

OCT 28 2019

PUBLIC SERVICE
COMMISSIONCOMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

CASE NO. 2019-00263

In the matter of:

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

Response: See attached, as revised.

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.

Response: See attached, as revised.

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."

Response: See attached, as revised.

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

Response: See attached, as revised.

Request No. 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)."

Response: The reference to the GPS coordinates being marked with letters as opposed to numbers was in error. Said map includes coordinates accurate within three meters, for at least four points (marked "1," "2," "3," and "4," and marked with GPS coordinates).

Request No. 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, -3- Case No. 2019-00263 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.

Response: See attached. There is only one Exhibit, labeled Exhibit "A," that should have been attached to the aforesaid Agreement. That document is attached hereto as "Exhibit A to Exhibit 1." The reference to Exhibit "1" in the Agreement for Territory Change was in error and should have been Exhibit "A" throughout.

Request No. 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.

Response: See attached.

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

Response: See attached.

CERTIFICATION OF ACCURACY

The undersigned is counsel for Shelby Energy Cooperative, Inc. and is the preparer of this Response of Shelby Energy Cooperative, Inc. to Commission Staff's First Request for Information. These responses are true and accurate to the best of his knowledge, information, and belief formed after a reasonably inquiry.



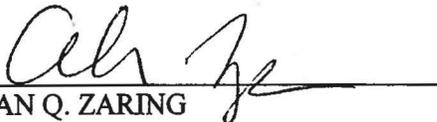
ALAN Q. ZARING
ATTORNEY FOR SHELBY ENERGY COOPERATIVE, INC.
ZARING & SULLIVAN LAW OFFICE, PSC
P O BOX 226
NEW CASTLE, KY 40050
(502) 845-2222
alan.zaring@zsfirm.com

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing Application was mailed to the following on the 28th day of October, 2019, U.S. mail, postage prepaid:

Mr. Greg Harrington
Vice President, Engineering & Operations/COO
Blue Grass Energy
1201 Lexington Road
Nicholasville, KY 40340

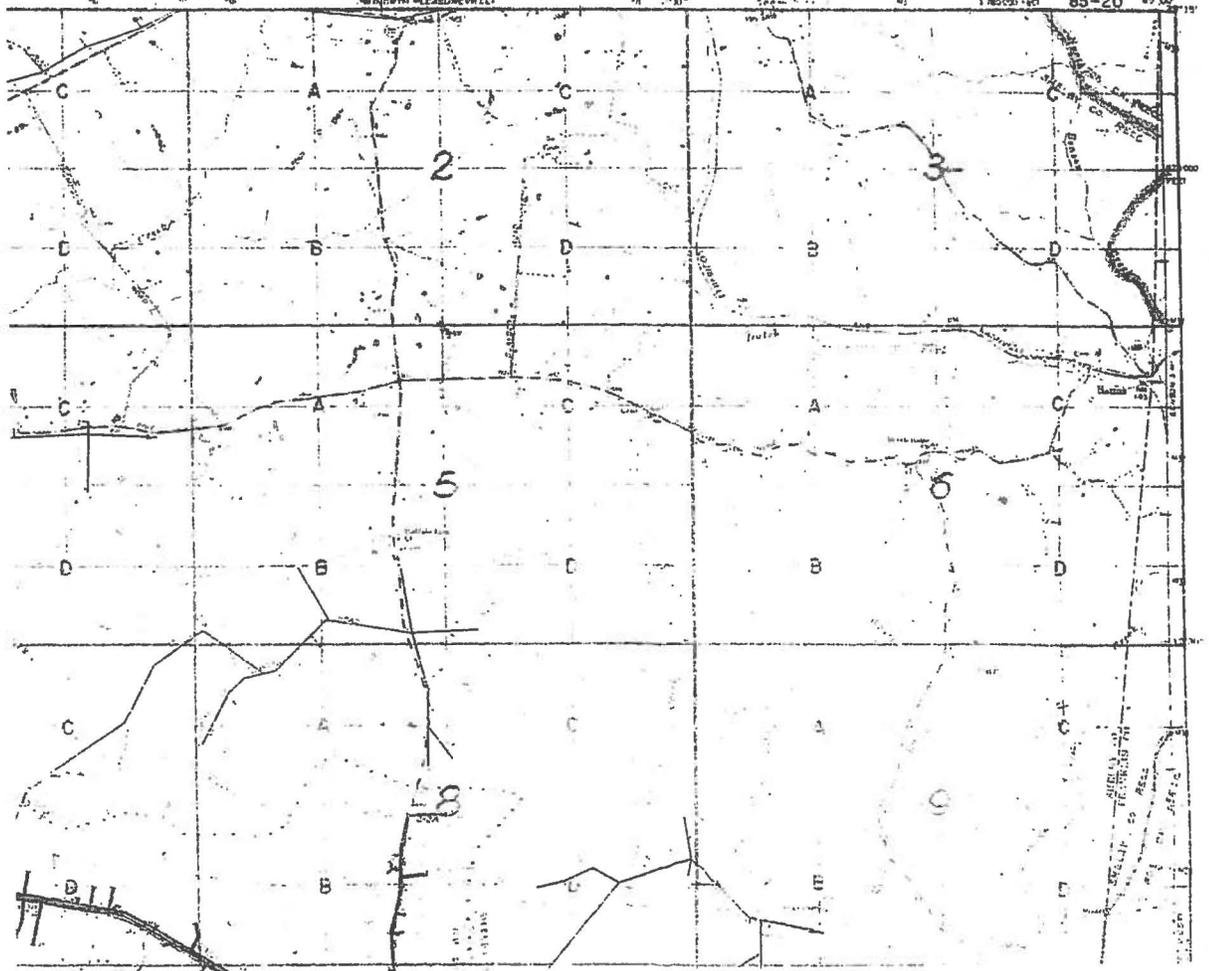
Hon. Howard Downing
109 South First Street
Nicholasville, KY 40356

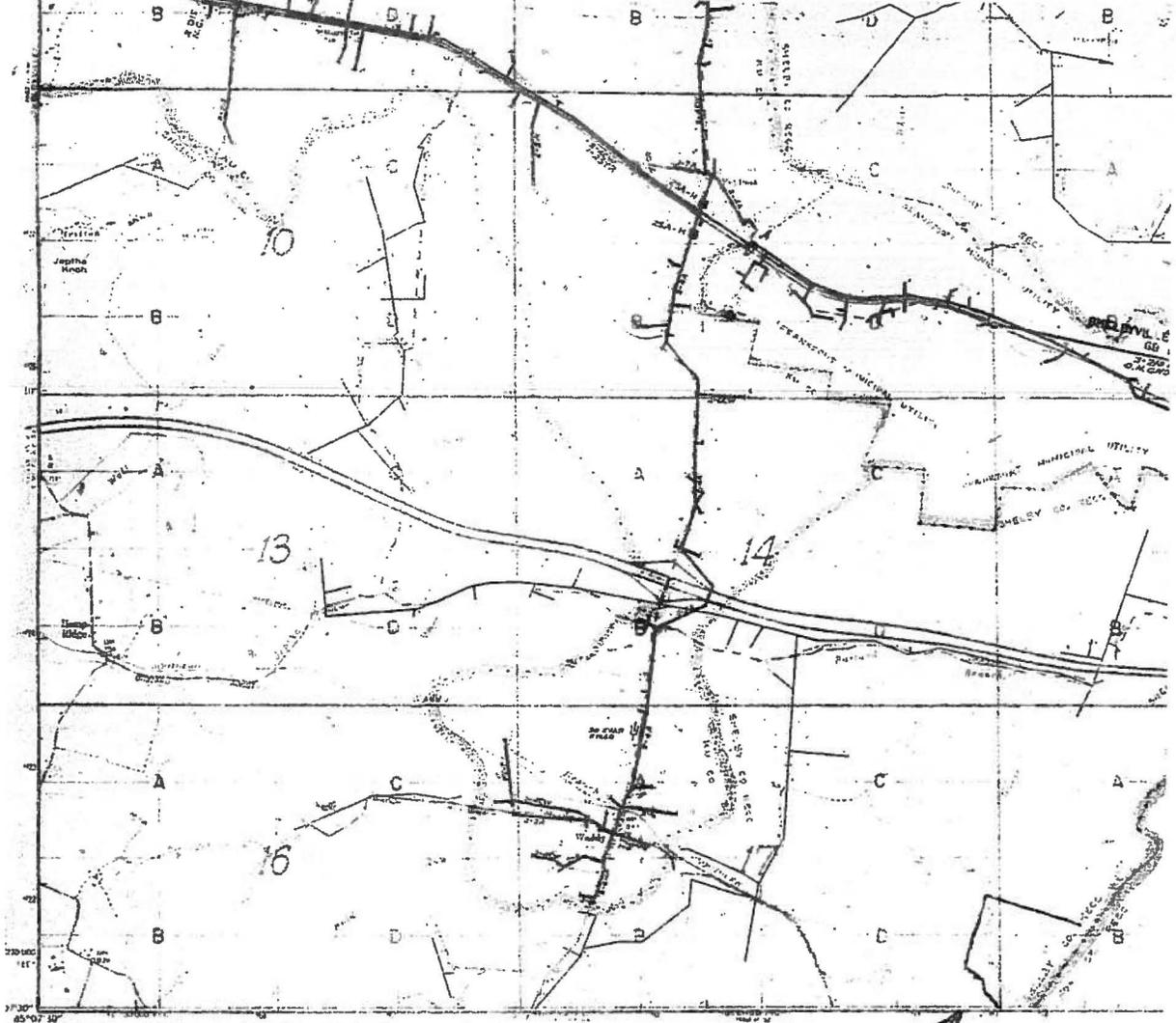


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alan.zaring@zsfirm.com

STATE OF KENTUCKY
KENTUCKY GEOLOGICAL SURVEY
UNIVERSITY OF KENTUCKY
AND THE STATE OF MISSISSIPPI
NORTH CAROLINA

WADSWORTH
7.5 MINUTE SERIES (TOPOGRAPHIC)
REVISION OF 1905
1:62,500 (1:62,500)
85-20





ELECTRIC SERVICE AREAS - 1972		
OTHER DISTRIBUTION NEAR BOUNDARY LINE	UTILITIES INVOLVED K.U. CO.	SIGNED BY <i>[Signature]</i>
K.U. CO. DISTRIBUTION NEAR BOUNDARY LINE	SHELBY RECC FOX CREEK RECC	<i>[Signature]</i>
BOUNDARY LINE		
PUBLIC SERVICE COMMISSION OF KENTUCKY CERTIFIED BY		

COMPLETION OF
TERRITORY CHANGE

W.E. Johnson 9-20-82
Territorial Maps
Reconfirmed By Perites
1982

PUBLIC
AS TO
DATE

Rod St
Shelby Energy
10-24-19

CASE NO. 2019-00263

2
TC
BLU
10/25

COORDINATES

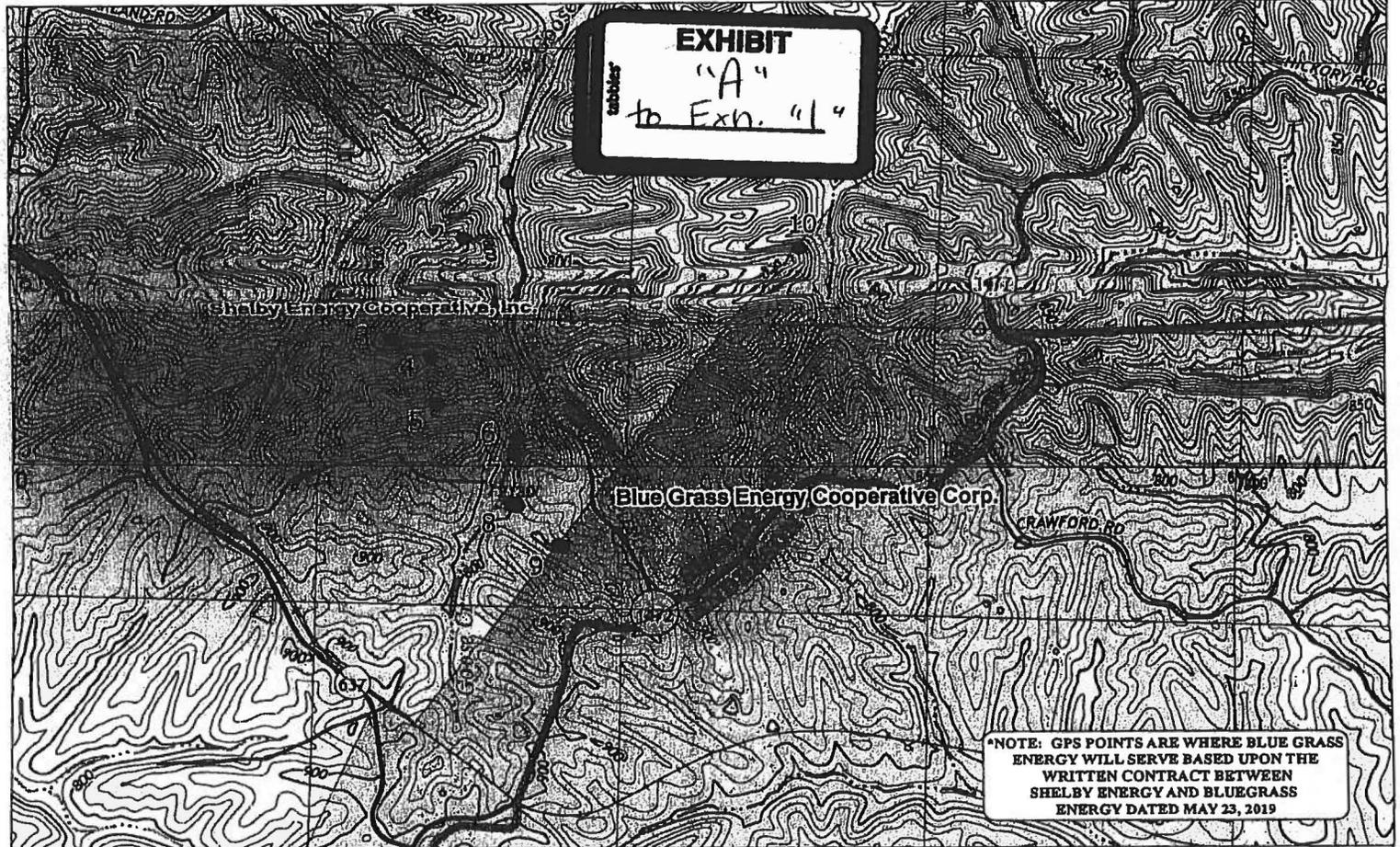
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- 2: -85.043800, 38.132312
- 3: -85.046507, 38.128827
- 4: -85.045053, 38.128299
- 5: -85.044805, 38.126819
- 6: -85.041766, 38.125747
- 7: -85.041935, 38.125311
- 8: -85.041954, 38.123726
- 9: -85.040207, 38.122439
- 10: -85.031288, 38.131052

Credits:

KY DOT
 Shelby County PVA
 Shelby Energy Cooperative
 USGS

COOPERATIVE SERVICE AREAS

-  Blue Grass Energy Cooperative Corp.
-  Shelby Energy Cooperative, Inc.
-  Roads



***NOTE: GPS POINTS ARE WHERE BLUE GRASS ENERGY WILL SERVE BASED UPON THE WRITTEN CONTRACT BETWEEN SHELBY ENERGY AND BLUEGRASS ENERGY DATED MAY 23, 2019**

**Samples Ln
 Territory Map Amendment**

Shelby Energy Cooperative release to Blue Grass Energy



A Touchstone Energy Cooperative



Date: 8-23-2018

Drawn By: Brian Richardson

Shelby Energy Representative:

Blue Grass Energy Representative:

RJH
Shelby Energy
10-24-19

Thy Hunter
BLUE GRASS ENERGY
10-24-19

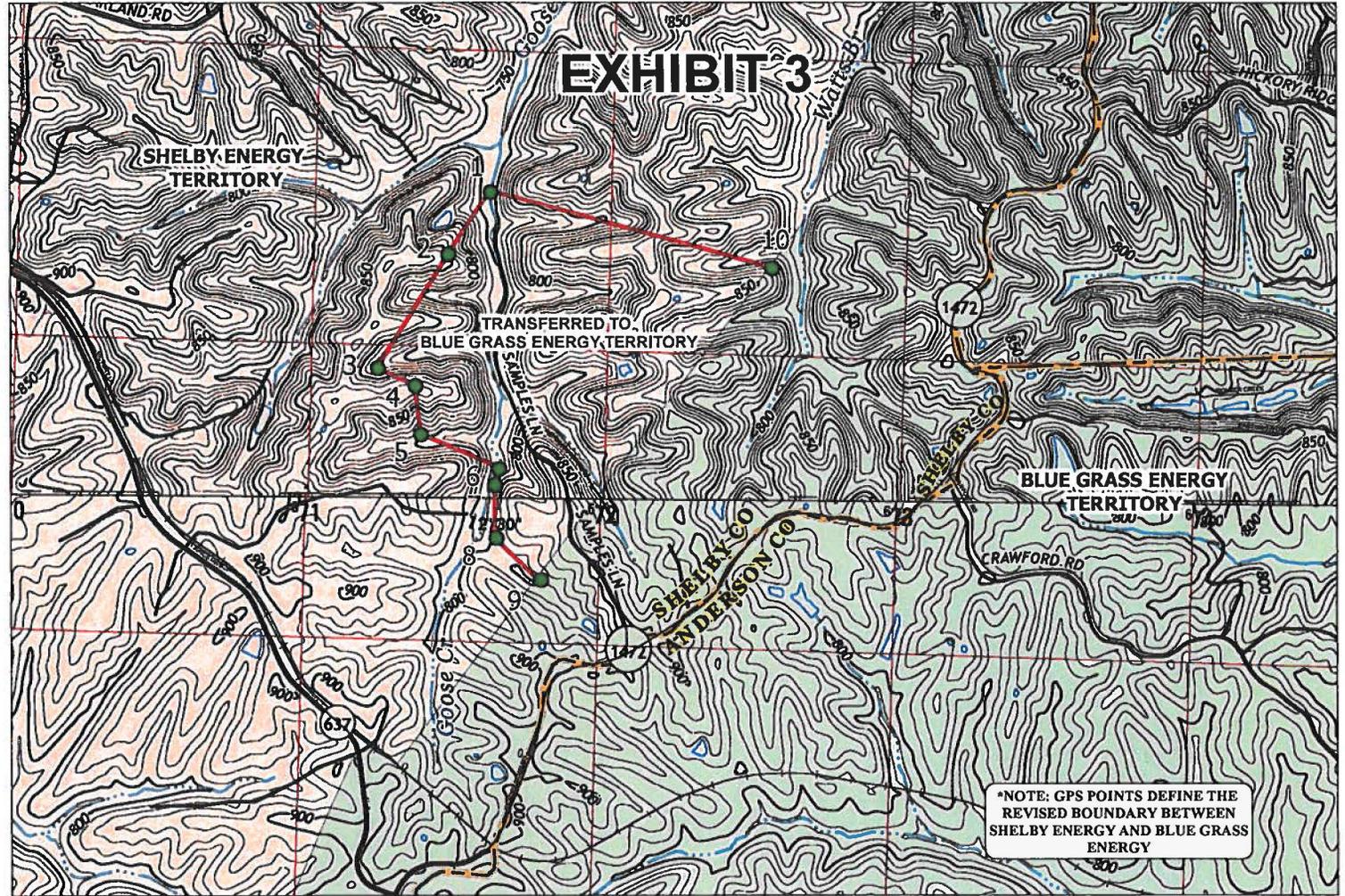
COORDINATES

- 1: -85.042126, 38.134200
- 2: -85.043800, 38.132312
- 3: -85.046507, 38.128827
- 4: -85.045053, 38.128299
- 5: -85.044805, 38.126819
- 6: -85.041766, 38.125747
- 7: -85.041935, 38.125311
- 8: -85.041954, 38.123726
- 9: -85.040207, 38.122439
- 10: -85.031288, 38.131952

Credits:

KY DOT
Shelby County PVA
Shelby Energy Cooperative
USGS

COOPERATIVE SERVICE AREAS
 Blue Grass Energy Cooperative Corp.
 Shelby Energy Cooperative, Inc.
 Roads



**Samples Ln
Territory Map Amendment**
Shelby Energy Cooperative release to Blue Grass Energy



A Touchstone Energy Cooperative



Date: 5-23-2019

Drawn By: Brian Richardson

Shelby Energy Representative:

Blue Grass Energy Representative:

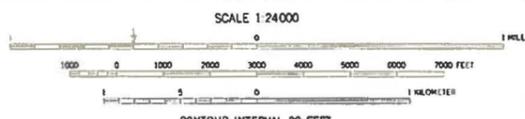
Jay Huff
 BLUE GRASS ENERGY
 10-24-19

R & J
 Shelby Energy
 10-24-19

CASE NO. 2019-00263
 BEGINNING OF TERRITORY CHANGE
 ON SAMPLES LN TO
 CONTINUE ON NEXT DOCUMENT



Mapped, edited, and published by the Geological Survey
 Control by USGS and USC&GS
 Topography from aerial photographs by multiplex methods
 Aerial photographs taken 1952. Field check 1954
 Polyconic projection. 1927 North American datum
 10,000-foot grid based on Kentucky coordinate system,
 north zone
 Unchecked elevations are shown in brown

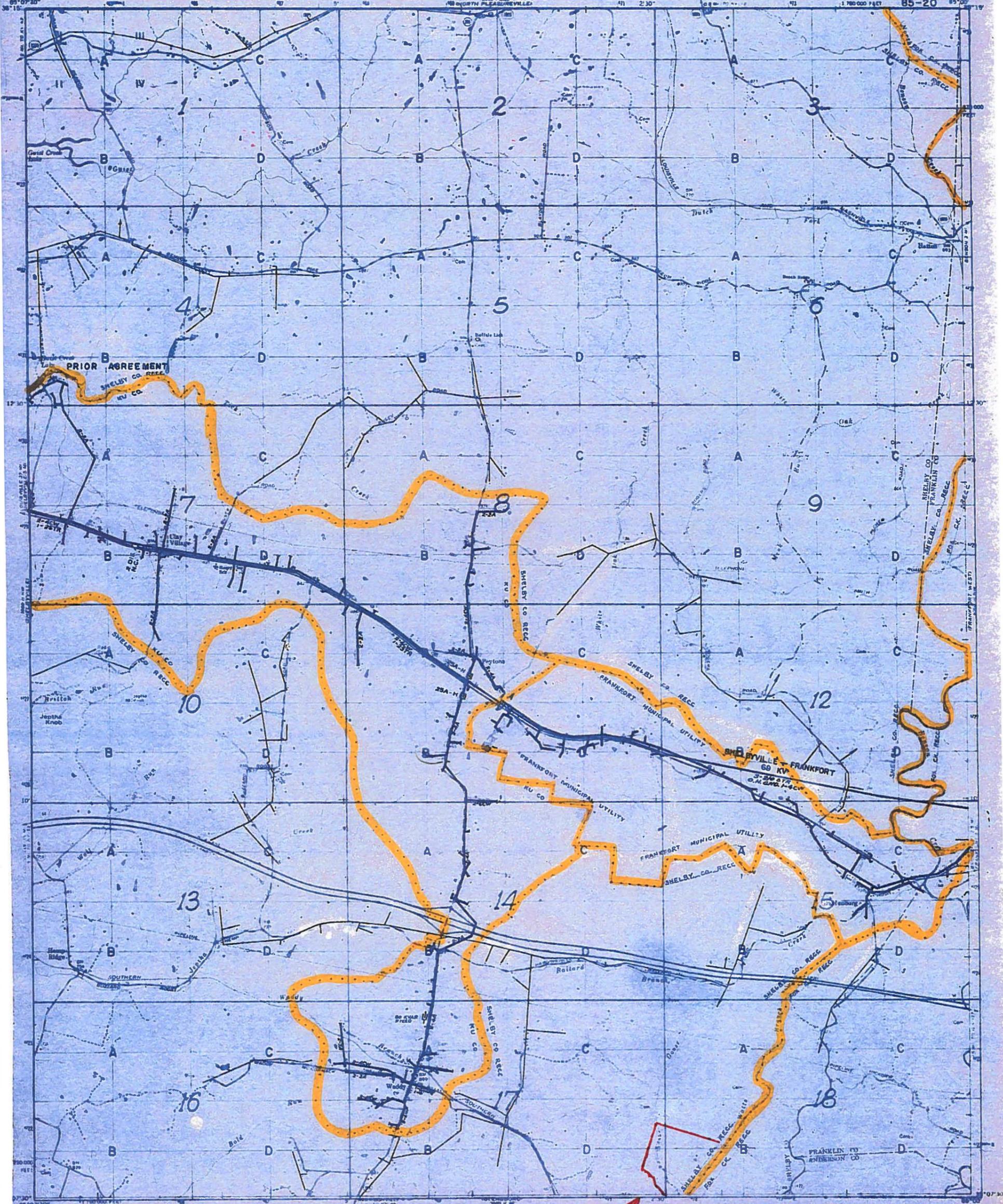


CONTOUR INTERVAL 20 FEET
 DATUM IS MEAN SEA LEVEL
UTILITY TERRITORIAL BOUNDARY ——— UTB ———
 THIS MAP COMPLES WITH NATIONAL MAP ACCURACY STANDARDS
 FOR SALE BY U. S. GEOLOGICAL SURVEY, WASHINGTON 25, D. C.
 AND KENTUCKY AGRICULTURAL AND INDUSTRIAL DEVELOPMENT BOARD, FRANKFORT, KENTUCKY
 A FOLDER DESCRIBING TOPOGRAPHIC MAPS AND SYMBOLS IS AVAILABLE ON REQUEST

ROAD CLASSIFICATION PUBLIC SERVICE COMMISSION APPROVED
 Heavy-duty ——— Light-duty ———
 Medium-duty ——— Unimproved ———
 U. S. Route State Route

ELECTRIC UTILITY COMPANY TERRITORIAL BOUNDARY LINES		
Company	Approved By	Date
Shelby RECC	<i>James R. Huff</i>	10/27/19
Fox Creek RECC	<i>Charles & Joseph</i>	10/27/19

GLENSBORO, KY.
 7 1/4 MOUNT EDDEN 15' QUADRANGLE
 N 3800-W 8500/7.5
 1954
 28-E-4



ELECTRIC SERVICE AREAS - 1972		
OTHER DISTRIBUTION NEAR BOUNDARY LINE	UTILITIES INVOLVED	SIGNED BY
K.U. CO. DISTRIBUTION NEAR BOUNDARY LINE	K.U. CO.	<i>J. H. Baker</i>
BOUNDARY LINE	SHELBY RECC.	<i>James Barber</i>
	FOX CREEK RECC.	<i>Rayford Barber</i>
PUBLIC SERVICE COMMISSION OF KENTUCKY CERTIFIED BY		

COMPLETION OF
TERRITORY CHANGE

W. E. Johnson 9-20-72
Territorial Maps
Reconfirmed By Parties
1982

PUBLIC SERVICE COMMISSION APPROVED
AS TO AREA CERTIFICATION BOUNDARY LINES
Date *9/6/82* Approved *ROA*
COMPLETED 2-27-70

28-E-2

Red St

CASE NO. 2019-00263

Jay Hunter