

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF JACKSON ENERGY)	
COOPERATIVE CORPORATION FOR A)	
CERTIFICATE OF CONVENIENCE AND)	CASE NO.
NECESSSITY TO CONSTRUCT A BUILDING)	2011-00178
ADDITION AT THE LONDON OFFICE)	
PURSUANT TO KRS 278.020 AND 807 KAR)	
5:001, SECTION 9)	

COMMISSION STAFF'S SECOND REQUEST FOR
INFORMATION TO JACKSON ENERGY COOPERATIVE

Jackson Energy Cooperative Corporation ("Jackson Energy"), pursuant to 807 KAR 5:001, is to file with the Commission the original and six copies of the following information, with a copy to all parties of record. The information requested herein is due 14 days from the date of this Order. 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 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.

Jackson Energy shall make timely amendment 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 Jackson 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 applicable, the requested information shall be separately provided for total company operations and jurisdictional operations.

1. Refer to Jackson Energy's response to Item 4(a) of Commission Staff's First Information Request ("Staff First Request"). The response states that the field employees do not currently have work space because when the building was constructed in 1988, the field employees did not need a work space. Provide an estimate of the amount of time field employees currently spend in the office versus time spent out of the office.

2. Refer to Jackson Energy's response to Item 4(b) of Staff's First Request.

- a. The response states that "[t]he maximum seating capacity of 192 was noted to illustrate the maximum available space." Paragraph 3 of the application states that "[t]he proposed London building addition . . . will consist of 11,368 square feet of office and training space that includes office space for 27

employees and a training area for a minimum seating of 192.” Clarify whether the training area is designed for a minimum or maximum seating of 192.

b. What is the total size of Jackson Energy’s workforce?

c. What facility is Jackson Energy currently using to house its command center and storm crews? How large is this current facility?

3. Refer to Jackson Energy’s response to Item 5(a) of Staff’s First Request, wherein it is stated that “[a]ll three contractors said that it would be nearly impossible to competitively bid a design-build project as all three designs would be different, especially the total price.” Explain more fully why it would be “nearly impossible” to have a design-build project be subject to a competitive bid.

4. Refer to Jackson Energy’s response to Item 5(c) of Staff’s First Request. Provide a detailed description of the scope and size of the Jackson Energy headquarters facility and the McKee branch office and warehouse constructed by McKnight & Associates in 2000 and 2002, respectively. Include in this description the original estimated cost for each project and the total number of office and field personnel based at each facility at the time of construction



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DATED SEP 06 2011

cc: Parties of Record

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