

COMMONWEALTH OF KENTUCKY
BEFORE THE KENTUCKY STATE BOARD ON
ELECTRIC GENERATION AND TRANSMISSION SITING

In the Matter of:

APPLICATION OF SOUTHERN INDIANA GAS &)	
ELECTRIC CO. D/B/A VECTREN ENERGY)	
DELIVERY OF INDIANA, INC. FOR A)	CASE NO.
CERTIFICATE TO CONSTRUCT AN ELECTRIC)	2010-00223
TRANSMISSION LINE FROM ITS A.B. BROWN)	
PLANT TO THE BIG RIVERS REID EHV)	
STATION)	

SITING BOARD STAFF'S FIRST INFORMATION REQUEST
TO HENDERSON MUNICIPAL POWER & LIGHT

Henderson Municipal Power & Light ("HMP&L"), pursuant to 807 KAR 5:001, is to file with the Commission the original and 10 copies of the following information, with a copy to all parties of record. If a requested document consists of 20 or more pages, HMP&L may file two copies. The information requested is due no later than September 13, 2010. Responses to requests for information shall be appropriately bound, tabbed and indexed. Each response shall include the name of the witness responsible for responding to the questions related to the information provided.

Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

HMP&L shall make timely amendment to any prior response if it obtains information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which HMP&L fails or refuses to furnish all or part of the requested information, HMP&L shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention should be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations.

1. Refer to page 2 of HMP&L's August 16, 2010 Motion for Intervention, in which HMP&L states that "the proposed route for the Vectren line directly and adversely affects HMP&L substation property and transmission lines which are central to the operations of HMP&L."

a. Explain in detail HMP&L's assertion that the proposed route for the transmission line proposed in Vectren's July 15, 2010 application in this case "will directly and adversely [affect] HMP&L substation property and transmission lines."

b. Provide any data, reports, analyses, or any other information in HMP&L's possession which support HMP&L's assertions regarding adverse effects on HMP&L's substation property and transmission lines from Vectren's proposed transmission line.

2. Refer to page 2 of HMP&L's August 16, 2010 Motion for Intervention, in which HMP&L states that:

the location of the proposed Vectren line to HMP&L's existing transmission lines including, but not limited to, the existing 161 kV transmission line which runs from HMP&L's Substation 4 to a location near HMP&L's Station Two Generation Plant will be detrimental to the future operations of the lines and compromise existing system reliability.

a. Explain in detail HMP&L's assertion that the proposed route for the transmission line proposed in Vectren's July 15, 2010 application in this case "will be detrimental to the future operations of the lines and compromise existing system reliability."

b. Provide any data, reports, analyses, or any other information in HMP&L's possession which support HMP&L's assertions regarding adverse impacts on the future operations of HMP&L's power lines and HMP&L's existing system reliability from Vectren's proposed transmission line.

3. Refer to page 2 of HMP&L's August 16, 2010 Motion for Intervention, in which HMP&L states that "the proposed route of the Vectren line will adversely affect HMP&L's existing substation property, transmission lines, and ability to provide reliable electric service for its existing and future customer base."

a. Explain in detail HMP&L's assertion that the transmission line proposed in Vectren's July 15, 2010 application in this case "will adversely affect HMP&L's existing substation property, transmission lines, and ability to provide reliable electric service for its existing and future customer base."

b. Provide any data, reports, analyses, or any other information in HMP&L's possession which support HMP&L's assertions regarding adverse impacts on

its existing substation property, its transmission lines, or its current or future system reliability from Vectren's proposed transmission line.

4. Refer to page 3 of HMP&L's August 16, 2010 Motion for Intervention, in which HMP&L states that Vectren's transmission line "as proposed will significantly degrade scenic assets of the Commonwealth and that its construction as proposed will be in violation of applicable law."

a. Explain in detail HMP&L's assertion that the proposed route for the transmission line proposed in Vectren's July 15, 2010 application in this case "will significantly degrade scenic assets of the Commonwealth."

b. Provide any data, reports, analyses, or any other information in HMP&L's possession which support HMP&L's assertions regarding adverse impacts on the scenic assets of the Commonwealth from Vectren's proposed transmission line.

c. Explain in detail HMP&L's assertion that the proposed route for the transmission line proposed in Vectren's July 15, 2010 application in this case "will be in violation of applicable law."

d. Provide any data, reports, analyses, or any other information in HMP&L's possession which support HMP&L's assertions regarding the legality of Vectren's proposed transmission line.

5. Refer to page 3 of HMP&L's August 16, 2010 Motion for Intervention, in which HMP&L states that the July 15, 2010 application filed by Vectren in this matter "is incomplete including, but not limited to, the failure to properly notify all affected property owners."

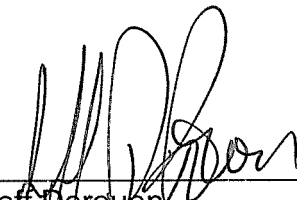
a. Explain in detail HMP&L's assertion that the July 15, 2010 application filed by Vectren in this matter is incomplete.

b. Provide a list of all elements of Vectren's July 15, 2010 application that HMP&L believes are deficient or otherwise not in compliance with any applicable statutory or regulatory requirement.

c. Provide a list of all property owners HMP&L believes were not notified by Vectren regarding its July 15, 2010 application in this matter.

6. Explain in detail whether HMP&L has proposed any alternative route for the transmission line to Vectren.

7. Provide, in both electronic (.pdf) format and paper format, a copy of any maps in HMP&L's possession of any alternative transmission line routes that HMP&L has proposed to Vectren for its transmission line.



Jeff Derouen
Executive Director
Public Service Commission
P.O. Box 615
Frankfort, KY 40602

DATED: SEP - 1 2010

cc: Parties of Record

Case No. 2010-00223

Bob Amato
Energy and Environment Cabinet
500 Mero Street
Frankfort, KY 4061

Mary-James Young
Senior Regulatory Counsel
Vectren Corporation
One Vectren Square
Evansville, IN 47708

Sue Baker
Office of the County Judge/Executive
Courthouse - 20 N. Main
Henderson, KY 42420

Honorable Jason R Bentley
Attorney at Law
McBrayer, McGinnis, Leslie & Kirkland PLLC
305 Ann Street
Suite 308
Frankfort, KY 40601

Tommy Chandler
218 Benjamin Terrace
Providence, KY 42450

William S Doty
President
Southern Indiana Gas & Electric Co.
One Vectren Square
Evansville, IN 47708

Ken Robinson
Cabinet for Economic Development
Old Capitol Annex
300 West Broadway
Frankfort, KY 40601

Honorable George L Seay, Jr.
Attorney at Law
Wyatt, Tarrant & Combs, LLP
250 West Main Street
Suite 1600
Lexington, KY 40507-1746