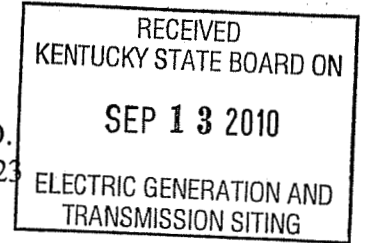


COMMONWEALTH OF KENTUCKY
BEFORE THE KENTUCKY STATE BOARD ON
ELECTRIC GENERATION AND TRANSMISSION SITING

In the Matter of:

APPLICATION OF SOUTHERN INDIANA)
GAS & ELECTRIC CO., D/B/A VECTREN)
ENERGY DELIVERY OF INDIANA, INC.)
FOR A CONSTRUCTION CERTIFICATE TO)
CONSTRUCT AN ELECTRIC TRANSMISSION)
LINE FROM ITS A.B. BROWN PLANT TO THE)
BIG RIVERS EHV STATION)

CASE NO.
2010-00223



**RESPONSE OF CITY OF HENDERSON
TO VECTREN'S FIRST DATA REQUEST**

Comes the City of Henderson (hereinafter referred to as "City"), by counsel, and for its Response to Vectren's First Data Request states as follows:

1. Please provide a copy of the City's proposed alternate river landing, which was provided to Vectren by a representative of the City on August 3, 2010.

Person Responsible: Russell Sights

Response: See attachment Exhibit "A". A copy of Vectren's proposed modification to the City of Henderson's plan was not provided due to National Security concerns raised by Vectren's attorney. The only difference between the two plans is Vectren's plan did not show the line going over the fire station but just to the south of it.

2. Please explain how, in the City's proposed alternate river landing proposal, the three proposed crossings of Canoe Creek is a better design of the Brown-Reid 345 kV line than the single crossing established by the Vectren Route study.

Person Responsible: Russell Sights

Response: The intent of the proposed alternate route is just a proposal. The Vectren proposed route crosses Canoe Creek two (2) times; thus, an additional crossing should not create any additional concern. According to Vectren officials, the alternate route proposed by the City of Henderson did not pose any environmental concerns.

3. Specifically, please explain how, in the City's proposed alternate river landing proposal, three crossings of Canoe Creek is preferable to a single such crossing from any environmental impacts perspective.

Person Responsible: Russell Sights

Response: See answer to question 2 above.

4. Please explain how the City's proposed alternate river landing's impacts on residential properties (including proximities to residential properties) is a better design than the design established by the Vectren route study, which maintains a separation from residential properties as required by its route study methodology.

Person Responsible: Russell Sights

Response: The proposed alternative route crosses agricultural land between the Ohio River and Canoe Creek. It passes over a vacant industrial property to the north of U.S. 60 and Canoe Creek. To the south of U.S. 60, it passes over an industrial tract of

ground. As it passes over Canoe Creek a second time, the line passes over a vacant industrial tract of land. At U.S. 41 A, the proposed route passes over the top of the City of Henderson's Fire Station 4, crosses Canoe Creek a third time before tying back into Vectren's original proposed route. The City of Henderson's proposed route has no more impact on residential property than Vectren's proposed route. Vectren's proposed easement route crosses within a historic African American cemetery (Mt. Zion) along U.S. 60. The City's proposal eliminates this concern altogether.

Attached is a copy of Vectren's residential land use map (Exhibit "B"). The City of Henderson's proposed route runs parallel to three residential properties along U.S. 41A; however, the proposed location is not closer than Vectren's proposed line that intersects the residential home on U.S. 41A between Canoe Creek and Henderson Municipal Power & Light's Sub-Station #4; nor the close proximity to the structure at U.S. 60 (McConnell residence).

5. Please explain how, in the City's proposed alternate river crossing and river landing proposal, closer proximity to both residential properties and a city-owned facility (a fire station) is preferable to the design established by the Vectren Route study.

Person Responsible: Russell Sights

Response: Reference to this question has been answered in both questions #4 and #6. The proposed route by the City was intended to eliminate the conflict with the City of Henderson's Water Utility property on Drury Lane and the significant impact on the intended use of this property. Second, this proposed route by the City also avoids the historic African American cemetery located on U.S. 60.

6. Please provide any plans or other documentation (including documentation of discussions) involving relocation or demolition or closure of the fire station which would be impacted by the City's proposed alternate river landing proposal by city officials, elected or appointed.

Person Responsible: Russell Sights

Response: Attached for review is a copy of the Fire Department's facility study (Exhibit "C"). The study recommends that Station 4 be relocated to a different location within the City.


7. Please list the names and qualifications of any experts or consultants engaged, retained, hired or otherwise involved in this matter and a synopsis of each expert or consultant's expected testimony and any reports, studies, or other documentation which he or she will cite or upon which he or she will rely.

Person Responsible: Russell Sights

Response: The City of Henderson does not have any experts listed at this time but if we choose to add any, we will notify you of such.

CERTIFICATE

I certify that the responses set out above are true and accurate to the best of my knowledge, information and belief, formed after reasonable inquiry.



Russell Sights
City Manager, City of Henderson

RESPECTFULLY SUBMITTED,

By: 

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Counsel for City of Henderson

CERTIFICATE OF SERVICE

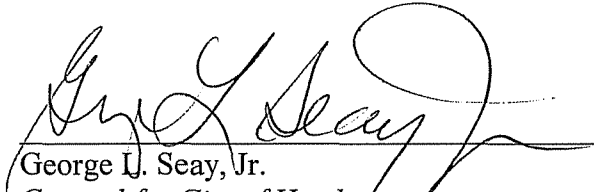
This is to certify that the original and ten true and correct copies of the foregoing has been served upon the following, by hand delivery, at the filing office of the Kentucky Public Service Commission, on this the 13th day of September, 2010:

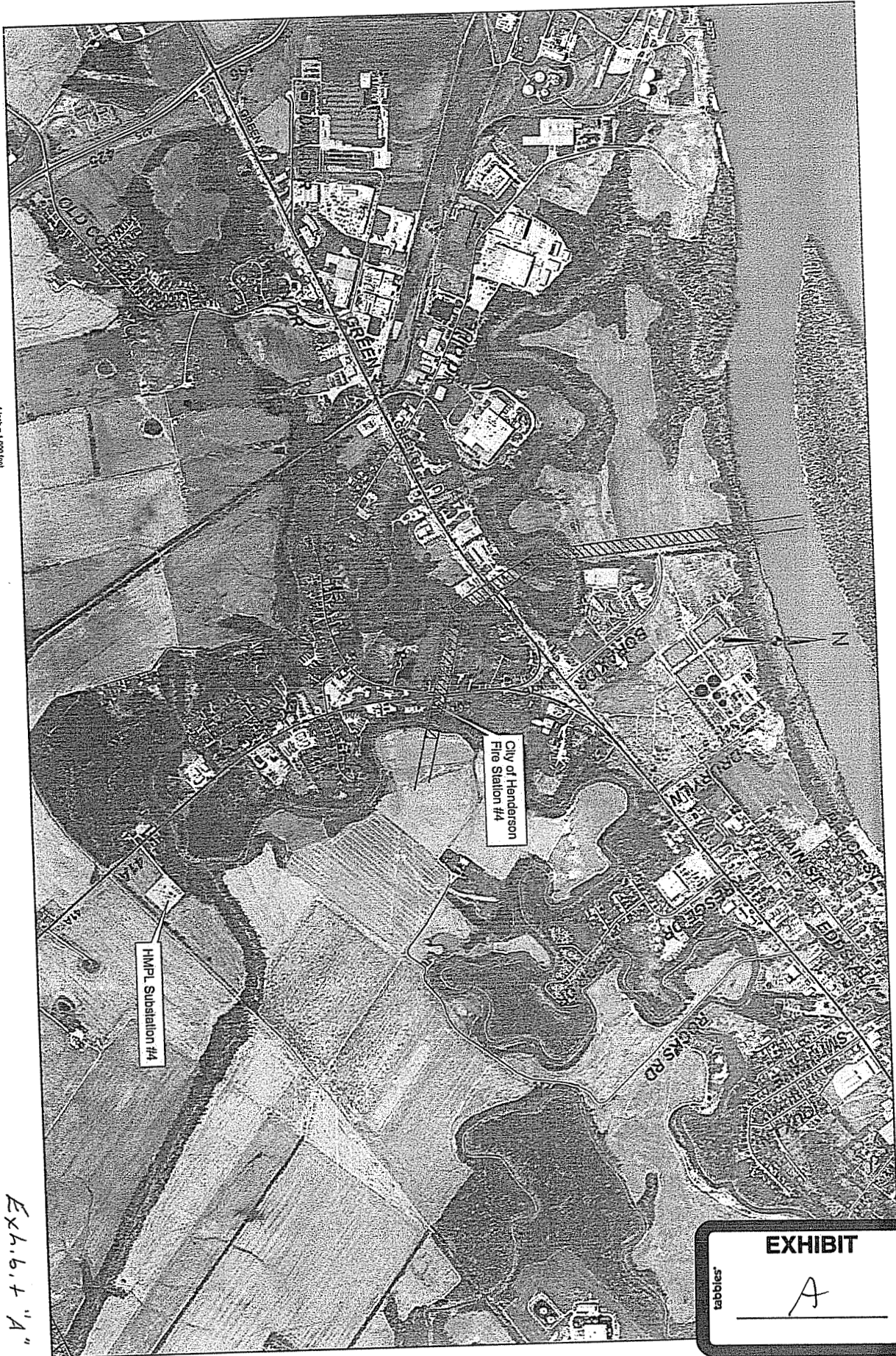
Hon. Richard W. Bertelson, III
Counsel
Public Service Commission
211 Sower Blvd
P.O. Box 615
Frankfort, KY 40602-0615

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

and via U.S. Mail, postage prepaid to:

Jason R. Bentley, Esq
McBRAYER, McGINNIS, LESLIE & KIRKLAND, PLLC
201 East Main Street, Suite 1000
Lexington, KY 40507


George U. Seay, Jr.
Counsel for City of Henderson



1 inch = 1,000 feet

City of Henderson
Fire Station #4

HMP Substation #4

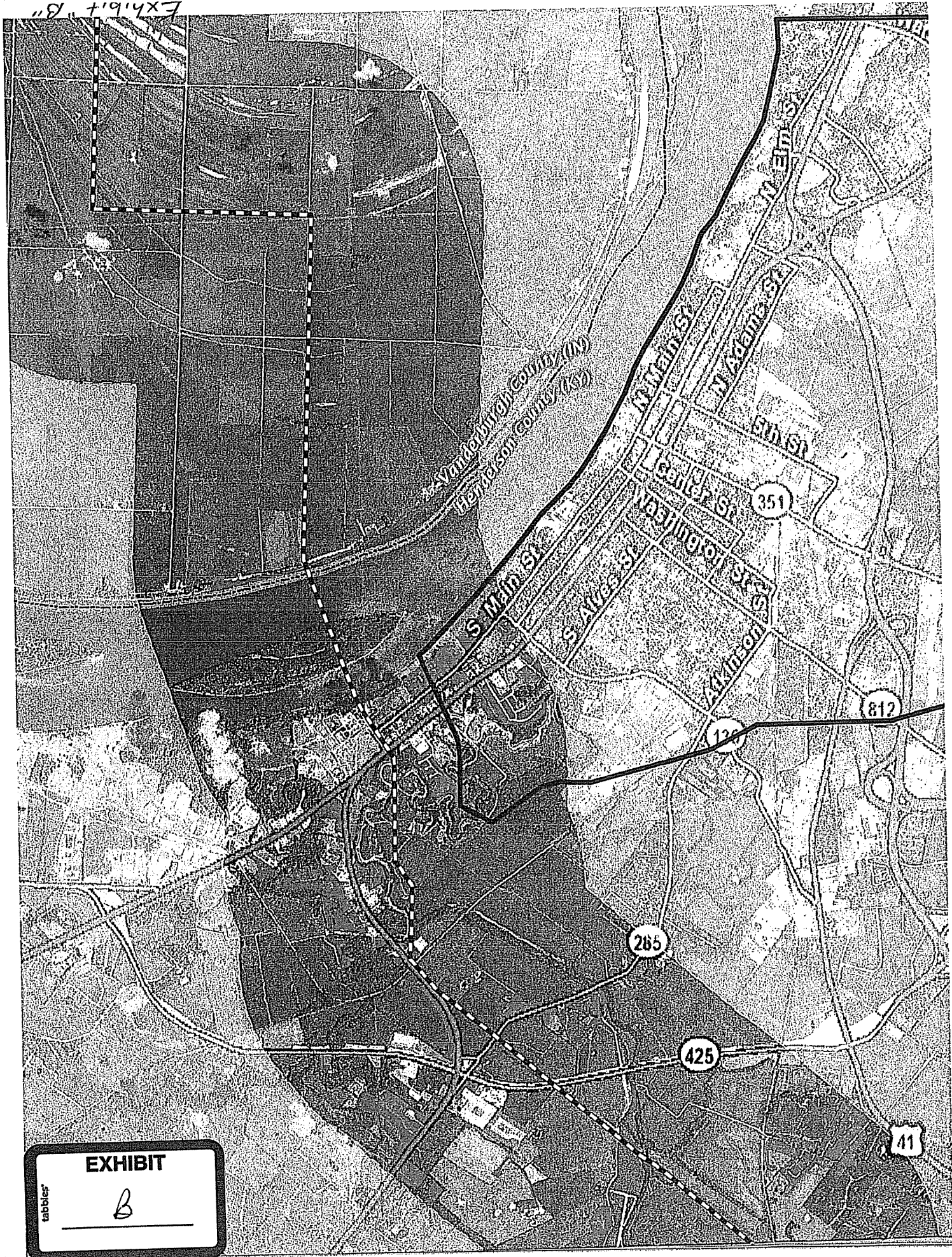
EXHIBIT

A

tabbles

Exhibit "A"

Exhibit B



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EXHIBIT

 B

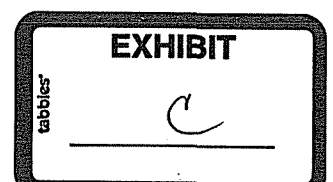
EXECUTIVE SUMMARY

The City of Henderson encompasses approximately 17 square miles with a population of 27,354 residents. Fire protection for the City is provided utilizing four fire stations with fourteen on-duty personnel. The purpose of this project was to develop a strategic plan for the Henderson Fire Department, as there is no long-term plan for the delivery of fire protection services within the City. The genesis of the study were the Fiscal 2004 work plan goals of undertaking a fire station siting study to be followed with the acquisition of property for the relocation of a fire station this year.

The process of developing a plan entailed developing four research questions to aid in the development of the plan:

- ❖ *What is the criterion to consider in determining the level of service provided to the community?*
- ❖ *What is the current level of service being provided?*
- ❖ *What level of service should be provided?*
- ❖ *What changes are needed to improve or increase the level of service provided to the City of Henderson?*

Through the research we noted three organizations had developed criterion and benchmarks to measure the effectiveness and efficiency of fire service organizations. The Insurance Services



Office (ISO), The Commission on Fire Accreditation International (CFAI), and the National Fire Protection Association (NFPA). Each of these organizations provided guidance in the development of a strategic plan.

The current level of service is determined through the use of three benchmarks. Two of these benchmarks are related to the travel time element. The first benchmark is for the first arriving apparatus. The first arriving apparatus in Henderson is on scene in four minutes or less travel time 83% of the time. The benchmark is 90%. The second benchmark is the arrival of the full first alarm assignment. Our first alarm assignment is arriving on scene in eight minutes or less travel time 89% of the time. Again the benchmark is 90% of the time. The third benchmark is for fire containment, which is a measurement of the efficient and effective use of resources.

With a benchmark of 90% for the containment of structure fires to the room of origin, the Henderson Fire Department is attaining this objective 79% of the time.

Benchmark	Actual
First arriving company arriving in 4 minutes or less 90% of the time	83%
Full first alarm assignment arriving in 8 minutes or less 90% of the time	89%
Containment of fire to the room of origin 90% of the time	79%

As a result of this research, a strategic plan has been developed. The plan outlines the changes necessary to affect improvements to the system. Further, the plan outlines various phases to the improvements in order to manage the change in fire protection, including proposed station locations based on time contours developed utilizing the FLAME software. The recommendations are as follows:

1. The existing Station Three (Green and Richardson) should be moved to the US 60 East and Green River Road/Watson Lane area.
2. The existing Station One (Washington Street) should be moved to the Second Street and Alvasia Street area.
3. The existing Station Four (Highway 41A) should be moved to the Green Street and Fair Street area.
4. The existing Station Two (Highway 41S) should be closed and that company moved to the new Station Three.
5. The minimum staffing of fourteen per shift should be increased to seventeen.

The first phase of these improvements calls for the replacement of Fire Station 3, which can be accomplished independently of the other recommendations and will have a positive impact on fire protection in the community in and of itself. Fiscal 2004 work plan objectives, coupled with budgeted funds, are available to proceed in this regard. The remaining improvements can be phased into place in the wisdom of the Board of Commissioners in the future.

Ultimately, the level of fire protection service provided to the community is a matter of great importance that is entrusted to the Board of Commission who must balance finite financial resources among a myriad of organizational and community needs. As a part of the balancing equation, the Board must ascertain the level of risk deemed prudent for the community as it relates to fire protection and marshal its resources consistent with that approach.

INTRODUCTION

As the City enters a new millennium and faces numerous risks both man-made and natural, we note there is no long term plan for the delivery of fire protection services within the City of Henderson. The purpose of this research is to develop a deployment model and long term plan for fire protection in the City of Henderson.

For the purposes of establishing a deployment model, the following research questions were developed.

1. What is the criterion to consider in determining the level of service provided to the community?
2. What is the current level of service being provided to the City of Henderson?
3. What level of service should be provided to the City of Henderson?
4. What changes are needed to improve or increase the level of service provided to the City of Henderson?