## COMMONWEALTH OF KENTUCKY

## BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF DUKE ENERGY ) KENTUCKY, INC. FOR A CERTIFICATE OF ) PUBLIC CONVENIENCE AND NECESSITY TO ) CONSTRUCT A 138-KV TRANSMISSION LINE ) AND ASSOCIATED FACILITIES IN BOONE ) COUNTY (HEBRON TO OAKBROOK ) TRANSMISSION LINE PROJECT) )

CASE NO. 2023-00239

## <u>COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION</u> <u>TO DUKE ENERGY KENTUCKY, INC.</u>

Duke Energy Kentucky, Inc. (Duke Kentucky), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due on October 27, 2023. The Commission directs Duke Kentucky 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

<sup>&</sup>lt;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).

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.

Duke Kentucky shall make timely amendment to any prior response if Duke Kentucky obtains information that indicates the response was incorrect or incomplete when made or, though correct or complete when made, is now incorrect or incomplete in any material respect.

For any request to which Duke Kentucky fails or refuses to furnish all or part of the requested information, Duke Kentucky 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, Duke Kentucky 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 Duke Kentucky's Application, pages 3-4, paragraph 7. For any portion of the proposed circuit that is to be "rebuilt," identify any existing infrastructure that will continue to be utilized under the proposed rebuild.

2. Refer to Duke Kentucky's Application, Exhibit 7 (Siting Study).

-2-

a. Explain how estimated cost was factored into analysis of the routes identified in the Siting Study and the selection of the proposed route.

b. Provide an estimated cost comparison of the routes analyzed.

3. Refer to Duke Kentucky's Application, Exhibit 7. Refer also to Case No. 2022-00364,<sup>2</sup> Exhibit 7. Confirm that Exhibit 7, (the Stantec Hebron to Oakbrook Reliability Project 138 kV Transmission Line Route Selection Study Report) filed in the present case has not been changed and is identical to the report filed as Exhibit 7 in Case No. 2022-00364. If there have been changes, discuss what changes were made to the present report.

4. Refer to the Direct Testimony of Yanthi W. Boutwell (Boutwell Direct Testimony), page 11, lines 12–16. If any alternative materials or design were considered, describe them and provide an estimated cost differential.

5. Refer to Boutwell Direct Testimony, page 15, lines 14–15.

a. Explain how wide the Filing corridor is as compared to the proposed transmission line right-of-way (ROW).

b. Explain potentially how far to the right or left the centerline could be moved if the proposed transmission line were to be moved within the Filing Corridor.

c. Explain potentially how far to the right or left the ROW could be moved if the proposed transmission line were to be moved within the Filing Corridor.

6. Refer to the Direct Testimony of John K. Hurd (Hurd Direct Testimony), page 5, lines 4–7. Once the proposed project is completed and the new #15264 line is

<sup>&</sup>lt;sup>2</sup> Case No. 2022-00364, *Electronic Application of Duke Energy Kentucky, Inc. for a Certificate of Public Convenience and Necessity to Construct a 138-kV Transmission Line and Associated Facilities in Boone County, Kentucky* (filed Apr 6, 2023), Exhibit 7.

converted to 138 kV, explain whether there will still be a 69 kV line that was part of the currently existing #15268 and #6763 lines. Include in the response whether the Oakbrook substation will only interconnect 138 kV transmission lines distribution voltages not withstanding

7. Refer to Hurd Direct Testimony, page 5, lines 6–10. Explain whether the portions of the new #15264 circuit that will be utilizing existing portions of line #15268 and #6763 (i.e. north of the Limaburg Substation) are built to 138 kV standards or will they have to be reconductored to accommodate the 138 kV voltage.

8. Refer to Duke Kentucky's Application, Exhibit 14 and Hurd Direct Testimony, page 5, lines 10–14. After the proposed project is completed, explain how the portion of the Duke Tap to Limaburg 69 kV line running from the point where the new 2.1 mile line section ties in with the existing Duke Tap to Limaburg 69 kV line North to the Duke Hebron to Constance 68 kV line.

9. Refer to Hurd Direct Testimony, page 14, lines 9–13. Refer also to June 16, 2023 Order in Case No. 2022-00364.<sup>3</sup> State whether the landowners who were not noticed in Case No. 2022-00364 and were given notice in the present case provided any comment or response to the notice letters and provide or describe any comments or responses.

<sup>&</sup>lt;sup>3</sup> Case No. 2022-00364, Electronic Application of Duke Energy Kentucky, Inc. for a Certificate of Public Convenience and Necessity to Construct a 138-kV Transmission Line and Associated Facilities in Boone County, Kentucky (Ky. PSC June 16, 2023), Order at 8.

Bridvell

Linda C. Bridwell, PE Executive Director Public Service Commission P.O. Box 615 Frankfort, KY 40602

DATED OCT 11 2023

cc: Parties of Record

\*Debbie Gates Duke Energy Kentucky, Inc. 139 East Fourth Street Cincinnati, OH 45201

\*Duke Energy Kentucky, Inc. 139 East Fourth Street Cincinnati, OH 45202

\*Larisa Vaysman Duke Energy Kentucky, Inc. 139 East Fourth Street Cincinnati, OH 45201

\*Minna Sunderman Duke Energy Kentucky, Inc. 139 East Fourth Street Cincinnati, OH 45201

\*Rocco O D'Ascenzo Duke Energy Kentucky, Inc. 139 East Fourth Street Cincinnati, OH 45201