

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

PETITIONS OF KENTUCKY UTILITIES	)	
COMPANY AND BLUE GRASS ENERGY	)	
COOPERATIVE CORPORATION TO BE	)	CASE NO. 2006-00214
DESIGNATED AS THE RETAIL ELECTRIC	)	
SUPPLIER FOR THE NEW WAL-MART	)	
STORE IN CYNTHIANA, KENTUCKY	)	

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

Pursuant to 807 KAR 5:001, Blue Grass Energy Cooperative Corporation ("Blue Grass") is requested to file with the Commission the original and 8 copies of the following information, with a copy to all parties of record. The information requested herein is due within 10 days of the date of this request. Each copy of the data 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 person who will be responsible for responding to questions relating to the information provided. Careful attention should be given to copied material to ensure that it is legible. Where information herein has been previously provided, in the format requested herein, reference may be made to the specific location of said information in responding to this information request.

1. Pursuant to KRS 278.017(3)(a), describe with specificity the proximity of your existing distribution lines to the proposed site of the Wal-Mart SuperCenter that is

the subject of this case. To the extent not already provided by you in this case, provide any relevant supporting materials and documents to include aerial photographs, maps, etc.

2. Pursuant to KRS 278.017(3)(b), state the date that Blue Grass was first furnishing service to this customer and/or in this area, and the age of Blue Grass's facilities in this area.

3. Pursuant to KRS 278.017(3)(c), describe with specificity:

a. The adequacy and dependability of Blue Grass's existing distribution lines, which will actually serve this area and/or customer, to provide dependable, high quality retail electric service.

b. The reasons that Blue Grass believes its facilities in this area are better equipped to provide dependable, high quality retail electric service to this customer. Include a comparison between its facilities and those of Kentucky Utilities Company ("KU").

c. Provide a comparison of the costs, including installation and rates, between Blue Grass and KU, which are required to provide dependable, high quality retail electric service to this customer.

4. Pursuant to KRS 278.017(3)(d), describe with specificity the reasons that Blue Grass contends that Blue Grass's service to this customer will more likely result in the elimination and prevention of duplication of electric lines and facilities supplying this territory.

5. Describe the reasons that Blue Grass does or does not assert that this customer represents a "new electric consuming facility" and the reasons that this characterization is or is not relevant herein.

6. To the best of your knowledge and belief, provide the date-certain that the customer will need additional service at the proposed Wal-Mart SuperCenter.

A handwritten signature in black ink, consisting of several overlapping loops and a long horizontal stroke at the end, positioned above a solid horizontal line.

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

DATED: July 25, 2006

cc: Parties of Record