

RECEIVED

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION
CASE NO. 2018-00310

NOV 01 2018
PUBLIC SERVICE
COMMISSION

In the matter of:

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

**AMENDED 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 be provided is within the territory of Shelby Energy.

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: There are no current members in the proposed amended territory, so there are no costs involved. However, a prospective member has applied for service and, if accepted, the estimated costs as provided by Blue Grass Energy are as follows:

\$11,378.14 for the first 1000 feet, at no charge per the PSC tariff.

Construction cost for the additional 929 feet is \$4,342.25, to be paid by the member.

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: Previously provided with original Response.

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: Previously provided with original Response.

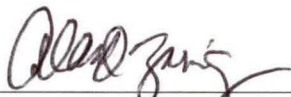
Request No. 8: Provide the site (plat) map showing the original and revised territorial boundary. The map must include coordinates accurate within three (3) meters for at least four (4) point on the territorial line. Include the beginning and ending points of the change. The map should be signed by representatives 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 Exhibit "A" to original Response.

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 30 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
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