

VERIFICATION

STATE OF OHIO)
)
COUNTY OF HAMILTON) **SS:**

The undersigned, John Hurd, Director of Stakeholder Engagement, being duly sworn, deposes and says that he has personal knowledge of the matters set forth in the foregoing data requests and that the answers contained therein are true and correct to the best of his knowledge, information and belief.



John Hurd Affiant

Subscribed and sworn to before me by John Hurd on this 24th day of October,
2023.



ADELE M. FRISCH
Notary Public, State of Ohio
My Commission Expires 01-05-2024



NOTARY PUBLIC

My Commission Expires: 1/5/2024

VERIFICATION

STATE OF OHIO)
)
COUNTY OF HAMILTON) **SS:**

The undersigned, John K. Rogers, Manager Transmission Engineer, being duly sworn, deposes and says that he has personal knowledge of the matters set forth in the foregoing data requests and that the answers contained therein are true and correct to the best of his knowledge, information and belief.



John K. Rogers Affiant

Subscribed and sworn to before me by John K. Rogers on this 24TH day of OCTOBER, 2023.



ADELE M. FRISCH
Notary Public, State of Ohio
My Commission Expires 01-05-2024



NOTARY PUBLIC

My Commission Expires: 1/5/2024

VERIFICATION

STATE OF OHIO)
)
COUNTY OF HAMILTON) **SS:**

The undersigned, Yanthi W. Boutwell, General Manager Transmission Resource & Project Management, being duly sworn, deposes and says that she has personal knowledge of the matters set forth in the foregoing data requests and that the answers contained therein are true and correct to the best of her knowledge, information and belief.

Yanthi W. Boutwell
Yanthi W. Boutwell Affiant

Subscribed and sworn to before me by Yanthi W. Boutwell on this 24TH day of October, 2023.



ADELE M. FRISCH
Notary Public, State of Ohio
My Commission Expires 01-05-2024

Adele M. Frisch
NOTARY PUBLIC

My Commission Expires: 1/5/2024

KyPSC Case No. 2023-0039
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**Duke Energy Kentucky
Case No. 2023-00239
STAFF First Set of Data Requests
Date Received: October 11, 2023**

STAFF-DR-01-001

REQUEST:

Refer to Duke Kentucky’s Application, pages 3-4, paragraph 7. For any portion of the proposed circuit that is to be “rebuilt,” identify any existing infrastructure that will continue to be utilized under the proposed rebuild.

RESPONSE:

To help minimize project costs for the rebuild section, as much existing equipment will be reused as possible. This will be assessed when detailed design is being completed. For the transmission line and equipment, some existing poles may be reused if they have already been replaced with steel poles. The distribution equipment will also continue to be utilized where feasible.

PERSON RESPONSIBLE: Yanthi W. Boutwell

Duke Energy Kentucky
Case No. 2023-00239
STAFF First Set of Data Requests
Date Received: October 11, 2023

STAFF-DR-01-002

REQUEST:

Refer to Duke Kentucky's Application, Exhibit 7 (Siting Study).

- a. Explain how estimated cost was factored into analysis of the routes identified in the Siting Study and the selection of the proposed route.
- b. Provide an estimated cost comparison of the routes analyzed.

RESPONSE:

- a. A cost estimate for each of the routes identified in the Siting Study was not completed. Cost estimates at this stage in the siting study would not have provided substantial additional information to help with the decision process and a priority was placed on identifying practical routes and avoiding and minimizing potential adverse impacts to the environment, land use, and cultural resources. During the route selection study, many of the criteria utilized in the comparative evaluation process represent proxies for financial cost. All of the criteria in the ecology and engineering groups and many of criteria in the land use group listed in Table 2 on pages 36 and 37 in Exhibit 7 are also proxies for cost. For example, more acres of forested land within the proposed ROW represent both additional environmental impacts and also require more vegetation clearing which represents an increase cost to the project. Therefore, given the fact that many of the criteria used in the analysis also are proxies for cost, the routes with a lower overall score in the analysis have a higher likelihood of having a lower overall project cost.

- b. A cost estimate for each route analyzed was not completed during the Siting Study and would not have provided additional information to help differentiate the routes. A detailed cost estimate for Route L, the preferred route for the new line can be found in Exhibit 6 of the Application.

PERSON RESPONSIBLE: John K. Hurd

Duke Energy Kentucky
Case No. 2023-00239
STAFF First Set of Data Requests
Date Received: October 11, 2023

STAFF-DR-01-003

REQUEST:

Refer to Duke Kentucky's Application, Exhibit 7. Refer also to Case No. 2022-00364,¹ Exhibit 7. Confirm that Exhibit 7, (the Stantec Hebron to Oakbrook Reliability Project 138 kV Transmission Line Route Selection Study Report) filed in the present case has not been changed and is identical to the report filed as Exhibit 7 in Case No. 2022-00364. If there have been changes, discuss what changes were made to the present report.

RESPONSE:

Exhibit 7 (the Stantec Hebron to Oakbrook Reliability Project 138 kV Transmission Line Route Selection Study Report) in both Case No. 2022-00364 and the current Case No. 2023-00239 is identical and no changes were made.

PERSON RESPONSIBLE: John K. Hurd

¹ Case No. 2022-00364, *Electronic Application of Duke Energy Kentucky, Inc. for a Certificate of Public Convenience and Necessity to Construct a 138-kV Transmission Line and Associated Facilities in Boone County, Kentucky* (filed Apr 6, 2023), Exhibit 7

Duke Energy Kentucky
Case No. 2023-00239
STAFF First Set of Data Requests
Date Received: October 11, 2023

STAFF-DR-01-004

REQUEST:

Refer to the Direct Testimony of Yanthi W. Boutwell (Boutwell Direct Testimony), page 11, lines 12–16. If any alternative materials or design were considered, describe them and provide an estimated cost differential.

RESPONSE:

The design materials selected for this project are the Duke Energy Midwest standard transmission poles and equipment for a 138 kV transmission line, which are similar to industry standards for transmission lines. Since the standard equipment for a 138 kV transmission line was able to be utilized for this project, no alternative materials or design were considered. Utilizing standard poles and equipment provide operational and maintenance benefits. Standard poles and equipment are often readily available in case of an unexpected outage allowing customers to regain service much faster with less overall costs.

PERSON RESPONSIBLE: John K. Rogers

REQUEST:

Refer to Boutwell Direct Testimony, page 15, lines 14–15.

- a. Explain how wide the Filing corridor is as compared to the proposed transmission line right-of-way (ROW).
- b. Explain potentially how far to the right or left the centerline could be moved if the proposed transmission line were to be moved within the Filing Corridor.
- c. Explain potentially how far to the right or left the ROW could be moved if the proposed transmission line were to be moved within the Filing Corridor.

RESPONSE:

- a. The Filing corridor is 200 ft. wide or 100 ft. on either side of the proposed centerline. The proposed transmission line ROW for the new line portion of the project is 100 ft. wide or 50 ft. on either side of the proposed centerline.
- b. The centerline could be moved 50 ft. left or right of the proposed centerline within the Filing Corridor.
- c. The ROW could be moved 50 ft. left or right and remain within the Filing Corridor.

PERSON RESPONSIBLE: Yanthi W. Boutwell

Duke Energy Kentucky
Case No. 2023-00239
STAFF First Set of Data Requests
Date Received: October 11, 2023

STAFF-DR-01-006

REQUEST:

Refer to the Direct Testimony of John K. Hurd (Hurd Direct Testimony), page 5, lines 4–7. Once the proposed project is completed and the new #15264 line is converted to 138 kV, explain whether there will still be a 69 kV line that was part of the currently existing #15268 and #6763 lines. Include in the response whether the Oakbrook substation will only interconnect 138 kV transmission lines distribution voltages notwithstanding.

RESPONSE:

Once the Project is completed and the new #15264 is converted to 138 kV, the existing #15268 circuit will still be 69 kV voltage and connect the Hebron and Constance substations. The only remaining portion of the #6763 circuit will be the portion east of I75 and will also still be operated at 69 kV. The Oakbrook Substation will then only interconnect 138 kV transmission lines which will include the #15264 Hebron to Oakbrook and the Oakbrook to Aero 138 kV transmission lines.

PERSON RESPONSIBLE: John K. Hurd

**Duke Energy Kentucky
Case No. 2023-00239
STAFF First Set of Data Requests
Date Received: October 11, 2023**

STAFF-DR-01-007

REQUEST:

Refer to Hurd Direct Testimony, page 5, lines 6–10. Explain whether the portions of the new #15264 circuit that will be utilizing existing portions of line #15268 and #6763 (i.e. north of the Limaburg Substation) are built to 138 kV standards or will they have to be reconducted to accommodate the 138 kV voltage.

RESPONSE:

The portion of the new #15264 circuit between where the new line connects to the existing #15268 circuit and the Limaburg Substation (where the existing #6763 circuit begins) are not currently built to 138 kV standards. This portion of the circuit would need rebuilt to accommodate the 138 kV standards which may include reconductoring. A more detailed evaluation of the existing conductor capacity with the expected load will be completed closer to the need for the 138 kV conversion project.

PERSON RESPONSIBLE: John K. Hurd

**Duke Energy Kentucky
Case No. 2023-00239
STAFF First Set of Data Requests
Date Received: October 11, 2023**

STAFF-DR-01-008

REQUEST:

Refer to Duke Kentucky's Application, Exhibit 14 and Hurd Direct Testimony, page 5, lines 10–14. After the proposed project is completed, explain how the portion of the Duke Tap to Limaburg 69 kV line running from the point where the new 2.1 mile line section ties in with the existing Duke Tap to Limaburg 69 kV line North to the Duke Hebron to Constance 68 kV line.

RESPONSE:

This portion of the Duke Tap to Limaburg 69 kV line (existing #15268 circuit) will be retired. Similar to the portion of the #6763 that will also be retired, the transmission equipment will be removed and the poles will be topped. The poles and easements will remain in place to support the distribution lines also attached to these poles.

PERSON RESPONSIBLE: John K. Hurd

Duke Energy Kentucky
Case No. 2023-00239
STAFF First Set of Data Requests
Date Received: October 11, 2023

STAFF-DR-01-009

REQUEST:

Refer to Hurd Direct Testimony, page 14, lines 9–13. Refer also to June 16, 2023 Order in Case No. 2022-00364.¹ State whether the landowners who were not noticed in Case No. 2022-00364 and were given notice in the present case provided any comment or response to the notice letters and provide or describe any comments or responses.

RESPONSE:

No comments or responses have been received by landowners who were not notified in Case No. 2022-00364 that were notified in the current Case No. 2023-00239.

PERSON RESPONSIBLE: John K. Hurd

¹ Case No. 2022-00364, *Electronic Application of Duke Energy Kentucky, Inc. for a Certificate of Public Convenience and Necessity to Construct a 138-kV Transmission Line and Associated Facilities in Boone County, Kentucky* (Ky. PSC June 16, 2023), Order at 8.