

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

WILLIAM ALLEN ROBERTS	)	
	)	
COMPLAINANT	)	
	)	
V.	)	CASE NO.
	)	2011-00314
TAYLOR COUNTY RURAL ELECTRIC	)	
COOPERATIVE CORPORATION	)	
	)	
DEFENDANT	)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION  
TO WILLIAM ALLEN ROBERTS

William Allen Roberts ("Complainant") is to file with the Commission the original and ten copies of the following information, with a copy to all parties of record. The information requested herein is due no later than 14 days from the date of issuance of this request. 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.

Complainant shall make timely amendment to any prior response if he 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 Complainant fails or refuses to furnish all or part of the requested information, he shall provide a written explanation of the specific grounds for his failure to completely and precisely respond.

Careful attention should 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.

1. Regarding Complainant contacting Taylor County Rural Electric Cooperative Corporation ("Taylor County") about the installation of electric utility service at 728 Lether Burton Road, Columbia, Kentucky ("the Roberts property"):

a. Provide the date Complainant first contacted Taylor County about having electric utility service installed at the Roberts property and how the contact was made, i.e., in person, by phone, written request, etc.

b. Provide Taylor County's response to Complainant's first request to have electric utility service installed at the Roberts property.

2. Taylor County's Answer at Paragraph 7 states that it is familiar with 807 KAR 5:041(11) which requires, in the case of normal extensions, a distribution utility to construct, at its cost, facilities by means of which it extends for a distance of no more than 1,000 feet its existing distribution line to the property of a prospective customer. 807 KAR 5:041 Section 11(2)(a) states that, when an extension of the utility's line is

greater than 1,000 feet per customer, the utility may, if not inconsistent with its filed tariff, require the total cost of the excess footage over 1,000 feet per customer to be deposited with the utility by the applicant, based on the average estimated cost per foot of the total extension. Taylor County's tariff at Sheet No. 14, concerning Line Extensions for New Services, states that:

2. Other Extensions:

(a) When an extension of the Cooperatives distribution line to serve an applicant or group of applicants amounts to more than 1000 feet per customer, the cooperative shall require the total cost of the excessive footage over 1000 feet per customer to be deposited with the cooperative by the applicant or applicants. The cost per foot for single phase extensions shall be \$2.93.

(b) Each customer receiving service under such extensions will be reimbursed under the following plan: Each year for a period of not less than ten (10) years, which for the purpose of this rule shall be the refund period, the cooperative shall refund to the customer or customers who paid for the excessive footage the cost of 1000 feet of the extension in place for each additional customer connected during the year whose service line is directly connected to the extension installed and not to extensions or laterals therefrom, but in no case shall the total amount refunded exceed the amount paid the cooperative. At the end of the refund period no refund will be required to be made.<sup>1</sup>

Explain whether Taylor County has informed you of its Tariff Section 14, 2 (a) and (b).

3. The Complaint states that a cabin with a basement has been built on the site at the Roberts property and that the house has not been completed due to not having electric service.

a. Provide the date on which construction of the cabin began.

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<sup>1</sup> Taylor County Rural Electric Cooperative Corporation Rates, Rules and Regulations for Furnishing Electricity, Tariff Sheet No. 14, paragraphs 2.(a), (b), effective October 28, 1992.

b. Explain whether a generator was utilized at the site for the construction done on the cabin.

c. If the Answer to the preceding item is “no”, explain how the construction on the cabin was performed if electric service was not available at the site.

d. In addition to the cabin, is construction of a house also planned to occur at the Roberts property site or does the statement “(h)ouse has not been completed due to not having electric” refer to the remaining work to be completed on the cabin?

4. Describe the approximate stage of construction of the cabin.

5. Taylor County’s Answer at Paragraph 4.d. states that the county road ends before reaching Complainant’s property and that access from that road to Complainant’s property is achieved through a non-exclusive use for access purposes of a 20-foot private roadway, which privilege is either granted or retained by as many as three other parties.

a. Provide copies of any and all easements, including Deed Book and Page Number, identifying the manner in which Complainant acquired roadway access to the subject property at Lether Burton Road.

b. Identify all other parties who also possess a right of ingress and egress for access purposes of the 20-foot private roadway that Complainant utilizes to access his property.

6. Provide copies of the plumbing and septic system permits for the Roberts property.



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Jeff Derouen  
Executive Director  
Public Service Commission  
P.O. Box 615  
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DATED OCT 27 2011

cc: Parties of record

Case No. 2011-00314

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