

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 POST-HEARING REQUEST FOR INFORMATION
TO KENTUCKY UTILITIES COMPANY

Kentucky Utilities Company (KU), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due no later than June 10, 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. Provide a schematic of the substation, accompanying 138 kV lines and gas line on the Glendale Megasite property. Indicate where the meter(s) are and the demarcation point for financial responsibility of the lines and equipment that are Ford's responsibility, the responsibility of KU and estimated cost for each assigned item.

2. Refer to KU's response to Commission Staff's Third Request for Information, Item 3, page 35 of 36.

a. Provide the size of the gas main and whether it will be able to support a future gas fired generation facility.

- b. Provide the portion of the gas pipeline that will be Ford's expense.
- c. Confirm that all gas facilities built will be covered by a gas facilities' rider or agreement.

3. Refer to KU's response to Commission Staff's Second Request for Information (Staff's Second Request), Item 1a.

- a. Explain whether the cost of removing the existing 2.7-mile segment of the Brown North-Hardin County line between the two proposed tap points is included in the cost of constructing the proposed East and West 345 kV lines. Include in the response the cost of removing the line segment.

- b. Explain why the line segment is being removed once the East and West 345 kV taps are completed.

- c. Explain whether KU is relinquishing its existing right-of-way once the line segment is removed.

4. Refer to KU's response to Staff's Second Request, Item 5a.

- a. Provide further explanation of what a three terminal line is and how that differs from the existing Daviess County–Hardin County and Brown North-Hardin County line terminal. That existing tap has a short line segment to the substation just to the north and three terminal points at the tap, two (2) Brown North–Hardin County line segments on either side of the tap and the Daviess County–Hardin County line. Reconcile how this is not the same situation as KU is attempting to avoid on the Western Route as proposed with the parallel section.

b. Explain why the line segment of the proposed Western Route 345 kV line running parallel to the Daviess County–Hardin County 345 kV line does not represent wasteful duplication of service.

c. Provide a transmission study for the example discussed on part c above showing that thermal, voltage, or other issues result in either single or double faults that render tapping the West Route on the Daviess County–Hardin County line not good utility practice.

5. Provide the number of additional megawatts of load available, without sacrificing reliability, for the following:

- a. Daviess–Hardin County line;
- b. Brown North–Hardin County line;
- c. The proposed Western 345 kV route;
- d. The proposed Eastern 345 kV route;
- e. The two proposed substations; and
- f. The proposed project in total.

6. Reconcile the testimony regarding proposed Western Route D, specifically the following statements:

a. Western Route D would have required the purchase of two residences according to Ms. McFarland.

b. Team Spatial report lists in estimated expenses \$0 for cost of residences for the Western Route D.

7. For the proposed Western Route D, provide parcel numbers, distance from the centerline, and the reason requiring the utility to purchase the residences along the proposed Western Route D.

8. Provide a breakdown of all anticipated costs of constructing each of the alternative eastern proposed routes and each of the alternative western proposed routes for the 345 kV transmission lines.

9. Provide a detailed description, including documentation and criteria, for the expert judgment portion of the funnel model documented in the Team Spatial Report, including a list of any qualitative and/or quantitative characteristics, categories, or features taken into consideration along with the corresponding weight in the valuation resulting in the figure on page 61 of the Team Spatial Report.



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Public Service Commission
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DATED JUN 03 2022

cc: Parties of Record

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