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OCT 15 2018

PUBLIC SERVICE
COMMISSION

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

CASE NO. 2018-00310

In the matter of:

APPLICATION OF SHELBY ENERGY COOPERATIVE, INC.
FOR AUTHORIZATION OF CHANGES IN SERVICE
TERRITORY WITH BLUE GRASS ENERGY COOPERATIVE CORPORATION

**RESPONSE OF SHELBY ENERGY COOPERATIVE, INC.
TO COMMISSION STAFF'S FIRST REQUEST FOR
INFORMATION**

Comes now Shelby Energy Cooperative, Inc. ("Shelby Energy"), by counsel, and for their Response to Commission Staff's First Request for Information states as follows:

Request No. 1. Refer to the Application, paragraph 4, explain who requested the territorial change and why the change was requested.

Response: Shelby Energy was originally contacted by C & J Services, LLC, a subcontractor for Unity Towers, LLC, which is a business that leases private property for the purpose of installing cell towers, which are then leased to cellular service providers. Brian Richardson, staking technician for Shelby Energy determined that Blue Grass Energy's lines were closer and more convenient to the proposed location, and after conferring with Blue Grass Energy, Shelby Energy requested the territory change.

Request No. 2: Confirm that the Snook Property is currently within Shelby Energy's service territory.

Response: According to the Public Service Commission Territory Map, last modified June 6, 2016, the Snook property lies within the service territories of both Shelby Energy and

Blue Grass Energy, as the farm is divided by the Shelby-Spencer County line. However, the site of the cell tower where the requested service is to provided is within the territory of Shelby Energy. See attached Exhibit "A."

Request No. 3: State how many customers will be affected by the proposed boundary change.

Response: None. Shelby Energy does not currently have any customers within the proposed territory amendment area.

Request No. 4: State whether any customer will change their electric supplier as a result of this proposed boundary change.

a. State the impact this boundary change will have on any current customers' monthly bill.

b. State whether any current customers that will be impacted have received notice, and the manner in which the current customers receives such notice.

Response: No customers, either from Shelby Energy or Blue Grass Energy, will change their provider, as there are currently no customers within the proposed territory change. Therefore, there will be no impact on any customers' bills and no notices have been sent.

Request No. 5: State the amount and types of costs to be incurred by Bluegrass Energy Cooperative Corporation (Blue Grass Energy) upon assuming these services.

Response: Shelby Energy has no knowledge of the amount and types of costs to be incurred by Blue Grass Energy upon assuming these services. However, it is believed that Hon. Howard Downing, Counsel for Blue Grass Energy, has submitted these costs to the Commission.

Request No. 6: Provide the written contract between Shelby Energy and Blue Grass Energy that memorializes the agreement as to the change in certified territories.

Response: See attached Exhibit "B."

Request No. 7: Provide the quadrant (key) map showing the revised territorial line with a note referencing the property/customer and the date of the territorial agreement that has been signed by representatives of Shelby Energy and Blue Grass Energy.

Response: See attached Exhibit "A."

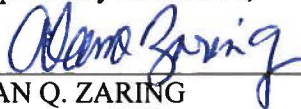
Request No. 8: Provide the site (plat) map showing the original and revised territorial boundary. The map must include coordinates accurate within three (3) meters for at least four (4) point on the territorial line. Include the beginning and ending points of the change. The map should be signed by representatives of Shelby Energy and Blue Grass Energy and should identify the area that will be transferred from Shelby Energy to Blue Grass Energy's service territory pursuant to the agreement as the area between four points designated on the maps as points A, B, C, and D, and marked with GPS coordinates.

Response: See attached Exhibit "A."

Request No. 9: State whether the proposed change in certified territories will require any new or amended franchises or permits.

Response: No, there will be no new or amended franchises or permits required as a result of the proposed change in territories.

Respectfully submitted,



ALAN Q. ZARING
ATTORNEY FOR SHELBY ENERGY COOPERATIVE, INC.
ZARING & SULLIVAN LAW OFFICE, PSC
P O BOX 226
NEW CASTLE, KY 40050
(502) 845-2222
alan.zaring@zsfirm.com

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing Application was mailed to the following on the 12 day of October, 2018, U.S. mail, postage prepaid:

Mr. Greg Harrington
Vice President, Engineering & Operations/COO
1201 Lexington Road
Nicholasville, KY 40340

Hon. Howard Downing
109 South First Street
Nicholasville, KY 40356



ALAN Q. ZARING
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Shelby Energy Cooperative

® A Touchstone Energy Cooperative 

July 17, 2018

Mr. Greg Harrington, Vice President, Engineering & Operations/COO
Blue Grass Energy
1201 Lexington Rd
Nicholasville, KY 40340

RE: Letter of Agreement – Snook Property off Lebanon Rd/Shelby County Parcel Id# 104-00-020

Dear Mr. Harrington:

This letter is to confirm that Shelby Energy Cooperative, Inc. is granting permission for Blue Grass Energy to serve the Snook Property located off Lebanon Rd/Shelby County Parcel Id# 104-00-020. This agreement is pursuant to KRS 278.018 (6). This contract meets the guidelines set forth in KRS 278.017 (3) in that Blue Grass Energy's existing distribution facilities are closer to this parcel, that Blue Grass Energy hereby confirms those facilities are adequate and capable of providing dependable, high quality service to this parcel, and that Blue Grass Energy's service to this parcel will avoid unnecessary duplication of distribution facilities.

Additionally, this agreement shall apply only to the address mentioned above. No other lots within the certified territory of Shelby Energy will be served by Blue Grass Energy unless an agreement is negotiated and approved in advance.

We appreciate you working with us in a cooperative manner to resolve this situation and stand ready to work with you on any future service issues. Feel free to contact me if you have any further questions or concerns.

Sincerely,

Brian Richardson

Staking Technician

502-437-8174

brian@shelbyenergy.com

www.shelbyenergy.com

620 Old Finchville Road · Shelbyville, Kentucky 40065-1714
Shelby Co. (502)633-4420 · Trimble Co. (502)255-3001 · 1-800-292-6585
Shelby Energy is an equal opportunity provider and employer.



Blue Grass Energy

Acknowledgement is hereby agreed to provide electric service to the Ollie & Roy Snook Property located off Lebanon Rd/Shelby County Parcel Id# 104-00-020


Blue Grass Energy

7.31.18
Date

Filing
CONTAINS
LARGE OR OVERSIZED
MAP(S)

RECEIVED ON:
(10/15/2018)