COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

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ELECTRONIC APPLICATION OF EAST)	
KENTUCKY POWER COOPERATIVE, INC	·)	
FOR CERTIIFCATES OF PUBLIC)	CASE NO.
CONVENIENCE AND NECESSITY FOR)	2024-00108
CONSTUCTION PROJECTS IN MARION)	
COUNTY, KENTUCKY AND OTHER)	
GENERAL RELIEF)	

VERIFIED APPLICATION

Comes now East Kentucky Power Cooperative, Inc., ("EKPC" or the Company") by and through the undersigned counsel, pursuant to KRS 278.020, 807 KAR 5:001, 807 KAR 5:120 and other applicable law and hereby tenders its Application with the Kentucky Public Service Commission ("Commission") requesting approval for two Certificates of Public Convenience and Necessity ("CPCN") to construct two transmission projects in Marion County, Kentucky. In support of the Application, EKPC respectfully states as follows:

I. INTRODUCTION

1. EKPC is a not-for-profit, rural electric cooperative corporation established under KRS Chapter 279 with its headquarters in Winchester, Kentucky. Pursuant to various agreements, EKPC provides electric generation capacity and electric energy to its sixteen (16) Owner-Member Cooperatives ("owner-members"), which in turn serve over 570,000 Kentucky homes, farms and commercial and industrial establishments in eighty-nine (89) Kentucky counties. EKPC's Board has stated its strategic objective is to maintain a generation fleet that prudently diversifies its fuel

sources while maximizing the potential of its capital investments and minimizing stranded assets. EKPC is a "utility" as that term is defined in KRS 278.010(3)(a) and a "generation and transmission cooperative" as that term is defined in KRS 278.010(9).

- 2. In total, EKPC owns and operates approximately 2,963 MW of net summer generating capacity and 3,265 MW of net winter generating capacity. EKPC owns and operates coal-fired generation at the John S. Cooper Station in Pulaski County, Kentucky (341 MW) and the Hugh L. Spurlock Station (1,346 MW) in Mason County, Kentucky. EKPC also owns and operates natural gas-fired generation at the J. K. Smith Station in Clark County, Kentucky (753 MW (summer)/989 MW (winter)) and the Bluegrass Generating Station in Oldham County, Kentucky (501 MW (summer)/567 MW (winter)), landfill gas-to-energy facilities in Boone County, Greenup County, Hardin County, Pendleton County and Barren County (13 MW total), and a Community Solar facility (8.5 MW) in Clark County, Kentucky. Finally, EKPC purchases hydropower from the Southeastern Power Administration at Laurel Dam in Laurel County, Kentucky (70 MW), and the Cumberland River system of dams in Kentucky and Tennessee (100 MW). EKPC also has 200 MWs of interruptible load and approximately 26 MWs in peak reduction mechanisms. EKPC's record peak demand of 3,754 MW occurred on January 17, 2024.
- 3. EKPC owns 2,995 circuit miles of high voltage transmission lines in various voltages, mainly 69kV and greater. EKPC also owns the substations necessary to support this transmission line infrastructure. Currently, EKPC has seventy-seven (77) free-flowing interconnections with its neighboring utilities. EKPC's transmission system is operated by PJM Interconnection, LLC ("PJM"), of which EKPC has been a fully integrated member since June 1, 2013. PJM is a regional electric grid and market operator with operational control of over 185,000

MW of regional electric generation. It operates the largest capacity and energy market in North America.

II. FILING REQUIREMENTS

4. Pursuant to 807 KAR 5:001, Section 14(1) and 807 KAR 5:120 Section 1(2), EKPC's business address is 4775 Lexington Road, Winchester, Kentucky 40391 and its mailing address is Post Office Box 707, Winchester, Kentucky 40392-0707. EKPC's telephone number is (859) 744-4812 and its fax number is (859) 744-6008. EKPC's email address is: psc@ekpc.coop. EKPC requests that the following individuals be included on the service list:

Chris Adams, EKPC's Director of Regulatory and Compliance Services:

chris.adams@ekpc.coop

L. Allyson Honaker, Counsel for EKPC:

allyson@hloky.com

Brittany Haynes Koenig, Counsel for EKPC:

brittany@hloky.com

Heather S. Temple, Counsel for EKPC:

heather@hloky.com

- 5. Pursuant to 807 KAR 5:001, Section 14(2), EKPC is a Kentucky corporation, in good standing, and was incorporated on July 9, 1941. A certificate of good standing is attached to this Application as Exhibit 1.
- 6. Pursuant to 807 KAR 5:001, Section 15(2)(a), EKPC has included the facts relied upon to show that the proposed construction is or will be required by public convenience or necessity in the Direct Testimony of Lucas Spencer, included as Exhibit 2 to this Application.

- 7. Pursuant to 807 KAR 5:001, Section 15(2)(b), EKPC has listed in Exhibit 3, the necessary franchises or permits that will be necessary for construction of the proposed transmission lines. EKPC will file copies of each of the franchises or permits when they are obtained from the proper authorities.
- 8. Pursuant to 807 KAR 5:001, Section 15(2)(c) and 807 KAR 5:120 Section 1(2), EKPC is requesting two CPCNs. The first project ("Metts Drive 161 kV Tap") will include the construction of a 161kV Distribution Substation located along Metts Drive in Lebanon, Kentucky as well as the associated 161kV transmission line tap which will be approximately one (1) mile in length. A more detailed description of the proposed location, route, or routes of the proposed construction is contained in the Direct Testimony of Lucas Spencer's contained in Exhibit 2 to this Application. The second project the ("Marion County Industrial 161 kV Tap Line Loop-In") will include the construction of a parallel transmission line totaling approximately 2.2 miles in length and will tap EKPC's 161kV Marion County Green County transmission line. A more detailed description of the proposed location, route, or routes, of the proposed construction is contained in the Direct Testimony of Lucas Spencer contained in Exhibit 2 to this Application.
- 9. Pursuant to 807 KAR 5:001, Section 15(2)(c), a description of the manner in which the new lines will be constructed, and the names of all public utilities, corporations, or persons with whom the proposed construction or extension is likely to compete is included in the Direct Testimony of Mr. Spencer, contained in Exhibit 2 to this Application.
- 10. Pursuant to 807 KAR 5:001, Section 15(2)(e), EKPC plans to initially finance the proposed construction of the Metts Drive 161 kV Tap and the Marion County Industrial 161 kV Tap Line Loop-In with general funds and to refinance with additional items into a larger

refinancing package at a later date. The Projects will not materially affect the financial condition of EKPC.

- 11. Pursuant to 807 KAR 5:001, Section 15(2)(f), EKPC's estimated annual cost of operation after the Metts Drive 161 kV Tap is placed into service is \$121,552 and the Marion County Industrial 161 kV Tap Line Loop-In is \$243,763.
- 12. Pursuant to 807 KAR 5:120, Section 1, EKPC filed its Notice of Intent to file this Application on April 17, 2024. A copy of the Notice of Intent is attached as Exhibit 4 to this Application.
- 13. Pursuant to 807 KAR 5:120 Section 2(2)(a), three maps of suitable scale, no less than one inch equals 1,000 feet for each of the proposed projects are attached as Exhibits 5, the Marion County Industrial 161 kV Tap Line Loop-In, and 6, the Metts Drive 161 kV Tap, to this Application. The maps show the location of the proposed transmission line centerline and right of way, and boundaries of each property crossed by the transmission line right of way, based upon the records of the Marion County Property Valuation Administrator ("PVA").
- 14. Pursuant to 807 KAR 5:120 Section 2(2)(b), Exhibit 7 also includes sketches of the proposed typical transmission line support structures for the projects.
- 15. Pursuant to 807 KAR 5:120 Section 2(2)(c), Exhibits 8 through 18 also include additional maps that shows the alternative routes that were considered by EKPC. These alternative routes are also discussed in more detail in the siting studies that were completed by NV5 Geospatial, which are attached at Exhibits 19, the Marion County Industrial 161 kV Tap Line Loop-In, and 20, the Metts Drive 161 kV Tap, to this Application.
- 16. Pursuant to 807 KAR 5:120 Section 2(4), EKPC has given notice by mailing to each property owner over whose property each of the transmission lines is proposed to cross. The

notices were mailed via first-class mail to the addresses listed by the Marion County PVA records on May 17, 2024. The verification of Nick Comer, External Affairs Manager for EKPC is attached to the Application as Exhibit 21, stating he was responsible for mailing the required notices. Attached to his verification is a copy of the notice containing all of the information required by 807 KAR 5:120 Section 15(3) that was mailed along with a list of names and addresses of the property owners to whom the notice was sent. Additionally included in Exhibit 21, is proof of notice to landowners of the open house EKPC held on February 29, 2024, at the Marion County Extension Office.

- 17. Pursuant to 807 KAR 5:120 Section 2(6), EKPC also published a notice of the application to request a certificate of public convenience and necessity to construct the transmission lines on May 22, 2024, in *The Lebanon Enterprise*, which is a newspaper of general circulation in Marion County, Kentucky. This notice included all of the necessary information contained in 807 KAR 5:120 Section 2(5), including a map showing the proposed route, a statement of the right to request a local public hearing, and a statement that interested persons have the right to request to intervene. EKPC is attaching a copy of the newspaper notice as Exhibit 22 to the Application. EKPC will provide the publisher's affidavit within the statutory timeframe.
- 18. Pursuant to KRS 322.340, the engineering plans, specifications, drawings and reports for the proposed construction are signed, sealed and dated by an engineer registered in Kentucky.

REQUEST FOR CPCN

19. EKPC is requesting the Commission to grant a CPCN for the construction of the Metts Drive 161kV Tap. EKPC is also requesting the Commission grant a CPCN for the construction of Marion County Industrial 161 kV Tap Line Loop-In.

- 20. In addition, EKPC is requesting the Commission to grant it the authority to move the location of the line up to 50 feet on either side of the centerline shown on the map(s) attached as Exhibits 5 and 6, to account for any unexpected conditions that may arise during the construction of the 161 kV transmission lines.
- 21. EKPC states that the proposed transmission lines and the facilities indicated above are necessary to provide safe and reliable service to its Owner-Member distribution cooperatives and ultimately their end-users. The need for the transmission lines and associated facilities is described in more detail in the Direct Testimony of Darrin Adams, attached at Exhibit 23.
- 22. EKPC has reviewed the proposed routes and believes the process has selected the route that will have the least impact on the surrounding area and property owners. The 161 kV lines and related investments are projects needed to maintain adequate substation and distribution-feeder capacity and to improve overall reliability in the service area. The parameters of the project were also carefully calibrated to avoid wasteful duplication of investment and the unnecessary cluttering of landscape with utility infrastructure. In order to evaluate the routes thoroughly, EKPC engaged the experts at NV5 Geospatial to conduct a sitting study to determine the best route for the project. This siting report(s) are attached as Exhibits 8 and 9, and shows not only the chosen route, but also the alternative routes that were considered.

WHEREFORE, EKPC respectfully requests the Commission to grant:

- (1) a CPCN for the construction of the of the Metts Drive 161kV Tap;
- (2) a CPCN for the construction of the Marion County Industrial 161 kV Tap Line Loop-In;

(3) authority to move the location of the line fifty (50) feet on either side of the centerline as shown on the map(s) attached as Exhibits 3 and 4, to account for any unexpected conditions that may arise during the construction of the 161 kV transmission lines; and (4) all other relief to which EKPC may be entitled.

This 17th day of May, 2024.

Respectfully Submitted,

L. Allyson Honaker

Brittany Hayes Koenig

Heather S. Temple

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heather@hloky.com

Counsel for East Kentucky Power Cooperative, Inc.

EXHIBIT LIST

EXHIBIT NO.	TITLE	RESPONSIBLE PERSON
1	CERTIFICATE OF GOOD STANDING	JACOB WATSON
2	TESTIMONY	LUCAS SPENCER
3	PERMITS AND FRANCHISES	LUCAS SPENCER
4	NOTICE OF INTENT	JACOB WATSON
5	MAP OF PROJECT	LUCAS SPENCER
6	MAP OF PROJECT	LUCAS SPENCER
7	TYPICAL STRUCTURE SKETCHES	LUCAS SPENCER
8 -18	ALTERNATE ROUTE MAPS	LUCAS SPENCER
19	SITING REPORT	LUCAS SPENCER
20	SITING REPORT	LUCAS SPENCER
21	VERIFICATION OF MAILING NOTICE	NICK COMER
	TO PROPERTY OWNERS – SAMPLE	
	NOTICE – LIST OF PROPERTY	
	OWNERS	
22	NEWSPAPER NOTICE AND AFFIDAVIT	NICK COMER
23	TESTIMONY	DARRIN ADAMS

Exhibit 1 Certificate of Good Standing

Commonwealth of Kentucky Michael G. Adams, Secretary of State

Michael G. Adams Secretary of State P. O. Box 718 Frankfort, KY 40602-0718 (502) 564-3490 http://www.sos.ky.gov

Certificate of Existence

Authentication number: 310267

Visit https://web.sos.ky.gov/ftshow/certvalidate.aspx to authenticate this certificate.

I, Michael G. Adams, Secretary of State of the Commonwealth of Kentucky, do hereby certify that according to the records in the Office of the Secretary of State,

EAST KENTUCKY POWER COOPERATIVE, INC.

EAST KENTUCKY POWER COOPERATIVE, INC. is a corporation duly incorporated and existing under KRS Chapter 14A and KRS Chapter 273, whose date of incorporation is July 9, 1941 and whose period of duration is perpetual.

I further certify that all fees and penalties owed to the Secretary of State have been paid; that Articles of Dissolution have not been filed; and that the most recent annual report required by KRS 14A.6-010 has been delivered to the Secretary of State.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my Official Seal at Frankfort, Kentucky, this 26th day of April, 2024, in the 232nd year of the Commonwealth.



chael & aldam Michael G. Adams Secretary of State

Commonwealth of Kentucky

310267/0015195

Exhibit 2 Testimony of Lucas Spencer

COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF:

ELECTRONIC APPLICATION OF EAST)	
KENTUCKY POWER COOPERATIVE, INC.)	
FOR CERTIFICATES OF PUBLIC)	CASE NO.
CONVENIENCE AND NECESSITY FOR)	2024-00108
CONSTRUCTION PROJECTS IN MARION)	
COUNTY, KENTUCKY AND OTHER)	
GENERAL RELIEF)	

DIRECT TESTIMONY OF LUCAS SPENCER ON BEHALF OF EAST KENTUCKY POWER COOPERATIVE, INC.

Filed: May 17, 2024

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:		
FOR CERTIFICATE CONVENIENCE AN	R COOPERATIVE, INC. IS OF PUBLIC D NECESSITY FOR ROJECTS IN MARION)) CASE NO.) 2024-00108))
VERIF	ICATION OF LUCAS SPI	ENCER
STATE OF KENTUCKY COUNTY OF CLARK	}	
Power Cooperative, Inc., being his Direct Testimony and certain	g duly sworn, states that he in filing requirements in the a herein are true and accurat after reasonable inquiry.	ant Department for East Kentucky has supervised the preparation of above referenced case and that the te to the best of his knowledge,
	Lucas	Spencer
The foregoing Verification was of May 2024, by	s signed, acknowledged and a er	sworn to before me this 13th day
	, L	Notary Public

- 1 Q. PLEASE STATE YOUR NAME, BUSINESS ADDRESS, AND
 2 OCCUPATION.
- 3 A. My name is Lucas Spencer and my business address is East Kentucky Power
- 4 Cooperative, Inc. ("EKPC"), 4775 Lexington Road, Winchester, KY 40391. I am a
- 5 Senior Engineer in the Construction and Capital Project Department at EKPC.
- 6 Q. PLEASE STATE YOUR EDUCATION AND PROFESSIONAL
- 7 **EXPERIENCE.**
- 8 A. I received my Bachelor of Science in Applied Physics from Morehead State
- 9 University and a Bachelor of Science in Civil Engineering from the University of
- 10 Kentucky and I am a registered Professional Engineer in the Commonwealth of
- 11 Kentucky. My professional experience includes time spent working as a
- transmission line design engineer at EKPC, and serving as aproject manager for
- EKPC. I joined EKPC in 2013, and worked as a student engineer in Power
- Delivery, where I provided technical assistance and support to various teams in
- EKPC's Power Delivery business unit. In 2017, I joined the transmission line
- design team at EKPC where I designed and managed transmission line projects. In
- 17 2023, I joined the Project Management Department as a Senior Engineer.
- 18 Q. PLEASE PROVIDE A BRIEF DESCRIPTION OF YOUR DUTIES AT
- 19 **EKPC.**
- 20 A. As a Senior Engineer in the Project Management Department, I currently manage
- 21 capital construction projects on behalf of EKPC.
- 22 Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THE KENTUCKY
- 23 PUBLIC SERVICE COMMISSION?

- 1 A. Yes. I have testified before the Kentucky Public Service Commission
- 2 ("Commission") as part of Case No. 2022-00314, which involved approval of the
- addition of a 138kV circuit to EKPC's existing 69kV KU Fawkes-Duncannon Lane
- 4 transmission line.

5 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS

6 **PROCEEDING?**

- 7 A. My testimony will provide an explanation for the transmission line route selection
- process, project scope and costs for the proposed new Metts Drive 161-25 kV
- 9 distribution substation ("Metts Drive Substation") and associated 161 kV tap line
- extension from EKPC's existing South Marion County Industrial 161 kV tap line
- 11 ("Metts Drive 161 kV Tap"), as well as the proposed new 161 kV line section from
- the existing Marion County-Green County 161 kV line to the existing Marion
- 13 County Industrial Substation ("Marion County Industrial 161 kV Tap Line Loop-
- 14 In").

15 Q. ARE YOU SPONSORING ANY EXHIBITS?

- 16 A. Yes, I am sponsoring the following Exhibits:
- 17 Application Exhibit 3 Permit List
- 18 Application Exhibits 5 and 6 Proposed Route Maps
- 19 Application Exhibit 7 Typical Structure Drawings
- 20 Application Exhibits 8 through 18 Alternate Route Maps
- 21 Application Exhibits 19 and 20 NV5 Geospatial Siting Studies
- Each of these exhibits were prepared by me or by subject matter experts acting
- 23 under my management of the project.

Q. WHAT RELIEF IS EKPC SEEKING IN THIS PROCEEDING?

A.

Due to the construction of the Metts Drive Substation, EKPC is requesting a CPCN A. from the Commission for the new Marion County Industrial 161kV Tap Line Loop-In which will have an approximate line length of 2.2 miles and will have a voltage of 161 kV. Additionally, EKPC is requesting a CPCN from the Commission for the new Metts Drive 161kV Tap which will have a length of 1.02 miles and will have a voltage of 161 kilovolts. These projects will be constructed to serve the new Metts Drive Substation which will, as outlined in Mr. Adams' testimony, support improved reliability of service to the Inter-County customers in the area.

10 Q. PLEASE PROVIDE A DESCRIPTION FOR EACH ELEMENT OF THE 11 PROPOSED PROJECT(S).

The Metts Drive Substation is a new 161-25kV distribution substation with an A-frame, additional substation equipment, and associated work, including; but not limited to, metering and controls. This substation will be located near the intersection of Industrial Drive and Metts Drive.

The Metts Drive 161 kV Tap is a 161kV transmission line tap that will tap (i.e., start) at the current EKPC transmission line South Marion Industrial Tap and will traverse along Industrial Drive for 1.02 miles until it reaches the termination point (i.e., end point) on the A-frame at the Metts Drive Substation. EKPC plans to install approximately 10 galvanized steel poles, which will resemble the typical structure drawings attached as Exhibit 6. EKPC will install three (3) phases of 556.5 MCM ACSR conductor and two (2) shield wires to protect the transmission line from lightning strikes and serve grounding purposes. One (1) shield wire will

be a 7no7 alumoweld shield wire, and one (1) shield wire will be an optical ground wire which EKPC utilizes for its own telecommunication infrastructure needs. EKPC will be seeking a 100-foot right of way ("ROW") for this transmission line.

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The Marion County Industrial 161 kV Tap Line Loop-In will tap EKPC's existing Marion County-Green County 161 kV line near the existing tap location of EKPC's Marion County Industrial Tap. This transmission line will mostly traverse parallel to the existing Marion County Industrial Tap. The locations where the Marion County Industrial 161 kV Tap Line Loop-In is not parallel is because of constructability constraints. The Marion County Industrial 161kV Tap Line Loop-In will be 2.2 miles in length and will utilize approximately 20 galvanized steel poles, which will resemble the typical structure drawings attached as Exhibit 6. EKPC will install three (3) phases of 795 MCM ACSR conductor, and two (2) shield wires. One (1) shield wire will be a 7no7 alumoweld shield wire, and one (1) shield wire will be an optical ground wire which EKPC utilizes for its own telecommunication infrastructure needs. EKPC will be seeking a 75-foot ROW in locations where the ROW will be located adjacent to EKPC's existing ROW. The transmission structures on the new ROW will be located on the edge of the existing easement of the current Marion County Industrial Tap and 75 feet of the ROW will be on the opposite side. In locations where EKPC cannot build directly adjacent to its existing ROW, EKPC will be seeking a 100-foot ROW.

Q. WHAT ARE THE ESTIMATED CONSTRUCTION COSTS FOR EACH ELEMENT OF THE PROPOSED PROJECT?

A. The Metts Drive 161 kV Substation has an estimated cost of \$3,782,240.

Major Equipment & Materials - \$2,316,083 (RUS Account 346000) 1 2 Construction Labor - \$868,250 (RUS Account 341000) Owner's Engineer - \$164,407 (RUS Account 345000) 3 Owner's Costs - \$433,500 (RUS Account 345000) 4 The Metts Drive 161kV Transmission Tap will have an estimated cost of 5 \$2,543,493. 6 Major Equipment & Materials - \$823,610 (RUS Account 346000) 7 Construction Labor - \$468,000 (RUS Account 341000) 8 Owner's Engineer - \$303,463 (RUS Account 345000) Owner's Costs - \$762,280 (RUS Account 345000) 10 Miscellaneous Contracts - \$186,140 (RUS Account 340000) 11 The Marion County Industrial 161 kV Tap Line Loop-In will have an estimated 12 cost of \$4,188,733. 13 14 Major Equipment & Materials - \$1,679,218 (RUS Account 346000) Construction Labor - \$864,000 (RUS Account 341000) 15 Owner's Engineer - \$244,958 (RUS Account 345000) 16 17 Owner's Costs - \$603,750 (RUS Account 345000) Miscellaneous Contracts - \$796,807 (RUS Account 340000) 18 Q. WILL THE PROJECT MATERIALLY AFFECT THE FINANCIAL 19 20 **CONDITION OF EKPC?** The project will not materially affect the financial condition of EKPC. 21 A. HOW IS EKPC PLANNING TO FINANCE THE COSTS OF THE 22 Q.

PROPOSED PROJECT?

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1	A.	EKPC plans to initially finance the Project with general funds and later refinance
2		the Project and other investments through long-term debt issued by the Rural
3		Utilities Service (RUS) or other lenders.

Q. PLEASE DESCRIBE THE PROCESS TAKEN BY EKPC TO EVALUATE THE BEST POSSIBLE ROUTE FOR THE TRANSMISSION LINE AND WHAT FACTORS WERE INCLUDED IN THAT ANALYSIS.

A.

For these transmission lines, EKPC followed the EPRI-Kentucky Transmission Line Siting Methodology. EKPC engaged the experts at NV5 Geospatial to perform a Transmission Route Selection to determine the routing of both the Metts Drive 161 kV Tap and the Marion County Industrial 161 kV Tap Line Loop-In.

In accordance with the methodology, NV5 Geospatial developed Macro Corridors based on the GIS information from publicly available data. The publicly available data is used to identify features and a suitability value is assigned in accordance with the EPRI-KY Transmission Line Siting Methodology. Macro Corridors are developed for each of the three environments – Built, Natural and Engineering – and those values are utilized in the development of the Simple Average Alternative Corridor. The top five percent scores are utilized to create a final Phase 1 Study Area.

After the Phase 1 Study Area is developed, NV5 Geospatial created suitability surfaces in accordance with the EPRI – KY Transmission Line Siting Methodology. NV5 Geospatial completed a suitability surfaces analysis and provided weighting for features within the study area. The weighting and features analyzed in the Suitability model were defined during the development of the KY

Siting Model, with input from stakeholders throughout the Commonwealth. Suitability surfaces were created for each of the three environments: Built, Natural, and Engineering.

From the suitability surfaces, NV5 Geospatial developed the Composite Alternate Corridor. More information regarding the development of the Composite Alternate Corridor is included in the NV5 Geospatial report included and found in Exhibits 22 and 23 of the Application which reflect the siting studies of the Metts Drive 161kV Tap and the Marion County Industrial 161kV Tap Line Loop-In respectively. The standard siting methodology utilizes the top 5% scores for the Alternate Corridor development; however, based on the "short" nature of these transmission lines, the team had concerns about the 5% composite corridor potentially minimizing the feasible transmission routes and elected to utilize the top 10% alternative corridors for routing. This allowed for a more inclusive and robust analysis.

Once EKPC received the Alternative and Composite Corridors, two EKPC routing teams completed field reconnaissance to determine viable and constructible routes. Within this study's context, these potential centerline routes are called Alternate Routes. Each individual route is then scored using the EPRI KY Scoring Methodology. Once routes are scored, perspective weights are applied for final route scores.

The Expert Judgement scoring criteria were established prior to receiving route scoring from NV5 Geospatial. The intent of Expert Judgement is to evaluate project factors or impacts that are specific to the area and the project in question

but are not captured in the standard model. EKPC discussed and determined the Expert Judgement criteria and weighting that would be utilized for the project.

Following receipt by EKPC of NV5's route scoring, the project team agreed that the routing study objectively and quantitatively selected the best routes for both the Metts Drive 161kV Tap and the Marion County Industrial 161 kV Tap Line Loop-In and that there was no need to utilize the expert judgement scoring criteria.

Q. WHAT WAS THE OUTCOME OF THE SITING STUDY?

A.

A. EKPC received the route scores from NV5 which identified Route 5 found in Exhibit 22 to the Application as the best alternative route for the Marion County Industrial 161 kV Tap Line Loop-In transmission line. Route 5 found in Exhibit 21 was identified as the best alternative route for the Metts Drive 161 kV Tap transmission line.

Q. PLEASE EXPLAIN WHY CO-LOCATION ON ANY EXISTING EKPC ROW WAS NOT VIABLE.

The Marion County Industrial 161 kV Tap Line Loop-In was deemed unsuitable for co-location along EKPC's existing Marion County Industrial Tap due to constructability constraints. This existing tap operates as a radial line, meaning there is no alternative transmission source available to maintain the energization of the substations it serves; specifically, the Marion County Industrial Substation and the South Marion County Industrial Substation. Given this limitation, there isn't a cost-effective, safe, or reliable method to serve these substations other than through EKPC's existing Marion County Industrial Tap.

The transmission structures along the existing Marion County Industrial Tap would experience structural overload, as they weren't originally designed to support two transmission circuits. Additionally, the ground clearance on this line isn't sufficient to accommodate the addition of a new transmission circuit. Hence, constructing a new circuit on its dedicated right-of-way (ROW) and paralleling EKPC's existing ROW where feasible is considered the optimal approach.

Furthermore, separating the two transmission circuits onto distinct structures and ROWs effectively mitigates the risk of cascading failures. Cascading failures in transmission line infrastructure are triggered by the loss of an angle or deadend structure, typically during severe storm events, initiating a chain reaction of structural failures. This occurs as the sudden redistribution of loads onto adjacent tangent structures surpasses their intended capacity, leading to mechanical overloads and stresses on various structural components, such as poles and support arms. There was no viable transmission line ROW for co-location for the Metts Drive Transmission Tap.

Q. WHAT PERMITS WILL BE REQUIRED FOR THE PROJECT(S)?

17 A. Please see Exhibit 2 of the Application for the list of permits required for the Marion
18 County Industrial 161 kV Tap Line Loop-In and the Metts Drive 161 kV Tap
19 transmission line projects.

Q. HAS EKPC APPLIED FOR OR RECEIVED ANY OF THE PERMITS OR APPROVALS NECESSARY FOR THIS PROJECT?

A. EKPC has not applied for any state or local permits. The permits that will be required for this project are outlined in Exhibit 2.

1 Q. WILL THE PROJECT RESULT IN UNNECESSARY DUPLICATION OF

2 INVESTMENT OR THE CLUTTERING OF THE LANDSCAPE WITH UN-

3 **NEEDED FACILITIES?**

- A. Each of the discussed projects fulfills a critical electrical requirement, as substantiated in Darrin Adams' testimony. The implementation of the Metts Drive 161kV Tap is required to energize the planned 161kV distribution substation, which will replace EKPC's existing Lebanon Substation. Furthermore, the Marion County Industrial 161kV Tap Line Loop-In is indispensable for upholding reliability in the region, particularly in light of the heightened MW-mile exposure resulting from the introduction of the 'Metts Drive Substation
- Q. ARE THERE ANY PUBLIC UTILITIES, CORPORATIONS OR PERSONS
 WITH WHOM THE PROJECT IS LIKELY TO COMPETE?
- 13 A. No.

23

14 Q. WHAT BENEFITS WILL BE DERIVED FROM THIS PROJECT?

15 A. The establishment of the Metts Drive Substation and its associated tap is vital for 16 addressing anticipated distribution-substation and distribution-feeder loading 17 challenges linked to the Lebanon Substation. However, the introduction of the 18 Metts Drive Substation would increase the MW-mile exposure on the existing 19 Marion Industrial Tap without other transmission modifications in the area. This 20 underscores the necessity of implementing the Marion County Industrial 161kV 21 Tap Line Loop-In Project. For a comprehensive understanding of the project's 22 advantages, please refer to the detailed testimony provided by Darrin Adams.

Q. WHAT IS THE TIMELINE FOR COMPLETION OF THE PROJECT(S)?

- 1 A. The proposed in-service date for all the projects discussed is December 2025.
- **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**
- 3 A. Yes.

Exhibit 3 Permits and Franchises

Exhibit 3 – Metts Drive Transmission Tap Environmental Permitting and Approvals

RUS National Environmental Policy Act Approval

- 1. US Fish and Wildlife Service Section 7 Coordination
 - 1. endangered species review
- 2. Federally Designated Indian Tribe Section 106 Review
- 3. State Historic Preservation Office Section 106 Review
 - 1. Archaeology and Cultural Historic surveys
- 4. Natural Resource Conservation Service
 - 1. Prime Farmland and Hydric soils data request
- 5. Archeological Resources Protection Act, 16 U.S.C. 470aa et seq.
- 6. Clean Air Act, 42 U.S.C. 7401 et seq.
- 7. Clean Water Act, 33 U.S.C. 1251 et seq.
- 8. Comprehensive Environmental Response, Compensation, & Liability Act, 42 U.S.C. 9601 et seq.
- 9. Endangered Species Act, 16 U.S.C. 1531 et seq.
- 10. Farmland Protection Policy Act, 7 U.S.C. 4201 et seq.
- 11. National Environmental Policy Act, 42 U.S.C. 4321 et seq.
- 12. National Historic Preservation Act, 16 U.S.C. 470 et seq.
- 13. Native American Graves Protection and Repatriation Act of November 16, 1990 (P.L. 101-601, 104 Statute 3048; 25 USC 3001-3013)
- 14. Resource Conservation & Recovery Act, 42 U.S.C. 6901 et seq.
- 15. Solid Waste Disposal Act, 42 U.S.C. 3251
- 16. Safe Drinking Water Act, 42 U.S.C. 300 et seq.
- 17. E.O. 11514, Protection and Enhancement of Environmental Quality
- 18. E.O. 11593, Protection and Enhancement of the Cultural Environment
- 19. E.O. 11988, Floodplain Management
- 20. E.O. 11990, Protection of Wetlands
- 21. E.O. 12898, Environmental Justice
- 22. E.O. 13084, Consultation and Coordination with American Indian Tribes

US Army Corps Of Engineers

1. Nationwide Permit #57 – No Preconstruction Notification required

Kentucky Division of Water

- 1. General Water Quality Certification Nationwide Permit #57
- 2. General Floodplain Permit
- 3. KYR10 General Stormwater Permit for construction

Kentucky Transportation Cabinet

 TC99-211 – Overhead Utility Encroachment Diagram for Fully Controlled Highways

- 2. TC99-212 Overhead Utility Encroachment Diagram for Non-Fully Controlled Highways
- 3. TC-99-1A Application for Encroachment Permit

Additional Required Permits for Substation Work - in addition to those listed above

- 1. Phase I Environmental Site Assessment per ASTM 1527-13 (Fawkes Substation Expansion, Madison County Switching Station, Industrial Substation)
 - 1. Substation property acquisitions
- 2. CSX Railroad Crossing Permit (Madison County Switching Station)
- 3. KU Crossing Permit (Fawkes Substation Expansion Work)

Exhibit 4 Notice of Intent



Heather S. Temple heather@hloky.com (859) 368-8803

April 17, 2024

Via Electronic Filing

Ms. Linda C. Bridwell, P.E. Executive Director Kentucky Public Service Commission 211 Sower Boulevard Frankfort, KY 40602

Re: Electronic Application of East Kentucky Power Cooperative, Inc. for Certificates of Public Convenience and Necessity for Construction Projects in Marion County, Kentucky and other General Relief Case No. 2024-00108

Dear Ms. Bridwell:

Please let this letter serve as notice, pursuant to KRS 278.020, 807 KAR 5:001 and 807 KAR 5:120 that East Kentucky Power Cooperative, Inc. ("EKPC") plans to file on or after May 17, 2024, an Application for two Certificates of Public Convenience and Necessity ("CPCN") to construct two 161 kV electric transmission lines and infrastructure in Marion County, Kentucky. After the completion of a condition assessment showing reliability issues with the existing system in the area, EKPC has determined that both projects are necessary. This project will allow EKPC to continue to provide safe and reliable service to its Owner-Members and their end-use members as well as to add additional transmission capacity for future load growth in the area.

Pursuant to 807 KAR 5:120 Section 1(2)(a), EKPC's contact information is:

East Kentucky Power Cooperative, Inc. 4775 Lexington Road Winchester, KY 40391 (859) 744-4812

EKPC has filed a Notice to Use Electronic Filing Procedures in this case.

Please do not hesitate to contact me with any questions or concerns.

Sincerely,

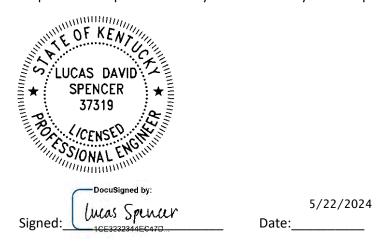
Heather S. Temple

Heather S. Temple

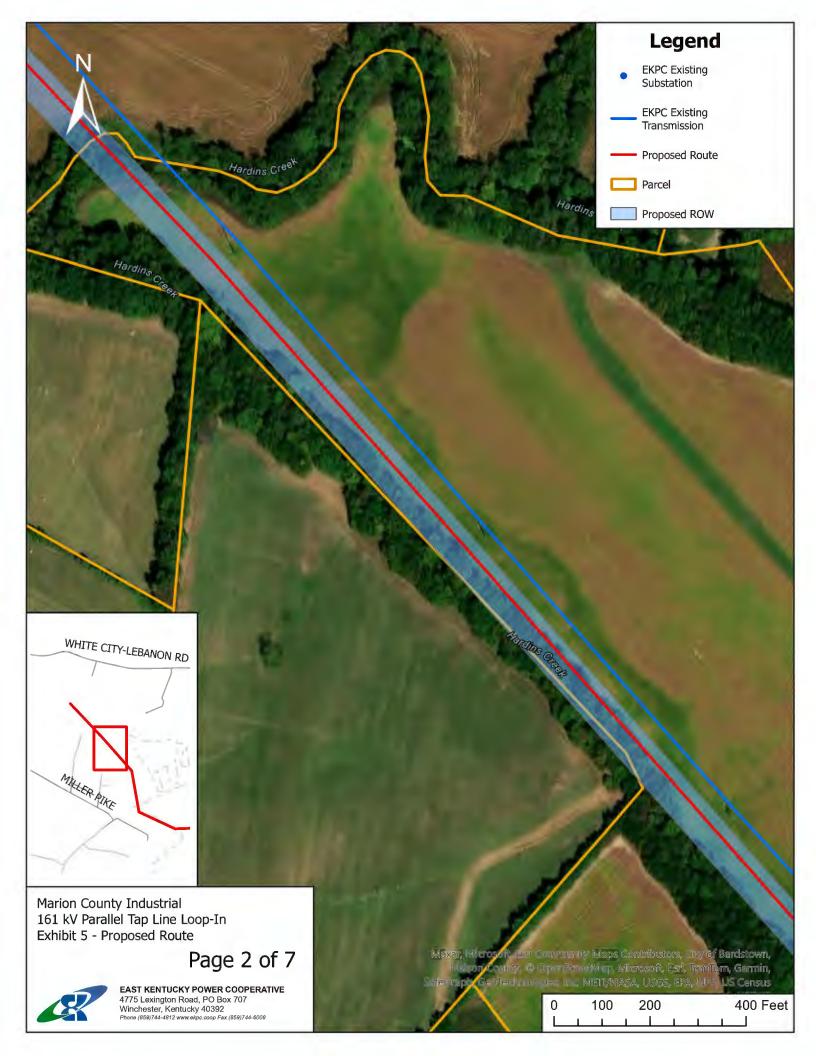
Exhibit 5 Map of Project Marion County Industrial 161 kV Tap Line Loop-In

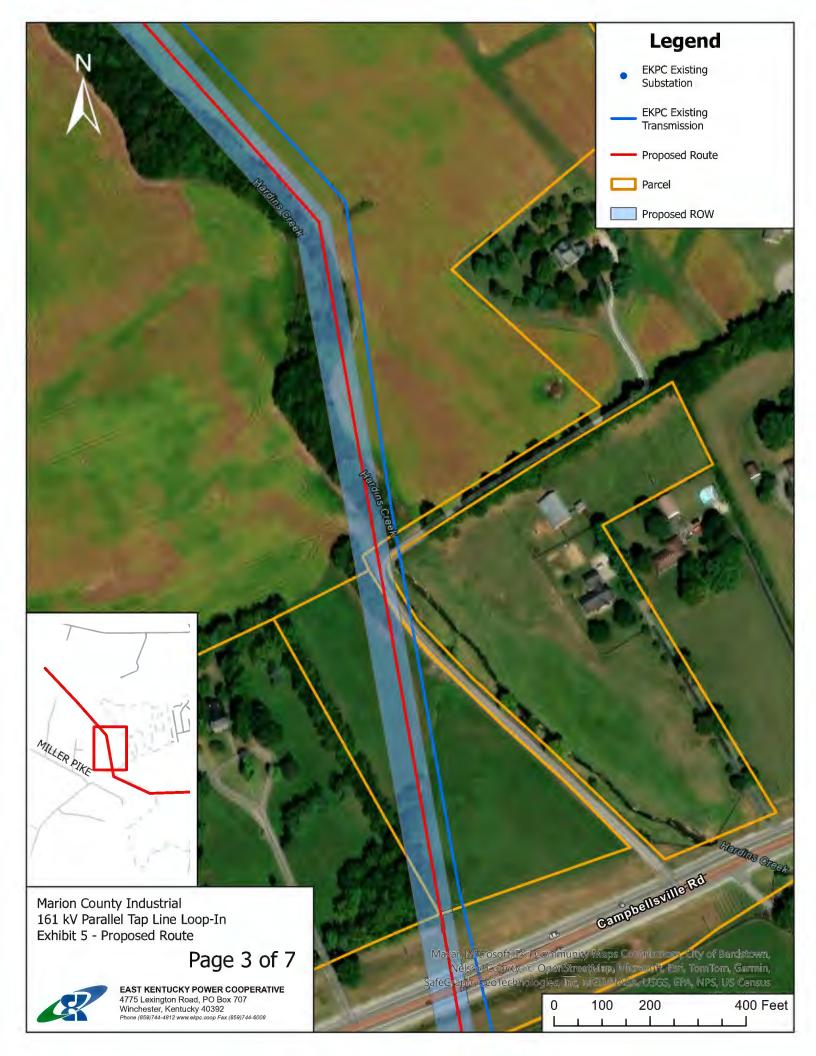
Exhibit 5 Cover Sheet

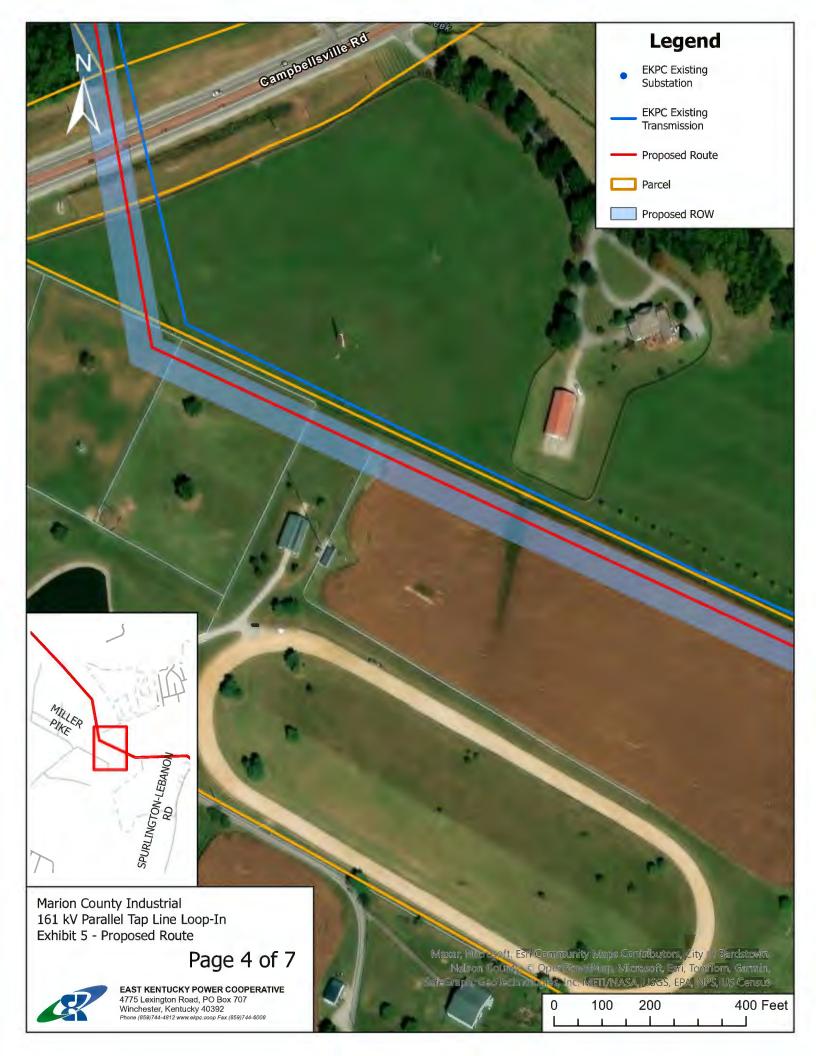
These maps are issued for the purpose of regulatory approval and do not represent survey-quality data. The information contained herein only serves as a conceptual depiction of the routes proposed. All maps were completed either by me or under my direct supervision.

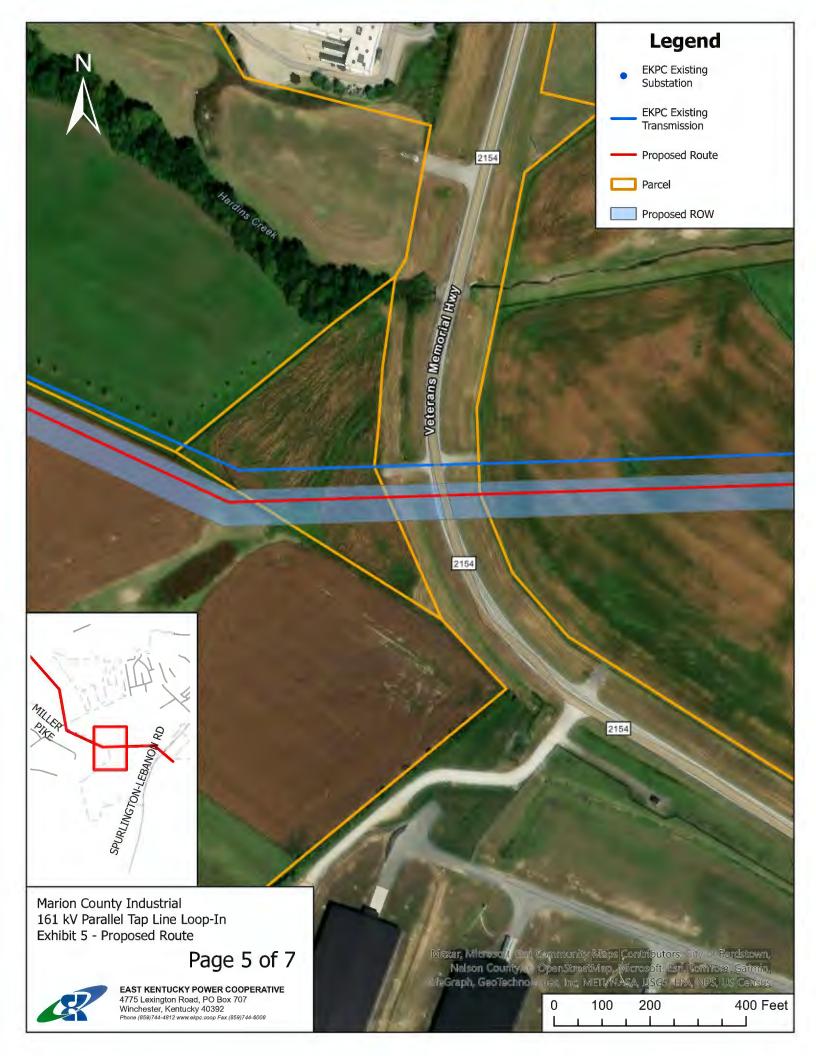


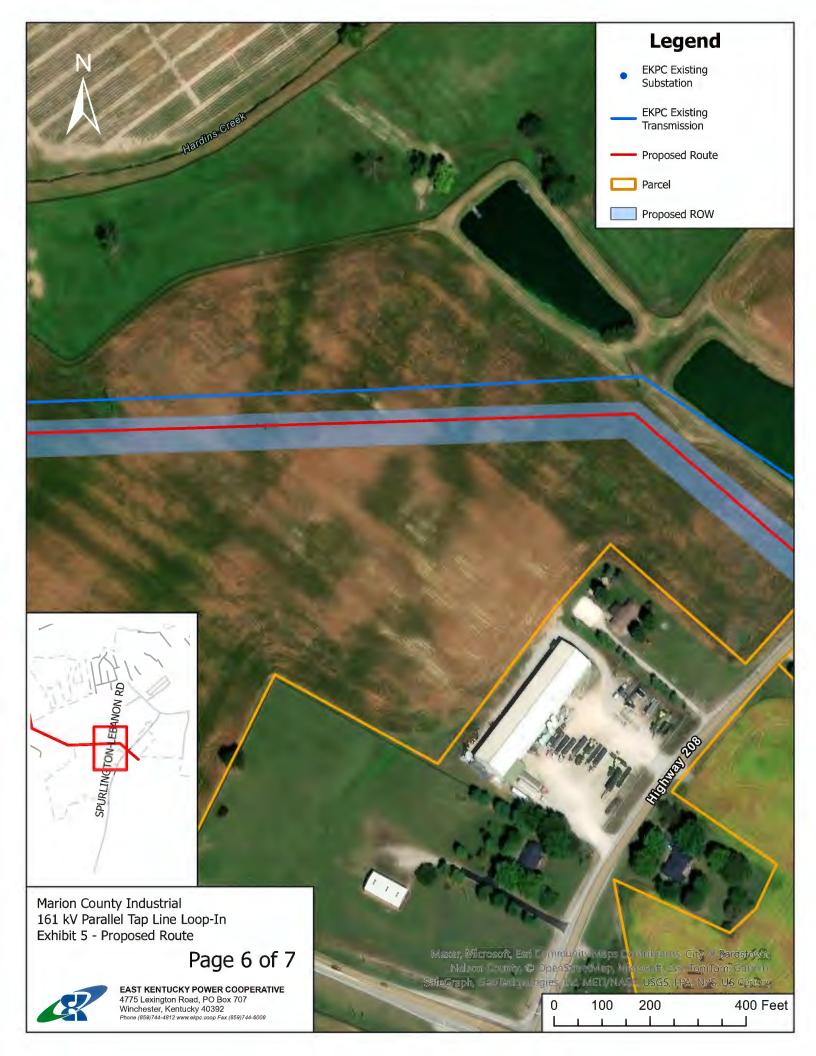












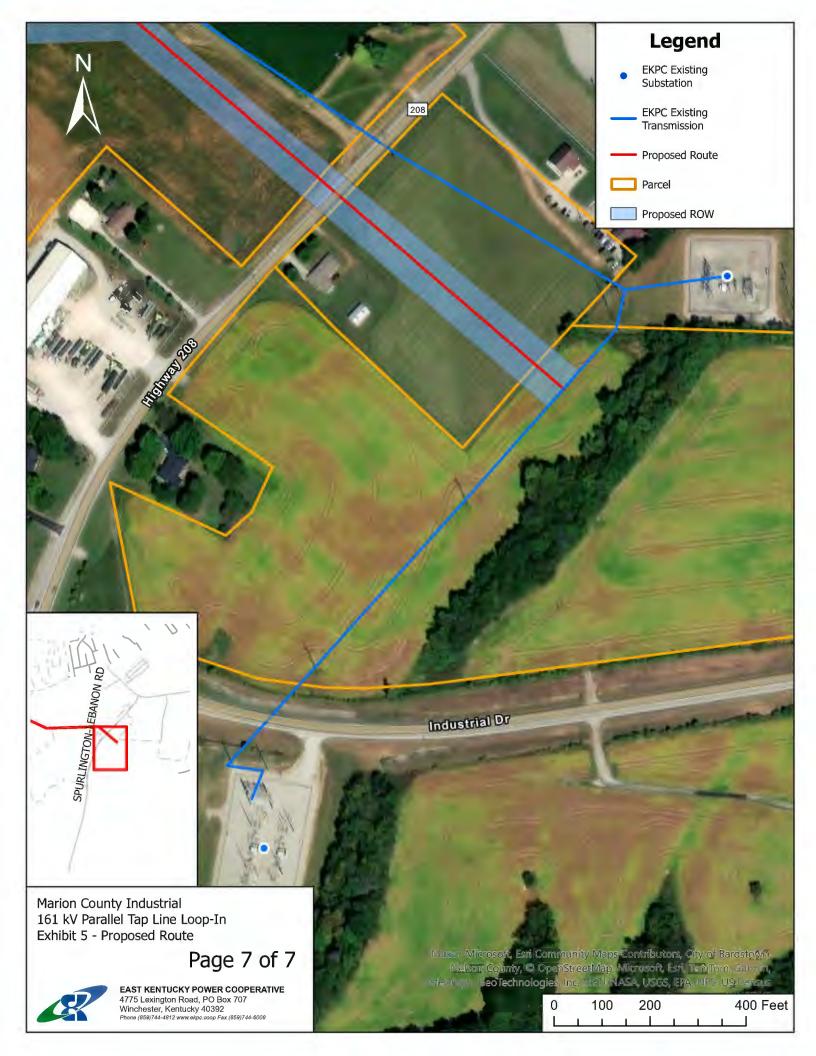
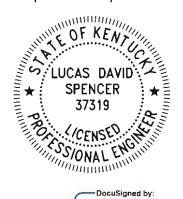


Exhibit 6 Map of Project Metts Drive 161 kV Tap

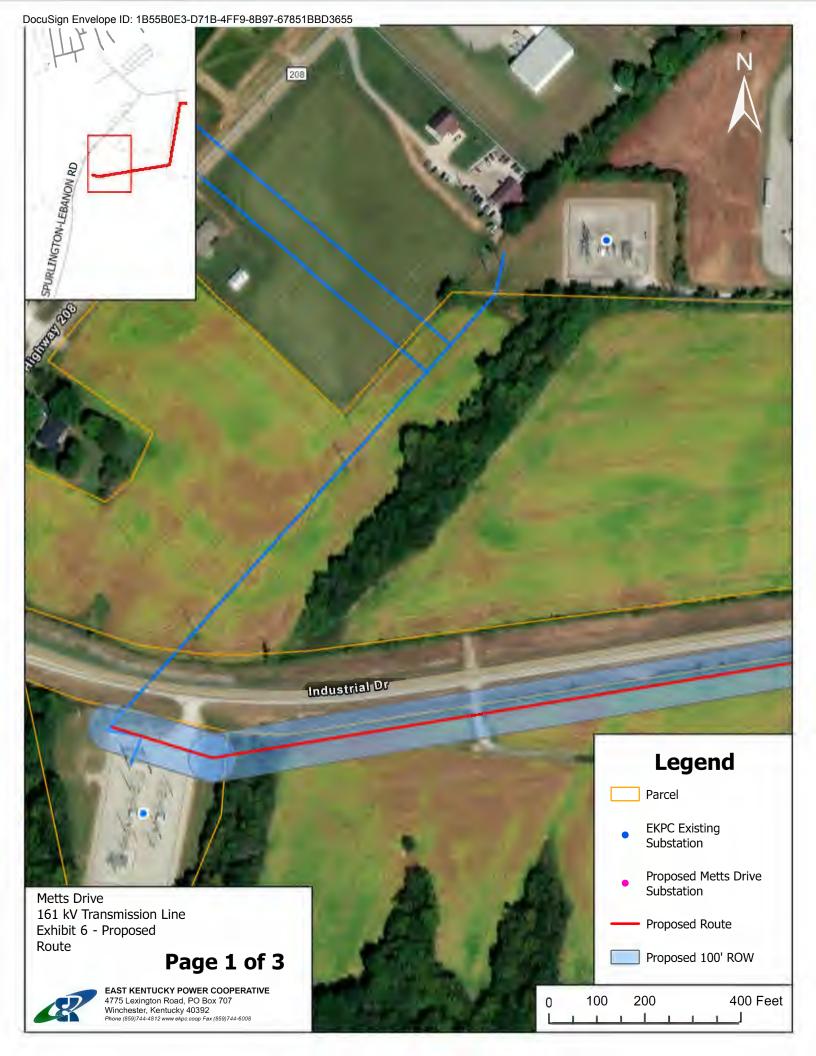
Exhibit 6 Cover Sheet

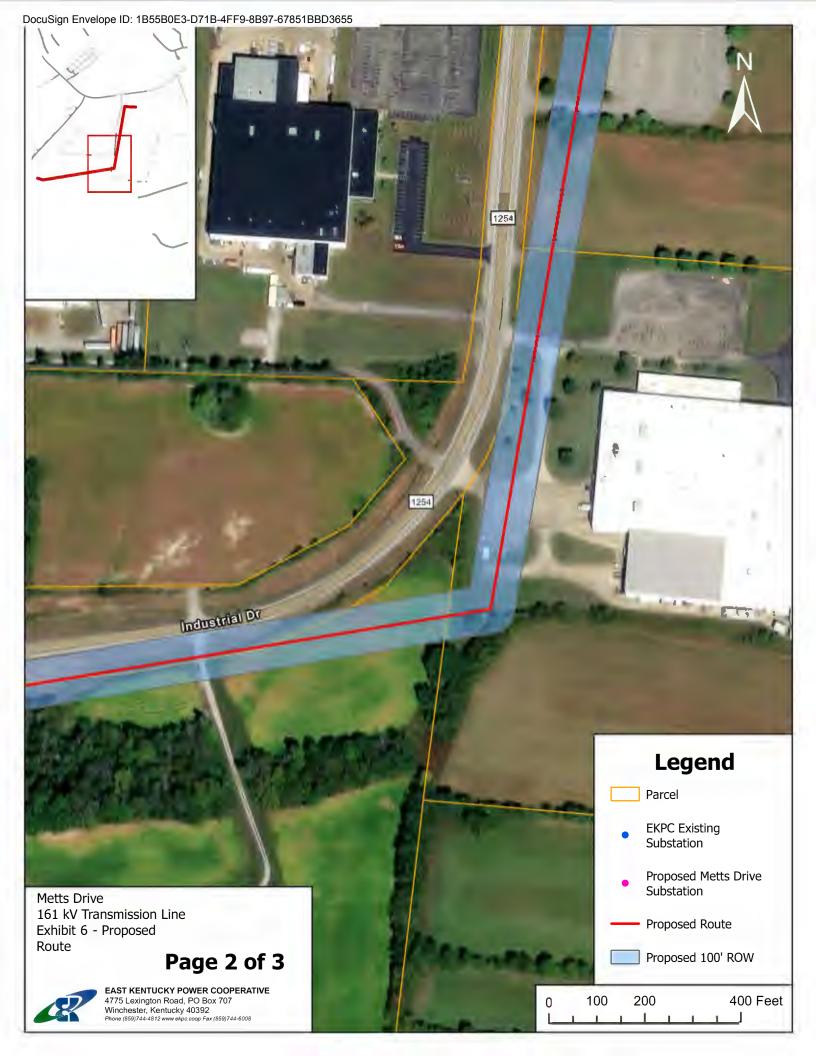
These maps are issued for the purpose of regulatory approval and do not represent survey-quality data. The information contained herein only serves as a conceptual depiction of the routes proposed. All maps were completed either by me or under my direct supervision.



Signed: Lucas Spencer

5/15/2024 Date:





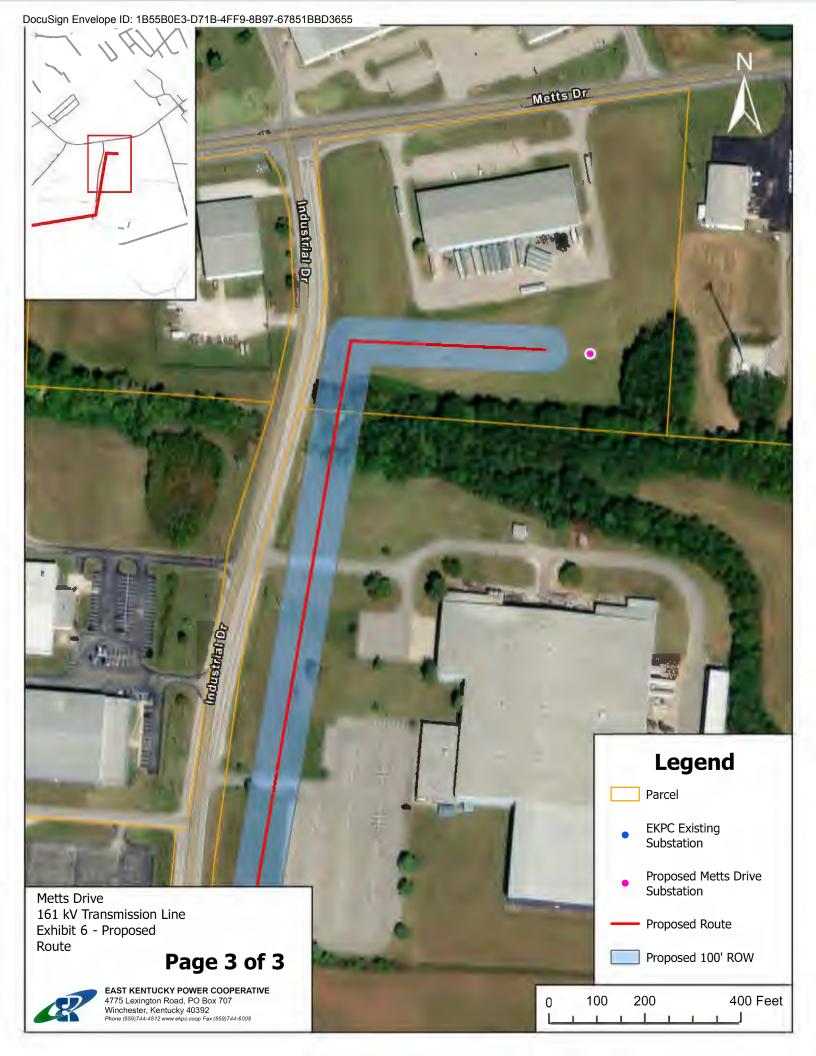


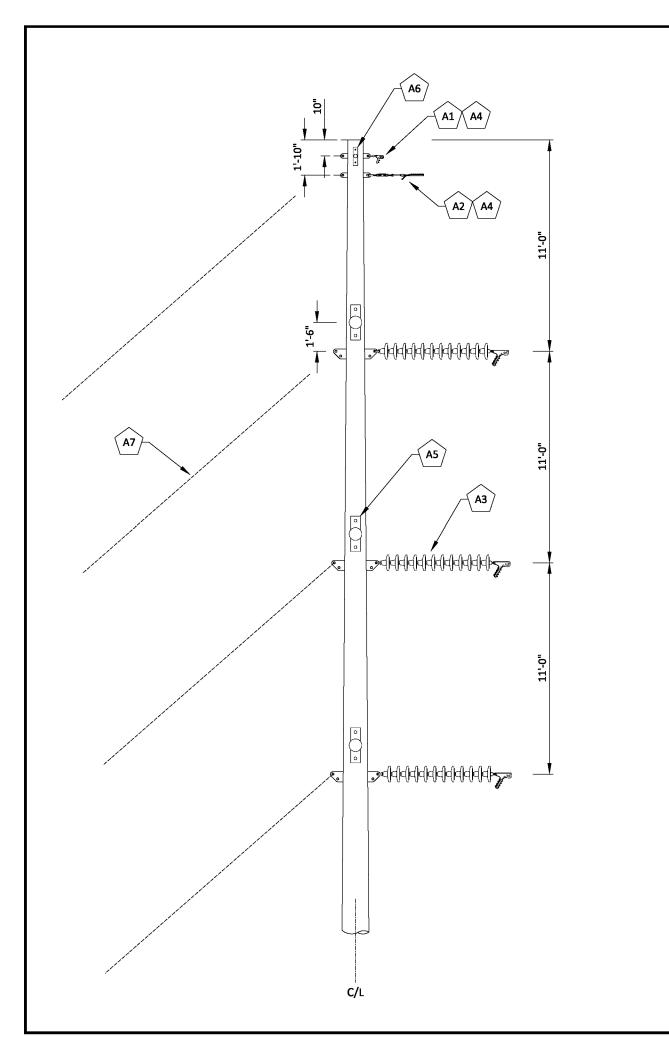
Exhibit 7 Typical Structure Sketches

Exhibit 7 Cover Sheet

These drawings are provided for regulatory approval purposes only and do not constitute detailed engineering designs. They are subject to revision and modification as the project progresses through detailed engineering and construction and as such shall not be used for construction without express permission by the engineer of record.

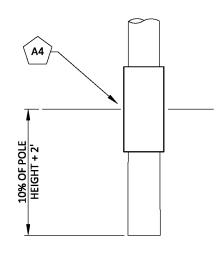


Signed:	Date:	5/15/2024



	LIST OF MATERIALS						
							DATE 1-25-2024
DWG.	QTY	EKPC ITEM ID	MANUFACTURER	PART #	DESCRIPTION	J. DAWN APPROVED	2-5-2024 DATE
KEF.		HEMID					
						REVISIONS	
						DESCRIPTION 0. RE-ISSED FOR REVIEW	DATE 11-27-2023
							+
1		1			I .		

	LIST OF ASSEMBLIES				
DWG. REF.	QTY	DESCRIPTION			
A1	1	TM-4E (OHGW DEADEND ASSY)			
A2	1	TM-DE1 (OPGW DEADEND ASSY)			
А3	3	TM-1E-161 OR TM-1E-POLY-161 (INSULATOR ASSY)			
A4	1	TM-9-SP2A (GROUNDING ASSY)			
A5	3	TM-HPJS-161 (POST INSULATOR JUMPER SUPPORT)			
A6	1	TM-OPGWJS (OPGW JUMPER SUPPORT ASSY)			
A7	*	GUYING ASSY (REFER TO PLAN & PROFILE SHEET)			



SETTING DEPTH

PLAN VIEW



EAST KENTUCKY
POWER COOPERATIVE
4775 LEXINGTON ROAD, PO BOX 707
WINCHESTER, KENTUCKY 40392

GENERAL NOTES

TRANSMISSION ENGINEERING STANDARD FRAMING DRAWING

FRAMING DESIGNATION
TS-9AS-161
STRUCTURE GROUP

STRUCTURE GROUP

DEADEND

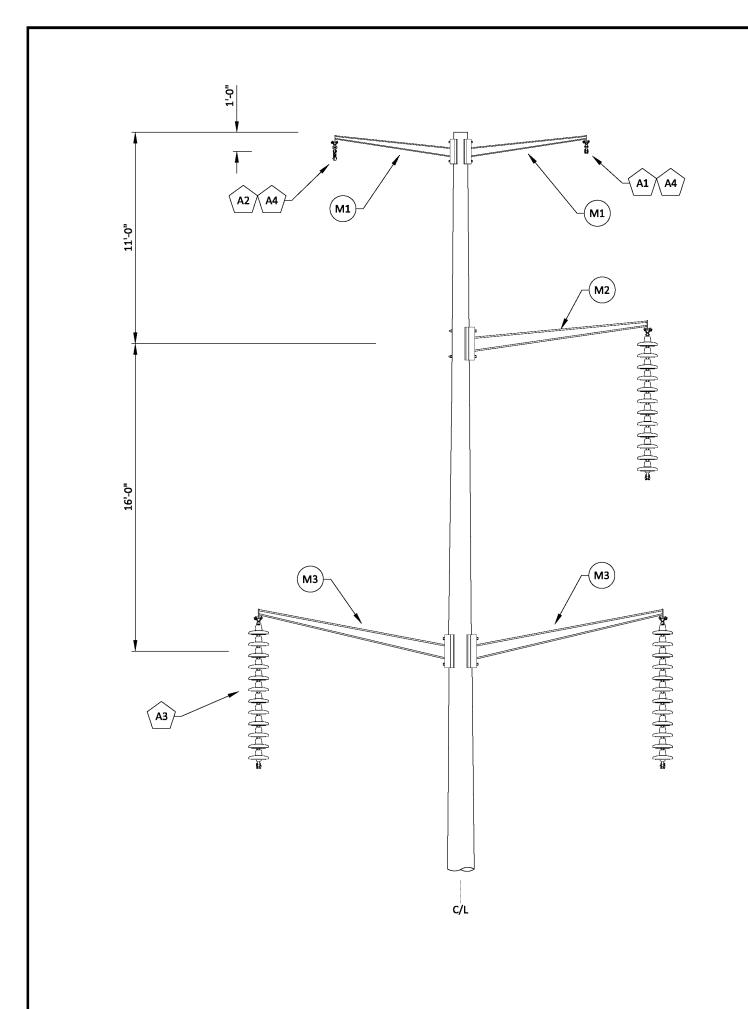
FRAMING MATERIAL POLE MATERIAL

FRAMING MATERIAL POLE MATERIAL # POLES

STEEL STEEL 1

DRAWING SCALE VOLTAGE REVISION

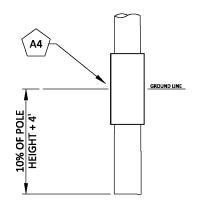
1" = 5' 161kV 0



	LIST OF MATERIALS							
DWG. REF.	QTY	EKPC ITEM ID	MANUFACTURER	PART #	DESCRIPTION	R. TERRILL REVIEWED J. DAWN APPROVED		
M1	2				ARM, STEEL DAVIT ARM, 6'	REVISIONS		
M2	1				ARM, STEEL DAVIT ARM, 9'	DESCRIPTION 0. RE-ISSUED FOR REVIEW		
М3	2				ARM, STEEL DAVIT ARM, 10'			

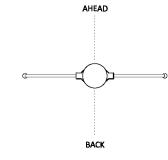
LIST OF ASSEMBLIES

DWG. REF.	QTY	DESCRIPTION
A1	1	TM-4B (OHGW ASSY)
A2	1	TM-SB (OPGW ASSY)
А3	3	TM-1AG-161 (INSULATOR ASSY)
A4	1	TM-9-SP2 (GROUNDING ASSY)



SETTING DEPTH

PLAN VIEW





GENERAL NOTES DAVIT ARMS AND CONNECTION HARDWARE
TO BE SUPPLIED BY STEEL POLE
MANUFACTURER.

APPROVALS

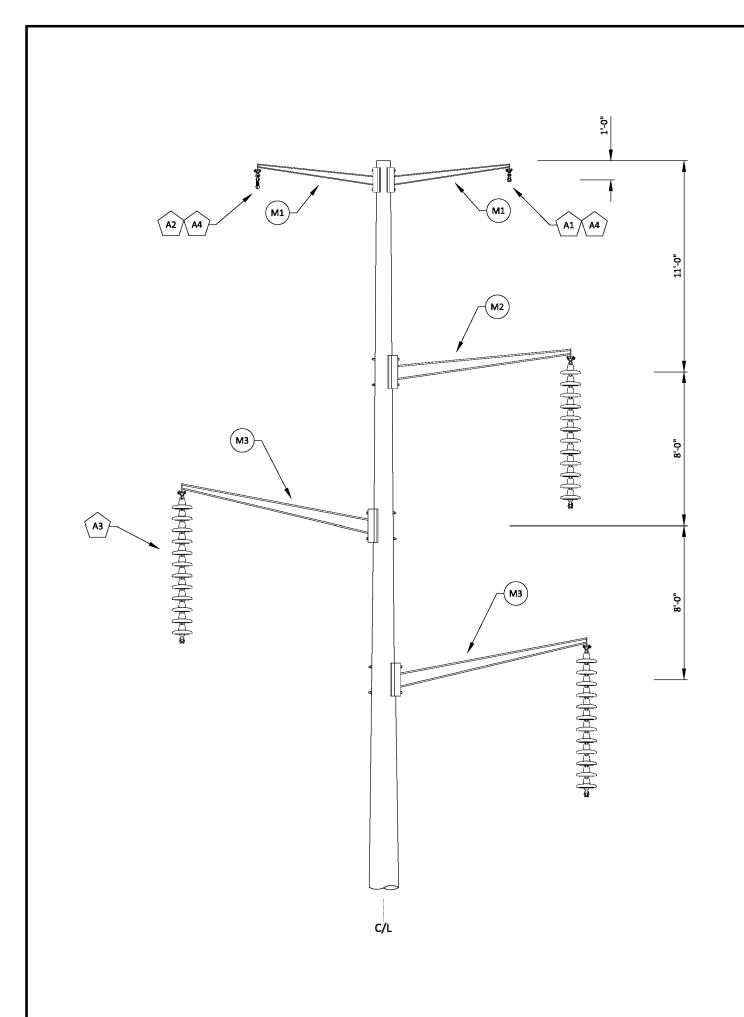
DATE 1-25-2024 DATE 2-5-2024

TRANSMISSION ENGINEERING

STANDARD FRAMING DRAWING
FRAMING DESIGNATION
TU-2AS-161
STRUCTURE GROUP

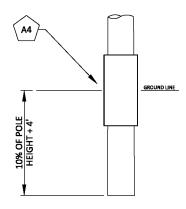
TANGENT

1 REVISION STEEL STEEL 1" = 5' 161kV



	LIST OF MATERIALS					APPROVALS	
			LI2	OF IVIA	41 EKIALS	DRAWN	DATE
1						R. TERRILL	1-25-2024
DWG.		EKPC				REVIEWED	DATE
REF.	QTY	ITEM ID	MANUFACTURER	PART #	DESCRIPTION	J. DAWN	2-5-2024
1,21.		112101113				APPROVED	DATE
M1	2				ARM, STEEL DAVIT ARM, 6'		
M2	1				ARM, STEEL DAVIT ARM, 9'	REVISIONS	
					<u>'</u>	DESCRIPTION	DATE
М3	2				ARM, STEEL DAVIT ARM, 10'	RE-ISSUED FOR REVIEW	1-25-2024

	LIST OF ASSEMBLIES				
DWG. REF.	QTY	DESCRIPTION			
A1	1	TM-4B (OHGW ASSY)			
A2	1	TM-SB (OPGW ASSY)			
А3	3	TM-1AG-161 (INSULATOR ASSY)			
A4	1	TM-9-SP2 (GROUNDING ASSY)			



SETTING DEPTH



GENERAL NOTES DAVIT ARMS AND CONNECTION HARDWARE
TO BE SUPPLIED BY STEEL POLE
MANUFACTURER.

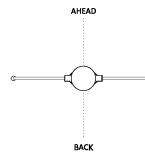
TRANSMISSION ENGINEERING

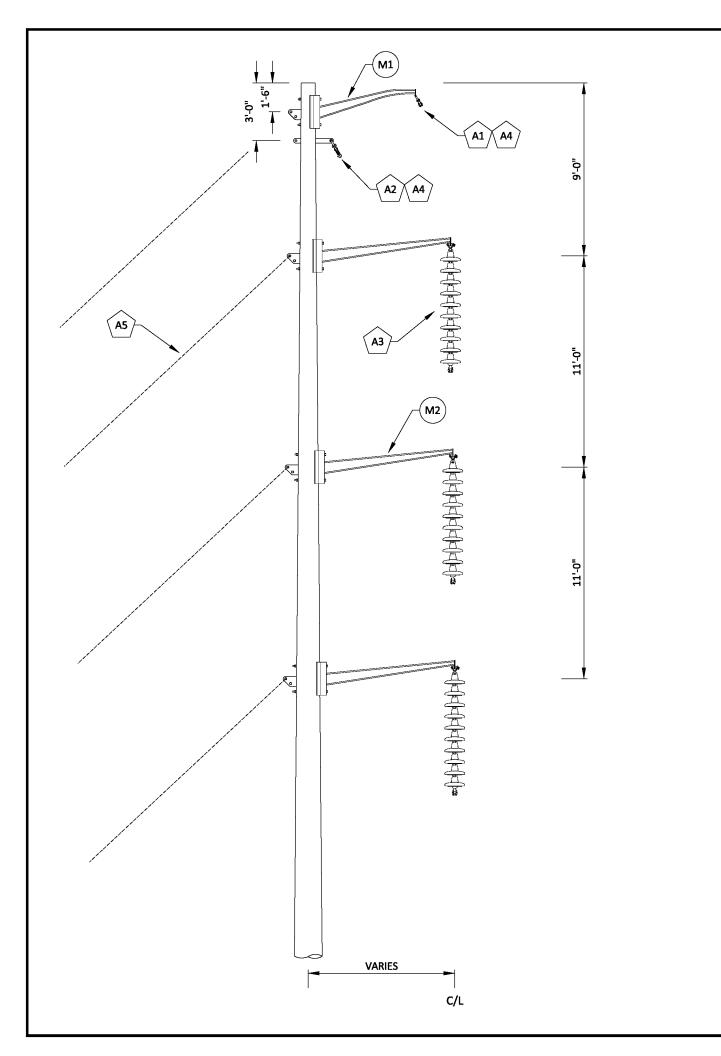
STANDARD FRAMING DRAWING
FRAMING DESIGNATION
TU-2S-161
STRUCTURE GROUP

TANGENT

FRAMING MATERIAL	POLE MATERIAL	# POLES
STEEL	STEEL	1
DRAWING SCALE	VOLTAGE	REVISION
1" = 5'	161kV	n







			110	TOFNA	ATERIALS	APPROVAL	
			LIS	OF IVIA	ATERIALS	DRAWN R. TERRILL	1-25-2024
DWG. REF.	QTY	EKPC ITEM ID	MANUFACTURER	PART #	DESCRIPTION	J. DAWN APPROVED	DATE 2-5-2024 DATE
M1	1				ARM, STEEL DAVIT ARM, 6'	REVISIONS	
M2	3				ARM, STEEL DAVIT ARM, 8'	DESCRIPTION D. RE-ISSUED FOR REVIEW	DATE 1-26-2024

LIST OF ASSEMBLIES

DWG. REF.	QTY	DESCRIPTION
A1	1	TM-4A (OHGW ASSY)
A2	1	TM-S (OPGW ASSY)
А3	3	TM-1AG-138 (INSULATOR ASSY)
A4	1	TM-9-SP2A (GROUNDING ASSY)
A5	*	GUYING ASSY (REFER TO PLAN & PROFILE SHEET)
	·	

GENERAL NOTES DAVIT ARMS AND CONNECTION HARDWARE TO BE SUPPLIED BY STEEL POLE MANUFACTURER.

- 2. TYPE 3 VANG FOR OPGW SUPPORT. REFER TO STANDARD STEEL POLE ATTACHMENTS DRAWING SPD-001 FOR DETAILS.

SETTING DEPTH

GROUND LINE

(A4)

10% OF POLE HEIGHT + 2'

PLAN VIEW

BACK

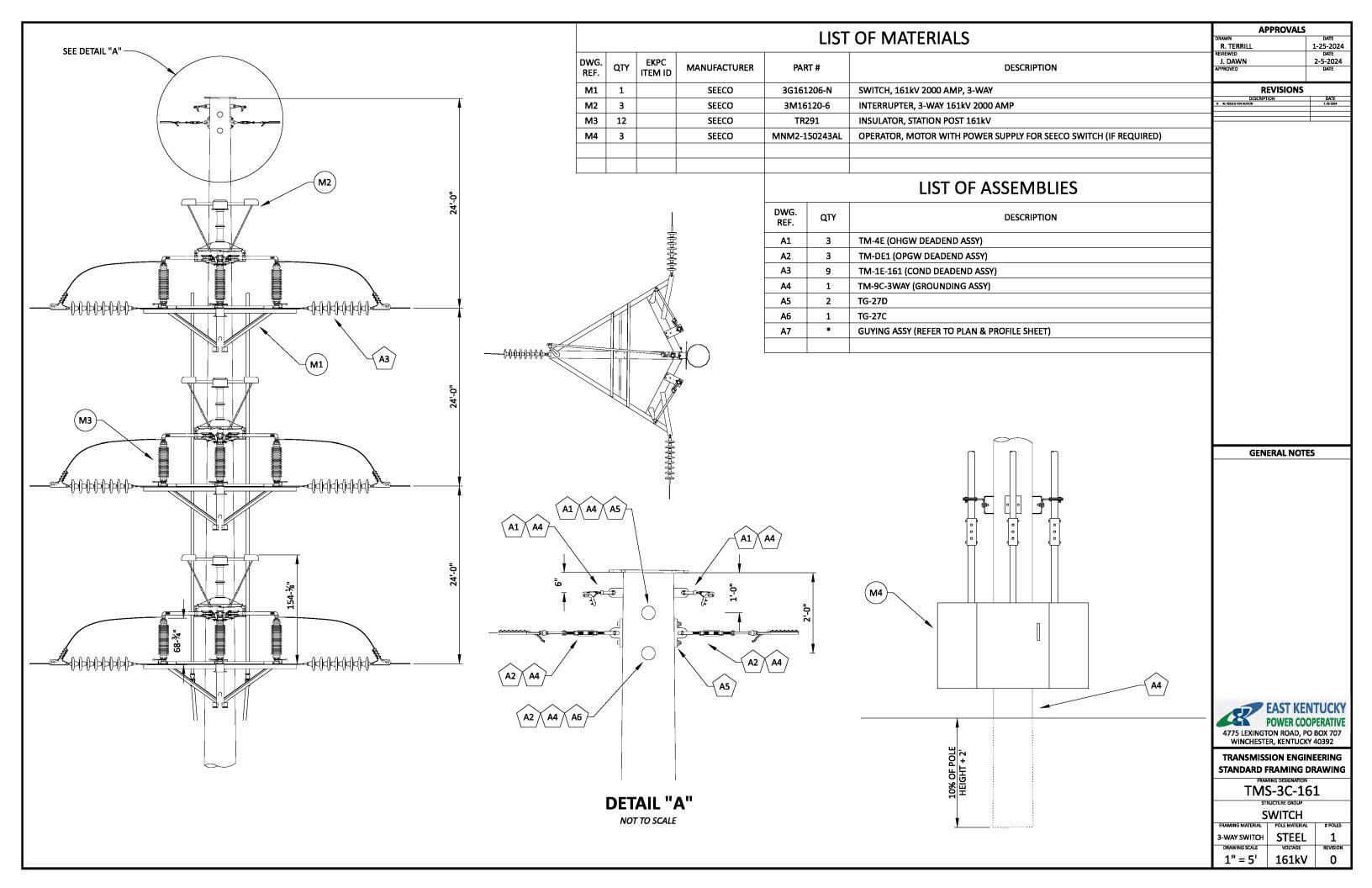


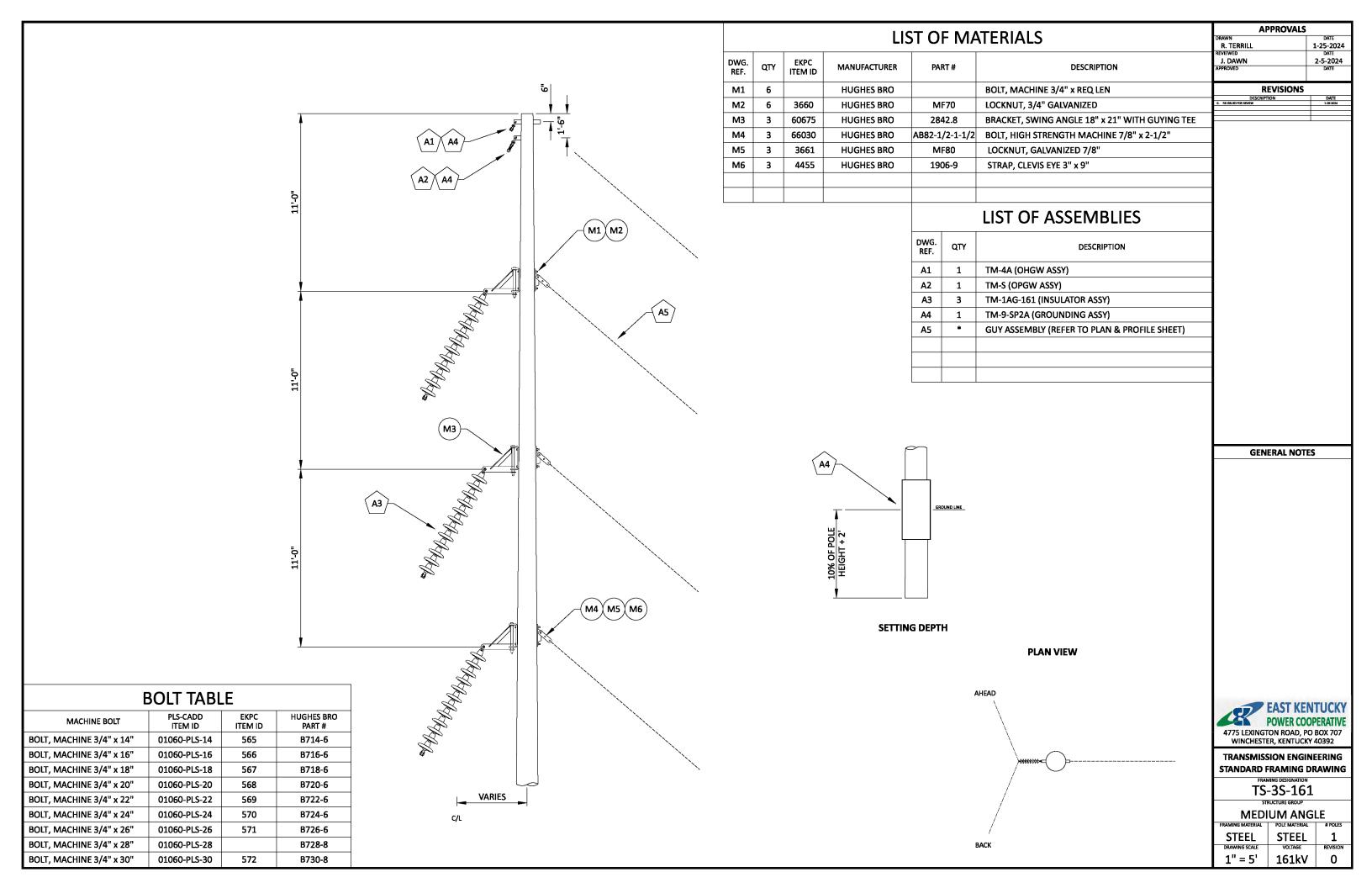
TRANSMISSION ENGINEERING STANDARD FRAMING DRAWING

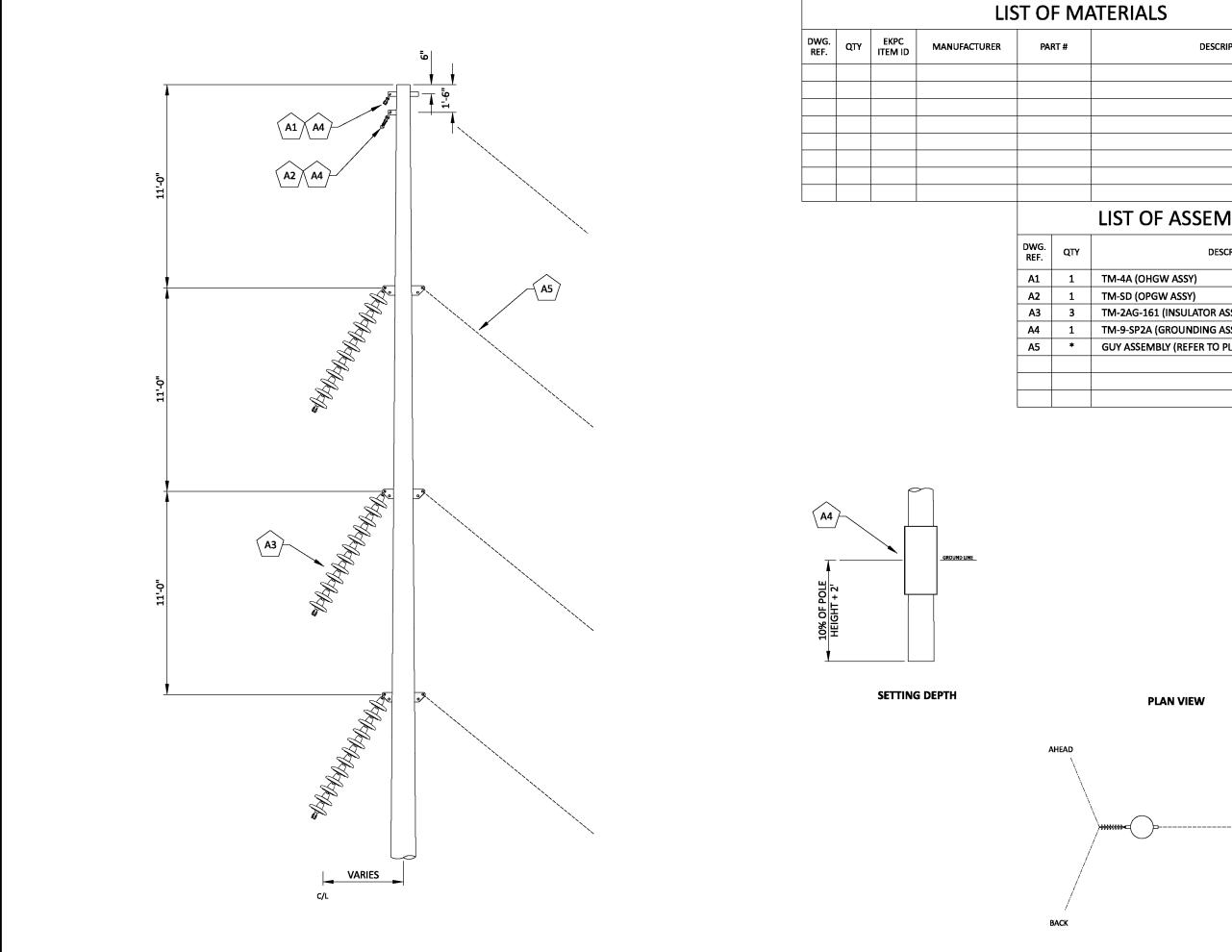
TU-3S-161

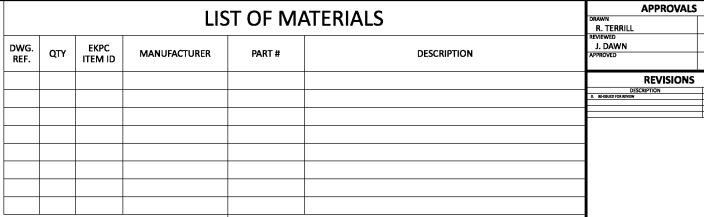
SMALL ANGLE

FRAMING MATERIAL	POLE MATERIAL	# POLES
STEEL	STEEL	1
DRAWING SCALE	VOLTAGE	REVISION
1" - 5'	1611//	n







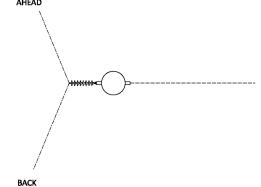


LIST OF ASSEMBLIES

DWG. REF.	QTY	DESCRIPTION
A1	1	TM-4A (OHGW ASSY)
A2	1	TM-SD (OPGW ASSY)
А3	3	TM-2AG-161 (INSULATOR ASSY)
A4	1	TM-9-SP2A (GROUNDING ASSY)
A5	*	GUY ASSEMBLY (REFER TO PLAN & PROFILE SHEET)

GENERAL NOTES

DATE 1-25-2024 DATE 2-5-2024





TRANSMISSION ENGINEERING

STANDARD FRAMING DRAWING
FRAMING DESIGNATION
TS-4S-161
STRUCTURE GROUP

LARGE ANGLE

FRAMING MATERIAL	POLE MATERIAL	# POLES
STEEL	STEEL	1
DRAWING SCALE	VOLTAGE	REVISION
1" = 5'	161kV	l n

