COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF SOUTH KENTUCKY RURAL)	
ELECTRIC COOPERATIVE CORPORATION)	CASE NO.
FOR A CERTIFICATE OF CONVENIENCE AND)	2010-00055
NECESSITY TO CONSTRUCT ADDITIONAL)	
LINES AND FACILITIES)	

<u>DATA REQUEST OF COMMISSION STAFF TO</u> SOUTH KENTUCKY RURAL ELECTRIC COOPERATIVE CORPORATION

South Kentucky Rural Electric Cooperative Corporation ("South Kentucky RECC"), pursuant to 807 KAR 5:001, is to file with the Commission the original and four copies of the following information. The information requested herein is due no later than ten days after the issuing date of this data request. Responses 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 the 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.

South Kentucky RECC shall make timely amendment to any 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 South Kentucky RECC 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 another proceeding in the requested format, reference may be made to the specific location of that information in responding to this request.

- 1. Refer to Section II, H, page 14, of the Construction Work Plan ("CWP") provided with South Kentucky RECC's Application. South Kentucky RECC refers to an analysis disc providing "circuit loading by substation and line section, voltage drops on a 120 volt base, primary losses, number of consumers by section, circuit, and substation, primary conductor size and miles from the sub, and fault current levels." Provide this disc, along with Map 1, Map 2, Appendix 1, Appendix 2, and Appendix 3 mentioned in Section II, H.
- 2. Refer to Section II, H, page 14, paragraph 7, of the CWP. South Kentucky RECC states that a discussion concerning regulator changes necessary to maintain adequate voltage will take place on page 28. As page 28 fails to address these issues, provide the relevant dialogue.

- 3. Refer to Section I, F, page 5, of the CWP. The total for the column labeled System Improvements is listed as \$12,510,445. The System Improvement amounts for the years 2010 through 2013 sum to \$12,333,295. Indicate which amount is correct and, if necessary, supply an updated table for Section I, F with the correct totals.
- 4. Refer to Section II, B, page 7, of the CWP. The 2010-2013 total for Code 300 is \$3,495,300. Refer to pages 21 and 22 of the CWP. The total cost of the multiphase jobs (\$766,300), the total cost of the three voltage conversions (\$241,800 = \$50,000 + \$54,000 + \$137,800), and total cost of the conductor replacement items (\$2,544,700) sum to \$3,552,800. Refer to page 22 where the CWP states, "Total Code 300 costs = \$3,676,550." Reconcile the differences among these three amounts \$3,495,300, \$3,552,800, and \$3,676,550.
- 5. Refer to the Service Interruptions table in Section II, F, page 13, of the CWP.
- a. The row total for the Year 2006 is reported as 3.22. Should this amount be 3.82?
- b. The Five Year Average for the Total Column is reported as 3.80. Should this be restated if the row total for the Year 2006 is 3.82?
- c. Provide an updated Service Interruptions table with correct row and column totals.

6. Refer to the Historical Annual Energy, Load and Consumer Data table in Section II, G, page 13, of the CWP. Verify that the Annual Load Factor reported for 2003 is 38.0 percent. Show all calculations.

Jeff/Derouen

Executive Director

Public Service Commission

P. O. Box 615

Frankfort, Kentucky 40602

DATED: APR 1 2 2010

cc: Parties of Record

Stephen Johnson Vice President of Finance South Kentucky R.E.C.C. 925-929 N. Main Street P. O. Box 910 Somerset, KY 42502-0910

Honorable Darrell L Saunders, P.S.C. Attorney at Law 700 Master Street P.O. Box 1324 Corbin, KY 40702