

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)	CASE NO.
CONSTRUCT A 138-KV TRANSMISSION LINE)	2023-00239
AND ASSOCIATED FACILITIES IN BOONE)	
COUNTY (HEBRON TO OAKBROOK)	
TRANSMISSION LINE PROJECT))	

COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION
TO DUKE ENERGY KENTUCKY, INC.

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 December 22, 2023. The Commission directs Duke Kentucky 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

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).

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, Exhibit 7 (Route Selection Study Report), pages 16–18 and 43; and Duke Kentucky's Response to Commission Staff's First Request for Information, Item 2(a).

a. Verify that route “G” had the best quantitative criteria score and would be the most cost-effective route. If it is not, state which evaluated route had the best score and which would be the most cost-effective route.

b. State whether route “G” was eliminated as an option based on one or more qualitative reasons, including but not limited to the fact that it would run over the I-275 cloverleaf. If qualitative reasons were not why route “G” was eliminated, state why it was eliminated.

c. If route “G” was eliminated as an option based on the fact that it would run over the I-275 cloverleaf, explain why this fact is prohibitive, why the Route Selection Study Report does not indicate it is prohibitive, and why the model considers segments with span lengths that are not feasible.

d. If span lengths of a certain length are eliminated, either by the model or by post-modeling qualitative elimination, state the maximum span length and why that is the maximum length considered.

2. Refer to Duke Kentucky’s Application, Exhibit 12, pages 4, 16–17, and 21–34, consisting of two parcel/property owner lists and USPS return receipt “green cards.”

a. State the difference between the tables on pages 4 and 16–17.

b. Provide USPS return receipt “green cards” not included in Application Exhibit 12 for any listed property owner. If any green cards are not able to be provided, explain why.



Linda C. Bridwell, PE
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Public Service Commission
P.O. Box 615
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DATED DEC 05 2023

cc: Parties of Record

Case No. 2023-00239

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