

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF KENTUCKY)	
POWER COMPANY FOR A CERTIFICATE OF)	CASE NO.
PUBLIC CONVENIENCE AND NECESSITY TO)	2025-00346
CONSTRUCT 46KV TRANSMISSION LINE IN)	
FLOYD AND JOHNSON COUNTIES, KENTUCKY)	

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

Kentucky Power Company (Kentucky Power), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due on January 30, 2026. 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 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 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 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, 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. Explain how Kentucky Power prioritizes the order in which to complete projects approved through the PJM Regional Transmission Expansion Plan (RTEP) process.

2. Refer to the Direct Testimony of Jasmine L. Moore (Moore Direct Testimony), page 4, lines 11–12.

a. Provide a list of projects concerning Kentucky Power included in the PJM 2026 winter case and an anticipated completion date. If possible, separate the projects by N-1 and N-1-1 contingency.

b. Explain whether there are other additional Kentucky Power related PJM projects not included in the PJM 2026 winter case. If so, provide a list of these projects, and if possible, separate them out by N-1 and N-1-1 contingency and the anticipated completion dates.

c. For projects that are listed in the PJM 2026 winter case or any other PJM seasonal case, explain whether PJM requires that they be completed by a date certain. Include in the response whether there is a difference between Baseline and Supplemental projects.

d. Explain whether PJM initially designated the project as supplemental instead of the current baseline designation.

3. Refer to the Application, page 6, and the Moore Direct Testimony, page 5, lines 5–11. It appears that this project was reviewed with PJM stakeholders in November 2018 and then in two subsequent Sub-Regional Regional RTEP – Western meetings in April 2020 and October 2021.

a. Explain whether the result of the October 2021 RTEP meeting included an approved PJM solution to the transmission contingency violations.

b. In submitting a proposed route to the PJM RTEP process, explain the extent to which Kentucky Power has evaluated different route segments for encroachments, any environmental areas, roads, landslide prone areas, right-of-way (ROW) outage risk or any other constraints.

4. Refer to the Moore Direct Testimony, page 6, lines 14–20. Explain whether the project elements associated with a transmission project, but not included in the PJM project submission, can affect the total price of the various PJM solution alternatives such that an alternative not selected by PJM as least cost, could have a lower cost to ratepayers overall once these other project elements are included.

5. Refer to the Direct Testimony of Anastacia Santos (Santos Direct Testimony), page 16, lines 3-14. Explain what new cultural resources were discovered in the April 2025 environmental survey that had been missed during initial route selection process.

6. Refer to the Santos Direct Testimony, page 7, lines 3-9. Explain in further detail how the “uniformity of terrain type” renders the EPRI methodology infeasible and not probative for an accurate assessment of route selection options.

7. Refer to the Santos Direct Testimony, page 7, lines 19–23 and page 8, lines 1–13. Compare the various evaluation steps in the EPRI methodology to the “traditional and accepted multi-step methodology” employed by Kentucky Power.

8. Refer to the Santos Direct Testimony, page 7.

a. Explain whether Kentucky Power has ever employed the siting methodology used in this application in any other previous applications before the Commission.

b. If known, provide a list of any other utilities in Kentucky utilizing this siting methodology.

9. Refer to the Santos Direct Testimony, page 12, lines 17–18 and page 14, lines 4–5. Explain how Kentucky Power plans and addresses with encroachments on its transmission lines.

10. Refer to the Santos Direct Testimony, page 14, lines 11–19. Provide an updated Exhibit 15 with the various study segments labeled.

11. Refer to the Santos Direct Testimony, page 5, lines 22 and 23. Provide a map of the habitable structures in the current ROW. Identify the current transmission line route, the current ROW, and the structures.

12. Refer to the Santos Direct Testimony, page 5, lines 22 and 23. Provide a map of the non-habitable structures in the current ROW. Identify the current transmission line route, the current ROW and the structures.

13. Refer to the Santos Direct Testimony, page 5, lines 22 and 23. Confirm this statement to be true as of December 2025 and not an earlier date. If not confirmed, explain the response.

14. Refer to the Santos Direct Testimony, pages 5–6. Explain whether any of the structures identified in the testimony will be included in the requested ROW for this proposed project.

15. Refer to the Santos Direct Testimony, page 5. Explain what “AEP clearance requirements” is and how they were applied in this application.

16. Refer to the Santos Direct Testimony, page 11. Provide an updated Light Detection and Ranging Survey.

17. Refer to Santos Direct Testimony, page 12, lines 6–12. Provide a map with the proposed transmission line route and the parallel non-AEP transmission lines.

18. Refer to the Application, Exhibit 8, page 2, and Exhibit 4. Provide updated maps showing the other transmission lines and the respective line voltages interconnecting with the Prestonsburg, Kenwood, and Thelma substations.

19. Refer to the Direct Testimony of J. Scott Woody (Woody Direct Testimony), page 8, lines 10–23 and page 9, lines 1–21. Refer also to Application, Exhibit 4.

a. Explain whether Kentucky Power intends to clear the entirety of the ROW for each span for this project. If not, provide a description of the span and why no total clearing is planned.

b. If Kentucky Power does not anticipate clearing the ROW according to the various listed span ROW widths to account for conductor sway, explain the purpose of varying the ROW widths and how that comports with the North American Electric Reliability Council (NERC) standards for 69 kV transmission lines. Include in the response what the standards are for acceptable sway for 69 kV transmission lines.

20. Refer to the Application, Exhibit 4 and Woody Direct Testimony, page 3, lines 4–21.

a. Provide an updated map similar to Exhibit 4 with the structures relabeled to conform to the descriptions in Mr. Woody's testimony and depicting the ROWs that may be retained and those to be relinquished.

b. On the map to be provided in part a of Item 20 include the other transmission lines in the area that are supported by existing transmission line structures and or interconnect with the Thelma substation, Kenwood substation, the Prestonsburg substation.

21. Refer to the Application, Exhibit 7, Part 1, Rebuild Siting Study, page 7, Section 3.1 and the Woody Direct Testimony, page 3, lines 6–8. The Siting Study describes the project as including the rebuilding of a double circuit transmission line to the Kentucky Power’s existing Kenwood Substation. The Woody Direct Testimony describes the existing Prestonsburg-Thelma 46 kV line as a single circuit.

a. Confirm that the existing Prestonsburg-Thelma 46 kV line is a single circuit. Explain the response.

b. Explain how the Kenwood substation under the existing Prestonsburg-Thelma 46kV line configuration can be characterized as a double circuit.

22. Refer to the Application, page 7. Explain what is meant by ‘landowner input’.

23. Refer to the Application, page 7. Explain what Kentucky Power considers “terrain and structure placement challenges” so extraordinary as to eliminate a possible route option.

24. Refer to the Application, page 10. For the years 2020 through 2025, provide the following by month for each year:

- a. Number of Outages and Duration of each outage;
- b. Number of Voltage Violations in the area of the proposed project and location for each;
- c. Number of Voltage Drops in the area of the proposed project and location for each.

25. Refer to the Woody Direct Testimony, pages 3-4. Provide a map of the proposed transmission line project and ROW counter imposed with the current transmission lines and ROW. Identify the respective lines and ROW clearly.

26. Refer to Application, Exhibit 7, Siting Study, pages 8-9, paragraph 3.2, Santos Direct Testimony, pages 5-6, and Wolframm Direct Testimony, page 10, lines 17–21.

a. Explain in more detail why replacing the 46kV lines within the already existing ROW is not feasible or explain why doing so would be less cost effective than the proposed project.

b. Explain in more detail why Kentucky Power could not build new 46kV lines parallel to the already existing 46kV lines within the confines of the existing ROW for the entire length of the project.

c. Provide an estimated cost of the project if Kentucky Power were to carry out the proposed Project utilizing only its existing ROW.

27. Refer to Woody Direct Testimony, pages 3-6, and Wolfram Direct Testimony, page 10, lines 17-21.

a. Explain in detail the process of removing existing lines and removing stations for the Project including any other existing structures to be removed

b. Explain the costs associated with the removal and decommissioning of the existing lines, stations, and structures that Kentucky Power no longer plans to use, including the proposed use of helicopters, and whether all these associated costs are included in the estimated \$0.5 million for station removals and \$1.3 million for transmission line removals.

c. Explain what will happen to the existing ROW, or how Kentucky Power plans to utilize the existing ROW, that will no longer be used after completion of the proposed Project.

d. Explain any environmental remediation measures Kentucky Power plans to take with the existing ROW that will no longer be used.

e. Explain whether Kentucky Power plans to reutilize or reuse any existing lines or structures it plans to remove or decommission to offset costs associated with the project

f. Provide any cost-mitigating measures Kentucky Power will utilize in removing or decommissioning existing lines, stations, or structures from the existing ROW proposed to be disused.

28. Refer to Santos Direct Testimony, generally. Provide a copy of, or summary of, all public comments made at the public meetings, as part of the Outreach or received by Kentucky Power regarding this proposed project.

29. Refer to the Application, Exhibit 5.

a. Provide any additional updates to the information to Exhibit 5 beyond the route maps.

b. Explain why a delay of two years does not render the Siting Study information outdated and obsolete.

30. Refer to the Wolfram Direct Testimony, page 10.

a. Provide a breakdown of the specific cost components set forth in lines 17–21. Include, at a minimum, in that breakdown: labor, engineering estimates, transmission components by component, land acquisition, remediation.

b. For the five highest scoring alternatives, provide an identical breakdown for each alternative.

c. Explain whether these estimates include consideration of the costs associated with identified encroachments.

d. Identify the contingency amount included for each cost category.

31. Explain what communication Kentucky Power has had with the specific owners of the farmland identified by the United States Department of Agriculture (USDA).

32. Refer to Application, Exhibit 7, Page 17, paragraph 6.1. Explain any further communications made between Kentucky Power and USDA regarding the approximately three acres of pasture and unique farmland soil, and approximately five acres of farmland of statewide importance, as they relate to the Proposed Route ROW, and whether the concerns USDA raised have been addressed.

33. Refer to the Application, pages 13–14.

a. Provide an updated list of all Affected Landowners identified by the records of the property valuation administrator of Floyd and Johnson Counties, Kentucky.

b. Provide a map showing the Affected Landowners' individual parcels of land in relation to the proposed Project route. Include data indicating the owner of each individual parcel of the map.



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DATED **JAN 14 2026**

cc: Parties of Record

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