

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ROGER D. SHOCKLEE)	
)	
COMPLAINANT)	
)	
V.)	CASE NO.
)	2023-00421
)	
KENERGY CORP.)	
)	
DEFENDANT)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO KENERGY CORP.

Kenergy Corp. (Kenergy), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due on March 22, 2024. The Commission directs Kenergy to the Commission's July 22, 2021 Order in Case No. 2020-00085¹ regarding filings with the Commission. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the question to which the response is made and 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

¹ Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC July 22, 2021), Order (in which the Commission ordered that for case filings made on and after March 16, 2020, filers are NOT required to file the original physical copies of the filings required by 807 KAR 5:001, Section 8).

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.

Kenergy shall make timely amendment to any prior response if Kenergy obtains information that indicates the response was incorrect or incomplete when made or, though correct or complete when made, is now incorrect or incomplete in any material respect.

For any request to which Kenergy fails or refuses to furnish all or part of the requested information, Kenergy shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied and scanned 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. When filing a paper containing personal information, Kenergy shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to the February 23, 2024 response to Complainant's motion, Direct Testimony of Robert Stumph, page 6, which states, "Using the most lenient description of a 'line section', there is not sufficient capacity on the feeder to allow for the solar array."
 - a. Explain what is meant by "most lenient description of a line section."

b. Describe how Kenergy determined the most recent annual one-hour peak load on the line section for purposes of reviewing Mr. Shocklee's application.

c. Describe how Kenergy determined the most recent annual one-hour peak load on the line section using the "most lenient description of a line section."

d. Describe how Kenergy determined the amount of aggregated generation on the circuit, including the proposed generating facility.

e. Provide calculations of the aggregated generation's percentage of the line section's most recent annual one hour peak load as used in reviewing Mr. Shocklee's application.

f. Provide calculations of the aggregated generation's percentage of the line section's most recent annual one hour peak load using the "most lenient description of a line section."

2. Provide a diagram or map of that portion of Kenergy's electric distribution system from the end of the radial distribution circuit to which Complainant's proposed generating facilities would interconnect upstream to the distribution substation and any other source of generation feeding the section of line to which Complainant's proposed generating facilities would interconnect. Such diagram or map shall identify and describe:

a. The primary and secondary circuits that serve the section of line to which Complainant's proposed generating facilities would interconnect.

b. The location and type of all sectionalizing devices, reclosers, and fuses on primary and secondary circuits between the substation (and any other source of

generation) and the section of line to which Complainant's proposed generating facilities would interconnect.

c. The portion of the distribution circuit that Kenergy contends is the applicable "Line Segment," as defined in Kenergy's Tariff, Schedule 46-Net Metering, Sheets 46C.



Linda C. Bridwell, PE
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Public Service Commission
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DATED MAR 08 2024

cc: Parties of Record

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