

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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| 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 SECOND REQUEST FOR INFORMATION
TO KENTUCKY UTILITIES

Kentucky Utilities Company (KU), 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 April 21, 2022. The Commission directs KU to the Commission's July 22, 2021 Order in Case No. 2020-00085¹ 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

¹ 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.

KU shall make timely amendment to any prior response if KU obtains 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 KU fails or refuses to furnish all or part of the requested information, KU 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, KU 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, page 3.
 - a. Explain why two 345 kV lines emanating from the same 345 kV line, but at different points are necessary for serving the Glendale South Substation.
 - b. Provide the date when KU last had a 345 kV line outage, the outage cause and duration.
2. Refer to the Application, footnote 2, page 4.
 - a. Explain what "behind the meter" facilities will be the responsibility of Ford Motor Company and its partner, SK Innovation (collectively, Ford).

- b. Explain where Ford’s responsibility for facilities begins.
3. Refer to the Application, page 4 and the Direct Testimony of Beth McFarland (McFarland Testimony), page 3, lines 1–3. Explain whether KU has received any notice or indication from Ford or any other entity that the anticipated location of other customers supporting the Ford plant will occur inside the industrial park.
4. Refer to the Application, Exhibit 5, page 4 of 5, regarding the line that is within the Glendale Megasite marked as “Planned EKPC Line.” Also refer to the Application, Exhibit 2, pages 66–67, and 78. Explain whether the Planned 69 kV EKPC Line referenced in these Exhibits will be removed or, if it is not to be removed, whether it is a line that will be upgraded or a new line that will be constructed.
5. Refer to the Application, Exhibit 6, pages 1–4 of 5.
 - a. Explain why the proposed 345 kV line could not have interconnected the Davis County-Hardin County 345 kV line instead of the Brown North – Hardin County 345 kV line.
 - b. Also, refer to the McFarland Testimony, page 8, lines 20–21. Because the proposed 345 kV line appears to parallel a portion of the Bonnierville – Hardin County 69 kV line, explain why the 345 kV line could not have paralleled the Bonnierville – Hardin County line along the railroad track for most of the proposed route’s northern section rather than over new right-of-way (ROW).
6. Refer to the Application, Exhibit 6, page 5 of 5.
 - a. For the portion of the Glendale South – Glendale Industrial 138 kV line that parallels the proposed western 345 kV line, explain why both lines could not be located on the same structures before the 138 kV line turns south.

b. At the bottom of Exhibit 6 where both of the proposed 138 kV lines appear to run parallel, explain why the proposed lines could not be located on the same structures.

7. Refer to the McFarland Testimony, page 5, lines 19–23 and page 6, lines 1–2. Explain what is involved in a transmission service request and provide the results of any study conducted as a result of KU's request.

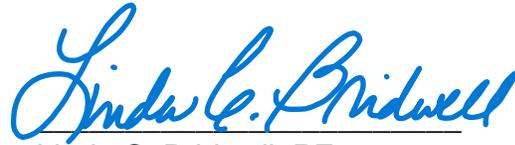
8. Refer to the McFarland Testimony, page 6, lines 3–9. Explain whether KU evaluated any alternatives to the proposed projects. If so, provide a cost benefit study for the proposed project, and explain whether the cost of removing any electrical facilities that do not belong to KU from the proposed site is included in the cost study. If alternatives were not evaluated, provide an explanation why alternatives were not evaluated.

9. Refer to the McFarland Testimony, page 6, lines 10–17. Explain whether Team Spatial was given the interconnection points of the proposed two 345 kV lines and the 138 kV lines and that it was tasked with determining only the optimal routes between the interconnection points.

10. Refer to the Application, Exhibits 5 and 6 and the Direct Testimony of Robert Conroy (Conroy Testimony), page 1, lines 19–22 and page 2, lines 1–8. Provide a map showing both the proposed 345 kV and 138 kV electric lines and the proposed natural gas line extension and termination point on the same map(s).

11. Refer to the Conroy Testimony, page 2, lines 5–6. Provide the property owners of the two parcels that will be crossed to build the proposed natural gas line extension and explain whether they have been notified, and if so, how they were notified.

12. Refer to Attachment 1 to KU's response to Staff's First Request for Information, page 36. Provide additional ownership information and documentation for Parcel 207-00-00-30.



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Public Service Commission
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DATED APR 13 2022

cc: Parties of Record

Case No. 2022-00066

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