

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF BLUE GRASS ENERGY)	
COOPERATIVE CORPORATION FOR AN ORDER)	
AND CERTIFICATE OF PUBLIC CONVENIENCE)	CASE NO.
AND NECESSITY AUTHORIZING APPLICANT TO)	2004-00374
CONSTRUCT A DISTRICT OFFICE BUILDING,)	
SERVICE CENTER AND STORAGE YARDS AT)	
CYNTHIANA, KENTUCKY)	

SECOND DATA REQUEST OF COMMISSION STAFF
TO BLUE GRASS ENERGY COOPERATIVE CORPORATION

Pursuant to 807 KAR 5:001, Commission Staff requests that Blue Grass Energy Cooperative Corporation (“Blue Grass Energy”) file the original and 5 copies of the following information with the Commission within 20 days of the date of this request, with a copy to all parties of record. Each copy of the information requested should be placed in a bound volume with each item tabbed. When a number of sheets are required for an item, each sheet should be appropriately indexed, for example, Item 1(a), Sheet 2 of 6. Include with each response the name of the witness who will be responsible for responding to questions relating to the information provided. Careful attention should be given to copied material to ensure its legibility. 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.

1. Provide the following information regarding Blue Grass Energy’s headquarters facilities on Lexington Road in Jessamine County:

- a. Square footage of the office building.
- b. Square footage of the warehousing facilities.

c. Total acreage of the site, including structures, parking and storage.

d. Total number of employees based at the site. Show separately the total number of employees working in the headquarters building and the total number of employees based at warehousing/line crew facilities.

e. Total square footage of any unutilized space in the headquarters building.

2. Explain whether any of Blue Grass Energy's billing function is performed at its headquarters.

a. If billing functions are performed at the headquarters, identify whether the billing is for all Blue Grass Energy members, or if billing done at the Lexington Road headquarters is only for pre-merger Blue Grass Energy members.

b. If applicable, provide the number of employees involved in the billing function at the headquarters building.

3. Explain whether Blue Grass Energy compared the size and cost of the proposed district office facilities in Harrison County to the district office facilities of any other electric cooperatives in Kentucky.

If comparisons were made, provide:

a. The name of the cooperative.

b. The location of the facility.

c. The square footage of the facility.

d. The cost of the facility.

e. Total number of employees based at the site. Show separately the total number of employees working in the district office building and the total number of employees based at warehousing/line crew facilities.

4. Explain whether the purchase of suitable existing commercial facilities was ever considered as an option to building new facilities in Harrison County.

5. Explain whether the proposed 3 phase extension associated with Blue Grass Energy's proposal will be constructed within Blue Grass Energy's existing service territory. If not, does Blue Grass Energy expect any difficulty or opposition to obtaining the necessary rights-of-way? Explain the response.

6. Refer to Exhibit B of the application. Explain whether it is likely that the entire \$325,000 shown for "Schematic Construction Contingency" included in the Budget Cost Estimation will be spent.

7. Has the number of employees working at the Oddville Avenue office building in Cynthiana, Kentucky changed since the merger of Blue Grass Energy and Harrison County Rural Electric Cooperative Corporation?

a. Also explain whether Blue Grass Energy believes it is effectively utilizing all available space at the Oddville Avenue facility.

b. Explain whether the Oddville Avenue and the New Lair Road facilities have been offered for sale. If yes,

(1) Provide the date when each property was first offered for sale.

(2) Describe any interest that has been shown for either property.

8. Provide a projection of the number of employees that will be working from the proposed district office for each of the next 10 years.

9. Provide the average number of bills that are paid monthly, in person, at each Blue Grass Energy office.

10. Provide a breakdown by dollar amount of construction expense at each Blue Grass Energy office facility for the prior 3 years and a projection for the upcoming 5 years.



Beth O'Donnell
Executive Director
Public Service Commission
P. O. Box 615
Frankfort, KY 40602

DATED January 26, 2005

cc: All Parties