

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF KENTUCKY	)	
UTILITIES COMPANY FOR A CERTIFICATE OF	)	CASE NO.
PUBLIC CONVENIENCE AND NECESSITY FOR	)	2022-00066
THE CONSTRUCTION OF TRANSMISSION	)	
FACILITIES IN HARDIN COUNTY, KENTUCKY	)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION  
TO WADE FAMILY FARM MANAGEMENT, LLC

Wade Family Farm Management, LLC (Wade Farm), pursuant to 807 KAR 5:001, is to file with the Commission an electronic version of the following information. The information requested is due on May 23, 2022. The Commission directs Wade Farm to the Commission's July 22, 2021 Order in Case No. 2020-00085<sup>1</sup> regarding filings with the Commission. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the question to which the response is made and 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

---

<sup>1</sup> Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC July 22, 2021), Order (in which the Commission ordered that for case filings made on and after March 16, 2020, filers are NOT required to file the original physical copies of the filings required by 807 KAR 5:001, Section 8).

response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Wade Farm shall make a timely amendment to any prior response if Wade Farm obtains the information that indicates the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which Wade Farm fails or refuses to furnish all or part of the requested information, Wade Farm 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 applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, Wade Farm 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 Direct Testimony of Marty Marchaterre, page 11, lines 14–20 and page 13, lines 1 and 15–16.

a. Explain whether it is Wade Farm's position that only a single line be built in order to service the Megasite and that the eastern transmission line is the line that should be constructed.

b. Explain whether Wade Farm is aware of standard electric utilities' practice of furnishing power to large industrial sites and whether these sites are usually served by more than one transmission line for reliability purposes.

2. Refer to the Direct Testimony of Marty Marchaterre, page 12, lines 1–8 and the Application, Exhibit 2, page 46. Exhibit 2 on page 46 is a map showing the Western Alternate Routes. On the map, the West A Route is longer and, hence more costly, than the West D Route.

a. Explain whether Wade Farm is proposing that rather than take a route that primarily stays away from residential areas, Kentucky Utilities should take the West D Route through a residential neighborhood, where no transmission line currently exists.

b. Explain whether Wade Farm has contacted the residential neighborhood homeowners concerning its desire to not have the transmission line encroach on its farm, but to have it run through their neighborhood.

3. Provide a map of the current Gaither Station line and proposed line route that Wade Farm mentions in the Direct Testimony of Thomas Wade, pages 8–9.

4. List and describe all conservation easements to which the Wade Farm property is subject.



Linda C. Bridwell, PE  
Executive Director  
Public Service Commission  
P.O. Box 615  
Frankfort, KY 40602

DATED     MAY 16 2022    

cc: Parties of Record

Case No. 2022-00066

\*L Allyson Honaker  
Goss Samford, PLLC  
2365 Harrodsburg Road, Suite B325  
Lexington, KENTUCKY 40504

\*T. Morgan Ward, Jr.  
Stites & Harbison, PLLC  
1800 Providian Center  
400 West Market Street  
Louisville, KENTUCKY 40202

\*Honorable Allyson K Sturgeon  
Managing Senior Counsel - Regulatory &  
LG&E and KU Energy LLC  
220 West Main Street  
Louisville, KENTUCKY 40202

\*John and Loretta Hagan  
1470 High Point Blvd.  
Orlando, FLORIDA 32825

\*David S Samford  
Goss Samford, PLLC  
2365 Harrodsburg Road, Suite B325  
Lexington, KENTUCKY 40504

\*Larry & Kay Hagan  
1055 W. Glendale-Hodgenville Road  
Glendale, KENTUCKY 42740

\*Grover K. Berry  
339 Mockingbird Valley Road  
Louisville, KENTUCKY 40207

\*Robert Conroy  
Vice President, State Regulation and Rates  
LG&E and KU Energy LLC  
220 West Main Street  
Louisville, KENTUCKY 40202

\*Honorable Kendrick R Riggs  
Attorney at Law  
Stoll Keenon Ogden, PLLC  
2000 PNC Plaza  
500 W Jefferson Street  
Louisville, KENTUCKY 40202-2828

\*Kentucky Utilities Company  
220 W. Main Street  
P. O. Box 32010  
Louisville, KY 40232-2010

\*Katie M Glass  
Stites & Harbison  
421 West Main Street  
P. O. Box 634  
Frankfort, KENTUCKY 40602-0634

\*Stephen L. Dobson  
125 Stirling Lane  
Versailles, KENTUCKY 40383

\*Michael Hornung  
Manager, Pricing/Tariffs  
Louisville Gas and Electric Company  
220 W. Main Street  
P. O. Box 32010  
Louisville, KY 40202