COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF BLUE GRASS ENERGY COOPERATIVE CORPORATION FOR A CERTIFICATE OF CONVENIENCE AND NECESSITY FOR ITS 2004-2005 CONSTRUCTION WORK PLAN

)) CASE NO.) 2004-00251)

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

Blue Grass Energy Cooperative Corporation ("Blue Grass"), pursuant to 807 KAR 5:001, is requested to file with the Commission the original and 5 copies of the following information, with a copy to all parties of record. The information requested herein is due no later than 20 days from 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. Refer to the line conversions, which have a "RUS CODE" of 336-26 and 385-34. Explain whether a conversion from 8 A CWC to Vee-phase 1/0 ACSR was

considered instead of the proposed Vee-phase # 2 ACSR. Would the additional cost justify the additional capacity gain from 1/0 ACSR? Explain.

2. Refer to the Automated Meter Reading ("AMR") program.

a. Provide a copy of the feasibility study, which justified the AMR program at an estimated cost of \$7,400,000.

b. List the functions that each meter can perform.

3. Refer to "Blue Grass Energy CWP: III-B Page 2." You stated, "The projected Model was analyzed for Design Criteria violations using an [sic] balanced voltage drop calculation."

a. Explain how it was determined that all your 3 Phase lines are balanced.

b. Would it be more accurate to analyze the system based on unbalanced voltage drop calculations? Explain.

4. Provide two copies of the following unbalanced voltage drop studies based on:

a. Existing loads using existing system circuitry.

b. Projected peak loads using existing system circuitry.

c. Projected peak loads using proposed system circuitry.

5. Has Blue Grass compared actual measured voltage and the calculated voltage to determine the accuracy of the voltage drop studies?

a. If yes, provide the voltage reading and indicate the substation, line section, and date on which each reading was taken. If the actual reading differs from the calculated voltage by more than two volts, explain the reason for the difference.

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b. If no, explain why a comparison is not necessary.

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Beth O'Donnell Executive Director Public Service Commission P. O. Box 615 Frankfort, Kentucky 40602

DATED <u>September 20, 2004</u>

cc: All Parties