

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF KENTUCKY)	
POWER COMPANY FOR A CERTIFICATE OF)	
PUBLIC CONVENIENCE AND NECESSITY TO)	CASE NO.
REBUILD THE WOOTON-STINNETT PORTION)	2022-00118
OF THE HAZARD-PINEVILLE 161 KV LINE IN)	
LESLIE COUNTY, KENTUCKY)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO KENTUCKY POWER COMPANY

Kentucky Power Company (Kentucky Power), 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 July 12, 2022. The Commission directs Kentucky Power 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.

Kentucky Power shall make timely amendment to any prior response if Kentucky Power 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 Kentucky Power fails or refuses to furnish all or part of the requested information, Kentucky Power 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, Kentucky Power 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, generally.
 - a. Explain whether an environmental impact assessment is required or has been completed for the proposed projects. If so, provide a copy of the assessment.
 - b. Provide copies of any public comments received regarding the proposed line and explain whether any public meetings have been held regarding the proposed line and route.

c. State whether the customers currently being served from the Wooton-Stinnett portion of the Hazard-Pineville 161 kilovolt (kV) Transmission Line can be served from another existing Kentucky Power transmission facility.

d. Explain how long the residence has been inside the right-of-way (ROW).

2. Refer to the Application, paragraphs 13–20 and the Direct Testimony of Brian K. West (West Testimony) at 13–14. Provide a cost benefit study demonstrating that the projects are cost effective.

3. Refer to the Application, paragraph 19. Explain how and why a residential structure was allowed to be built in the transmission ROW.

4. Refer to the Application, paragraph 19, Exhibit 13, Aerial Map 2, page 54, Aerial Maps 9-14, pages 61–66.

a. Aerial Map 2 does not appear to show any movement of the proposed line to accommodate a residential structure. Aerial Map 9 appears to show a movement of the proposed line away from a structure. Confirm that this is the correct map and show the movement indicated in paragraph 19. If not, indicate which is the correct map.

b. Aerial Maps 11-14 appear to show the proposed route deviating from the existing route. Explain why this deviation from the existing route is necessary and whether the new route segments represent green field construction.

c. Explain whether any easements along this section of the proposed route will be relinquished and whether any additional easements will be expanded or new easements acquired.

5. Refer to the Application, paragraph 20 and the Direct Testimony of Nicholas C. Koehler (Koehler Testimony) at 12, lines 22–23. Explain the meaning of “reinforce distribution lines between the Leslie and Stinnett substations” and the steps required to reinforce the lines.

6. Refer to the Application, paragraph 57.

a. Explain how the proposed project increases capacity of the 161 kV network.

b. Explain why the capacity of the 161 kV network needs to be increased.

7. Refer to the Application, paragraph 59 and Koehler Testimony at 10, lines 6–15.

a. Define “momentary outage” and “permanent outage.”

b. Refer also to the Application, page 4 that states that there are 55 structures along the 11-mile Wooton-Stinnett in question. Given the list of Open Conditions listed in the Koehler Testimony, explain how often Kentucky Power inspects its transmission circuits and what specifically is inspected during a transmission line inspection. Include in the response any specific Kentucky Power procedural guidelines for transmission line inspections.

c. Once a transmission line inspection has taken place, explain the extent of damage or Open Conditions that must be discovered in order to trigger a maintenance decision to repair or replace the damaged or broken facilities.

d. Given the extent of the damage to poles, crossarms and other facilities, explain how Kentucky Power inspectors were unaware of the damage. If

Kentucky Power was aware of the extent of the damage, explain why the open conditions were not remedied before this proposed project.

8. Refer to the Application, Rebuild Siting Study, page 6.
 - a. Explain when a Lattice Tower would be used over a Steel H-Tower.
 - b. Explain the locations where a Lattice Tower could be used in this case.
 - c. Provide a cost benefit analysis for a Lattice Tower and a Steel H-Tower.

9. Refer to Koehler Testimony at 10, lines 19–21. Of the three permanent outages that caused a total of 631 thousand minutes of interruption, explain whether the causes of these three outages would have caused an outage had the proposed project been completed.

10. Refer to Koehler Testimony at 12, lines 3–9.
 - a. Provide the expected useful life of the structures currently in place between the Wooten, Leslie, and Stinnett substations.
 - b. Provide the ages(s) of the structures.
 - c. Define “substantial structure failure.”
 - d. State whether Kentucky Power has assessed the structures between the Wooten, Leslie, and Stinnett substations for relative risk of substantial structure failure, if so, provide the assessment(s).

11. Refer to Koehler Testimony at 13, lines 16–17. Explain whether two 161 kV MOAB Ws are being replaced at the Leslie Substation.

12. Refer to Koehler Testimony at 13–14, generally. In the project description, there is no mention of the actual line being replaced. Explain whether the electrical transmission capability of the existing line has deteriorated and whether the new conductor will be more efficient or have a greater transmission capacity than the existing line.

13. Refer to Koehler Testimony at 14, lines 1–5. Explain the purpose of the optical ground wire (OPGW) and whether it currently exists along the proposed route.

14. Refer to the Koehler Testimony at 14, lines 8–20, which states that structure replacements are needed on a total of 19 structures (79 percent of the line section between the Wooton and the Leslie Substations, and a total of 22 structures (69 percent of the line section) between the Leslie and the Stinnett Substations.

a. State what standards are applied by Kentucky Power in determining that a structure needs to be replaced rather than repaired.

b. State the estimated costs of repairing the structures rather than replacing them (if possible), and how long that would extend their useful lives.

c. State the expected useful lives of the proposed new structures.

15. Refer to the Koehler Testimony at 15, lines 13–14, which states “Piecemeal replacement would also increase the overall cost of the project due to increased mobilization and construction costs.” State how much the overall cost would increase by making incremental repairs rather than going forward with the proposed project, which is estimated to cost approximately \$49 million.

16. Refer to the Direct Testimony of Emily S. Larson at 9, lines 16–21. Provide a list of the land owner requests and the materials provided in response to the requests.



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DATED JUN 30 2022

cc: Parties of Record

Case No. 2022-00118

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