INTERROGATORY

DR-01-001 What is the purpose or function of the Hedding Road Switch?

RESPONSE

Hedding Road Switch provides transmission service to Consolidated Electric Co-op's Bloomfield delivery off the Larue – West Mount Vernon 138 kV circuit.

INTERROGATORY

DR-01-002 Is the existing switch a phase-over-phase style switch?

RESPONSE

Yes, the existing switch is a phase-over-phase switch.

INTERROGATORY

DR-01-003 Please show that it would be cost effective to replace and relocate the

switch, rather than repair or replace the burnt contacts of the existing

switch.

RESPONSE

The existing switch is under-rated for the functional capabilities of line dropping, which is its operation, causing faults to ground and outages for the Co-op for any needed isolation. Replacing the contacts will not correct the insufficient line dropping capabilities and will not allow the Company to operate the switch as intended or meet the Company's current standards. The replacement and relocation of the switch is the most cost-efficient measure that corrects the line dropping capabilities needed for the intended use of the switch.

INTERROGATORY

DR-01-004 Have the causes of the ground faults been identified and addressed?

RESPONSE

Due to lack of relaying at the switch, there is no fault data to pull in specific relation to the switch. The switch was originally installed in the 1980's, and since that time it would have been potentially subject to numerous different types of fault events experienced on the circuit that it is interconnected to. This would include things such as lightning strikes and low side faults from equipment connected to the 138 kV circuit.

INTERROGATORY

DR-01-005 Please provide any estimates of customer interruptions due to the faults

to ground.

RESPONSE

There are approximately 1,190 customers served directly from Consolidated Electric Co-op's Bloomfield delivery which have experienced over 2 million minutes of customer interruption over the last 10 years, including 1.6 million minutes of interruption in just the last 2 years.

INTERROGATORY

DR-01-006 Would the costs for the project(s) be classified as transmission plant?

RESPONSE

Yes, the costs for all components of the Project are classified as transmission plant.

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Summary: Response To Staff's First Set of Data Request electronically filed by Hector Garcia-Santana on behalf of Ohio Power Company.