

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 SECOND REQUEST FOR INFORMATION
TO MENIFEE COUNTY BOARD OF EDUCATION

Menifee County Board of Education ("Menifee County"), pursuant to 807 KAR 5:001, 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.

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 Menifee County's response to Item 9.a. of Commission Staff's First Request for Information ("Staff's First Request").

a. Provide further information in support of Menifee County's response to Item 9.a. shown in Exhibit B.

b. Provide the information in Menifee County's response to Item 9.a., shown in Exhibit B, in an electronic format with formulas intact and unprotected on a compact disc.

2. Refer to Menifee County's response to Item 9.c. of Staff's First Request. In Menifee County's response to Item 9.c., its Exhibit C, the actual demand and billed demand shown on Clark Energy Cooperative, Inc.'s ("Clark Energy") bill dated 02/05/2007 is 62,440.

a. Does this actual and billed demand accurately represent Menifee County's demand for this billing period? Explain.

b. If the answer to question 2.a. above is yes, is Schedule L-General Power Service ("Schedule L") an appropriate rate schedule for Menifee County? Explain.

3. Refer to Menifee County's response to Item 11 of Staff's First Request.

a. Provide the monthly Clark Energy bills to Menifee County that will support the analysis in Menifee County's response to Item 11.a., its Exhibit G.

b. Provide Menifee County's response to Item 11.a., its Exhibit G, in an electronic format with formulas intact and unprotected on a compact disc.

c. Menifee County's response to Item 11.a., Exhibit G, indicates a cost difference of \$20,115.05. The schedule provided at the informal conference, and identified in the July 28, 2011 informal conference memorandum as Menifee Exhibit #3, indicates a cost difference of \$20,116.16. Explain which schedule is the correct version.

d. In response to Item 11.b. of Staff's First Request, Menifee County indicated that the information requested had been e-mailed on August 30, 2011 to "psc.info@ky.gov" with the case reference. Provide the schedule submitted on August 30, 2011 in response to Item 11.b. of Staff's First Request in electronic format with all formulas unprotected and intact on a compact disc.

4. Provide any information pertaining to service upgrades that Menifee County has had, including single phase to three phase, the corresponding load, and dates of the upgrades, if any.

5. Refer to Clark Energy's response to Item 8 of Staff's First Request. Provide copies of the third-party reviews performed by The Trane Company and Energy Masters International.



Jeff Detouen
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Public Service Commission
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DATED NOV 09 2011

cc: Parties of Record

Case No. 2011-00076

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