

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

THE APPLICATION OF SHELBY ENERGY)
COOPERATIVE, INC. FOR AUTHORIZATION OF)
CHANGES IN SERVICE TERRITORY WITH KENTUCKY) NO. 2014-00224
UTILITIES COMPANY, SPECIFICALLY OLD MILL)
VILLAGE AND ROLLING RIDGE SUBDIVISIONS)

RESPONSES TO COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
AND PRODUCTION OF DOCUMENTS TO SHELBY ENERGY COOPERATIVE, INC.

Comes Shelby Energy Cooperative, Inc. ("Shelby Energy"), by counsel, and respectfully submits the following Responses to the Commission Staff's Initial Request for Information and Production of Documents to Shelby Energy Cooperative, Inc.

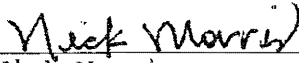
Respectfully submitted,

MATHIS, RIGGS, PRATHER & RATLIFF, P.S.C.

By 

Donald T. Prather
500 Main Street, Suite 5
Shelbyville, Kentucky 40065
Phone: (502) 633-5220
Fax: (502) 633-0667

I, the undersigned Nick Morris, being the Manager of Engineering at Shelby Energy, certify that the Responses contained herein are true and accurate to the best of my knowledge, information and belief formed after a reasonable inquiry.


Nick Morris

09-23-14
Date

1. Refer to Exhibit 2 to the Application. The current electric service territory boundary for the Old Mill Village/Glenview area as depicted on Exhibit 2 does not match the current electric service territory boundary for the Old Mill Village/Glenview area as depicted on the certified territory map for the Shelbyville Quadrangle ("Shelbyville Map") that was certified by the Commission in Case No. 1990-00047¹ and signed by representatives of Shelby Energy and Kentucky Utilities Company ("KU") on July 3, 1990. The Shelbyville Map has a notation "Refer to Agreement dated 2-12-76 Glenview Estates Subd" ("2-12-76 Agreement").

a. State whether the discrepancy between Exhibit 2 and the Shelbyville Map arises from the 2-12-76 Agreement.

b. If the discrepancy does not arise from the 2-12-76 Agreement, explain the discrepancy between Exhibit 2 and the Shelbyville Map.

c. Submit a copy of the 2-12-76 Agreement and any maps or exhibits that were attached to the Agreement.

d. Was the 2-12-76 Agreement filed previously with the Commission as part of a formal proceeding? If so, provide the case number and case style of that proceeding.

Response 1a: Shelby Energy has no knowledge regarding the 2-12-76 Agreement, therefore, Shelby Energy has no knowledge whether any discrepancy between Exhibit 2 to the Application and the Shelbyville Map has anything to do with the 2-12-76 Agreement.

¹ Case No. 1990-00047, Application of Kentucky Utilities Company for Authorization of Change in Territory with Rural Electric Cooperative Corporations (Ky. PSC May 25, 1990).

Response 1b: Shelby Energy cannot explain any discrepancy between Exhibit 2, which depicts the current territory boundary acknowledged by KU and Shelby Energy, and the Shelbyville Map.

Response 1c: Shelby Energy does not have a copy of the 2-12-76 Agreement or any maps or exhibits that may have been attached to it.

Response 1d: Shelby Energy has no knowledge whether the 2-12-76 Agreement was previously filed with the Commission, whether as part of a formal proceeding or informally.

Responsible Witness:

Nick Morris

2. Refer to Exhibit 4 to the Application. The current electric service territory boundary for Rolling Ridge Subdivision as depicted on Exhibit 4 does not match the current electric service territory boundary for Rolling Ridge Subdivision as depicted on the certified territory map for the Simpsonville Quadrangle ("Simpsonville Map"), which was certified by the Commission in Case No. 1992-00543² and signed by representatives of Shelby Energy and KU on October 24, 1992, and October 26, 1992, respectively. The Simpsonville Map has a notation "Refer to Agreement dated 10-18-88 Rolling Ridge Subd" ("10-18-88 Agreement").

a. State whether the discrepancy between Exhibit 4 and the Simpsonville Map arises from the 10-18-88 Agreement.

b. If the discrepancy does not arise from the 10-18-88 Agreement, provide an explanation for the discrepancy between Exhibit 4 and the Simpsonville Map.

c. Submit a copy of the 10-18-88 Agreement and any maps or exhibits attached to the Agreement.

d. Was the 10-18-88 Agreement filed previously with the Commission as part of a formal proceeding? If so, provide the case number and case style of that proceeding.

Response 2a: The lack of detail on the Simpsonville Map makes it impossible for Shelby Energy to tell whether there is a discrepancy between Exhibit 4 to the Application and the Simpsonville Map. However, if such a discrepancy exists, it likely arises from the 10-

² Case No. 1992-00543, Application of Kentucky Utilities Company for Authorization of Changes in Service Territory with Louisville Gas and Electric Company and the Rural Electric Cooperative Corporation (Ky. PSC Mar. 8, 1993).

18-88 Agreement (which appears to be a preliminary plan of Rolling Ridge Subdivision) and/or from a letter dated 1-13-94 (the 1-13-94 Letter") and signed by Wayne Anderson of Shelby Energy agreeing that Lot 131 would be served by KU even though it was in Shelby Energy's territory.

Response 2b: See Response to 2a.

Response 2c: A copy of the map that appears to be the 10-18-88 Agreement is attached hereto, as is a copy of the 1-13-94 Letter and the plat that accompanied it.

Response 2d: Shelby Energy has no knowledge whether the 10-18-88 Agreement or the 1-13-94 Letter and the plat were previously filed with the Commission, whether as part of a formal proceeding or informally.

Responsible Witness:

Nick Morris

CONSENTS TO THE INSTALLATION OF WATER AND SEWERAGE SERVICE
 I hereby certify that the above described property is situated
 in the Metropolitan Sewerage District of the City of St. Louis,
 Missouri, and that the same is subject to the jurisdiction of
 said District, and that the same is located in the
 City of St. Louis, Missouri.

DATE: _____

BY: _____

SEAL OF THE DISTRICT

SEAL OF THE CITY

SEAL OF THE DISTRICT

SEAL OF THE CITY

UTILITY AGREEMENT
 THE UNDERSIGNED, OWNER OF THE PUBLIC UTILITY
 SYSTEMS, HAS AGREED TO FURNISH TO THE
 PROPERTY AND UTILITY LOCATIONS
 WITHIN THE BOUNDARIES OF THE
 PROPERTY TO THE UTILITY SERVICE



PLANNED UNIT DEVELOPMENT
 PRELIMINARY PLAN
ROLLING RIDGE
 DEVELOPER: KEN WAINSWORTH
 OWNER: SAKAKI

REVISOR: _____
 DATE: _____

DESIGNED BY: _____
 DATE: _____

AGREED BY: _____
 DATE: _____

AGREED BY: _____
 DATE: _____

ENGINEERS: J. WILSON & LINGO, INC.
 1000 MARKET STREET, ST. LOUIS, MO. 63101
 (314) 435-1100

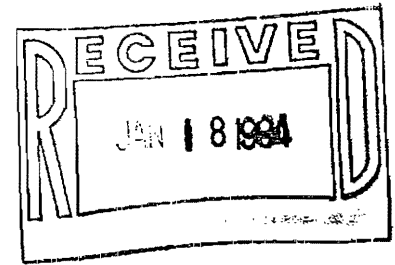
REVISED AREA AGREEMENT
 AGREED BY: _____
 DATE: _____

AGREED BY: _____
 DATE: _____

ENGINEERS: J. WILSON & LINGO, INC.
 1000 MARKET STREET, ST. LOUIS, MO. 63101
 (314) 435-1100

OLD VEECHDALE ROAD
 BRIDGE TOP
 PHASE 1
 PHASE 2
 PHASE 3
 PHASE 4

Kentucky Utilities Company
1100 Main Street
Shelbyville, KY 40065
(502) 633-2722



January 13, 1994

Mr. Dudley Bottom
Shelby County RECC
P.O. Box 309
Shelbyville, KY 40065

Dear Mr. Bottom:

Recently a preliminary plat for Rolling Ridge subdivision Phase 4, Section 1 was submitted to me by Linda Teakle for specification of easements and overall plan for electric service. All lots are within K.U. Co. service territory with the exception of lot 131 which is located in Shelby County RECC territory (see attached map). It is my understanding that Linda Teakle spoke to Shelby County RECC and it was determined to be more practical for K.U. Co. to serve this particular lot. With your signature of approval below, this letter will serve as K.U. Co.'s authority to provide service to lot 131 of this development.

 1-20-94
Shelby RECC Date

Sincerely,



Joe S. Gorley
District Engineer

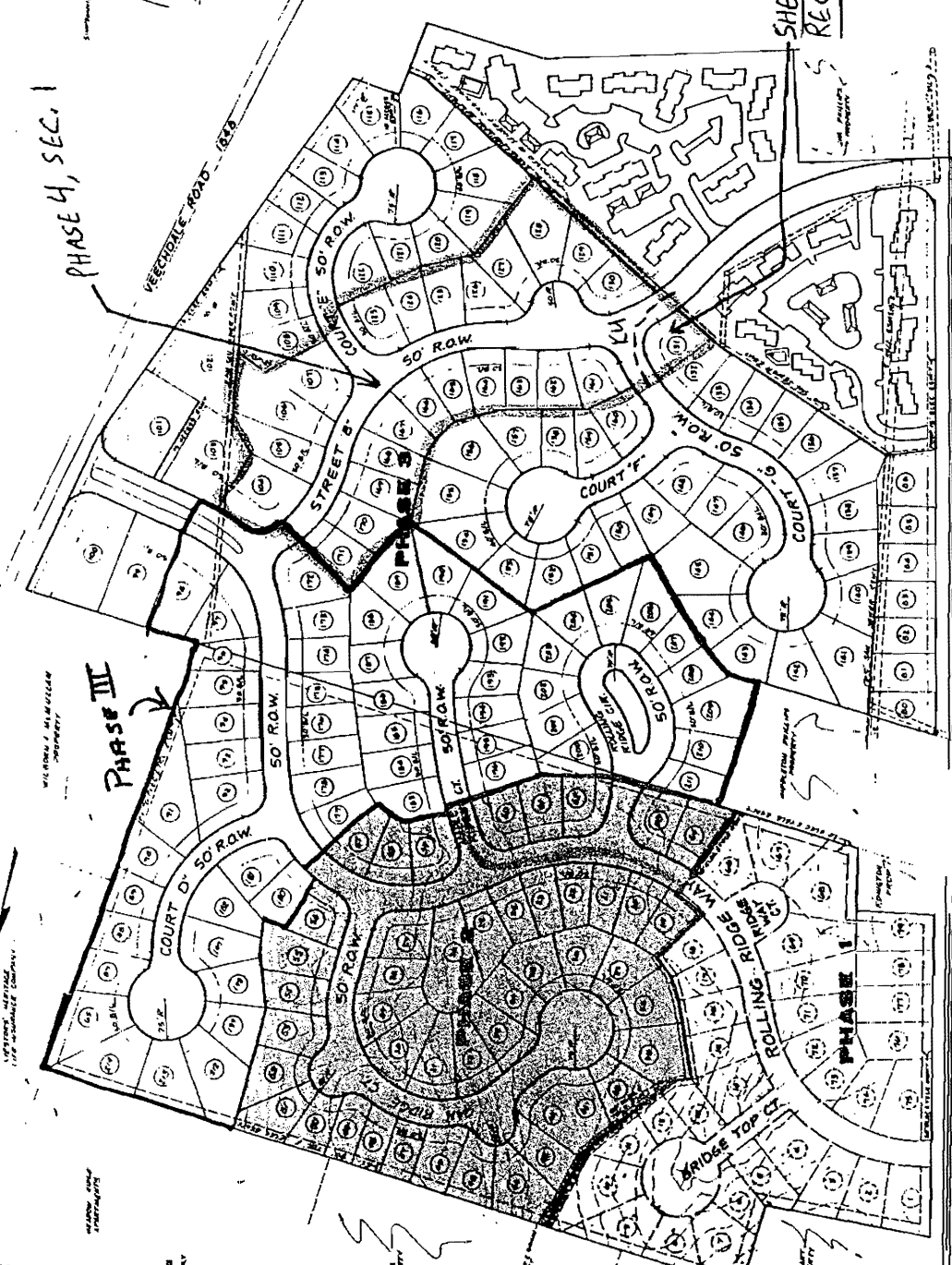
cc: W.A. Conder
H.R. Ellis
L. Teakle

CERTIFICATE OF THE BOARD OF SUPERVISORS, COUNTY OF ALBUQUERQUE, NEW MEXICO, IN REPLY TO THE PETITION OF THE BOARD OF SUPERVISORS OF THE COUNTY OF ALBUQUERQUE, NEW MEXICO, FOR THE RE-APPOINTMENT OF THE BOARD OF SUPERVISORS OF THE COUNTY OF ALBUQUERQUE, NEW MEXICO, TO THE OFFICE OF THE BOARD OF SUPERVISORS OF THE COUNTY OF ALBUQUERQUE, NEW MEXICO, FOR THE YEAR 1954.

I, the undersigned, being duly qualified, do hereby certify that the Board of Supervisors of the County of Albuquerque, New Mexico, is duly organized and is qualified to exercise the powers and perform the duties of said office.

WITNESSED my hand and the seal of said County at Albuquerque, New Mexico, this 15th day of January, 1954.

 CLERK



DATA

TOTAL ACREAGE	73.44
ACRES IN PHASE I	51.93
ACRES IN PHASE II	51.93
ACRES IN PHASE III	51.93
ACRES IN PHASE IV	51.93
ACRES IN PHASE V	51.93
ACRES IN PHASE VI	51.93
ACRES IN PHASE VII	51.93
ACRES IN PHASE VIII	51.93
ACRES IN PHASE IX	51.93
ACRES IN PHASE X	51.93
ACRES IN PHASE XI	51.93
ACRES IN PHASE XII	51.93
ACRES IN PHASE XIII	51.93
ACRES IN PHASE XIV	51.93
ACRES IN PHASE XV	51.93
ACRES IN PHASE XVI	51.93
ACRES IN PHASE XVII	51.93
ACRES IN PHASE XVIII	51.93
ACRES IN PHASE XIX	51.93
ACRES IN PHASE XX	51.93

PLANNED UNIT DEVELOPMENT
 PRELIMINARY PLAN

ROLLING RIDGE

WILSON & LINGG, INC.

SHEBLY RECC