## COMMONWEALTH OF KENTUCKY

## BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF DUKE ENERGY KENTUCKY, INC. FOR A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY TO CONSTRUCT A 138 KV TRANSMISSION LINE AND ASSOCIATED FACILITIES IN BOONE COUNTY, KENTUCKY (OAKBROOK TO AERO TRANSMISSION LINE PROJECT)

CASE NO. 2019-00251

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## COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION TO DUKE ENERGY KENTUCKY, INC.

Duke Energy Kentucky, Inc. (Duke Kentucky), pursuant to 807 KAR 5:001, is to file with the Commission the original and an electronic version of its responses to the following information. The information requested herein is due on October 31, 2019. Responses to requests for information in paper medium shall be appropriately bound, tabbed, and indexed. Electronic documents shall be in portable document format (PDF), shall be searchable and shall be appropriately bookmarked.

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 the 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. Duke Kentucky shall make timely amendment to any prior response if Duke Kentucky 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 Duke Kentucky fails or refuses to furnish all or part of the requested information, Duke Kentucky shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall 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 filing a paper containing personal information, Duke Kentucky shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to Duke Kentucky's response to Commission Staff's First Request for Information (Staff's First Request), Item 4.

a. Confirm the proposed expenditures for the project are included in the capital expenditure budget in Case No. 2019-00271, pursuant to 807 KAR 5:001, Section 16(7)(b).<sup>1</sup>

b. If item a. above is confirmed, explain the difference in cost in the instant case and the base rate case.

<sup>&</sup>lt;sup>1</sup> Case No. 2019-00271, Electronic Application of Duke Energy Kentucky, Inc. for 1) An Adjustment of the Electric Rates; 2) Approval of New Tariffs; 3) Approval of Accounting Practices to Establish Regulatory Assets and Liabilities; and 4) All Other Required Approvals and Relief (Application filed Sept. 3, 2019).

2. Refer to Duke Kentucky's response to Staff's First Request, Item 12. Provide a copy of the finalized engineering design work plan along with any updates on projected capital cost for the proposed transmission project.

3. Refer to Duke Kentucky's response to Staff's First Request, Item 14, which provides that Amazon's projected load at full build-out will be 90 MW. Refer also to the Direct Testimony of Yanthi W. Boutwell, page 8, lines 6–7, which provides that the full build-out of the Amazon facility will require 60 MW. Explain why the increase in the projected load of the Amazon facility at full build-out has increased by 50 percent.

4. Refer to Duke Kentucky's response to Staff's First Request, Item 15. Identify the property owner(s) that Duke Kentucky will need to obtain permission for the outstanding easements needed for the proposed transmission project.

5. Refer to Duke Kentucky's response to Staff's First Request, Item 20.

a. Provide a copy of the Kevin Costello letter referenced in this response.

b. Provide copies of the letters that were sent to property owners within
500 feet of the proposed transmission route.

c. Provide the nature of the information requests that was sought by the two property referenced in this response and state whether Duke Kentucky adequately responded to those requests. Provide a copy of any written responses that Duke Kentucky provided addressing the property owners' additional information requests.

6. Refer to Duke Kentucky's response to Staff's First Request, Item 21. Identify the location on Route B where the mixed-use development is located.

Case No. 2019-00251

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CH Gwen R. Pinson

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

DATED OCT 1 8 2019

cc: Parties of Record

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