

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF SHELBY ENERGY	)	
COOPERATIVE, INC. FOR AUTHORIZATION	)	
OF CHANGES IN SERVICE TERRITORY WITH	)	CASE NO.
BLUE GRASS ENERGY COOPERATIVE	)	2018-00310
CORPORATION	)	

COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION  
TO SHELBY ENERGY COOPERATIVE, INC.

Shelby Energy Cooperative, Inc. (Shelby Energy), pursuant to 807 KAR 5:001, is to file with the Commission the original and three copies of the following information, with a copy to all parties of record. The information requested herein is due on or before November 20, 2018. Responses to requests for information shall be appropriately bound, tabbed, and indexed. Each response 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 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.

Shelby Energy shall make timely amendments to any prior response if it obtains information which indicates that the response was incorrect when made or, though correct

when made, is now incorrect in any material respect. For any request to which Shelby Energy fails or refuses to furnish all or part of the requested information, it shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied 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 filing a document containing personal information, Shelby Energy shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. State whether Brian Richardson, the staking technician for Shelby Energy, has the authority to bind Shelby Energy in this agreement. If not, provide an agreement consistent with agreements Shelby Energy has filed in previous Commission cases, 2014-00223<sup>1</sup> and 2016-00358,<sup>2</sup> that have been attached as Appendix A and Appendix B respectively, to this request for information for reference.

2. State the manner in which the owner of the Snook Property was given notice of the proposed change in service territory.

3. State whether the owner of the Snook Property has agreed to the proposed change in service territory. If yes, state the manner in which the owner of the Snook Property agreed to the proposed change in service territory.

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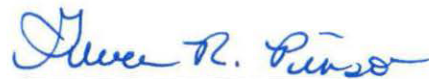
<sup>1</sup> Case No. 2014-00223, *Application of Shelby Energy Cooperative, Inc. for Authorization of Changes in Service Territory with Kentucky Utilities Company, Specifically Meadow Glen Subdivision*, Application for Changes in Service Territory (filed July 17, 2014).

<sup>2</sup> Case No. 2016-00358, *Application of Louisville Gas and Electric Company and Kentucky Utilities Company for Authorization of Changes in Service Territory with Shelby Energy Cooperative, Inc.*, Application for Changes in Service Territory (filed Oct. 3, 2016).

4. State whether Shelby Energy has ever provided service to any portion of the Snook Property in the past. If yes, state the nature of the prior service and the dates of prior service.

5. State whether Blue Grass Energy has ever provided service to any portion of the Snook Property in the past. If yes, state the nature of the prior service and the dates of prior service.

6. Refer to Shelby Energy's response to Commission Staff's First Request for Information, Response to Request No. 5 in which Shelby Energy states that "it is believed that Hon. Howard Downing, Counsel for Blue Grass Energy, has submitted these costs to the Commission." Provide these costs, as Mr. Downing has not provided them, to the Commission.



Gwen R. Pinson  
Executive Director  
Public Service Commission  
P.O. Box 615  
Frankfort, KY 40602

DATED NOV 01 2018

cc: Parties of Record

APPENDIX A

APPENDIX TO A REQUEST FOR INFORMATION OF THE KENTUCKY  
PUBLIC SERVICE COMMISSION IN CASE NO. 2018-00310 DATED **NOV 01 2018**

ONE PAGE TO FOLLOW

AGREEMENT TO AMEND CERTIFIED SERVICE TERRITORY BOUNDARY

WHEREAS, Kentucky Utilities Company ("KU") and Shelby Energy Cooperative, Inc. ("Shelby Energy") both provide electrical service to Meadow Glen Subdivision Sections I, II, and III ("Meadow Glen") in Shelbyville, Kentucky and agreed in February 2010 to exchange certain lots within that subdivision, but the certified service territory boundary was never filed with the Public Service Commission ("PSC"); and

WHEREAS, all lots in Meadow Glen are developed and already receiving electric service and the existing territorial boundaries need to be adjusted in order to prevent duplication of power line facilities, equipment, and appurtenances in order to provide more economical electric service to these customers;

NOW THEREFORE, in consideration of amending the existing certified territory boundary line previously approved by the PSC, the parties hereby agree as follows:

1. KU and Shelby Energy currently share certified service territory boundary lines approved by the PSC.
2. A portion of Meadow Glen in Shelbyville, Kentucky currently lies in each utility's certified service territory.
3. The parties agree that Lots 1-13, Lots 69-78, Lots 54-68, and Lots 49-52 which are already being served by KU will be moved into KU's certified service territory, and the parties agree that Lots 14-31, Lots 32-35, and Lots 36-48 which are already being served by Shelby Energy will be moved into Shelby Energy's certified service territory.
4. The amended certified service territory boundary lines that have been agreed to by the parties are illustrated by the accompanying maps.
5. The certified service territory boundary as amended shall prevent any duplication of power line facilities, equipment and appurtenances.
6. This agreement does not affect any other certified service territories of the respective utilities.
7. This agreement shall go into full force and effect upon Order of the PSC approving this agreement.

SHELBY ENERGY COOPERATIVE, INC.

By:

Debra J. Martin  
Debra J. Martin  
President & CEO

KENTUCKY UTILITIES COMPANY

By:

Frank R. Bryant  
Title:

Frank R. Bryant  
Manager, Distribution Operations  
Kentucky Utilities Company

APPENDIX B

APPENDIX TO A REQUEST FOR INFORMATION OF THE KENTUCKY  
PUBLIC SERVICE COMMISSION IN CASE NO. 2018-00310 DATED **NOV 01 2018**

ONE PAGE TO FOLLOW



**AGREEMENT**

Louisville Gas & Electric Company (LG&E), Kentucky Utilities Company (KU) and Shelby Energy Cooperative Inc (Shelby) hereby agree that LG&E will serve lots 1 – 9 (future development) within the Estates of Notting Hill Subdivision Phase II in Shelby County, Kentucky. LG&E currently provides electric service to all existing lots within Notting Hill.

Shelby will serve lots 1 – 9 on Pounds Lane (Shelby Woods Subdivision) as well as the address at 981 Pounds Lane and a portion of 973 Pounds Lane, all located in Jefferson County Kentucky. Shelby currently provides electric service to each of these Jefferson County lots. LG&E will be responsible for notifying the Public Service Commission of this boundary change.

Shelby Energy Cooperative Inc.

By [Signature]  
Title V.P. of Oper + Eng  
Date 8-19-16

Louisville Gas & Electric Company

By [Signature]  
Title Mgr LG&E DESIGN  
Date 8-19-16

Kentucky Utilities Company

By [Signature]  
Title Manager, Operations  
Date Aug 18, 2016

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