

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 CITY OF HENDERSON

The city of Henderson ("Henderson"), 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, Henderson 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.

Henderson 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 Henderson fails or refuses to furnish all or part of the requested information, Henderson 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 Henderson's August 16, 2010 Motion for Intervention, in which Henderson states that "the proposed route for the Vectren line and its subsequent operation will directly and adversely affect property owned and maintained by the City."

a. Explain in detail Henderson's assertion that the proposed route for the transmission line proposed in Vectren's July 15, 2010 application in this case will adversely affect Henderson's property.

b. Provide any data, reports, analyses, or any other information in Henderson's possession which support Henderson's assertions that Vectren's proposed transmission line will adversely affect Henderson's property.

2. Refer to page 2 of Henderson's August 16, 2010 Motion for Intervention, in which Henderson states that Vectren's proposed transmission line will "adversely

affect the City and will have a significant adverse impact upon legal, scenic, historic, aesthetic and perhaps archeological assets and property of the City and Commonwealth.”

a. Explain in detail Henderson’s assertion that Vectren’s proposed transmission line will have a significant adverse impact upon:

- (1) The city of Henderson.
- (2) Legal assets and property of Henderson and the Commonwealth.
- (3) Scenic assets of Henderson and the Commonwealth.
- (4) Historic assets of Henderson and the Commonwealth.
- (5) Aesthetic assets of Henderson and the Commonwealth.
- (6) Archeological assets of Henderson and the Commonwealth.

b. Provide any data, reports, analyses, or any other information in Henderson’s possession which support Henderson’s assertion that Vectren’s proposed transmission line will adversely affect “legal, scenic, historic, aesthetic and perhaps archeological assets and property” of Henderson and the Commonwealth.


3. Refer to page 2 of Henderson’s August 16, 2010 Motion for Intervention, in which Henderson states that Vectren’s proposed transmission line “will be in violation of applicable law.”

a. Explain in detail Henderson’s assertion that Vectren’s proposed transmission line will violate applicable law.

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

4. Explain in detail whether Henderson has proposed any alternative route for the transmission line to Vectren.

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



Jeff Derouen
Executive Director
Public Service Commission
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DATED: SEP - 1 2010

cc: Parties of Record

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