

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

RUSTY AND TERESA MULLINS)	
)	
COMPLAINANTS)	
)	
v.)	CASE NO. 2002-00176
)	
LICKING VALLEY RURAL ELECTRIC COOPERATIVE CORPORATION)	
)	
DEFENDANT)	

FIRST DATA REQUEST OF COMMISSION STAFF
TO LICKING VALLEY RURAL ELECTRIC COOPERATIVE CORPORATION

Pursuant to Administrative Regulation 807 KAR 5:001, Commission Staff requests that Licking Valley Rural Electric Cooperative Corporation (Licking Valley) file the original and four copies of the following information within 10 days of the date of this request, with a copy to all parties of record. Each copy of the information 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 witness who will be responsible for responding to questions relating to the information provided. Careful attention should be given to copied material to ensure its legibility.

1. Referring to Item #1 of Licking Valley's Answer (Answer) to the Commission's May 31, 2002 Order to Satisfy or Answer, respond to the following:

a. Explain Licking Valley's function, purpose, and use of the Electric Connect Order provided as Exhibit A to the Answer.

b. Refer to the upper right side of the Electric Connect Order where a record indicates whether the order was taken by phone or in Licking Valley's office and state what was originally noted for this item and why it appears to have been modified.

c. On the right side of the Electric Connect Order, middle of the page, is a place to indicate if the structure in question is a primary residence. State what was originally noted for this item and explain why it appears to have been changed.

d. Item #1 states that Licking Valley denies that Complainants have made any request for an extension of a distribution line to a house. In light of this statement, explain why the Electric Connect Order states this was new service to a house/cabin.

e. The supporting cost data attached to the Electric Connect Order indicates that the footage used in the pricing was reduced by 300 feet. Explain the reason(s) for this reduction.

f. Because the Electric Connect Order indicates that the new service is to a house/cabin, explain why Licking Valley did not reduce by 1,000 feet, pursuant to its tariff, the footage used in the pricing of the extension of distribution lines.

2. Referring Item #2 of the Answer, explain why the Answer references the provision of 807 KAR 5:041, Section 12, which applies to mobile homes, when the Electric Connect Order indicates that the extension is to a house/cabin.

3. Refer to Item #4 in the Answer. Has Licking Valley offered customers the opportunity to enter into a monthly payment plan for the customer's cost of an extension of service?

a. If yes, provide a detailed explanation of the payment plan alternative.

b. If no, explain why such an alternative is not available.

4. Referring to Item #5 in the Answer, respond to the following:

a. Provide the citation to the applicable statute and/or regulation that requires a customer to apply for and obtain a sewer permit as a condition to receiving electricity service.

b. Does Licking Valley review every application for an extension of service to determine that the customer has applied for and obtained a sewer permit?

(1) If yes, describe the process Licking Valley utilizes to perform such a review.

(2) If no, explain in detail the circumstances that exist when Licking Valley undertakes such a review.

5. Referring to Item #6 in the Answer, respond to the following:

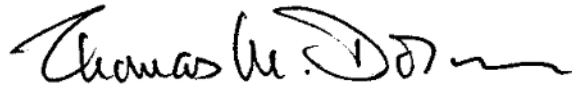
a. Explain how and when Licking Valley determined that the cabin was unoccupied and unwired.

b. Explain how the photographs contained in Exhibit B to the Answer demonstrate that the structure is not a primary residence and that the Complainants are not occupying the structure.

c. Explain in detail whether the photographs in Exhibit B were taken in conjunction with the preparation of the Electric Connect Order or Licking Valley's Answer.

6. Provide any documents that Licking Valley has received from Complainants.

7. Provide a breakdown showing how the \$2.53 cost-per-foot was determined.



Thomas M. Dorman
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Public Service Commission
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DATED: July 10, 2002

cc: Parties of Record