

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

MENIFEE COUNTY BOARD OF EDUCATION)	
)	
COMPLAINANT)	
)	
V.)	CASE NO.
)	2011-00076
CLARK ENERGY COOPERATIVE, INC.)	
)	
DEFENDANT)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO MENIFEE COUNTY BOARD OF EDUCATION

Pursuant to 807 KAR 5:001, Commission Staff requests Meniffee County Board of Education ("Meniffee County") to file with the Commission the original and 10 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 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.

Menifee County 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 Menifee County fails or refuses to furnish all or part of the requested information, Menifee County 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 Clark Exhibit No. 2 from the July 18, 2011 Informal Conference. Identify what load is served by meter points two and three at the Menifee County High School. Explain.

2. Refer to Clark Exhibit No. 2 from the July 18, 2011 Informal Conference. Did Menifee County consult with Clark Energy Cooperative, Inc. ("Clark Energy") or Clark Energy's electrical contractor as to whether both meter points two and three were required, since they are so close together? Explain.

3. During its annual budget preparation process, does Menifee County compare its past year's actual energy costs to the amounts it had budgeted for that year? Explain.

4. If a variance exists in actual energy costs and budgeted energy costs from one fiscal year to the next, does a review of bills or other analysis occur? Explain.

5. Are there financial controls in place to review large monthly expenditures, such as energy costs, to determine why the monthly bills are what they are? Explain.

6. Provide a copy of the contract agreement with Clark Energy that indicates the minimum contract demand is 135 kW.

7. Provide a list of all of Menifee County's accounts with Clark Energy including service address, meter number, description of the facility, and the rate schedule billed.

8. Refer to paragraph 3 of the Complaint filed April 20, 2011 ("Complaint").

a. Fully describe the addition that required the installation of the underground pad-mount transformer.

b. Did Menifee County hire a third-party company to manage the project? If so, who was hired?

c. Who was responsible for contacting Clark Energy regarding the installation of the underground pad-mount transformer?

d. Describe Menifee County's procedures in administering third-party contracts.

9. In paragraph 5 of the Complaint, Menifee County states that "[t]he overhead transformer system serving the high school account has . . . an average metered demand of 37 KW."

a. When did Menifee County determine that the average metered demand for the overhead transformer system serving the high school account was 37 kW?

b. Did the average metered demand for the overhead transformer system serving the high school account reach 37 kW as a result of transferring load to the new underground pad-mount transformer?

c. Did Menifee County ever contact Clark Energy about being billed a minimum demand of 135 kW, when they were actually experiencing an average metered demand that was much less? If not, why?

10. Refer to paragraph 7 of the Complaint filed April 20, 2011.

a. Discuss the reasons that led Menifee County to request an energy audit of its facilities by Clark Energy in December 2009.

b. Provide a copy of any documentation that Clark Energy produced regarding the results of the audit.


c. What specifically occurred in the energy audit that led to the discovery that Menifee County was being billed a higher minimum demand than it was actually experiencing?

11. Refer to Menifee Exhibit No. 3 from the July 18, 2011 Informal Conference.

a. Explain the calculations that resulted in the amounts shown in the columns titled "Minimum Charged on 135 KW" and "Minimum Charge Based on 50 KW."

b. Provide this schedule in electronic format with all formulas unprotected and intact.

12. Since any additional service requests would have to be initiated by Menifee County or its agent, why were the billing elements, such as the minimum demand charge and any request for a change in rate schedule, not established during the initial service request?


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DATED **AUG 17 2011**

cc: Parties of record

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