

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.
CONSTRUCT 69 KV TRANSMISSION LINES	)	2022-00236
AND ASSOCIATED FACILITIES IN PIKE	)	
COUNTY, KENTUCKY	)	

COMMISSION STAFF'S SECOND 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 October 31, 2022. The Commission directs Kentucky Power 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

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<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.

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, Exhibit 10 and Exhibit 12, reconcile the statement made in paragraph 2 of the Affidavit in Exhibit 12 with Exhibit 10, specifically PSC filing ID parcel number 43.
2. Refer to the Application, Exhibit 10 and Exhibit 12, reconcile the address in Exhibit 12 with Exhibit 10 for PSC filing ID parcel number 43.
3. Identify PSC filing ID parcel number 42 on the maps in Application, Exhibit 10 and include updated owner information.

4. Refer to the Application, Exhibit 11, page 2 of 2. For Alternative Route D, explain why there is a portion of the existing Stone-Sprigg 46 kV line that is avoided.

5. Provide updated maps to scale for the project, including but not limited to identification using the Parcel ID, depiction of the right-of-way corridor specific for each property, notation where Kentucky Power anticipates the need for the wider corridor based on the reasons stated in the application, and the proposed transmission line route.

6. Provide an updated Application, Exhibit 12, based on the information provided in this data request.

7. Refer to Kentucky Power's response to Commission Staff's First Request for Information (Staff's First Request), Item 4. State the distance from the cemetery to the proposed transmission line.

8. Refer to Kentucky Power's response to Staff's First Request, Item 16 and the Application, Exhibit 10, starting at page 30 of 92.

a. Provide the estimated cost of constructing the proposed substation at Study Site 2, the site that was initially preferred.

b. Provide a detailed description and analysis of the landowner impact that resulted in Study Site 2 being eliminated from consideration.

9. Refer to Kentucky Power's response to Staff's First Request, Items 6 and 9. The responses are not clear. The existing right-of-way (ROW) of the currently energized 46 kV line already crosses the Pond Creek Road and runs through a residential and commercial area.

a. Explain why increasing the line voltage from 46 kV to 69 kV creates a problem when the 46 kV line already crosses the Pond Creek Road.

b. Explain why the commercial building and any other residential or commercial buildings are located such that they do not encroach on the right-of-way for the 46 kV line, but would necessitate removal for the 69 kV line.

c. Explain how these buildings were allowed to encroach on the existing 46 kV ROW.

d. Explain the approximate cost of acquiring the commercial building.

e. Identify on a map and explain where Kentucky Power would have to do additional construction on 1.6 miles of existing ROW.

10. Refer to Kentucky Power's Response to Staff's First Request, Item 8. It appears from this response that the outage constraint for the 1,547 distribution customers served out of the Belfry Substation is the primary reason for constructing a greenfield line from the Stone Substation to the new proposed Orinco Substation. Explain whether it would be feasible to construct and energize the northern segment of the proposed line from the New Camp Substation down to the Orinco Substation, once completed, before de-energizing the Stone-Sprigg 46 kV line. Include in the response whether this option would alleviate the outage scenario provided in Item 8.

11. Refer to the information provided to landowners, Belfry project handout. Provide an updated timeline based on the application date being Fall of 2022 and a statutory approval date of January 2023.

12. Explain whether Kentucky Power plans to file any additional Certificate of Public Convenience and Necessity applications for transmission line projects in the next 12 months.



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DATED OCT 18 2022

cc: Parties of Record

Case No. 2022-00236

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