

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF EAST)	
KENTUCKY POWER COOPERATIVE, INC. FOR)	
A (1) CERTIFICATE OF PUBLIC CONVENIENCE)	
AND NECESSITY FOR THE CONSTRUCTION OF)	CASE NO.
TRANSMISSION FACILITIES IN MADISON)	2022-00314
COUNTY, KENTUCKY; AND (2) DECLARATORY)	
ORDER CONFIRMING THAT A CERTIFICATE OF)	
PUBLIC CONVENIENCE AND NECESSITY IS)	
NOT REQUIRED FOR CERTAIN FACILITIES)	

COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
TO EAST KENTUCKY POWER COOPERATIVE, INC.

East Kentucky Power Cooperative, Inc. (EKPC), 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 December 15, 2022. The Commission directs EKPC 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

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).

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

EKPC shall make timely amendment to any prior response if EKPC 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 EKPC fails or refuses to furnish all or part of the requested information, EKPC shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied and scanned 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, EKPC shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Confirm that, but for the proposed 138 kV transmission line project, the EKPC Fawkes Expansion project would not be proposed

2. Confirm that, but for the proposed 138 kV transmission line project, the Madison County 69 kV Switching Station project would not be proposed.

3. Confirm that, but for the 138 kV transmission line project, the 138-69 kV step-down transformer project would not be proposed.

4. Confirm that, but for the 138 kV transmission line project, the New Industrial Substation project would not be proposed.

5. Refer to the Application, paragraph 18. Provide a detailed analysis and documented support for conclusion that the Fawkes Expansion, the Madison County Switching Station, placement of the step-down transformer and construction of the New Industrial Substation are extensions in the ordinary course of business, and therefore, the projects do not require a Certificate of Public Convenience and Necessity (CPCN).

6. Refer to the Application, Exhibit 14. The letter references an open house that occurred on September 22, 2022. Provide information regarding the public meeting. Include how the public meeting was advertised, the attendance, and whether any information about the additional projects in the Application were presented. Include any landowner concerns that were raised at the meeting. Also, include any materials that were distributed or a PDF of any presentation materials.

7. Provide a written copy of any landowner comments or concerns with any portion of the proposed projects in the Application. If not written, provide a summary of any verbal conversations with landowners.

8. Refer to the Application, Exhibit 16, Direct Testimony of Darin Adams (Adams Testimony), page 8, lines 16–21. Explain what actual industrial load growth or additions in the area have occurred since the 2021 transmission planning analysis. Include the actual increase in megawatts (MW) for the area.

9. Refer to the Adams Testimony, page 11, lines 13–20. Provide specific information regarding customers to be served by the New Industrial Substation. Provide

the status of negotiations or contracts that have been executed with new customers to be served by EKPC.

10. Explain what the North American Electric Reliability Council (NERC) right-of-way (ROW) requirement is for a 138 kV transmission line as well as a 69 kV transmission line.

11. Explain what the conductor blow-out requirements are and how they affect the ROW requirements for this project as proposed in its entirety.

12. Explain whether any landowner who may be affected by the movement of the proposed 138 kV or the proposed 69 kV transmission center line in any direction was notified of the possibility that the center line and the associated ROW could shift up to 100 feet in any direction from the selected location in the landowner notifications or any public outreach prior to this proceeding. If not, explain why not.

13. Provide the current available capacity of EKPC's transmission facilities in the Fawkes/New Industrial Substation area.

14. Provide the expected available capacity in the Fawkes/New Industrial Substation area once the proposed projects are completed.

15. Provide a cost benefit study demonstrating that the projects are cost effective. If no cost benefit study has been performed, explain why not.

16. Refer to the Adams Testimony, page 13. Provide any instances of outages on the KU Fawkes-West Berea 69 kV transmission line that has resulted in an outage at all seven substations.

17. Refer to the Adams Testimony, page 14. The statement was made, "This substation can be expanded in the future to add a 138-to-69kV transformer that would

allow EKPC to connect the existing 69 kV system in the area to EKPC's 138 kV system for needed support when the demand in the area exceeds the current capacity of the system." Provide any transmission planning studies that indicate when the demand in the area will exceed the current capacity.

18. Refer to the Adams Testimony, page 15. It was indicated that EKPC plans to move forward with the Madison County 69 kV Switching Station, "very soon." Provide a timeline for this project.

19. Refer to the Application, Exhibit 17, Direct Testimony of Laura LeMaster (LeMaster Testimony) page 7. Provide information about how many structure or cross-arm failures there have been on the current 69 kV transmission line in the last five years.

20. Refer the LeMaster Testimony, page 8. Provide the expected in service date for the 138 kV transmission line.

21. Refer to the LeMaster Testimony, page 11. Also refer to EKPC's response to Commission Staff's First Request for Information (Staff's First Request), Item 2. Explain when EKPC anticipates the industrial park will be developed to the point that the specific scope of the new substation will be known and will be required.

22. Refer to the LeMaster Testimony, page 19. Provide an update on the status of any permits needed for the project. If permits have still not been applied for, explain when the applications for those permits will be made.

23. Provide the known number of buildings or other structures currently encroaching on the existing 69 kV transmission line.

24. Explain whether a structure encroaching in a transmission line ROW is a violation of NERC reliability standards.

25. Explain whether EKPC plans to file any additional Certificate of Public Convenience and Necessity applications for future transmission projects in the next 12 months.



Linda C. Bridwell, PE
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Public Service Commission
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DATED DEC 01 2022

cc: Parties of Record

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