

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

HAROLD BARKER,	)	
ANN BARKER, and	)	
BROOKS BARKER	)	
	)	
COMPLAINANTS	)	CASE NO.
	)	2013-00291
V.	)	
	)	
EAST KENTUCKY POWER COOPERATIVE,	)	
INC.	)	
	)	
DEFENDANT	)	

COMMISSION STAFF'S INITIAL REQUEST FOR INFORMATION  
TO EAST KENTUCKY POWER COOPERATIVE, INC.

East Kentucky Power Cooperative, Inc. ("EKPC"), pursuant to 807 KAR 5:001, is to file with the Commission the original and eight copies of the following information, with a copy to all parties of record. The information requested herein is due 14 days after the date of this request. 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.

EKPC 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 request to which EKPC 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 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.

1. Refer to EKPC's Answer to Complaint at page 3, paragraph 4.
  - a. Confirm that the first stated deviation resulted in the construction of an additional 8,000 feet of 345-kV/69-kV transmission line, as compared to the preexisting 69-kV transmission line.
  - b. State the additional cost of the 8,000-foot centerline deviation.
  - c. Explain the specific rationale for the 8,000-foot centerline deviation.
  - d. Confirm that the total length of the new centerline section is 13,200 feet.
2. Explain why the 8,000-foot deviation was not disclosed in EKPC's October 7, 2005, request for a staff opinion.
3. Identify when EKPC became aware that the bypass of the existing Hunt substation would require a separate and new centerline of 8,000 feet.

4. Explain why EKPC did not request a certificate of public convenience and necessity when it learned that the relocation of one segment of the separate and new centerline would require an extension of 8,000 feet.

5. State how the amount of the \$37,800 initial offer for the additional easement over the Barker property was determined.

6. Refer to EKPC's Answer to the Complaint at page 6, paragraph 13.

a. Describe the Barker's request regarding the placement of one of the pole structures and the actual alterations made as a result of the request.

b. Provide any written or other documentation regarding the Barker's request for alteration of the placement of the subject pole structure.

c. State whether any other request regarding placement of the transmission line or poles was received from the Barkers prior to the transmission line's upgrade.

d. Provide the records documenting the Barker's attendance at the November 2005 open house.

7. State whether EKPC received any requests from other individuals to alter the placement of the upgraded transmission line, identify any such requests, and state whether EKPC consented to or denied those requests.

*Jason D. Derouen for*  
\_\_\_\_\_  
Jeff Derouen  
Executive Director  
Public Service Commission  
P. O. Box 615  
Frankfort, Kentucky 40602

DATED NOV 07 2013

cc: Parties of Record

Case No. 2013-00291

Harold, Ann & Brooks Barker  
5450 Mt. Sterling Road  
Winchester, KENTUCKY 40391

Anthony S Campbell  
President & CEO  
East Kentucky Power Cooperative, Inc.  
4775 Lexington Road  
P. O. Box 707  
Winchester, KY 40392-0707

Alex Rowady  
212 South Maple Street  
Winchester, KENTUCKY 40391

David S Samford  
Goss Samford, PLLC  
2365 Harrodsburg Road, Suite B325  
Lexington, KENTUCKY 40504