

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 ROGER D. SHOCKLEE

Complainant Roger D. Shocklee, pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due on February 16, 2024. The Commission directs Mr. Shocklee 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 governmental agency, be accompanied by a signed certification of the preparer or the

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 mandated electronic filing, with exception to *pro se* formal complaints filed against utilities).

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.

Mr. Shocklee shall make timely amendment to any prior response if Mr. Shocklee 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 Mr. Shocklee fails or refuses to furnish all or part of the requested information, Mr. Shocklee 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, Mr. Shocklee 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 Kenergy Corp.'s (Kenergy's) Answer to Complaint, pages 8–10, paragraphs 45–46, which alleges that even if Mr. Shocklee were considered an eligible customer-generator, his applications should be denied under Kenergy's Tariff, Sheet 46C paragraph (1).

a. State whether Mr. Shocklee's applications sought to interconnect the proposed generating facilities to a radial distribution circuit.

b. State whether Mr. Shocklee's applications sought to interconnect proposed generating facilities that in aggregate with other customers, would exceed 15% of the line section's most recent one hour peak load.

c. State any reasons why Kenergy's Tariff, Sheet 46C paragraph (1) should not prohibit approval of Mr. Shocklee's applications.

d. Identify any factual allegations made in Kenergy's Answer to Complaint that Mr. Shocklee disputes.

2. Refer to Kenergy's Tariff, Sheet 46D paragraph (8), which states "No construction of facilities by Kenergy on its own system will be required to accommodate the generating facility." State any reasons why this tariff provision should not apply to Mr. Shocklee's proposed generating facilities.

3. State whether interconnection as proposed in Mr. Shocklee's applications is possible without causing an overload to any portion of the circuit to be used by the proposed generating facility.

4. State whether interconnection as proposed in Mr. Shocklee's applications is possible without hindering other customers' ability to maintain electric service.

5. Provide any documents used to respond to Items 1 through 4 above, including but not limited to, engineering reports or notes, photographs, maps, or correspondence.



Linda C. Bridwell, PE
Executive Director
Public Service Commission
P.O. Box 615
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DATED FEB 02 2024

cc: Parties of Record

Case No. 2023-00421

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