know the answer to that. If you could give me a call, REDACTED Thank you."	
WED	6/29/2022		Voicemail	REDACTED	REDACTED	REDACTED	204	5	McKenzy Moreno, ERM	"My name is REDACTED and I received several letters for the properties that I own. ___ REDACTED. I'd like to ask somebody about that. My phone number is REDACTED. Like I said, my last name is REDACTED. Thank you, bye-bye."	6/29/2022: MM forwarded to siting/ROW to follow up 6/29/2022: ROW called REDACTED to answer any questions he may have. REDACTED explained where his property is located, ROW confirmed with the project map and made him aware that this project would not be affecting his property. REDACTED was content and stated that if anything changes, please let him know.
WED	6/29/2022		Voicemail	REDACTED	REDACTED	REDACTED	204	5	McKenzy Moreno, ERM	"My name is REDACTED and my phone number is REDACTED. I'm calling about your Right-of-Way on your land for the power lines you are putting through the Hardy/Belfry area. I'm a property owner and I've received three letters on it and do not live there. I'd appreciate if you could give me a call back about it. Thank you, bye."	
MON	8/29/2022		Phone	REDACTED	REDACTED	REDACTED	238	1 and 2	McKenzy Moreno, ERM	REDACTED called and explained that she had received a mailing informing her of a finalized route. REDACTED does not want this line to impact the property and explained that AEP needed to work with her. REDACTED stated that the property was for sale if AEP want to utilize it.	8/29/2022: ROW explained that it would inform the project team of her concerns.
WED	8/31/2022		Voicemail	REDACTED	REDACTED	REDACTED	184 and 107	5 and 2	McKenzy Moreno, ERM	REDACTED called four times and requested someone follow up. His property is in the area.	9/1/22: MM forwarded to ROW to follow up
WED	8/31/2022		Voicemail	REDACTED	REDACTED	REDACTED	184 and 107	5 and 2	McKenzy Moreno, ERM	See above	8/2022: While in the area, ROW talked to REDACTED, REDACTED stated that REDACTED is his uncle was possibly in the early stages of Alzheimer's. He recommended that I talk to his son REDACTED.
WED	8/31/2022		Voicemail	REDACTED	REDACTED	REDACTED	184 and 107	5 and 2	McKenzy Moreno, ERM	See above	8/2022: ROW called REDACTED and explained the project, REDACTED stated he was an attorney and was dealing with trespassers on the property currently. REDACTED ask to not have anyone on the property
WED	8/31/2022		Voicemail	REDACTED	REDACTED	REDACTED	184 and 107	5 and 2	McKenzy Moreno, ERM	See above	

AEP New Camp/Belfry (KY): Outreach and Stakeholder Feedback Tracking

DAY	DATE	TIME (ET)	TYPE Phone/Voice Mail Email/US Mail In Person/Virtual Incoming/Outgoing	CONTACT VEHICLE or LOCATION	FIRSTNAME	LASTNAME	LO ID	MAP	TEAM MEMBER	NOTES Feedback Comments Questions	FOLLOW UP/ACTION ITEMS	
TUES	9/20/2022		Voicemail	REDACTED	REDACTED	REDACTED		238	1 and 2	McKenzy Moreno, ERM	<p>9/26/2022: MM forwarded to ROW to follow up; Katie Glass to follow up w/ attorney for property owner pending protocol confirmation w/ Hector Garcia-Santana.</p> <p>9/28/2022: Katie Glass followed up but number was for landowner. Topics discussed included: "- This property is PSC Filing ID number 2 on our map filed with the application</p> <ul style="list-style-type: none"> - The property is about 600 surface acres and is where the New Camp Substation is currently situated - REDACTED handled the negotiations when the Company acquired the property for the New Camp Substation - The property is owned by 20 different individual owners, but REDACTED acts as their representative and says she has POA from each owner - She says the property is currently listed for sale and is a "residential" area - Her issue appears to be exclusively with the location of the proposed line, which cuts through the middle of the property. Her concern is that no one will buy the property with the transmission line running through the middle - She says if the location of the line is not moved then she will refuse to negotiate at the easement acquisition phase of the project, forcing the Company to file an eminent domain action. In her words, the Company can either agree to move the line, buy the property outright, or go through an eminent domain proceeding at substantial cost to the Company. <p>Katie Glass explained that the PSC proceeding was not the appropriate forum to address the proposed location of the line and that rather the PSC proceeding was to determine the need for the line and whether it would result in wasteful duplication. Nonetheless, Katie Glass explained she would pass along her concerns.</p> <p>9/29/2022: ROW called REDACTED (Representing REDACTED), REDACTED) had some questions about the project. ROW explained AEP's plan for upgrading the power grid in the area, and the impacts on the REDACTED). ROW also explained why AEP could not utilize REDACTED preferred route due to constructability issues, avoiding oil/gas facilities, and AEP's proposed route is less of an impact footprint on the entire community. REDACTED questioned the right of way and/or easements relied upon by AEP, ROW explained that this project would be a greenfield project and require a new Easement/ROW. ROW will be sending REDACTED a template easement and PDF maps for his review.</p> <p>9/29/2022: ROW called REDACTED informing her of my conversation with REDACTED. ROW explained that ROW was emailing REDACTED some material within the next few weeks and that ROW would include her on the email. She was traveling and dropped the call, so I never got a reaction from REDACTED.</p> <p>9/29/2022: ROW called REDACTED with no answer, message was left.</p>	
TUES	9/20/2022		Email	REDACTED	REDACTED	REDACTED		238	1 and 2	McKenzy Moreno, ERM	<p>REDACTED, a lawyer located in Huntington, WV, emailed Cortney M. on behalf of REDACTED and the REDACTED. Full email included: Good morning, my name is REDACTED and I'm an attorney at REDACTED, in Huntington, WV. I'm reaching out to discuss the interests of my client, REDACTED with respect to the Belfry KY Area Transmission Line Construction Project. Please let me know when you would be available for a call.</p> <p>Thanks, REDACTED</p>	9/29/22: Cortney responded and let him know that ROW would reach out. Please see line 26 for the full outreach summary
WED	9/28/2022		Email	REDACTED	REDACTED	REDACTED		238	1 and 2	McKenzy Moreno, ERM	<p>REDACTED, a lawyer located in Huntington, WV, emailed Cortney M. on behalf of REDACTED and the REDACTED. Full email included: Good afternoon Cortney, I'm following up on the below email to discuss the interests of my client, REDACTED, with respect to the Belfry KY Area Transmission Line Construction Project. In particular, I would like to discuss the impact which this project will have on my client's property, and to gain an understanding of the right of way and/or easements relied upon by AEP. Please let me know when you would be available for a call.</p> <p>Thanks, REDACTED</p>	
WED	9/28/2022		Voicemail	REDACTED	REDACTED	REDACTED		238	1 and 2	McKenzy Moreno, ERM	<p>REDACTED, a lawyer located in Huntington, WV, called on behalf of REDACTED and the REDACTED.</p>	9/29/2022: Forwarded to ROW to follow up. Please see line 26 for the full outreach summary
Other Stakeholders												
WED	7/7/2021	4-00pm	Virtual Outgoing	WebEX	REDACTED	REDACTED	Deputy Judge Executive Grants Administrator	Pike County	Bob Shurtleff Cortney Mustard Chintan Raval Emily Larson Lance Blackburn Fred Collard James Cochran Leah Jackson Logan McKinney Steve Easterling Jason Crum Nancy Miller	<p>Project team presented a slide deck outlining the project need and background as well as the overall schedule. The county staff had very few questions about the project and were supportive of the effort the team made to share information with them.</p>	<p>Bob will share the project map and slide deck with Belfry Area commissioner at the next meeting.</p> <p>Project team will keep the County in the loop as we work through the outreach process and into the future.</p>	

QUESTIONS OR COMMENTS?

**PLEASE FILL OUT THIS PANEL, TEAR IT OFF
AND MAIL IT BACK TO US**

Please provide your name and contact information to ensure our records are up to date.

NAME:

[REDACTED]

EMAIL:

[REDACTED]

PHONE:

5 [REDACTED]

Please provide feedback about your property after you review the project details and the study segments under consideration to rebuild the power line. Detailed maps of study segments are available at KentuckyPower.com/Belfry.

Feedback example: "There is a family cemetery located along the rebuild section approximately 100 feet west of 345 Broad Street."

There is someone
Buried on the Property
There is a GAS Line
on the Property

How will this Affect
my Property could
some one Contact
me Please about
my questions.

NOTE: IF YOU WOULD PREFER TO SUBMIT YOUR COMMENTS ONLINE, HOVER OVER THIS QR CODE WITH YOUR SMARTPHONE CAMERA AND CLICK ON THE WEBPAGE THAT APPEARS.



QUESTIONS OR COMMENTS?

PLEASE FILL OUT THIS PANEL, TEAR IT OFF
AND MAIL IT BACK TO US

Please provide your name and contact information to ensure
our records are up to date.

NAME: [REDACTED]

EMAIL: [REDACTED]

PHONE: [REDACTED]

Please provide feedback about your property after you review
the project details and the study segments under consideration
to rebuild the power line. Detailed maps of study segments are
available at [KentuckyPower.com/Belfry](https://www.kentuckypower.com/Belfry).

Feedback example: "There is a family cemetery located along
the rebuild section approximately 100 feet west of 345 Broad
Street."

We need a pole replaced
at the end of Church
House Hollow, ~~Rt 4~~
Belfry, Ky. 41514.
The pole is leaning,
& we could have a
accident. It might
fall on road & hurt
someone,
P.S. We also need some trees
cut off of lines

Thank You,
[REDACTED]

NOTE: IF YOU WOULD PREFER TO SUBMIT
YOUR COMMENTS ONLINE, HOVER OVER
THIS QR CODE WITH YOUR SMARTPHONE
CAMERA AND CLICK ON THE WEBPAGE
THAT APPEARS.



BELFRY AREA

TRANSMISSION LINE PROJECT



FOLLOW-UP QUESTIONS AND COMMENTS

Please fill out and mail this comment card using the enclosed self-addressed, stamped envelope by Thursday, September 23rd. If you prefer to provide comments online, visit KentuckyPower.com/Belfry and click the "Contact Us" button.

Please provide your name and contact information below to ensure we have the most up-to-date information for our records.

NAME:

ADDRESS:

EMAIL:

Please complete this questionnaire after you have reviewed the information provided about this project.

Did you find the content provided to be informative? Yes No

If no, please explain

Additional Comments

Providing specific locational information in regard to your concerns can help us determine our proposed power line route
Example: "Study Segment 3 is on the west side of my property at 123 Main Street, and there is an existing gas line running parallel to this study segment," and "There is a family cemetery located along the rebuild section approximately 100 feet west of 345 Broad Street."

At 0 Cow Branch Rd., a cemetery is located at the beginning of this property on the right side. This is not affected by your routes. However, Route #05 crosses a coal slag dump that is leased to [REDACTED]. This lease expires on 2/27/24. I am not sure if this would be a problem for you or not. Thanks



BOUNDLESS ENERGY

BELFRY AREA TRANSMISSION LINE PROJECT



FOLLOW-UP QUESTIONS AND COMMENTS

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Please provide your name and contact information below to ensure we have the most up-to-date information for our records.

NAME:

ADDRESS:

EMAIL:

Please complete this questionnaire after you have reviewed the information provided about this project.

Did you find the content provided to be informative? Yes No

If no, please explain

Additional Comments

Providing specific locational information in regard to your concerns can help us determine our proposed power line route
Example: "Study Segment 3 is on the west side of my property at 123 Main Street, and there is an existing gas line running parallel to this study segment," and "There is a family cemetery located along the rebuild section approximately 100 feet west of 345 Broad Street."



BELFRY AREA

TRANSMISSION LINE PROJECT



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Please provide your name and contact information below to ensure we have the most up-to-date information for our records.

NAME:

ADDRESS:

EMAIL:

Please complete this questionnaire after you have reviewed the information provided about this project.

Did you find the content provided to be informative? Yes No

If no, please explain

Additional Comments

Providing specific locational information in regard to your concerns can help us determine our proposed power line route
Example: "Study Segment 3 is on the west side of my property at 123 Main Street, and there is an existing gas line running parallel to this study segment," and "There is a family cemetery located along the rebuild section approximately 100 feet west of 345 Broad Street."

This property was previously owned by

[REDACTED] now own both
335 and 337. The 337 property is occupied by
our daughter, [REDACTED]



BOUNDLESS ENERGY

BELFRY AREA

TRANSMISSION LINE PROJECT



FOLLOW-UP QUESTIONS AND COMMENTS

Please fill out and mail this comment card using the enclosed self-addressed, stamped envelope by Thursday, September 23rd. If you prefer to provide comments online, visit KentuckyPower.com/Belfry and click the "Contact Us" button.

Please provide your name and contact information below to ensure we have the most up-to-date information for our records.

NAME: _____
ADDRESS: _____
EMAIL: _____

Please complete this questionnaire after you have reviewed the information provided about this project.

Did you find the content provided to be informative? Yes No

Kentucky Power Company
KPSC Case No. 2022-00236
Commission Staff's First Set of Data Requests
Dated September 22, 2022

DATA REQUEST

- KPSC 1_3** Refer to Exhibit 10. Section 4.0 “Alternate Route Comparison” discusses a specific landowner in the vicinity of New Camp Substation whose property cannot be avoided.
- a. If not provided above, provide a copy of the landowner’s comments, or if not written, provide a summary of any verbal comments. Explain Kentucky Power’s continuing efforts to accommodate (if possible) the landowner’s concerns.
 - b. If provided above, identify the comments received from this particular landowner and provide an update on the efforts to accommodate the landowner’s concerns.

RESPONSE

Please refer to KPCO_R_KPSC_1_3_Attachment1 for a summary of the interactions between the landowner and the Company’s right-of-way agent. The communications have focused on the fact that exiting the New Camp Substation without crossing the landowner in question is not possible because the subject parcel surrounds the existing substation site. The landowner has requested that the right-of-way (ROW) for the final Proposed Route be located as far east on the property as possible. Preliminary engineering indicates that in practice the line cannot be moved to the east because it would require a crossing of New Camp Road which is heavily congested with residential development and would require the removal of houses. Additionally, gas infrastructure is already located along the ridgetop in the optimal location for infrastructure making transmission structure placement difficult. Moving the line to the western property boundary would require approximately 1.7 additional miles of transmission line over difficult terrain as well as at least four additional heavy line angles.

Witness: George T. Reese

[REDACTED]
155-00-00-049.00
[REDACTED]

Correspondence

- **9.27.2021**
Called [REDACTED] and explained AEP's project in the area and set up an in-person meeting
- **10.14.2021**
Met with [REDACTED] at Starbucks on 3rd Ave in Huntington, WV. I explained AEP's plans of a site visit in the Belfry area. [REDACTED] was almost demanding wanting to know how much AEP was going to pay for a ROW on the property. [REDACTED] explained that AEP just finished up acquiring land from her (New Camp Station), [REDACTED] stated this acquisition would cost lots more. I explained that this project was very preliminary and without surveying and testing, I could not give a monetary amount. I proceeded to ask for permission to enter the Property that she manages. [REDACTED] gave verbal permission to access the property. [REDACTED] stated that she would recommend AEP stay as far east on the property as possible with any type of ROW activity. [REDACTED] also mentions several access roads on her property that AEP could utilize if necessary.
- **3.16.2022**
I called [REDACTED] to inform her that after consideration, site visits, and review AEP would be unable to stay to the east side of the property. I explained due to the oil/gas related facilities in that area, and it was not economical to use her requested route. She disagreed and stated she did not want the T-line on the property.
- **8.29.2022**
[REDACTED] called and explained that she had received a mailing informing her of a finalized route. [REDACTED] does not want this line to impact the property and explained that AEP needed to work with her. [REDACTED] stated that the property was for sale if AEP want to utilize it. I explained that I would inform the project team of her concerns.
- **9.29.2022**
Called [REDACTED] (Representing [REDACTED]), [REDACTED] had some questions about the project. I explained AEP's plan for upgrading the power grid in the area, and the impacts on the [REDACTED] -Est property. I also explained why AEP could not utilize [REDACTED] preferred route due to constructability issues, avoiding oil/gas facilities, and AEP's proposed route is less of and impact footprint on the entire community. [REDACTED] questioned the right of way and/or easements relied upon by AEP, I explained that this project would be a greenfield project and require a new Easement/ROW. I will be sending [REDACTED] a template easement and PDF maps for his review.

- **9.29.2022**
Called [REDACTED] informing her of my conversation with [REDACTED]. I explained that I was emailing [REDACTED] some material within the next few weeks and that I would include her on the email.
She was traveling and dropped the call, so I never got a reaction from [REDACTED].
- 9.29.2022
Call [REDACTED] with no answer, message was left.

Estimated Property Disturbance (without survey)

- **Proposed Structures on Property**
1,2,3,4,5,6,7,8
- **Proposed ROW**
13.77 Acres
- **Proposed Access Road**
7.02 Acres

Kentucky Power Company
KPSC Case No. 2022-00236
Commission Staff's First Set of Data Requests
Dated September 22, 2022

DATA REQUEST

KPSC 1_4 Refer to the Application, Exhibit 10, Attachment C, Map 3 Alternative Routes, page 47 of 92; and Attachment H, Sheet 9 of 12, page 89. Map 3 shows a cemetery very close to the line entering the proposed Orinoco substation from the north. Confirm that the map on Sheet 9 of 12 and Map 3 depict the same cemetery location.

RESPONSE

Both of these maps depict the same cemetery, which was identified from GIS databases. The apparent proximity to the Proposed Route on Map 3 is a result of the difference in symbology size and scale between the maps.

Witness: George T. Reese

Kentucky Power Company
KPSC Case No. 2022-00236
Commission Staff's First Set of Data Requests
Dated September 22, 2022

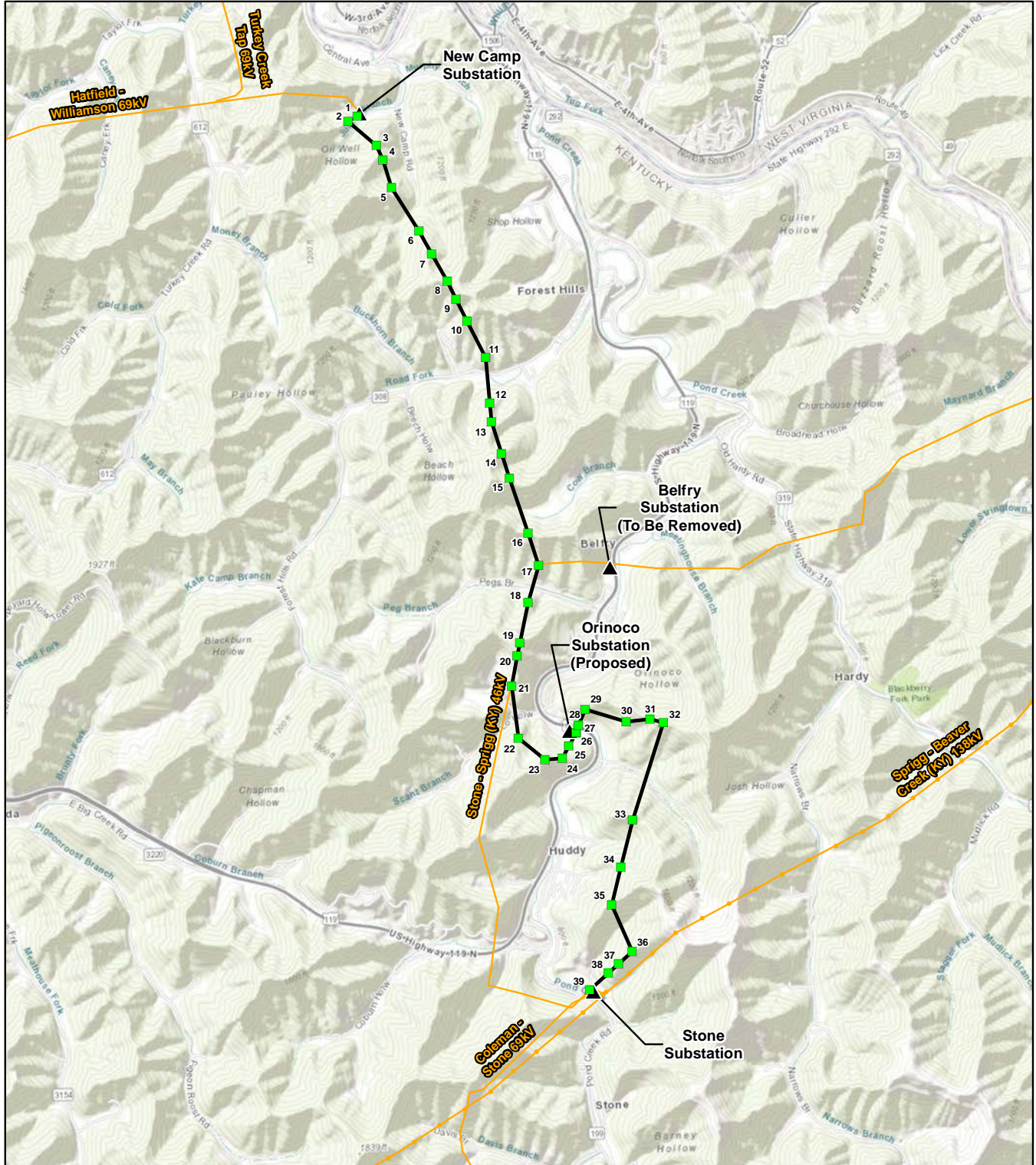
DATA REQUEST

KPSC 1_5 Refer to the Application, Exhibit 10, Attachment C, Map 4, page 48 of 92 and Attachment H, pages 81–92. Provide an update to the maps showing the placement of towers along the proposed route and the areas where Kentucky Power believes that it may be necessary to move the centerline 200 feet in any direction in order to avoid an obstacle.

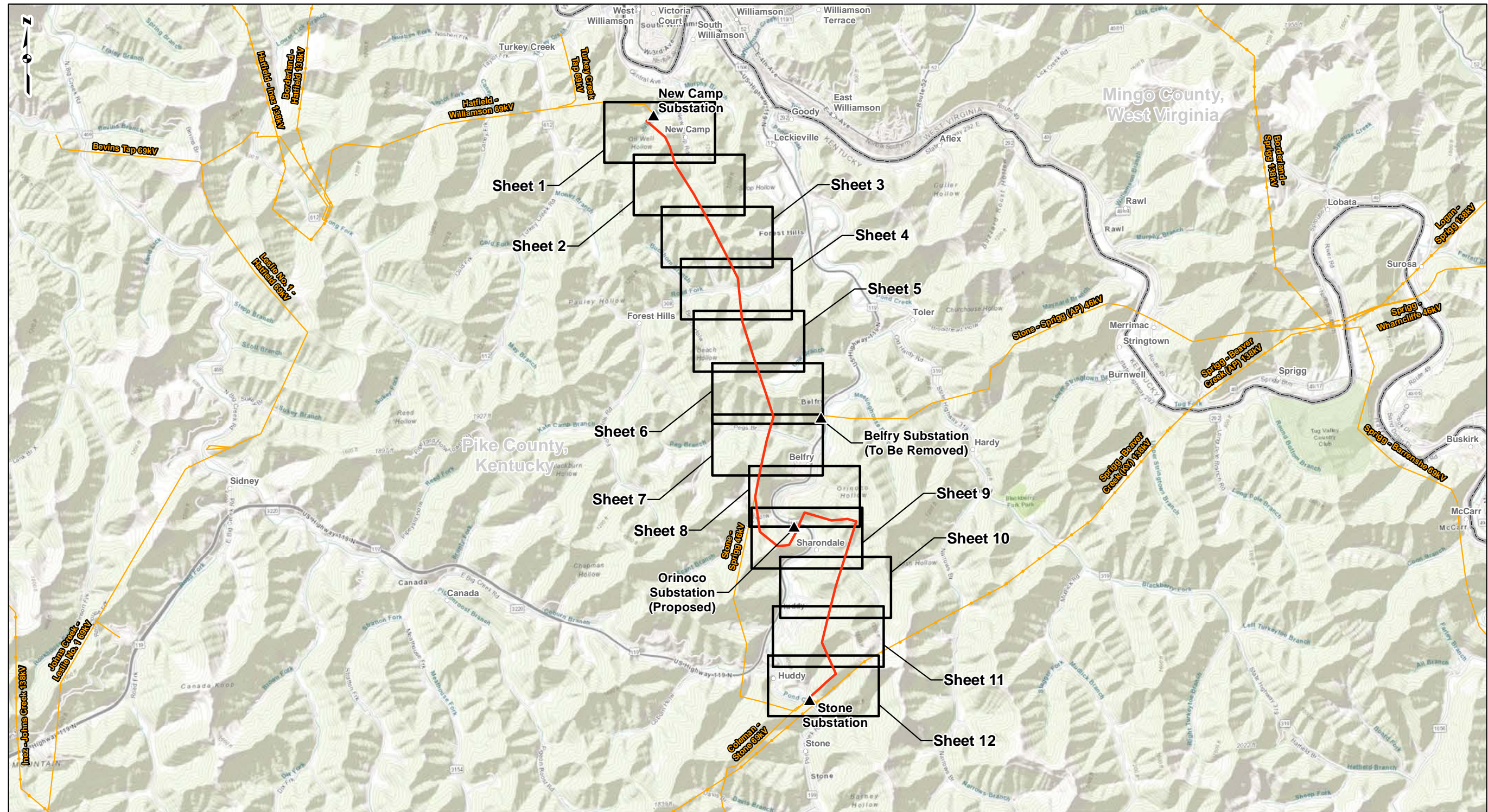
RESPONSE

Please see KPCO_R_KPSC_1_5_Attachment1 for a map showing preliminary structure placement. At this time, specific areas of concern, that may require the centerline to move, are unknown. Environmental, cultural resource, and geotechnical surveys have not been completed and survey findings may impact final structure locations. Further, the 200 feet from either side of the centerline allows flexibility in final structure spotting to work with individual landowners through easement negotiations. These surveys and conversations will be continually ongoing until final engineering design is complete.

Witness: George T. Reese



<p>Legend</p> <ul style="list-style-type: none"> ▲ Substation ■ Proposed Structure — Proposed Route — Existing 69kV Transmission Line — Existing 138kV Transmission Line 	<p>Sources: ESRI (2022), AEP (2019)</p>		<p align="center">Map 4 Proposed Route</p> <p align="right">Belfry Area Improvements Project</p> <p align="center"> <small>© 2022 KY Power</small> <small>ROUNDNESS ENERGY</small> </p> <p align="center"> 0 4,000 Feet </p>
<p>NAD 1983 State Plane Kentucky South Feet</p> <p align="center"> </p>			
<p align="center">September 28, 2022</p>			



REFERENCE: WORLD TOPOGRAPHIC, ESRI, ARCGIS ONLINE, ACCESSED 09/2022.

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LEGEND

- ▲ Substation
- Proposed Route*
- Sheet Index
- Existing 69kV or Lower Transmission Line
- Existing 138kV Transmission Line

0 2,000 4,000 8,000 Feet

DETAILED MAPBOOK SHEET INDEX

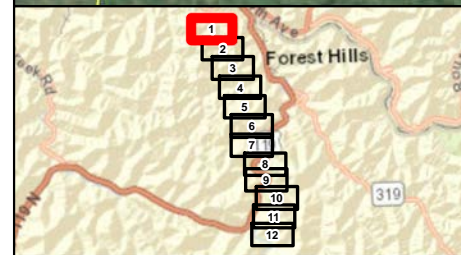
Belfry Area Improvements Project
 American Electric Power

gal consultants KENTUCKY POWER BUSINESS ENERGY

DRAWN BY: EFJ DATE: 9/28/2022
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SHEET 1
 SHEET 2



REFERENCES: WORLD IMAGERY, MAXAR (2021), ESRI, ARCGIS ONLINE, ACCESSED 09/2022, WORLD TRANSPORTATION, ESRI, ARCGIS ONLINE, ACCESSED 09/2022, NATIONAL HYDROGRAPHY DATASET (NHD) STREAMS, USGS, 2020, NATIONAL WETLAND INVENTORY (NWI) WETLANDS, USFWS, 2020, 100-YEAR FLOODPLAINS, FEDERAL EMERGENCY MANAGEMENT AGENCY (FEMA), 2020, CEMETERIES, CHURCHES, SCHOOLS, ESRI, ARCGIS ONLINE, 2021.


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□ Proposed Structure*	Existing 138kV Transmission Line	⛪ Church
— Proposed Route*	†† Cemetery	— NHD Stream
- - - Proposed 100-Foot ROW*		■ NWI Wetland
▭ Parcel Boundary**		■ 100-Year Floodplain

0 150 300 600 Feet

**DETAILED MAPBOOK
SHEET 1 OF 12**

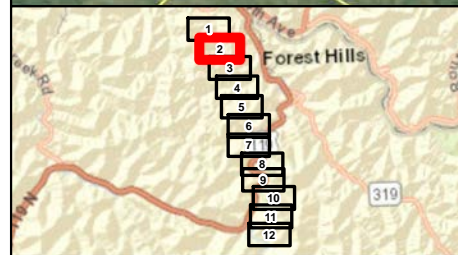


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— Proposed Route*	†† Cemetery	🌊 NHD Stream
- - - Proposed 100-Foot ROW*		🟢 NWI Wetland
▭ Parcel Boundary**		🟡 100-Year Floodplain

0 150 300 600 Feet

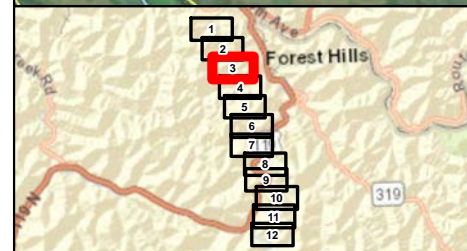
**DETAILED MAPBOOK
SHEET 2 OF 12**

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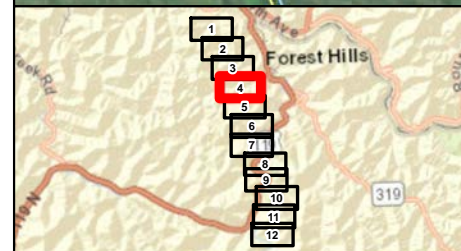
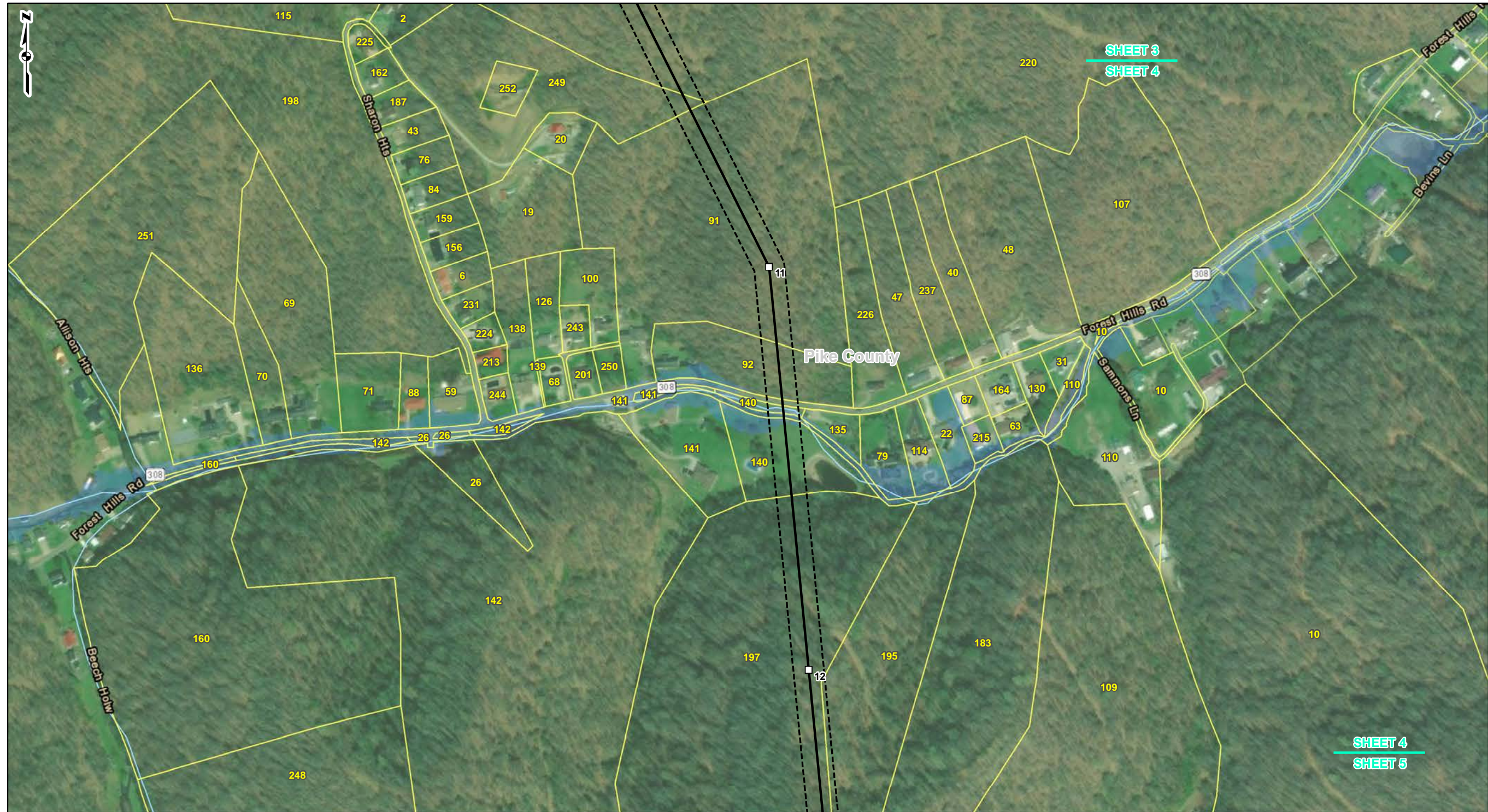
LEGEND

Substation	Existing 69kV or Lower Transmission Line	School
Proposed Structure*	Existing 138kV Transmission Line	Church
Proposed Route*	Cemetery	NHD Stream
Proposed 100-Foot ROW*		NWI Wetland
Parcel Boundary**		100-Year Floodplain

0 150 300 600 Feet

**DETAILED MAPBOOK
SHEET 3 OF 12**

	Belfry Area Improvements Project American Electric Power	
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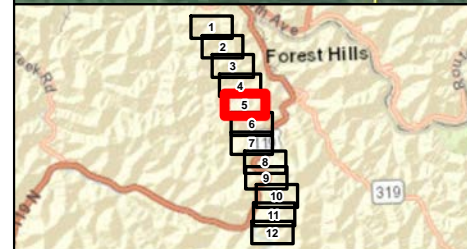
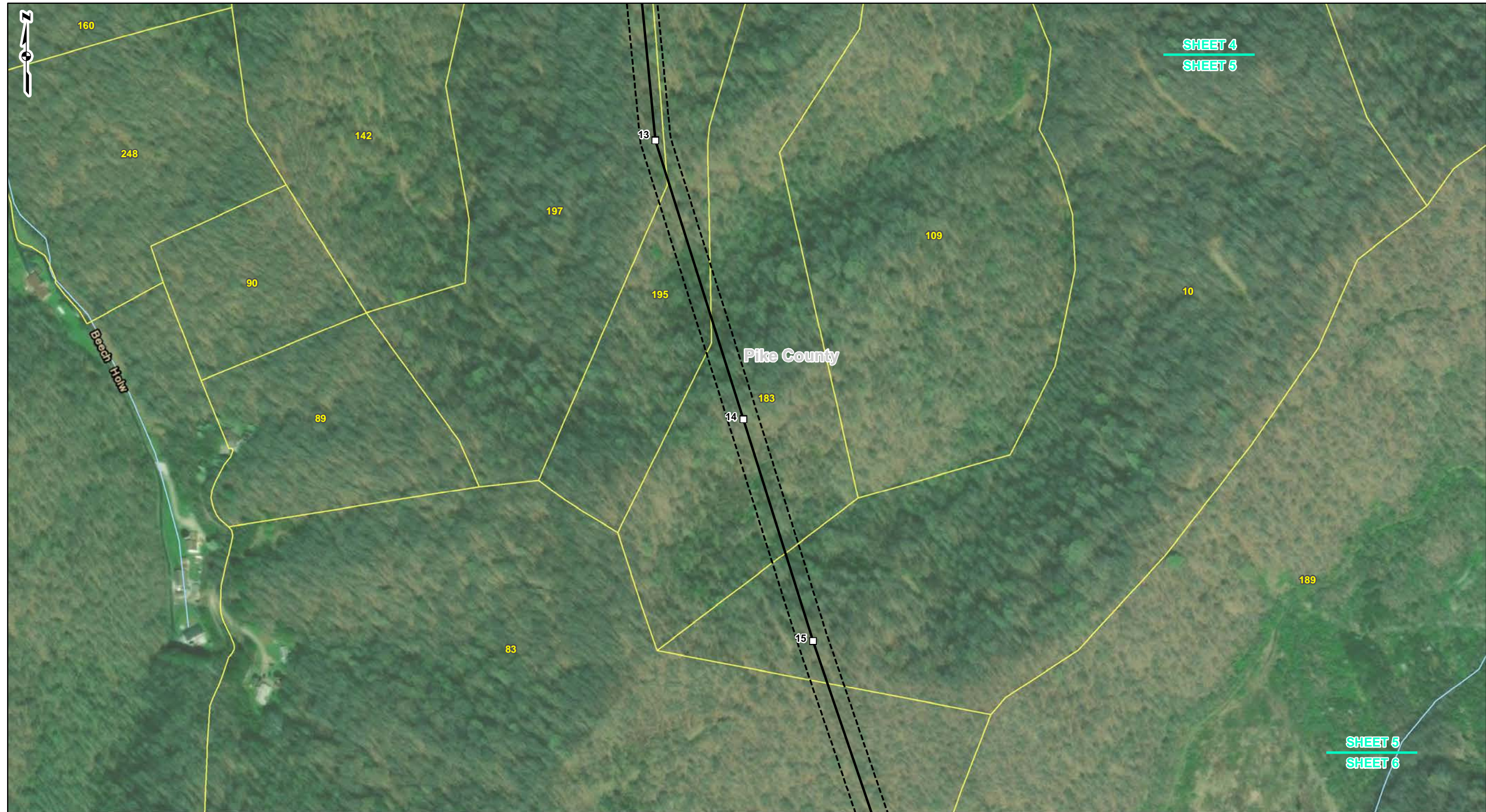
Substation	Existing 69kV or Lower Transmission Line	Church
Proposed Structure*	Existing 138kV Transmission Line	NHD Stream
Proposed Route*	Cemetery	NWI Wetland
Proposed 100-Foot ROW*		100-Year Floodplain
Parcel Boundary**		

0 150 300 600 Feet

**DETAILED MAPBOOK
SHEET 4 OF 12**

Belfry Area
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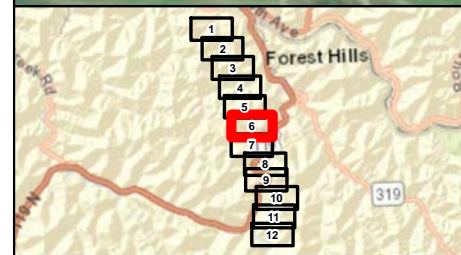
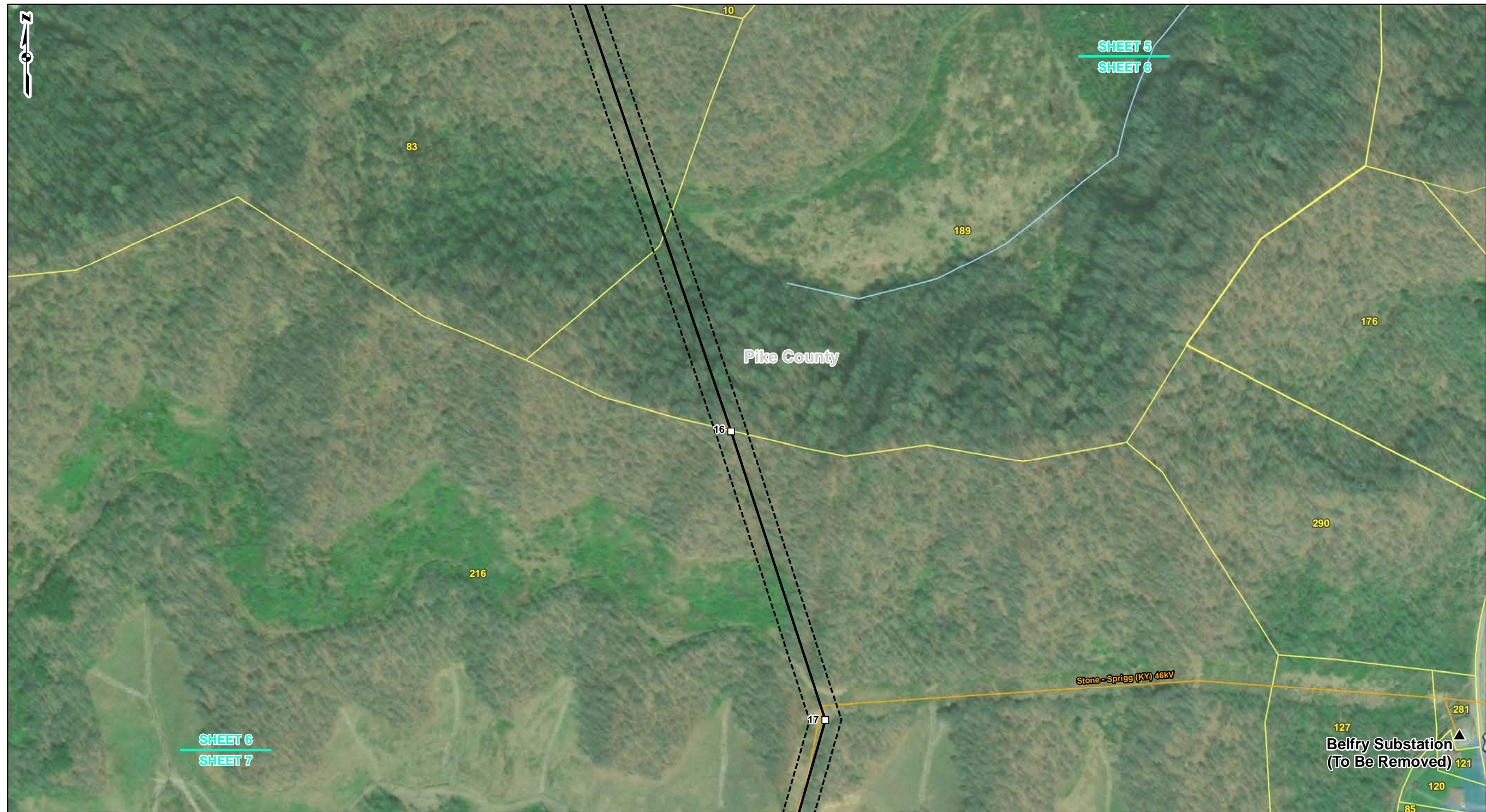
LEGEND

Substation	Existing 69kV or Lower Transmission Line	School
Proposed Structure*	Existing 138kV Transmission Line	Church
Proposed Route*	Cemetery	NHD Stream
Proposed 100-Foot ROW*		NWI Wetland
Parcel Boundary**		100-Year Floodplain

0 150 300 600 Feet

**DETAILED MAPBOOK
SHEET 5 OF 12**

	Belfry Area Improvements Project American Electric Power	
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LEGEND

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Proposed Structure*	Existing 138kV Transmission Line	NHD Stream
Proposed Route*	Cemetery	NWI Wetland
Proposed 100-Foot ROW*		100-Year Floodplain
Parcel Boundary**		

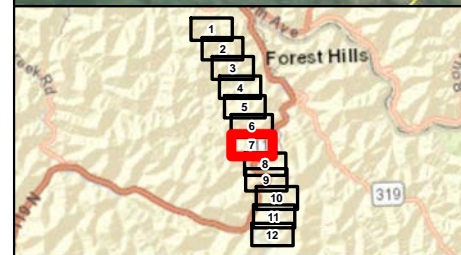
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**DETAILED MAPBOOK
SHEET 6 OF 12**

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— Proposed Route*	†† Cemetery	— NHD Stream
- - - Proposed 100-Foot ROW*		■ NWI Wetland
▭ Parcel Boundary**		■ 100-Year Floodplain

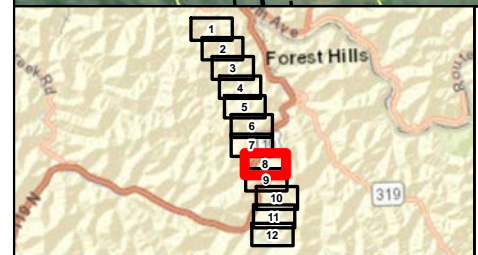
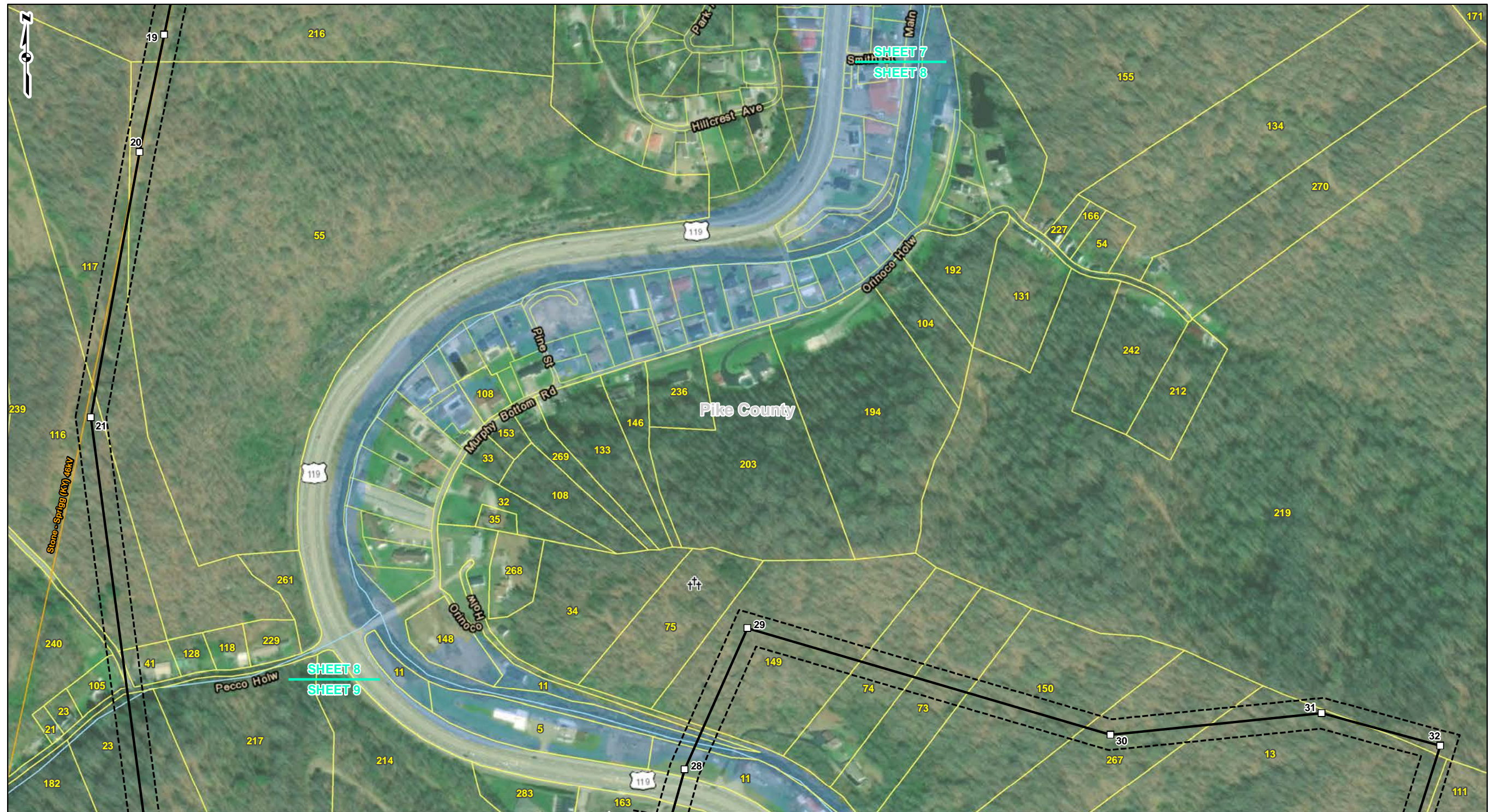
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DETAILED MAPBOOK SHEET 7 OF 12

Belfry Area Improvements Project
 American Electric Power

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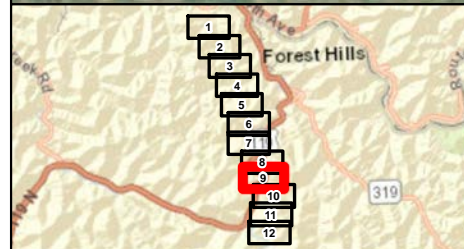
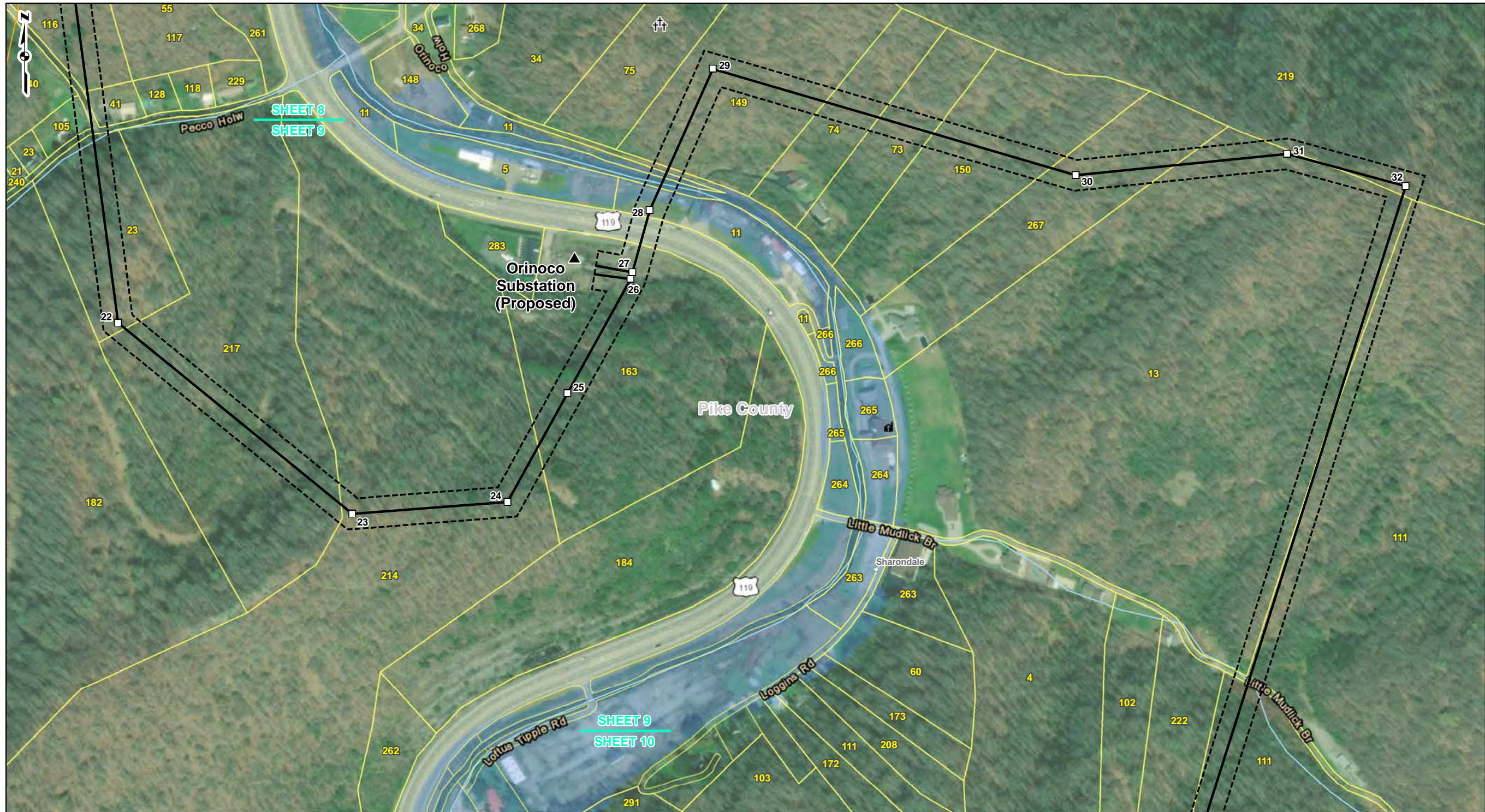
Substation	Existing 69kV or Lower Transmission Line	School
Proposed Structure*	Existing 138kV Transmission Line	Church
Proposed Route*	Cemetery	NHD Stream
Proposed 100-Foot ROW*	Parcel Boundary**	NWI Wetland
		100-Year Floodplain

0 150 300 600 Feet

DETAILED MAPBOOK SHEET 8 OF 12

Belfry Area Improvements Project
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▭ Parcel Boundary**		■ 100-Year Floodplain

0 150 300 600 Feet

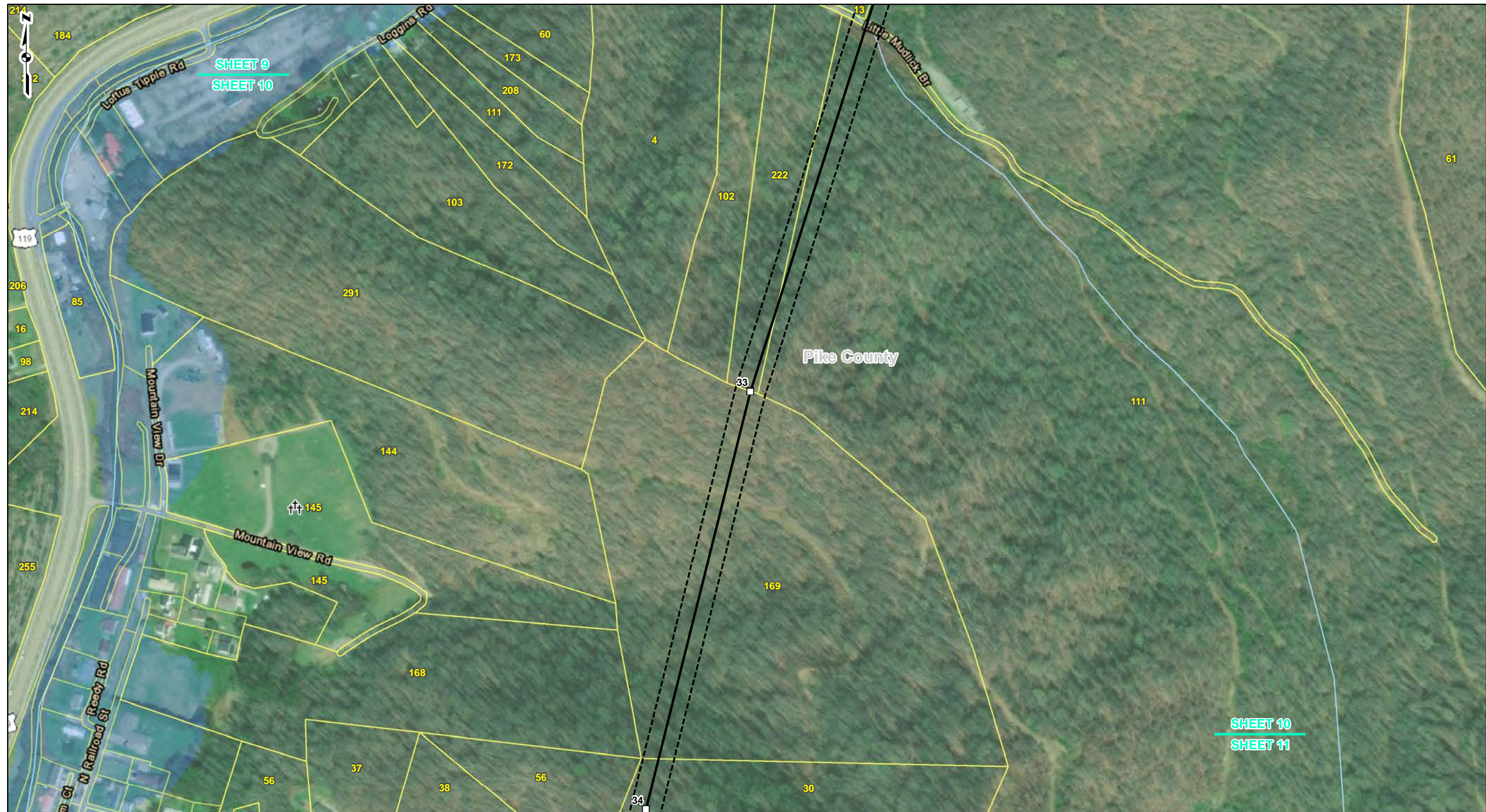
DETAILED MAPBOOK SHEET 9 OF 12

Belfry Area Improvements Project
 American Electric Power

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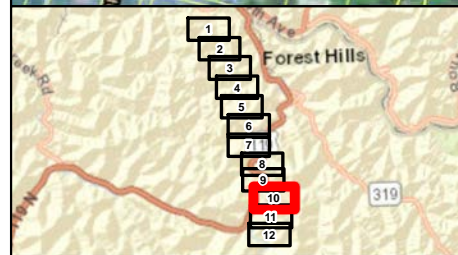
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SHEET 9
 SHEET 10

SHEET 10
 SHEET 11

Pike County



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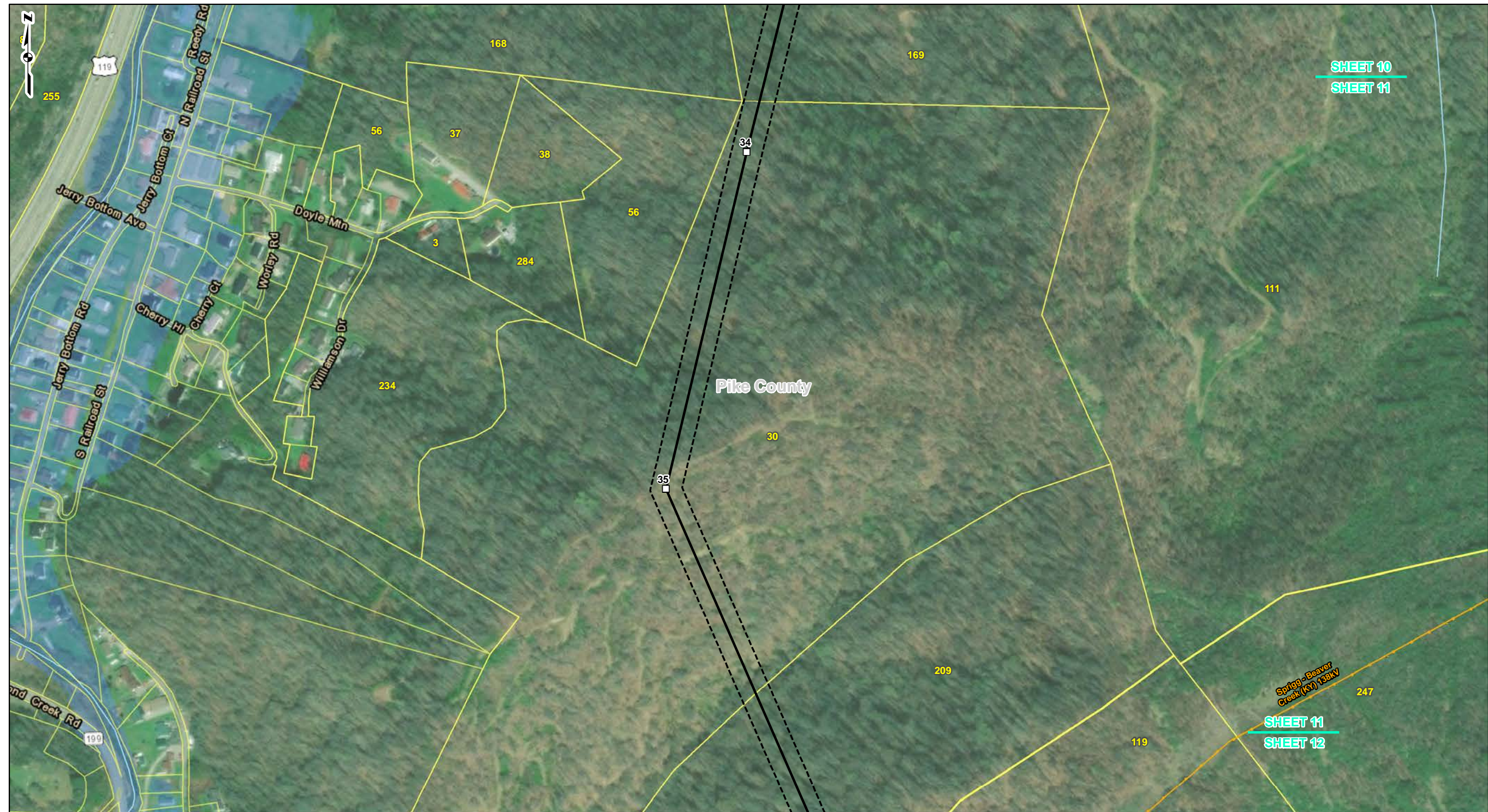
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▭ Parcel Boundary**		■ 100-Year Floodplain

0 150 300 600 Feet

**DETAILED MAPBOOK
 SHEET 10 OF 12**

Belfry Area
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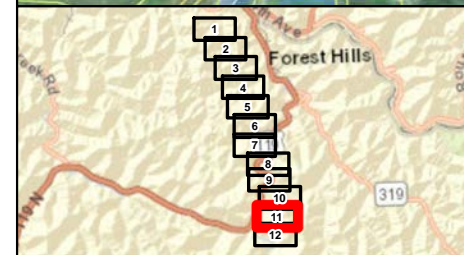
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SHEET 10
SHEET 11

SHEET 11
SHEET 12

Pike County



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▭ Parcel Boundary**		■ 100-Year Floodplain

0 150 300 600 Feet

DETAILED MAPBOOK SHEET 11 OF 12

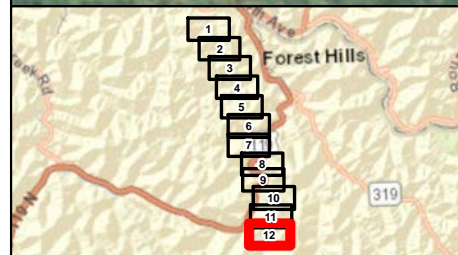
Belfry Area Improvements Project
American Electric Power

gal consultants KENTUCKY POWER

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SHEET 11
 SHEET 12



REFERENCES: WORLD IMAGERY, MAXAR (2021), ESRI, ARCGIS ONLINE, ACCESSED 09/2022; WORLD TRANSPORTATION, ESRI, ARCGIS ONLINE, ACCESSED 09/2022; NATIONAL HYDROGRAPHY DATASET (NHD) STREAMS, USGS, 2020; NATIONAL WETLAND INVENTORY (NWI) WETLANDS, USFWS, 2020; 100-YEAR FLOODPLAINS, FEDERAL EMERGENCY MANAGEMENT AGENCY (FEMA), 2020; CEMETERIES, CHURCHES, SCHOOLS, ESRI, ARCGIS ONLINE, 2021.

* Shown is a preliminary design. This design is not the final route centerline. Final line route and structure locations will be determined during final engineering, which includes ground survey and geotechnical and environmental studies. Nonetheless, the Company believes the centerline illustrated is the most suitable alignment based upon preliminary analysis.


**Parcels are not based on an accurate ground survey and should not be construed or used as exact descriptions of legal boundaries.

▲ Substation	— Existing 69kV or Lower Transmission Line	🏫 School
□ Proposed Structure*	— Existing 138kV Transmission Line	🏰 Church
— Proposed Route*	†† Cemetery	🌊 NHD Stream
- - - Proposed 100-Foot ROW*		🟢 NWI Wetland
▭ Parcel Boundary**		🟡 100-Year Floodplain

0 150 300 600 Feet

**DETAILED MAPBOOK
 SHEET 12 OF 12**

Belfry Area
 Improvements Project
 American Electric Power

gal consultants  KENTUCKY POWER

DRAWN BY: EFJ DATE: 9/28/2022
 CHECKED: APPROVED:

Kentucky Power Company
KPSC Case No. 2022-00236
Commission Staff's First Set of Data Requests
Dated September 22, 2022

DATA REQUEST

KPSC 1_6 Refer to the Application, Exhibit 10, page 12 of 92. Kentucky Power states Alternative Route D would require it to enter the Stone Substation on the south side. Explain why this is considered to be less desirable by the engineering team.

RESPONSE

Alternative Route D rebuilds on the existing Stone-Sprigg 46 kV Transmission Line centerline into the south side of the Stone Substation. Entering the Stone Substation from the south and using the existing ROW requires crossing the heavily developed Pond Creek Road, likely requiring the removal of at least one commercial building. The Proposed Route (Alternative Route E) enters the Stone Substation from the north and avoids crossing Pond Creek Road and minimizes impacts to residential development. Additionally, outage constraints require constructing on additional 1.6 miles of existing ROW and extended outages on the existing centerline. Please see the Company's response to KPSC 1_8 for additional details regarding outage constraints.

Witness: George T. Reese

Kentucky Power Company
KPSC Case No. 2022-00236
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Dated September 22, 2022

DATA REQUEST

KPSC 1_7 Refer to the Application, Exhibit 10, page 12 of 92. Explain whether the distribution lines along the Orinoco-Stone Project Component necessitate a northern orientation, and if so, why.

RESPONSE

Distribution lines were not a deciding factor in the orientation of the Orinoco Substation configuration. Rather, substation configuration is based on maximizing transmission line distance from the library to minimize impact to the public and using the buildable area effectively to construct the substation.

Witness: George T. Reese

Kentucky Power Company
KPSC Case No. 2022-00236
Commission Staff's First Set of Data Requests
Dated September 22, 2022

DATA REQUEST

KPSC 1_8 Refer to the Application, Exhibit 10, page 12 of 92. Kentucky Power states that Alternative Route D is susceptible to outage constraints during its construction timeline. Explain how and why potential outage constraints exist and provide all applicable supporting documentation.

RESPONSE

The existing Belfry Substation is served only off the Sprigg – Stone 46 kV Circuit with remote ends at the Sprigg and Stone Substations. Belfry Substation does not have any capability to transfer its current distribution load to another substation. Any proposed construction in the existing Sprigg – Stone 46 kV Transmission Line ROW would require sufficient time to remove the existing line and install the proposed facilities. During that time, customers served by the line being replaced would experience an outage. From an operational perspective, outages cannot be supported in the peak loading periods of the summer and winter seasons to support construction in the existing ROW. Any outage would present a high risk to the 1,547 distribution customers out of Belfry Substation.

Witness: Nicolas C. Koehler

Kentucky Power Company
KPSC Case No. 2022-00236
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Dated September 22, 2022

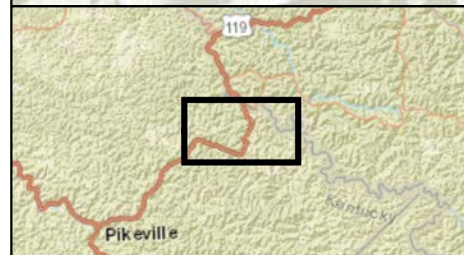
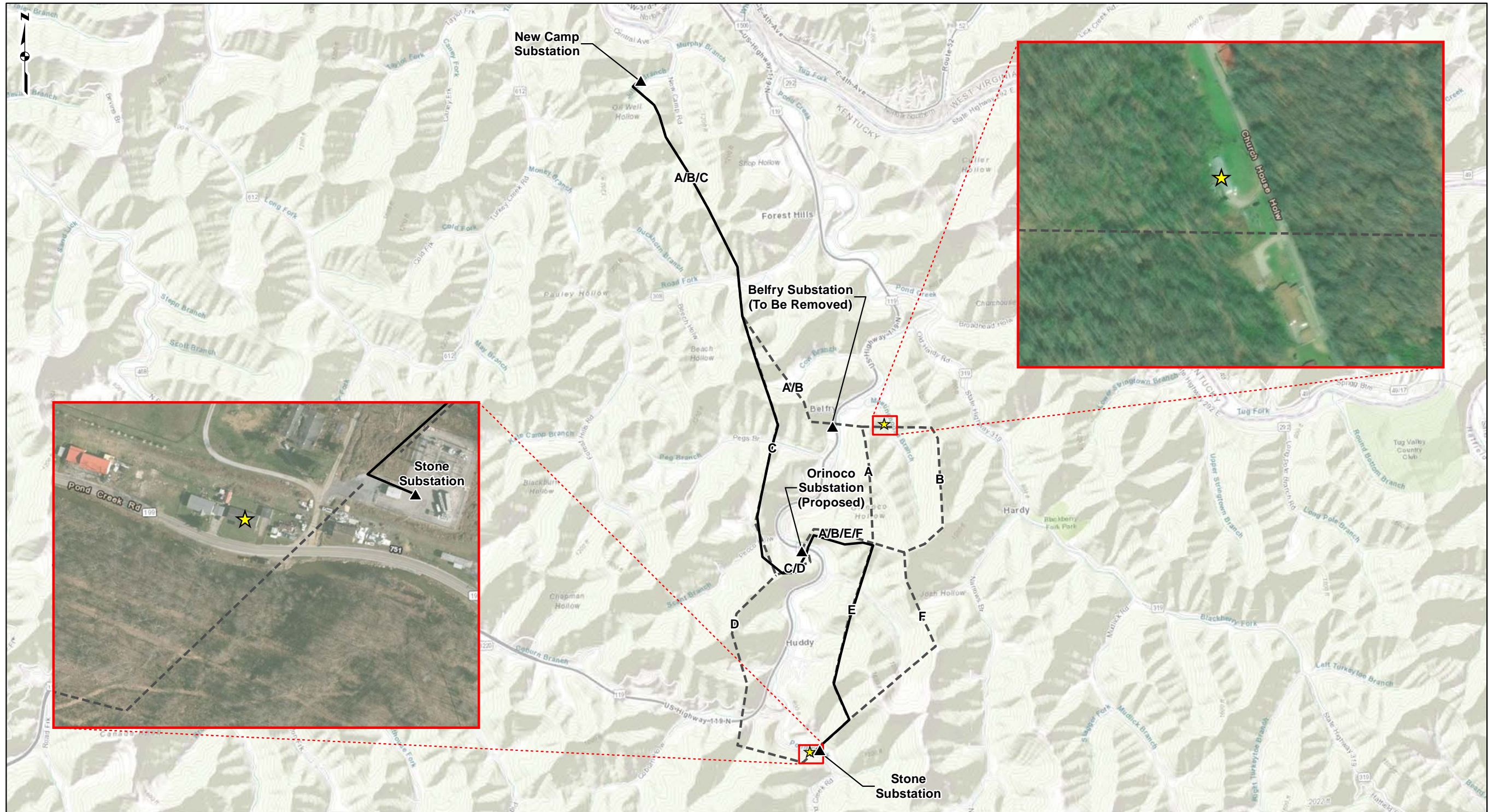
DATA REQUEST

KPSC 1_9 Refer to the Application, Exhibit 10, page 16 of 92. Kentucky Power states that there is one residence within 100 feet of the centerline for Alternate Route B for the New Camp Orinoco route and one residence within 100 feet of the centerline for Alternate Route D. Identify on a map where these two residences are located and include the proposed route on said map.

RESPONSE

Please see KPCO_R_KPSC_1_9_Attachment1 for map identifying the locations of the two referenced residences.

Witness: George T. Reese



REFERENCES: WORLD TOPOGRAPHIC, ESRI, ARCGIS ONLINE, ACCESSED 09/2022. WORLD TRANSPORTATION, ESRI, ARCGIS ONLINE, ACCESSED 09/2022. AERIAL IMAGERY, KYFROMABOVE PROGRAM, KENTUCKY DIVISION OF GEOGRAPHIC INFORMATION (DGI), ACCESSED 09/2022.

LEGEND

- ★ Residence Within 100' Of Route Alternative
- ▲ Substation
- Proposed Route
- - - Dismissed Alternative Route

0 1,750 3,500 7,000 Feet

RESIDENCES WITHIN 100' OF ROUTE ALTERNATIVE

Belfry Area Improvements Project
 American Electric Power

gal consultants KENTUCKY POWER

DRAWN BY: EFJ DATE: 9/30/2022
 CHECKED: APPROVED:

Kentucky Power Company
KPSC Case No. 2022-00236
Commission Staff's First Set of Data Requests
Dated September 22, 2022

DATA REQUEST

KPSC 1_10 Provide an explanation for choosing to retire certain portions of the 46 kV line from an engineering and reliability perspective. Please reference both the preferred routes and the alternatives in this explanation as well as duplication or cost considerations.

RESPONSE

The existing 46 kV network is insufficient to serve the needs of the area and has reached a level of deterioration that requires its replacement. Rebuilding the 46 kV facilities would also be insufficient as it would not solve all of the identified baseline, operational, and performance requirements in the area.

The Project proposes to build 6.5 miles of new 69 kV line and allows for the retirement of 8.2 miles of 46 kV line. The Company notes that retiring this 46 kV line does not result in any degradation of the system nor result in any new violations on the system because the new 69 kV is replacing the 46 kV that is being retired. The Company also notes that adding looped service at New Camp (i.e., providing two feeds into the station) will result in more reliable and resilient service to customers. Looped service will continue to be provided to existing customers served from Orinoco substation (previously Belfry).

Please see the Company's answer to KPSC 1-28 for a discussion of planning alternative cost considerations.

Witness: Nicolas C. Koehler

Kentucky Power Company
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DATA REQUEST

KPSC 1_11 Refer to the Application, page 12. Provide a chart containing a cost breakdown of each route including both the preferred route and the alternative route, including the categories as broken down at the bottom of page 12.

RESPONSE

Please see the below table for a high-level conceptual cost breakdown of each Alternative Route considered. The below estimated costs are based on an applied cost per line mile for the Company's Proposed Route multiplied by the length of each Alternative Route. The main drivers for construction costs are construction labor, materials, access road requirements, and ROW acquisition. These underlying cost drivers are largely comparable for the entirety of the Study Area, which is in predominantly rugged terrain. The estimated costs in the remaining categories at the bottom of page 12 of the Application would remain unchanged if the Company were proposing to construct any of the Alternate Routes. The below costs represent the best estimates the Company has at this time without completion of final ROW acquisition, access road determination, and final structure spotting.

New Camp - Orinoco			Orinoco - Stone		
A	B	C-Proposed	D	E-proposed	F
\$20.8M	\$25.2M	\$18.6M	\$10.2M	\$10.2M	\$11.9M

Witness: Nicolas C. Koehler

Witness: George T. Reese

Kentucky Power Company
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DATA REQUEST

KPSC 1_12 Refer to the Direct Testimony of Brian West (West Testimony), page 9, line 4. Explain what the North American Electric Reliability Council (NERC) Right-Of-Way (ROW) requirement is for both 46 kV transmission lines and 69 kV transmission lines.

RESPONSE

The width of secured transmission line ROW shall be sufficient that the installed facilities can operate to their full design capacity without limitations from current or reasonably anticipated changes in land use within or beyond the limits of the secured ROW. For transmission lines of voltages of 69 kV and below composed primarily of H-frame construction, the basic ROW width is 100 feet. A width of 100 feet has historically been adequate to establish conductor clearances to the edge of ROW. Steep mountainous terrain, long span lengths, and varying structure types are a few of the factors that may influence the need for additional width. At a minimum, the determined final ROW extents must encompass conductor blow-out, structure components, and sufficient clearances to vegetation in order to maintain a reliable electric transmission system while accounting for the adequate safety of the public.

Witness: Brian K. West

Kentucky Power Company
KPSC Case No. 2022-00236
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Dated September 22, 2022

DATA REQUEST

KPSC 1_13 Refer to the West Testimony, page 9, lines 6–16. Explain what conductor blowout requirements are and how they impact ROW requirements.

RESPONSE

Conductor blow-out is defined as the distance from the overhead conductor at rest to the physical location of the conductor when displaced by wind. Adequate ROW must be obtained to encompass the resulting conductor zone; the area defined by the position of outermost conductors, extended vertically to ground, when the conductors are displaced by 6 psf (~48 mph) and are at 60° F. The wind is applied in multiple directions to determine the maximum conductor displacements, both left and right, from centerline.

Witness: Brian K. West

Kentucky Power Company
KPSC Case No. 2022-00236
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DATA REQUEST

KPSC 1_14 State whether the spans identified in the West Testimony, page 9, lines 8–16 are more subject to, or at risk for, conductor blowout issues than other spans of transmission line in the proposed project.

RESPONSE

Yes, the Company has identified these particular spans as more at risk for conductor blowout issues, based on the current preliminary design. Generally, conductor blow-out is defined as the distance from the overhead conductor at rest to the physical location of the conductor when displaced by wind. The wind is applied in multiple directions to determine the maximum conductor displacements, both left and right, from centerline. Based on current preliminary design, the Company identified the spans on page 9, lines 8-16 of the West Testimony as susceptible to conductor blowout issues. It is possible that other spans may in the future be identified as susceptible to conductor blowout issues. As stated in the Application, changes within the specified corridor are possible until landowner negotiations, (environmental, cultural, and geological) studies, and final engineering are completed. These changes have the potential to impact the identified spans and/or classify additional spans.

Witness: Brian K. West

Kentucky Power Company
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Dated September 22, 2022

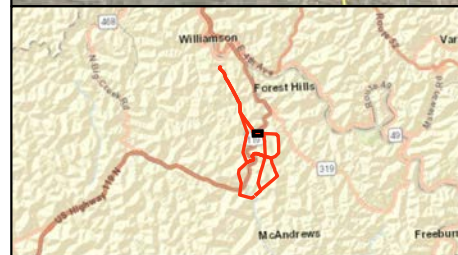
DATA REQUEST

KPSC 1_15 Refer to the Direct Testimony of George T Reese (Reese Testimony), page 5–6. Further explain why expanding the existing Belfry Substation in its current location is not possible, and why doing so would require the purchase of three residences.

RESPONSE

The existing Belfry Substation has fence dimensions of approximately 60' by 70' and has no room for additional equipment. Due to outage constraints, any site expansion would have required additional property in order to avoid lengthy disruption to customers. The existing Belfry Substation is bounded by steep hillside to the north and west, United States Route 119 to the east, and by residences and corresponding residential outbuildings to the south. Three residences are located in the area needed to expand the substation. These three homeowners were contacted to inquire about purchases of their property to allow for the expansion of the existing substation. Two of them were not willing to sell which eliminated the possibility of station expansion adjacent to the existing Belfry Substation. As a result, alternative sites were examined. Please see KPCO_R_KPSC_1_15_Attachment1 for a map identifying the locations of the three referenced residences and the existing Belfry Substation.

Witness: George T. Reese



REFERENCES: WORLD STREET MAP, ESRI, ARCGIS ONLINE, ACCESSED 09/2022. WORLD TRANSPORTATION, ESRI, ARCGIS ONLINE, ACCESSED 09/2022. AERIAL IMAGERY, KYFROMABOVE PROGRAM, KENTUCKY DIVISION OF GEOGRAPHIC INFORMATION (DGI), ACCESSED 09/2022. NATIONAL HYDROGRAPHY DATASET (NHD) STREAMS, USGS, 2020. NATIONAL WETLAND INVENTORY (NWI) WETLANDS, USFWS, 2020. 100-YEAR FLOODPLAINS, FEDERAL EMERGENCY MANAGEMENT AGENCY (FEMA), 2020.



*Parcels are not based on an accurate ground survey and should not be construed or used as exact descriptions of legal boundaries.

LEGEND

- ▲ Substation
- Existing 46kV Transmission Line
- 10-Ft Contour
- - - NHD Stream
- 100-Year Floodplain
- Parcel Boundary*

0 50 100 200 Feet

BELFRY SUBSTATION SITE


 Belfry Area Improvements Project
 American Electric Power
 

DRAWN BY: EFJ DATE: 9/28/2022
 CHECKED: APPROVED:

Kentucky Power Company
KPSC Case No. 2022-00236
Commission Staff's First Set of Data Requests
Dated September 22, 2022

DATA REQUEST

KPSC 1_16 Compare the estimated cost of constructing the proposed Orinoco Substation at the location that was selected to the estimated cost of constructing the proposed substation at each of the alternative locations considered. Provide any supporting documentation or cost breakdown for each option.

RESPONSE

Each alternative substation site considered would have required the construction of a new substation for which the costs for station equipment and construction would be comparable across all alternatives considered.

As indicated in the Orinoco Substation Siting Study in the Application (See Exhibit 10 beginning on page 23 of 92), five potential sites were examined for the new Orinoco Substation. In this instance the Company did not consider the estimated cost of constructing the proposed Orinoco Substation at alternative sites because each alternative site identified presented constraints that eliminated them as potential alternatives. Various siting constraints referenced in the Siting Study eliminated four of the sites and the only viable site was determined to be the proposed Orinoco Substation solution. Thus, each of those four alternatives were not workable regardless of cost.

Witness: Nicolas C. Koehler

Witness: George T. Reese

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DATA REQUEST

KPSC 1_17 Refer to the Reese Testimony, page 15, lines 4–5. Provide a copy of the letter and fact sheet provided in the August 26, 2021 packet mailing and explain whether any additional information was handed out at the public meetings. If so, provide copies of that additional information.

RESPONSE

The letter and fact sheet from the August 26, 2021 mailing are provided in KPCO_R_KPSC_1_17_Attachment1. There was no additional information handed out at the public meeting.

Witness: George T. Reese



An AEP Company

BOUNDLESS ENERGY™

August 26, 2021

IMPORTANT MESSAGE ABOUT YOUR PROPERTY

Name
Address
City, State Zip
MAP ID:

Subject: Belfry Area Transmission Line Project Announcement – Invitation to Virtual Open House & Live Virtual Town Hall

Dear Neighbor,

You are receiving this letter because you own property or live in the area where Kentucky Power representatives plan to upgrade the local power grid.

The Belfry Area Transmission Line Project in Pike County involves:

- Building 6-8 miles of 69-kilovolt (kV) transmission line
- Retiring approximately 9 miles of 46-kV transmission line
- Building the Orinoco Substation
- Retiring the Belfry Substation

Installing modern equipment and upgrading facilities reduces the need for frequent equipment maintenance and improves electric service reliability by providing a second source of power to customers served by the New Camp Substation.

We are committed to keeping you informed about this project while also keeping our customers and employees safe and healthy during COVID-19. We invite you to learn more and share your input in the ways listed below.

MATERIALS ENCLOSED WITH THIS LETTER:

- Review the enclosed fact sheet for additional project information.
- Locate your property on the enclosed map (please reference the Map ID at the top of this letter to find your property on the map). Feel free to write notes on the map for our project team to review.
- Complete the enclosed comment card and mail it back to us (along with the map if you've written notes on it) in the self-addressed, stamped envelope provided.

PROJECT WEBSITE WITH VIRTUAL OPEN HOUSE:

Please visit KentuckyPower.com/Belfry to access project information, view an interactive map, enter our virtual open house and submit comments through a "Contact Us" link.

LIVE VIRTUAL TOWN HALLS:

We plan to host two live virtual town hall events featuring a presentation from the Kentucky Power project team, followed by a Q&A session:

- **Thursday, September 9, 2021 from noon to 1 p.m.**

If joining by phone, dial **1-415-655-0001** and enter the following access code when prompted: **161 978 3600**
If joining online, visit KentuckyPower.com/BelfryTownHall1, Event password: **Belfry**

- **Thursday, September 9, 2021 from 5 p.m. to 6 p.m.**

If joining by phone, dial **1-415-655-0001** and enter the following access code when prompted: **161 791 3291**
If joining online, visit KentuckyPower.com/BelfryTownHall2, Event password: **Belfry**



An **AEP** Company

BOUNDLESS ENERGY™

Please share your input on this project by Thursday, September 23, 2021. We welcome and encourage your feedback.

Our team plans to use your input to determine a power line route that minimizes impact to the community and environment. When sharing your input please feel free to include information about your property, such as:

- Historically significant buildings or landmarks such as cemeteries
- Natural features such as wetlands or springs
- Future plans for your property

We look forward to receiving your feedback.

Sincerely,

A handwritten signature in cursive script that reads "Cortney Mustard". The signature is written in black ink and is positioned above the typed name and contact information.

Cortney Mustard
Outreach Specialist
833-760-0604
KentuckyPowerOutreach@aep.com

BELFRY AREA TRANSMISSION LINE PROJECT



Kentucky Power representatives plan to upgrade the electric transmission grid in Pike County. The Belfry Area Transmission Line Project involves building 6-8 miles of 69-kilovolt (kV) electric transmission line and an electrical substation to enhance electric reliability for area customers.



WHAT

The project involves:

- Building 6-8 miles of 69-kV transmission line
- Retiring approximately 9 miles of 46-kV transmission line
- Building the Orinoco Substation
- Retiring the Belfry Substation

This project involves filing an application with the Kentucky Public Service Commission. Public comment period for this project closes September 23, 2021.

WHY

Project benefits include:

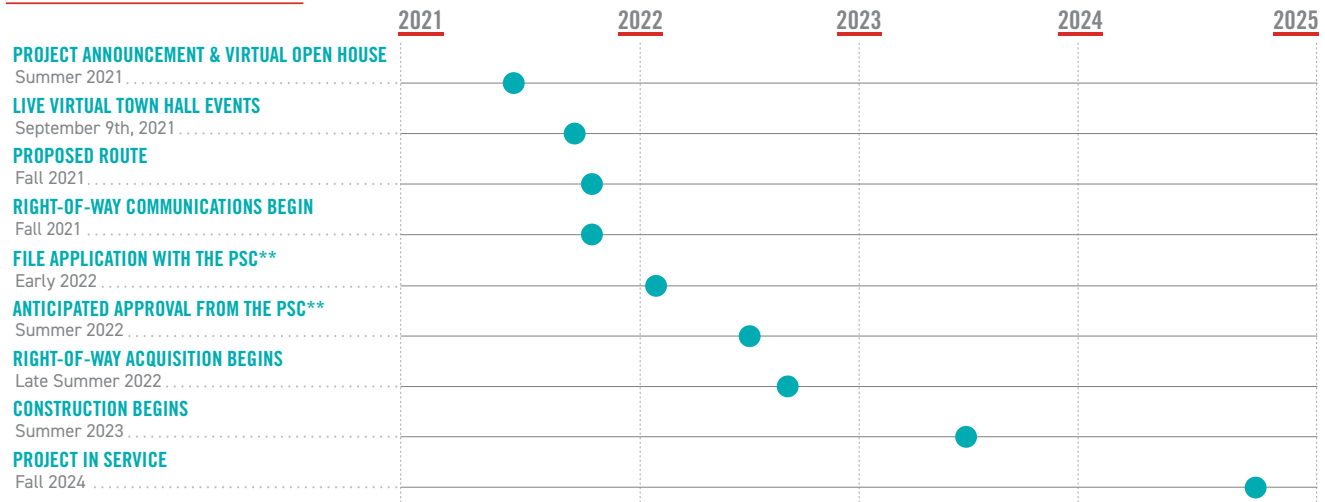
- Retiring approximately 9 miles of transmission line that includes wooden poles from the 1940's. The line has experienced multiple power outages in recent years.
- Providing a second source of power to customers served from the New Camp Substation.
- Upgrading the power grid from a 46-kV system to 69-kV, strengthening the local electric system and increasing reliability for area customers.

WHERE

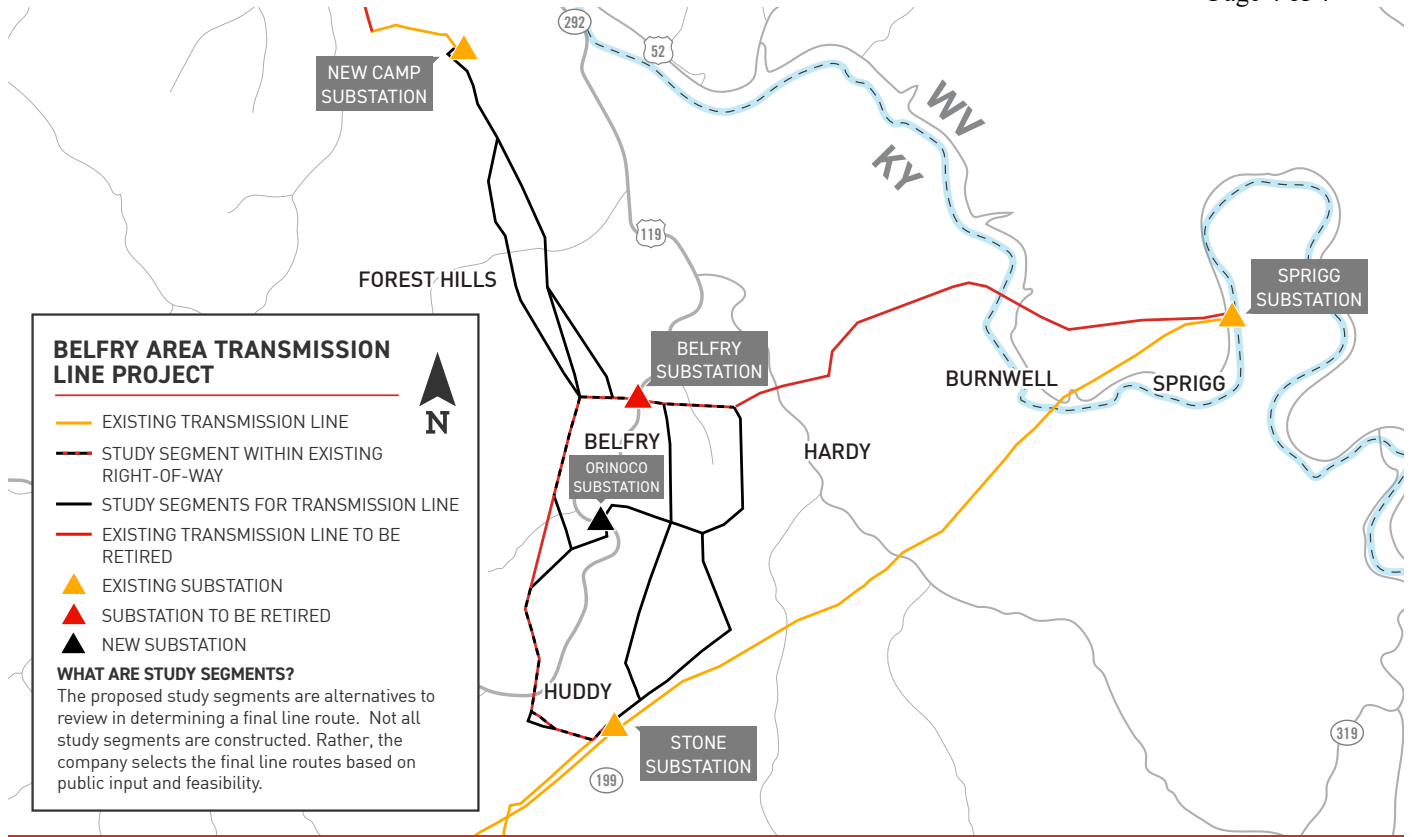
The project begins at the New Camp Substation in South Williamson and continues southeast to the proposed Orinoco Substation located along Route 119.

From there the project continues south through Belfry to the Stone Substation near Route 199.

PROJECT SCHEDULE



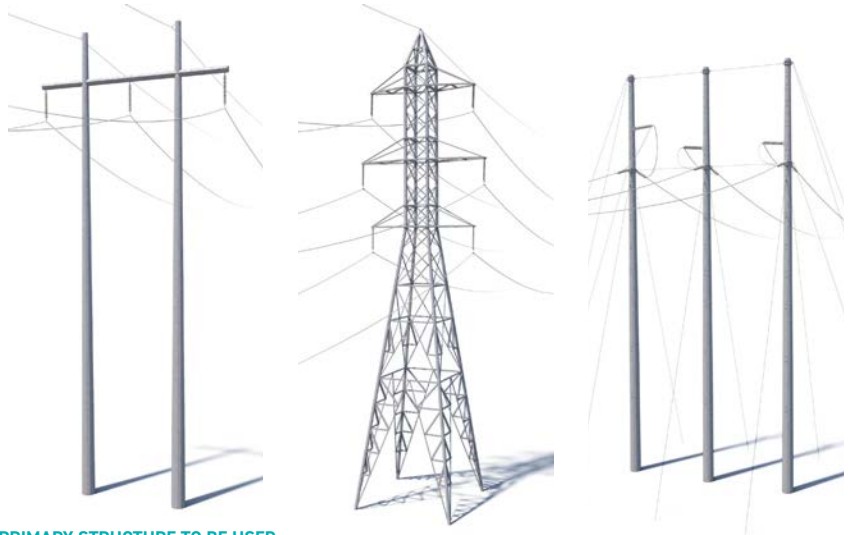
**Kentucky Public Service Commission *Timeline subject to change



TYPICAL STRUCTURES

Crews plan to install primarily H-frames. At certain points, crews could use Lattice towers and three-pole structures with guy wire.

Typical Structure Height:
 Approximately 80-100 feet*
 Typical Right-of-Way Width:
 Approximately 100 feet*



*PRIMARY STRUCTURE TO BE USED

H-FRAME*

LATTICE TOWER

THREE-POLE STRUCTURES

*Exact structure, height and right-of-way requirements may vary

KENTUCKY POWER VALUES YOUR INPUT ABOUT THIS PROJECT. PLEASE SEND COMMENTS AND QUESTIONS TO:

CORTNEY MUSTARD

Project Outreach Specialist
 833-760-0604
 KentuckyPowerOutreach@aep.com
[KentuckyPower.com/Belfry](https://www.kentuckypower.com/Belfry)



Kentucky Power Company
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DATA REQUEST

KPSC 1_18 Refer to the Reese Testimony, page 15, lines 20–22; and page 16, lines 1–2; and page 21, lines 20–22. Also, refer to the West Testimony, page 7, lines 20–21; and page 8, lines 1-16. Explain whether any landowner who may be affected by the movement of the center line in any direction was notified of the possibility that the centerline and associated ROW could shift up to 200 feet in any direction from the selected location in the landowner notifications or public meetings prior to the filing of this proceeding. If not, explain why not.

RESPONSE

The Company filed its application herein on September 8, 2022. The Company's notice of intent filed herein on July 29, 2022, and landowner notifications mailed on August 24, 2022,¹ stated that

The proposed 69 kV transmission line will be built using both existing right-of-way and right-of-way to be acquired. The right-of-way will generally be maintained at a 100 foot width, except where a wider right-of-way of up to 400 feet is required in areas of unusually steep terrain or where doing so is required by the safe and efficient operation of the proposed transmission line.

All materials presented to the public during the open house or in informational packages indicated that routes were preliminary and subject to change.

¹ The Company inadvertently failed to attach a sample copy of the landowner notification mailed August 24, 2022 as part of Exhibit 12 to the Application. The Company will make a supplemental filing of Application Exhibit 12 that includes the sample notice.

Witness: George T. Reese

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DATA REQUEST

KPSC 1_19 Refer to the Reese Testimony, page 17, lines 1–4. Explain why the two Study Segments were eliminated.

RESPONSE

Please refer to the Siting Study Section 4.0 (Application, Exhibit 10, page 7 of 92 and Map 2, page 46 of 92), and to Exhibit 10-Attachment C, Map 2. The Siting Team reviewed the Study Segments, constraints, and comments in detail to determine if any Study Segments should be revised or eliminated. As a result of the Study Segment review, Study Segments 02 and 06 were eliminated after the open house based on engineering review. On Study Segment 02, engineers determined that residences along Forest Hills Road would likely be within the blowout area of the conductors and would need to be removed. Study Segment 06 was a connector segment from Study Segment 02 and was eliminated as it was no longer needed.

Witness: George T. Reese

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DATA REQUEST

KPSC 1_20 Refer to the Reese Testimony, page 22, lines 3–11. If the proposed ROW is approved as proposed and if there were to be another landslide along the route, explain whether the line would be impacted. If so, explain why Kentucky Power would not move the centerline and ROW further away from the danger initially in the application.

RESPONSE

Landslide risk is generally present across the entire region in which the Project is planned. The precise location and size of potential future landslide activity cannot be predicted with 100 percent certainty since future landslide risk will be impacted by natural events, such as precipitation, and man-made occurrences, such as earth disturbances, along and adjacent to the proposed ROW. Furthermore, the precise location of the transmission line infrastructure within the ROW will not be finalized until later stages of the transmission line design process. Therefore, it is possible that the centerline may be moved in order to specifically address such landslide concerns if/when additional data is obtained indicating such a move would be prudent. At this time, the Company cannot confirm whether a landslide will occur and determine the location and extent of future impact of potential future landslide activity along the route. The proposed transmission line centerline and proposed ROW width have been established to minimize landslide risk areas where possible, based on the studies performed as of the date of this application and to provide some degree of flexibility to avoid locations of potential future landslides to the extent practicable and based on the data available to the Company now.

Witness: George T. Reese

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DATA REQUEST

KPSC 1_21 Refer to the Reese Testimony, page 22, lines 11–13.

- a. Explain what the required in-service date is and how it was decided and set.
- b. Explain the ramifications of not meeting the required in-service date. For example, is there a NERC safety regulation or PJM requirement that mandates that the required in-service date be met.

RESPONSE

a. The planning criteria violations were identified in 2025 Winter RTEP study case. An in-service date of December 1, 2025 would mitigate the risk of voltage violations before they may occur as studied.

b. PJM baseline projects required in-service dates are driven by FERC 715 criteria which includes various drivers such as voltage violations, thermal violation, and generation dispatch etc. In case of New Camp Loop/ Belfry Area Improvements Project, not adhering to the required in-service date could force a load drop and requirement of special operational plans to protect the system in the event of contingencies.

Witness: Nicolas C. Koehler

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DATA REQUEST

- KPSC 1_22** Refer to the Direct Testimony of Nicolas C. Koehler (Koehler Testimony), page 10, lines 21–23; and page 11, lines 1–10.
- a. Explain the date of the last two inspections of the Sprigg-Stone 46 kV circuit.
 - b. Explain how many of the current open conditions were found at each of the last two Sprigg-Stone 46 kV circuit inspections.
 - c. Provide a list of the open conditions that were repaired at each of the last two Sprigg-Stone 46 kV circuit inspections.

RESPONSE

- a. The most recent aerial inspections occurred in April 2022 and in October 2021. The most recent comprehensive walking inspection occurred from May 6th through May 12th, 2021. The comprehensive walking inspection in 2019 occurred throughout the year, from January 14th through 30th, on April 10th, on May 16th, and on October 28th.
- b. Of the total 133 open conditions listed in the Koehler Testimony, 132 of them were reported during those two comprehensive walking inspection cycles. All 132 of these conditions were either reported for the first time or confirmed during the 2021 inspection. There were 120 conditions listed in the Koehler Testimony that were either reported for the first time or confirmed during the 2019 inspection. The one open condition not reported in these two comprehensive walking inspections was for a broken insulator. This condition was reported in April 2022 during a routine aerial inspection.
- c. Following the comprehensive walking inspections in 2019 and 2021, a total of 5 conditions have been or are currently being remediated. Of these conditions, 3 are listed in the Koehler Testimony and currently have planned work to address them. These include the rot top pole, broken crossarm, and disconnected X-brace on Structure K426-17. Also on Structure K426-17, there is 1 conductor with debris condition with planned work to address it. This debris was the result of a tree from outside of the ROW contacting the conductor on July 8th, 2022. Because this debris presented a situation requiring urgent condition stabilization, a temporary repair was completed to place the line back in-service on July 9th, 2022. The permanent solution is to replace the structure which also addresses the 3 conditions noted in the Koehler Testimony. Because the system is now stabilized, this permanent fix is currently being designed and scheduled. In addition, there was a broken crossarm on K426-43 that was removed because it required

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urgent condition stabilization. Because this work on K426-43 was fully completed in 2021, it was not included in the Koehler Testimony.

Witness: Nicolas C. Koehler

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DATA REQUEST

KPSC 1_23 Refer to the Koehler Testimony, page 11, lines 11–14. Explain whether the voltage drop violations identified at the New Camp 69 kV substation in the event of an N- 1-1 scenario involving the loss of the 138/69 kV transformer at Johns Creek and loss of the Inez-Sprigg 138 kV line were the only violations identified that would be alleviated with the proposed project. If not, explain what other violations will be alleviated.

RESPONSE

Yes, the voltage drop violations identified at the New Camp 69 kV Substation in the event of an N-1-1 scenario involving the loss of the 138/69 kV transformer at Johns Creek and loss of the Inez-Sprigg 138 kV Transmission Line were the only violations identified in the 2025 RTEP analysis that would be alleviated with the proposed Project.

Witness: Nicolas C. Koehler

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DATA REQUEST

KPSC 1_24 Refer to the Kohler Testimony, page 11, lines 15–20. State whether the voltage drop violations occurred prior to the addition of the loads of Cyber Innovation Group LLC (Cyber Innovation) and Discover AI LLC (Discover AI).

RESPONSE

Yes, the voltage drop violations occurred prior to the addition of the loads of Cyber Innovation Group LLC and Discover AI LLC.

Witness: Nicolas C. Koehler

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DATA REQUEST

KPSC 1_25 Provide the available capacity of Kentucky Power's transmission facilities located in the area referred to in the Application as the "Belfry Area" prior to the addition of the loads of Cyber Innovation and Discover AI.

RESPONSE

The existing ratings of the assets are listed below. These ratings are not impacted by the customers.

Sprigg – Stone 46 kV Circuit comprised of:

Sprigg - Belfry 46 kV Section

Existing Summer Emergency Conductor Capacity: 27 MVA

Existing Winter Emergency Conductor Capacity: 37 MVA

Belfry - Stone 46 kV Section

Existing Summer Emergency Conductor Capacity: 27 MVA

Existing Winter Emergency Conductor Capacity: 37 MVA

Hatfield 138/69/46kV

Existing Nameplate Capacity: 130 MVA

Johns Creek – Hatfield 69kV Circuit comprised of:

Johns Creek – Mcinnes Metering 69 kV Section

Existing Summer Emergency Conductor Capacity: 75 MVA

Existing Winter Emergency Conductor Capacity: 94 MVA

Mcinnes Metering – Big Creek SS 69 kV Section

Existing Summer Emergency Conductor Capacity: 75 MVA

Existing Winter Emergency Conductor Capacity: 94 MVA

Big Creek SS – Sidney SS 69 kV Section

Existing Summer Emergency Conductor Capacity: 75 MVA

Existing Winter Emergency Conductor Capacity: 94 MVA

Sidney SS – Bevins 69 kV Section

Existing Summer Emergency Conductor Capacity: 75 MVA

Existing Winter Emergency Conductor Capacity: 94 MVA

Bevins – Gund Mine SS 69 kV Section

Existing Summer Emergency Conductor Capacity: 75 MVA

Existing Winter Emergency Conductor Capacity: 94 MVA

Gund Mine SS – Hatfield 69 kV Section

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Existing Summer Emergency Conductor Capacity: 75 MVA
Existing Winter Emergency Conductor Capacity: 94 MVA

Hatfield – New Camp 69kV Radial Circuit:

Existing Summer Emergency Conductor Capacity: 50 MVA
Existing Winter Emergency Conductor Capacity: 63 MVA

Witness: Nicolas C. Koehler

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DATA REQUEST

KPSC 1_26 Provide the current available capacity of Kentucky Power's transmission facilities in the Belfry Area.

RESPONSE

Please see the Company's response to KPSC 1_25.

Witness: Nicolas C. Koehler

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DATA REQUEST

KPSC 1_27 Provide the expected available capacity in the Belfry Area once the proposed project is complete.

RESPONSE

The expected new ratings are listed below. Ratings on the New Camp – Stone 69 kV Circuit were added and the Sprigg – Stone 46 kV Circuit will be retired. The Hatfield – New Camp Circuit is no longer radial.

New Camp – Stone 69kV Circuit comprised of:

- New Camp – Orinoco 69 kV Section
 - Proposed Summer Emergency Conductor Capacity: 142 MVA
 - Proposed Winter Emergency Conductor Capacity: 160 MVA
- Orinoco – Stone 69 kV Section
 - Proposed Summer Emergency Conductor Capacity: 142 MVA
 - Proposed Winter Emergency Conductor Capacity: 160 MVA

Hatfield 138/69/46kV

Existing Nameplate Capacity: 130 MVA

Johns Creek – Hatfield 69kV Circuit comprised of:

- Johns Creek – Mcinnes Metering 69 kV Section
 - Existing Summer Emergency Conductor Capacity: 75 MVA
 - Existing Winter Emergency Conductor Capacity: 94 MVA
- Mcinnnes Metering – Big Creek SS 69 kV Section
 - Existing Summer Emergency Conductor Capacity: 75 MVA
 - Existing Winter Emergency Conductor Capacity: 94 MVA
- Big Creek SS – Sidney SS 69 kV Section
 - Existing Summer Emergency Conductor Capacity: 75 MVA
 - Existing Winter Emergency Conductor Capacity: 94 MVA
- Sidney SS – Bevins 69 kV Section
 - Existing Summer Emergency Conductor Capacity: 75 MVA
 - Existing Winter Emergency Conductor Capacity: 94 MVA
- Bevins – Gund Mine SS 69 kV Section
 - Existing Summer Emergency Conductor Capacity: 75 MVA
 - Existing Winter Emergency Conductor Capacity: 94 MVA
- Gund Mine SS – Hatfield 69 kV Section
 - Existing Summer Emergency Conductor Capacity: 75 MVA

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Existing Winter Emergency Conductor Capacity: 94 MVA

Hatfield – New Camp 69kV Circuit:

Existing Summer Emergency Conductor Capacity: 50 MVA

Existing Winter Emergency Conductor Capacity: 63 MVA

Witness: Nicolas C. Koehler

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DATA REQUEST

KPSC 1_28 Refer to the Direct Testimony of Nicolas Koehler (Koehler Testimony), pages 14 and 15. Provide the estimated cost of constructing the electrical alternatives to the proposed project that were evaluated by Kentucky Power.

RESPONSE

The following costs were provided to PJM as the planning alternatives costs to the proposed solution. These costs were provided in 2020 when the Project was originally proposed. Since then, the Project has gone through detailed scoping as part of the normal course of business. The cost of steel, labor, and more detailed route have resulted in increased costs that are not reflected in the PJM slides. The Company reasonably expects that these cost increases would also apply to the alternative costs listed here, which would result in the proposed Project still being the most cost effective solution to address all the identified needs in the area.

Transmission Costs:
Supplemental Alternative: \$32.1 M
Baseline Alternative: \$0.37 M

Witness: Nicolas C. Koehler

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DATA REQUEST

KPSC 1_29 Refer to the Koehler Testimony, page 11, lines 20-23. Confirm that the Hatfield substation is located where the Hatfield-Inez 138 kV circuit intersects the Hatfield- Williamson 69 kV circuit. If not, provide an updated map showing the correct location.

RESPONSE

Confirmed, the Hatfield Substation is located where the Hatfield-Inez 138 kV circuit intersects the Hatfield-Williamson 69 kV circuit.

Witness: Nicolas C. Koehler

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DATA REQUEST

- KPSC 1_30** Refer to the Koehler Testimony, page 14, lines 17–18.
- a. Explain why the Turkey Creek Tap is being retired.
 - b. Explain whether the ROW for both the Turkey Creek Tap and the Stone-Sprigg 46 kV circuit is being retained or relinquished.

RESPONSE

- a. Turkey Creek Tap used to serve a coal mining facility. The customer has been disconnected since 2012. This Tap serves no load.
- b. No, the Turkey Creek Tap ROW will not be retained. The ROW along the Stone-Sprigg 46 kV Circuit will be retained only between Structures K426-26 and K426-17.

Witness: Nicolas C. Koehler

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DATA REQUEST

KPSC 1_31 Refer to the Koehler Testimony, page 15, lines 8 and 9. Explain the outage and terrain constraints that limit the ability to rebuild fully within the existing ROW. Identify all areas in which greenfield construction has been chosen instead of building within the existing ROW and provide the reasons for the decision.

RESPONSE

Greenfield construction is proposed for the majority of the Proposed Route with the exception of ~0.7 miles between existing Structures K426-26 (~700 ft North of Pegs Branch) to K426-17 (~450 ft North of Right Fork Pecco Hollow).

Please see the Company's response to KPSC 1_6 and KPSC 1_8 for additional details.

Witness: Nicolas C. Koehler

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DATA REQUEST

KPSC 1_32 Refer to the Application, Exhibit 10. For the areas identified as areas where greenfield construction has been chosen, provide the cost difference of building in the existing ROW as compared to greenfield construction.

RESPONSE

The Company has not prepared an estimate of the referenced cost differences, and doing so would require information that the Company currently does not possess given the amount of variable factors that would go into such an estimate. The area where greenfield construction was selected over the use of existing ROW is the line route between Orinoco Substation and Stone Substation. Outage constraints and reliability of service to customers are among the primary considerations for selecting this option. Because of the outage considerations discussed in the response to KPSC 1_8, Alternative Route D (i.e., the only option for the Orinoco – Stone Project Component that uses the existing Stone – Sprigg 46kV Transmission Line ROW) was not selected. Therefore, outage considerations eliminated this option.

The Company further notes that at a very general level the difference in cost between existing ROW and greenfield ROW may be partially due to costs associated with the acquisition of new ROW if line lengths are generally the same and the existing line has good existing access. In this particular case, the existing transmission line does not have good existing access roads. In contrast, Alternative Route E (i.e., the selected alternative), has some existing access roads due to oil and gas development in the area.

Witness: George T. Reese

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DATA REQUEST

KPSC 1_33 Provide documentation regarding the specific voltage violations, including locations, frequencies and any charts documenting the PJM violations.

RESPONSE

Please see KPCO_R_KPSC_1_33_Attachment1. The attachment includes information presented at PJM and references the baseline work to be completed. The voltage violation two flow gates, AEP-VD160, and AEP-VD1161 at New Camp Substation and the baseline alternatives are displayed in the links to the PJM subregional slides.

Witness: Nicolas C. Koehler

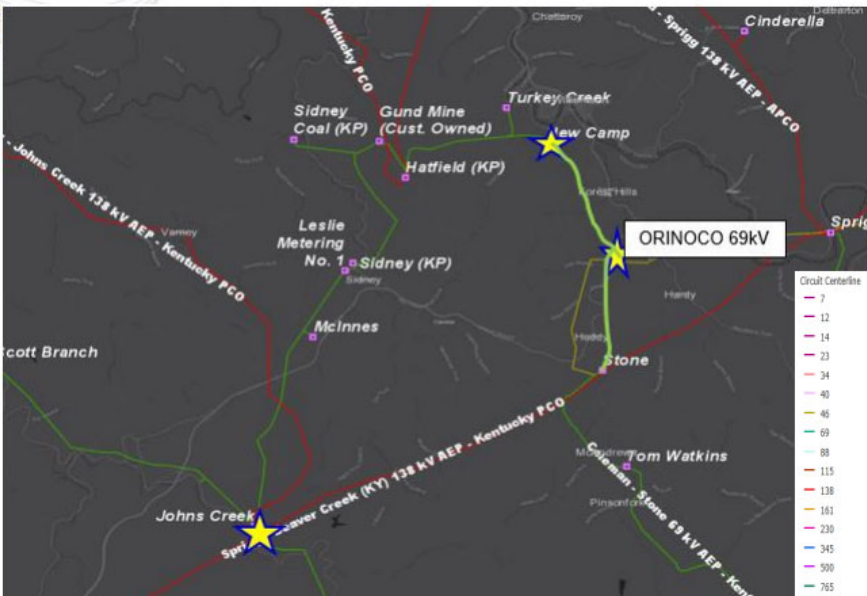
KPSC 1_33 Attachment



AEP Transmission Zone: Baseline New Camp - Stone 69kV

Process Stage: First Review
Criteria: AEP 715 criteria
Assumption Reference: 2025 RTEP assumption
Model Used for Analysis: 2025 RTEP cases
Proposal Window Exclusion: Below 200 kV
Problem Statement:
 AEP-VD1160, AEP-VD1161.

In the 2025 Winter RTEP case, voltage drop violations at New Camp 69kV in the event of an N-1-1 scenario that involves the loss 138/69 kV transformer at Johns Creek and loss of Inez - Sprigg 138kV line.



Source: [20201218-item-04-reliability-analysis-update.ashx \(pjm.com\)](https://www.pjm.com/20201218-item-04-reliability-analysis-update.ashx)



AEP Transmission Zone: Baseline New Camp - Stone 69kV

Proposed Solution:

Construct ~ 2.75 mi Orinoco - Stone 69kV transmission line in the clear between Orinoco station and Stone station. **Estimated Transmission Cost: \$9.23 M**

Construct ~ 3.25 mi Orinoco – New Camp 69kV transmission line in the clear between Orinoco station and New Camp station. **Estimated Transmission Cost: \$9.95 M**

At Stone substation, Circuit breaker A to remain in place and be utilized as T1 low side breaker, Circuit Breaker B to remain in place and be utilized as new Hatfield (via Orinoco and New Camp) 69KV line breaker. Add new 69KV Circuit Breaker E for Coleman Line exit. **Estimated Transmission Cost: \$0.66 M**

Reconfigure the New Camp tap which includes access road improvements/installation, temporary wire and permanent wire work along with dead end structures installation. **Estimated Transmission Cost: \$0.45 M**

At New Camp substation, rebuild the 69kV bus, add 69KV MOAB W and replace the 69KV Ground switch Z1 with a 69kV Circuit Switcher on the New Camp Transformer. **Estimated Transmission Cost: \$1.18 M**

Total estimated baseline Cost: \$21.47 M

Preliminary Facility Rating:

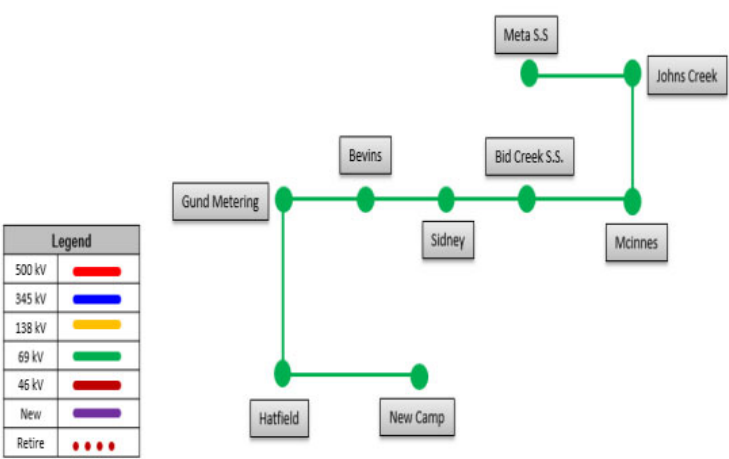
Branch	SN/SE/WN/WE (MVA)
05ORINOCO – 05STONE 69KV	102/142/129/160
05ORINOCO – 05NEWCAMP 69KV	102/142/129/150

Source: [20201218-item-04-reliability-analysis-update.ashx \(pjm.com\)](https://www.pjm.com/20201218-item-04-reliability-analysis-update.ashx)

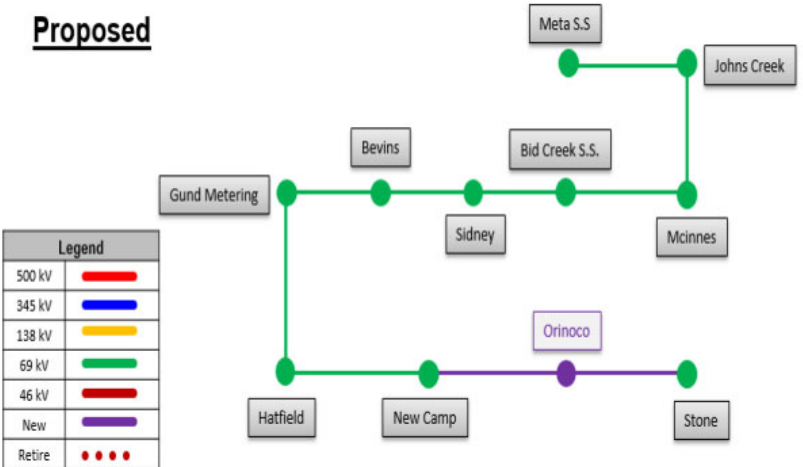


AEP Transmission Zone: Baseline New Camp - Stone 69kV

Existing



Proposed



Ancillary Benefits:

This work addresses the needs identified in AEP-2020-AP028. Removal of obsolete ~8.23 mi of 46kV transmission line, Looped service to New Camp station which is served via a radial ~4.14 mile, 69 kV line from Hatfield Station and serves approximately 14.6 MVA of peak load..

Alternatives: Install 28.8 MVAR Cap Bank at Johns Creek substation to address the baseline violations. Cost : \$0.368 M

Required In-Service: 12/1/2025

Source: [20201218-item-04-reliability-analysis-update.ashx \(pjm.com\)](https://www.pjm.com/20201218-item-04-reliability-analysis-update.ashx)



AEP Transmission Zone: Baseline New Camp - Stone 69kV

Process Stage: Recommended Solution

Criteria: AEP 715 criteria

Assumption Reference: 2025 RTEP assumption

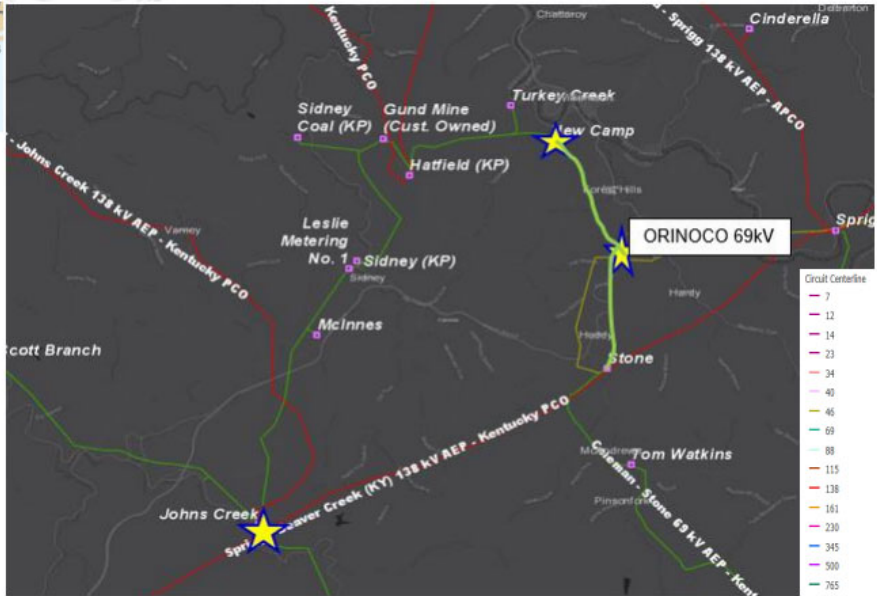
Model Used for Analysis: 2025 RTEP cases

Proposal Window Exclusion: Below 200 kV

Problem Statement:

AEP-VD1160, AEP-VD1161.

In the 2025 Winter RTEP case, voltage drop violations at New Camp 69kV in the event of an N-1-1 scenario that involves the loss 138/69 kV transformer at Johns Creek and loss of Inez - Sprigg 138kV line.



Source: <https://www.pjm.com/-/media/committees-groups/committees/srrtep-w/2021/20210115/20210115-reliability-analysis-update.ashx>



AEP Transmission Zone: Baseline New Camp - Stone 69kV

Recommended Solution:

Construct ~ 2.75 mi Orinoco - Stone 69kV transmission line in the clear between Orinoco station and Stone station. **(B3288.1) Estimated**

Transmission Cost: \$9.23 M

Construct ~ 3.25 mi Orinoco – New Camp 69kV transmission line in the clear between Orinoco station and New Camp station. **(B3288.2) Estimated**

Transmission Cost: \$9.95 M

At Stone substation, Circuit breaker A to remain in place and be utilized as T1 low side breaker, Circuit Breaker B to remain in place and be utilized as new Hatfield (via Orinoco and New Camp) 69KV line breaker. Add new 69KV Circuit Breaker E for Coleman Line exit. **(B3288.3) Estimated**

Transmission Cost: \$0.66 M

Reconfigure the New Camp tap which includes access road improvements/installation, temporary wire and permanent wire work along with dead end structures installation. **(B3288.4) Estimated Transmission Cost: \$0.45 M**

At New Camp substation, rebuild the 69kV bus, add 69KV MOAB W and replace the 69KV Ground switch Z1 with a 69kV Circuit Switcher on the New Camp Transformer. **(B3288.5) Estimated Transmission Cost: \$1.18 M**

Total estimated baseline Cost: \$21.47 M

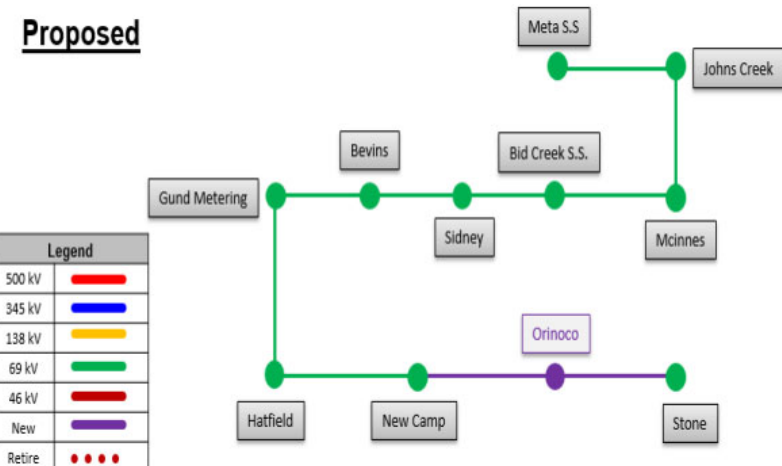
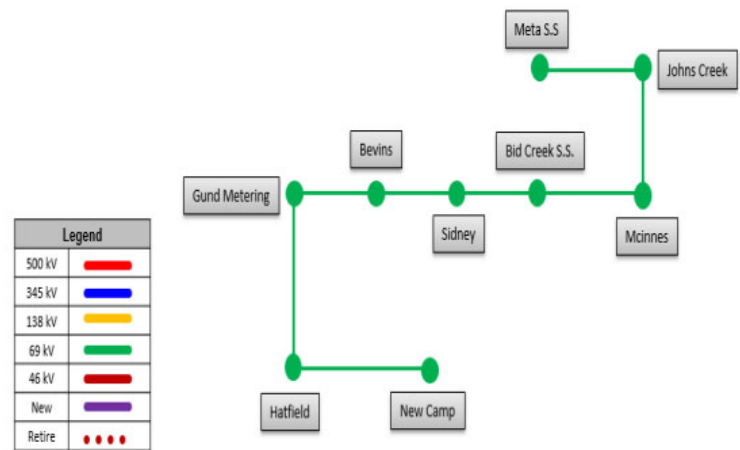
Preliminary Facility Rating:

Branch	SN/SE/WN/WE (MVA)
05ORINOCO – 05STONE 69KV	102/142/129/160
05ORINOCO – 05NEWCAMP 69KV	102/142/129/150

Source: <https://www.pjm.com/-/media/committees-groups/committees/srrtep-w/2021/20210115/20210115-reliability-analysis-update.ashx>



AEP Transmission Zone: Baseline New Camp - Stone 69kV



Ancillary Benefits:

This work addresses the needs identified in AEP-2020-AP028. Removal of obsolete ~8.23 mi of 46kV transmission line, Looped service to New Camp station which is served via a radial ~4.14 mile, 69 kV line from Hatfield Station and serves approximately 14.6 MVA of peak load..

Required In-Service: 12/1/2025

Projected In-Service: 12/1/2025

Previously Presented: 12/18/2020

Source: <https://www.pjm.com/-/media/committees-groups/committees/srrtep-w/2021/20210115/20210115-reliability-analysis-update.aspx>

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DATA REQUEST

KPSC 1_34 Explain if the recent flooding in Eastern Kentucky affected the proposed route in this matter. If not, explain whether Kentucky Power considered making any additional changes to this project based on the damage caused by the recent flooding.

RESPONSE

Kentucky Power is not aware of substantial damage as a result of the recent flooding, which would alter the location of the Proposed Route. The proposed transmission line was sited along ridgetops and other upland locations to the extent feasible. The intervening valleys where floodplains are located will be spanned. The existing New Camp and Stone Substations were not affected by the recent flooding, and the Orinoco Substation site is located outside of the 100-year floodplain.

Witness: George T. Reese

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DATA REQUEST

KPSC 1_35 Explain whether Kentucky Power considered updating its Siting Study to include additional or new factors based on the destruction and information learned from the recent Eastern Kentucky flooding. If not, explain why.

RESPONSE

The Siting process would not be affected by the recent flooding. One-hundred year floodplains and floodways, as mapped by the Federal Emergency Management Agency, were considered as part of the Project siting process. Kentucky Power selected Alternative Routes that minimized crossings of floodplains and floodways. As noted on Table 1 in the Siting Study (Application, Exhibit 10, page 15 of 92), the Proposed Route (consisting of Alternative Routes C and E) minimizes the extent of floodplains within the ROW. Floodplains will be spanned and no structures are anticipated to be within in the mapped floodplain or floodway. The Orinoco Substation site was selected to avoid the 100-year floodplain (Application, Exhibit 10, page 37 of 92). The existing New Camp and Stone Substations were not affected by the recent flooding.

Witness: George T. Reese

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DATA REQUEST

KPSC 1_36 Refer to the Application, Exhibit 10, Attachment H, page 80 of 92. Currently, the Stone-Sprigg 46 kV line and the Sprigg-Beaver Creek 138 kV circuit both connect substations located in Kentucky and West Virginia. Other than monitoring the energy flows and load in order to maintain the operational integrity of the transmission system, explain whether the energy flows between the substations represent specific transactions between Kentucky Power and Appalachian Power, both affiliates of AEP. If so, explain how each transaction is determined.

RESPONSE

The energy flows between the substations do not represent specific transactions between Kentucky Power and Appalachian Power.

Witness: Brian K. West

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DATA REQUEST

- KPSC 1_37** Refer to the Application, Exhibit 10, Map 3, page 47. In reference to the Stone-Sprigg (KY) 46 kV transmission line and the Sprigg-Beaver Creek (KY) 138 kV transmission line, provide the following information:
- a. An explanation as to how the energy flows and operational loads are measured and attributed to Kentucky Power and Appalachian Power.
 - b. A detailed analysis of how the energy cost is attributed to Kentucky Power or Appalachian Power for purposes of ratemaking.
 - c. Explain how line losses are calculated on transmission lines connecting substations belonging to Kentucky Power and the other individual state(s).

RESPONSE

a. Energy flow across each tie-line is netted with all other tie-lines to determine a “net interchange” of energy between each operating company transmission system and the rest of the PJM transmission system. Such net interchange is combined with the Net Generation within each company to determine the energy transported by each company’s transmission system.

b. Kentucky Power and Appalachian Power are parties to that certain Power Coordination agreement effective June 15, 2015 filed in Docket ER15-1443-000 under which the companies, along with affiliates Indiana Michigan Power Company and Wheeling Power Company work together to achieve efficiencies and economic benefits through (a) participation in the organized power markets of PJM and (b) allocation of off-system sales and purchases with other parties on bases that fairly assign or allocate the costs and benefits of these transactions.

c. Line losses are calculated pursuant to the PJM OATT. Please see KPCO_R_KPSC_1_37_Attachment1 for an explanation. (See <https://etariff.ferc.gov/TariffSectionDetails.aspx?tid=1731&sid=230553> for the online location of the information attached as KPCO_R_KPSC_1_37_Attachment1).

Witness: Brian K. West

5.4 Transmission Loss Charge Calculation.

5.4.1 Calculation by Office of the Interconnection.

The Office of the Interconnection shall calculate Transmission Loss Charges for each Network Service User, Market Participant in the PJM Interchange Energy Market, and each Transmission Customer.

5.4.2 General.

- (a) The basis for the Transmission Loss Charges shall be the differences in the Locational Marginal Prices, defined as the Loss Price at a bus, between points of delivery and points of receipt, as determined in accordance with Section 2 of this Schedule.
- (b) The Office of the Interconnection shall calculate Loss Prices in the form of Day-ahead Loss Prices and Real-time Loss Prices for the PJM Region, in accordance with Section 2 of this Schedule.
- (c) If a dollar-per-MW-hour value is applied in a calculation under this section 5.4 where the interval of the value produced in that calculation is less than an hour, then for purposes of that calculation the dollar-per-MW hour value is divided by the number of Real-time Settlement Intervals in the hour.

5.4.3 Network Service User and Market Participant Calculations.

- (a) Each Network Service User shall be charged for the increased cost of transmission losses to deliver the output of its firm Capacity Resources or other owned or contracted for resources, its firm bilateral purchases, and its non-firm bilateral purchases.
- (b) For each Day-ahead Settlement Interval, Market Participants shall be charged for transmission losses resulting from all Market Participant Energy Withdrawals scheduled in the Day-ahead Energy Market at the Day-ahead Loss Price applicable to each relevant location at which both the Market Participant withdraws energy and such energy is priced.
- (c) For each Day-ahead Settlement Interval, Market Participants shall be reimbursed for transmission losses resulting from all Market Participant Energy Injections scheduled in the Day-ahead Energy Market at the Day-ahead Loss Price applicable to each relevant location at which both the Market Participant injects energy and such energy is priced.
- (d) The day-ahead component of a Market Participant's Transmission Loss Charge is equal to the difference between the total day-ahead transmission loss withdrawal charge calculated in paragraph (b) and the total day-ahead transmission loss injection credit calculated in paragraph (c).
- (e) (i) The amount of energy delivered at each generation bus is determined by revenue meter data, if available, or by the State Estimator, if revenue meter data is not available.

The total load actually served at each load bus is initially determined by the State Estimator. For each Electric Distributor that reports hourly net energy flows from metered Tie Lines and for which all generators within the Electric Distributor's territory report revenue quality, hourly net energy delivered, the total revenue meter load within the Electric Distributor's territory is calculated as the sum of all net import energy flows reported by their tie revenue meters and all net generation reported via generator revenue meters. The amount of load at each of such Electric Distributor's load buses calculated by the State Estimator is then adjusted, in proportion to its share of the total load of that Electric Distributor, in order that the total amount of load across all of the Electric Distributor's load buses matches its total revenue meter calculated load.

(ii) To determine the amount of load served by each LSE in an Electric Distributor's territory, PJM Settlement utilizes the information submitted into PJM's internal energy scheduling tool by LSEs and Electric Distributors for their respective load contracts, including the names of the LSE responsible for serving the load and the Electric Distributor in whose territory the load is located, the number of megawatts of load assigned to the LSE for each hour, the Energy Settlement Area at which load is to be priced, and the start and end dates for the load contract. During the settlements process, load assigned to an LSE at a specified Energy Settlement Area is further assigned to individual load buses included in the Energy Settlement Area, based on the definition for the Energy Settlement Area as defined in Section 31.7 of the PJM Tariff, which specifies the percentage of the Energy Settlement Area that each bus represents, to identify the LSE's hourly megawatts of load at each bus. All megawatts of load assigned to LSEs in an Electric Distributor's territory as described herein are subtracted from the total megawatts of load for which the Electric Distributor is responsible as determined in subsection (e)(i) above.

(iii) Electric Distributors that hold POLR auctions or similar load auctions may direct PJM to automatically assign megawatt hours for which the Electric Distributor is responsible, as determined in subsection (e)(ii) above, to the POLR Suppliers based on the tranches the POLR Suppliers won in the auction, as a billing service, based on their contracts associated with the POLR load programs. In such case, the POLR Supplier's share of load shall be determined by multiplying the megawatt hours at each bus that were not specifically assigned under load contracts by the percentage of load won by the POLR Supplier in proportion to its share of the total POLR load of the Electric Distributor. This billing service may also apply to Electric Distributors and LSEs that mutually agree upon a transfer of load from the EDC to the LSE based upon a specified percentage of the megawatt hours at each bus that were not specifically assigned under load contracts.

(f) For each real-time Settlement Interval, Market Participants shall be assessed for transmission losses charges (positive or negative) in accordance with the following equation:

$$[(A - B) * C] - [(D - E) * C]$$

Where:

A = The Market Participant Energy Withdrawal megawatts in real-time at the location at which both the Market Participant withdraws energy and such energy is priced;

B = The Market Participant Energy Withdrawal megawatts in day-ahead at the location at which both the Market Participant withdraws energy and such energy is priced;

C = Real-time Loss Price;

D = The Market Participant Energy Injection megawatts in real-time at the location at which both the Market Participant injects energy and such energy is priced; and

E = The Market Participant Energy Injection megawatts in day-ahead at the location at which both the Market Participant injects energy and such energy is priced.

(g) The Revenue Data for Settlements determined for each Real-time Settlement Interval in accordance with section 3.1A of this Schedule shall be used in determining the real-time Market Participant Energy Withdrawals and Market Participant Energy Injections used to calculate transmission losses charges under subsection (f).

5.4.4 Transmission Customer Calculation.

Each Transmission Customer using Firm Point-to-Point Transmission Service (as defined in the PJM Tariff), each Network Customer, and each Transmission Customer using Non-Firm Point-to-Point Transmission Service (as defined in the PJM Tariff), shall be charged for the increased cost of transmission losses for the delivery of energy using such Transmission Service.

- (a) For each Day-ahead Settlement Interval, Transmission Loss Charges shall be assessed for transmission use scheduled in the Day-ahead Energy Market, calculated as the scheduled amount to be delivered multiplied by the difference between the Day-ahead Loss Price at the delivery point or the delivery interface at the boundary of the PJM Region and the Day-ahead Loss Price at the source point or the source interface at the boundary of the PJM Region.
- (b) For each Real-time Settlement Interval, Transmission Loss Charges shall be assessed for real-time transmission use in excess of the amounts scheduled for the applicable interval in the Day-ahead Energy Market, calculated as the excess amount multiplied by the difference between the Real-time Loss Price at the delivery point or the delivery interface at the boundary of the PJM Region, and the Real-time Loss Price at the source point or the source interface at the boundary of the PJM Region. For each Real-time Settlement Interval, a Transmission Customer shall be paid for Transmission Loss Charges for real-time transmission use falling below the amounts scheduled for the applicable interval in the Day-ahead Energy Market, calculated as the shortfall amount multiplied by the difference between the Real-time Loss Price at the delivery point or the delivery interface at the boundary of the PJM Region, and the Real-time Loss Price at the source point or the source interface at the boundary of the PJM Region or the source Interface Pricing Point at the boundary of the PJM Region.

5.4.4A Transaction Calculation.

Each Market Participant entering into transactions in the PJM Interchange Energy Market shall be charged for the increased cost of transmission losses on the scheduled path for the applicable interval.

- (a) For each Day-ahead Settlement Interval, Transmission Loss Charges shall be assessed for the transaction MWh scheduled in the Day-ahead Energy Market, calculated as the scheduled amount to be delivered multiplied by the difference between the Day-ahead Loss Price at the sink point and the Day-ahead Loss Price at the source point.
- (b) For each Real-time Settlement Interval, Transmission Loss Charges shall be assessed for real-time MWh in excess of the amounts scheduled for the applicable interval in the Day-ahead Energy Market, calculated as the excess amount multiplied by the difference between the Real-time Loss Price at the sink point and the real-time Loss Price at the source point. Such Market Participant shall be paid for Transmission Loss Charges for real-time MWh falling below the amounts scheduled for the applicable interval in the Day-ahead Energy Market, calculated as the shortfall amount multiplied by the difference between the Real-time Loss Price at the sink point and the Real-time Loss Price at the source point. The Revenue Data for Settlements determined for each Real-time Settlement Interval in accordance with section 3.1A of this Schedule shall be used in determining the real-time transactions used to calculate Transmission Loss Charges under this subsection (b).

5.4.5 Total Transmission Loss Charges.

The total Transmission Loss Charges collected by PJM Settlement each hour will be the aggregate net amounts determined as specified in this Schedule and in accordance with the PJM Manuals.

Kentucky Power Company
KPSC Case No. 2022-00236
Commission Staff's First Set of Data Requests
Dated September 22, 2022

DATA REQUEST

KPSC 1_38 State whether AEP Kentucky Transmission Company (Kentucky Transco) owns or operates any transmission lines in Kentucky.

RESPONSE

Kentucky Transco does not own or operate any transmission lines in Kentucky.

Witness: Brian K. West

Kentucky Power Company
KPSC Case No. 2022-00236
Commission Staff's First Set of Data Requests
Dated September 22, 2022

DATA REQUEST

KPSC 1_39 If Liberty Utilities Company consummates its purchase of Kentucky Power, explain whether the current arrangement in the assignment of costs between AEP affiliates for 46 kV, 69 kV, 138 kV, or 161 kV transmission lines that connect to substations in both Kentucky and another state will change. If so, provide a detailed explanation of how the assignment of costs will change.

RESPONSE

As an affiliate of AEP, Kentucky Power is allocated PJM network integration transmission service (NITS) costs on a 12CP basis pursuant to the AEP Transmission Agreement filed in Docket ER09-1279. If Liberty consummates its purchase of Kentucky Power, Kentucky Power would no longer be a party to the AEP Transmission Service Agreement (see Docket ER22-1429) and thus would be direct-billed by PJM for NITS costs on a 1CP basis pursuant to the PJM Tariff.

Witness: Brian K. West



Koehler Belfry Discovery Verification.doc

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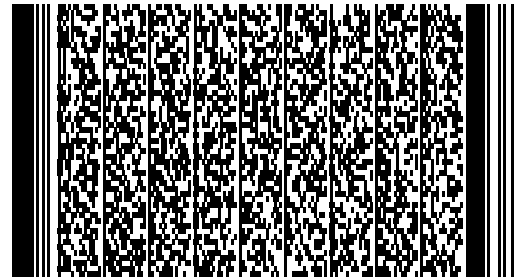
E-Signature Summary

E-Signature 1: Nicolas C Koehler (NCK)

October 03, 2022 10:07:04 -8:00 [0E9A5A62EDA2] [167.239.221.105]
 nckoehler@aep.com (Principal) (Personally Known)

E-Signature Notary: Jennifer Young (JAY)

October 03, 2022 10:07:04 -8:00 [26EC53133077] [167.239.221.104]
 jayoung1@aep.com
 I, Jennifer Young, did witness the participants named above electronically sign this document.



VERIFICATION

The undersigned, Nicolas C. Koehler, being duly sworn, deposes and says he is the Director of Transmission Planning for American Electric Power Service Corporation, that he has personal knowledge of the matters set forth in the forgoing responses, and the information contained therein is true and correct to the best of his information, knowledge and belief after reasonable inquiry.

Nicolas C Koehler
Signed on 2022/10/03 10:07:04 -8:00

Nicolas C. Koehler

Commonwealth of Kentucky)
)
County of Boyd)

Case No. 2022-00236

Subscribed and sworn to before me, a Notary Public in and before said County

and State, by Nicolas C. Koehler, on 10/03/2022.

JAY
Signed on 2022/10/03 10:07:04 -8:00

Notary Public

JENNIFER A. YOUNG
ONLINE NOTARY PUBLIC
STATE AT LARGE KENTUCKY
Commission # KYNP31964
My Commission Expires Jun 21, 2025
Notary Stamp 2022/10/03 10:07:04 PST 26EC3133077

Notarial act performed by audio-visual communication

My Commission Expires 06/21/2025

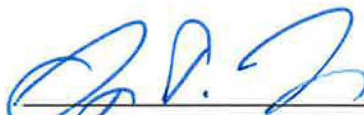
Notary ID Number KYNP31964

DE369E7C-6068-4254-A77F-24492E6E4634 --- 2022/10/03 05:12:34 -8:00 --- Remote Notary



VERIFICATION

The undersigned, George T. Reese, being duly sworn, deposes and says he is the Vice President, Business Sector Manager for Power Delivery – Environmental for GAI Consultants, Inc., that he has personal knowledge of the matters set forth in the forgoing responses, and the information contained therein is true and correct to the best of his information, knowledge and belief after reasonable inquiry.


George T. Reese

STATE OF PENNSYLVANIA

)
) Case No. 2022-00236
)

COUNTY OF ALLEGHENY

Subscribed and sworn to before me, a Notary Public in and before said County and State, by
George T. Reese, on 10/5/22.


Notary Public

Notary ID Number: 1185072

Commonwealth of Pennsylvania - Notary Seal
Donna Jean Zeno, Notary Public
Allegheny County
My commission expires April 17, 2026
Commission number 1185072
Member, Pennsylvania Association of Notaries

VERIFICATION

The undersigned, Brian K. West, being duly sworn, deposes and says he is the Vice President, Regulatory & Finance for Kentucky Power, that he has personal knowledge of the matters set forth in the foregoing responses and the information contained therein is true and correct to the best of his information, knowledge, and belief.

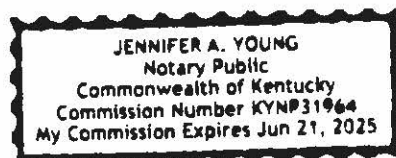


Brian K. West

Commonwealth of Kentucky)
) Case No. 2022-00236
County of Boyd)

Subscribed and sworn to before me, a Notary Public in and before said County and State, by Brian K. West, on October 3rd 2022.



Notary Public

My Commission Expires 6/21/25

Notary ID Number KYNP31964