

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

**In the Matter of:**

<b>ELECTRONIC APPLICATION OF EAST</b>	)	
<b>KENTUCKY POWER COOPERATIVE, INC. FOR</b>	)	
<b>A (1) CERTIFICATE OF PUBLIC CONVENIENCE</b>	)	<b>CASE NO.</b>
<b>AND NECESSITY FOR THE CONSTRUCTION OF</b>	)	<b>2022-00314</b>
<b>TRANSMISSION FACILITIES IN MADISON</b>	)	
<b>COUNTY, KENTUCKY; AND (2) DECLARATORY</b>	)	
<b>ORDER CONFIRMING THAT A CERTIFICATE OF</b>	)	
<b>PUBLIC CONVENIENCE AND NECESSITY IS</b>	)	
<b>NOT REQUIRED FOR CERTAIN FACILITIES</b>	)	

**RESPONSES TO STAFF'S SECOND INFORMATION REQUEST**  
**TO EAST KENTUCKY POWER COOPERATIVE, INC.**

**DATED 12/1/2022**

COMMONWEALTH OF KENTUCKY

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A (1) CERTIFICATE OF PUBLIC CONVIENCANCE )
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ORDER CONFIRMING THAT A CERTIFICATE OF )
PUBLIC CONVIENCANCE AND NECESSITY IS )
NOT REQUIRED FOR CERTAIN FACILITIES )

CASE NO.
2022-00314

CERTIFICATE

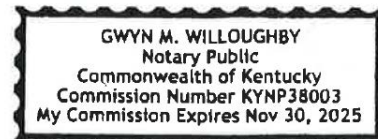
STATE OF KENTUCKY )
COUNTY OF CLARK )

Darrin Adams, being duly sworn, states that she he supervised the preparation of the
responses of East Kentucky Power Cooperative, Inc. to the Public Service Commission Staff's
Second Request for Information in the above-referenced case dated December 1, 2022, and that
the matters and things set forth therein are true and accurate to the best of his knowledge,
information and belief, formed after reasonable inquiry.

[Handwritten signature of Darrin Adams]

Subscribed and sworn before me on this 15th day of December 2022.

[Handwritten signature of Notary Public]



COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF EAST )
KENTUCKY POWER COOPERATIVE, INC. FOR )
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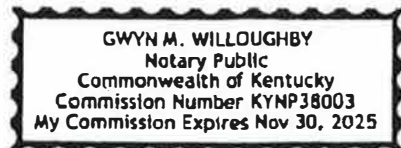
STATE OF KENTUCKY )
)
COUNTY OF CLARK )

Laura Lemaster, being duly sworn, states that she has supervised the preparation of the
responses of East Kentucky Power Cooperative, Inc. to the Public Service Commission
Staff's Second Request for Information in the above-referenced case dated December 1, 2022,
and that the matters and things set forth therein are true and accurate to the best of her knowledge,
information and belief, formed after reasonable inquiry.

[Handwritten signature of Laura Lemaster]

Subscribed and sworn before me on this 15th day of December 2022.

[Handwritten signature of Gwyn M. Willoughby]
Notary Public



**EAST KENTUCKY POWER COOPERATIVE, INC.**  
**CASE NO. 2022-00314**  
**SECOND REQUEST FOR INFORMATION RESPONSE**

**STAFF'S REQUEST DATED 12/1/2022**

**REQUEST 1**

**RESPONSIBLE PARTY:            Laura LeMaster**

**Request 1.**            Confirm that, but for the proposed 138 kV transmission line project, the EKPC Fawkes Expansion project would not be proposed

**Response 1.**

This is confirmed. The EKPC Fawkes Substation Expansion is required for the termination of the 138 kV transmission line on the north end.

**EAST KENTUCKY POWER COOPERATIVE, INC.**  
**CASE NO. 2022-00314**  
**SECOND REQUEST FOR INFORMATION RESPONSE**

**STAFF'S REQUEST DATED 12/1/2022**

**REQUEST 2**

**RESPONSIBLE PARTY:            Laura LeMaster**

**Request 2.**            Confirm that, but for the proposed 138 kV transmission line project, the Madison County 69 kV Switching Station project would not be proposed.

**Response 2.**

The Madison County 69 kV Switching Station is required to address existing reliability and system protection concerns on the 69 kV system as outlined in Darrin Adams' Testimony Page 12 Line 20 through Page 14 line 10, and as discussed in Data Request 1 Response 6.a. provided by Darrin Adams. Thus, the Madison County 69 kV Switching Station is planned to be constructed regardless of whether the proposed 138 kV transmission line project is approved.

**EAST KENTUCKY POWER COOPERATIVE, INC.**  
**CASE NO. 2022-00314**  
**SECOND REQUEST FOR INFORMATION RESPONSE**

**STAFF'S REQUEST DATED 12/1/2022**

**REQUEST 3**

**RESPONSIBLE PARTY:            Laura LeMaster**

**Request 3.**            Confirm that, but for the 138 kV transmission line project, the 138-69 kV step-down transformer project would not be proposed.

**Response 3.**

This is confirmed. The 138-69 kV step-down transformer project will be executed when the 69 kV system needs additional support. This project cannot be executed without the construction of a 138 kV transmission line, as proposed as part of the double circuit rebuild.

**EAST KENTUCKY POWER COOPERATIVE, INC.**  
**CASE NO. 2022-00314**  
**SECOND REQUEST FOR INFORMATION RESPONSE**

**STAFF'S REQUEST DATED 12/1/2022**

**REQUEST 4**

**RESPONSIBLE PARTY: Laura LeMaster**

**Request 4.** Confirm that, but for the 138 kV transmission line project, the New Industrial Substation project would not be proposed.

**Response 4.**

The New Industrial Substation is dependent on load growth in the area to the south of Richmond along the I-75 corridor. The industrial substation is anticipated to require the 138 kV line, and therefore would require the execution of the 138 kV transmission line as a double-circuit with the 69 kV line.

**EAST KENTUCKY POWER COOPERATIVE, INC.**  
**CASE NO. 2022-00314**  
**SECOND REQUEST FOR INFORMATION RESPONSE**

**STAFF'S REQUEST DATED 12/1/2022**

**REQUEST 5**

**RESPONSIBLE PARTY: Darrin Adams and Laura LeMaster**

**Request 5.** Refer to the Application, paragraph 18. Provide a detailed analysis and documented support for conclusion that the Fawkes Expansion, the Madison County Switching Station, placement of the step-down transformer and construction of the New Industrial Substation are extensions in the ordinary course of business, and therefore, the projects do not require a Certificate of Public Convenience and Necessity (CPCN).

**Response 5.**

The substation projects included in the Application, in which EKPC requests a declaratory order confirming that CPCNs are not required are as follows: (1) the expansion of the EKPC Fawkes substation ("Fawkes Expansion"); (2) construction of the Madison County 69 kV Switching Station near the Duncannon Lane Tap ("Madison County Switching Station"); (3) placement of a 138 kV to 69 kV step-down transformer; and (4) construction of a new substation to serve potential industrial customers (the "New Industrial Substation"). The Madison County Switching Station is needed due to existing reliability and system protection concerns, while the remaining projects will be needed in the reasonably foreseeable future to accommodate new load and provide a



regional transmission solution for the Madison County community. EKPC asserts that these projects are extensions of EKPC's existing systems in the ordinary course of business because they do not: (1) result in wasteful duplication of plant, equipment property, or facilities; (2) compete with existing certificates or service of other utilities; or (3) involve a sufficient capital outlay to materially affect the existing financial condition or require an increase in EKPC's wholesale rates to its owner-members.

EKPC strives to avoid the waste and unnecessary impact of short-sited, incremental planning in favor of a more holistic approach that in this case allows for incremental implementation of a sound area plan that captures economy of scale, minimizes impact to the community, assures reliability for existing local load, and supports imminent area load growth. Where possible, as is the case here, colocation is preferred. This area plan includes the execution of the Fawkes – Duncannon Lane rebuild as a 69 kV and 138 kV double-circuit, the Fawkes Expansion, the 138 kV to 69 kV step-down transformer at the Madison County Switching Station, and the New Industrial Substation.

EKPC has an obligation to provide reliable and efficient service to all existing and potential customers of our owner-members, which includes both upgrades necessary to provide reliable service as well as competent area planning. Planning and executing transmission infrastructure replacement or new construction is complicated by the pace of load growth, ever increasing coordination challenges for necessary outages, the impact of national and global supply chain problems, obligations to the Economic Development Cabinet and growing communities of the Commonwealth to provide strong and responsive support for their efforts to attract and retain quality industries, environmental compliance requirements, and regulatory processes, etc. Electric

utilities are constantly challenged to co-locate facilities, lessen disruption, and look for synergies and forward thinking in their infrastructure plans. EKPC has developed a sound, cost-efficient plan for maintaining adequate and reliable power to the Richmond/Madison County area while looking to the future and balancing the needs of the many constituencies who will be impacted. To do otherwise would make the Madison County community less ready to attract investment and job growth, impede efforts of economic development professionals to land projects, unnecessarily impact landowners who may be faced with two construction projects instead of a single project, and, ultimately, impose greater costs upon consumers.

As outlined in Response 15 to the Second Request for Information, EKPC has demonstrated why taking advantage of the opportunity to double-circuit with the proposed 138 kV as part of the rebuild of the existing 69 kV line will be the most economical solution. EKPC believes load growth in this part of Bluegrass Energy's service territory is imminent and the existing 69kV system won't handle it. The existing 69 kV Fawkes – Duncannon Lane transmission line is in poor condition and will also electrically overload as soon as winter 2022/2023. If EKPC is unable to move forward with the 138 kV transmission line and also have certainty with regard to whether the various substation projects will require a CPCN in the future, there will be significant local impacts in the near to mid-term. If the existing 69 kV transmission line is constructed without the 138 kV circuit, then either: (1) the new 69 kV transmission line would have to prematurely be rebuilt to accommodate the 138 kV line; or (2) the 138 kV transmission line will have to take an entirely different path, thereby burdening dozens of previously unaffected landowners. In the event of the first option, poles at less than 10% of their service life would be replaced with new structures causing new and unnecessary construction damages and unacceptable cost inefficiencies.

Additionally, some industrial load prospects will be deterred from locating at this prime location due to delays required to deliver the infrastructure necessary to support their loads and project development milestones, which is detrimental to the residents of this area and the state's economic development mission. EKPC acknowledges that the need for the 138 kV transmission line does not exist today, however, previously set precedent and Kentucky law does not require that.<sup>1</sup> EKPC is proactively looking forward, and there is an undeniable need within a reasonable planning horizon for this transmission line, which, when coupled with the obvious construction economies of scale, rate savings, and landowner impact avoidances, makes the CPCN for the 138 kV imminently reasonable and consistent with Kentucky law and Commission precedent.

In addition, none of the facilities will compete with existing certificates or service of other utilities. EKPC has conducted both desktop reviews and field surveys to ascertain the position of other utility service facilities within the vicinity of the proposed substation projects and confirmed that none of these projects will impede or prevent other utilities from carrying out their tasks. In particular, EKPC has already reached out to Kentucky Utilities Company ("KU") with regard to the work that will take place near KU's Fawkes Substation and confirmed that no conflict will develop. By virtue of the assignment of service territories to Kentucky's jurisdictional electric utilities, EKPC will only provide service to retail customers located within the service territory of

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<sup>1</sup> Although I am not an attorney, it is my understanding that Kentucky law supports the notion that the timeline for determining "need" for CPCN purposes is not strictly based upon the immediate circumstances, but also circumstances that are reasonably foreseeable. *See Kentucky Utilities Co. v. Pub. Serv. Comm'n*, 390 S.W.2d 168, 171 (Ky. 1965) ("The deficiency is not to be measured by the needs of the particular instant, but by 'immediately foreseeable needs' Clearly, in view of the substantial period of time required to construct and place in operation a major electric service facility, the immediately foreseeable future may embrace a number of years."). EKPC's counsel can provide additional legal support for this premise through a written brief if that would assist the Commission.

its owner-member, Blue Grass Energy. None of the proposed substation projects will interfere with the service of any other utility.

Moreover, the cost to construct and operate these projects will not materially affect EKPC's financial condition. Furthermore, EKPC's wholesale rates to its owner-members will not be increased because of the project. As stated by Tom Stachnik in the First Request for information, Response 5, the net book value of EKPC's net utility plant was estimated at \$3.0 billion as of December 31, 2021. The total estimated construction cost of the Madison County 69 kV Switching Station is \$7.5 million and represents 0.25% of EKPC's net utility plant. The addition of the 138 - 69 kV Step Down at the Madison County 69 kV Switching Station has estimated incremental construction cost of \$9 million and represents 0.3% of EKPC's net utility plant; the estimated cost of the Fawkes Expansion is \$11.5 million representing 0.38% of EKPC's net utility plant; and the New Industrial Substation is estimated to range between \$13 million to \$19 million, representing 0.43% to 0.63% of EKPC's net utility plant. Though each project should be reviewed individually, and the reality is that the investments will be made over multiple years, even when they are aggregated together, the total capital investment is still less than 1.5% of EKPC net utility plant. EKPC intends to finance the projects out of internally available funds and eventually roll them into long-term debt finance by the Rural Utilities Service. These investments will not cause EKPC to seek an increase in its rates. Therefore, none of the facilities require EKPC to have a sufficient capital outlay to materially affect the existing financial condition or require an increase to EKPC's wholesale power rates to owner-members.

**EAST KENTUCKY POWER COOPERATIVE, INC.**  
**CASE NO. 2022-00314**  
**SECOND REQUEST FOR INFORMATION RESPONSE**

**STAFF'S REQUEST DATED 12/1/2022**

**REQUEST 6**

**RESPONSIBLE PARTY: Laura LeMaster**

**Request 6.** Refer to the Application, Exhibit 14. The letter references an open house that occurred on September 22, 2022. Provide information regarding the public meeting. Include how the public meeting was advertised, the attendance, and whether any information about the additional projects in the Application were presented. Include any landowner concerns that were raised at the meeting. Also, include any materials that were distributed or a PDF of any presentation materials.

**Response 6.**

EKPC held a Public Meeting on September 20, 2022, from 3:00 to 7:00 p.m. at the Best Western in Richmond, Kentucky. A mailer, including a letter to each property owner and an informational packet, was sent to all impacted property owners along the Fawkes – Duncannon Lane Tap 69 kV rebuild as a 138 kV and 69 kV double-circuit transmission line, and an advertisement was published in the Richmond Register on September 10<sup>th</sup>, 13<sup>th</sup>, and 15<sup>th</sup>. The property owner letter and the informational packet provided via mail to property owners and the newspaper ad for the open house are attached. EKPC employees were in attendance at the open house to discuss all

aspects of the project with property owners who attended. This contingent included transmission engineers, construction experts, EMF experts, environmental experts and right-of-way agents. EKPC utilized maps of the proposed centerline for discussion with property owners during the open house, those maps are attached. Photos of similar structures were also used to help property owners visualize the steel poles. Those photos are attached. During and after the open house, all EKPC employees captured conversations and concerns voiced by property owners in the attached comment sheets. EKPC provides a survey to all property owners who attend the open house to allow them to provide feedback and any additional concerns. Attached is a spreadsheet recapping all survey responses received.



September 2, 2022

University Church Of Christ  
461 Tobiano Drive  
Richmond KY 40475

Subject: Fawkes-Duncannon transmission line rebuild project

East Kentucky Power Cooperative (EKPC) soon will conduct a project in Madison County, Ky., to rebuild an existing 69-kilovolt electric transmission line as a 138-kilovolt and 69-kilovolt double-circuit electric transmission line.

The line will extend approximately 7 miles from EKPC's Fawkes Substation, near the intersection of Goggins Lane and Tates Creek Road, southeast to a location near Parrish Road and Duncannon Lane. EKPC plans to utilize the existing 100 feet of right-of-way for the rebuilt transmission line. This project will help to maintain reliable electric service for Blue Grass Energy members and provide voltage support for growing commercial and industrial electric load in the area.

You are being contacted because records on file with the local property valuation administrator's office indicate you own property that will be affected by this project.

EKPC would like to hear your comments about this project. You are invited to an open house on **Tuesday, Sept. 20, 2022, from 3 p.m. to 7 p.m. Best Western Richmond, 100 Eastern Bypass in Richmond, Ky.** The open house format is informal and there will not be any speeches. You will be able to talk one-on-one with people from EKPC who are involved with the project. You can attend any time during the scheduled hours of the open house so we can hear from you and exchange information.

Enclosed are some informational materials about EKPC, our typical process for transmission lines and this specific project. You may want to read over these materials prior to our visit.

Please make arrangements to drop by and talk with us. We look forward to meeting you.

Sincerely,

A handwritten signature in black ink, appearing to read "Bill Sharp", is written over a light blue circular stamp.

Bill Sharp  
Land Acquisition Program Manager

# Fawkes - Duncannon

Transmission line project



**EAST KENTUCKY  
POWER COOPERATIVE**

A Touchstone Energy Cooperative 







## About Our Open House

Local property owners are encouraged to attend our Open House to help us gather information.

The Open House is a key way we keep property owners involved and informed every step of the way when building a transmission line.

Thank you for your cooperation as we work together.

## About This Project

### **About the Fawkes – Duncannon transmission line rebuild project.**

This is a project to rebuild approximately 7 miles of an existing 69-kilovolt (kV) electrical transmission line. The existing 69-kV line will be rebuilt as a 138-kilovolt and 69-kilovolt double-circuit electric transmission line. East Kentucky Power Cooperative (EKPC) plans to utilize the existing 100 feet of right-of-way for the transmission line.

### **Why does EKPC need to build this particular line?**

This project will help to maintain reliable electric service for Blue Grass Energy members and provide voltage support for growing commercial and industrial electric load in the area.

### **What approvals must be secured for this project?**

The Kentucky Public Service Commission (PSC) must grant a certificate of public convenience and necessity for a portion of this project. EKPC will provide notice to the directly impacted property owners regarding the PSC docket number and contact information.

The Rural Utilities Service, an agency that administers the U.S. Department of Agriculture's Rural Development Programs (USDA Rural Development), must ensure that EKPC meets appropriate environmental obligations including compliance with the National Environmental Policy Act, the National Historic Preservation Act and the Endangered Species Act.

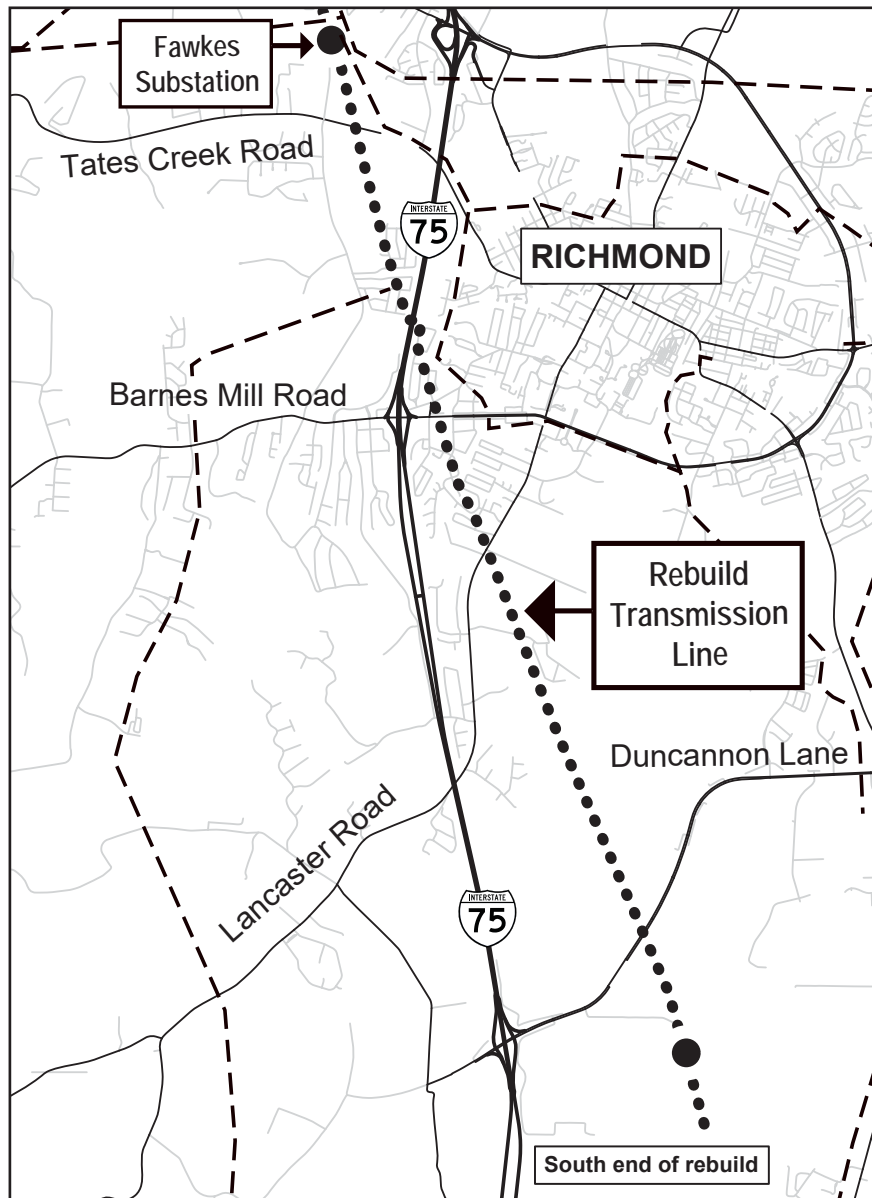




## Line Location

### Where will the line be located?

EKPC plans to rebuild an existing 69-kV electric transmission line in Madison County as a 138-kV and 69-kV double-circuit line. The existing line to be rebuilt extends from EKPC's Fawkes Substation, near the intersection of Goggins Lane and Tates Creek Road, southeast to a location near Parrish Road and Duncannon Lane.

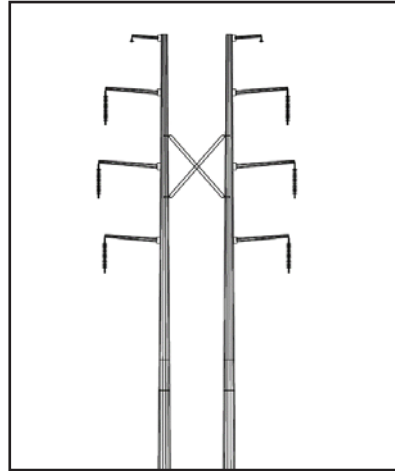
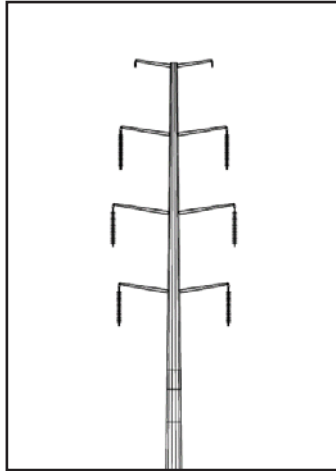




## Line Appearance

### What will the line look like?

This project will use a mix of single- and double-pole construction. Below are drawings of the typical structures that will be used for the project. EKPC plans to use galvanized steel poles for this project.



## Project Schedule

Open House conducted	September 20, 2022
Corridor mapping/surveying	October to December 2022
Right-of-way negotiations	October 2022 to May 2023
Design activity	Through 2022
Structure stakeout	Beginning June 2023
Construction	Fall 2023 to August 2024





## About Us

Winchester-based East Kentucky Power Cooperative is a not-for-profit electric utility that generates and transmits energy to 16 Touchstone Energy Cooperatives across the state. These cooperatives distribute the energy to more than 1.1 million people in Kentucky. Together, we work to improve the quality of life of those we serve



### What a cooperative is

A cooperative is a not-for-profit business that is owned and democratically governed by its members. A co-op exists solely to serve its members.

### What “not-for-profit” means

A not-for-profit cooperative is in business for the public good rather than for the financial benefit of an individual owner or stockholders.

### Why we build power lines

Power lines are built to keep pace with growth in Kentucky. Power lines transport electricity like roads carry traffic. If there is too much traffic on a power line, though, the line overloads and people lose power. We build lines to avoid that problem.

### Why we can't bury lines

While burying lines is more pleasing to the eye and protects them from ice and weather, the cost of burying lines is prohibitive. Line repairs are also extremely difficult and time consuming. It can cost as much as 10 times more to construct underground transmission lines.



**The process we use to build lines**

After the Open House, affected property owners will be notified. If your property is affected, we will seek permission to conduct a survey to confirm the centerline. If EKPC does not already have appropriate property rights, negotiations then begin on a payment to affected landowners for the right to run the line across their land. Our goal is always to minimize costs and the impact upon you and your community.

**About rights of way**

If your property is crossed by this project and EKPC does not already have an appropriate easement, EKPC will seek to purchase an easement that allows the cooperative to locate its poles and wires on your property, and to enter the property as needed for maintenance.

**The property owner will continue to own and use the property**

The easement allows EKPC to clear and control trees and vegetation within the right-of-way, as well as other trees that could interfere with transmission lines, and prevents structures from being constructed in the right-of-way.

**How we work with property owners**

Our professionals will work with you respectfully, and we will work closely with each property owner who is affected by any phase of the construction. It is our goal to make sure that property owners are well-informed about the project and have ample opportunity to discuss it with us.

**What about environmental impacts?**

Our biologists do extensive work prior to project construction in order to assess the environmental impact of a project. The biologists work to ensure EKPC minimizes and avoids impacting endangered plants and animals during line construction.

**How property owners and local communities provide input**

Pursuant to Section 106 of the National Historic Preservation Act of 1966, East Kentucky Power Cooperative, on behalf of USDA Rural Utilities Service, is seeking to identify persons who are interested in participating in the process for evaluating the potential effects of this proposed project on historic properties located in the project area that are listed or eligible for listing in the National Register of Historic Places. If you have a legal or economic relation to properties that will be affected by the proposed project, or if you have a demonstrable interest in the historic built and/or archaeological environment in the project area, you are invited to participate as a consulting party in the Section 106 review process. If you believe you meet these criteria and you wish to participate as a consulting party, please send a letter with your contact information and a statement of your specific interest in the historic properties review process, to Josh Young at [josh.young@ekpc.coop](mailto:josh.young@ekpc.coop) or at East Kentucky Power Cooperative, 4775 Lexington Road, Winchester, KY 40391.





## About Our System

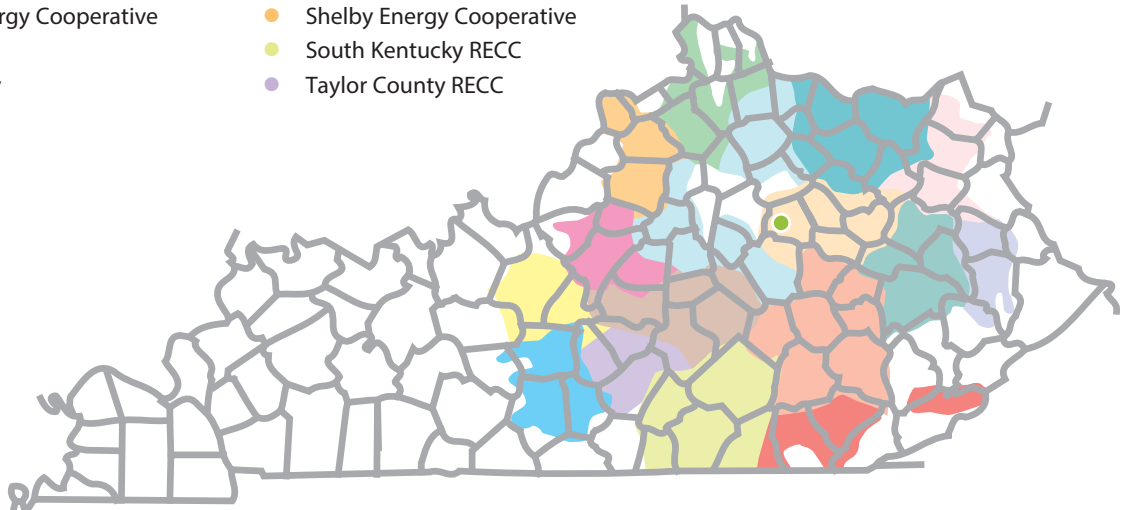
### East Kentucky Power Cooperative Service area

EKPC is a not-for-profit generation and transmission utility with headquarters in Winchester. EKPC generates electric power and transports it to 16 locally-owned cooperatives that distribute it to homes, farms, businesses and industries in 87 Kentucky counties, serving 1.1 million people. Together, EKPC and its owner-member cooperatives are known as Kentucky's Touchstone Energy Cooperatives.

EKPC's 16 owner-member cooperatives include:

- Big Sandy RECC
- Blue Grass Energy Cooperative
- Clark Energy Cooperative
- Cumberland Valley Electric
- Farmers RECC
- Fleming-Mason Energy Cooperative
- Grayson RECC
- Inter-County Energy
- Jackson Energy Cooperative
- Licking Valley RECC
- Nolin RECC
- Owen Electric Cooperative
- Salt River Electric Cooperative
- Shelby Energy Cooperative
- South Kentucky RECC
- Taylor County RECC

● EKPC headquarters





**EAST KENTUCKY  
POWER COOPERATIVE**

A Touchstone Energy Cooperative 

4775 Lexington Road, 40391

P.O. Box 707,

Winchester, KY 40392-0707

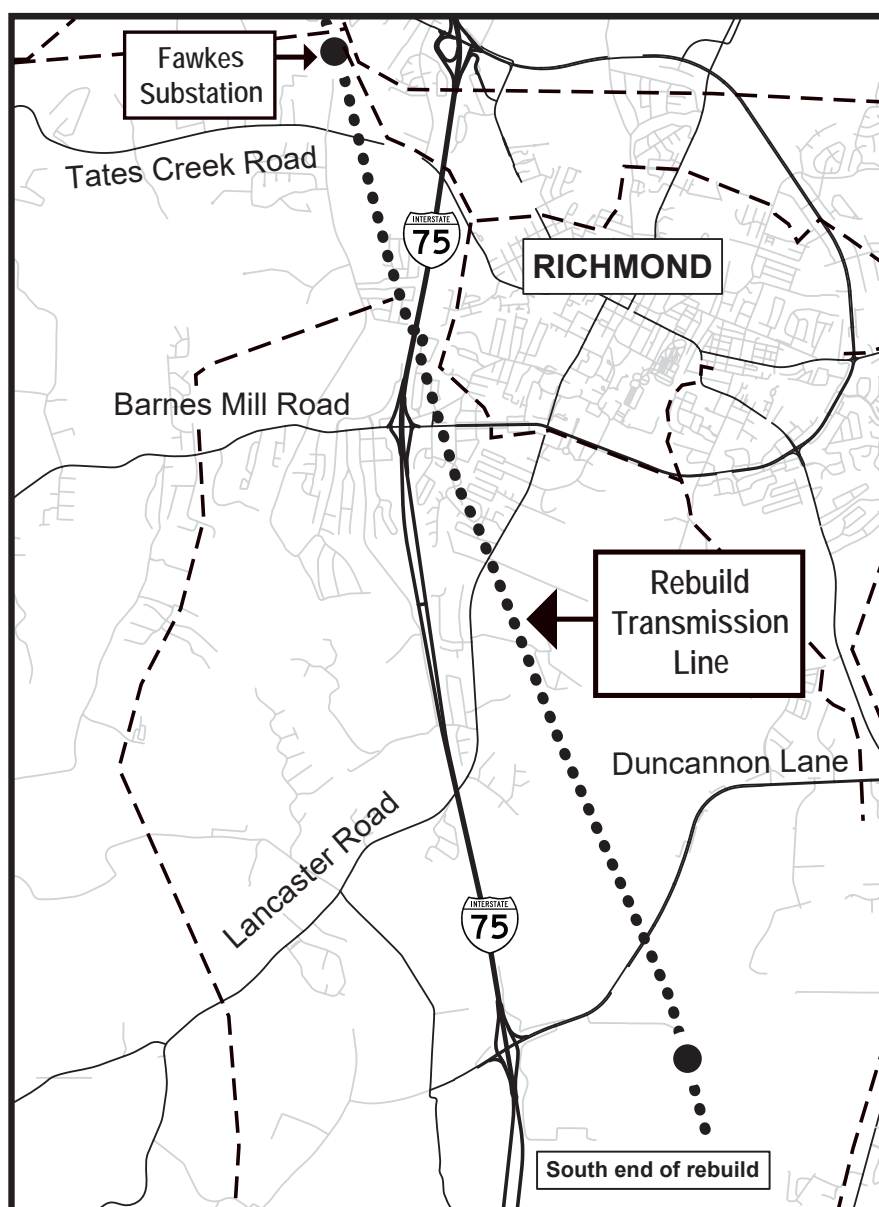
Telephone: 859-744-4812

Fax: 859-744-6008

[www.ekpc.coop](http://www.ekpc.coop)



# We want you involved ...



... to learn more about a project to rebuild an existing 69-kilovolt electric transmission line in Madison County. This project will involve rebuilding approximately 7 miles of existing 69-kilovolt electric transmission line as a 138-kilovolt and 69-kilovolt double-circuit electric transmission line. The line will be located along the route shown on the map above.

**A public open house will be held Tuesday, Sept. 20, 2022, from 3 p.m. to 7 p.m. at the Best Western Richmond, 100 Eastern Bypass in Richmond, Ky.**

During the open house, we will provide information about this project to help maintain reliable electric service for Blue Grass Energy members and provide voltage support for growing commercial and industrial electric load in the area.

*Pursuant to Section 106 of the National Historic Preservation Act of 1966, East Kentucky Power Cooperative, on behalf of USDA Rural Utilities Service, is seeking to identify persons who are interested in participating in the process for evaluating the potential effects of this proposed project on historic properties located in the project area that are listed or eligible for listing in the National Register of Historic Places. If you have a legal or economic relation to properties that will be affected by the proposed project, or if you have a demonstrable interest in the historic built and/or archaeological environment in the project area, you are invited to participate as a consulting party in the Section 106 review process. If you believe you meet these criteria and you wish to participate as a consulting party, please send a letter with your contact information and a statement of your specific interest in the historic properties review process, to Josh Young at [josh.young@ekpc.coop](mailto:josh.young@ekpc.coop) or at East Kentucky Power Cooperative, 4775 Lexington Road, Winchester, KY 40391.*

 **EAST KENTUCKY POWER COOPERATIVE**

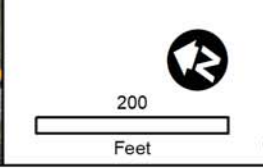
A Touchstone Energy Cooperative 



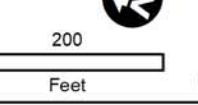


### Fawkes - Duncannon Lane Transmission Line Project

Open House Map



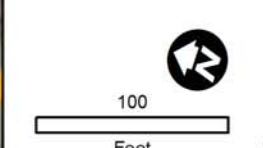
East Kentucky Power Cooperative  
4775 Lexington Road, PO Box 707  
Winchester, Kentucky 40392  
Phone (859) 744-4612 www.ekpc.coop Fax (859) 744-6008





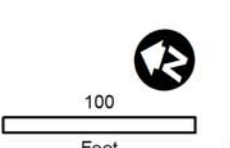
### Fawkes - Duncannon Lane Transmission Line Project

Open House Map





Fawkes - Duncannon Lane  
Transmission Line Project  
Open House Map

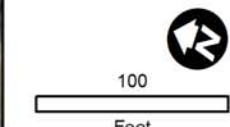


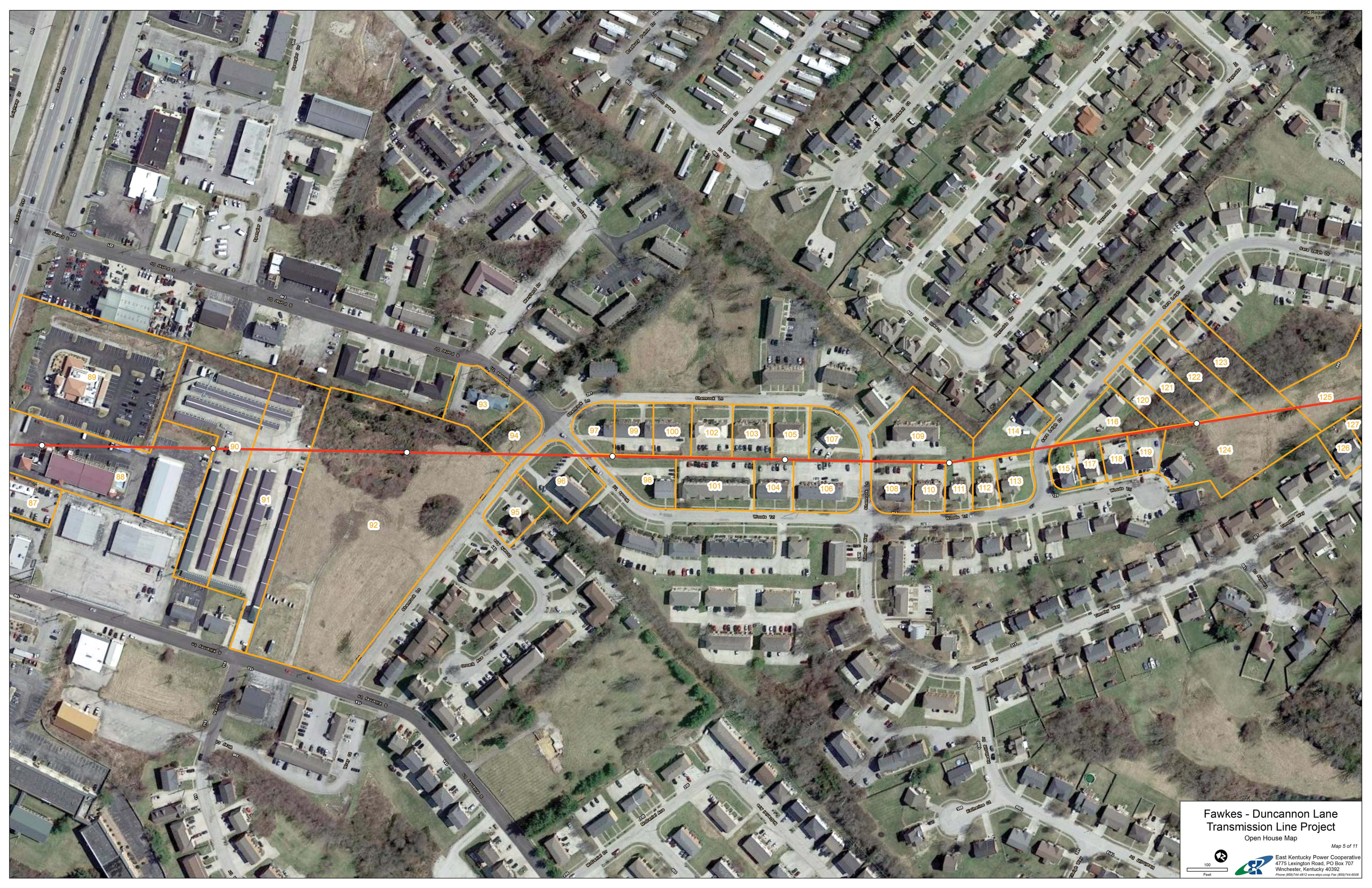
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East Kentucky Power Cooperative  
4775 Lexington Road, PO Box 707  
Winchester, Kentucky 40392  
Phone (859) 744-4812 www.ekpc.coop Fax (859) 744-8008



Fawkes - Duncannon Lane  
Transmission Line Project  
Open House Map



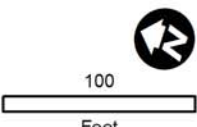


### Fawkes - Duncannon Lane Transmission Line Project

Open House Map



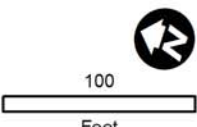
Fawkes - Duncannon Lane  
Transmission Line Project  
Open House Map



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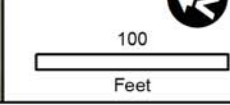


**Fawkes - Duncannon Lane  
Transmission Line Project**  
Open House Map





**Fawkes - Duncannon Lane  
Transmission Line Project**  
Open House Map



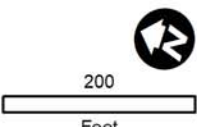




**Fawkes - Duncannon Lane  
Transmission Line Project**  
Open House Map

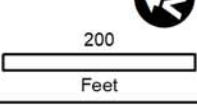


**Fawkes - Duncannon Lane  
Transmission Line Project**  
Open House Map





Fawkes - Duncannon Lane  
Transmission Line Project  
Open House Map





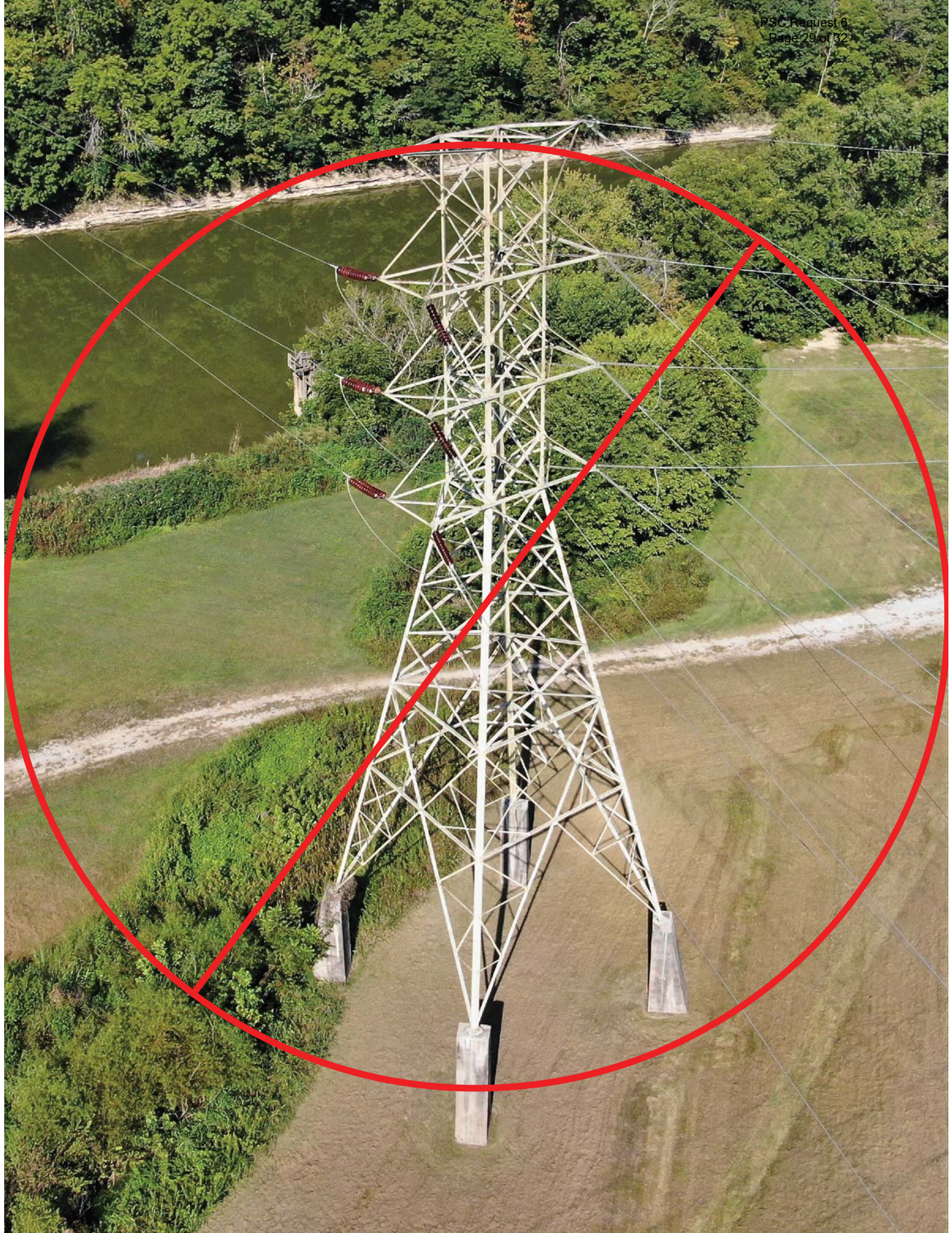












Fawkes - Duncannon Lane - Open House Notes

22-Sep-22

Property #	Property Owners	Phone	Comments
23	Floyd		Dog in Fenced area, keep fenced up
70	Givens		Owns part of 68 to the fence. Water meter/water service line around pole. Drain goes from behind house to the pole location
137 & 138	Steve and Diane Sebastian		Broken concrete driveway when replacing wood pole. Removed trees. They have small trees that may need trimmed. Water line and gas lines along road
140	Joanna Park (heir) Carnes is PVA owner		No concerns
N/A	Dorian Yeager		2653 Lancaster Rd. Line does not cross property. No concerns. Along Fawkes - West Berea 138 kV. 3 pole structure that was replaced, guy wires need to be checked to verify if its on the EKPC easement.
126	Bustos		Wants to keep maple tree on back side of property to hide view of lines. Underground electrical on back of property
77, 79	King Rentals (Gary King)		Wants to confirm ROW width 60 or 100 feet. Worried about pole in front of his house
167	Lee Ann Shrout		1210 Parrish Road, Livestock - cows owned by neighbor leased by Malcom Conlee and Jim Reece
61	Bonnie Harris		Came with Tract 63. Same discussion. Also, had questions about parcel 62; he was unable to attend but would discuss with him. Said school and park going on Goggins. No concerns otherwise
63	Eileen Lear		Pet Cemetery in Backpark. She will mark so archeological doesn't get into it. Garage in back of yard they would like to not be disturbed. Told us that property 65 put a shed in under the line.

2	Stephens		Has concerns over driveway. Reach out to PDM about potential damages
10	Martha and Larry Dorman		David Frazier getting a contact on this
35	Benton		Borings are ok. Pine tree on south side - top only if possible
50	Napier		Call or text
169	Black		Water line along road. Use gate for access (along Parrish road)
N/A	Cindy hale		Across from 126 - worried about cancer did not want to talk with EKPC EMF experts present
141	Wimberly (new owners)		Concerns regarding easement rights. May consider single pole vs H-frame. Both Lawyers. Is disputing right to upgrade and 100' easement. Jacinta spoke with them. Water main across property. Okay to survey but contact first. Talked with EKPC Legal.
70	Givens		Owns part of parcel 68, water line near pole. Drain near existing pole
15	Rehme		Pipeline potential in vicinity of 2 pole structure
39	The Oakmond Group		concerned about fence and access to deadend
145	Hendricks		
169	Conlee		Brown poles
45	Bogard		concerned about tree in front yard, contact her if you want to talk to Parcel 44
8	Debbie Vescio		Parcel 8 - residential
N/A	Harry Rildley		
N/A	Donna Huffman		
N/A	Stephanie Nelson		
N/A	Larry Bailey		
N/A	Bedell		

FAWKES-DUNCANNON TRANSMISSION LINE PROJECT: Responses to surveys distributed at Sept. 20, 2022 open house

RESPONDENT NAME	ADDRESS	Location of property (Map #)	Q2: Which apply? Live/work in immediate area Frequently travel roads in immediate area	Q4: Arch/histor significant features?	Q6: Most imp qualities/features of area	OH eval: Information	OH eval: advert	OH eval: Questions answered by	OH eval: know more about EKPC?	Any questions NOT addressed?	If yes, what was question and may we contact you to discuss?
Martha Bogard	409 Martin Dr. Richmond KY 40475-3511		Live/work in immediate area	NA		Adequate amount of info	Adequate	EKPC staff	Yes	No	
Robert Stephens	4970 Goggin Lane Richmond KY		Live/work in immediate area	No		Adequate amount of info	Early enough	EKPC staff	Yes	No	
Bobbi Bedell	504 Martin Dr.		Live/work in immediate area	My home and fence	My home, fence, and the wildlife that lives in the brush area	Adequate amount of info	Adequate	EKPC staff	Yes	No	
Antony Bustos	332 Timothy Way Richmond KY 40475	126	Live/work in immediate area	No	Beautiful meadow, unobstructed view	Adequate amount of info	Adequate	EKPC staff, displays	Yes	No	
Jimmy Givens	114 Eastern Hills Dr Richmond KY	70	Live/work in immediate area	No		Adequate amount of info	Adequate	EKPC staff	Yes	Yes	
Bonnie Harris	124 Millstone Dr Richmond KY 40475		Live/work in immediate area	No		Adequate amount of info	Adequate	EKPC staff	Yes	No	
Eileen Lear	123 Millstone Dr Richmond KY 40475	"63 maybe?"	Live/work in immediate area	No but neighbor at 121 Millstone parked a large building beneath the transmission line last November (10 months ago)		Adequate amount of info	Adequate	EKPC staff	checkmark		

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**REQUEST 7**

**RESPONSIBLE PARTY: Laura LeMaster**

**Request 7.** Provide a written copy of any landowner comments or concerns with any portion of the proposed projects in the Application. If not written, provide a summary of any verbal conversations with landowners.

**Response 7.**

See attachments provided with Second Request for Information Response 6. EKPC has had verbal conversation with a property owner along the proposed centerline regarding EKPC's existing easement rights. The property owner disagrees with EKPC's rights in regard to the rights conferred under the easement. This was discussed with the property owner at the open house and was further discussed with the property owner in a follow up call.

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**REQUEST 8**

**RESPONSIBLE PARTY: Darrin Adams**

**Request 8.** Refer to the Application, Exhibit 16, Direct Testimony of Darin Adams (Adams Testimony), page 8, lines 16–21. Explain what actual industrial load growth or additions in the area have occurred since the 2021 transmission planning analysis. Include the actual increase in megawatts (MW) for the area.

**Response 8.**

The actual load increase experienced in the area for the 2022 winter peak versus the 2021 winter peak is 3.0 MW, and is broken down by substation below:

<b>Substation</b>	<b>2022 Actual Winter Peak Load (MW)</b>	<b>2021 Actual Winter Peak Load (MW)</b>	<b>Difference</b>
Alcan #1	5.3	4.1	1.2
Alcan #2	14.1	14.9	(0.8)
Crooksville	10.0	9.4	0.6
Duncannon Lane	1.8	1.3	0.5
Hickory Plains	23.9	23.1	0.8
PPG	2.3	2.4	(0.1)
Speedwell Road	N/A	N/A	N/A
West Berea	16.0	15.2	0.8
<b>Total</b>	<b>73.4</b>	<b>70.4</b>	<b>3.0</b>

As indicated in the table, the Speedwell Road substation was not yet constructed at the time of the 2021 and 2022 winter peaks. This substation was energized in July 2022 and will serve AppHarvest, a new industrial facility located adjacent to the substation. The forecasted 2023 winter peak load for this substation is 26.9 MW.

The actual load values in the table are less than was forecasted for the substations for a normal 1-in-2 probability winter. EKPC's forecasted total values for these substations for 1-in-2 winter peak load conditions was 82.6 MW in 2021 winter and 88.4 MW for 2022 winter. This is consistent with EKPC's experience system-wide – for 2021 winter, EKPC's actual system peak load was 88.6% of the forecasted peak for a normal 1-in-2 probability winter, and for 2022 winter, EKPC's actual winter peak load was 84.8% of the normal 1-in-2 probability load forecast.

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**REQUEST 9**

**RESPONSIBLE PARTY: Darrin Adams**

**Request 9.** Refer to the Adams Testimony, page 11, lines 13–20. Provide specific information regarding customers to be served by the New Industrial Substation. Provide the status of negotiations or contracts that have been executed with new customers to be served by EKPC.

**Response 9.**

There have been no direct negotiations with new or existing customers to be served by Blue Grass Energy and EKPC at this site, nor have any contracts been executed.

EKPC does not have any specific information regarding customers that might be served by the New Industrial Substation, but this is not unusual at this point in a project's development. EKPC has received numerous requests from potential industrial customers (usually via the Kentucky Cabinet for Economic Development) for information regarding ability to serve the potential facility and timeline to serve. Due to the confidential nature of these projects, EKPC typically receives very limited information regarding the prospective customer from the Cabinet until an announcement is imminent.



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**REQUEST 10**

**RESPONSIBLE PARTY: Lucas Spencer**

**Request 10.** Explain what the North American Electric Reliability Council (NERC) right-of-way (ROW) requirement is for a 138 kV transmission line as well as a 69 kV transmission line.

**Response 10.** NERC's mission is to ensure effective and efficient reduction of risks to the reliability and security of the grid. NERC does not provide guidance on ROW width for transmission lines.

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REQUEST 11

RESPONSIBLE PARTY: Lucas Spencer

**Request 11.** Explain what the conductor blow-out requirements are and how they affect the ROW requirements for this project as proposed in its entirety.

**Response 11.** The conductor blow-out requirements are to maintain National Electric Safety Code (“NESC”) clearances when wire is displaced by wind. There are no NESC standards that define the width of a transmission right-of-way, however, good utility practice is to keep the conductor within the right-of-way under the blow-out conditions outlined in NESC 324A-2 defined as a 6psf (48-mph) wind. The affect of this requirement on the ROW width for this project is to assure that adequate ROW width combined with the structure details and design result in no NESC violations under “blow-out” conditions. It is important to note that this is not the only requirement addressed when determining ROW width. Access to the structures, adequate space for construction and maintenance activities, adequate width for vegetation control, etc also contribute to the determination of the ROW width.

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**REQUEST 12**

**RESPONSIBLE PARTY:            Laura LeMaster**

**Request 12.**            Explain whether any landowner who may be affected by the movement of the proposed 138 kV or the proposed 69 kV transmission center line in any direction was notified of the possibility that the center line and the associated ROW could shift up to 100 feet in any direction from the selected location in the landowner notifications or any public outreach prior to this proceeding. If not, explain why not.

**Response 12.**

The proposed centerline, which is the same for both the proposed 138 kV line and the 69 kV line, was shown on all maps utilized for the September 20, 2022, open house. As stated in Response 6, all affected property owners were provided a mailer including an information packet and a letter about the project. During the open house, property owners in attendance were made aware that structure locations were preliminary and final location is dependent on additional factors, including geotechnical investigation and surveying, specifically underground surveying. It is EKPC's intent to keep the new centerline as close to the existing centerline as possible. No specific ranges were discussed with landowners or open house attendees related to potential centerline shifts.

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**REQUEST 13**

**RESPONSIBLE PARTY: Darrin Adams**

**Request 13.** Provide the current available capacity of EKPC's transmission facilities in the Fawkes/New Industrial Substation area.

**Response 13.**

EKPC can serve approximately 3 MW of additional load on the 69 kV system between the Fawkes and West Berea substations beyond the existing load served from that circuit (existing load level is approximately 107 MW at winter peak).

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**REQUEST 14**

**RESPONSIBLE PARTY: Darrin Adams**

**Request 14.** Provide the expected available capacity in the Fawkes/New Industrial Substation area once the proposed projects are completed.

**Response 14.**

EKPC can serve approximately either 179 MW of additional load from the 138 kV system at the New Industrial Substation, or 55 MW of additional load from the 69 kV system, depending on whether the 138-69 kV step-down transformer is installed at the Madison County substation to connect the 138 kV and 69 kV systems at that location.

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**REQUEST 15**

**RESPONSIBLE PARTY: Darrin Adams and Laura LeMaster**

**Request 15.** Provide a cost benefit study demonstrating that the projects are cost effective. If no cost benefit study has been performed, explain why not.

**Response 15.**

The cost effectiveness of the proposed Fawkes-Duncannon Lane 138 kV transmission line project is based on prudently utilizing the opportunity to construct the 138 kV transmission circuit as part of the necessary 69 kV line rebuild. As stated in Ms. LeMaster's testimony (page 10, lines 9-15), EKPC's estimated cost to construct the KU Fawkes-Duncannon Lane Tap 69 kV line as a double-circuit 138 kV and 69 kV line is \$19 million, which includes the incremental cost of adding the 138 kV portion to the rebuild of \$10.5 million. Otherwise, EKPC will need to construct a 138 kV transmission line in the future when increased customer demand in the area drives the need for support from the 138 kV system. There are two options that could be implemented to establish that 138 kV circuit in the future:

- A. EKPC could rebuild the KU Fawkes-Duncannon Lane 69 kV line as a single-circuit 69 kV initially at an estimated cost of \$8.5 million. When a 138 kV circuit is needed into the area

to provide voltage support, EKPC would remove and replace this single-circuit Fawkes-Duncannon Lane 69 kV line with a double-circuit 138 and 69 kV line, at an additional cost of \$19 million. Therefore, the total cost to forego the rebuild of the Fawkes-Duncannon Lane 69 kV line as a double circuit 138 and 69 kV line initially and rebuild as such in the future is \$27.5 million.

- B. As in the prior option, EKPC could rebuild the KU Fawkes-Duncannon Lane 69 kV line as a single-circuit 69 kV initially at an estimated cost of \$8.5 million. When a 138 kV circuit is needed into the area to provide voltage support, EKPC would build a new 138 kV circuit from the EKPC Fawkes substation into the area along an alternate route. EKPC has completed a planning level review of cost associated with a new 138 kV circuit from Fawkes to Duncannon Lane and the cost ranges from \$18.1 million to \$19.6 million. This planning level review did not include any evaluation of routing feasibility, but is simply based on estimated length of greenfield construction between the two endpoints. Therefore, the total cost to forego the rebuild of the Fawkes-Duncannon Lane 69 kV line as a double circuit 138 and 69 kV line initially and build a new 138 kV line along a different route in the future is estimated to range between \$26.6 million and \$28.1 million.

These costs provide an obvious indication that it would be financially prudent to utilize the immediate opportunity to couple the addition of a 138 kV circuit with the immediate necessity to rebuild the Fawkes-Duncannon Lane 69 kV line. Otherwise, EKPC will spend at least 40% more in total to establish a line that is almost certain to be necessary in the foreseeable future.

And beyond the overwhelming financial benefits, constructing the double-circuit 138 kV & 69 kV line now also provides other important benefits:

- Minimizes overall impacts on landowners in the area by completing the construction work for both circuits simultaneously along the same right-of-way, rather than requiring two separate construction projects that would require approximately twice the linear distance of construction to establish the two circuits at different points in time.
- Eliminates the need for multiple long-term outages of transmission lines in the area that would most likely be necessary if the 138 kV circuit is built at a later point in the future, since this line would either be co-located at that time with the KU Fawkes-Duncannon Lane 69 kV line, or alternatively would follow a route that may require co-location with another line in the area (e.g., the Fawkes-West Berea 138 kV line). Long-term outages of these facilities are problematic now and will become more of an issue in the future, as area power demand increases, so limiting the exposure to a single outage of the KU Fawkes-Duncannon Lane 69 kV line to perform the construction is much more conducive to maintaining reliable operation of the system.



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**REQUEST 16**

**RESPONSIBLE PARTY: Darrin Adams**

**Request 16.** Refer to the Adams Testimony, page 13. Provide any instances of outages on the KU Fawkes-West Berea 69 kV transmission line that has resulted in an outage at all seven substations.

**Response 16.**

The Speedwell Road distribution substation was first energized in March 2022, and the Duncannon Lane substation was first energized in June 2020. EKPC has not experienced any outages of the Fawkes-West Berea 69 kV circuit since June 2020, therefore no outages have occurred that resulted in an outage of all seven substations. EKPC experienced six outages of the Fawkes-West Berea circuit from January 2004 through January 2020 that resulted in outages of the five distribution substations that were served from the circuit during that period. The dates and durations of those outages are included below:

<b>Date of Transmission Line Outage</b>	<b>Duration of Transmission Line Outage (minutes)</b>
3/27/2004	125
1/29/2008	67
5/8/2009	68
5/25/2011	51
3/1/2017	127
1/11/2020	57

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**REQUEST 17**

**RESPONSIBLE PARTY: Darrin Adams**

**Request 17.** Refer to the Adams Testimony, page 14. The statement was made, “This substation can be expanded in the future to add a 138-to-69kV transformer that would allow EKPC to connect the existing 69 kV system in the area to EKPC’s 138 kV system for needed support when the demand in the area exceeds the current capacity of the system.” Provide any transmission planning studies that indicate when the demand in the area will exceed the current capacity.

**Response 17.**

Assuming there is zero load growth in the area, EKPC’s latest analysis indicates that installation of the 138-69 kV step-down transformer at the Madison County substation will be needed in 2044 to address low-voltage issues in the area. This is based on the voltage level at the Alcan substation dropping below 90% of nominal voltage for an outage of the Fawkes-West Berea 138 kV line with EKPC’s Cooper Units 1 and 2 offline. The year in which low voltage levels first occur was determined by extrapolating results from studies using EKPC’s 2027/28 and 2032/33 Winter peak-load models. However, even a modest industrial load addition to the 69 kV system in the area of 3 MW or more could require installation of the step-down transformer immediately.

It is far more likely that new load will develop on this site than the assumption that no load growth will occur over the next two decades.

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**REQUEST 18**

**RESPONSIBLE PARTY: Darrin Adams**

**Request 18.** Refer to the Adams Testimony, page 15. It was indicated that EKPC plans to move forward with the Madison County 69 kV Switching Station, “very soon.” Provide a timeline for this project.

**Response 18.**

The Madison County 69 kV Switching Station is planned to be constructed and in-service by December 31, 2025. Construction activities are likely to therefore occur in 2025. Prior to construction, EKPC will need to perform activities including siting (determination of potential locations, land acquisition, geotechnical analysis, environmental review, etc.), design (civil, structural, and electrical) and equipment procurement. In order to meet the in-service date of 2025, EKPC will need to begin some of these activities in 2023.

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**REQUEST 19**

**RESPONSIBLE PARTY:            Laura LeMaster**

**Request 19.**            Refer to the Application, Exhibit 17, Direct Testimony of Laura LeMaster (LeMaster Testimony) page 7. Provide information about how many structure or crossarm failures there have been on the current 69 kV transmission line in the last five year

**Response 19.**

Since 2017, EKPC has replaced 10 structures on the Fawkes – Duncannon Lane portion of the Fawkes – West Berea 69 kV transmission line. In March 2017, 5 structures failed during a storm event, in June 2021 a cross arm failed, both of which caused outages. EKPC has been proactive in pole change outs and maintenance to minimize outages due to the age and condition of this line. In the past five years, EKPC has replaced 5 additional poles and completed 1 brace replacement. Based on currently open work orders, EKPC plans to change out 3 additional poles on this line. The risk for failure of aging infrastructure increases with time and reliance on failures/repairs to predict near term performance can result in “too little, too late” when trying to avoid outages and unacceptable reliability. Additionally, rebuilding a transmission line by replacing one failed

component at a time is extremely cost ineffective. Condition assessment is a better basis for replacement decisions.

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**REQUEST 20**

**RESPONSIBLE PARTY: Laura LeMaster**

**Request 20.** Refer the LeMaster Testimony, page 8. Provide the expected in service date for the 138 kV transmission line.

**Response 20.**

As stated in the First Request for Information response 7, the anticipated completion date for the 138 kV transmission line is September 2024. Upon construction completion, the 138 kV will be electrically connected via jumpers to the 69 kV line as a safety precaution. The 138 kV will not operate as a 138 kV line until the substation projects are completed, as outlined in the Application. It is possible, however, that new load will be announced such that demand service from the 138 kV transmission line will coincide with the line becoming available for use.



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**REQUEST 21**

**RESPONSIBLE PARTY:            Laura LeMaster**

**Request 21.**            Refer to the LeMaster Testimony, page 11. Also refer to EKPC's response to Commission Staff's First Request for Information (Staff's First Request), Item 2. Explain when EKPC anticipates the industrial park will be developed to the point that the specific scope of the new substation will be known and will be required.

**Response 21.**

As outlined in Darrin Adams' Response 9 to this Request for Information, EKPC does not have any specific information regarding customers that might be served by the New Industrial Substation within the industrial park, however, EKPC has received numerous requests for information from the Kentucky Department of Economic Development regarding potential industrial customers with interest in locating at the industrial site. As Darrin Adams references in Response 9, due to the confidential nature of these projects, EKPC typically receives very limited information regarding the prospective customers until an announcement is imminent.

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**REQUEST 22**

**RESPONSIBLE PARTY:                Laura LeMaster**

**Request 22.**                Refer to the LeMaster Testimony, page 19. Provide an update on the status of any permits needed for the project. If permits have still not been applied for, explain when the applications for those permits will be made.

**Response 22.**

EKPC plans to apply for project financing assistance from the U.S. Department of Agriculture, Rural Utilities Service (“RUS”), therefore the project constitutes a Federal action subject to Nation Environmental Policy Act (“NEPA”) review, which is currently ongoing, Site-specific surveys have been completed and report are being prepared for various state and federal review, including State Historic Preservation Office - Section 106 National Historic Preservation Act, U.S. Fish and Wildlife Service – Section 7 Endangered Species Act, and evaluation of potential project impacts to Floodplain, Air/Water Quality, Prime and/or Statewide Important Farmlands and Streams/wetlands, etc. All other permitting will commence upon determination by the Commission and the final design.

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**REQUEST 23**

**RESPONSIBLE PARTY: Lucas Spencer**

**Request 23.** Provide the known number of buildings or other structures currently encroaching on the existing 69 kV transmission line.

**Response 23.** There are 56 buildings (single family residential homes, garage/sheds. Townhomes/Apartment Buildings, Hotel, Gas Station, Commercial Building, Storage Buildings), 4 in-ground pools, 3 billboards and 2 antennas that are currently encroaching on EKPC right-of-way. By utilizing survey data acquired in the summer of 2022 EKPC has determined there are no NESC violations for the existing transmission line.

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**SECOND REQUEST FOR INFORMATION RESPONSE**

**STAFF'S REQUEST DATED 12/1/2022**

**REQUEST 24**

**RESPONSIBLE PARTY: Lucas Spencer**

**Request 24.** Explain whether a structure encroaching in a transmission line ROW is a violation of NERC reliability standards.

**Response 24.** NERC does not have standards that pertain specifically to buildings within the right-of-way. NERC does have standards that pertain to vegetation management, and to operational ratings that might be affected by clearances to encroaching structures.

**EAST KENTUCKY POWER COOPERATIVE, INC.**  
**CASE NO. 2022-00314**  
**SECOND REQUEST FOR INFORMATION RESPONSE**

**STAFF'S REQUEST DATED 12/1/2022**

**REQUEST 25**

**RESPONSIBLE PARTY: Laura LeMaster**

**Request 25.** Explain whether EKPC plans to file any additional Certificate of Public Convenience and Necessity applications for future transmission projects in the next 12 months.

**Response 25.**

Currently, EKPC does not plan to file any additional Certificate of Public Convenience and Necessity applications for future transmission projects within the next 12 months. However, there are numerous unforeseen circumstances that could precipitate the need for a CPCN for a transmission project in the next year, including but not limited to emergent industrial loads, or newly-identified operational or planning concerns that lead to a need for a new project.