

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF SHELBY ENERGY)	
COOPERATIVE, INC. FOR AUTHORIZATION)	CASE NO.
OF CHANGES IN SERVICE TERRITORY WITH)	2014-00224
KENTUCKY UTILITIES COMPANY,)	
SPECIFICALLY OLD MILL VILLAGE AND)	
ROLLING RIDGE SUBDIVISIONS)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
AND PRODUCTION OF DOCUMENTS
TO SHELBY ENERGY COOPERATIVE, INC.

Shelby Energy Cooperative, Inc. ("Shelby Energy"), pursuant to 807 KAR 5:001, is to file with the Commission the original paper copy and an electronic copy of the following information, with a copy to all parties of record. The information requested herein is due no later than 14 days after the date of this request. Responses to requests for information shall be appropriately bound, tabbed and indexed. Each response shall include the name of the witness who will be 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.

Shelby 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 Shelby Energy fails or refuses to furnish all or part of the requested information, Shelby Energy shall provide a written explanation of the specific grounds for its 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. Refer to Exhibit 2 to the Application. The current electric service territory boundary for the Old Mill Village/Glenview area as depicted on Exhibit 2 does not match the current electric service territory boundary for the Old Mill Village/Glenview area as depicted on the certified territory map for the Shelbyville Quadrangle (“Shelbyville Map”) that was certified by the Commission in Case No. 1990-00047¹ and signed by representatives of Shelby Energy and Kentucky Utilities Company (“KU”) on July 3, 1990. The Shelbyville Map has a notation “Refer to Agreement dated 2-12-76 Glenview Estates Subd” (“2-12-76 Agreement”).

a. State whether the discrepancy between Exhibit 2 and the Shelbyville Map arises from the 2-12-76 Agreement.

b. If the discrepancy does not arise from the 2-12-76 Agreement, explain the discrepancy between Exhibit 2 and the Shelbyville Map.

¹ Case No. 1990-00047, Application of Kentucky Utilities Company for Authorization of Change in Territory with Rural Electric Cooperative Corporations (Ky. PSC May 25, 1990).

c. Submit a copy of the 2-12-76 Agreement and any maps or exhibits that were attached to the Agreement.

d. Was the 2-12-76 Agreement filed previously with the Commission as part of a formal proceeding? If so, provide the case number and case style of that proceeding.

2. Refer to Exhibit 4 to the Application. The current electric service territory boundary for Rolling Ridge Subdivision as depicted on Exhibit 4 does not match the current electric service territory boundary for Rolling Ridge Subdivision as depicted on the certified territory map for the Simpsonville Quadrangle ("Simpsonville Map"), which was certified by the Commission in Case No. 1992-00543² and signed by representatives of Shelby Energy and KU on October 24, 1992, and October 26, 1992, respectively. The Simpsonville Map has a notation "Refer to Agreement dated 10-18-88 Rolling Ridge Subd" ("10-18-88 Agreement").

a. State whether the discrepancy between Exhibit 4 and the Simpsonville Map arises from the 10-18-88 Agreement.

b. If the discrepancy does not arise from the 10-18-88 Agreement, provide an explanation for the discrepancy between Exhibit 4 and the Simpsonville Map.

c. Submit a copy of the 10-18-88 Agreement and any maps or exhibits attached to the Agreement.

² Case No. 1992-00543, Application of Kentucky Utilities Company for Authorization of Changes in Service Territory with Louisville Gas and Electric Company and the Rural Electric Cooperative Corporation (Ky. PSC Mar. 8, 1993).

d. Was the 10-18-88 Agreement filed previously with the Commission as part of a formal proceeding? If so, provide the case number and case style of that proceeding.



Jeff Derpuen
Executive Director
Public Service Commission
P.O. Box 615
Frankfort, KY 40602

DATED SEP 03 2014

cc: Parties of Record

Paula McClain
Mathis, Riggs & Prather, P.S.C. Attorneys at Law
500 Main Street
Suite 5
Shelbyville, KENTUCKY 40065

Honorable Donald T Prather
Mathis, Riggs & Prather, P.S.C. Attorneys at Law
500 Main Street
Suite 5
Shelbyville, KENTUCKY 40065