

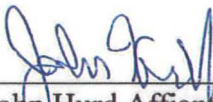
KyPSC Case No. 2023-00239
TABLE OF CONTENTS

<u>DATA REQUEST</u>	<u>WITNESS</u>	<u>TAB NO.</u>
STAFF-DR-03-001	John K. Hurd.....	1
STAFF-DR-03-002	Dawn Fuller	2

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.



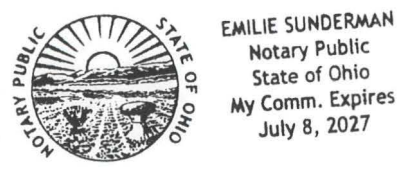
John Hurd Affiant

Subscribed and sworn to before me by John Hurd on this 18 day of December, 2023.



NOTARY PUBLIC

My Commission Expires: July 8, 2027



VERIFICATION

STATE OF OHIO)
) SS:
COUNTY OF HAMILTON)

The undersigned, Danw Fuller, Sr. Stakeholder Engagement Manager, being duly sworn, deposes and says that she has personal knowledge of the matters set forth in the foregoing rehearing data requests, and that the answers contained therein are true and correct to the best of her knowledge, information and belief



Dawn Fuller Affiant

Subscribed and sworn to before me by Dawn Fuller on this 11th day of December, 2023.



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



NOTARY PUBLIC

My Commission Expires: 1/5/2024

Duke Energy Kentucky
Case No. 2023-00239
STAFF Third Set of Data Requests
Date Received: December 5, 2023

STAFF-DR-03-001

REQUEST:

Refer to Duke Kentucky’s Application, Exhibit 7 (Route Selection Study Report), pages 16–18 and 43; and Duke Kentucky’s Response to Commission Staff’s First Request for Information, Item 2(a).

- a. Verify that route “G” had the best quantitative criteria score and would be the most cost-effective route. If it is not, state which evaluated route had the best score and which would be the most cost-effective route.
- b. State whether route “G” was eliminated as an option based on one or more qualitative reasons, including but not limited to the fact that it would run over the I-275 cloverleaf. If qualitative reasons were not why route “G” was eliminated, state why it was eliminated.
- c. If route “G” was eliminated as an option based on the fact that it would run over the I-275 cloverleaf, explain why this fact is prohibitive, why the Route Selection Study Report does not indicate it is prohibitive, and why the model considers segments with span lengths that are not feasible.
- d. If span lengths of a certain length are eliminated, either by the model or by post-modeling qualitative elimination, state the maximum span length and why that is the maximum length considered.

RESPONSE:

- a. Route G did have the best overall quantitative score. The quantitative analysis and qualitative considerations not captured in the quantitative analysis were considered in selecting the preferred route. As stated in DR-01-002(a) a cost estimate for each of the routes identified in the Siting Study was not completed; priority was placed on identifying practical routes and avoiding and minimizing potential adverse impacts to the environment, land use, and cultural resources. After incorporating the qualitative considerations of segment 12, 25, and 26, compared to other route alternatives it was determined that those segments had significant technical challenges and limitations that would likely increase the potential costs of the project, increase the potential adverse impacts to surrounding land uses such as businesses, as well as potentially increase the time needed to complete the project if above ground structures or underground utility conflicts could not be avoided.
- b. Route G was eliminated due to the additional qualitative considerations identified during the route selection study. These qualitative reasons included anticipated space constraints by existing infrastructure, additional impacts to nearby businesses, existing retaining walls, conflicts with underground utilities, the need to cross over the proposed EKPC transmission line at Highway 237, required FAA lighting, and crossing the I-275 cloverleaf.
- c. Route G was eliminated due to many qualitative criteria outlined in the above response to (b), including crossing the I-275 cloverleaf. Crossing the I-275 cloverleaf, by itself, would not have been prohibitive unless the KYTC would not approve this proposed route alternative. Crossing the I-275 cloverleaf is less favorable because it requires transmission structures to be placed within the KYTC

road right-of-way (ROW). Structures within the road ROW are more challenging to construct, operate, and maintain due to the additional traffic and safety restrictions associated with working within the road ROW. Also, crossing I-275 at the cloverleaf would require an additional number of taller structures to maintain required height clearance requirements. Span lengths considerations are addressed in more detail in the response to (d) below.

- d. Span lengths of a certain length were not eliminated in this study. Span lengths over 400 ft. for transmission-only circuits often require more detailed engineering, taller structures, potentially engineered structures, additional construction requirements, and potentially cost more. Therefore, in the quantitative portion of the study, 400 ft. was used as a measurable criteria to compare all routes against each other. In circumstances where distribution underbuild would be required, then span lengths are shorter and the standard distance between structures is usually limited to 300 ft.

PERSON RESPONSIBLE: John K. Hurd

**Duke Energy Kentucky
Case No. 2023-00239
STAFF Third Set of Data Requests
Date Received: December 5, 2023**

STAFF-DR-03-002

REQUEST:

Refer to Duke Kentucky’s Application, Exhibit 12, pages 4, 16–17, and 21– 34, consisting of two parcel/property owner lists and USPS return receipt “green cards.”

- a. State the difference between the tables on pages 4 and 16–17.
- b. Provide USPS return receipt “green cards” not included in Application Exhibit 12 for any listed property owner. If any green cards are not able to be provided, explain why.

RESPONSE:

- a. The table on page 4 is the list of property owners along the Hebron to Oakbrook new line portion of the project within the filing corridor that were mailed a notification letter. The green certified mail return receipts for this portion of the project are included in exhibit 12, pages 8-12. The table on pages 16-17 is the list of property owners within the Limaburg to Oakbrook rebuild filing corridor that were sent a notification letter. The green certified mail returns for this portion of the project are included in exhibit 12, pages 21-34.
- b. The original notification letters were sent by certified mail. All of the signed certified mail return receipt “green cards” received by Duke Energy Kentucky were included in Exhibit 12. If the property owner did not sign for the letter, then a green card was not received. If property owners did not sign for the certified letter or if

letters were returned as undeliverable, addresses were verified, and letters were re-sent using a first class stamp as a second attempt to notify them.

PERSON RESPONSIBLE: Dawn Fuller