

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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| APPLICATION OF BIG RIVERS ELECTRIC |) | |
| CORPORATION FOR A CERTIFICATE OF |) | |
| PUBLIC CONVENIENCE AND NECESSITY TO |) | CASE NO. |
| CONSTRUCT A 161 KV TRANSMISSION LINE, |) | 2019-00270 |
| AND A 345 KV TRANSMISSION LINE IN MEADE |) | |
| COUNTY, KENTUCKY |) | |

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO BIG RIVERS ELECTRIC CORPORATION

Big Rivers Electric Corporation (BREC), pursuant to 807 KAR 5:001, is to file with the Commission the original and six copies of the following information, with copies to all parties of record. The information requested herein is due on November 14, 2019. Responses to requests for information in paper medium 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 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.

BREC shall make timely amendment to any prior response if BREC 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 BREC fails or refuses to furnish all or part of the requested information, BREC 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, BREC 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 the application, paragraph 2, regarding Projects A and B.
 - a. Explain whether the new 161-kV line for Project A and the 345-kV transmission line for Project B will require a widening of the existing 69-kV Right-Of-Way (ROW).
 - b. If the existing ROW does require widening, explain whether there are any environmental impacts that must be mitigated and, if so, what steps BREC has taken.
 - c. Explain the steps BREC will take to take down the existing 69-kV lines and poles and construct the new proposed 69/161-kV line and the 69/345-kV line.
 - d. Provide a description of the existing 69-kV transmission structures.
2. Refer to the application, paragraph 2, regarding Project D.

a. There is not a 345-kV line in the immediate area. Explain whether the substation will step up the voltage from 161 kV to 345 kV.

b. Explain whether the land and ROW have been acquired for construction and, if not, BREC's progress to date.

c. Explain whether there are any environmental impacts that must be mitigated and, if so, what steps BREC has taken.

3. Refer to the application, paragraph 3.

a. Provide the expected load and load factor for the new Nucor steel plate manufacturing mill (Nucor Facility).

b. Identify any other sources for new load in the Meade County area that BREC has become aware of since the filing of the application. Consider this an ongoing request throughout this proceeding.

c. Explain how the proposed transmission construction will also enhance reliability to the retail customers of BREC's distribution cooperative members.

4. Refer to the application, paragraph 15.

a. Provide a breakdown of the total capital cost of the five proposed projects.

b. Provide a breakdown of the annual operation and maintenance expense by account number.

5. Refer to the application, paragraph 16. Provide a schedule showing the permits that will be required for the construction of the proposed transmission facilities, the timeline for each permit, and the current status of each permit request.

6. Refer to the application, paragraphs 18 and 19.

a. State whether BREC has received any responses to the notice that mailed to affected property or from the notice that was published in the *Brandenburg-Meade County Messenger*. If so, provide a summary of those response(s) or, if the response(s) were in written format, provide a copy of the written response(s). Consider this an ongoing request throughout this proceeding.

b. Explain whether BREC has held any local town hall meetings to explain the projects and answer questions. If so, provide a copy of any handout materials and the attendance sign-in sheet from the meeting(s).

7. Refer to the application, paragraph 24. Explain why the need to request authority to move the substations from the locations shown on the maps filed with the application.

8. Refer to the application, Exhibit A, the direct testimony of Michael W. Chambliss (Chambliss Testimony), pages 3–4, regarding the seven transmission system improvement projects.

a. Confirm that the primary driver for these seven transmission projects is the new Nucor steel plate manufacturing mill.

b. State whether the proposed transmission projects would be needed absent the new Nucor steel mill.

c. State whether Project F (the proposed Greenfield 345-kV Redmon Road Switching Station) and Project G (the 2.5-mile, 345-kV transmission line from the Redmond Road Switching Station to the Otter Creek Substation) is part and parcel of Projects A through E to provide electric service to the new Nucor steel mill.

9. Refer to the Chambliss Testimony, page 5, lines 1–5. Provide the anticipated increase in transmission revenues that will result from the proposed projects.

10. Refer to the Chambliss Testimony, page 5, lines 10–13. Provide the desired Nucor construction timeline.

11. Refer to the Chambliss Testimony, page 6, lines 8–10.

a. Explain how the \$3.5 million cap was determined to be a reasonable amount for Nucor to reimburse BREC in the event the electric service agreements are not approved and consummated.

b. Explain why there is not a similar provision to address the scenario in which Nucor would not be able to complete the construction of its new mill.

12. Refer to the Chambliss Testimony, pages 6, line 19 through page 7, line 2. Explain when BREC will make a final determination regarding the financing of the proposed transmission projects.

13. Refer to the Chambliss Testimony, page 7, lines 5–7. Explain whether any of the construction costs associated with the proposed transmission projects will be ultimately borne by the retail customers of BREC's distribution cooperative members.

14. Refer to the application, Exhibit D, page 3 of 3.

a. Provide a more detailed, higher resolution map showing nearby structures and other land features such as cemeteries, wetlands, etc., that may be affected by the higher transmission line structures or expanded ROW.

b. Explain whether the illustrated route of the 345-kV line and substation that corresponds to Projects F and G on page 2 of the application, is tentative, how and why the exact route was selected, and whether any ROW has been acquired.

15. Explain whether MISO will require any transmission system upgrades in order to support the additional load from the new steel plant and any additional development that may occur in the future. If so, provide a brief description.



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

DATED NOV 04 2019

cc: Parties of Record

*Big Rivers Electric Corporation
201 Third Street
P. O. Box 24
Henderson, KY 42420

*Tyson Kamuf
Corporate Attorney
Big Rivers Electric Corporation
201 Third Street
P. O. Box 24
Henderson, KY 42420