## COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

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APPLICATION OF SHELBY ENERGY	)	
COOPERATIVE, INC. TO PASS-THROUGH AN	)	CASE NO.
INCREASE OF ITS WHOLESALE POWER	)	2008-00423
SUPPLIER PURSUANT TO KRS 278.455(2)	)	

## SECOND DATA REQUEST OF COMMISSION STAFF TO SHELBY ENERGY COOPERATIVE, INC.

Shelby Energy Cooperative, Inc. ("Shelby"), pursuant to 807 KAR 5:001, is to file with the Commission the original and five copies of the following information, with a copy to all parties of record. The information requested herein is due on or before March 24, 2009. 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 the 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.

Shelby 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 requests to which Shelby fails or refuses to furnish all or part of the requested information, Shelby shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall 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. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations.

- 1. Provide the workpapers, spreadsheets, etc. that show the calculation of the increase, by individual wholesale rate schedule, in Shelby's cost of power from East Kentucky Power Cooperative, Inc. ("EKPC") that Shelby proposes to flow through to its customers based on the rates contained in the March 13, 2009 Settlement Agreement filed by EKPC in Case No. 2008-00409 ("Settlement Agreement").
- 2. Provide the proof of revenues for the increase in rates that Shelby proposes to implement to recover the increased wholesale power costs it will incur as a result of the Settlement Agreement.
- 3. Provide analyses which demonstrate the increase has been allocated on a proportional basis to each class and within each tariff, in a manner that does not change Shelby's rate design. The analyses are to be provided in both paper copy and electronic Excel format with all formulas intact.

<sup>&</sup>lt;sup>1</sup> Case No. 2008-00409, General Adjustment of Electric Rates of East Kentucky Power Cooperative, Inc. (Ky. PSC, filed Oct. 31, 2008).

4. Provide a statement showing, by cross-outs and italicized inserts, all proposed changes in rates. A copy of the current tariff may be used.

Jeff Derouen

Executive Director

**Public Service Commission** 

P.O. Box 615

Frankfort, KY 40602

DATED: MARCH 18, 2009

cc: All Parties

Debbie Martin President and CEO Shelby Energy Cooperative, Inc. 620 Old Finchville Road Shelbyville, KY 40065

Honorable Donald T Prather Attorney At Law Mathis, Riggs & Prather, P.S.C. Attorneys at Law P. O. Box 1059 500 Main Street, Suite 5 Shelbyville, KY 40066-1059