

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

JUL 19 2013

PUBLIC SERVICE
COMMISSION

IN THE MATTER OF:

FRANK MCANINCH)

COMPLAINANT)

V.)

TAYLOR COUNTY RURAL ELECTRIC)
COOPERATIVE CORPORATION)

DEFENDANT)

CASE NO.
2013-00165

**TAYLOR COUNTY RURAL ELECTRIC COOPERATIVE CORPORATION'S
RESPONSES TO COMMISSION STAFF'S INITIAL REQUEST FOR INFORMATION**

Taylor County Rural Electric Cooperative Corporation (Taylor County) responds as follows to the Commission Staff's initial request for information issued herein on July 3, 2013, and pursuant to the Commission's Order entered on June 17, 2013.

1. a. State whether Taylor RECC currently provides electric services to 1341 Iven Godbey Road, Liberty, Kentucky 42539.

b. State the name of the person or entity to which service is rendered.

RESPONSE: WITNESS: John Patterson, Office Manager, Taylor RECC.

a. Yes, Defendant provides service to a residence occupied by Complainant and his family at that address. However, the sawmill operation which is the subject of

the within Complaint is not located on the Iven Godbey Road, but rather is located just off Kentucky Highway 1649, locally known as Poplar Hill Road.

b. The residential account is carried in the name of Frank McAninch.

2. Identify the tariff provision under which the subject building will be served.

RESPONSE: WITNESS: Mike Skaggs, Engineer, Taylor RECC. The sawmill operation for which service is sought is not housed in what Defendant would characterize as a "building". Rather, that operation is situated within an open-sided pavilion-type structure, and service thereto would be provided under GP Part 1. (45 kva bank).

3. Refer to Taylor RECC's tariff sheet number 16.

a. Identify the general procedures and/or criteria utilized by Taylor RECC to determine whether a service is temporary or permanent.

b. Identify the specific factors and criteria that Taylor RECC utilized to determine that the Complainant's building is a saw mill.

c. State the general factors that Taylor RECC applies in determining whether to assess the discretionary charge addressed under the subsection "Questionable Permanent Service".

d. State the specific factors and criteria that Taylor RECC utilized in deciding to assess, on the Complainant, the discretionary charge addressed under the subsection "Questionable Permanent Service".

RESPONSE: WITNESS: Barry Myers, Manager, Taylor RECC. a. With respect to those installations identified on tariff sheet number 16 as questionable permanent services (oil wells, sawmills, and billboards), those are uniformly treated as temporary facilities. Otherwise, a determination as to whether a service is temporary or permanent is case-specific.

b. WITNESS: Barry Myers, Manager, Taylor RECC; Mike Skaggs, Engineer, Taylor RECC. Complainant has consistently described this operation as a sawmill used to saw into lumber mature and damaged trees on Complainant's farm. Complainant suggests that this has not been "a large commercial sawmill" and that "we do not buy logs or saw logs for other people" (see Complaint), although the webpage for Rich Hill Farms (Exhibit C to Defendant's Answer) asserts that "we also sell lumber and do custom sawing". Visual inspection of the sawmill reveals that the sawing operation at the site at which that operation is conducted is not an integral part of some larger operation (cabinet, furniture, or pallet production).

c. WITNESS: Barry Myers, Manager, Taylor RECC; John Patterson, Office Manager, Taylor RECC. With respect to those services which are identified on tariff sheet number 16 as "Questionable Permanent", the charge for removal upon discontinuation of service is applied.

d. WITNESS: Barry Myers, Manager, Taylor RECC, John Patterson, Office Manager, Taylor RECC, Mike Skaggs, Engineer, Taylor RECC. The removal charge is included within the projected cost of providing service to sawmills. Defendant does not purport to make distinctions among sawmills.

4. Explain whether the fact that a building houses a gas versus an electric powered saw affects Taylor RECC's determination that a facility is a saw mill.

RESPONSE: WITNESS: Mike Skaggs, Engineer, Taylor RECC. Defendant would have no reason to identify a prospective service as a sawmill unless it were called upon to provide electric service thereto. However, it seems intuitive that it is the function of the service, and not the manner in which it is energized, which defines the particular character of that service.

5. Refer to Taylor RECC's tariff sheet number 15, section 4. State under what circumstances a saw mill may be considered a permanent structure.

RESPONSE: WITNESS: Barry Myers, Manager, Taylor RECC, Mike Skaggs, Engineer, Taylor RECC. Tariff sheet number 15, section 4 pertains exclusively to mobile homes.

6. Refer to Taylor RECC's tariff sheet number 23.

a. State whether a "Large Power Contract" will be required for Complainant to receive service.

b. Explain why Complainant is not entitled to a 1,000-foot line extension prior to the charging of an advance, as the tariff states the following, "Line extensions or conversions for three phase powerloads shall be charged an advance for construction when the extension or conversion amounts to more than 1,000 feet".

RESPONSE: WITNESS: Barry Myers, Manager, Taylor RECC. a. A Large Power Contract would be required for the installation of the three phase service necessary to energize this sawmill.

b. Because this sawmill operation is identified under the tariff as a questionable permanent service, the advance is changed under the specific portion of the tariff which applies to sawmills.

7. Explain how the cost of \$7,303.88 for "Installation of 3phs primary" was derived. Provide all supporting calculations.

RESPONSE: WITNESS: Mike Skaggs, Engineer, Taylor RECC. Costing is job-specific. Each construction unit has applicable material and labor cost data in our CIS system. Units required to build the job are entered into our CIS system and associated costs are produced. Supporting documentation identified as Defendant's Exhibits 1-A thru 1-I is attached.

8. Explain how the cost of \$4,304.68 for "Retirement of 3phs primary" was derived. Provide all supporting calculations.

RESPONSE: WITNESS: Mike Skaggs, Engineer, Taylor RECC. See Response to Request 7.

9. Explain how the cost of \$3,237.36 for "Materials" was derived. Provide all supporting calculations.

RESPONSE: WITNESS: Mike Skaggs, Engineer, Taylor RECC. See Response to Request 7.

10. Assume the subject building is not considered a saw mill. Provide a breakdown of the costs that would be charged to Complainant for service.

RESPONSE: WITNESS: Mike Skaggs, Engineer, Taylor RECC. This application for service is made with respect to an operation which could not reasonably be described as anything other than a sawmill. If, as the request suggests, Defendant is called upon to pretend that this proposed service is something which it is not, then, in order to calculate installation costs, Defendant would have to know what that installation should be presumed to be, and what type of service would be required. If, for instance, a residential dwelling were to be located on the site of the sawmill, and because that site is within 1,000 feet of existing service, there would be no cost associated with the extension to that dwelling of single phase service.

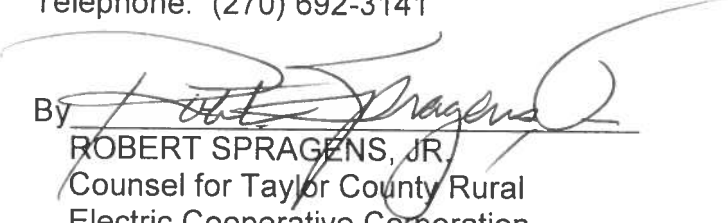
11. Provide any and all documents on file with Taylor RECD related to Complainant's application for electric service, including meeting minutes, correspondence, design, engineering and work plan documents related to the service request.

RESPONSE: WITNESS: Mike Skaggs, Engineer, Taylor RECC; John Patterson, Office Manager, Taylor RECC. Defendant's Exhibits 1-A thru 1-I offered in response to Request 7 constitute all such documents maintained in Defendant's file on this application.

The undersigned acts as counsel for Taylor County Rural Electric Cooperative Corporation and, acting in that capacity, has supervised the preparation of this Response, which is true and accurate to the best of counsel's knowledge, information and belief formed after a reasonable inquiry.

DATED this 18TH day of July, 2013.

SPRAGENS & HIGDON, P.S.C.
Attorneys at Law
15 Court Square - P. O. Box 681
Lebanon, (270) 692-3141
Telephone: (270) 692-3141

By 
ROBERT SPRAGENS, JR.
Counsel for Taylor County Rural
Electric Cooperative Corporation

I hereby certify that a true copy of
the foregoing was mailed this
18TH day of July, 2013, to:

Original and 8 Copies

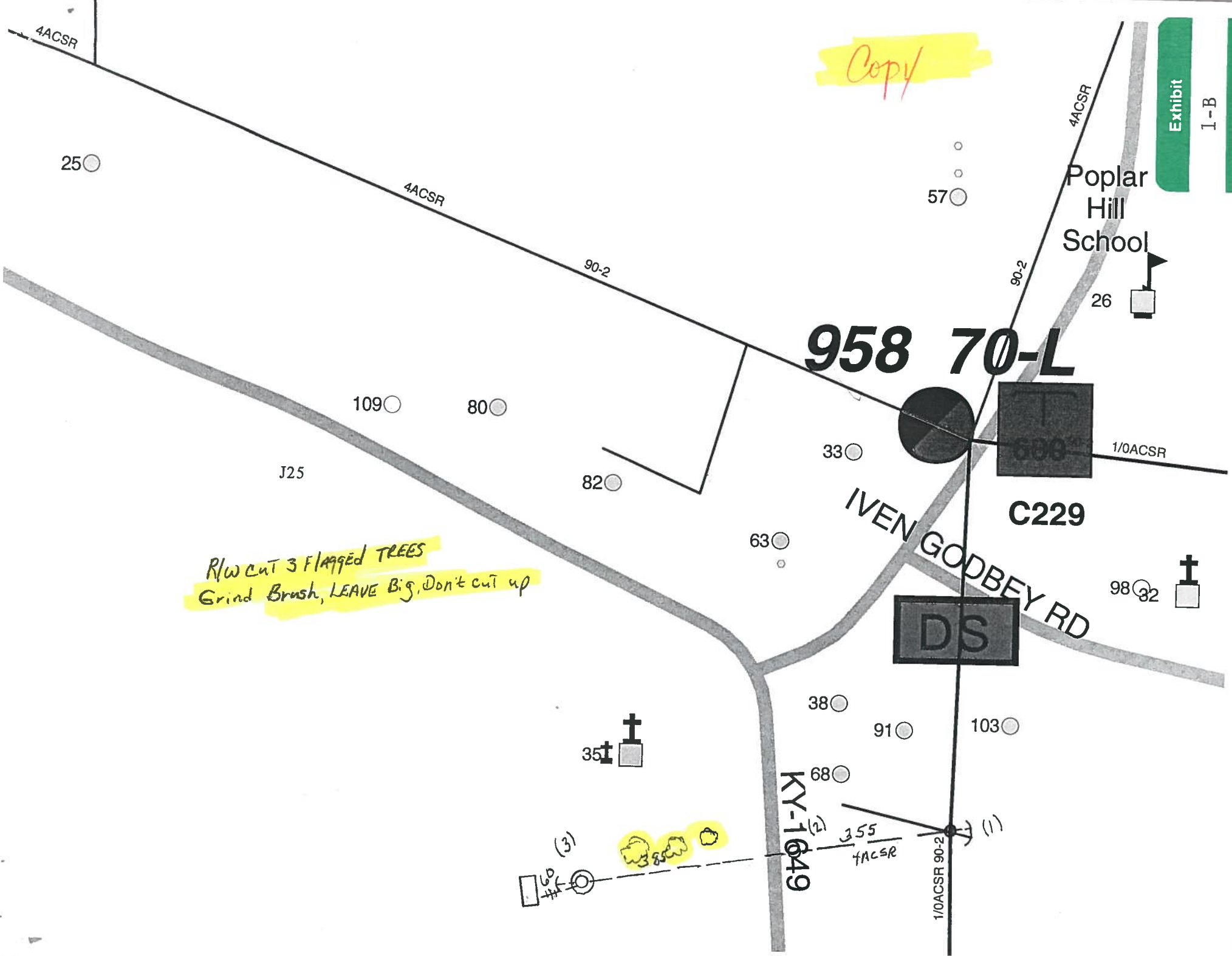
Mr. Jeff Derouen, Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
P.O. Box 615
Frankfort, Kentucky 40602

Frank McAninch
1341 Ivan Godbey Rd.
Liberty, KY 42539
Complainant

By 
Robert Spragens, Jr.

Copy

Exhibit
I-B



R/W cut 3 Flagged TREES
Grind Brush, LEAVE Big, Don't cut up

958 70-L

C229

DS

IVEN GODBEY RD

KY-1649

Poplar Hill School

(3)

(2)

(1)



355
4ACSR

1/0ACSR 90-2

25

4ACSR

90-2

57

4ACSR

90-2

J25

109

80

82

33

1/0ACSR

63

98

35

38

91

103

68

DATE 11/5/2012

INFO TAKEN BY: ERIN

FROM: FRANK MCANINCH
PHONE X OFC RDO

JOB/WORK ORDER NO. 112520

THIS LINE TO BE STAKED IN CASEY COUNTY.

APPLICANTS NAME: FRANK MCANINCH

NEW MAP # J25#109
SUBSTATION Dh11
CIRCUIT # 2
POINT # 958
UP-LINE DEVICE 70L
SCALE 1" = 200'

MAILING ADDR 1341 IVEN GODBEY RD, LIBERTY
911 ADDRESS

DISTANCE FROM EXISTING PRIMARY LINE _____

CLOSEST PERSON RECEIVING SERVICE GARY MEANS ACROSS RD.

NR MAP# J25-82

REMARKS CALL BEFORE GOING - MCANINCH WANTS TO MEET W/ ENGR.

STAKE FOR 3PHS SVC TO EXISTING SHOP BLDG FOR FARM USE - WANT 120/240V . OH W/ MTR ON BLDG.

CHARGES MAY APPLY AND ARE BASED ON ENGINEERS FINDINGS WHEN SURVEYED.

CHECK
Square Footage of Structure 36 X 48
HEAT TYPE
Main Size 200 Unit tonnage
GET MSF APPL. YES NO
TEMP SERVICE YES NO
S/L CONTRACT YES NO
TRAILER GUIDE YES NO
R/W EASEMENT TAKE-OFF GEORGE BAKER

COLLECT
107.2
252A

142621

CONST. COSTS DUE _____

HOME PHONE _____

CELL PHONE 787-0120

WORK PHONE _____

SOCIAL SECURITY# _____

SOCIAL SECURITY# _____

CREDIT HISTORY O.K.

STAMP
PAID HERE

Copy

ADDT'L NOTES:

Mike,
Load Data info is attached.
Once you have sized the trf, give
back so that I can file.

RATE SCHEDULE

FARM

USE MEMBER #

70569

144.1

DEPOSIT QUOTED _____

3-15 (45)
elf Cont'd Meter Base (4w) ?
0 ACSR / 2 ACSR N ?
2/0 Only w 4/0 Opt ?
Egin see me

Taylor County Rural Electric CoOperative Corporation

Date 11/16/2012

QUESTIONABLE PERMANENT COST FIGURES

FOR: Work Order Number 112520 Name FRANK MCANINCH

INSTALL LABOR		\$	3,175.60
RETIREMENT LABOR		\$	<u>1,871.60</u>
TOTAL LABOR COST		\$	5,047.20
LABOR OVERHEAD	130%	\$	6,561.36
MATERIAL COST		\$	3,237.36
TOTAL JOB COST		\$	<u>14,845.92</u>

Copy

Questionable permanent costs are refunded at 10% of the consumers yearly power bill for this location.

Exhibit

1-D

Copy

Job Help

Option:

Notes

Job | | | |

Job: Name: Service:

Utility/Contract	Install	Retire
Hours:	<input type="text" value=".00"/>	<input type="text" value=".00"/>
Labor:	<input type="text" value=".00"/>	<input type="text" value=".00"/>
Overhead:	<input type="text" value=".00"/>	<input type="text" value=".00"/>
Major Material:	<input type="text" value="3,237.36"/>	<input type="text" value="3,237.36"/>
Minor Material:	<input type="text" value=".00"/>	<input type="text" value=".00"/>
Transportation:	<input type="text" value=".00"/>	<input type="text" value=".00"/>
Stores:	<input type="text" value=".00"/>	
Total:	<input type="text" value="3,237.36"/>	<input type="text" value="3,237.36"/>
Net:	<input type="text" value=".00"/>	

Contract	
Install Hot:	<input type="text" value="3,175.60"/>
Install Cold:	<input type="text" value=".00"/>
Retire Hot:	<input type="text" value="1,871.60"/>
Retire Cold:	<input type="text" value=".00"/>
Estimated Hours:	<input type="text"/>
Estimated Labor:	<input type="text"/>
Estimated Materials:	<input type="text"/>
Estimated Overhead:	<input type="text"/>

TAYLOR COUNTY RECC
UPN USER # 2017

MATERIAL TICKET
JOB # 112520

PAGE 1
RUN DATE 11/16/12 09:46 AM

DESC MCANINCH FRANK SAWMILL3PHS MBRNO 70569 STATE 1 DESIRED 11/05/12
WO NO 100 LOCATION 1925010900 CNTY 2 APPLDTE 11/05/12
WKPLAN 11 000102 CREW TAXCD 2 CITY STKDATE 11/15/12
WHS NO 1 STAKED BY DW DIST 2 RELDATE

COMMENTS:

STATISTICS	PRIM	SECD	SERV	TRAN	CONS	SL	MET	TRA	POLE	INC CAPC
CONST:OVERHEAD	740		60		1				2	
UNDERGRD										
RET :OVERHEAD										
UNDERGRD										

DESCRIPTION	CONST NO	REC UNIT	INSTALL	RETIRE
4/0 QP WIRE	4/0QP		60	60
4 ACSR PRI WIRE	4ACSR		2960	2960
C2.24 3 PH X-ARM CONST DBL PRI	C1-1		1	1
C5.71L SNGL DE CROSSARM ASSEMBLY	C7A		2	2
E1.1L 7/16 GUY WIRE 10M FOR RECC	E1-3		4	4
GUY (GUARD) MARKER	E3-10		4	4
EXTENSION GUY BREAKER	EGB		4	4
ANCHOR, SCREW TYPE 3PH	F1-4S		2	2
3PH TRF BNK 120 / 240 VOLT	G310		1	1
SECONDARY ASSEMBLY	J6C		1	1
SERVICE	K11C		1	1
GROUND ROD - NEUTRAL ASSEMBLY	M2-11		1	1
GROUND - NEUTRAL PLATE ASSEMBLY	M2-12		2	2
OVERHEAD SERVICE	OH SER		1	1
40FT POLE	P40		1	1
45' POLE	P45		1	1
ANCHOR-GUY		99364001	2	2
BRACKET TRANSFORMER CLUSTER		99364002	1	1
CROSSARM		99364003	5	5
POLE 40&45		99364005	2	2
GROUND		99365002	3	3
INSULATOR, STRING		99365004	6	6
4 ACSR		99365039	2960	2960
OH SERVICE		99369001	1	1

MAJOR MATERIAL ITEMS

DESCRIPTION	MAT ITEM	INSTALL	RETURN	SALVAGE
ANCHOR PATENT 10" (S=18M# B=21M#)	00992000	2		2
GUY ATTACH (HANGER/GOATHEAD)	02150000	4		4
GUY INS(EGB) 1'-4'-6' FIBER LINK	02160000	4		4
BOLTS, CARRIAGE	06310000	6		6
BOLTS, DOUBLEARM	06330000	4		4

Copy



(270) 465-4101 • Fax (270) 789-3625
(800) 931-4551

November 19, 2012

Mr. Frank McAninch
1341 Iven Godbey Rd
Liberty KY 42539

Ref: wo#112520

The staking to provide 3-phase electric service to a sawmill has been drawn. Sawmills are considered questionable/permanent on our system, and construction/retirement fees are collected up front and refunded at 10% of the annual power bill. The charges for the work order drawn up are as follow:

Installation of 3phs primary	\$ 7,303.88
Retirement of 3phs primary	4,304.68
Material	<u>3,237.36</u>
	\$14,845.92

We did receive the load data information today.

Please contact our office with any questions.

Sincerely,

Erin Wise
Engineering Dept.

/ew

Copy

Name FRANK McANINCH Address 1341 Ives UTahby Rd, Liberty, Ky
 Business Name RICH HILL FARMS Phone 606-787-0120 42539

General Contractor

Electrical Contractor

Firm/Contact _____

Firm/Contact _____

Address _____

Address _____

Phone _____ Fax _____

Phone _____ Fax _____

Project & Electrical Entrance Information

Location _____

Type of Operation _____

Service date required: Temporary 1/1

Permanent 1/1

Requested service size: 400 Amp _____ 1 Phase _____ 3 Phase _____ Overhead _____ Underground _____

Size & number of service entrance conductors: 500 MCM = 4

Requested service voltage: 120/240 _____ 120/208 _____ 240/480 _____ 277/480 _____ 7200/12470

Structure size (sq ft) _____ Multi-family unit Y N Number of units _____

Total Connected Load Data (Voltage x Current = Wattage)

(Note: If you can only give amps, then we must know at what voltage these amps will be used.)

Total project load: 60 kW 3Phase only 10 kW 1 Phase only

Anticipated demand factor: 70 % Diversity factor: _____ % Load factor: _____ %

Anticipated future load: 5 kW 3Phase only _____ kW 1 Phase only

Load Listing (Note: Apartment complexes list typical per load for each type apartment.)

Heat _____ kW Type installation _____ Water heater _____ kW 1 Phase _____ kW 3 Phase

Air Conditioning _____ kW _____ BTU _____ 1 Phase _____ 3 Phase _____ Number of Units _____

Lighting _____ Total kW Miscellaneous small appliances and motors _____ Total kW.

Motor Load and Miscellaneous Equipment Listing: (single loads over 5kW) Full Load Amps

Description	Size	Voltage	Type Starting	1 Phase	3 Phase
<u>BACK 1-SHEET AT</u>			<u>MAGNETIC</u>		
			<u>MAGNETIC</u>		
			<u>SOME CAPACITOR'S USED ON SOME MOTOR'S</u>		

NO SOFT START

SOME CAPACITOR'S USED ON SOME MOTOR'S

(Attach sheet or add to back any more equipment not able to fit in the space provided above.)

Please note and describe any portion of proposed load possessing unusual voltage or current sensitivity or other special considerations

AT SHEET

Exhibit

Load sheet must be completed, signed, and returned to our engineer before any work will

be done concerning your job.

Information provided by: Frank McAninch Signature Frank McAninch Date: 11-19-12

1-H

Copy

25 HP	120/240	68 AMPS	18650
10 "	120/240	28 "	10746
10 "	120/240	28 "	10746
10 "	120/240	28 "	10746
10 "	120/240	28 "	10746
5 "	120/240	15 "	3710
5 "	120/240	15 "	3710
<u>75 HP</u>		<u>210 AMPS</u>	<u>7400 (90)</u>

1/0

DRYER = 40 AMP 7 1/2 HP. 5595 WATTS
 FANS = 2 2 HP EACH 4-HP 24 AMP / 2984
 LIGHTING / GEN. REC. LOAD 4800
 1/0 = 13,500 WATTS

Copy

