Teresa J. Hill, Secretary Environmental and Public Protection Cabinet

Christopher L. Lilly Commissioner Department of Public Protection

Kent W. Blake Director State Regulations and Rates Kentucky Utilities Company 220 W. Main Street P. O. Box 32010 Louisville, KY 40232-2010



Commonwealth of Kentucky
Public Service Commission

211 Sower Blvd. P.O. Box 615 Frankfort, Kentucky 40602-0615 Telephone: (502) 564-3940 Fax: (502) 564-3460 psc.ky.gov

November 13, 2006

Mark David Goss Chairman

> John W. Clay Commissioner

RE: Case No. 2006-00214

Please see enclosed data request from Commission Staff in the above case.

If you need further assistance, please contact my staff at (502) 564-3940.

Sincerely,

Beth O'Donnell Executive Director



Teresa J. Hill, Secretary Environmental and Public Protection Cabinet

Christopher L. Lilly Commissioner Department of Public Protection

Honorable Elizabeth L. Cocanougher Senior Corporate Attorney Kentucky Utilities Company c/o Louisville Gas & Electric Co. P. O. Box 32010 Louisville, KY 40232-2010



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Christopher L. Lilly Commissioner Department of Public Protection

Honorable J. Gregory Cornett Attorney at Law Stoll Keenon Ogden, PLLC 2000 PNC Plaza 500 W Jefferson Street Louisville, KY 40202-2828



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Christopher L. Lilly Commissioner Department of Public Protection

Honorable Howard Downing Attorney at Law 109 South First Street Nicholasville, KY 40356



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Christopher L. Lilly Commissioner Department of Public Protection

Honorable Allyson K. Sturgeon Attorney at Law E.ON U.S., LLC 220 West Main Street Louisville, KY 40202



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Kent W. Blake Director State Regulations and Rates Kentucky Utilities Company 220 W. Main Street P. O. Box 32010 Louisville, KY 40232-2010

Honorable Howard Downing Attorney at Law 109 South First Street Nicholasville, KY 40356 Honorable Elizabeth L. Cocanougher Senior Corporate Attorney Kentucky Utilities Company c/o Louisville Gas & Electric Co. P. O. Box 32010 Louisville, KY 40232-2010

Honorable Allyson K. Sturgeon Attorney at Law E.ON U.S., LLC 220 West Main Street Louisville, KY 40202 Honorable J. Gregory Cornett Attorney at Law Stoll Keenon Ogden, PLLC 2000 PNC Plaza 500 W Jefferson Street Louisville, KY 40202-2828

COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

In	the	Matt	er of	•

PETITION OF KENTUCKY UTILITIES)	
COMPANY AND BLUE GRASS ENERGY)	CASE NO.
COOPERATIVE CORPORATION TO BE)	2006-00214
DESIGNATED AS THE RETAIL ELECTRIC)	
SERVICE SUPPLIER FOR THE NEW WAL-)	
MART STORE NUMBER 591 LOCATED IN)	
CYNTHIANA, KENTUCKY)	

SECOND DATA REQUEST OF COMMISSION STAFF TO KENTUCKY UTILITIES COMPANY

Kentucky Utilities Company ("KU"), pursuant to Administrative Regulation 807 KAR 5:001, is to file with the Commission the original and 8 copies of the following information, with a copy to all parties of record. The information requested herein is due within 10 days of the date of this request. Each copy of the data requested should be placed in a bound volume with each item tabbed. When a number of sheets are required for an item, each sheet should be appropriately indexed, for example, Item 1(a), Sheet 2 of 6. Include with each response the name of the person who will be responsible for responding to questions relating to the information provided. Careful attention should be given to copied material to ensure that it is legible. Where information herein has been previously provided, in the format requested herein, reference may be made to the specific location of said information in responding to this information request.

- 1. Pursuant to KRS 278.018(6), describe with specificity how the allocation from KU to Blue Grass Energy Cooperative Corporation ("Blue Grass") of lots 6 and 7 in the Brannon Crossings development near Nicholasville, Kentucky and lots 1-88 in the residential development known as The Cottages of Alton Station in Anderson County, Kentucky, as identified in Article 1.02 of your proposed Settlement Agreement ("New Blue Grass Territory"), would promote the purposes of KRS 278.016 and provide adequate and reasonable service to all areas and consumers affected thereby.
- Provide the names, addresses, and telephone numbers of New Blue Grass Territory property owners.
- 3. Will any existing customer be reassigned to a different electric supplier as a result of the proposed territorial boundary changes? If so, identify with specificity such customers.
- 4. Do any of the New Blue Grass Territory property owners have residences, homes, or other buildings constructed on said property? If so, identify with specificity such property owners.
- 5. Have any of the New Blue Grass Territory property owners consented to or been consulted or notified of the possible change in utility provider? If so, describe with specificity such discussions, consent, consultation, or notice given, including the applicable dates.
- 6. Describe with specificity the reasons that KU and Blue Grass previously made territorial boundary changes involving certain of the New Blue Grass Territory in Commission Case No. 2006-00021 and are now again requesting to make similar territorial boundary changes in the instant case.

Beth O'Donnett

Executive Director

Public Service Commission

P.O. Box 615

Frankfort, KY 40602

DATED November 13, 2006

cc: All Parties

COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

PETITION OF KENTUCKY UTILITIES)	
COMPANY AND BLUE GRASS ENERGY)	CASE NO.
COOPERATIVE CORPORATION TO BE)	2006-00214
DESIGNATED AS THE RETAIL ELECTRIC)	
SERVICE SUPPLIER FOR THE NEW WAL-)	
MART STORE NUMBER 591 LOCATED IN)	
CYNTHIANA, KENTUCKY)	

SECOND DATA REQUEST OF COMMISSION STAFF TO BLUE GRASS ENERGY COOPERATIVE CORPORATION

Blue Grass Energy Cooperative Corporation ("Blue Grass"), pursuant to Administrative Regulation 807 KAR 5:001, is to file with the Commission the original and 8 copies of the following information, with a copy to all parties of record. The information requested herein is due within 10 days of the date of this request. Each copy of the data requested should be placed in a bound volume with each item tabbed. When a number of sheets are required for an item, each sheet should be appropriately indexed, for example, Item 1(a), Sheet 2 of 6. Include with each response the name of the person who will be responsible for responding to questions relating to the information provided. Careful attention should be given to copied material to ensure that it is legible. Where information herein has been previously provided, in the format requested herein, reference may be made to the specific location of said information in responding to this information request.

- 1. Pursuant to KRS 278.018(6), describe with specificity how the allocation from Kentucky Utilities Company ("KU") to Blue Grass of lots 6 and 7 in the Brannon Crossings development near Nicholasville, Kentucky and lots 1-88 in the residential development known as The Cottages of Alton Station in Anderson County, Kentucky, as identified in Article 1.02 of your proposed Settlement Agreement ("New Blue Grass Territory"), would promote the purposes of KRS 278.016 and provide adequate and reasonable service to all areas and consumers affected thereby.
- 2. Provide the names, addresses, and telephone numbers of New Blue Grass Territory property owners.
- 3. Will any existing customer be reassigned to a different electric supplier as a result of the proposed territorial boundary changes? If so, identify with specificity such customers.
- 4. Do any of the New Blue Grass Territory property owners have residences, homes, or other buildings constructed on said property? If so, identify with specificity such property owners.
- 5. Have any of the New Blue Grass Territory property owners consented to or been consulted or notified of the possible change in utility provider? If so, describe with specificity such discussions, consent, consultation, or notice given, including the applicable dates.
- 6. Describe with specificity the reasons that Blue Grass and KU previously made territorial boundary changes involving certain of the New Blue Grass Territory in Commission Case No. 2006-00021 and are now again requesting to make similar territorial boundary changes in the instant case.

Both O'Donnell

Executive Director

Public Service Commission

P.O. Box 615

Frankfort, KY 40602

DATED November 13, 2006

cc: All Parties