

KyPSC Case No. 2025-00228
TABLE OF CONTENTS

<u>DATA REQUEST</u>	<u>WITNESS</u>	<u>TAB NO.</u>
AIT-DR-01-001	Betsy Ewoldt.....	1
AIT-DR-01-002	Betsy Ewoldt.....	2
AIT-DR-01-003	Betsy Ewoldt.....	3
AIT-DR-01-004	Betsy Ewoldt.....	4
AIT-DR-01-005	Betsy Ewoldt.....	5
AIT-DR-01-006	Fred Trammel.....	6
AIT-DR-01-007	Fred Trammel.....	7
AIT-DR-01-008	N/A.....	8
AIT-DR-01-009	Fred Trammel.....	9
AIT-DR-01-010	Fred Trammel.....	10
AIT-DR-01-011	Fred Trammel.....	11

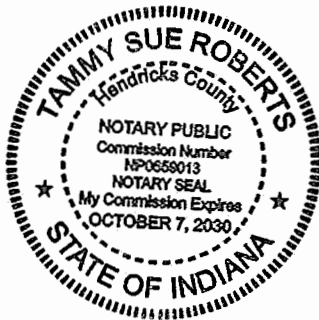
VERIFICATION

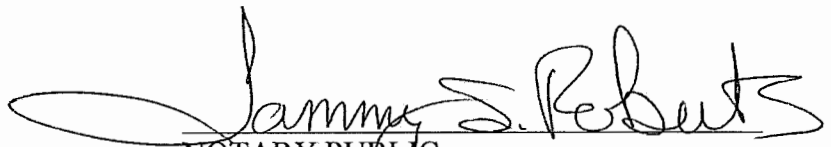
STATE OF INDIANA)
) SS:
COUNTY OF HENDRICKS)

The undersigned, Betsy Ewoldt, Lead PGO Siting Manager, 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.


Betsy Ewoldt, Affiant

Subscribed and sworn to before me by Betsy Ewoldt on this 29th day of
October 2025.



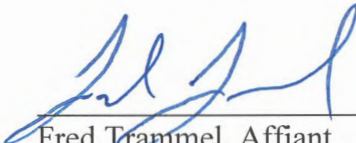

NOTARY PUBLIC

My Commission Expires: 10/7/2030

VERIFICATION

STATE OF OHIO)
) SS:
COUNTY OF HAMILTON)


The undersigned, Fred Trammel, Director PGO Project Management, being duly sworn, deposes and says that he has personal knowledge of the matters set forth in the foregoing data requests, and that the information contained therein is true and correct to the best of his knowledge, information, and belief.



Fred Trammel, Affiant

Subscribed and sworn to before me by Fred Trammel on this 28TH day of
October 2025.





NOTARY PUBLIC

My Commission Expires: 1/5/2029

**Duke Energy Ohio
Case No. 2025-00228
AIT's First Request for Information
Date Received: October 16, 2025**

AIT-DR-01-001

REQUEST:

Identify all alternatives routes for the Western Route that were considered by Duke Energy prior to filing the Application, and explain why those alternatives were not ultimately selected as the proposed path for the Western Route. Provide all reports, analyses, studies, or other data that support your response.

RESPONSE:

See Application Exhibit 2 - Route Selection Study to view all route alternatives that were considered prior to the Application submittal. See also the Company's responses to SITING BOARD STAFF-DR-01-003 and SITING BOARD STAFF-DR-01-004.

PERSON RESPONSIBLE: Betsy Ewoldt

Duke Energy Ohio
Case No. 2025-00228
AIT's First Request for Information
Date Received: October 16, 2025

AIT-DR-01-002

REQUEST:

Identify all possible alternative routes for the Western Route that do not involve intersecting AIT's property located at 7575 Thoroughbred Blvd, Florence, Kentucky 41042. Explain whether and why these alternative routes would be insufficient to allow Duke Energy to adequately construct the Western Route transmission line. Provide all reports, analyses, studies, or other data that support your response.

RESPONSE:

All the alternative routes that avoid potential impacts on the I-75/275 Interchange Project and avoid the Turfway Road central business corridor intersect AIT's property. Based on the plans for the I-75/275 Interchange Project and the Turfway Road central business corridor, available via DOT, alternative routes that were identified that would avoid AIT's property were found to be infeasible due to future road improvement and construction projects.

PERSON RESPONSIBLE: Betsy Ewoldt

**Duke Energy Ohio
Case No. 2025-00228
AIT's First Request for Information
Date Received: October 16, 2025**

AIT-DR-01-003

REQUEST:

Provide all nonprivileged documents and communications that relate to Duke Energy's consideration of alternative paths for the Western Route, including, specifically, documents and communications relating to the decision to have the Western Route cross AIT's property, rather than having the transmission line follow the existing property boundary.

RESPONSE:

Similar to the response to AIT-DR-01-002, Duke Energy Ohio considered alternative paths for the Western Route on AIT's property; however, due to unknown locations of waterbodies as well as additional turn angles that line route would need to take to construct the line following the property line, we cannot commit to amending the line to follow the property line until ground surveys have been completed.

PERSON RESPONSIBLE: Betsy Ewoldt

AIT-DR-01-004

REQUEST:

State whether it is your contention that an alternative route, in which the Western Route follows the existing property boundary of AIT's parcel, rather than intersecting the property, would make the proposed construction of the Western Route undesirable or infeasible. Provide all reports, analyses, studies, or other data that support your response.

RESPONSE:

Objection. This request requires the Company to engage in speculation and guesswork and seeks information that is unavailable and does not exist at this time. Without waiving said objections, and to the extent discoverable, since no easements or leases have been acquired for the Western Route, there are no studies or additional information available that would prove that a route that follows the existing property boundary of AIT's parcel would be infeasible. Based on publicly available data, such as National Hydrography Datasets, National Wetland Inventory, and topography data there is a waterbody on AIT's parcel that would potentially conflict with construction, access, etc. Additional information and studies are needed to determine the feasibility and potential impacts of an amended route along AIT's property boundary, which the Company is prepared to complete once this Application is approved.

PERSON RESPONSIBLE:

As to objection, Legal
As to response, Betsy Ewoldt

AIT-DR-01-005

REQUEST:

Confirm that the proposed Western Route will require easements that impose restrictions on the expansion of the existing distribution warehouse on AIT's parcel. If you so confirm, please identify the area containing the maximum permissible expansion boundaries for that warehouse consistent with the anticipated easements to be required for the proposed Western Route facilities. If there are associated height restrictions, material restrictions, or other restrictions, please identify all and explain why they are required.

RESPONSE:

Objection. This request is vague, ambiguous, and responding would require the Company to engage in speculation and guesswork regarding AIT's expansion. Duke Energy Ohio cannot confirm at this time with the plans that AIT has provided. The "expansion plans" received from AIT are more than 30 years old and were not spatially referenced making it impossible for Duke Energy Ohio to be able to confirm or deny any impacts or restrictions at this time. Once final design plans have been submitted by AIT, Duke Energy Ohio will be able to better evaluate what restrictions, if any will be necessary through easements. The Company is willing to continue to have open dialogue with AIT on the Western Route location to minimize impacts as much as possible.

PERSON RESPONSIBLE: As to objection, Legal
 As to response, Betsy Ewoldt

AIT-DR-01-006

REQUEST:

Please provide all reports, analyses, studies, or other data reflecting your estimation of the anticipated economic impact that the proposed Western Route will cause to AIT. Please provide this data for both: (i) all planning and construction activities associated with the proposed Western Route; and (ii) all operations and maintenance activities associated with the proposed Western Route following its placement into service.

RESPONSE:

Objection. This request is vague, ambiguous, overbroad, unduly burdensome and seeks information that does not exist. Moreover, this request is further objectionable insofar as it would require the Company to engage in speculation and guesswork as to AIT's operations. Duke Energy Ohio does not operate AIT's distribution warehouse. Without waiving said objection, and to the extent discoverable, the workplan for the construction sequence and schedule will be developed upon completion of the Engineering phase of the project. Currently, the estimated duration of the work proposed on AIT property would be 2-4 weeks, dependent on the final easement location and engineering plans.

- i) Anticipated economic impacts are not known at this time. A detailed construction plan would be developed upon the completion of our engineering phase. Some factors that we use in developing that plan and schedule would be, but not limited to, available system outages, pole types in the design, pole foundation locations, and any use of alternate construction methods such as helicopters.

- ii) Anticipated economic impacts are not known at this time. All operations and maintenance activities associated with the proposed Western Route following its placement into service will follow Duke Energy standards and protocols, along with any local, state, or federal protocols.

PERSON RESPONSIBLE: As to objection, Legal
As to response, Fred Trammel

AIT-DR-01-007

REQUEST:

Please provide all reports, analyses, studies, or other data evaluating the operational impacts to AIT's distribution warehousing operations at the property. Please provide this data for both: (i) all planning and construction activities associated with the proposed Western Route; and (ii) all operations and maintenance activities associated with the proposed Western Route following its placement into service.

RESPONSE:

Objection. This request is vague, ambiguous, overbroad, unduly burdensome and seeks information that does not exist. Moreover, this request is further objectionable insofar as it would require the Company to engage in speculation and guesswork as to AIT's operations. Duke Energy Ohio does not operate AIT's distribution warehouse. Without waiving said objection, and to the extent discoverable, the workplan for the construction sequence and schedule will be developed upon completion of the engineering phase of the project. Currently, the estimated duration of the work proposed on AIT property would be 2-4 weeks, dependent on the final easement location and engineering plans.

- i) Please see response to AIT-DR-01-006, subpart (i).
- ii) Please see response to AIT-DR-01-006, subpart (ii).

PERSON RESPONSIBLE: As to objection, Legal
 As to response, Fred Trammel

**Duke Energy Ohio
Case No. 2025-00228
AIT's First Request for Information
Date Received: October 16, 2025**

AIT-DR-01-008

REQUEST:

In the original document submitted by Applied Industrial Technologies, Inc., the data requests are numbered from Request No. 1-1 through 1-7 and go directly to Request No. 1-9 through 1-11. There is no Request No. 1-8.

RESPONSE:

Not applicable.

PERSON RESPONSIBLE: N/A

AIT-DR-01-009

REQUEST:

Please provide all reports, analyses, studies, or other data evaluating the anticipated cost of obtaining the easements necessary to construction of the Western Route, both: (i) in the aggregate; and (ii) specifically for those easements anticipated to be necessary for the Western Route to cross the AIT parcel.

RESPONSE:

Objection. This request is vague, ambiguous, overbroad, unduly burdensome and seeks information that does not exist. Moreover, this request is further objectionable to the extent it seeks information that is protected under the doctrines of attorney work product and privilege. Without waiving said objections, and to the extent discoverable, easements will be negotiated with individual landowners based upon fair market value of the land. The required easements would be determined upon completion of the Engineering phase of the overall project.

PERSON RESPONSIBLE:

As to objection, Legal
As to response, Fred Trammel

AIT-DR-01-010

REQUEST:

Please describe in detail all work (from planning through in-service date) anticipated to be required for that portion of the Western Route that crosses AIT's property. Please include anticipated timeframes, anticipated hours of work at the site on both a daily and weekly basis, the nature of work to be performed at the site, and all potential interference with AIT's distribution warehousing operations at the property.

RESPONSE:

Objection. This request is vague, ambiguous, overbroad, unduly burdensome and seeks information that does not exist. Moreover, this request is further objectionable insofar as it would require the Company to engage in speculation and guesswork as to "all potential interference with AIT's distribution warehousing operations." Without waiving said objections and to the extent discoverable, the workplan for the construction sequence and schedule will be developed upon completion of the engineering phase of the project. Currently, the estimated duration of the work proposed on AIT property would be 2-4 weeks, dependent on the final easement location and engineering plans.

PERSON RESPONSIBLE:

As to objection, Legal
As to response, Fred Trammel

Duke Energy Ohio
Case No. 2025-00228
AIT's First Request for Information
Date Received: October 16, 2025

AIT-DR-01-011

REQUEST:

Please identify all traffic- and access-related impacts that may affect the AIT property in connection with the proposed Western Route, including but not limited to all construction-related impacts that may impair existing access by tractor trailer and delivery truck access to the property. Please provide all reports, analyses, studies, or other data evaluating the same.

RESPONSE:

Traffic stoppages may be needed for wire pulling across driveways, and for pole deliveries to a specific pole location throughout the construction phase. These traffic stoppage moments would be planned during our planning phase, pending the completion of our Engineering phase.

PERSON RESPONSIBLE: Fred Trammel