

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF SHELBY ENERGY)	
COOPERATIVE, INC. FOR AUTHORIZATION OF)	CASE NO.
CHANGES IN SERVICE TERRITORY WITH BLUE)	2019-00263
GRASS ENERGY COOPERATIVE CORPORATION)	

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

Shelby Energy Cooperative, Inc. (Shelby Energy), pursuant to 807 KAR 5:001, is to file with the Commission the original and three copies of the following information, with a copy to all parties of record. The information requested herein is due on or before October 27, 2019. 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 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 Energy 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

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

Careful attention should 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. When filing a paper containing personal information, Shelby Energy shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. In the July 24, 2019 cover letter filed by Shelby Energy with its application, Shelby Energy states that it has enclosed two oversized maps plus a regular size map with its application. In paragraph 12 of Shelby Energy's application, Shelby Energy identifies Exhibit 3 of the application as a map illustrating the amended certified service territory boundary lines. Exhibit 3 is titled "Samples Ln Territory Map Amendment Shelby Energy Cooperative Release to Blue Grass Energy." The map includes a Note that states, "GPS points are where Blue Grass Energy will serve based upon the written contract between Shelby Energy and Blue Grass Energy dated May 23, 2019." Exhibit 3 identifies ten GPS points. All of the filed maps appear to be copies of Exhibit 3. Consequently, all of the requests for revision apply to all of the maps filed with the application.

a. Refer to Exhibit 3. The GPS points on Exhibit 3 for #8 and #9 appear to have two overlapping circles. Each GPS coordinate should have one circle. Revise Exhibit 3 so that each GPS coordinate only has one circle.

b. Refer to paragraph 12 of Shelby Energy's application. Contrary to the statement of Shelby Energy in paragraph 12 of its application that Exhibit 3 has been signed by entities of both cooperatives, the regular size map is not signed or dated. One oversized map is signed and dated, and one is not. Provide maps that have been signed and dated by Shelby Energy and Blue Grass Energy.

c. Revise the Note on Exhibit 3 to read as follows, "GPS points define the revised boundary between Shelby Energy and Blue Grass Energy." Then draw a boundary line on the map connecting all of the GPS points and label the area enclosed by the new boundary as "Transferred to Blue Grass Energy Territory."

d. File three paper copies of the revised oversized map for Exhibit 3.

2. Refer to paragraph 12 of Shelby Energy's application. In paragraph 12, Shelby Energy makes the following statement, "Said map includes coordinates accurate within three meters, for at least four points (marked 'A,' 'B,' 'C,' and 'D,' and marked with GPS coordinates)." Refer to Exhibit 3 of Shelby Energy's application. The GPS coordinates on Exhibit 3 are marked with numbers as opposed to letters. Provide an explanation as to why paragraph 12 of Shelby Energy's application does not read as follows, "Said map includes coordinates accurate within three meters, for at least four points (marked "1," "2," "3," and "4," and marked with GPS coordinates)."

3. Refer to Exhibit 1 of Shelby Energy's application. Exhibit 1 is the Agreement for Territory Change entered into by Shelby Energy and Blue Grass Energy on May 23,

2019. Exhibit 1 refers to an Exhibit "A" and an Exhibit "1" that should be attached. Copies of these Exhibits were not provided. Provide a copy of each Exhibit.

4. The Commission's electric service area paper map files are organized by 1:24,000 United States Geologic Survey quadrangle name. The area of the boundary change is on two quadrangles: Waddy and Glensboro. The current territory maps on file at the Commission for Waddy and Glensboro were signed and dated in 1982. These maps are available as portable document format (PDF) files upon request to the Commission.

a. Using the territory maps on file with the Commission as base maps, sketch the new boundary on the maps; label the maps with the current case number; and have the maps signed and dated by both cooperatives.

b. File two paper copies of the revised Waddy map. File two paper copies of the revised Glensboro map.



Gwen R. Pinson
Executive Director
Public Service Commission
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DATED OCT 07 2019

cc: Parties of Record

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